



Strategic Sites Committee agenda

Date: Monday 23 October 2023

Time: 1.00 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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Report to Strategic Sites Planning Committee

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

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1. Summary & Recommendation

The Planning Application

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

Consideration by Strategy Planning Committee

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

Planning Issues

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

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

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

Green Belt harm

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

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

Other harm

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

Benefits

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

Other matters

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

Overall Summary

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

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

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

2 Description of Proposed Development

Location

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

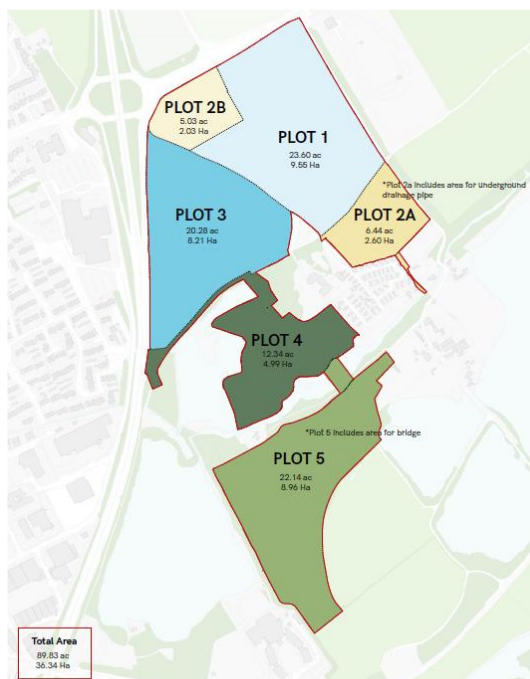
2.2 With the exception of a small area of land within the site used for dog training purposes, the majority of the site consists of open fields and tree belts, having formerly been used for sand and gravel extraction and landfill purposes; the land has been partially restored and re-established naturally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

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

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

Proposed Development

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



Site Development Plots.



Proposed site plan

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

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

2.11 The scheme would provide:

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

Layout, appearance and form

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

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

Access

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

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

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

Timescales and Phasing

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

Planning application submissions

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

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

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

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

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

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

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

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

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

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

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

Environmental Statement

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

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

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

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

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

Community Engagement and Public Consultation:

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

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

3 Relevant Planning History

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

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

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

Adjoining / nearby site history

3.4 The Marlow Football Club applications:

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

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

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

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

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

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

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

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

4 Summary of Representations

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

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

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

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

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

Support

Green Belt + very special circumstances exist
Environment and landscape benefits
Highways improvements

Objection

Green Belt and RUR4 conflict
Highways and transport impact
Environment and Landscape impacts
Impact on neighbours / community
Need does not exist
Infrastructure insufficient to support the proposals

5 Policy Considerations

Statutory Duties, Policy & Guidance Statutory Duties

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

The Development Plan

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

5.5 The relevant Delivery & Site Allocations Plan policies are:

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

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

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

Local Guidance and other Material Considerations:

5.7 Key policy and guidance documents include:

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

Other key material considerations:

5.8 Other key policy documents include:

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

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

Emerging Neighbourhood Plan:

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

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

6 Principle and Location of Development

Wycombe District Local Plan (August 2019):

POLICY CP1 – Sustainable Development

POLICY CP2 – Overall Spatial Strategy

POLICY CP3 – Settlement Strategy

POLICY RUR4 – Little Marlow Lakes Country Park

Wycombe Delivery & Site Allocations DPD (July 2013):

Little Marlow Gravel Pits Supplementary Planning Guidance (SPG) 2002

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

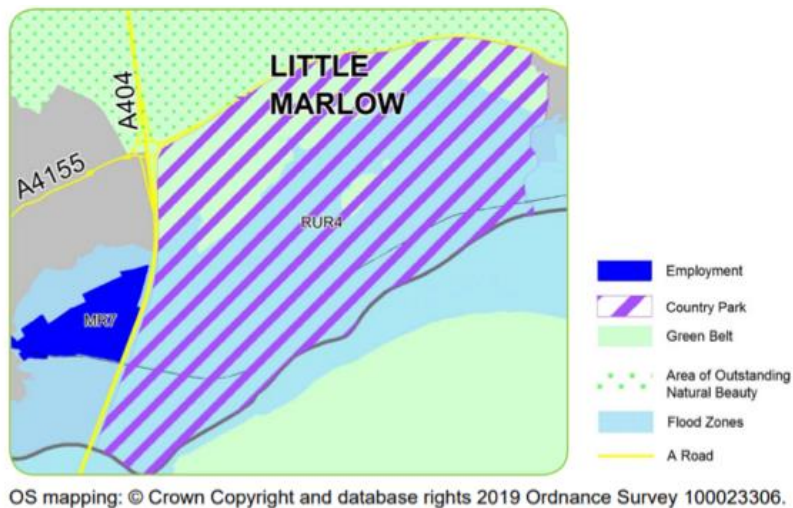
6.2 Policy CP2 – Overall Spatial Strategy, states that the Council will, through the allocations and policies meet the District's growth needs by directing most development to the larger centres and otherwise in accord with the settlement hierarchy and attaching great weight to conserving the landscape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

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

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

Local Planning Policy RUR4 - Little Marlow Lakes Country Park

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



6.5 Furthermore, the supporting text notes that:

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

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

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

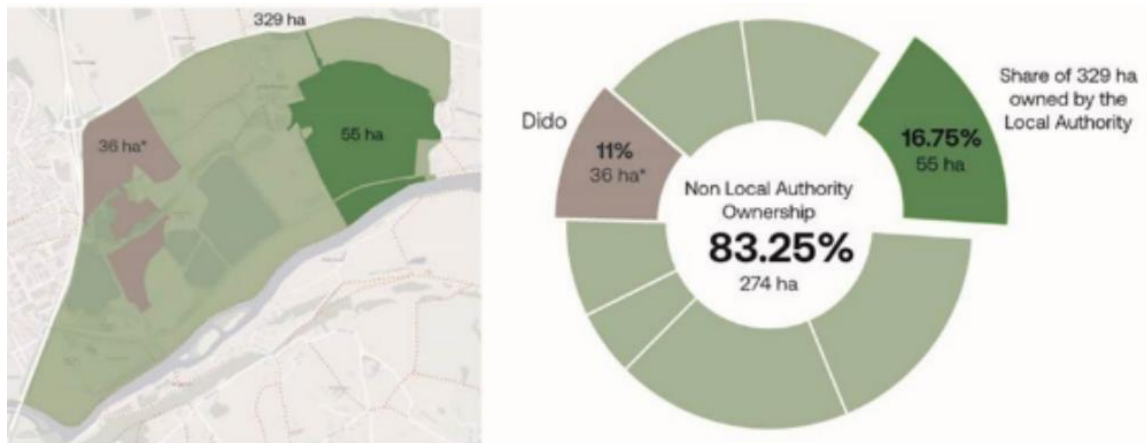
Little Marlow Gravel Pits Supplementary Planning Guidance (SPG) 2002

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

Designation of Little Marlow Lakes Country Park

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

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



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

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

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

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

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

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

Consideration against Policy

6.13 Considering the numbered points of Policy RUR4 in turn:

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

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

5. Criterion 5 requires safe, convenient and direct access to Marlow and Bourne End for pedestrians, cyclists, and disabled users. Plans have developed during the course of the application which demonstrate that the accessibility for these users would be improved beyond the current offering. This is considered to be in accordance with the policy.
6. Criterion 6 requires development close to an existing waterbody or other wetland feature to protect and enhance that feature’s ecological value, biodiversity, and its natural setting within the Country Park. It is considered that the scheme would provide some protection and enhancement of the waterbodies on site, and otherwise provide biodiversity gain to water courses within the RUR4 area. While there would be an urbanising effect on the natural setting of the water body it is considered that there is no significant conflict with this policy requirement.

6.14 Whilst it is accepted that the development would enable some of the aims of policy RUR4 to be delivered, the scheme would fail to meet the overall purpose of this policy which seeks to limit development to those uses associated with outdoor sport and recreation, which preserves the openness of the Green Belt, and that furthers the purposes of the Country Park. Furthermore, as a result of failing to deliver on the main purpose of the policy, the development is also considered to conflict with policies CP1 (Sustainable Development), CP2 (Overall Spatial Strategy), and the Little Marlow Gravel Pits SPG. The development results in significant harm which is considered to weigh against the proposals and will be carried forward into the planning balance.

7 Green Belt

Wycombe District Local Plan (August 2019):

POLICY CP2 – Overall Spatial Strategy

POLICY CP8 – Protecting The Green Belt

POLICY DM42 – Managing Development In The Green Belt

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

Whether the proposal is inappropriate development

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

Impact on Openness Spatial and Visual

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

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

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

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

Spatial impact

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

Visual impact

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

Green Belt Purposes

- 7.10 Turning to the five purposes of the Green Belt, as per paragraph 138 of the Framework, these are:
- (a) to check the unrestricted sprawl of large built up areas;
 - (b) to prevent neighbouring towns merging into one another;
 - (c) to assist in safeguarding the countryside from encroachment;
 - (d) to preserve the setting and special character of historic towns: and
 - (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Context

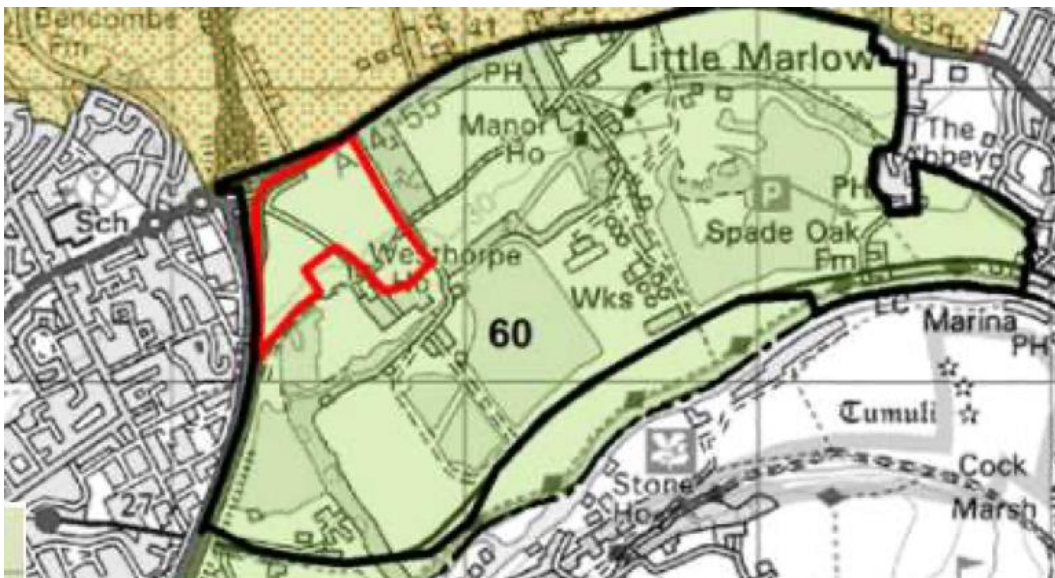
7.11 Background documents to the Local Plan include analyses which help inform the assessment of the impact on openness.

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Green Belt Summary

- 7.27 In summary, the proposed development would constitute inappropriate development which by definition is harmful to the Green Belt and would result in very significant spatial and visual harm to the openness of the Green Belt. The proposals would result in significant loss of open countryside and be in conflict with the fundamental purpose of the Green Belt policy, ‘to prevent urban sprawl by keeping land permanently open’. In addition, the proposals would lead to a conflict with four of the five Purposes of including land in the Green Belt resulting in significant harm to purposes a), b), and c) and considerable harm to purpose e). This harm is afforded substantial negative weight. The proposal would be contrary to local development plan policies CP1, CP2, CP8, DM42 and RUR4. The NPPF states at paragraph 148 that ‘very special circumstances’ (VSCs) will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any ‘other harm’ resulting from the proposal, is clearly outweighed by other considerations. The applicant has put forward VSCs. These and other material considerations are addressed later in the report as part of the ‘Weighting and Planning Balance’.

8 Economic

Wycombe District Local Plan (August 2019):

POLICY CP2 – Overall Spatial Strategy

POLICY CP3 – Settlement Strategy

Policy CP6 - Delivering Land for Business

POLICY CP7 – Delivering the Infrastructure to Support Growth

DM28 – Employment Areas

Delivery and Site Allocation Plan 2013

DM19 - Infrastructure and Delivery

Other material considerations

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

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

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

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

Local Strategies

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

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

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

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

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

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

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

National Strategies

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

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

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

Economic Case - Need

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

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

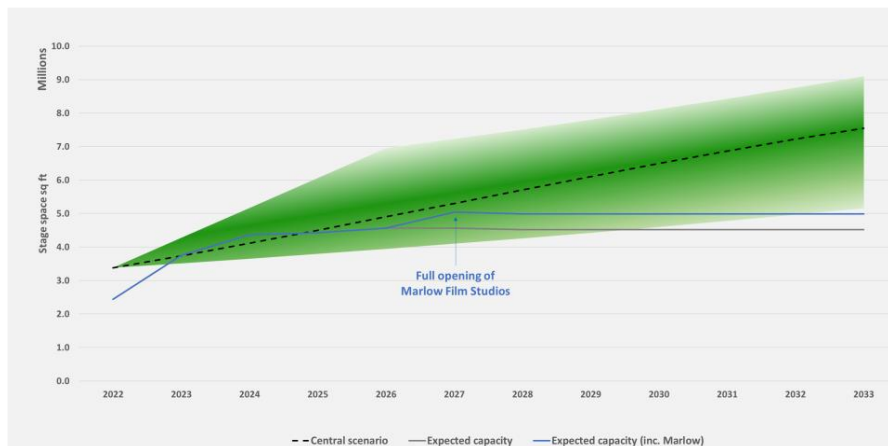
8.17 Volterra state that supporting and building on existing clusters forms a key Government objective in order to deliver future economic growth. They argue that as global competition heightens, and with the uncertainty caused by Brexit and COVID-19, it is even more important that we nurture and invest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

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

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

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

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



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

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

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

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

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

Volterra: Table 5 Supply and demand

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

LSH comparative figures

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

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

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

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

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

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

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

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

Skills & Training

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

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

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

Economic benefits

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

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

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

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

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

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

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

Justification for Proposal - Critical Mass

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

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

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

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

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

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

Justification for Proposal – Alternative Sites Assessment (ASA)

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

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

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

Conclusions

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

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

9 Landscape

Wycombe District Local Plan (adopted 2019)

POLICY CP7 - Delivering the Infrastructure to Support Growth

POLICY CP9- Sense of place

POLICY CP10 – Green Infrastructure And The Natural Environment

POLICY RUR4- Little Marlow Lakes Country Park

POLICY DM30 – The Chilterns Area Of Outstanding Natural Beauty

POLICY DM32- Landscape Character and Settlement Patterns

POLICY DM34- Delivering Green Infrastructure and Biodiversity in Development

POLICY DM35- Placemaking and Design Quality

Delivery And Site Allocations Plan (2013)

POLICY DM11- Green networks and infrastructure

Wycombe District Landscape Character Assessment 2011

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

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

Landscape character

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

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

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

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

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

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

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

Table 1.2: Effects of the Proposed Development on Landscape Character

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

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

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

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

Visual effects

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

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

Table 1.4: Viewpoint analysis summary

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

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

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

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

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

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

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

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

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

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

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

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

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

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

AONB Setting

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

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

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

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

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

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

Dark skies

- 9.37 The approach to lighting is set out in the Design and Access Statement and it is stated that the lighting strategy aims to enhance the appearance of the building whilst recognising the area's medium to low district brightness. The entrances to the buildings will be lit from surface mounted or soffit fixings, supplemented by bollard lighting. There are also column lights on the roads. The design avoids the use of uplights to avoid extreme reflection and glare. It is stated that light spill from interior lighting will be reduced through controls. It is stated that filming at night does not take place very frequently, and, there would be no permanent flood lighting installed in the backlot areas. *When temporary lighting is required, it will be directed into the area identified as backlot. Areas outside this area would create dark buffer zones for the existing habitats.*
- 9.38 Operational night time lighting has been assessed as part of the ES LVIA. The LVIA Table 1.4 above also sets out night-time effects. Operational lighting would be visible at night in a number of views, the intervening vegetation would partially obscure views, but the illuminated buildings and backlot would be visible. A number of adverse effects are reported including in respect of the views from Winter Hill and Bloom Hill.
- 9.39 While lighting should be directional to avoid unnecessary light pollution, and can be subject to planning conditions, it is considered that the illumination associated with the development would have some impact upon the dark skies context of existing views including from Winters Hill and Bloom Hill. It is noted

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

Summary

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

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

10 Raising the Quality of Place Making and Design

Wycombe District Local Plan (August 2019):

POLICY CP9- Sense of place

POLICY RUR4- Little Marlow Lakes Country Park

POLICY DM35- Placemaking and Design Quality

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

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

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

Site context and scheme design

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Conclusions

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

11 **Arboriculture**

Wycombe District Local Plan (August 2019):

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

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

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

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

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

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

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

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

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

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

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

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

12 Residential Amenity

Wycombe District Local Plan (August 2019):

POLICY CP7 – Delivering the Infrastructure to Support Growth

POLICY CP9 – Sense Of Place

POLICY DM35 – Placemaking And Design Quality

Wycombe District Adopted Delivery And Site Allocations Plan (2013)

POLICY DM19 - Infrastructure And Delivery

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

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

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

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

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

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

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

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

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

Table 11.11: Demolition & construction noise assessment

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

Table 11.20: Demolition & Construction Noise Assessment - Mitigated

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

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

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

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

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

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

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

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

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

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

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

Healthy & Safe Communities

12.21 The supporting Design and Access Statement (DAS) summarises the safety and security proposal for Marlow Film Studios. Document 20: Security Needs Assessment provides further information on the threats and mitigation strategies.

It is stated that the design will provide a safe environment for the workforce, visitors and staff. The design solutions adopted in Marlow Film Studios include:

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

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

13 Heritage

Wycombe District Local Plan (August 2019):

CP11: Historic Environment

DM31: Development Affecting the Historic Environment

RUR4: Little Marlow Lakes Country Park

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

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

13.4 Paragraph 194 of the National Planning Policy Framework (NPPF) states that information held in the relevant historic environment record should be consulted and expert advice obtained where necessary. The NPPF recognises that the effect of an application on the significance of a heritage asset (including its setting) is a material planning consideration.

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

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

Archaeology

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

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

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

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

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

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

Heritage assets

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

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

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

Westhorpe House

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

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

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

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

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

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

Corners Cottage

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

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

Little Marlow Conservation Area (LMCA)

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

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

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

The Benefits of New Film Studios on Local Heritage and Landscape

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

Cumulative effects

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

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

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

Summary

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

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

14 Highway Safety, Transport and Access

Wycombe District Local Plan (August 2019):

POLICY CP7- Delivering the Infrastructure to Support Growth

Policy CP13 – Climate Change

DM33 - Managing Carbon Emissions: Transport and Energy Generation

Wycombe District Delivery and Site Allocations Plan (2013):

DM2 - Transport Requirements of Development Sites

Parking Standards and Guidance (Oct 2015)

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

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

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

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

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

Site location and Local Highway Network

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

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

Existing Pedestrian and cycle links

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

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

Existing Public Transport

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

Proposed site access

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

Sustainable Transport Strategy

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

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

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

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

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

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

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

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

Traffic generation and proposed mitigation

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

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

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

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

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

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

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

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

Assessment

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

Traffic generation modelling

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

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

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

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

A4155 Little Marlow Road/Wiltshire Road Roundabout

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

A4155 Little Marlow Road/Parkway Roundabout

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

A404/A4155 Westhorpe Interchange

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

A4155 Marlow Road/Pump Lane South/Site Access

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

A4155 Marlow Road/Westhorpe Farm Lane

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

Summary

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

Wide Area Network Assessment

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

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

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

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

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

Sustainable Travel Strategy

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

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

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

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

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

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

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

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

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

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

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

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

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

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

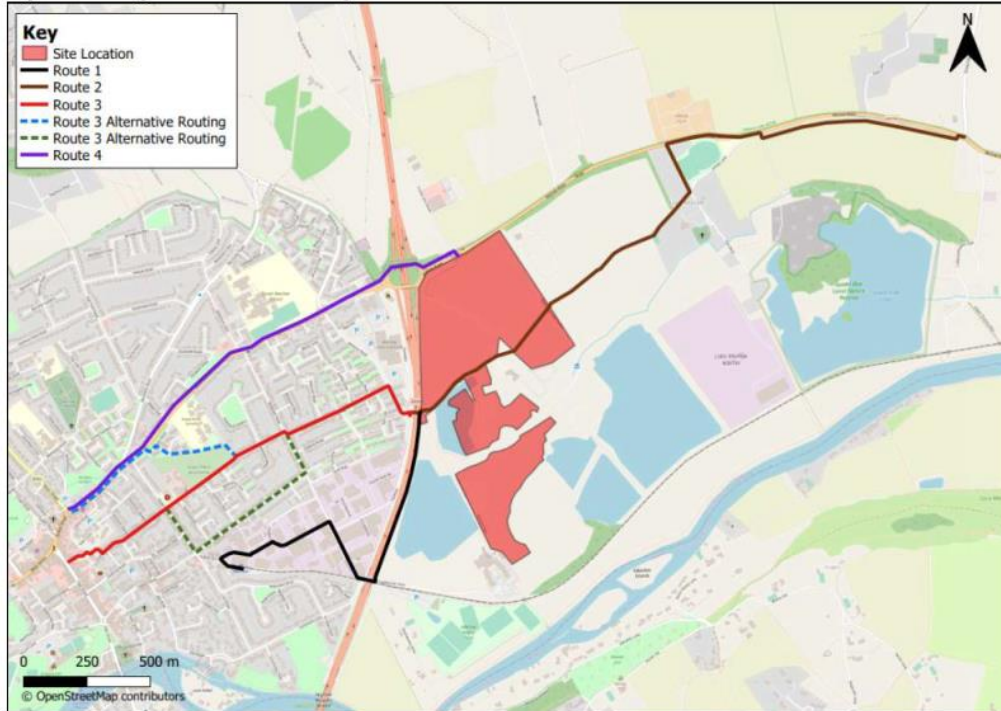
Active Travel Strategy – walking and cycling

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

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

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

Figure 1.1: Agreed WCHAR Study Area



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

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

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

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

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

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

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

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

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

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

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

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

Walking and cycle connections summary

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

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

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

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

Car Parking

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

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

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

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

Internal site road layout

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

Conclusion

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

15 Air Quality

Wycombe District Local Plan (August 2019):

POLICY CP7- Delivering the infrastructure to support growth

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

POLICY DM35- Placemaking and Design Quality

Air Quality SPD (SPD) (March 2020)

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

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

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

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

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

16 Ecology & Biodiversity

Wycombe District Local Plan (August 2019):

POLICY CP7 - Delivering the Infrastructure to Support Growth

POLICY CP9 - Sense of Place

POLICY CP10- Green infrastructure and the Natural Environment

POLICY RUR4 – Little Marlow Lakes Country Park

POLICY DM34- Delivering Green Infrastructure and Biodiversity in Development

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

POLICY DM11- Green networks and infrastructure

POLICY DM12- Green Spaces

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

POLICY DM14- Biodiversity in Development

POLICY DM15 – Protection and enhancement of river and stream corridors

Biodiversity Net Gain SPD (2022)

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

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

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

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

Designations and Habitat Regulations 2017

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Design approach and Ecology

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



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

Habitats and Biodiversity Net Gain (BNG)

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

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

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

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

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

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

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

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

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

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

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

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

Species

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

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

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

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

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

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

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

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

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

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

- 16.44 **Great Crested Newts:** No records of great crested newt (GCN) were returned within 1km of the Site. All relevant and accessible water bodies were subject to eDNA survey to assess the status of GCN – all of which yielded negative results.
- 16.45 Under the Habitats Directive mentioned above a licensing system is in place to permit otherwise unlawful activities and can only be granted for certain purposes. Natural England guidance sets out the relevant tests to be considered. The Local Planning Authority should have regard to the three tests that need to be satisfied before Natural England can issue such a licence. As there is no evidence of bat roosts on site or GCN it is not considered that licensing would be required.
- 16.46 **Badgers:** The site was recorded as being used by foraging and commuting badgers, with one main sett and one annex sett present which are to be retained through development.
- 16.47 The proposals will have an impact upon some species through loss of their habitat but some of the onsite proposals will at least in part compensate for the impacts. Green roofs will provide some compensatory habitats for invertebrate species. Wherever possible, plant species which are associated with the priority or rare invertebrates should be included in the green roof plant mixes. Enhancements to some of the areas on site should help benefit reptiles and may benefit other species.
- 16.48 The loss of wide areas of floristically diverse habitat, which is known to be used by species such as foraging and commuting bats, foraging barn owls, ground nesting birds such as sky lark and many other species (which may not be priority species and so have not been identified), will be lost from the site and will not be adequately compensated for unless the offsetting area is designed to accommodate them.
- 16.49 Other impacts of the development (both through construction and operation) on species (and to some extent on habitats) would need to be addressed through detailed mitigation measures. It is already proposed to include green roofs on many of the buildings and also some green walls, however there are many other ecological enhancement features which could be included to help ensure there are biodiversity net gains for species as well.
- 16.50 It is understood that since the updated surveys of the waterbodies on site have shown no indication of the presence of Great Crested Newts, there is considered to be no need for district licencing and Reasonable Avoidance measures will be sufficient.

Overall assessment

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

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

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

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

17 Climate Change and Building Sustainability

Wycombe District Local Plan (August 2019):

POLICYCP12- Climate Change

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

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

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

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

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

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

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

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

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

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

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

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

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

18 Flood Risk & Drainage

Wycombe District Local Plan (August 2019):

POLICY CP7- Delivering the Infrastructure to Support Growth

POLICY CP12- Climate Change

POLICY DM39- Managing Flood Risk and Sustainable Drainage Systems

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

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

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

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

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

Sequential Test Approach

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Exceptions Test

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

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

Flood risk mitigation and drainage

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

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

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

SUDs and Drainage

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

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

Utilities

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

Conclusion

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

19 Ground Conditions, Minerals Safeguarding

Buckinghamshire Minerals and Waste Local Plan (July 2019):

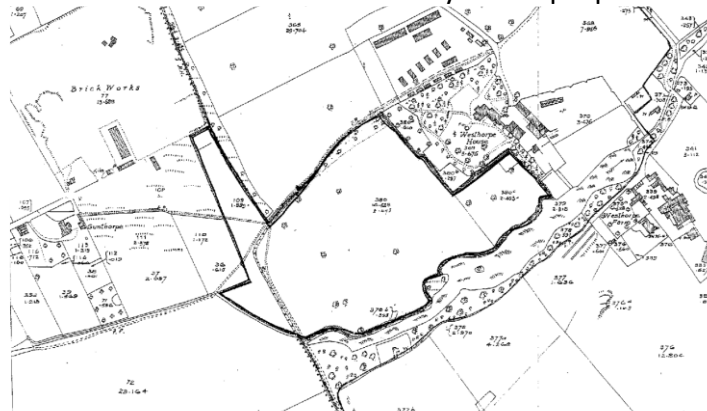
Policy 1: Safeguarding Mineral Resources

Policy 26: Safeguarding of Minerals Development and Waste Management Infrastructure

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

Minerals Safeguarding

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



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

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

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

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

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

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

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

Ground Conditions

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

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

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

20 Other Environmental Matters

Wycombe District Local Plan (August 2019)

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

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

Agricultural Land

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

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

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

Waste

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

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

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

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

Matters relating to the Environmental Impact Assessment

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

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

21 Infrastructure and Developer Contributions

Wycombe District Local Plan (August 2019):

POLICY CP7- Delivering the infrastructure to support growth

Wycombe District Delivery and Site Allocations Plan (2013):

POLICY DM19- Infrastructure and delivery

- 21.1 Policy CP7 states that provision will be made for new infrastructure to support growth, through planning obligations, the Community Infrastructure Levy (CIL) and other available funding streams as appropriate. Where justified, development will be required to provide or contribute towards delivering the key infrastructure requirements for the District.
- 21.2 DSA Policy DM19 states that where development will create a need to provide additional or improved infrastructure, amenities or facilities, developers will be expected to make provision directly including through planning obligations and / or through financial contributions to the Wycombe Community Infrastructure Levy.
- 21.3 Having regard to the relevant guidance and statutory tests for planning obligations in the Community Infrastructure Levy regulations and the National Planning Policy Framework, it is considered that the measures set out below would be required to be secured within a section 106 agreement in order for the proposed development to be acceptable.

Travel Plan Provisions

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

Bus provision

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

Mode Share Incentive Scheme (MSIS)

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

Footpath and Cycleway Links

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

Sustainable Transport Contribution

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

Country Park Provision

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

Minerals Provision (ROMP)

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

Local Economic Benefits Provisions

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

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

Public Use Provisions

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

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

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

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

Café Facilities

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

Public Art

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

SUDS

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

Biodiversity Net Gain Provisions

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

Management Company

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

Contributions

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

Unilateral Undertaking

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

Public uses provisions

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

Charging Point Contribution

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

Additional Mitigation Measures

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

22 Weighing and balancing

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

Statutory duties

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

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

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

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

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

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

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

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

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

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

Green Belt and other harm

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

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

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

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

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

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

Benefits – the applicant’s case for Very special circumstances

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

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

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

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

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

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

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

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

Other benefits

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

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

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

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

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

Balance relating to Heritage

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

Conclusion on balancing exercise

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

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

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

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

Equalities Act

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

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

Human Rights Act

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

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

Working with the applicant / agent

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

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

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

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

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

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

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

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

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

APPENDIX A1: Consultation Responses

BC Councillors:

Cllr D Watson (Ward Councillor):

Original Comments:

It is apparent that the application to build a Film Studio in Little Marlow is contentious with a significant number of local residents. Given the large scale of the proposed development I would ask, should officers be minded to approve this application, that it be determined by the appropriate planning committee.

Further Comments:

For the avoidance of doubt please be aware that I remain of the opinion that should the officers be minded to support this application then I would ask that this application be referred to the relevant planning committee for determination.

Additional Comments:

Further to the recent planning amendments I remain of the opinion that this application, if approved by the officers, should be referred to the relevant planning committee for determination.

Cllr D Johncock (Ward Councillor):

Original Comments:

I would like to second this call-in and also speak at the committee meeting if you are minded to recommend approval.

Further Comments:

Thank you for highlighting yet more documents trying to justify the building of this monstrous film studio on Green Belt land. Frankly, these latest documents fail to convince me on how the applicant will meet all the Council's planning policies and simply offers various forms of mitigation which certainly will not overcome the huge amount of harm that will be done if this application is permitted. More worrying, there seems to be some doubt now as to whether they would even provide the proposed training in the medium to long term and use the phrase "the first owner" which does not seem to support the applicant's previously stated commitment to this project long term. Clearly, these latest updates have not convinced me that the proposed scheme should now be supported and I remain of the view that the application should be refused.

Cllr S Wilson:

I am writing to OBJECT to the proposed development of Marlow Film Studios at Little Marlow Lakes Country Park (22/06443/FULEA).

This planning application is entirely contrary to Policy RUR4 of the Wycombe Local Plan and the 2002 Supplementary Planning Document for Little Marlow Lakes. Excessive development in the Little Marlow Lakes Country Park area will impact the provision of appropriate mitigation intended to offset recreational impact of the developments in Bourne End and Wooburn Town (Policies BE2 Hollands Farm and BE1 Slate Meadow) with regard to Burnham Beeches SAC. The reasons for objection here are not only the first principle of ANY development beyond that limited to supporting recreation, but all other implications of development on the green belt, impact on the adjoining AONB, ecology, appearance and character of the area, impact on the A404, Westhorpe Interchange, other nearby junctions (Sheepridge Lane roundabout) and main roads.

We also have grave concerns on additional traffic through Hedsor, Bourne End and Wooburn which will use roads from the east where many film and television production facilities and staff are already sited. There are additional concerns on commuter parking where staff may dump cars in an already over-stretched Bourne End to use the proposed "hopper service". There is no public bus service from Bourne End to Marlow at present and any bus provision needs to be regular, frequent and between terminus points in Bourne End and Marlow.

Cllr P Drayton:

As a member of Buckinghamshire Unitary Authority Council, a Ward Councillor for the Wooburns, Bourne End & Hedsor (the neighbouring Ward to the application site), I would like to OBJECT to this application to build Marlow Film studios on Green Belt land within Little Marlow Lakes Country Park.

1. Development on Green Belt

As per the NPPF Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Green Belt land should only be downgraded or built upon in exceptional circumstances. The Green Belt in this location demonstrates and serves EVERY ONE of the five purposes listed above. There are no justifiable exceptional circumstances in this situation which would make this development acceptable. To note, Green Belt does not have to be beautifully manicured and sculptured. Despite this site being referred to as scrub land it not only serves

the purpose above but supports wildlife and wild landscape which has naturally evolved since the days of it being landfill and has great ecological value.

2. Cross purposes with the policy RUR4 in the Wycombe local Plan (adopted August 2019) - Little Marlow lakes Country Park.

Developing on the site of Little Marlow Lakes Country Park is in direct contradiction to policy RUR4 in regards to the following points within the policy;

1. The Little Marlow Lakes Country Park, as defined on the Policies Map, is allocated for outdoor recreation.
4. Planning permission will not be granted for development within the Country Park that has an adverse effect upon the amenities or setting the River Thames, watercourses, lakes, wet woodlands, adjoining conservation areas, or listed buildings, or which prejudices the function of the area for the purposes of a Country Park.

The idea can be 'prettied' up as much as the applicant likes (e.g we will provide some recreational space), but ultimately and fundamentally if the site is built upon it is detrimental to the space available and opportunities of recreational space.

Little Marlow Lakes Country Park is an important mitigation factor in policies BE1 and BE2 within the Wycombe Local Plan to provide alternative open green space to offset the recreational impact on Burnham Beeches SAC. If this alone, or in conjunction with other current and future applications on Little Marlow Lakes Country Parks, were to be granted, it would make these policies impossible to uphold.

3. Adverse hit on effects to neighbouring communities

There is not a sufficient transport solution locally to uphold or support the issues the additional car movements will bring. Suggesting so many will travel by train is not only unrealistic but unenforceable too. Bourne End already suffers with all the surrounding village centre residential roads being parked on, by commuters, but in addition many who intend to get the shuttle bus from Bourne End station, may drive to Bourne End and park up as opposed to getting the train as intended.

The local road structures are at (or nearly at) capacity and with the anticipated increase of movements to and from the Bourne End area, with the additional 800 homes in the Wycombe Local plan, plus the commuters for the Film studios it would bring the Village and surrounding communities to a stand still.

Summary

I am not objecting through an anti film studios perspective and appreciate there are benefits a studio could bring to an area, but I fully oppose the site selected being developed on. I feel there is not justifiable cause for the location to override the other local benefits and issues

and that in the best interests of the majority of the local residents, this application should be refused.

Cllr L Clarke:

Original Comments:

I support this application on the many improvements it will make not only to the local area but to others further afield.

I represent Abbey Ward in High Wycombe, within Buckinghamshire Council. Within Abbey ward there are two major sites who would both benefit and find many opportunities this application offers; these being Buckinghamshire New University with their Media Faculty and Buckinghamshire College opening in September 2024 with over 1000 students, both of the two educational establishments would be able to offer apprenticeships, work experience and employment to these young people and others. This would encourage more young students to remain in the area. This would both support and enhance the proposed education and skills commitment and fully support the proposed Culture and Skills Academy to be installed on this site.

This would also support the 4000+ offers of employment on this site and further afield that this application would bring. Notwithstanding the "on-spend" within the local community in the local retail and catering establishments.

This is both an outstanding and exciting opportunity for Buckinghamshire to become a larger player in the expanding offer of both film and television making services within Buckinghamshire itself. To then use an area that was the former refuse facility for the town of Marlow and now a very neglected area of an infill site. We must also remember that this site provided the gravel, for the nearby A404, which is part of the national strategic road network.

With the close proximity of this strategic road network, which will be a great asset to this application, with the inclusion of the offer by the applicant of several bus routes; locally from Bourne End into and out of Marlow itself, another being from High Wycombe through to Marlow, in particular this area and the nearby Globe Park Business Park, not to mention the Wycombe Sports and Athletic area nearby providing a service for everyone to get to and from these sites using the local bus network, something that at present is not in place. Further with the planned bus route going on to Maidenhead and that in itself offers travel to other areas of Southern and South Western England, notwithstanding the use of the newly opened Elizabeth Line into London and beyond. This offers flexibility of travel to all, something which is not on offer in any form today.

I fully support the upgrade to the cycling/walking routes locally, which could also help to put into place a cycling route from High Wycombe town centre, without cyclist having to use the main roads themselves. Something that could be an integral part of the Buckinghamshire Local Walking and Implementation Project (LCWIP).

I believe that this application will enhance the area dramatically and in this time of economic uncertainty it is an opportunity to ensure that there is employment on offer locally.

For the reasons set out above I fully endorse and support this application. I believe it delivers the special circumstances that the Council has put forward. I support wholeheartedly this application for the future employment of young people locally. It is a golden opportunity for everyone.

Further Comments:

Further to my previous comments, as sent 3rd January 2023, I would like to make it clear that I fully support this application, with the suggested amendments. Further, I seriously believe, that this application should be determined under the planning rules of "Special Circumstances" as I believe that this application, shows the many ways the special circumstances it offers. Furthermore, I believe it will materially enhance the area, with the notable upgrade of the local infrastructure, along with providing significant employment with the commensurate economic benefits, to the surrounding areas and promote Buckinghamshire as an outstanding area for film, television and media services.

Additional Comments:

I fully support this application and have from the very start. The offer that this planning application gives to the local area for jobs, not merely in the local Marlow area, but further a field such as High Wycombe for people and young people is enormous. With Buckinghamshire College also building a new campus what a splendid opportunity for their young students and those of BNU on their Media Degree Course to be able to find employment here, locally. With the offer of new bus routes, the change of the road layout, which in itself saves this Council's Highways the worry and enormous costs of providing this in the future. This application has much to offer on a local and regional economic basis, which I believe, should, override the Green Belt issues. As we are ALL aware the land is of poor quality, it can not be used for agriculture or housing due to the past use of this site. The opportunity this application brings is of great benefit to local tax payers and the local businesses surrounding area too..and we should not be frightened of supporting it

Cllr D Hayday:

I fully support this application and cannot wait for it to be built. The film industry is an exciting and growing industry to be working in the UK at this time and I suspect the future as

well.

I have received threats on my previous comments made regarding the previous application and I shall stand my ground and not be intimidated over this. Also as a Bucks Councillor, I have every right to comment on any application in any part of the County. This if passed would be very near to where I live as well.

Also I know it would be working in partnership with local schools.

Being someone who regularly litter picks in all weather, I care a great deal for our environment. I have all my life cared for the environment.

I do understand why people are against this application, but I want to think of a future for our children, grandchildren and to have a local place of employment / or for others to be employed here from outside of the area. A job is a job is a job.

Pinewood Studio shows us how much this as an industry is growing.

I love films and TV content, hope that this is passed and we can see the first building being put up.

Am not a member of the planning committee and have no connection with anyone involved in this project, other than showing my continued support.

Cllr S Kayani:

I am emailing my objection to the planning application for Marlow Film Studios on the grounds that it contravenes RUR4 of the Wycombe Local Plan that designates Little Marlow Country Park as an area for recreational use and limited development.

Parish/Town Council Comments

Little Marlow Parish Council (applicable Parish):

Original Comments:

The site is designated as Green Belt in the National Planning Policy Framework (NPPF) and part of the Little Marlow Lakes Country Park in the Wycombe District Local Plan.

Section 138 of the NPPF should stop unrestricted sprawl of built-up areas, prevent neighbouring towns from merging, safeguard the countryside and preserve the setting and special character of historic towns, all of which would be contravened.

The Wycombe District Local Plan (which is extant for this area) states in policy RUR4 that the Little Marlow Lakes Country Park is allocated for outdoor recreation and only developments for environmental improvements should be allowed that also provide safe access for pedestrians, cyclists and disabled users from Marlow and Bourne End. It stipulates that developments which have any adverse effect on the amenities of the area or prejudice the function as a Country Park are not permitted. Large industrial buildings over 20m high would destroy every element of this.

There are no Very Special Circumstances to justify the harm to the Green Belt:

i) the economic benefits are based on values for the whole of the film industry including distribution and marketing not just production, the employment figures do not stack in an area where there are currently 67059 jobs on Indeed.com and there is definitely no increase in accessibility because the development will remove many existing deemed rights of way that currently exist over large parts of the site.

ii) the claimed gains in biodiversity are irrelevant especially as the applicant is suggesting offsetting this and no site has yet been identified and could not possibly be close enough to relocate what is present now including a huge population of protected flora and fauna including bats, newts, badgers and rare orchids and stoneworts.

The development will dramatically damage the Visual Amenity of the area, most significantly around the Westhorpe Park Homes conurbation but also from an enormous area of the Chiltern Area of Outstanding Natural Beauty which according to the 2019-24 management plan should be protected from visual impact by any new developments.

This land also includes the Grade 2 Listed Westhorpe House and Park where the setting of historic parkland makes a significant contribution to its Heritage asset (para 180-208 NPPF) and this would be destroyed by the development.

The increase in traffic movements quoted as being around 2000 vehicles per day will completely overpower the Local Traffic Network which is already over capacity at certain times of day and will further reduce the Air Quality in Marlow which is already described as poor at times, hence the objection from Highways. It should be noted that the present proposed mitigation measures are totally unworkable and are based on untried and untested modelling.

The applicant has not shown evidence that significant effort has gone in to identifying alternative sites and has confined the search to within the West London Cluster which is contrary to the National Industry Strategy 2017 and Creative Industry Sector Deal 2018 whereby Government policy is to spread the media industry to other parts of the country in line with the Government's levelling up strategy. In fact the economic benefits to both Bucks and the UK are not proven to be dependent on being so close to this cluster.

Removal of such a large area of open space will also create a huge increase in the flood risk and has caused the objection by the LLFA. Little Marlow Parish Council therefore request that this application is refused.

If the Council are minded to approve this application LMPC requests that the following Mitigation measures are considered.

Proposed Mitigation Measures

High Priority

1. Increasing the area of the Little Marlow Lakes Country Park under public ownership to accelerate its development.

- a. The purchase of the 2 riverside meadows currently owned by Westhorpe Farm (marked A1 and A2)

- b. The purchase of the land to the East of the running track owned by Follets (marked B)
- c. Transfer of land ownership of Plots 4 & 5 from Dido Properties Ltd to BC to enable Net Biodiversity Gain to be realised on-site.



- 3. Enhancing access and safety at the principal entrance to the Country Park
 - a. The creation of a mini-roundabout at the entrance to Muschallik Road and School Road
 - b. The surfacing and widening of Muschallik Road
 - c. The creation of a carpark for up to 80 cars in the disused quarry area to the North of Spade Oak Lake
 - d. Creation of a footpath from the quarry area to the riverside area A1
 - e. The creation of a drop-off/pick-up point for Little Marlow School
- 4. Creating amenities for visitors to the Country Park in the disused quarry area to the North of Spade Oak Lake
 - a. Visitor and Education Centre
 - b. Café
 - c. Administrative office & Ranger/Volunteer facility
 - d. Public toilets
 - e. Children's Play Area (Natural Play)
 - f. Forest School
 - g. Services Infrastructure (water/electricity)
- 5. Providing an alternative access road for the Westhorpe area residencies via Westhorpe Farm Road
- 6. Improving access to the Riverwoods Open Space/picnic area of the Country Park
 - a. Access road
 - b. Parking for 25 cars
- 7. The provision of recreational facilities in the Follets land (marked B)
 - a. Expansion of public carpark at running track
 - b. Creation of a bike park (eg BMX and/or off-road cycle training track)

- c. Creation of a pitch and put course with associated facilities
 - d. Creation of a natural play park for children
- 8. The provision of recreational facilities in the in the riverside meadows (marked A1 and A2)
 - a. Natural play park
 - b. Picnic facilities
 - c. Adult well-being area
- 9. Improvements to biodiversity
 - a. Enhancements to hedgerows in the area
 - b. Riverbank restoration at Spade Oak Meadow (A3)
 - c. Creation of new wetland habitats in the riverside meadows (marked A1, A2 and A3)
 - d. Miscellaneous new plantings and habitats

Additional Comments:

Little Marlow Parish Council would like to reiterate the original objection below, submitted on 1st August 2023, and to raise concerns about the proposed new roundabout and impact on access to Westhorpe.

Further Comments:

Following on from consultee submissions on 1st August 2022 and 12th May 2023 Little Marlow Parish Council are submitting and reiterating their original objections to planning application 22/06443/FULEA.

Having consulted further with local residents, reviewed recent planning updates and discussed additional plans with the applicants Little Marlow Parish Council continue to object to the planning application.

Marlow Town Council (Neighbouring 'Parish'):

Latest Comments:

The above application affects two main parishes in the immediate vicinity of this application, as neighbours to the development. Marlow is the most significant settlement adjacent to this application and has a population approximately ten times greater than Little Marlow and a population density per square kilometre that is approximately thirty times greater. The statutory position of ward boundaries designates the position of consultee as a parish to Little Marlow. Marlow is not a statutory consultee and has therefore not received a statutory consultation request. Importantly we wish to add our own position as the closest and most dense settlement to the site , inevitability our residents will also be impacted as the closest Town.

In exercising its public service role, Marlow Town Council recognizes that it has a clear duty in representation of its 14,767 residents (Marlow Population [2021] Census). We have actively been encouraged and lobbied by our residents to form a view on the above application, including both positive and negative aspects, and have encouraged residents to make representations on the application via the BCC planning portal which we see are substantial. Notably, on the planning portal, there are approximately 3,600 representations posted, 2400 in support of this application and 1,200 against . Marlow Town Council members have followed in detail the elements of the application as it evolved and careful note of statutory consultee inputs and resident input to make an informed and fact driven representation. Councillors have attended representations at public consultations and soundings to inform themselves of the detail which were extensive. On balance, there is very positive support for the application currently, regardless of residents' exact locations in the county and this support is reflected in the representations made so far, with a near 2:1 ratio in favour, which aligns with the messaging coming from our Marlow residents.

Marlow Town Council has therefore informally consulted its entire membership group of Councillors at a members' only meeting (not an official Council meeting) through a democratic extensive debate and discussion on the 24th of August 2023 - (see meeting note below *).By majority vote, we have decided to fully support this application and not raise any objections to the proposed development. We recognize that our local Planning Authority (Bucks Council) will determine the lawfulness of the application's outcome, and its strategic planning group will convene to review the application at a point determined by them. The observations in coming to this decision and noted below.

(Note: Members agreed that the transport element of this application is complex, and statutory consultee comments and reporting have not yet been finalized. Such complexities can only be determined by data and analysis conducted by experts regarding highways operations.)

In coming to our decision to fully support this application the following points and observations from the application were noted :

- The site has historically been gravel pits that have ceased to operate over time and have been used for land backfill, waste disposal, and have been poorly remediated and landfilled. The development seeks to reclaim and regenerate a large area of very low-quality contaminated landfill that is mostly inaccessible to the public, other than a basic footpath dissecting its area from its public intersection from the Volvo footbridge to Little Marlow.
- Historical attempts to establish the site as a country park have been in discussion since the late 70's and as such a long term a legacy of waste dumps, waste processing and unlicensed activities have continued over the years. It is apparent that commitments could offer a future joined-up solution that will allow the

implementation of a well-managed adjunct to the Spade Oak area by creating enhanced access to those areas in the future.

- It is noted the applicant intends to use roughly 50 acres of a 150-acre overall site and enhance legitimized public access in the future with a commitment to 9 acres of open public space and a culture and skills academy. A provision is proposed for a further 15 acres of wildlife-protected land on bordering areas of the site .
- It is noted in recent new document submissions a 20% Biodiversity Net Gain in both on-site and nearby areas through a recent acquired addition to the applicant's site, achieving twice the national BNG standard, increasing even further public access and a potential enlargement of the country park and SANG area. This has the potential to double (excluding water areas) the land area delivery of any future country park implementation.
- The socio-economic benefits identify a training shortage in the Bucks economic report. There is significant support by Bucks' New university and Buckinghamshire College Group. Skills and training will be supported for a 10-year period. Compatibility with Bucks' local skills report, SIP (local skills improvement program), and support from educational institutions, including both senior schools, the British Film Commission, Great Marlow, and SWBGS, along with a commitment to work with all local institutions.
- Provision of a community hall for residents and a skills academy for industry. £750 million inward investment to Bucks, £338 million per annum GVA (gross value added) economic activity, and a minimum of 300 traineeships per annum in the first 5 years, as well as the creation of up to 4,180 new jobs. As part of this 780-2,415 jobs will be created through a variety of skill sets .
- It is noted that a sustainable travel strategy and investment has been a challenge in the area for the last few decades .The opportunity appears it can be accelerated through new public bus and hopper services, walking, and cycling provisions. Specifically, a new public bus that is proposed between High Wycombe and Maidenhead and a new East/West hopper bus service between Bourne End and Marlow. It is also noted that active travel commitment includes financial incentives for walking/cycling to studios, with government support for creative industries.
- We have noted the Economic growth and regeneration planning application response dated the 23rd of July 2022 in the application on behalf of the Bucks Council Directorate for planning, growth, and sustainability Bucks. This response puts forward an overwhelming argument detailing the support for the diversity and prosperity of the local economy overall, encouraging business, employment, and skills for Bucks, as well as the vibrancy benefits for local town and village centres.

*(Note: Eleven members attended this meeting on Wednesday, August 24th, out of 12 possible members. One member declared a conflict of interest with their role as a

member of Bucks Strategic Sites Committee and did not attend the meeting. Eight members voted in full support of the application, one member voted against support, and two members supported but did not wish to vote. Councillor Natalia Mityaeva asked for the submission to show that she does not support the application. Councillor Carol heap asked for the submission to show that she is neutral on the application The final vote was therefore declared at 8 to 3 in favour and carried.

Further Comments:

In my capacity as leader of Marlow Town Council I have reviewed a representation submission in detail made on my behalf by Cllr Scott dated the 6th of September 2023 to the planning portal which I approved and asked him to also submit on my behalf during my annual leave.

I am satisfied that the content of the collective representation and observation was clear but that some of the content was misleading in that it was not the case that Marlow Town Council informally consulted members.

By way of clarification this is to highlight that the comments made on 6 September 2023 were a collective view of the following Marlow constituency Councillors that wished to support this application by way of the detail provided, I have detailed the names of those below:

Cllr Tim Avery, Cllr David Brown, Cllr Roy Cadman, Cllr Chris Funnell, Cllr Chris Hoyle, Cllr Colleen Stapley, Cllr Richard Scott

I would be grateful if this amendment can be posted against this application unredacted and apologise to the public for any confusion this may have caused and for this error for which I am responsible.

Cookham Parish Council (Neighbouring Parish):

OBJECTION: We write to comment on this application. The Parish of Cookham has an obvious interest in that any such development will be a major feature of the view from Winter Hill within our Parish (part of an area of special landscape importance), may affect public transport services through our Parish, and is very likely to affect traffic flows across Cookham Bridge and therefore through the Cookham High Street Conservation Area.

Three members of our Planning Committee (including its Chairman and the Chairman of our General Purposes Committee) attended the applicant's exhibition in Marlow. They were grateful for the opportunity of talking to those present as well as looking at the exhibition. We have considered carefully the plans as submitted.

Regrettably, the Parish Council has come to the conclusion that it must in the interests of its residents oppose this development. We have a number of reasons for coming to this conclusion.

1. The development is said to be likely to create about 4,200 jobs (Planning Statement, para 9.35). While of course the Parish Council would welcome any concomitant improvement in the railway service, and indeed the bus service, through this Parish from Maidenhead station to Marlow and/or High Wycombe, in its view any such potential gain is substantially outweighed by the likely substantial increase in traffic.

Our first concern relates to traffic entering and leaving the site itself. We are not satisfied that the road network serving the site is or can easily be made adequate, particularly in respect of traffic heading east, towards and through Little Marlow and Bourne End. This is not directly our concern, but it raises very serious issues for us.

Much of such traffic is likely to come to and from the site from south of the Thames/Maidenhead (whether from housing or from the station) or from housing in or around Cookham. It would have to move over Cookham Bridge (which is single lane traffic, traffic light controlled, as you are no doubt aware) and through the Cookham High Street Conservation Area. Such traffic, once in Cookham, would either turn west through The Pound which is a very well-known traffic bottleneck with significant pedestrian safety issues, or continue south through the Riverside Conservation area in Maidenhead. Both would be seriously detrimental to the community of Cookham.

The existing levels of traffic result in significant queues, especially at rush hour (which is also, in the morning, drop-off time for Holy trinity primary School in the Conservation Area). Traffic jams and the traffic cause significant noise and fume pollution issues in the Conservation Area, as well as endangering pedestrians, including children, in the narrow streets. This will anyway be exacerbated by the developments in Slate Meadow and Hollands Farm north of the Thames with 850 homes, and new developments both in Cookham itself (approximately 270 homes over the next 10 years). This development would make things significantly worse. This is so both in respect of goods traffic, where there are already serious issues in lorries weighing more than the weight limit attempting to cross Cookham Bridge – no doubt many lorries would be needed to service your development - and also in car traffic. It will become significantly worse than at present due to the already planned increases in housing both immediately north of the bridge (at Slate Meadow and Hollands farm in Bourne End) and south of the bridge (at Lower Mount Farm in Cookham itself, and two other sites) already mentioned.

The extra traffic of both types created by the development would make an already very bad and worsening situation even significantly worse still. It would in our view trigger the NPPF threshold of 'severe' residual effect which should result in refusal.

2. The Parish Council is opposed to building in the green belt, particularly in an area hitherto protected by the "barrier" of the A404. It is irrelevant whether the building is a film studio project or any other kind of development. While we acknowledge the argument that the land is not of high quality, the fact is that it is green belt and the

Parish Council considers preservation of the green belt to be highly important for amenity reasons. There are in its view no very special circumstances relating to the project to justify overriding the protection of the green belt.

3. The sheer mass of the project as outlined is unacceptable. It involves a large number of enormous buildings, in terms of height and general volume as well as ground space. This point simply enhances the main argument against building in the green belt. However, it is also disproportionate and out of keeping with the small number of residential homes which would adjoin the development.
4. The development would seriously detract from the view from Winter Hill in our Parish. It will be a very substantial developed area in what is currently open land. We are aware that no one has a legal right to a view, but the openness of the green belt is one of its fundamental characteristics which the national planning policy framework seeks to protect. Views created by such openness are of particular importance when themselves viewed from areas of special landscape interest. Winter Hill adjoins such an area and deserves similar consideration, and as Common Land including rights of way the views from it are of planning relevance and should be protected. This applies both to residents and walkers using public pathways and National Trust walks.
5. This is particularly so considering solar panels on the roofs of the buildings. These are both unsightly in themselves when viewed from above, and very reflective. Those looking at them from the south/south-east as from Winter Hill in this Parish will see the development not only has large block like buildings intruding into the green belt but also buildings with glaring, reflective roofs. This aspect in particular would be seriously detrimental to the enjoyment of all walkers along the network of paths around Winter Hill in our Parish, but also to the amenities of our residents.
6. The noise which would emanate from the development would also be a significant detriment to residents of our Parish overlooking the site. The noise from the A404 is already an issue for housing overlooking it and the site. The noise which would emanate from your development both in terms of traffic movements and work taking place on the site would add to this problem.
7. Both the noise and night lighting, especially on the potential out-door sets, could be seriously detrimental to wild-life and bio-diversity in our Parish as well as on and immediately adjacent to the site itself.
8. We believe that the water run-off and other drainage effects of the development, covering what are currently open fields which help absorb rainfall, would be seriously detrimental to the floodplain between the site and the river and consequently potentially to Cookham and those of its residents living in the floodplain. It is important that the land be left to absorb rainfall as part of the natural defences against flooding. The development is likely to cause a serious

reduction in the ability of the land by Marlow to absorb rainfall and protect downstream Cookham. This is particularly so in view of the role already played by the areas of water to the south of the site which are used to absorb water from the area and estate around the Crowne Plaza Hotel.

9. Finally, we note that a very large planning application at Bray Studios has just been permitted by the Royal Borough of Windsor and Maidenhead. We also note that an even larger planning application has just been made by Pinewood Studios at Iver Heath. While we appreciate the argument that a cluster of such studios may assist the development of talent and expertise in this country and this area, we are compelled to the view that a third such development would represent over-provision of such facilities, leading eventually to its decline and the need to redevelop the site. Since we would oppose such redevelopment, we are also opposed to any development which might have that outcome.

Though it is not our direct concern, we are concerned about what seems to us must be the significant loss of amenity for the homes already within the proposed site, including noise, traffic, overlooking/loss of privacy, loss of open space and so on.

Regrettably, we do not believe that these objections can be removed by cosmetic or minor changes to the proposed development. Accordingly, we object to this or any similar development on this site.

Consultation Responses

Internal BC Responses:

BC Environmental Protection (Contaminated Land):

I can confirm that the investigations that have been undertaken to date are sufficient and that the proposed remediation strategy is considered to be acceptable.

It would be prudent to request that the Ground Gas Design Report be submitted for review once it has been prepared.

I would recommend that the following conditions be applied to any permission granted:

1. 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>.

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

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

BC Environmental Protection (Control of Pollution):

The proposed development has been considered by the Environmental Protection team who have carried out this consultation

Noise and light disturbance, as well as the effect on air quality has been considered.

In terms of air quality effect, we accept the developer's assessment of the potential effects of the development on local air quality and would support their intention to contribute to projects that will assist with reducing emissions. We also support the intention of the developer to install active electric vehicle charging points for 20% of parking spaces, with the remaining 80% of parking spaces having passive electric vehicle charging points that will allow for 100% of parking spaces to benefit from electric vehicle charging points if required in the future. The electric vehicle charging points should be conditioned.

The development's proposed lighting scheme and strategy has been designed to minimise light spill and would be deemed acceptable. It is not expected to cause any disturbance to neighbouring residents.

Noise from the development, particularly noise associated with filming, set construction and plant, has the greatest potential impact on neighbouring properties. A lot of these noise sources are unknown or variable in nature. To protect the amenity of residents in the vicinity, a noise management plan should be submitted prior to the occupation of the site, and details of plant should be submitted for planning approval prior to its installation.

Environmental Health therefore objects unless the following conditions are imposed

No Further Plant/Machinery

Notwithstanding the provisions of Article 3 of the Town & Country Planning (General Permitted Development) Order 1995 (as amended), no further plant or machinery shall be erected on the site under or in accordance with Part 8 of Schedule 2 to that Order without planning permission from the Local Planning Authority.

Reason.

To enable the Local Planning Authority to consider the likely impact of the new plant or machinery on the amenities of nearby residential properties.

Control of Noise

No development shall take place before a noise management plan, incorporating a plan for both the construction and operational phase, has been submitted to and approved in writing by the Local Planning Authority which specifies the provisions to be made for the control of noise emanating from the site. Thereafter, the use shall comply with the approved scheme.

Reason.

To protect the occupants of nearby residential properties from noise disturbance.

Electric Vehicle Charging Points

Prior to the occupation of the development hereby permitted, 20% of parking spaces must be provided with an electric vehicle charging point with a minimum rating of 32amp. The remaining parking spaces must be provided with passive installation of electric vehicle charging points which will allow for 100% provision of electric vehicle charging points in future if the need arises.

Reason – to comply with the air quality SPD and, to reduce the carbon emissions and the impact on the health of Nitrogen Dioxide emissions from the development.

This memo does not include comments relating to air quality and contaminated land, where relevant, these comments will be provided separately.

BC Heritage:

Heritage Assets Affected

Settings of:

- • Westhorpe House – Grade II listed building.
- • Corner Cottage – Grade II listed building
- • Little Marlow Conservation Area

The 36-hectare site is located to the east of the A404 and on the south side of the Marlow Road. The site is situated on the former parkland historically associated with, and in the setting of, Westhorpe House; a prestigious listed building (Grade II) immediately outside the site boundaries but effectively surrounded by it on 3 sides.

Section 5, Fig 5.29 in the D&AS indicates that the Zone of Theoretical Visibility extends as far as central/eastern Marlow to the west, Bourne End and Well End to the east, and Cookham Dean/Winter Hill, in the adjacent District to the south, covering multiple heritage assets including listed buildings, conservation areas and non-designated heritage assets. The effect on the settings of many of these heritage assets will be neutral/negligible. However, as discussed in the Heritage Statement, the three designated heritage assets most affected by the proposal are: Westhorpe House; Corner Cottage, a Grade II listed building which dates from the 17th century lies just over 100m to the south, and approximately 500m to the east is Little Marlow Conservation Area.

Designed parks and gardens can also be considered non-designated heritage assets. It is acknowledged that the character of Westhorpe House's parkland has been compromised during the C20 and is unlikely to meet the Bucks local listing criteria.

Heritage Assessment

The proposals do not physically impact the built fabric of either listed buildings or the designated conservation area. The heritage assessment therefore relates to whether the application affects the significance of the designated heritage assets through development in their settings.

Westhorpe House (Grade II listed building)

Westhorpe House and the attached service wing were built in the early 1700s with C19 and C20 alterations and extensions. It was built by James Chase, (c. 1650 – 23 June 1721), who succeeded his father as Court Apothecary during the reigns of King William III, Queen Anne and King George I. He was a Whig politician and elected as Member of Parliament for Marlow between 1690 to 1710. The house, a very early example of the Palladian classical style in Buckinghamshire, and indeed the whole of England, is a property of distinction, and commensurate with his standing in society.

The principal elevation is well proportioned and sophisticated. The rendered 7 bay, three storey façade articulated by the shallow plinth, first floor band course and moulded cornice with stone balustrade above, partly masking the roof. The wider, outer bays have flanking pilasters. The central 3-bay arcaded portico and single-storey bowed projection on the garden front were added in the early 19th century.

The service wing attached to rear left corner is 2 storeys and also colour washed with hipped tile roof course. A substantial, modern wing was built at the rear in the 1980s and is not of architectural or historic importance.

Westhorpe House evolved over the years to form the centrepiece of the extensive surrounding estate. As befitted an owner of eminence and means, over the C18 and C19 centuries the estate grew to incorporate the pleasure gardens immediately surrounding the house, a lodge and an area of parkland to the north through which the carriage way crossed to continue onto the Marlow Road, orchards and meadows, walled garden, water course, dovecote and associated farmland and buildings.

A decline in fortunes during in the 20th century saw the estate fragmented and some deterioration of the historic environment. The house fell into a semi-derelict condition

during the 1950s and the large modern extension was permitted in the 1980s, in part to make it viable for use as an office headquarters. More recently, the house has been subdivided into self-contained apartments.

The building's significance was recognised in 1955 when it was added to the national list of buildings of architectural and historical importance. The submitted Heritage Statement suggests that the building now falls short of its listed status and that for the purposes of the application it should be downgraded from national (high) importance to medium. There would not appear to have been an application to de-list the building and in my opinion, such an application would not be successful in view of the building's surviving historical and architectural interest.

Furthermore, its significance is enhanced by the contribution of the surrounding estate to its setting. While still comprising open land, fields, and water courses, it is acknowledged that gravel extraction and subsequent landfill operations have impacted on the character of the parkland and the park home site is incongruous within the walled garden. The parkland trees have been removed to a large extent. Unmanaged ornamental planting has grown so that only glimpses of the house are gained from outside the immediate gardens. The A404 impinges on the western boundary and that the lodge was lost to the construction of the Marlow junction. Lack of environmental management has created areas of neglected landscape which require improvement but presumably the land should have been restored on cessation of the mineral operations. However, the parkland remains undeveloped open land and the ability to appreciate the house and the general structure of the landscape remains intact, despite the house now being divorced in ownership from its wider estate. In views from public vantage points from Winter Hill and the public footpath network, it remains legible as the principle building in the landscape which is largely devoid of unrelated built form and its significance is enhanced by its former associated buildings and structures, parkland remnants, the drive approach and entrance triangle, and the open character of the wider landscape.

Corners Cottage (Grade II listed)

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

Little Marlow Conservation Area (LMCA) – Designated Heritage Asset

Little Marlow is an attractive, compact village that extends south from the Marlow - Bourne End road, to the stream running parallel to the River Thames. The parish church and Manor House form the focus of the village and there are 20 listed buildings within the settlement. Fields and arable land surround the village and it remains remarkably coherent with little modern development within or around it. The village is regarded as one of the most

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

The Development Proposals

The proposed development of the film studios extends to nearly 170,000 sq m and comprises large scale blocks of built form on land to the north Westhorpe House and wrap around the building to the south and west. The development would be built over the former parkland which was historically associated with the house. The buildings in closest proximity to Westhorpe House include workshop/offices 30m to the north of the site boundary, the Studio Hub to the northeast, and the Culture and Skills Academy and the Backlot are located to the west and southwest respectively. A large roundabout provides access to the site and the existing northern boundary vegetation is removed. The existing driveway becomes the main spine road through the site. It is increased in width to 7-8m, extends around the entrance triangle to Westhorpe House and continues south across a new bridge over the water course to connect through to the Backlot. The development of Plot 2a, to the east of Westhorpe House and closest to Corners Cottage, comprises a community building, further workshops/offices, a multi-story carpark and sound stage.

Impact of the Development on the settings of the Heritage Assets

Westhorpe House

The site surrounding Westhorpe House has long been associated with the property since its construction in the early C18th. Although the ownership of the park is now divorced from the house and the parkland character diminished, the site makes an important contribution to the significance of the building. It forms a spacious, open setting which allows the building to be appreciated as an important asset at the centre of a historic estate and the long driveway approach heightens the experience.

Issues:

1. Amount and disposition of development on the listed building's former parkland

Para 2.4.1 of The Little Marlow Gravel Pits SPD (2002) describes the 1st Ed OS Plan which illustrated the area between 1882-83 as *'highlighting the strong historic associations. The key landscape features of this time include the parkland settings of the Manor House and Westhorpe House. Westhorpe House, in particular, had a strong parkland setting with the watercourse being an important feature of this landscape. Only remnant areas of this landscape remain with the northern part of the grounds lost and being subject to gravel extraction and landfill.*

Para 2.4.2 continues: *'A strong network of hedgerow and tree belts existed at this time. Many of these landscape elements remain today showing an historic association with past land uses. The general structure of this landscape has remained intact with much of the gravel workings respecting the historic field pattern'*.

This strong relationship of the existing buildings to historic landscape features and the parkland was obviously extant in 2002 and much of this framework remains legible today. In comparison, the proposed development would encircle Westhorpe House on three sides and the proposed dispersal of development would cover almost the entirety of its former

parkland in built form. This would permanently and irrevocably change the character of the open landscape of the wider setting of the listed building. The legibility and structure of the historic environment would be eradicated.

The existing landscape is potentially capable of restoration to a more pastoral appearance, and indeed, is likely to be enhanced if the site were developed in accordance with Policy RUR4. Consequently, the development of this amount, scale and density of built form would adversely affect the significance of Westhorpe House.

2. Scale and Massing of proposed buildings

While an attempt has been made to mitigate the impact of the development by placing the 'smallest' buildings at the edges, the scale of the individual buildings is substantial. The 4 workshop/offices adjacent to the southern boundary of plot 3 range from 55m to 61m in length and are 15m in height. Soundstages are of an even more considerable scale (the sound stage on plot 2a is 73m x 50m and 21m in height to the PV panels on the roof). As the ground contamination requires an appropriate response, the buildings are likely to be built up on platforms, increasing the height further.

The scale of even the small buildings dwarfs the scale of Westhorpe House which in most scenarios would be considered a sizeable building: the main elevation extends to 22m and the height to the ridge is 15m but this scale is overwhelmed by the sheer size, number and dispersal of the proposed buildings on site. As such, the legibility of the building being the centrepiece of the estate surrounded by open land would be lost. Instead, the placement and orientation of buildings and roads seems intent on ignoring the existing buildings rather than incorporating them positively into proposals.

3. Building Design and Function

Two substantial, landmark buildings within the Studio complex are located within close proximity to Westhorpe House. The Studio Hub, described as 'the heart of the scheme', is located immediately beyond the listed building's garden curtilage and is designed as the focal point of the development with a deliberately eye-catching scale and design. The Culture and Skills Academy, aligned with the house's garden front also utilises an arresting design. Rather than 'highlighting the assets significance within the landscape', they will distract attention away from Westhorpe House. The location, scale and design of these buildings challenge the prominence and primacy of the listed building as the principle building within its the landscape, eroding its significance.

The description and plan of Plot 5 as an open green area screened by planting (pg 286 DAS) conflicts with information about the backlot (pg 121 DAS). This confirms that 'outdoor sets will generally be under 15m...occasionally some productions might require higher structures...'. The image at Fig 6.5 (pg 89 DAS) indicates that taller cranes, scaffolding and flood lighting are likely to be required. It is accepted that the sets are temporary in nature, but no time periods are specified. While on site, the sets are potentially of such a scale they will further detract from the setting of the listed building.

The northern boundary and access into the site have been redesigned on the amended masterplan.

The entrance into the site is dominated by a highway-engineered roundabout which, together with the loss of the existing boundary tree belt, the lack of space for any meaningful replacement landscape, the proposed northern boundary security fence up to 3m in height and the almost continuous frontage of 15m high office/workshops, further exacerbates the visual impact of the built form. The scale, density and form of such development is utterly incongruous as the approach to a sizable country house and will be perceived as urban sprawl of Marlow and encroachment into the adjacent countryside.

4. Visual Impact of the development

The Heritage Statement emphasises the screening effect of the landscape buffer around the pleasure garden which defines Westhorpe House's immediate setting. This situation largely arises through lack of management of the trees and woodland: historic maps show that the planting was historically more open, allowing views across the parkland from the house and gardens.

The lack of inter-visibility between the listed building and the surrounding development provided by this screening is stressed, despite Historic England advice and case law confirming the importance attached to setting of a building is not solely contingent on its visibility from public vantage points. It should also be borne in mind that the existing landscaping around the house includes mature trees; I will defer to the council's tree officer on their life expectancy, but landscaping is not necessarily permanent and there will be inevitable changes to the density of the planting over time, as trees mature and die back. This screening is also dependant on landscaping that is not within the site boundaries and therefore beyond the applicant's control.

At pre-application stage, sections through the site were requested to demonstrate the extent that the development would be seen from the gardens and from within the house. The site section B-B (Fig 6.52 in the D&AS) is diagrammatic and takes a favourable section. As such, it does not confirm that the development will not be apparent in views from the house or within the immediate gardens setting of the house. Nevertheless, as shown in the photomontages for Viewpoints 14 and 15 in the LVIA, development will be clearly and dramatically visible from the entrance triangle adjacent to the gardens.

The density of plots 1,2a, 2b and 3 leaves little spacing between blocks or around the edges for meaningful landscaping. New landscaping will take time to establish as indicated on pg 292 of the DAS which illustrates anticipated tree growth. Large standard trees are expected to reach a height of 10m within a 15-year period. The smaller workshop/office buildings are 15m in height and the Studio Hub and proposed sound stages are even taller. Consequently, even where trees are incorporated into the landscape masterplan, the planting will take a considerable period to reach maturity and provide screening.

5. Increased activity and changes to the experience within the setting

The experience of approaching the house along the line of its historic driveway will also be radically changed. The existing trees and gateway would be replaced on the northern boundary with a dominant, highway-engineered roundabout, a 2.4m-3m high security fence

and an almost continuous frontage of 15m high office/workshops. Whereas the existing long driveway through open land increases the anticipation of arriving at an important country house, the approach experience is along the main road (8.9m wide at the entrance: Fig 8.52, pg 278 DAS) through the studio complex with substantial buildings lining both sides of the route. It is acknowledged that the alignment of the historic drive will remain and that a landscape buffer is proposed on either side of the road but the roundabout, scale of the buildings and the high security fencing are uncharacteristic of the established context.

The increased on-site activity and the noise, lighting and movement generated, will also detrimentally impact the building's setting. The number of vehicle movements will increase dramatically. The road linking plots 4 and 5 is designed to be wide enough for two 16.5m articulated lorries to pass in an area where there is currently no vehicular access. The noise and movement is likely to affect the amenity of the pleasure gardens.

The cumulative effect of the development therefore harms the significance of Westhorpe House from its position as the centrepiece of its estate by the construction of landmark buildings and substantial blocks of development on its former parkland, overwhelming the listed building's wider setting and erasing the legibility of the historic environment. It is unfortunate that Westhorpe House is not within the ownership of the applicant and that incorporating the building (together with associated features including the coach house and walled garden) into the development proposals is not achievable. Had the film studios incorporated the listed building positively within the proposals, the impact could have been mitigated to a degree: the house could have been designed as the focal point of the development, continuing the role it enjoyed for over three centuries. Performing the function of the Studio Hub could have negated the requirement for the landmark building in close vicinity and the Cultural and Arts Centre reflected the design of traditional estate buildings.

Nonetheless, it is accepted that there has been some mitigation to reduce the impact and that the existing character of the landscape has been degraded to a degree. Consequently, the harm arising would be less than substantial. This is the same conclusion reached in the Heritage Statement which I agree with.

Para 199 NPPF differentiates between substantial harm, total loss and less than substantial harm to the significance of a heritage asset. It does not seek to elicit a sliding scale of harm within each categories.

However, the Heritage Statement, while accepting that the proposals cause less than substantial harm, downplays the magnitude of harm is in the light of the above issues. Using the same methodology for the impact as set out in the ES at Chapter 15, the effect of the development would be Moderate/Large in value. This arises as the sensitivity of the statutory Grade II listed building is of High importance. By reducing the impact magnitude /change to Moderate Adverse rather than Major Adverse as a consequence of the extant character/mitigation, the Significance of the Effect Matrix (Table 15.5) assesses a Moderate/Large Impact. Para 15.30 confirms the effects would be significant. On this basis, for the purposes of para 202 of the NPPF, the impact of the proposals on the significance of the setting of Westhorpe House would be Less than Substantial: High.

Corners Cottage

The site is not directly associated with Corner Cottage but provides an incidental tranquil and open setting for this C17th timber framed rural cottage and enjoys the benefits of the rural landscape in its wider setting. The effect of the development will transform this context and urbanise its surroundings, harming the significance of its setting. I agree with the conclusions of the Heritage Statement that the harm would be less than substantial and of a lower magnitude than Westhorpe House.

Little Marlow Conservation Area (LMCA)

LMCA benefits from the fields and countryside that extend from its western boundary, helping reinforce the village character and rural context. Views towards the development in proximity of the LMCA are rendered in Viewpoints N and O in the LVIA. The eastern boundary landscape buffer within the development is only 10m wide including the existing hedgerow (pg 273 DAS) while the existing trees are outside the development boundary and are therefore not within the control of the applicant. I will defer to my landscape and tree colleagues on the adequacy of this proposal, but it does not appear particularly generous for the species of very large trees that would be required to provide meaningful screening to the 16m high buildings plus 3m platform above existing ground levels proposed adjacent to this boundary. Anticipated tree growth of 10m in 15 years means any tree planting would take a significant period before adequate screening would be reached. Softening the visual impact by training plants on wires would offer limited visual mitigation, particularly if brightly coloured cladding is incorporated into the design as illustrated at Fig 7.17 (pg 163 DAS). The blocks of development would be evident above the tree line and visible from public viewpoints in proximity of the conservation area, adversely affecting the character of its setting. I therefore agree with the Heritage Statement that the development would cause less than substantial harm to this designated heritage asset.

Heritage Policy Assessment

The Planning (Listed Building and Conservation Areas) Act 1990

Section 66 of the Planning (Listed Buildings Conservation Areas) Act 1990 places a duty on the LPA to have special regard to the desirability of preserving listed building or their settings or any features of special architectural or historic interest which it possesses. As discussed above, the scale, height amount and dispersion of the development would not preserve the settings of the listed buildings and therefore the proposals fail to comply with section 66 of the Act.

NPPF

Para 199 of the NPPF requires that great weight should be given to the conservation of designated heritage assets. Para 200 confirms that harm to the significance of a designated heritage asset can arise from its alteration or destruction, or from development within its setting. Any harm should require clear and convincing justification. The harm would be less than substantial and of a high magnitude in relation to the setting of Westhorpe House. The

impact would be less than substantial but of a lower magnitude to the settings of Corner Cottage and LMCA.

Para 202 requires that this harm should be outweighed by public benefits. Appendix 1A highlights the economic benefit of the film industry on heritage assets in general. However, the film studios would contribute nothing directly to the identified heritage assets. Indeed, far from enhancing their presentation, their settings would be permanently and profoundly altered by the amount, scale and appearance of the development.

Wycombe District Local Plan 2019

Policy DM31 of Wycombe District Local Plan states that all development is required to conserve and where possible enhance the historic environment. Bullet 5 requires that where development would lead to less than substantial harm to the significance of a designated heritage asset, consent will be refused unless this harm is outweighed by the public benefits of the proposal, including securing its optimum viable use.

Table ESA 18: Summary of Likely Significant Effects, Mitigation Measures and Likely Residual Effects (Historic Environment) (pg 63, Chapter 15 of the Addendum to the Environmental Statement) confirms that in the applicant's opinion the impact of the development on the Historic Environment causes less than substantial harm. Similarly, my assessment of the proposals as stated above remains that the proposal causes less than substantial harm to the setting of three designated heritage assets and in accordance with this policy, the harm should be outweighed by the public benefits including, where appropriate, securing its optimum viable use, in the planning balance.

RUR4 – Little Marlow Lakes Country Park

This policy confirms that *'Planning permission will not be granted for development within the Country Park that that has an adverse effect upon the amenities or setting {of}adjoining conservation areas, or listed buildings'*.

As discussed above, the impact of the development fundamentally changes the character of the settings of the designated heritage assets and causes harm to their significance. The application is therefore contrary to this policy.

Conclusion

For the reasons given above, the application does not comply with the Act, relevant heritage policy and advice. It is recommended for refusal on heritage grounds unless the harm is outweighed by the public benefits of the proposal including, where appropriate, securing its optimum viable use..

Appendix 1a and 1b (The Benefits of New Studios on Local Heritage and Landscape) of the Planning Statement Addendum highlights the income and wider public interest generated in the historic environment as a consequence of filming at heritage sites. While this is of public benefit, the income is not secured; at least a proportion of the anticipated investment could be generated from other existing or proposed sites; and the optimum use of the site could avoid harm to the assets. Presumably this information was also taken into account when

Table ESA 18 was updated by the applicants. Consequently, the application is recommended for refusal on heritage grounds unless the identified harm to the heritage assets is outweighed by the public benefits of the proposal, including, where appropriate, securing the site's optimum viable use.

BC Highways:

Latest Comments:

The Highway Authority (HA) has provided a number of previous consultation responses in relation to this application, the latest being in a letter dated 11th August 2023 that responded to information contained within the second Transport Assessment Addendum (TAA2). The applicant has now submitted a Supplementary Transport Assessment (STA) that seeks to deal with the issues that were not fully covered within TAA2.

To confirm, the issues that were considered to be outstanding following the review of the TAA2 documents related to traffic impact, car parking, layout, sustainable travel, connectivity and mitigation. The information contained within the STA documents seeks to deal with some of these issues and I will therefore provide comments on that information below.

Paragraph 1.3 of the STA confirms that the document updates and provides additional information with respect to transport and presents the outputs of additional technical work and supplementary traffic modelling in support of the development proposals. Confirmation of what the STA provides is as follows:

- Additional information to support the internal layout design.
- An updated Travel Plan.
- Updates to the proposed improvements for pedestrians and cyclists including the completed WCHAR assessment.
- An explanation of how offsite on-street parking will be monitored and the measures taken if there is an increase in on-street parking associated with the proposed development.
- An update on 2023 traffic surveys undertaken.
- Presentation of the updated modelling of the site access and proposed improvements to the Westhorpe Interchange using the approved VISSIM model.
- Details of the modelling of the identified junctions on the wider highway network in Marlow and Bourne End, and on the A404 (M40 Junction 4 Handy Cross, Bisham Roundabout).
- Details of the assessment of identified areas on the wider highway network.

I will now provide comments on the specific detail contained within the STA and I will include these under the same headings used in the document for ease of reference.

Internal Layout

The internal layout has been previously discussed with the applicant and comments relating to the latest site layout, included in TAA2, and the associated tracking provided are included

in my response to TAA2. In that previous response I raised a number of concerns relating to the tracking of vehicles through the site and how vehicle movements within the site would be managed.

In paragraph 1.11 of the STA the applicant has confirmed the following:

“The position with respect to the internal layout of the Site, as set out in Section 1 of TAA2, remains current and is materially unchanged. This STA does not therefore seek to replicate that information other than to reiterate that the internal layout of the site will remain within the private ownership and control of the Applicant.”

The HA has previously confirmed its position in relation to the site remaining in private ownership and still considered that the site layout should be safe and suitable. This is supported by paragraph 130 of the NPPF, which states the following:

130. Planning policies and decisions should ensure that developments:
- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
 - d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
 - e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
 - f) 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 users⁴⁹; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

As the applicant has confirmed that the internal details submitted have not materially changed when compared to the details submitted as part of TAA2, the HA’s comments given in the response to TAA2 remain applicable.

The applicant has provided some additional information on a few of the points raised. The main comment is that the applicant states that a Site Management Plan will be prepared to outline how vehicles are expected to operate whilst on site, including the use of supervised manoeuvres. The HA confirmed that it would expect to see a Site Management Plan to detail how the internal workings of the site will operate, however one is not provided as part of this application. As this is a detailed application, the HA and LPA should have the opportunity to consider this information to ensure that adequate detail is provided and the proposed operation of the site is safe and suitable. Without this information the HA is not in a position to confirm that this is the case.

In paragraph 1.13 of the STA the application refers to comments that they have received from the HA, which were given during a meeting following an initial review of the vehicle tracking details submitted with TAA2. I would just like to cover a few of these points here.

Firstly, the applicant refers to comments made in relation to the ground floor of the western section of the northern car park. The response to TAA2 highlighted that no tracking had been provided for this section of the northern car park, and the applicant has confirmed that this part of the car park is for the electrical substation and a flexible space, therefore it does not accommodate vehicle parking. However, the details of the plan submitted for this part of the car park, shown on drawing number 60654980-ACM-XX-XX-SK-HW-000055, would suggest that vehicles would at least pass through the car park. Details have not been provided to show how this would occur.

Another comment the applicant has responded to relates to the tracking provided for the ground floor of the southern car park. The previous plans submitted did not show how the two spaces adjacent to the Car Park Pavilion would be accessed, with the drawing also showing that the Pavilion door opened outwards into the car park. The latest version of plan number 60654980-ACM-XX-XX-SK-HW-000055 Rev P03, shows the door that did open into the car park removed. The plan also provides tracking of vehicles accessing the places adjacent to the Pavilion, however the tracking of the standard parking space in this location appears to show the vehicle only being able to park right up against the southern edge of the parking space, resulting in possible difficulties for people to utilise the doors on whichever side of the car is located on that side of the parking space. It is evident that this part of the car park may require further adjustment.

One further point raised in the HA comments for TAA2 related to the tracking of an HGV exiting the site and onto the new roundabout access junction which showed that an HGV would accommodate much of the carriageway through the bend leading to the roundabout, which would have the potential to impact on the ability of other vehicles to utilise the full two lane approach. There was concern that this had not been taken into account in the VISSIM modelling as the modelling appeared to include vehicles as PCU's rather than showing cars and HGV's as different size vehicles. It is evident in the latest submissions that the applicant has now revised the modelling to show cars and HGV's as different vehicles, thereby taking into account the different impact that a larger HGV may have on the network.

When taking the above comments into account it is evident that sufficient detail has not been submitted at this stage to allow the HA to determine that the internal site layout is safe and suitable.

Sustainable Travel Strategy

Travel Plan

It is confirmed within the STA that the Travel Plan submitted in May 22 as part of the original application information has been updated to reflect ongoing consultation with the Highway Authority and refinement of the Sustainable Transport Strategy (STS) for the site. The updated

TP has been sent to Travel Planning colleagues in the Council for comment they have provided their response, which is appended to this letter.

The comments conclude that the Travel Plan is well thought out with some good detail, however it is evident that there are a number of amendments and additional information requested in the review which are important to ensure that the Travel Plan is effective.

Public Transport

The bus service improvement information contained within the STA is consistent with that previously included within TAA2. The submitted information has been considered by the Council's Public Transport section and they have provided comments, which I will summarise below:

- "In principle, the suggested service provision on the main Marlow-High Wycombe service would provide a good level of connectivity to and from the site. This links to High Wycombe town centre, High Wycombe Coachway (where it can meet coaches from Oxford, Heathrow, Gatwick and Central London) and Maidenhead. The applicant should have considered whether the addition of a stop at High Wycombe railway station would be worth providing. The indicative timetable would appear to allow time for this.
- There are concerns that the running time of 35-minutes between High Wycombe and Maidenhead is somewhat optimistic, in particular the running time between High Wycombe and Marlow.
- Where the service will specifically stop is to be determined, but it is assumed from the information provided that this will be limited stop. The submitted information does not provide detail on the nature of the technology and decision making that will dictate the variable routing between Marlow and Maidenhead. There is insufficient information in order to confirm whether the service will be delivered directly by the development in conjunction with an operator rather than through contribution to the Council and the time period for this commitment. The inference is that this will be provided in perpetuity.
- It is not evident that synergies with the existing bus market have been explored to avoid duplicating resource.
- Similarly the provision of a local route within Marlow and Bourne End is to be welcomed, however it is unclear from the information submitted as to whether this can, in time, replace the existing Marlow town bus service.

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

Operational Management Plan

The STA includes a proposal by the applicant to provide a Operational Management Plan which will set out how the “Managed” traffic assessment undertaken in the transport work submitted to date will be achieved through operational management. There does not appear to be any detail of this Plan and I am not aware of the detail being provided previously. At this stage I am therefore unable to comment on the measures that the applicant intends to include and their potential effectiveness.

Active Travel Strategy

I have previously provided comments on the Active Travel Strategy proposed by the applicants in my responses to the original TA, the TAA and the TAA2. My comments in relation to TAA2 detailed my considerations of the Pedestrian and Cycle Audit previously carried out by the applicant. It is evident from my previous comments that the Audit carried out by the applicant lacked the detail necessary in order to the Highway Authority (HA) to determine that the proposed pedestrian and cycle routes were adequate and provided safe and suitable links between the site and the surrounding residential areas.

The applicant has therefore carried out a further assessment of the pedestrian and cycle routes called a ‘Walking Cycling and Horse-Riding Assessment and Review’ (WCHAR), in accordance with the requirements set out in the Design Manual for Roads and Bridges document GG 142.

The WCHAR assessment has been reviewed and comments detailing the HA’s considerations are included below. The full WCHAR assessment is included in Appendix E of the STA.

Comments on WCHAR Assessment

As per the requirements of the GG 142 document, collision data needs to be investigated as part of assessment and this should include a review of personal collision data for the latest available period and a minimum of three years needs to be studied to identify any collision cluster sites and trends that can influence or impact the highway scheme.

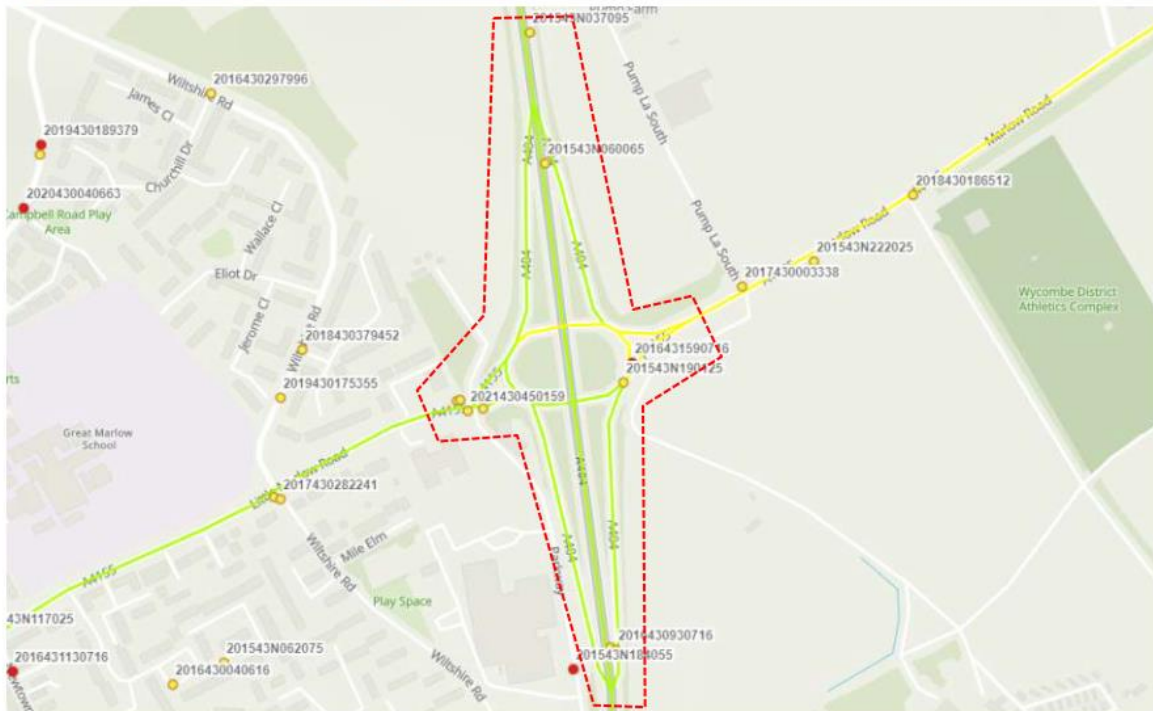
The applicant has used Crashmap to review the data for the last five years and has stated that their analysis showed that there were only 22 collisions in the identified study area that resulted in 17 slight injuries and five serious injuries. Five of these collisions however involved cyclists.

Paragraph 2.6 of the WCHAR assessment states:

“It should be noted that at the request of NH / BC, a further investigation into collision data has been undertaken and is provided separately to this audit to support the application”.

The applicant has carried out an assessment of PIC data for the three main junctions on the Strategic Road Network in the ‘Briefing Note: Strategic Road Network (SRN) Junctions – Personal Injury Accident Analysis’ document in Appendix M of the STA and this includes the Westhorpe Interchange. The study period covered is from January 2015 to December 2021 with the study area confirmed in Figure 3 on page 5 of the Briefing Note, included below for confirmation.

Figure 3: Westhorpe Interchange – Study Area



During the seven year period 10 PIA’s were noted at the junction of which nine were categorised as slight and one serious. The serious collision occurred in 2016 and was a shunt type collision.

The review of collision data does not appear to demonstrate that there is any serious collision cluster in the last five years in the vicinity of the site or the Westhorpe Interchange.

Multimodal Transport Services and Interchange Information

The WCHAR assessment states that the nearest existing bus stops are located around 430 metres east of the Site access on the A4155 Marlow Road at Winchbottom Lane. However, it is understood that these stops are served by infrequent bus services only. The nearest stops with regular services are located 700m from the site at Wiltshire Road. These stops are served by the Arriva Buses 800/850 route between High Wycombe, Marlow, Henley, and Reading

which operates on a weekday 20-minute frequency, Saturdays at a 30-minute frequency, and Sundays at an hourly frequency.

The CIHT 'Buses in Urban Developments' (2018) provides guidance on the recommended maximum walking distance to bus stops. The guidance recommends that for '*core bus corridors with two or more high-frequency services*' the maximum recommended distance is 500m and for '*less frequent routes*' the maximum recommended distance is 300m.

It is to be noted that both these bus stops fall outside the desired walking range and have been measured from the proposed site access. Although not mentioned in the WCHAR assessment, the HA is aware that a new bus interchange is proposed as part of the proposed development, which is to be located at the Entrance Square. The proposed bus interchange will result in bus stops serving the site that are within a reasonable walking distance of the majority of the site.

Marlow Railway Station is located 1.8km from the site. Four routes have been investigated for cyclists but other than the plans showing the improvements on Westhorpe Interchange junction seeking to make the route attractive for cyclists, the proposals for all three remaining routes appear to have been identified as opportunities that can be implemented either in the medium term or by the applicant providing financial contributions for the Council to carry out improvements. The applicant has not defined a time period for the 'medium term', therefore it is not known if and when these proposals identified as 'opportunities' could be delivered. The HA would also require the applicant to carry out any highway works to deliver any identified opportunities rather than the applicant providing a contribution, due to the risk involved to the Council.

Bourne End station is approx. 3.8km from the site access. However, no information has been provided in terms of the attractiveness of the existing route for cyclists traveling between the site and Bourne End station. It is to be noted that this is an important interchange as people from Marlow will have to change train here if they want to travel to Maidenhead and further afield as the Marlow line is a single track line operating only between Marlow and Maidenhead.

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

In summary, the proposed development is not providing adequate improvements in order to exploit opportunities for the use of sustainable transport modes. The site is reliant primarily on the pedestrian/cycle route via Westhorpe, the improvements to which are yet to be agreed with NH and confirmed to be deliverable. Even if it were deliverable, the lack of

certainty that additional routes for all users to ensure the site is permeable and well connected given its size call in to question the sustainability of the site and the prospects of it being able to meet its mode shift aspirations.

Trip Generators

GG 142 Walking, cycling and horse-riding assessment and review guidelines require key trip generators and local amenities to be identified to identify key desire lines for pedestrians, cyclists and equestrians and requires assessments to also include future committed development, including any improvements to multi modal transport services, interchanges and facilities. The applicant has carried out this analysis and has predicted that the highest proportion of trips would route westbound from the site via the Westhorpe Interchange, with the remaining trips routing to Marlow via Volvo footbridge and/or the New Link through Fieldhouse Lane. There are also a proportion of trips that have been forecasted to route towards the east from the site via the A4155.

Para 2.22 of the WCHAR assessment states:

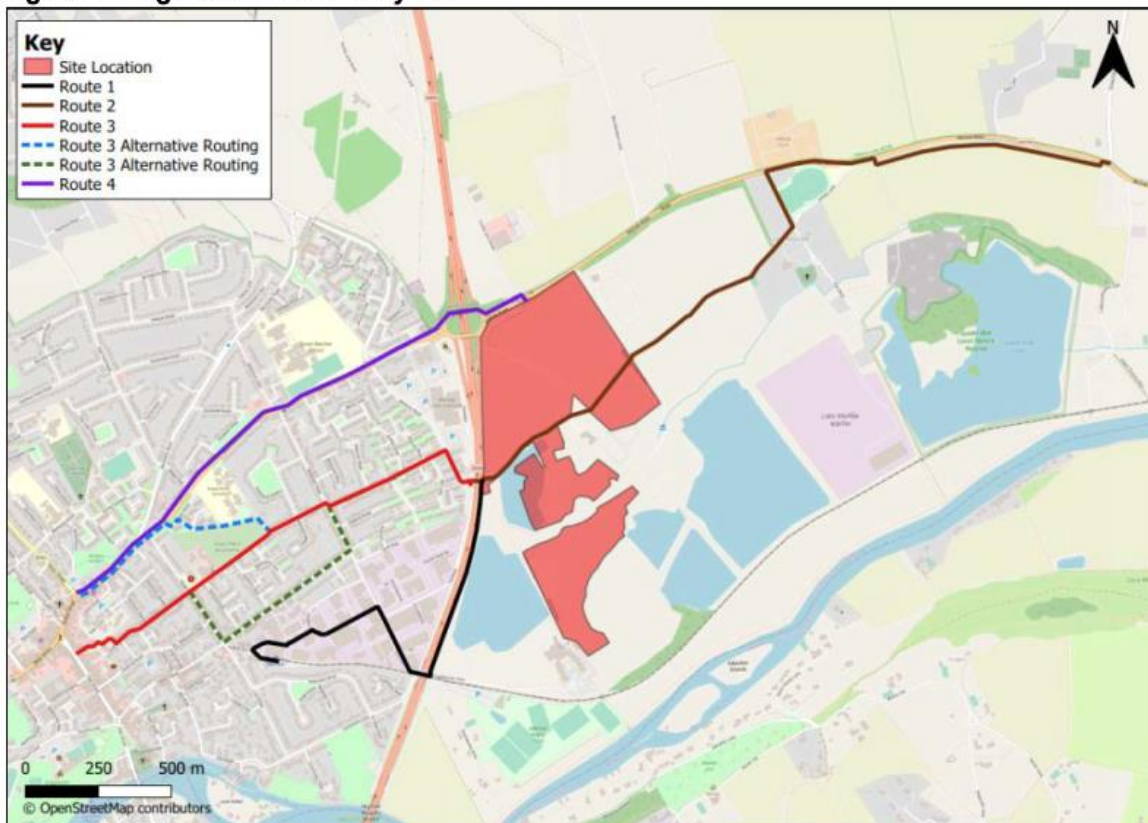
“Through the improvements that will be proposed to the west of the site cyclists will either choose to route via Fieldhouse Lane, Volvo Footbridge or via Westhorpe Interchange depending on whether the best facilities and the safest route are provided.”

However, the applicant has acknowledged that any improvements to make a connection to Fieldhouse Lane will require third party land and there is no clarity if and when this land can be secured for this connection to be made in future.

Site Visit

The WCHAR study area, as shown below, was agreed with NH and BC in a meeting dated 20th July 2023.

Figure 1.1: Agreed WCHAR Study Area



There were 4 primary routes identified to investigate existing walking and cycling conditions in order to identify the opportunities for improvements. The study routes are confirmed below;

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

The site visit was conducted on 1st August 2023 and took the form of the assessors walking along the identified pedestrian, cycle and equestrian facilities located within the agreed scoping area of visit.

Paragraph 2.24 of the WCHAR assessment summarises a number of key findings which were concluded from the site visit. These findings are as follows:

- Significant peak period cycle and pedestrian usage of the A4155 within Marlow with sufficient infrastructure to support pedestrian and cyclist movements. This provides a distributor route with connections to wider pedestrian facilities and to Marlow Town Centre.
- The experience of the assessors crossing the Westthorpe Interchange junction was that it was unpleasant and difficult to cross due to high traffic flows. Therefore,

improvements would be required to enhance the experience of pedestrians and cyclists using this junction.

- The PROW route through the site was found to be a generally pleasant route with connections to wider pedestrian facilities to the east of the site. However improvements would be required to improve the safety of the route at night for both pedestrians and cyclists. Similar observations can be made for the section of Fieldhouse Lane link adjacent to the A404.
- No evidence of horse riders using the existing network in the vicinity of the site.

Existing Pedestrian, Cyclist and Equestrian Facilities

From Marlow Station and Fieldhouse Lane to the site

Paragraph 2.26 of the WCHAR assessment provides a description of the route, which is as follows:

“Starting at Marlow station, the route heads onto Station Approach, before turning right onto Fieldhouse Way, which leads to Globe Business Park. Pedestrians then continue along Fieldhouse Way, passing Chives Café, and turn right onto Fieldhouse Lane until reaching the end of the Business Park at the T-junction. Pedestrians then turn right onto Fieldhouse Lane, continuing south underneath the A404 bridge. Upon passing beneath the bridge, an informal crossing point provides access to a car park, in which pedestrians can access a footpath which continues north to the A404 footbridge”.

This route has been identified to particularly benefit southern end users of the site, however, the applicant has already confirmed during meetings with the HA and in other documentation submitted with the application that they do not currently have control of sufficient land to provide access to and from the site to the south. While the applicant is not currently able to deliver this route as an access option to the site, for completeness and to assist with any future proposals for this route, the HA will still provide comments on the assessment findings.

The HA has reviewed the comments provided on this route and has the following concerns in relation to this route;

Pedestrian Facilities:

- Reference made to the section of Station Road measuring 42m in length, but no mention of footway width in order to determine whether it is adequate or not.
- Absence of dropped kerbs connecting Station Road to Fieldhouse Lane which can be problem for people with mobility or sight impairments.
- Reference Station Approach where pedestrians were observed utilising the space on the carriageway as a shared surface space. However, while reference is made to it being lightly trafficked during the survey period, the route appears to be subject to on-street parking associated with the dwellings and this could lead to issues to pedestrians utilising this route as a shared surface. No reference is made to the adequacy of the existing footway width. It maybe that

pedestrians were observed using the carriageway because the footways are inadequate.

- The footway on Fieldhouse Way's southern side providing a connection to Station Road measures 1.5m in width, which is below the requirement of 2m stated in Manual for Streets (MfS). However it has been argued that as per the Inclusive mobility guidelines the minimum width of 1.5m can be regarded as acceptable under most circumstances.
- There is a gap between the connectivity of footways within Globe Business Park with no provision of formal crossing points between the connections. However it has been argued that since Globe Business Park is subject to a 15mph speed limit this should be acceptable and give pedestrians ample of time to cross. With no formal crossing facility (dropped tactile crossing) it is not clear how all pedestrians, including those with mobility and sight issues, are supposed to utilise this route.
- Para 2.35 has already identified that there is no clear route for pedestrians to navigate through Globe Business Park to continue to Fieldhouse Lane which can create confusion for the users. It should be noted that the route through the Globe Business Park is private and does not form part of the adopted public highway. It is not therefore clear how the applicant would guarantee this route is available to access the site. As present it is not considered it can be relied upon to provide access to the application site.
- It has been mentioned that there is a potential to discuss the feasibility of signage in the form of finger posts with the Globe Business Park owners but there is no confirmation from the applicants that this action would be carried out as part of overall site improvements.
- It has been further identified that the pedestrians will be required to navigate car park access junctions where dropped kerbs have not been provided consistently across the approaches. However, it has been argued that this should not cause concern as the speed limits are restricted to 15mph. The HA does not agree with this approach as this is still a safety concern especially for people with mobility issues and equally for visually impaired people.
- The route through the Globe Business Park comes out onto Fieldhouse Lane. The footway width measured on Fieldhouse Lane is also 1.5m but a similar argument has been provided for it meeting the standards in the Inclusive Mobility guidance, consistent with the argument for Fieldhouse Way. However, the environment along Fieldhouse Lane is different as in this location Fieldhouse Lane provides access to a number of industrial units so is more highly trafficked than Fieldhouse Way. Requiring pedestrians to step into the carriageway of Fieldhouse Lane to pass, which may give rise to safety issues due to the restricted footway width, is far from ideal. The applicant should consider this further.
- It has been noted that the footway width reduces further underneath the A404 bridge with a pinch point of 1.42m, which will ultimately lead pedestrians to step out on carriageway. This has been recognised as a safety risk by the applicant and therefore requires addressing.

- Coming out from underneath the footbridge it has been recognised that the visibility can be an issue for both pedestrians and cyclists wanting to cross and join the latter section of the route adjacent to the A404.
- The latter section of the route is mainly rural in nature and despite being sufficient in width lacks in basic infrastructure to make it usable and safe for all users who would want to access this route. As it stands, this section of the route would require improvements. A photo is included below for reference;



Cycling Facilities

- The route for cyclists mirrors that for pedestrians.
- It is noted that no off-carriageway facilities are provided for cyclists along this route. There are no on-carriageway facilities for cyclists either that could make it a safe environment for cycling.
- As a potential improvement for cyclists it has been identified that a one-way narrowing could be introduced in the vicinity of the bridge on Fieldhouse Lane to slow the traffic and provide a segregated facility for pedestrians and cyclists.
- However it appears that this has been stated just as an option with no confirmation as to whether this improvement would be carried out or not.

In summary;

- No comments have been made in terms of the attractiveness of the route.
- No technical information has been provided for improving the footway width beneath the A404 bridge or how any one-way narrowing will be carried out to segregate vehicle route from pedestrians/cyclists.
- There is no guarantee that the third party land passing through the car park to link this route to the site can be secured.
- Part of the highlighted route passes through the Globe Business Park, which is a private development. There is no information on how it will be ensured

that the pedestrians/cyclists associated with the site can use this section of route which is a private area and does not form part of the public highway.

- It has been stated as an option that signage along the route maybe required to guide pedestrians/cyclists. However, no details have been further provided about what signage might be used and where it would be located. It is also not clear how the applicant would provide signage on the private land within the Globe Business Park.
- It is stated that the applicant is committed to upgrading the section of the route adjacent to the A404 in order that it is suitable for both pedestrian and cyclist use in line with LTN1/20, however no details of these improvements have been provided to allow the Council to Condition them as part of any permission.

Through Application Site (PROW LMA/20/1)

Paragraph 2.51 of the WCHAR assessment gives the following description of this route:

“This route begins at the A404 footbridge and continues along a public footpath in a north-eastern direction. Pedestrians / cyclists will cross Pump Lane Street near Westhorpe House before continuing along the footpath to Westhorpe Farm Lane, crossing Westhorpe Farm Lane and continuing on the PROW. Pedestrians will then reach Pound Lane, before routing northbound on Church Road, adjoining Marlow Road (A4155). Pedestrians will then continue eastbound on the A4155, before adjoining back onto client land separated from the carriageway, and finally route back onto the highway at the Marlow Road / Sheepridge Lane roundabout”.

It is to be noted that on audit has been carried out for the later section of this route as it is on land not owned by the applicant is currently inaccessible and access is not provided.

Pedestrians Facilities:

- It is stated that the route provided an excellent, pleasurable route along the entirety of its length and would likely be the first choice for pedestrians routing from locations to the east of the site during daylight hours. The statement relating to daylight hours is reflective of the more rural nature of this route, which may not be attractive to users during darker winter months.
- It is noted that the beginning of this route has uneven paving, presenting issues for those with mobility issues. This will need to be addressed by the applicant.
- The footpath comprises of variable widths ranging from 2.9m to in excess of 3.2m. However, there were sections of the route where overgrown and low hanging vegetation might require users to traverse these sections in single file and therefore can be a problem for cyclists as well as users with mobility issues. The vegetation present also provides screening of the route which may present security issues for pedestrians and cyclists using the route.
- No lighting is present on the route.

- The route lacks adequate sign postage to direct the users for the entire length of the route.
- Upon reaching Pound Lane and further north from Church Road, pedestrians will be required to walk on the carriageway which results in them having to negotiate circa 100m of carriageway on Pound Lane and 200m of carriageway on Church Road. This could pose a risk to safety for pedestrians and cyclists in darker winter months.
- It is to be noted that there are parked vehicles in certain sections on Church Road as seen in the Photo below. There is a high likelihood that this can cause a safety concern especially for the users of mobility vehicles and visually impaired people as this route provides a more direct and shorter connection to the A4155.



Cyclists

- The comments raised in relation to pedestrians are also mirrored for cyclists.
- The low hanging vegetation will pose an issue for cyclists, along with the sections of the route that are narrow due to overgrown vegetation.
- The surface of the route needs improving so that it is suitable for cyclists.
- It is noted that cyclists would need to carry their bikes over the wooden stile located at the first intersection where the footpath meets Pump Lane Street. This would rely on the cyclist being able to do this and may present an issue for those with accessible bicycles.
- It is noted that the route is currently classified as a PROW for pedestrians only, so the route would need to be reclassified if cyclists are to use it.

In summary

- It is recognised that this PROW is not currently suitable to provide a safe and suitable route to the site, and therefore will require improvements. However, no plans of these

improvements have been provided which would allow the Council to secure them as part of any permission.

- It is noted that the applicant states resurfacing of the existing path and the provision of low level lighting will deliver a secure and safe connection at all times. However the HA has concerns over the attractiveness of what is essentially a PROW, which is not overlooked and is remote from built up areas, as a main link to provide safe and suitable access to the site.
- Paragraph 2.69 of the WCHAR assessment states that the cyclists will be required to lift their bikes over a wooden stile located at the first intersection where the footpath meets Pump Lane Street, which may be an issue for those with accessible bikes. Overgrown vegetation will need to be trimmed regularly.
- It has been mentioned in paragraph 2.70 of the WCHAR assessment that the traffic flows are higher on Marlow Road, but the cyclists can use the shared footway/cycleway provided. However, no details about the width of this shared footway/cycleway has been provided. Looking at google earth, it does not appear that the width is sufficient to be used as a shared footway/cycleway.
- The applicants have stated in paragraph 2.72 of the WCHAR assessment that *“It is proposed to provide a new pedestrian and cycle route to the east of the site from Little Marlow to the western edge of Bourne End. This will be a segregated pedestrian/cycle route in line with LTN1/20 to be provided across the field to the south of the A4155 Marlow Road. The exact design of this route is to be agreed with Buckinghamshire Council as the local planning and highway authority.”*
- However there is no clarity on whether this proposal will definitely be carried out or not.

A404 Footbridge to Town Centre

Paragraph 2.73 of the WCHAR assessment gives the following description of this route:

“This route starts with pedestrians traversing the A404 footbridge from the site, before exiting onto The Chase and Wiltshire Road. Pedestrians / cyclists, then continue north on Wiltshire Road, before taking a left turning onto Gunthorpe Road. Continuing west on Gunthorpe Road, pedestrians / cyclists then access Westhorpe Road via a dedicated pedestrian and cyclist cut-through, continuing until reaching the T-junction with Newton Road.

Following this, pedestrians and cyclists route for approximately 20m north, before routing west onto Newfield Road. Upon reaching the western extent of Newfield Road, pedestrians will utilise the passage adjacent to the allotments, continuing until the path merges onto Victoria Road. Continuing, pedestrians will travel along Claremont Road and subsequently Cromwell Gardens, from which a right turning will take them to a network of small footways that lead to a public realm and ultimately the town centre”.

It should be noted that while the above route description refers to both pedestrians and cyclists, the Volvo Footbridge does not currently cater for cyclists. Therefore any cyclists

using this route would be required to push their bike up and down stairs and relies on them being physically able to do this. The route is therefore not attractive or convenient for cyclists.

Pedestrian Facilities

- The width of the Volvo Footbridge is 1.8m but the bridge has no ramps and therefore will be an issue for wheelchair users which has been identified as a concern in the audit.
- No footways are present on Wiltshire Road on either side of the carriageways and therefore pedestrians will be required to walk on the carriageway for this section of the route as seen in the photo below. This can cause serious safety concerns for the users with mobility issues especially with parked cars on both sides of the carriageway which will further narrow down the usable width of the carriageway.



- Footways on Gunthorpe Road have been measured as 1.65m and it has been argued that although they do not meet the required standards of 1.8m-2m, the current width should be acceptable due to the residential nature of the street.
- The section of the route passing through Westhorpe Road has also been identified to not benefit from footway provision. However, it has been argued that due to the street being residential in nature and relatively low traffic this should be acceptable. It is questionable whether this would be consistent with a safe and suitable route for pedestrians and no further information is included to demonstrate that it is.
- The footpath adjacent to Foxes Piece Allotments also varies in width and has been measured as 1.30m at its narrowest point, thereby creating concerns for the users with mobility issues and may require extra space on footpath. It has also previously been highlighted that this route is not well overlooked due to the high hedge along one side, which could result in security issues for users.
- The footway widths on Cromwell Gardens have also been measured at approximately 1.18m wide and are therefore substandard. However the same argument has been

provided that due to the street being residential in nature and lightly trafficked, the substandard width should not be regarded as major safety issue. As with Westhorpe Road, further information has not been included to demonstrate that this is a safe and suitable route.

Cycling Facilities

- The width of bridge at 1.8m is insufficient for cyclists as the minimum width requirement is 2m.
- It has also been acknowledged that the bridge parapets might not be sufficient for cyclists as well as the lack of a ramp which will make it difficult for cyclists to access the bridge as they will be required to dismount their bikes and carry it across the bridge.
- Two alternative routes have been proposed for cyclists; one route is via Newton Road, Dedmere Road and Glade Road and the second route is via joining the northern side of the Foxes Piece allotment after turning right at the end of Newton Road and subsequently joining Little Marlow Road.
- Footway widths on Newton Road have been measured as 1.5m while the northern end of Dedmere Road has been measured as 1.8m wide. No further measurements of footway widths have been provided for the remaining section of the route.
- For the section of the route passing through Station Road it has been mentioned in paragraph 2.120 of the WCHAR assessment that the effective width of the carriageway decreases due to the parked cars outside the properties and cyclists might also be required to navigate through parked cars further on Glade Road.

In Summary

- Along with the already identified issues of lack of footways on Wiltshire Road and Westhorpe Road and insufficient widths on a couple of sections of road, it has also been acknowledged that a couple of the junctions are missing tactile paving and that it needs to be provided.
- It has also been mentioned in the audit that the road on this route can benefit from maintenance via some resurfacing in places due to the presence of potholes.
- No plans have been provided to confirm any of the improvements suggested in the audit.
- The section of route that comprises of a footway that passes adjacent to Foxes Piece allotment has insufficient width in certain sections and does not appear to be attractive or safe, especially when being used in dark winter months.
- No detailed assessment has been carried out to judge the attractiveness of the alternative route for cyclists other than stating that the auditors felt that the routes are safe due to the residential nature and light traffic on the streets.

Westhorpe Interchange and Marlow Road to Town Centre

Paragraph 2.129 provides a description of the route, which is as follows:

“This route provides a connection from Marlow town centre, routing eastbound via Chapel Street and subsequently onto Little Marlow Road (A4155) eastbound. Pedestrians and cyclists will then continue eastbound before crossing the A404 via Westhorpe Interchange, in order to reach the main site access.”

Pedestrian Facilities

- It is noted that the footway provision and environment in Marlow town centre is suitable to accommodate pedestrians associated with the proposed development.
- The town centre route benefits from street lighting at semi regular intervals which is beneficial during darker winter months.
- A zebra crossing is provided in the town centre with a refuge island and dropped tactile crossings.
- It is noted that as you travel to the north east on the A4155 the footway narrows where it passes Lidl and the assessment states that while pedestrians can walk side by side, it may be difficult for a pedestrian and wheelchair to pass each other comfortably, possibly resulting in a pedestrian having to walk on the carriageway to pass. The width of this section of footway is not given in the assessment.
- The assessment notes that dropped kerbs are provided on the approach to junctions, however it also noted that there were crossings over junctions that did not benefit from tactile paving.
- There are bus stops along the A4155 route that pedestrians wanting to access the site can utilise.
- The assessment highlights the pedestrian crossing located approximately 70m north of the Chapel Street bus stop, which gives pedestrians the opportunity to cross to utilise the footway on the opposite side of the A4155 if required. At this point the shared footway/cycleway also begins adjacent to the south eastern side of the carriageway.
- As pedestrians travel to the north east they need to cross the side road junction at Cedar Court, which the assessment states benefits from a tactile dropped crossing and colour surfacing on the carriageway. The assessment does not however comment on the condition of the coloured surfacing and whether it is still in a condition where it can be effective.
- The assessment notes that beyond this junction the footway widens to 2.45m and then onto 3m as it heads to the north east.
- The assessment has highlighted the dropped tactile crossing across the side road junction with Glade Road, which is shown to benefit from coloured surface across the crossing.
- The crossing point across Foxes Piece is also stated to benefit from the same crossing arrangements as the other two side road junctions, however the assessment makes the comment that both features across Foxes Piece would benefit from maintenance through repainting.
- There is a further crossing facility as the route continues to the north east. At this point the shared footway / cycleway facility changes to the north west side of the carriageway and the assessment notes that there is directional signage on the surface of the route for cyclists that is currently faded and would benefit from maintenance in the form of repainting.

- Further to the north east there is a bus stop on the western side of the carriageway and at this point the shared footway/cycleway separates with the cycleway travelling behind the bus stop.
- Adjacent to the Great Marlow School, located further to the north east, there is a zebra crossing to allow pedestrians to utilise the footway on the opposite side of the carriageway if required. The assessment suggests that this crossing would benefit from maintenance in the form of repainting. It also states that consideration could be given to changing this crossing to a signalised crossing to provide a better facility for pedestrians and cyclists and also to potentially assist with the flow of traffic along the A4155 during peak times.
- The section of footway/cycleway adjacent to the school boundary where there is a strip of vegetation between the footway/cycleway and the carriageway. It is noted that regular street lighting is provided along this section of the route.
- To the north east of the school the route reaches the Wiltshire Road roundabout where dropped tactile crossings are provided for pedestrians and cyclists crossing the roundabout.
- The footway/cycleway facility continues along the north western side of the carriageway with a dropped tactile crossing and coloured surfacing across the Woodside Gardens sideroad junction.
- Further to the north east the route eventually reaches the Westhorpe Roundabout junction. The assessment notes that this section of the route that traverses the Westhorpe Interchange is unfavourable due to the highway traffic flows experienced not allowing much time to allow pedestrians and cyclists to cross the on/off-slips of the A404. This poses an additional issue for pedestrians with reduced mobility.
- The footway across the bridge is stated to measure approximately 2.2m and while this meets the required widths for pedestrians, it is not sufficient for cyclist use. The height of the parapet railings is also not suitable for cyclists.
- The assessment does not make comment on whether there is any buffer between the footway provision across the roundabout and the main circulatory carriageway.
- Once over the interchange, pedestrians would then continue along the A4155 where the footway measures 2m in width.

Cycling Facilities

- Many of the facilities for cyclists have been mentioned in the above text concerning pedestrian routes.
- The route from Marlow town centre along the A4155 does benefit from a shared footway/cycleway facility along much of its length.
- The assessment mentions the side road crossings that it has already identified as requiring maintenance in the form of repainting to increase cyclist awareness and awareness to drivers.
- The assessment mainly highlights the “likely unpleasant” environment across the Westhorpe Interchange where cyclists would compromise their safety navigating the junction due to high traffic flows (which will increase as a result of the development) and uncontrolled crossing points.
- The footway and parapet across the bridge are also inadequate to provide a safe and suitable route for cyclists.

In Summary

- The route between the town centre and the Westhorpe roundabout is generally appropriate for pedestrians and cyclists noting that we are looking at an existing network with existing constraints.
- The HA has previously highlighted possible improvements along this route which could include the upgrading of the side road junction crossings to provide LTN1/20 compliant crossing points.
- It is evident that there are significant safety issues relating to the movement of pedestrians and cyclists across the Westhorpe Interchange and if the applicant is to achieve their ambitious mode share targets, this route will need to be significantly improved to provide a safe, suitable and attractive route to and from the site.
- Any improvements across the Westhorpe Interchange, in terms of signalised crossing facilities and changes to footway widths are likely to have an impact on the operation of the junction which needs to be fully taken into account.
- It is also noted that this is a junction that falls under the control of National Highways so they will have the final say on the acceptability of any improvements proposed.

User Opportunities

Section 3 of the WCHAR assessment looks at User Opportunities which the applicant considers to be relevant to the proposed scheme and it states they should be considered by the wider design team throughout the progression of the development. The extract below includes the pedestrian specific user opportunities that have been identified.

Pedestrian Specific

- Opportunity 1: Seek agreement for signposting within the vicinity of Globe Business Park to improve routing for pedestrians for the Marlow Station via Fieldhouse Lane route.
- Opportunity 2: Improvement to the Marlow Station via Fieldhouse Lane route through the widening of the footway beneath the A404 bridge, to improve safety for pedestrians.
- Opportunity 3: Improvement to the Fieldhouse Lane track adjacent to the A404 through the resurfacing of the track and provision of lighting to improve pedestrian access and safety.
- Opportunity 4: Improvement of the existing PRow Footpath LMA/20/1, to enhance the footpath by increasing the width of the path to improve access for pedestrians from all walks of life, resurfacing the existing path to improve mobility, and provision of low level lighting.
- Opportunity 5: Improvement to the route to the east of the site by providing a connection to Bourne End, through the provision of a segregated footpath/cycleway through land in the control of the client which would be separated from the Marlow Road (A4155) from School Lane, Little Marlow to the Marlow Road (A4155) / Sheepridge Lane roundabout.
- Opportunity 6: Improvement to the pedestrian zebra crossing on Marlow Road (A4155) adjacent to Bobmore Lane through the signalisation of the crossing to cater for pedestrians and cyclists.
- Opportunity 7: Improvement through signalised pedestrian crossings at the Westhorpe Interchange for both the A404 On and Off Slips, on the northern arm of the junction.
- Opportunity 8: Seeking to improve the Marlow Road (A4155) northern footway from Westhorpe Interchange to the Site Access through widening where possible in public highway land.
- Opportunity 9: Ensuring tactile paving is proposed as appropriate at all road crossings.

It is noted that there is no opportunity identified to improve the crossings on the side road junctions on the A4155 route to be consistent with the requirements set out in LTN1/20. It is also difficult to determine whether all opportunities have been identified as the assessment lacks detail of widths of footway provision in places, so possible requirements to widen sections of footway may have been missed.

The extract below contains the cyclist specific user opportunities that have been identified.

Cyclist Specific

- Opportunity 1: Potential improvement to the Marlow Station via Fieldhouse Lane route to improve visibility for cyclists through one way narrowing beneath the A404 bridge.
- Opportunity 2: Potential improvement to the Fieldhouse Lane track adjacent to the A404 through the resurfacing of the track and provision of lighting to improve cyclist access and safety.
- Opportunity 3: Improvement of the existing PRow Footpath LMA/20/1, to enhance the footpath by increasing the width of the path to allow cyclists access, resurfacing the existing path to improve the route for cyclists and provision of lighting.
- Opportunity 4: Potential improvement to the Volvo Footbridge through the implementation of ramps to allow for cyclist access and the increase of the parapet height on the bridge to 1.4m, improving cyclist safety.
- Opportunity 5: Improvement to the bridge parapet height to 1.4m to allow for improved cyclist safety across Westhorpe Interchange.
- Opportunity 6: Improvement to the route to the east of the site by providing a connection to Bourne End, through the provision of a segregated footpath/cycleway through land in the control of the client which would be separated from the Marlow Road (A4155) from School Lane, Little Marlow to the Marlow Road (A4155) / Sheepridge Lane roundabout.

As with the identified pedestrian opportunities, there is no mention of improvements to the side road junction crossings to make them LTN1/20 compliant. Also consistent with the pedestrian opportunities, it is difficult to determine whether all opportunities have been identified. For instance, in places where it is proposed that cyclists use on-carriageways routes instead of off-carriageway routes, would there be anything that could be done to better alert drivers to the presence of cyclists on the carriageway.

The WCHAR assessment also includes the two plans showing the changes proposed to the Westhorpe Interchange. It should again be noted that these changes will need to be considered by National Highways who will confirm whether or not they are acceptable in terms of safety, capacity impacts on the operation of the junction and also DMRB requirements. At this stage the improvements have not been confirmed as acceptable and deliverable.

Proposed Improvements

Following the work carried out to date and the information contained within the WCHAR assessment, the applicant has prepared a summary of the walking and cycling improvements that are intended to be associated with the proposed development. These improvements are detailed in paragraph 2.21 of the STA and are as follows:

Onsite

- The retention and enhancement of the existing PROWs that cross the site through improved surfacing and lighting.
- The provision of new routes to allow pedestrians and cyclists to move around the site.

Site Access

- The provision of a roundabout on Marlow Road (A4155) retaining access for residents of Westhorpe House, Westhorpe Park Homes, and provide access to Pump Lane South including the provision of a signal-controlled crossing on the eastern arm of the new roundabout (A4155 Marlow Road) and uncontrolled pedestrian and cycle crossings on the remaining arms (Pump Lane South and the site access).

It should be noted that following the HA's review of the traffic modelling of the site access, it is yet to be convinced that the proposed roundabout provides an appropriate access arrangement for the proposed development.

Connections to the East

- The provision of a new connection to Bourne End, through the provision of a segregated footpath/cycleway through land in control of the applicant which would be separated from the Marlow Road (A4155) from School Lane, Little Marlow to the Marlow Road (A4155) / Sheepridge Lane Lane roundabout.

Connections to the West

- Partial Signal Control at Westhorpe Interchange (A404 Northbound On and Southbound Off Slip and the A4155 westbound approach)
 - Signal controlled crossing of the A404 northbound onslip;
 - Signal controlled crossing of the A404 southbound offslip;
 - Widening of the pedestrian/cycle route across the junction to 3m with a 300m buffer strip;
 - Increasing the height of the bridge parapet to 1.5m;
 - Provision of improvements to the existing pedestrian and cycle route between the site and Westhorpe Interchange.

As stated in the comments relating to the WCHAR assessment, the proposed alterations to the Westhorpe Interchange will be subject to assessment by National Highways in terms of safety, capacity and compliance with the Design Manual for Roads and Bridge. Initial discussions with National Highways has highlighted that they have not yet finalised their assessment of the junction changes and are not therefore in a position to determine the acceptability or deliverability of the proposed changes.

While National Highways are not able to confirm that the proposed changes to the Westhorpe Interchange are acceptable, it brings into doubt the applicants ability to deliver a safe and suitable walking and cycling route between the site and Marlow via the Westhorpe Interchange. Without the link across the Westhorpe Interchange the HA considers that the

site would not be well connected in terms of sustainable forms of transport and therefore unlikely to achieve the mode share targets that are contained within their STS.

There is no mention in the improvements listed above or any improvements off site within Marlow to further aid the safe and convenient movement of pedestrians and cyclists and to encourage walking and cycling as a form of transport to and from the site. For a development of this scale, and one with mode share targets that push towards the use of sustainable forms of traffic to a higher level than would normally be expected, the HA would expect further off-site improvements to aid walking and cycling.

It is also evident from the improvements listed above that the applicant is proposing the connection across the Westhorpe Interchange as the only improvement to walking and cycling connections to the west into Marlow. The HA considers that in order to achieve a site that is well connected to the local area by walking and cycling the applicant should be providing a number of route choices to make accessing different areas within Marlow as convenient as possible. At present the only cycle link is proposed to be via the main site access to the north of the site if indeed that is deliverable. If someone wanted to cycle from the southern end of the site to a location towards the southern end of Marlow, the route they would be required to take would be through the site to the north then out the site, across the Westhorpe Interchange, and back down through Marlow to the south. The distance of such a route and the time taken to travel it would be greatly reduced if a further access option for cyclists was provided for toward the centre (or south) of the site. However, based on the information provided at this stage, the applicant is not proposing to deliver such an access option.

Paragraph 2.22 of the STA states that in addition to the improvements that the applicant has listed, there are a number of ways in which the footbridge could be improved to cater for pedestrians and cyclists, which would range from replacing the existing steps and ramps to make them DDA compliant.

Paragraph 2.23 states the following in relation to any improvements that may be required to the Volvo footbridge:

“If the monitoring to be undertaken as part of the MSIS shows that additional improvements are needed to achieve the specific targets for pedestrians and cyclists to/from the Site, the approaches to the Volvo Footbridge will be improved to provide DDA compliant ramps and stairs. This will both improve this route for pedestrians and make it available for cyclists. The mechanism for this monitoring will be set out in the S106 Agreement associated with the proposed development.”

It is therefore evident that improvements to the Volvo footbridge are not to be implemented from the outset and would only be provided at a later stage should the monitoring proposed by the applicant show that improvements are necessary. The HA does not agree with the principle of this approach. Improvements to provide a choice of safe, suitable and attractive walking and cycling routes to the site should be in place before the site is occupied in order that they can help influence people's travel choice from the outset. This would give the best chance of convincing people to walk or cycle rather than use a private car. Not providing

adequate links from the outset and then waiting for mode share targets not to be met before making improvements may mean that it is too late to then influence people to change their travel choice and in turn be too late to address any issues that may have arisen from the mode share targets not being met. It has also not been successfully demonstrated at this stage that any such improvements to the Volvo footbridge are acceptable to National Highways and deliverable on the available land.

In relation to the potential for a link to the south of the site to Fieldhouse Lane, paragraph 2.26 of the STA states the following:

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

Paragraph 2.27 of the STA then goes onto state:

“There is a reasonable chance that a link to Fieldhouse Lane will be achieved in the near future for pedestrians and cyclists.”

It is evident from paragraph 2.26 that a link to Fieldhouse Lane cannot be achieved and is not going to be delivered as part of this planning application. A link to Fieldhouse Lane cannot there be taken into account by the HA as something that will contribute to the connectivity of the site to surrounding walking and cycling facilities.

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

The HA has previously advised the applicant that in order for any improvements to be considered and secured as part of the planning application, details would be required to demonstrate what improvements are being proposed and where they are going to be implemented. At present the improvements proposed by the applicant are uncertain in terms of details, therefore it is difficult for the HA to make a judgement on their likely effectiveness. The HA has also previously advised the applicant on the need for side road junction crossings to be LTN1/20 compliant, however the applicant is only referring to tactile crossings being provided, which is not sufficient. Finally, the applicant has previously been advised that once any improvement works have been identified and secured, they will need to be delivered by the applicant as part of an off-site highway works package, however the applicant is only

referring to making contributions for the Council to deliver the works, which is not acceptable to the Council.

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

Notwithstanding the comments relating to the choice and suitability of routes, there is also uncertainty as to whether the route for pedestrians and cyclists across the Westhorpe junction will be acceptable to National Highways and therefore at present the HA is not in a position to confirm the acceptability of this route.

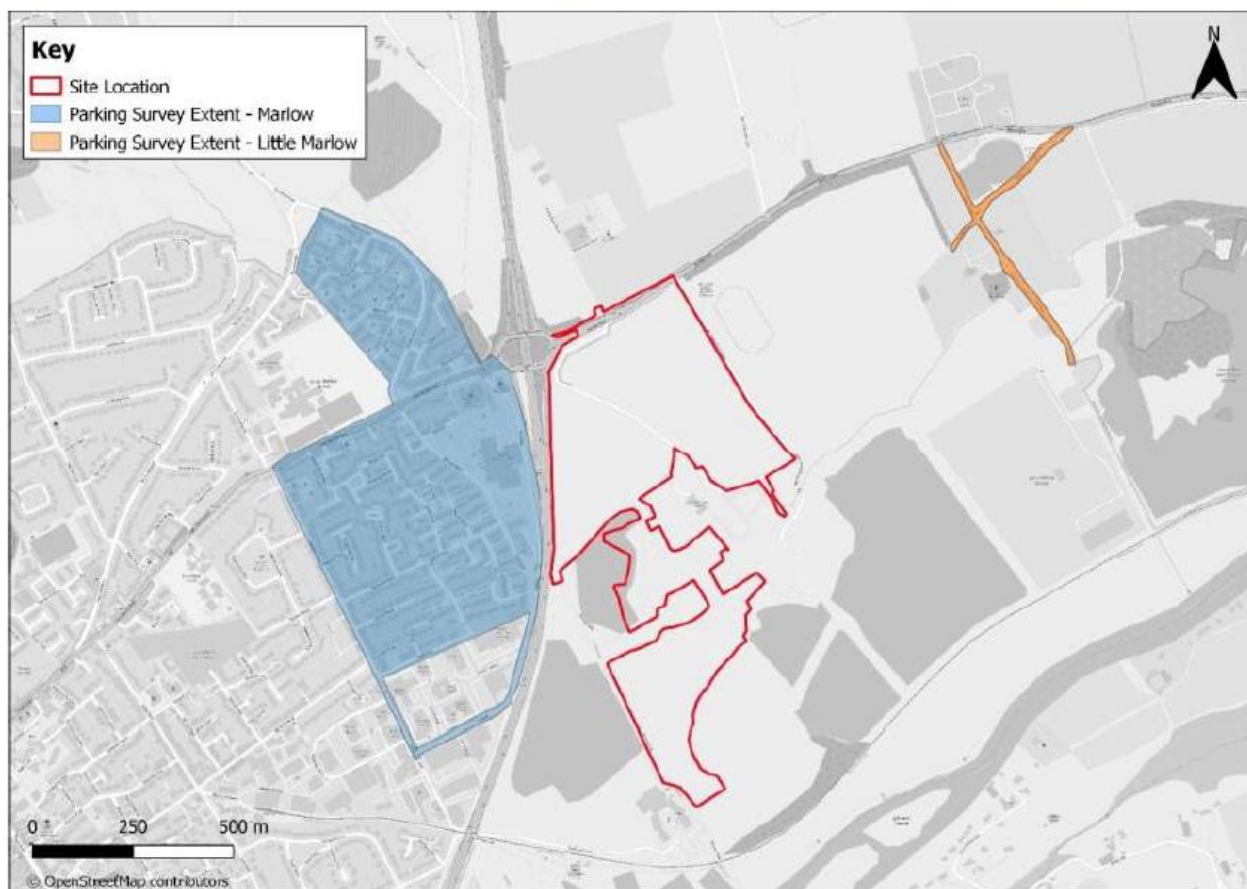
Car Parking

The HA's previous comments relating to TAA2 noted the proposed parking management within the site and the HA considers that parking management within the site forms a significant part of the strategy to reduce the number of car movements to it. The HA is however also aware that if the parking management proposals within the site are to be successful in reducing car trips to the site, then there also needs to be a mechanism by which any off-site overspill parking can be managed and restricted. This is to stop people who drive to the site and are turned away, as they are not entitled to park on site, parking within Marlow to the west and Little Marlow to the east, resulting in additional pressure on the local highway network.

The applicant has previously stated that in the event that parking restrictions are required offsite to deal with any issues resulting from the parking of vehicles associated with the film studio, a contribution will be made to enable the introduction of parking restrictions. The HA's concern was that the applicant had not given any details as to how any issues associated with off-site parking, and the extent of any parking restrictions would need to cover, would be identified.

The STA confirms in paragraph 2.34 that as part of the Mode Share Incentive Scheme (MSIS) it is proposed to monitor whether there is any increase in on-street parking on the roads around the film studio site as a result of the development. In order to do this the STA includes an area that the applicant has identified where they consider there could be a potential for on-street parking to occur. The area covers roads in Little Marlow to the east of the site and Marlow to the west of the site which are within a reasonable walking distance of the site, which the applicant has identified as a 10 minute walking distance. The identified area is shown in Figure 1 on page 18 of the STA and is included below for confirmation.

Figure 1: Marlow and Little Marlow Walking Isochrones – Offsite Parking Monitoring



It is proposed that the streets identified in the highlighted area would be subject to an on-street parking survey on a neutral weekday (Tuesday, Wednesday and Thursday) between 1400 and 1600 to establish the baseline position of on-street parking. It is then proposed that annual surveys of the same streets at the same times would be undertaken in order to identify whether on-street parking conditions have changed. If there is an identified change in conditions then further surveys would be needed in the identified areas to determine whether the changes relate to the site. It is suggested that this could be done through surveys of pedestrians arriving at the site on foot and through observations.

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

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

the measures are acceptable. It is noted that while the Volvo footbridge is being proposed as an access route to the site for pedestrians it does not appear that the survey area covers a 10 minute walk from where the footbridge crosses the A404. The scope of the survey will therefore need to be increased to cover that area. It is also noted that the applicant may look to provide the link to the south of the site to Fieldhouse Lane in the future and if this did occur then the detail of the strategy would need to allow the impacts of that link on on-street parking to also be monitored and managed if required.

Monitor and Manage

The Monitor and Manage approach has been set out in previous documentation provided by the applicant, however for confirmation I will set out the main aims below:

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

The full details of the Monitor and Manage Strategy will need to be set out and agreed in the S106 Agreement that is secured as part of any planning permission that may be granted. At present the full details of the Monitor and Manage Strategy and how it would work have not been submitted by the applicant and therefore the HA is not in a position to confirm that the measures included in it would be adequate to deal with any issues arising from the proposed development. It should also be noted that the applicant will need to full fund any TRO and parking restrictions that may be required in order to address the impact of an identified on-street parking issues associated with the development.

Baseline and Future Network Traffic Flows

Baseline Data

Paragraph 3.2 of the STA confirms that the applicant has carried out a number of new traffic surveys comprising Manual Classified Count (MCC) surveys and queue length surveys to obtain current baseline data to inform the assessments on the wider highway network. To confirm, the additional surveys were carried out at the following locations.

- A4155 Little Marlow Road j/w Bobmore Lane and Newtown Road (Staggered Crossroad junction)
- A4155 Little Marlow Road j/w Glade Road (Priority T-junction)
- A4155 Little Marlow Road j/w Wycombe Road (Priority T-junction)
- A4155 Chapel Street j/w Dean Street and Marlow Road (Three-arm mini roundabout)
- A4155 Marlow Road j/w High Street and West Street (Three-arm mini roundabout)
- A4155 Marlow Road j/w Sheepridge Lane (Three-arm mini roundabout)
- A4155 Marlow Road j/w Blind Lane (Priority T-junction)
- A4155 The Parade j/w Cores End Road and Station Road (Three-arm mini roundabout)

Future Year Traffic Data

The STA confirms that the future year traffic growth has been obtained using TEMPro growth factors that have previously been agreed with the HA. It also confirms that the development flows used to inform the assessments contained with the STA are the flows that have also been previously agreed with the HA.

Junction Impact and VISSIM Model Assessment

VISSIM Model Assessment

As mentioned in my previous consultation responses, the VISSIM modelling that the applicant has carried out has been reviewed by Atkins on behalf of the Council to ensure that the model has been built correctly, it validates well and the driver behaviour reflects real life conditions on the network. Following a number of reviews and a number of updates by the applicant, Atkins have confirmed that they are satisfied with these elements of the modelling, therefore the applicant has moved to use that approved model to carry out the scenario testing of the development traffic impact on the modelling area.

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

The following comments therefore consider the VISSIM modelling contained within the BN rather than Section 4 of the STA.

Paragraph 2.8 of the BN confirms that the calibrated and validated base model has been used to test agreed scenarios comprising:

- Do Nothing (DN or 'Reference Case') – base traffic factored up to future years 2027 and 2034 using TEMPRO;

- Do Something (DS or 'Proposed Development') – as above, but with the inclusion of the Managed (STS) development traffic, the proposed Marlow Road/Site Access roundabout, including a controlled signalised pedestrian crossing on the eastern arm (DS5), and proposed mitigation at Westhorpe Interchange comprising part-signalisation and including signalised pedestrian crossings on the northern slip roads.

Paragraph 2.10 of the BN states the following:

“2.10 As previously reported a ‘Sensitivity Test’ has also been undertaken for the DS scenario which contains ‘Unmanaged’ development flows. As previously set out, given the nature and provisions of the Proposed Development, and the direct level of control inherent in the operation of the Film industry, it is not considered that an unmanaged scenario will arise.”

However, the HA has always considered the mode share targets put forward by the applicant to be ambitious and unrealistic. It is also not possible to guarantee that the mode share targets will be met, therefore the HA has always insisted that the unmanaged scenario needs to be tested as the HA needs to be sure that any impact arising from that scenario can be adequately mitigated.

The BN goes on to confirm at paragraph 2.12 that two variations of the Do Something scenarios have been tested. These are as follows:

- Option 1 – which includes a two-lane approach on Little Marlow Road between the Parkway Roundabout and Westhorpe Interchange; and
- Option 2 – as above, but with a three-lane approach.

The BN states in paragraph 2.13 that the results presented for Managed (STS) development traffic are reporting the impact for both the Do Something Options 1 & 2, whereas the 'Unmanaged' development flows are reported for the Do Something Option 2 only.

MOVA Operation

The applicant has stated that feedback and commentary from the independent reviews of the VISSIM model identified that the impact of Microprocessor Optimised Actuation (MOVA) should be investigated to better balance queues around the junction and one the A404 slip roads. The model has therefore been set up to allow fixed-time plan changes which respond to changing flows within the model, which will reflect the effect of MOVA operation.

The HA has now taken the opportunity to review the VISSIM modelling results and can confirm the following observations in relation to the performance of the modelled network.

A4155 Little Marlow Road/Wiltshire Road Roundabout

Wiltshire Road North Arm

2027

In the AM peak, the 2027 baseline average maximum queue on the Wiltshire Road north approach to the junction is 94 metres long, increasing by 32 metres to 126 metres in the Managed Option 1 scenario and to 119 metres, an increase of 25 metres, or a 27% increase, in the Managed Option 2 scenario.

For the Unmanaged Option 2 scenario the queue increases by 39 metres to 133 metres. There are continuous queues on this approach throughout the AM peak hour.

In the evening peak, the 2027 baseline average maximum queue on the Wiltshire Road north approach to the junction is 46 metres long, remaining at 46 metres in the Managed Option 1 scenario and increasing slightly to 47 metres in the Managed Option 2 scenario and the Unmanaged Option 2 scenario. There are small continuous queues on this approach throughout the PM peak hour.

2034

For 2034 in the AM peak, the baseline average maximum queue on the Wiltshire Road north approach to the junction is 101 metres long, increasing by 58 metres to 159 metres in the Managed Option 1 scenario and by 33 metres to 134 metres, a 33% increase, in the Managed Option 2 scenario.

For the Unmanaged Option 2 scenario the queue increases by 74 metres to 175 metres, a 73% increase. There are continuous queues on this approach throughout the AM peak hour.

For 2034 in the PM peak, the baseline average maximum queue on the Wiltshire Road north approach to the junction is 49 metres long, increasing to 53 metres in the Managed Option 1 scenario and reducing to 45 metres in the Managed Option 2 scenario.

For the Unmanaged Option 2 scenario the queue reduces to 48 metres, a reduction of 1 metre when compared to the 2034 DN scenario. There are small continuous queues on this approach throughout the PM peak hour.

It can be concluded that there will be a significant increase in queueing in the AM peak hour on this arm due to development traffic, even with the Option 2 scenario. The AM peak hour impact on this arm of the junction is therefore not acceptable to the HA. The impact in the PM period in terms of queueing is shown to be minimal.

Little Marlow Road East arm

2027

In the AM peak, the 2027 baseline average maximum queue on the Little Marlow Road East approach to the junction is 171 metres long, increasing slightly to 172 metres in the Managed Option 1 and the Managed Option 2 scenarios.

In the Unmanaged Option 2 scenario the queue increases to 173 metres. There are continuous queues on this approach throughout the AM peak hour with a peak between 0810 and 0830.

In the evening peak, the 2027 baseline average maximum queue on the Little Marlow Road East approach to the junction is 141 metres long, increasing to 159 metres in the Managed Option 1 scenario and increasing to 164 metres in the Managed Option 2 scenario.

In the Unmanaged Option 2 scenario the queue increases by 22 metres to 163 metres, a 16% increase, in the Unmanaged Option 2 scenario. There are continuous queues on this approach throughout the PM peak hour.

2034

For 2034 in the AM peak, the baseline average maximum queue on the Little Marlow Road East approach to the junction is 171 metres long, increasing to 172 metres in the Managed Option 1 scenario and remaining at 171 metres in the Managed Option 2 scenario.

For the Unmanaged Option 2 scenario the queue increases to 172 metres. There are continuous queues on this approach throughout the AM peak hour with a peak between 0810 and 0830.

For 2034 in the PM peak, the baseline average maximum queue on the Little Marlow Road East approach to the junction is 143 metres long, increasing by 24 metres to 167 metres in the Managed Option 1 scenario and to 168 metres in the Managed Option 2 scenario.

For the Unmanaged Option 2 scenario the queue also increases to 167 metres. There are continuous queues on this approach throughout the PM peak hour.

It can be concluded that the development traffic and the proposed improvements have a minimal effect on this arm of the junction in the AM peak hour, but there is already significant queueing in the DM scenario. The development traffic impact in the PM peak hour is shown to be greater with increases in queueing of over 20 metres, however this equates to around 4 Passenger Car Units (PCU's) and is not considered to be material.

Wiltshire Road South

2027

In the AM peak, the 2027 baseline average maximum queue on the Wiltshire Road south approach to the junction is 68 metres long, increasing to 78 metres in the Managed Option 1 and the Managed Option 2 scenarios.

For the Unmanaged Option 2 scenario the queue increases by 13 metres to 81 metres, which equates to around a 2 PCU increase. There are continuous queues on this approach throughout the AM peak hour with a peak between 0815 and 0830.

In the evening peak, the 2027 baseline average maximum queue on the Wiltshire Road south approach to the junction is 15 metres long, remaining at 15 metres in the Managed Option 1 and increasing to 16 metres in the Managed Option 2 scenario, increasing to 17 metres in the Unmanaged Option 2 scenario. There is very little queuing on this approach during the PM peak hour.

2034

For 2034 in the AM peak, the baseline average maximum queue on the Wiltshire Road south approach to the junction is 94 metres long, increasing by 11 metres to 105 metres in the Managed Option 1 scenario and to 107 metres in the Managed Option 2 scenario.

For the Unmanaged Option 2 scenario the spreadsheet attached to the STA shows that the queue increases to 97 metres. There are continuous queues on this approach throughout the AM peak hour with a peak between 0810 and 0830.

For 2034 in the PM peak, the baseline average maximum queue on the Wiltshire Road north approach to the junction is 16 metres long, remaining at 16 metres long in the Managed Option 1 and the Managed Option 2 scenarios. For the Unmanaged Option 2 scenario the queue increases to 17 metres. There is very little queuing on this approach during the evening peak hour.

It can be concluded that the development traffic and the proposed improvements have a minimal effect on this arm and there is little queuing on this arm.

Little Marlow Road West

2027

In the AM peak, the 2027 baseline average maximum queue on the Little Marlow Road West approach to the junction is 141 metres long, increasing by 122 metres to 263 metres, an 87% or 21 PCU increase, in the Managed Option ,1 and by 117 metres, an 83% or 20 PCU increase, to 258 metres in the Managed Option 2 scenario.

For the Unmanaged Option 2 scenario the queue increases by 139 metres, or 24 PCU's, to 280 metres thereby doubling the queue length. There are continuous queues on this approach throughout the AM peak hour.

In the evening peak, the 2027 baseline average maximum queue on the Little Marlow Road West approach to the junction is 156 metres long, increasing by 33 metres, or 6 PCU's, to 189 metres, a 21% increase in the Managed Option 1 scenario and by 31 metres, or 5 PCU's, to 187 metres in the Managed Option 2 scenario.

For the Unmanaged Option 2 scenario it increases by 89 metres, or 15 PCU's, to 245 metres, a 57% increase. There are continuous queues on this approach throughout the PM peak hour.

2034

For 2034 in the AM peak, the baseline average maximum queue on the Little Marlow Road West approach to the junction is 169 metres long, increasing by 137 metres, or 24 PCU's, to 306 metres, an 81% increase, in the Managed Option 1 scenario and by 125 metres, or 22 PCU's, to 294 metres, a 74% increase, in the Managed Option 2 scenario.

For the Unmanaged Option 2 scenario the queue increases by 143 metres, or 25 PCU's, to 312 metres, an increase of 85%. There are continuous queues on this approach throughout the AM peak hour.

For 2034 in the PM peak, the baseline average maximum queue on the Little Marlow Road West approach to the junction is 197 metres long, increasing by 48 metres, or 8 PCU's, to 245 metres in the Managed Option 1 scenario, a 24% increase, and by 40 metres, or 7 PCU's, to 237 metres in the Managed Option 2 scenario.

For the Unmanaged Option 2 scenario the queue increases to 245 metres, the same increase as experienced in the 2034 Managed (Option 1) scenario. There are continuous queues on this approach throughout the PM peak hour.

There is significant queueing in both peak hours on this arm but specifically in the AM peak hour. The development traffic has a significant effect on this arm, increasing queueing by between 74% and 100% in the AM peak hour. In the PM peak hour, the increases are between 20% and 57%. The results show a material increase in queueing on this arm of the junction, which as far as can be determined, is a considered to be a severe impact.

Junction Summary

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

A4155 Little Marlow Road/Parkway Roundabout

Little Marlow Road West arm

2027

In the AM peak, the 2027 baseline average maximum queue on the Little Marlow Road West approach to the junction is 81 metres long, increasing to 90 metres in the Managed Option 1 scenario and to 91 metres in the Managed Option 2 scenario. For the Unmanaged Option 2 scenario the queue increases to 93 metres.

In the PM peak, the 2027 baseline average maximum queue on the Little Marlow Road West approach to the junction is 91 metres long, increasing to 93 metres in the Managed Option 1 scenario, but reducing to 85 metres in the Managed Option 2 scenario. For the Unmanaged Option 2 scenario the queue would be 88 metres long.

2034

For 2034 in the AM peak, the baseline average maximum queue on the Little Marlow Road West approach to the junction is 85 metres long, increasing by 9 metres to 94 metres in the Managed Option 1 scenario and to 93 in the Managed Option 2 scenarios. For the Unmanaged Option 2 scenario the queue increases to 94 metres.

For 2034 in the PM peak, the baseline average maximum queue on the Little Marlow Road West approach to the junction is 91 metres long, increasing to 93 metres in the Managed Option 1 scenario and reducing to 87 metres in the Managed Option 2 scenario. For the Unmanaged Option 2 scenario the queue would be 88 metres long. For the Unmanaged Option 2 scenario the queue would be 90 metres long.

It can be concluded that the development traffic and the proposed improvements have a minimal effect on this arm but there is already some queueing in the DN scenario.

Little Marlow Road East arm

2027

In the AM peak, the 2027 baseline average maximum queue on the Little Marlow Road East approach to the junction is 175 metres long, increasing by 146 metres, or 25 PCU's, to 321 metres in the Managed Option 1 scenario, an increase of 83% and increasing by 142 metres, or 24 PCU's, to 317 metres in the Managed Option 2 scenario.

For the Unmanaged Option 2 scenario the queue increases by 160 metres, or 28 PCU's, to 335 metres, a 91% increase. There is considerable queueing on this approach throughout the AM peak hour, which at 335 metres, would extend back through the Westhorpe Interchange and along the A4155 up to the site access.

In the evening peak, the 2027 baseline average maximum queue on the Little Marlow Road East approach to the junction is 35 metres long, increasing by 71 metres, or 12 PCU's, to 106 metres in the Managed Option 1 scenario, a 200% increase and increasing by 124 metres, or 22 PCU's, to 159 metres, a 350% increase, in the Managed Option 2 scenario.

For the Unmanaged Option 2 scenario the queue would increase by 156 metres, or 27 PCU's, to 191 metres which is an increase of 445%.

2034

For 2034 in the AM peak, the baseline average maximum queue on the Little Marlow Road East approach to the junction is 202 metres long, increasing by 146 metres, or 25 PCU's, to 348 metres in the Managed Option 1 scenario, a 72% increase, and to 343 in the Managed Option 2 scenarios.

For the Unmanaged Option 2 scenario the queue increases to 396 metres, an increase of 194 metres, or 34 PCU's (96%).

For 2034 in the PM peak, the baseline average maximum queue on the Little Marlow Road East approach to the junction is 49 metres long, increasing by 133 metres, or 23 PCU's, to 182 metres in the Managed Option 1 scenario and by 136 metres, or 24 PCU's, to 185 metres in the Managed Option 2 scenario.

For the Unmanaged Option 2 scenario the queue would be increasing by 209 metres, or 36 PCU's, to 258 metres long, an increase of 427%.

As the impact of the development traffic on this arm is so significant, it is questioned whether the results in the spreadsheet are correct or whether the DS results have been swapped with the Little Marlow Road West arm especially as Paragraph 2.26 of the VISSIM Modelling Note states "...in the AM Peak, the impact of the additional development traffic is mitigated such that a significant decrease in queueing is observed, particularly on the A4155 (East) at Parkway...". However, the results as presented in the information submitted show that the development traffic has a material impact on the queueing at this junction, which is considered to be a severe impact.

Parkway arm

2027

In the AM peak, the 2027 baseline average maximum queue on the Parkway approach to the junction is 30 metres long, increasing to 36 metres in the Managed Option 1 and the Managed Option 2 scenarios. For the Unmanaged Option 2 scenario the queue increases to 37 metres. There is minimal queueing on this approach throughout the AM peak hour.

In the evening peak, the 2027 baseline average maximum queue on the Parkway approach to the junction is 514 metres long, increasing to 516 metres in the Managed Option 1 scenario, but reducing to 387 metres in the Managed Option 2 scenario.

For the Unmanaged Option 2 scenario the queue would be 463 metres long, a reduction of 51 metres. Even in the DN scenario there is considerable queueing on this approach throughout the evening peak period.

2034

For 2034 in the AM peak, the baseline average maximum queue on the Parkway approach to the junction is 36 metres long, increasing to 41 metres in the Managed Option 1 scenario and to 48 in the Managed Option 2 scenarios.

For the Unmanaged Option 2 scenario the queue increases to 44 metres.

For 2034 in the PM peak, the baseline average maximum queue on the Parkway approach to the junction is 517 metres long, remaining at 517 metres in the Managed Option 1 scenario and reducing to 508 metres in the Managed Option 2 scenario.

For the Unmanaged Option 2 scenario the queue would be 516 metres long, a reduction of 1 metre.

It can be concluded that the development traffic has minimal effect on this arm and the mitigation reduces the queues on this arm in the 2027 Option 2 scenario.

Junction Summary

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

A404/A4155 Westhorpe Interchange

This junction forms part of the Strategic Highway Network that falls under the control of National Highways (NH). While NH will be mostly interested in the development traffic impact on the on and off slips to the A404, the HA will still need to carefully consider the impact on the A4155 arms of the junction that fall under the control of the HA.

A404 North off slip road

It should be noted that this arm of the junction links to the A404 and will be of particular interest to National Highways (NH) as this falls under their control. The Local HA will give a view on the operation of this arm; however, NH will ultimately confirm the development traffic impact on this arm.

2027

In the AM peak, the 2027 baseline average maximum queue on the A404 North approach to the junction is 236 metres long, reducing to 186 metres in the Managed Option 1 and to 192 metres in the Managed Option 2 scenarios.

For the Unmanaged Option 2 scenario the queue reduces to 212 metres. There is continuous queueing on this approach throughout the AM peak hour.

In the evening peak, the 2027 baseline average maximum queue on the A404 North approach to the junction is 78 metres long, increasing by 34 metres, or 6 PCU's to 112 metres (44%) in the Managed Option 1 scenario and by 37 metres, or 6 PCU's, to 115 metres, 47%, in the Managed Option 2 scenario.

For the Unmanaged Option 2 scenario the queue would be 108 metres long, an increase of 30 metres or 5 PCU's. There is considerable queueing on this approach throughout the evening peak period.

2034

For 2034 in the AM peak, the baseline average maximum queue on the A404 North approach to the junction is 372 metres long, reducing to 273 metres in the Managed Option 1 scenario and to 292 in the Managed Option 2 scenarios. For the Unmanaged Option 2 scenario the queue increases to 287 metres.

For 2034 in the PM peak, the baseline average maximum queue on the A404 North approach to the junction is 90 metres long, increasing by 54 metres, or 9 PCU's to 144 metres in the Managed Option 1 scenario and by 51 metres, or 8 PCU's, to 141 metres, an increase of 57%, in the Managed Option 2 scenario.

For the Unmanaged Option 2 scenario the queue would be 138 metres long.

This arm sees a reduction in the AM peak hour with the development traffic but an increase in the PM peak hour of 44% to 57% in the PM peak hour, which is considered to be material.

Marlow Road arm (westbound approach)

2027

In the AM peak, the 2027 baseline average maximum queue on the Marlow Road approach to the junction is 137 metres long, increasing by 68 metres, or 12 PCU's, to 205 metres, a 50% increase, in the Managed Option 1 scenario and by 76 metres, or 13 PCU's, to 213 metres, a 55% increase, in the Managed Option 2 scenarios.

For the Unmanaged Option 2 scenario the queue increases by 82 metres, or 14 PCU's, to 219 metres a 60% increase. There is continuous queueing on this approach throughout the AM peak hour.

In the evening peak, the 2027 baseline average maximum queue on the Marlow Road approach to the junction is 77 metres long, increasing by 90 metres, or 15 PCU's, to 167 metres, a 117% increase, in the Managed Option 1 scenario and increasing by 94 metres, or 16 PCU's, to 171 metres in the Managed Option 2 scenario.

For the Unmanaged Option 2 scenario the queue would be increasing by 107 metres, or 19 PCU's, to 183 metres long, a 139% increase. There is queuing on this approach throughout the evening peak period.

2034

For 2034 in the AM peak, the baseline average maximum queue on the Marlow Road approach to the junction is 152 metres long, increasing by 68 metres, or 12 PCU's to 220 metres, a 45% increase in the Managed Option 1 scenario, and by 62 metres, or 11 PCU's, to 214 in the Managed Option 2 scenarios. For the Unmanaged Option 2 scenario the queue increases by 74 metres, or 13 PCU's, to 226 metres.

For 2034 in the PM peak, the baseline average maximum queue on the Marlow Road approach to the junction is 85 metres long, increasing by 96 metres, or 17 PCU's, to 181 metres, a 113% increase, in the Managed Option 1 scenario and to 182 metres in the Managed Option 2 scenario.

For the Unmanaged Option 2 scenario, the queue would be increasing by 106 metres, or 18 PCU's, to 191 metres long, a 125% increase.

This arm is significantly affected by the development traffic in the PM peak hour with queues lengths doubling. In the AM peak hour queues are already long and there are increases in queue lengths of 45% to 60%. In all Do Something scenarios the maximum queues extend beyond the site access junction having the potential to block it. Even the average queues approach the site access junction in the AM peak hour. This is considered to be a severe impact.

A404 South off slip road

It should be noted that this arm of the junction links to the A404 and will be of particular interest to National Highways as this falls under their control. The Local HA will give a view on the operation of this arm; however, NH will ultimately confirm the development traffic impact on this arm.

2027

In the AM peak, the 2027 baseline average maximum queue on the A404 South approach to the junction is 934 metres long, reducing to 300 metres in the Managed Option 1 and to 304 metres in the Managed Option 2 scenarios. For the Unmanaged Option 2 scenario the queue reduces to 280 metres. There is continuous queuing on this approach throughout the AM peak hour, particularly after 0815.

In the evening peak, the 2027 baseline average maximum queue on the A404 South approach to the junction is 117 metres long, increasing by 76 metres, or 13 PCU's, to 193 metres, a 65% increase, in the Managed Option 1 scenario and by 82 metres, or 14 PCU's, to 199 metres in the Managed Option 2 scenario.

For the Unmanaged Option 2 scenario the queue would increase by 86 metres, or 15 PCU's, to 203 metres long, a 74% increase. There is considerable queuing on this approach throughout the evening peak period.

2034

For 2034 in the AM peak, the baseline average maximum queue on the A404 South approach to the junction is 1439 metres long, reducing by 984 metres to 455 metres in the Managed Option 1 scenario and to 453 in the Managed Option 2 scenarios. For the Unmanaged Option 2 scenario the queue reduces by 974 metres to 465 metres.

For 2034 in the PM peak, the baseline average maximum queue on the A404 South approach to the junction is 154 metres long, increasing by 83 metres to 237 metres (54%) in the Managed Option 1 scenario and to 232 metres in the Managed Option 2 scenario.

For the Unmanaged Option 2 scenario the queue would increase by 92 metres to 246 metres long, a 60% increase.

This arm sees a significant reduction in queue length in the AM peak hour with the development traffic but an increase of 54% to 74% in the PM peak hour.

Little Marlow Road arm (eastbound approach)

2027

In the AM peak, the 2027 baseline average maximum queue on the Little Marlow Road approach to the junction is 57 metres long, increasing by 6 metres to 63 metres in the Managed Option 1 scenario and reducing to 53 metres in the Managed Option 2 scenarios. For the Unmanaged Option 2 scenario the queue would reduce to 55 metres. There is a small amount of queuing on this approach throughout the AM peak hour.

In the evening peak, the 2027 baseline average maximum queue on the Little Marlow Road approach to the junction is 71 metres long, increasing to 73 metres in the Managed Option 1 scenario and reducing to 56 metres in the Managed Option 2 scenario. For the Unmanaged Option 2 scenario the queue would also be 56 metres long. There is a small amount of queuing on this approach throughout the AM peak hour.

2034

For 2034 in the AM peak, the baseline average maximum queue on the Little Marlow Road approach to the junction is 57 metres long, increasing to 64 metres in the Managed Option 1

scenario and to 55 in the Managed Option 2 scenarios. For the Unmanaged Option 2 scenario the queue increases to 56 metres.

For 2034 in the PM peak, the baseline average maximum queue on the Little Marlow Road approach to the junction is 71 metres long, increasing to 75 metres in the Managed Option 1 scenario and reducing to 58 metres in the Managed Option 2 scenario. For the Unmanaged Option 2 scenario the queue would be 59 metres long.

It can be concluded that the impact of the development traffic is minimal on this arm in both peak hours.

Junction Summary

The development traffic has a severe impact on the Marlow Road arm with queue lengths doubling in the PM peak hour and queue lengths of 220 metres in AM managed scenario. In all Do Something scenarios the maximum queues extend beyond the site access junction having the potential to block its operation and consequent impacts on its other arms.

The PM also sees increases on the A404 South off Slip road of 54% to 74% although there is a significant improvement in queue length in the AM peak hour. The AM North off slip road sees a small reduction in the AM peak hour with the development traffic but an increase in the PM peak hour of 44 to 57%.

It is considered that the proposed development will result in an unacceptable material impact on the Marlow Road arm of the junction, which forms part of the highway network under the control of the Local HA. It is understood that National Highways will confirm their position with regards to the impact on their part of the network in due course.

A4155 Marlow Road/Pump Lane South/Site Access

Pump Lane South

2027

In the AM peak, the 2027 baseline average maximum queue on the Pump Lane South approach to the junction is 6 metres long, remaining at 6 metres in the Managed Option 1 scenario, the Managed Option 2 scenario and the Unmanaged Option 2 scenario. Very little queuing occurs on this approach during the AM peak hour.

In the evening peak, the 2027 baseline average maximum queue on the Pump Lane South approach to the junction is 12 metres long, reducing to 9 metres in the Managed Option 1 scenario, the Managed Option 2 scenario and the Unmanaged Option 2 scenario. Very little queuing occurs on this approach during the evening peak hour.

2034

For 2034 in the AM peak, the baseline average maximum queue on the Pump Lane South approach to the junction is 9 metres long, reducing to 6 metres in the Managed Option 1 scenario, the Managed Option 2 scenario and the Unmanaged Option 2 scenario.

For 2034 in the PM peak, the baseline average maximum queue on the Pump Lane South Little Marlow Road approach to the junction is 14 metres long, reducing to 9 metres in the Managed Option 1 scenario, the Managed Option 2 scenario and the Unmanaged Option 2 scenario.

It can be concluded that the development traffic and the proposed improvements have a minimal effect on this arm and there is minimal queueing.

Marlow Road East (westbound approach)

2027

In the AM peak, the 2027 baseline average maximum queue on the Marlow Road East approach to the junction is 81 metres long, increasing by 101 metres, or 17 PCU's, to 182 metres, an increase of 125%, in the Managed Option 1 scenario and to 183 metres in the Managed Option 2 scenarios.

For the Unmanaged Option 2 scenario the queue also increases by 101 metres to 182 metres. There is continuous queueing on this approach throughout the AM peak hour, particularly after 08:20.

In the evening peak, the 2027 baseline average maximum queue on the Marlow Road East approach to the junction is 0 metres, increasing to 67 metres, or 12 PCU's in the Managed Option 1 scenario and to 63 metres in the Managed Option 2 scenario. For the Unmanaged Option 2 scenario the queue would be 75 metres, or 13 PCU's, long. There is limited queueing on this approach during the evening peak period.

2034

For 2034 in the AM peak, the baseline average maximum queue on the Marlow Road East approach to the junction is 134 metres long, increasing by 59 metres, or 10 PCU's, to 193 metres in the Managed Option 1 scenario and 193 in the Managed Option 2 scenario. For the Unmanaged Option 2 scenario the queue increases to 194 metres.

For 2034 in the PM peak, the baseline average maximum queue on the Marlow Road East approach to the junction is 18 metres long, increasing by 70 metres, or 12 PCU's to 88 metres in the Managed Option 1 scenario and to 86 metres in the Managed Option 2 scenario. For the Unmanaged Option 2 scenario the queue would increase by 102 metres, or 18 PCU's, and would be 120 metres long.

It can be concluded that there is an unacceptable increase in queueing on this arm in the AM peak hour due to the priority give way to the Marlow Road West arm. The development traffic impact is therefore considered to be severe.

Site Access

2027

In the AM peak, the 2027 baseline average maximum queue on the Site Access approach to the junction is 12 metres long, increasing to 48 metres in the Managed Option 1 and the Managed Option 2 scenarios. For the Unmanaged Option 2 scenario the queue would be 60 metres long.

In the evening peak, the 2027 baseline average maximum queue on the Site Access approach to the junction is 7 metres long, increasing by 89 metres, or 15 PCU's, to 96 metres in the Managed Option 1 scenario and by 94 metres, or 16 PCU's to 101 metres in the Managed Option 2 scenario. For the Unmanaged Option 2 scenario the queue would be 229 metres long, an increase of 222 metres. Considerable queuing occurs on this approach throughout the evening peak hour.

2034

For 2034 in the AM peak, the baseline average maximum queue on the Site Access approach to the junction is 16 metres long, increasing to 49 metres in the Managed Option 1 scenario and to 53 metres in the Managed Option 2 scenario. For the Unmanaged Option 2 scenario the queue would be 69 metres long.

For 2034 in the PM peak, the baseline average maximum queue on the Site Access approach to the junction is 7 metres long, increasing by 102 metres, or 18 PCU's, to 109 metres in the Managed Option 1 scenario, and by 113 metres, or 20 PCU's, to 120 metres in the Managed Option 2 scenario and increasing by 314 metres, or 55 PCU's, to 321 metres in the Unmanaged Option 2 scenario.

As expected, queues on the site access arm are long in the PM peak hour. It is not clear how queues of this length will impact on the internal operation of the development and the applicant has not provided any evidence to show that it would not have a detrimental impact. As it stands the HA has concerns over the operation of a new form of junction providing access to new development and the associated impacts both on and off the site that the shown level of queueing could have.

Marlow Road West (eastbound approach)

2027

In the AM peak, the 2027 baseline average maximum queue on the Marlow Road West approach to the junction is 0 metres long, increasing to 18 metres in the Managed Option 1 scenario and to 15 metres in the Managed Option 2 scenarios. For the Unmanaged Option 2 scenario the queue increases to 30 metres. .

In the evening peak, the 2027 baseline average maximum queue on the Marlow Road West approach to the junction is 0 metres long, increasing to 21 metres in the Managed Option 1

scenario and to 20 metres in the Managed Option 2 scenario. For the Unmanaged Option 2 scenario the queue would be 24 metres long.

2034

For 2034 in the AM peak, the baseline average maximum queue on the Marlow Road West approach to the junction is 0 metres long, increasing to 23 metres in the Managed Option 1 scenario and to 36 in the Managed Option 2 scenario. For the Unmanaged Option 2 scenario the queue reduces to 18 metres.

For 2034 in the PM peak, the baseline average maximum queue on the Marlow Road West approach to the junction is 0 metres long, increasing to 25 metres in the Managed Option 1 scenario and to 26 metres in the Managed Option 2 scenario. For the Unmanaged Option 2 scenario the queue would be 21 metres long.

It can be concluded that the queues on this arm are minimal and are not shown to block back to the Westhorpe Interchange.

A4155 Marlow Road/Westhorpe Farm Lane

Marlow Road West (eastbound approach)

2027

In the AM peak, the 2027 baseline average maximum queue on the Marlow Road West approach to the junction is 0 metres long, increasing to 30 metres in the Managed Option 1 scenario and to 53 metres in the Managed Option 2 scenarios. For the Unmanaged Option 2 scenario the queue increases to 56 metres.

In the evening peak, the 2027 baseline average maximum queue on the Marlow Road West approach to the junction is 0 metres long, increasing to 8 metres in the Managed Option 1 scenario and to 11 metres in the Managed Option 2 scenario. For the Unmanaged Option 2 scenario the queue would be 24 metres long. There is very little queuing on this approach during the evening peak period.

2034

For 2034 in the AM peak, the baseline average maximum queue on the Marlow Road West approach to the junction is 0 metres long, increasing to 63 metres in the Managed Option 1 scenario and to 77 in the Managed Option 2 scenario. For the Unmanaged Option 2 scenario the queue reduces to 22 metres.

For 2034 in the PM peak, the baseline average maximum queue on the Marlow Road West approach to the junction is 0 metres long, increasing to 14 metres in the Managed Option 1

scenario and to 28 metres in the Managed Option 2 scenario. For the Unmanaged Option 2 scenario the queue would be 25 metres long.

It can be concluded that there is minimal queueing on this arm but the development has an effect in the AM peak hour increasing queue lengths in Managed scenarios to 53 to 77 metres.

Marlow Road East (westbound approach)

2027

In the AM peak, the 2027 baseline average maximum queue on the Marlow Road East approach to the junction is 86 metres long, increasing by 262 metres, or 45 PCU's, to 348 metres, an increase of 300% in the Managed Option 1 scenario and to 333 metres in the Managed Option 2 scenarios. For the Unmanaged Option 2 scenario the queue increases to 324 metres.

In the evening peak, the 2027 baseline average maximum queue on the Marlow Road East approach to the junction is 0 metres long, increasing to 14 metres in the Managed Option 1 scenario and to 4 metres in the Managed Option 2 scenario. For the Unmanaged Option 2 scenario the queue would be 11 metres long.

2034

For 2034 in the AM peak, the baseline average maximum queue on the Marlow Road East approach to the junction is 219 metres long, increasing by 165 metres, or 29 PCU's, to 384 metres, an increase of 75%, in the Managed Option 1 scenario and to 382 in the Managed Option 2 scenario. For the Unmanaged Option 2 scenario the queue also increases to 384 metres.

For 2034 in the PM peak, the baseline average maximum queue on the Marlow Road East approach to the junction is 9 metres long, increasing to 29 metres in the Managed Option 1 scenario and to 39 metres in the Managed Option 2 scenario. For the Unmanaged Option 2 scenario the queue would be 36 metres long.

It can be concluded that the proposed development results in significant queue increases in the AM peak hour on this arm, which is considered to be a severe impact

Westhorpe Farm Lane

In the AM peak, the 2027 baseline average maximum queue on the Westhorpe Farm Lane approach to the junction is 4 metres long and remains at 4 metres in the Managed Option 1 scenario, the Managed Option 2 scenario and the Unmanaged Option 2 scenario. Very little queueing takes place during the morning peak hour.

In the evening peak, the 2027 baseline average maximum queue on the Westhorpe Farm Lane approach to the junction is 2 metres long and remains at 2 metres in the Managed Option 1

scenario, the Managed Option 2 scenario and the Unmanaged Option 2 scenario. Very little queuing takes place during the evening peak hour.

2034

For 2034 in the AM peak, baseline average maximum queue on the Westhorpe Farm Lane approach to the junction is 4 metres long and remains at 4 metres in the Managed Option 1 scenario, the Managed Option 2 scenario and the Unmanaged Option 2 scenario.

For 2034 in the PM peak, the baseline average maximum queue on the Westhorpe Farm Lane approach to the junction is 3 metres long and remains at 3 metres in the Managed Option 1 scenario, the Managed Option 2 scenario and the Unmanaged Option 2 scenario.

Junction Summary

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

Overall Summary

The spreadsheet data, queue profiles, heatmaps and videos show that the proposed development will result in significant increases in queueing in the AM peak hour in particular on the A4155 through the modelled area affecting a number of junctions with long queues also occurring on the site access itself.

Overall, it is the position of the Local HA that the VISSIM modelling demonstrates that the development traffic will result in a severe impact on the operation of the local highway network as submitted and further information would be required to show if and how this can be adequately mitigated.

Wide Area Network Assessment

Section 5 of the STA looks at the assessment on the wider highway network. This assessment was originally included in a Briefing Note, however the assessment, and associated information is now contained in the STA. While the majority of the information in the STA is consistent with the information contained in the Briefing Note, the STA contains updated assessments mainly for the junctions on the National Highways network.

Following discussions between the applicant, National Highways and the Council, it has been agreed that the applicant carries out detailed junction impact assessments of 11 further junctions on the local highway network. The Briefing Note states that junctions subject to further assessment are as follows:

1. M40 Junction 4 – Handy Cross Roundabout – National Highways to confirm requirements. BC would also like to understand any impact on the Local Highway Authority network;
2. A404 / Marlow Road ‘Bisham’ Roundabout – National Highways to confirm requirements;
3. Wiltshire Road / A4155 Little Marlow Road Roundabout;
4. Newtown Road / A4155 Little Marlow Road / Bobmore Lane priority staggered crossroads;
5. Glade Road / A4155 Little Marlow Road priority T-junction;
6. Wycombe Road / A4155 Little Marlow Road priority T-junction – Not previously included;
7. A4155 Chapel Street / B482 Dean Street / A4155 Marlow Road mini-roundabout;
8. High Street / A4155 Marlow Road / A4155 West Street mini-roundabout;
9. Winchbottom Lane / A4155 Marlow Road priority T-junction (Little Marlow);
10. Sheepridge Lane / A4155 Marlow Road mini-roundabout (Bourne End);
11. Blind Lane / A4155 Marlow Road priority T-junction;
12. A4155 Cores End Road / The Parade / Station Road mini-roundabout.

Survey Data

The applicant has explained that additional Manual Classified Turning Count and Queue Length traffic surveys have been undertaken during July 2023 at the identified Local Road Network (LRN) junctions on the A4155 corridor to obtain current 2023 baseline data, upon which the current detailed assessments are based.

The STA also explains that traffic flows for junctions on the Strategic Road Network (SRN) have been factored to reflect observed changes in network traffic flow between 2021 and 2023 observed data at Westhorpe Interchange.

Scenarios

The applicant explains that the following scenarios have been tested:

- Observed (Existing) Baseline (for model calibration);
- 2027 Future Baseline;
- 2034 Future Baseline;
- 2027 Baseline plus Managed Development;
- 2034 Baseline plus Managed Development;
- 2027 Baseline plus Unmanaged Development;
- 2034 Baseline plus Unmanaged Development;
- 2027 Baseline plus Reasonable Unmanaged Development; and
- 2034 Baseline plus Reasonable Unmanaged Development.

TEMPro has been used to factor up the 2023 flows to 2027 and 2034. The TEMPro data has been reviewed and is considered to be acceptable.

As explained in previous highways responses, there remains concern that the mode share targets proposed by the applicant are ambitious and unlikely to be achieved. Appropriate mitigation measures are therefore required should model shift targets not be achieved.

Strategic Road Network Assessment

Handy Cross Roundabout

Handy Cross is the grade separated traffic signalled controlled junction between the M40 and the A404 which also connects High Wycombe to the M40. It is located approximately 3.5km to the north of the Westhorpe Interchange. The junction forms part of the SRN managed by National Highways, however the A4010, Marlow Road, Marlow Hill and Wycombe Road approaches are part of the local highway network maintained by BC.

In consultation with National Highways, a bespoke LinSig based assessment of the A404 and M40 approaches at the Handy Cross Interchange has been undertaken.

The STA states in paragraph 5.59 that:

“A simple assessment has been provided for the A4010 and A404 North approaches to Handy Cross interchange in the morning peak.”

It goes on to state in paragraph 5.61 that:

“The average additional demand per lane for the A4010 entry would be 0.3 pcu cycle, or 1 pcu every third cycle. This increase is not considered significant.”

It also states in 5.62 that:

“The average additional demand per lane for the A404 North entry would be 1.1 pcu per cycle when considered over a single lane.”

While it has not been explained how the 0.3 PCU and 1.1 PCU per cycle has been obtained, it has been assumed that the hourly increase in PCUs, 34 and 54, has been divided by the number of cycles in the AM peak hour. The Briefing Note explains that the cycles are 72 seconds, which would result in 50 cycles in the AM peak hour. The A4010 has two entry lanes, therefore the increase would be 0.3 PCU per lane. The A404 entry has one lane towards the A404 as the other two lanes are for the M40. Therefore, the increase is 1.1 PCU per cycle.

In addition to demand per cycle the hourly % increase has been shown in Table 28 on page 77 of the TAA2. It shows an increase of 3% on the A4010 in the unmanaged growth scenario in the AM peak hour and 4.65% on Marlow Hill. In the PM peak hour, shown in Table 29, the increase is less, with 0.85% increase in the unmanaged growth scenario on the A4010 and 1.63% in the PM peak hour.

Following a review of this information it is concluded that the impact of the development proposals on the operation of the A4010 arm and the Marlow Hill arm of the Handy Cross

Interchange is likely to be minimal and mitigation measures are therefore not required to improve capacity on these arms.

A404 / Marlow Road 'Bisham' Roundabout

As this junction is located on part of the network that falls under the control of National Highways, in addition to it being located outside of Buckinghamshire, National Highways will provide comments.

Local Road Network Assessment

A4155 Little Marlow Road / Wiltshire Road Roundabout

Paragraph 5.92 of the STA states the following:

"The A4155 Little Marlow Road / Wiltshire Road Roundabout is included within the Westhorpe Interchange VISSIM model, which enables a microsimulation assessment of the junction. The VISSIM model provides an assessment of the impact of the Proposed Development upon the Wiltshire Road roundabout in the context of the adjoining network and reflecting the interaction of traffic effects on the A4155 corridor and at adjacent junctions."

Paragraph 5.93 of the STA goes onto state:

"On this basis the VISSIM model is considered to represent a more accurate assessment of the impact of the Proposed Development upon this junction than a standalone capacity model. Accordingly a Junctions 10 ARCADY model has not been prepared for this junction, which will be assessed with reference to the emerging VISSIM model."

A review of this junction has therefore been conducted as part of the VISSIM model review.

A4155 Little Marlow Road / Bobmore Lane / Newton Road Junction

This is a staggered priority junction with Bobmore Lane located north west of Newton Road. A Zebra Crossing facility is located on the A4155 Little Marlow Road western arm, 20m west of Bobmore Lane.

The geometry has been checked and is correct, however, the zebra crossing on the western arm has not been included in the model. The applicant should have included this zebra crossing as well as reasonable demand on the crossing. The flows have been checked and are consistent with the flow matrices provided. However, the 2023 modelled queues have been compared with the recorded queues in the queue survey and there are significant differences in the PM peak hour with queue lengths of over 13 vehicles on the Little Marlow Road Eastbound arm. It is therefore considered that the junction is not correctly calibrated, therefore the future year modelling results may be unreliable.

Times	Bobmore Lane		Little Marlow Road WB Right-Turn		Newtown Road		Little Marlow Road EB Right-Turn	
	Lane 1		Lane 1		Lane 1	Lane 2	Lane 1	
17:00 - 17:05	2		7		5	0	2	
17:05 - 17:10	2		1		7	0	3	
17:10 - 17:15	2		7		8	0	3	
17:15 - 17:20	2		1		10	0	7	
17:20 - 17:25	3		2		11	0	2	
17:25 - 17:30	3		2		12	0	12+	
17:30 - 17:35	6		4		16	0	12+	
17:35 - 17:40	8		2		11	0	13+	
17:40 - 17:45	7		6		10	0	12+	
17:45 - 17:50	9		0		9	0	11+	
17:50 - 17:55	5		9		10	0	13+	
17:55 - 18:00	6		4		7	0	13+	

Junction Arm	AM Peak			PM Peak		
	RFC	Queue (PCUs)	Delay (s)	RFC	Queue (PCUs)	Delay (s)
2023 Observed Flows						
Newtown Rd	0.45	0.8	19.47	0.59	1.4	22.44
A4155 WB Right-turn into Bobmore Lane	0.22	0.4	7.83	0.38	0.9	7.86
Bobmore Lane	0.32	0.5	10.14	0.23	0.3	8.01
A4155 EB Right-turn into Newtown Road	0.24	0.4	7.26	0.14	0.2	7.54

Paragraph 5.102 of the STA states:

“It should be noted that this junction is occasionally impacted by queueing which extends back from downstream junctions causing exit blocking and therefore does not always operate as a standalone junction. This junction may also experience occasional delays resulting from pedestrians crossing the A4155 at the zebra crossing located to the west of this junction during peak periods.”

However, a review of queue lengths shows consistent queueing rather than short periods of congestion. The survey shows queues of 14+ vehicles but this could be significantly more vehicles. It is therefore considered that the base model for this junction in the Wider Network Assessment does not reflect existing conditions and, therefore, the results from the future

year modelling are unreliable. The HA is therefore not in a position to determine that the development traffic impact at this junction is not severe.

A4155 Little Marlow Road / Glade Road Junction

The junction of the A4155 Little Marlow Road with Glade Road is a priority T-junction with a ghost island right-turn facility. The ghost island is 24m long and would accommodate approximately 4 PCUs.

The geometry of the model has been checked and it would appear that there are significant errors. The width of the A4155 is 5.7m rather than 6.55m. The Little Marlow Road right turn only accommodates 4 vehicles before it blocks, and this has not been reflected in the model which shows no blocking. Also, kerbed central reserve has been ticked while there is none.

The flows have been checked and it is noted that, in both the spreadsheet and the PICADY model, the peak hour flows on the Glade Road and Little Marlow Road East arms have been switched when compared to the survey data. The 2023 modelled queues have been compared with the recorded queues in the queue survey and there are differences in both peak hours with queues on both Glade Road and Little Marlow Road Eastbound arm. This will mainly be the result of the errors in data entry and geometry as described above, but the junction also needs to be calibrated against recorded vehicle queues.

Times	Glade Road		Little Marlow Road Right-Turn	
	Lane 1	Lane 2	Lane 1	
08:00 - 08:05	2	4	7	
08:05 - 08:10	4	2	6	
08:10 - 08:15	1	3	1	
08:15 - 08:20	2	3	3	
08:20 - 08:25	1	2	3	
08:25 - 08:30	2	2	1	
08:30 - 08:35	4	2	2	
08:35 - 08:40	1	1	1	
08:40 - 08:45	1	1	3	
08:45 - 08:50	3	3	4	
08:50 - 08:55	3	2	0	
08:55 - 09:00	1	1	4	

Table 12: A4155 Little Marlow Road j/w Glade Road – Junctions 10 (PICADY) Results

Junction Arm	AM Peak			PM Peak		
	RFC	Queue (PCUs)	Delay (s)	RFC	Queue (PCUs)	Delay (s)
2023 Observed Flows						
Glade Road (Left-turn lane)	0.56	1.4	14.59	0.50	1.0	12.53
Glade Road (Right-turn lane)	0.36	0.6	16.09	0.30	0.4	11.65
A4155 Little Marlow Rd (EB right-turn to Glade Road)	0.65	1.9	17.49	0.25	0.3	8.20

Due to the geometry and data errors and lack of calibration, the base model for this junction in the Wider Network Assessment does not reflect existing conditions and, therefore, the results from the future year modelling are unreliable. The HA is therefore not in a position to confirm that the development traffic impact at this junction is not severe.

A4155 Little Marlow Road / Wycombe Road Junction

The junction of the A4155 Little Marlow Road with Wycombe Road is a priority T-junction with a ghost island right-turn facility, located approximately 50m west of Glade Road. The ghost island is 40m long and would therefore accommodate approximately 7 vehicles.

The geometry of the model has been checked and the peak hour flows from Wycombe Road to Little Marlow Road East and West have been switched in the PICADY file. The width of the A4155 is 5.7m rather than 6.7m. The Little Marlow Road right turn only accommodates 7 vehicles before it blocks, and this has not been reflected in the model which shows no blocking. The model shows there is a flare of 1 vehicle on Wycombe Road but there is not sufficient width, and an error code is shown in the model.

The flows have been checked and the 2023 modelled queues have been compared with the recorded queues in the queue survey and there are significant differences with queues on both Wycombe Road and Little Marlow Road especially in the AM peak hour.

Times	Wycombe Road		Little Marlow Road Right-Turn	
	Lane 1	Lane 2	Lane 1	Lane 2
08:00 - 08:05	1	3	6	0
08:05 - 08:10	1	6	0	1
08:10 - 08:15	0	7	0	2
08:15 - 08:20	0	5	8	1
08:20 - 08:25	0	6	10	0
08:25 - 08:30	0	6	0	0
08:30 - 08:35	1	9	0	1
08:35 - 08:40	0	12	4	1
08:40 - 08:45	1	9	0	1
08:45 - 08:50	0	7	0	0
08:50 - 08:55	1	2	0	1

Table 13: A4155 Little Marlow Road j/w Wycombe Road – Junctions 10 (PICADY) Results

Junction Arm	AM Peak			PM Peak		
	RFC	Queue (PCUs)	Delay (s)	RFC	Queue (PCUs)	Delay (s)
2023 Observed Flows						
Wycombe Road (Left-turn Flare)	0.16	0.2	7.01	0.09	0.1	6.22
Wycombe Road (Right-turn Lane)	0.31	0.4	14.11	0.19	0.2	13.04
A4155 Little Marlow Rd (WB right-turn to Wycombe Road)	0.09	0.1	7.19	0.25	0.3	9.25

Due to the geometry errors and lack of calibration, the base model for this junction in the Wider Network Assessment does not reflect existing conditions and, therefore, the results from the future year modelling are unreliable. The HA is therefore not in a position to confirm that the development traffic impact is not severe.

A4155 Chapel Street / B482 Dean Street / A4155 Marlow Road Junction

The junction of the A4155 Chapel Street with B482 Dean Street and A4155 Marlow Road is a three-arm mini-roundabout junction, located approximately 275m west of Wycombe Road. Zebra Crossing facilities are located on the Dean Street arm 20m north of the junction and the Marlow Road 6m south-west of the junction.

The geometry has been checked and is correct, however, the zebra crossings have not been included in the model.

Paragraph 5.134 of the STA states:

“It should be noted that this junction is occasionally impacted by queueing which extend back from downstream junctions during peak periods and therefore does not always operate as a standalone junction.”

However, the survey shows continuous queueing in both peak hours of over 46 vehicles on the Chapel Street (eastern) arm while the modelled queue is 1 vehicle. On the Dean Street (north western) arm there is continuous queueing of 15 to 18 vehicles while the model shows 2 to 3 vehicles. It is clear that the model has not been calibrated and the modelling is therefore not considered representative of the operation of the junction. Once the model has been calibrated correctly consideration should be given to the interaction between this junction and the mini roundabout to the south west should there be queueing back along the link to that junction. It maybe that the two junctions need to be modelled in ARCADY as linked mini roundabouts with a queue limited link between them.

	AM Peak 0800-0900		PM Peak 1700-1800	
	Observed Queue Ave (Max)	Modelled Queue	Observed Queue Ave (Max)	Modelled Queue
A4155 Chapel St	46+ (48+)	1	48 (49)	0.7
A4155 Marlow Road	4 (7)	0.8	9 (19)	1
B482 Dean Street	18 (19)	2.4	15 (19+)	1.7

Times	Dean Street B482		Chapel street		A4155 Marlow Road	
	Lane 1	Lane 2	Lane 1	Lane 2	Lane 1	Lane 2
08:00 - 08:05	16+	0	45+	0	1	
08:05 - 08:10	18+	1	46+	1	5	
08:10 - 08:15	17+	1	45+	0	1	
08:15 - 08:20	17+	0	44+	0	5	
08:20 - 08:25	16+	0	47+	0	3	
08:25 - 08:30	17+	1	46+	0	6	
08:30 - 08:35	17+	1	47+	1	2	
08:35 - 08:40	17+	0	48+	0	2	
08:40 - 08:45	17+	0	46+	0	7	
08:45 - 08:50	17+	0	45+	0	6	
08:50 - 08:55	17+	0	46+	0	4	
08:55 - 09:00	17+	0	46+	0	2	
09:00 - 09:05	16+	0	45+	0	8	

Times	Dean Street B482		Chapel street		A4155 Marlow Road	
	Lane 1	Lane 2	Lane 1	Lane 2	Lane 1	Lane 2
17:00 - 17:05	9	0	44	1	11	
17:05 - 17:10	16	1	46+	1	1	
17:10 - 17:15	13	1	47+	0	5	
17:15 - 17:20	15	1	46+	0	9	
17:20 - 17:25	11	1	48+	0	5	
17:25 - 17:30	16+	0	47+	1	16	
17:30 - 17:35	16+	0	47+	1	8	
17:35 - 17:40	18+	1	48+	0	17	
17:40 - 17:45	18+	0	48+	1	3	
17:45 - 17:50	16+	0	47+	0	7	
17:50 - 17:55	10	0	48+	0	19	
17:55 - 18:00	16+	1	48+	1	7	

Table 14: A4155 Chapel Street j/w Marlow Road – Junctions 10 (ARCADY) Results

Junction Arm	AM Peak			PM Peak		
	RFC	Queue (PCUs)	Delay (s)	RFC	Queue (PCUs)	Delay (s)
2023 Observed Flows						
A4155 Chapel Street	0.48	1.0	8.69	0.42	0.7	7.40
A4155 Marlow Road	0.43	0.8	6.53	0.50	1.0	7.47
B482 Dean Street	0.70	2.4	16.77	0.62	1.7	13.54

Due to the lack of calibration, the base model for this junction in the Wider Network Assessment does not reflect existing conditions and, therefore, the results from the future year modelling are unreliable. The HA is therefore not in a position to confirm that the development traffic impact at this junction is not severe.

A4155 Marlow Road / High Street / A4155 West Street Mini-Roundabout

The junction of the A4155 Marlow Road with High Street and A4155 West Street is a three-arm mini roundabout junction, located approximately 145m south-west of Dean Street.

The geometry has been checked and it was considered that the High Street arm is 7m not 7.3m although this is unlikely to have a significant effect on the modelling. This junction also experienced continuous queueing throughout the entire peak periods on all arms with observed average queues between 10 and 24 vehicles while the model shows queues of less than 1 vehicle on all arms. The modelling is therefore not considered representative of the operation of the junction.

	AM Peak 0800-0900		PM Peak 1700-1800	
	Observed Queue Ave (Max)	Modelled Queue	Observed Queue Ave (Max)	Modelled Queue
A4155 Marlow Road	14 (14)	0.7	13 (13)	0.5
High Street	24 (29+)	0.7	23 (27)	0.7
A4155 West Street	10 (10+)	0.5	10 (10+)	0.6

Times	Marlow Road		High Street W/B		West Street	
	Lane 1	Lane 2	Lane 1	Lane 2	Lane 1	Lane 2
08:00 - 08:05	14		29+		9+	
08:05 - 08:10	14		25		10+	
08:10 - 08:15	13		19		10+	
08:15 - 08:20	14		26		10+	
08:20 - 08:25	13		23		10+	
08:25 - 08:30	14		16		10+	
08:30 - 08:35	13		21		10+	
08:35 - 08:40	14		22		10+	
08:40 - 08:45	13		21		10+	
08:45 - 08:50	14		23		10+	
08:50 - 08:55	14		26		10+	
08:55 - 09:00	13		30+		9+	

Table 15: A4155 Marlow Road j/w High Street & West Street – Junctions 10 (ARCADY) Results

Junction Arm	AM Peak			PM Peak		
	RFC	Queue (PCUs)	Delay (s)	RFC	Queue (PCUs)	Delay (s)
2023 Observed Flows						
A4155 Marlow Road	0.41	0.7	6.57	0.34	0.5	5.68
High Street	0.41	0.7	6.89	0.41	0.7	6.53
A4155 West Street	0.34	0.5	5.60	0.37	0.6	6.04

Due to the lack of calibration, the base model for this junction in the Wider Network Assessment does not reflect existing conditions and, therefore, the results from the future year modelling are unreliable.

A4155 Marlow Road / Sheepridge Lane, Little Marlow Mini Roundabout

The junction of the A4155 Marlow Road with Sheepridge Lane is a three-arm mini roundabout located in Little Marlow approximately 2.3km east of Westhorpe Interchange.

There are some minor discrepancies between the geometry on the plan and the geometry in the model. The A4155 Marlow Road West approach half road width is coded as 3.6m in the model but measures and is printed as 3.5m on the plan. On the Marlow Road East approach, the approach half road width is coded as 3.5m but is measured and printed as 3.4m on the plan. Otherwise, the geometry is correct, and these discrepancies will have minimal impact.

The flow data in the spreadsheet has been checked and it appears that that the development flows from the A4155 / West Street junction (managed and unmanaged) have been added to the base flows of this junction for both the 2027 and 2034.

Whilst the model validates well against observed queues as shown in the table below, it was noted that the summary output table, Table 21 on page 65 of the STA, does not correspond at all with the output file in Appendix T which shows queues of 121 vehicles on Marlow Road West. It is assumed that this junction has been calibrated and the wrong output data has been attached. However, without the correct output data, it has not been possible to check the modelling.

	PM Peak 1700-1800	
	Observed Queue Ave (Max)	Modelled Queue
A4155 Marlow Road West	4 (9)	9
Sheepridge Lane	5 (6)	6
A4155 Marlow Road East	5 (9)	8

Table 21: A4155 Marlow Road j/w Sheepridge Lane – Junctions 10 (ARCADY) Results

Junction Arm	PM Peak		
	RFC	Queue (PCUs)	Delay (s)
2023 Observed Flows			
A4155 Marlow Road (W)	0.91	8.9	32.49
Sheepridge Lane	0.88	5.5	71.49
A4155 Marlow Road (E)	0.91	8.0	41.57

Summary of junction performance

	PM		
	Queue (PCU)	Delay (s)	RFC
2023 Existing Base			
1 - A4155 Marlow Rd (W)	121.0	509.98	1.24
2 - Sheepridge Lane	1.6	19.62	0.62
3 - A4155 Marlow Rd (E)	2.9	14.56	0.75

The STA only includes the PM results only as the initial impact assessment demonstrated that a further detailed assessment was not required in the AM.

The PM peak hour shows that the junction is approaching capacity in the 2027 Do Minimum Scenario and is at capacity in the 2034 Do Minimum Scenario. In the 2027 Do something Managed Scenario, the Sheepridge Lane arm increases by 28 vehicles from 8 to 36 and in the 2027 Unmanaged Scenario, it increases by 45 vehicles from 8 to 53 vehicles with an increase in waiting time on Sheepridge Lane of 5.5 minutes. In the 2034 Managed Scenario the queue

on this arm increases by 35.5 vehicles and the waiting time increases by nearly 5 minutes. With the 2034 Unmanaged Scenario, it increases by 53.5 vehicles with an increase in waiting time of 8 minutes.

This is an unacceptable increase in queuing and delay and mitigation would therefore be required. However, no mitigation has been proposed and instead paragraph 5.144 of the STA states the following:

“It is not considered likely that the additional demand forecast by the Proposed Development will be significant in terms of the day-to-day operation of the Sheepridge Lane junction, and the forecast increase in queue lengths and delay on the junction approaches are not considered material relative to the baseline values. The forecast impact of all scenarios is therefore not considered severe in terms of the NPPF test.”

Increases in waiting times that range from 5 to 8 minutes are considered significant and material increases, along with significant increases in queueing, all leading to an unacceptable impact on the junction. Therefore suitable mitigation of the development traffic impact should be considered. However, the applicant has not considered any form of mitigation for the junction and therefore the HA considers that the development traffic impact at this junction remains severe.

Junction Arm	PM Peak		
	RFC	Queue (PCUs)	Delay (s)
2027 Base			
A4155 Marlow Road (W)	0.94	11.7	41.36
Sheepridge Lane	0.94	7.9	96.93
A4155 Marlow Road (E)	0.94	10.1	51.14
2034 Base			
A4155 Marlow Road (W)	0.99	19.9	64.90
Sheepridge Lane	1.04	14.6	160.54
A4155 Marlow Road (E)	0.98	15.8	74.02
Base 2027 + Managed Development			
A4155 Marlow Road (W)	0.96	13.9	48.37
Sheepridge Lane	1.20	36.2	312.38
A4155 Marlow Road (E)	0.95	11.8	58.55
Base 2034 + Managed Development			
A4155 Marlow Road (W)	1.00	24.3	76.51
Sheepridge Lane	1.30	50.1	454.95
A4155 Marlow Road (E)	0.99	17.3	79.80
Base 2027 + Unmanaged Development			
A4155 Marlow Road (W)	0.96	15.1	51.99
Sheepridge Lane	1.30	53.0	434.66
A4155 Marlow Road (E)	0.95	12.0	59.19
Base 2034 + Unmanaged Development			
A4155 Marlow Road (W)	1.01	26.6	82.26
Sheepridge Lane	1.40	69.3	639.59
A4155 Marlow Road (E)	0.99	17.7	80.99

A4155 Marlow Road / Blind Lane, Bourne End Junction

The junction of the A4155 Marlow Road with Blind Lane is a priority T-junction, located approximately 965m south-east of Sheepridge Lane in Bourne End.

The STA includes the PM results only as the previous assessment work concluded that a further detailed assessment in the AM peak hour was not required.

The geometry has been checked. The model shows there is a flare of 1 vehicle on Blind Lane but there is not sufficient width, and an error code is shown in the model.

The flow data in the spreadsheet has been checked and it appears that that the development flows from the A4155 / West Street junction (managed and unmanaged) have been added to the base flows of this junction for both the 2027 and 2034.

The junction does not calibrate well with the surveyed queues. Due to the geometry and data entry errors and lack of calibration, the base model for this junction in the Wider Network Assessment does not reflect existing conditions and, therefore, the results from the future year modelling are unreliable. The HA is therefore not in a position to confirm that the development traffic impact at this junction is not severe.

	PM Peak 1700-1800	
	Observed Queue Ave (Max)	Modelled Queue
Blind Lane	3 (6)	0.4
A4155 Marlow Road South	6 (11)	1.3

Junction Arm	PM Peak		
	RFC	Queue (PCUs)	Delay (s)
2023 Observed Flows			
Blind Lane (Left-turn flare)	0.23	0.3	10.65
Blind Lane (Right-turn lane)	0.30	0.4	26.29
A4155 Marlow Road (NB right-turn to Blind Lane)	0.43	1.3	8.65

Times	Blind Lane		Marlow Road Right-Turn	
	Lane 1	Lane 2	Lane 1	
17:00 - 17:05	4	1	7	
17:05 - 17:10	2	0	7	
17:10 - 17:15	5	1	8	
17:15 - 17:20	4	0	5	
17:20 - 17:25	2	0	2	
17:25 - 17:30	2	0	5	
17:30 - 17:35	3	0	5	
17:35 - 17:40	2	1	4	
17:40 - 17:45	2	0	3	
17:45 - 17:50	6	1	5	
17:50 - 17:55	1	0	11	
17:55 - 18:00	2	0	11	

A4155 The Parade / Cores End Road / Station Road, Bourne End Mini-Roundabout

The junction of the A4155 The Parade with A4155 Cores End Road and A4155 Station Road is a three-arm mini-roundabout junction, located approximately 410m south-east of Blind Lane in Bourne End.

The STA only includes the PM results only as the initial assessment work concluded that a further detailed assessment was not required in the AM peak. The geometry has been checked and appears correct.

The flow data in the spreadsheet has been checked and it appears that the development flows from the A4155 / West Street junction (managed and unmanaged) have been added to the base flows of this junction for both the 2027 and 2034.

It was noted that the summary output table, Table 24 on page 70 of the STA, does not correspond with the output file in Appendix V. It is assumed that the junction has been calibrated to queues on Station Road of 14 vehicles and the wrong output file has been attached. However, the survey shows queues of 14+ vehicles which could well be 31 vehicles as the modelling suggests. Without the correct output data, it has not been possible to check the modelling.

Summary of junction performance

	PM		
	Queue (PCU)	Delay (s)	RFC
2023 Existing Base			
1 - A4155 The Parade	6.6	30.71	0.88
2 - A4155 Cores End Road	2.2	15.07	0.69
3 - A4155 Station Road	31.4	186.08	1.08

Table 24: A4155 The Parade j/w Cores End Road and Station Road– Junctions 10 (ARCADY) Results

Junction Arm	PM Peak		
	RFC	Queue (PCUs)	Delay (s)
2023 Observed Flows			
A4155 The Parade	0.90	8.0	37.09
A4155 Cores End Road	0.97	12.7	90.15
A4155 Station Road	0.98	13.9	89.70

Times	The Parade		Cores End Road		Station Road	
	Lane 1	Lane 2	Lane 1	Lane 2	Lane 1	Lane 2
17:00 - 17:05	3		6		12+	
17:05 - 17:10	8		9		13	
17:10 - 17:15	1		6		14+	
17:15 - 17:20	5		7		6	
17:20 - 17:25	8		6		7	
17:25 - 17:30	3		5		14+	
17:30 - 17:35	3		9		14+	
17:35 - 17:40	1		14		14+	
17:40 - 17:45	1		4		11	
17:45 - 17:50	4		4		13+	
17:50 - 17:55	1		3		1	
17:55 - 18:00	3		4		8	

Junction Arm	PM Peak		
	RFC	Queue (PCUs)	Delay (s)
2023 Observed Flows			
A4155 The Parade	0.90	8.0	37.09
A4155 Cores End Road	0.97	12.7	90.15
A4155 Station Road	0.98	13.9	89.70
2027 Base			
A4155 The Parade	0.93	9.9	45.11
A4155 Cores End Road	1.01	17.6	117.34
A4155 Station Road	1.01	18.1	110.59
2034 Base			
A4155 The Parade	0.97	15.8	66.87
A4155 Cores End Road	1.08	29.2	177.32
A4155 Station Road	1.06	27.9	157.01

Junction Arm	PM Peak		
	RFC	Queue (PCUs)	Delay (s)
Base 2027 + Managed Development			
A4155 The Parade	1.02	26.1	98.80
A4155 Cores End Road	1.07	27.7	173.21
A4155 Station Road	1.00	17.5	108.03
Base 2034 + Managed Development			
A4155 The Parade	1.07	43.3	149.82
A4155 Cores End Road	1.12	39.4	249.83
A4155 Station Road	1.07	31.5	172.51
Base 2027 + Unmanaged Development			
A4155 The Parade	1.06	41.3	143.57
A4155 Cores End Road	1.08	30.4	188.80
A4155 Station Road	1.03	22.2	130.06
Base 2034 + Unmanaged Development			
A4155 The Parade	1.11	59.2	201.59
A4155 Cores End Road	1.13	42.5	277.46
A4155 Station Road	1.08	33.8	182.79
Base 2027 + Reasonable Unmanaged Development			
A4155 The Parade	1.05	35.1	125.86
A4155 Cores End Road	1.08	29.4	183.09
A4155 Station Road	1.03	21.6	127.11
Base 2034 + Reasonable Unmanaged Development			
A4155 The Parade	1.09	52.5	176.35
A4155 Cores End Road	1.13	41.8	270.26
A4155 Station Road	1.08	32.8	178.53

Notwithstanding the above, the modelling shows that the junction currently has exceeded practical capacity and will reach theoretical capacity in 2027. The development traffic will have a significant effect on The Parade arm of the junction with queues increasing by 16 vehicles in the 2027 Managed Scenario and by 31 vehicles, from 10 to 41 vehicles, in the 2027 Unmanaged Scenario. In the Reasonable Managed Scenario there was an increase of 25 vehicles on this arm.

In 2034, The Parade arm increases by 27.5 vehicles in the Managed Scenario, by 36.7 vehicles in the Reasonable Managed Scenario and by 43.4 vehicles in the Unmanaged Scenario. This is an unacceptable impact, and it is therefore likely that mitigation is required.

Wide Area Network Assessment Summary

The Wider Network Impact Briefing Note has been reviewed and the following can be concluded:

- **Handy Cross Roundabout** - The impact of the development proposals on the operation of the A4010 arm and the Marlow Hill arm of the Handy Cross Interchange is likely to be minimal and mitigation measures are therefore not required on these arms.
- **A404 / Marlow Road 'Bisham' Roundabout** - As this junction is not located in Buckinghamshire, National Highways will provide comments.
- **Wiltshire Road / A4155 Little Marlow Road Roundabout** - A review of this junction has been conducted as part of the VISSIM model review.
- **Newtown Road / A4155 Little Marlow Road / Bobmore Lane crossroads** – It has not been demonstrated that the proposed development will not have a severe impact on the junction.
- **Glade Road / A4155 Little Marlow Road priority T-junction** - It has not been demonstrated that the proposed development will not have a severe impact on the junction.
- **Wycombe Road / A4155 Little Marlow Road priority T-junction** - It has not been demonstrated that the proposed development will not have a severe impact on the junction.
- **A4155 Chapel Street / B482 Dean Street / A4155 Marlow Road mini roundabout** - It has not been demonstrated that the proposed development will not have a severe impact on the junction.
- **High Street / A4155 Marlow Road / A4155 West Street mini roundabout** - It has not been demonstrated that the proposed development will not have a severe impact on the junction.
- **Sheepridge Lane / A4155 Marlow Road mini roundabout (Bourne End)** – Although there are errors in the modelling and it has not been possible to check the modelling output, it appears that the proposed development has a material impact at the junction and appropriate mitigation should have been considered by the applicant. It has not been demonstrated that the proposed development will not have a severe impact on the junction.

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

Summary and Conclusions

It is evident from the comments contained within this letter that there are issues relating to the internal layout, the Sustainable Travel Strategy, sustainable transport connectivity and traffic impact that remain unresolved and outstanding. As such the Highway Authority cannot conclude at this stage that the development is acceptable, well connected with safe and suitable access and would not lead to a severe impact on road safety and network operation.

It is understood that the Local Planning Authority wish to determine this application as submitted, therefore the Highway Authority would recommend the refusal of planning permission for the following reasons:

Reason 1: Insufficient information has been submitted with the planning application to enable the highways, traffic and transportation implications of the proposed development to be fully assessed. From the information submitted, it is considered that the additional traffic likely to be generated by the proposal would have a severe impact on the safety and flow of users of the existing distributor road network, and lead to additional on-street parking, contrary to the National Planning Policy Framework, Policy DM33 (Managing Carbon Emissions: Transport and Energy Generation) of the Wycombe District Local Plan (adopted August 2019), Buckinghamshire Council Local Transport Plan 4 (adopted April 2016) and the Buckinghamshire Council Highways Development Management Guidance document (adopted July 2018).

Reason 2: The proposed development fails to make adequate provision to allow accessibility to the site by non-car modes of travel. The development will therefore be heavily reliant on the use of the private car contrary to sustainable transport policies as set in the National Planning Policy Framework, Policy DM33 (Managing Carbon Emissions: Transport and Energy

Generation) of the Wycombe District Local Plan (adopted August 2019), Buckinghamshire Council Local Transport Plan 4 (adopted April 2016) and the Buckinghamshire Council Highways Development Management Guidance document (adopted July 2018).

Reason 3: The proposed layout would by virtue of its standard of design and layout give rise to a form of development which in the opinion of the Local Planning Authority is therefore contrary to the National Planning Policy Framework, Policy DM33 (Managing Carbon Emissions: Transport and Energy Generation) of the Wycombe District Local Plan (adopted August 2019), Buckinghamshire Council Local Transport Plan 4 (adopted April 2016) and the Buckinghamshire Council Highways Development Management Guidance document (adopted July 2018).

Previous Response (11th August 2023):

The Highway Authority (HA) has provided a number of previous consultation responses in relation to this application, the latest being in a letter dated 5th May 2023 that responded to the information contained within the Transport Assessment Addendum, dated March 2023, submitted by the applicant.

That previous response concluded that a number of issues were still outstanding and these were listed as bullet points at the end of the response. I will repeat those bullet points below for confirmation.

- The updated VISSIM modelling is required so that it can be reviewed by Atkins on behalf of the Council.
- Swept path analysis plans for the internal layout showing the largest vehicles travelling through the site is required.
- The applicant's response to the HA comments on the RSA Designers Response is required.
- A response to the comments made by the Council in relation to the Cycle and Pedestrian Strategy document is required.
- A response to the comments made by the Council in relation to the Sustainable Travel Strategy: Handy Cross Park & Ride Opportunity document is required.
- Further consideration of the parking within the site is required on the basis that the 60% vehicle mode share is not considered to now be realistic due to the Council's position on the reliance of the Handy Cross P&R site.
- Further clarification on the parking accumulation exercise is required.
- The Mode Share Incentive Scheme needs to distinguish between sustainable trips, vehicle trips to off-site locations and vehicle trips to the site.
- Reconsideration of trip distribution for the managed flow scenario to take into account any changes in the modal share targets and provide information to confirm the distribution assumptions.
- Further consideration of the development traffic impact on the wider network base on the need to carry out further detailed assessments of junctions that show greater than a 5% traffic flow impact on any one arm.
- Reconsideration of the impact of the development traffic on the Parkway arm of the A4155 Little Marlow Road/Parkway roundabout junction and appropriate mitigation measures.
- Reconsideration of the standalone assessments of the three identified junctions once the VISSIM modelling review has been finalised by the Council.

Following consideration of the points raised in the previous response the applicant has submitted a Transport Assessment Addendum 2 (TAA2) dated June 2023 and I will provide comments on that information below.

Resurvey and VISSIM Modelling

As mentioned in my previous response, the applicant took the decision to rebuild the VISSIM model provided to them by the Council and in order to do this they carried out new traffic surveys in March 2023 to inform the rebuilt model.

The applicant has provided the Council with the rebuilt base model, which has been subject to review by Atkins on behalf of the Council. The base model has now been confirmed as suitable for use as a reference case against which the proposed development model impact can be compared. Currently the applicant is making amendments to the future year model following a further review by Atkins in order to be in a position where they can test the development traffic impact. The applicant provided the updated model with associated information on 11th August 2023 and Atkins have started to undertake a further review. At this stage I am therefore unable to provide any further comments on the VISSIM modelling at this stage or confirm that it presents an acceptable assessment of network operation with the inclusion of the development.

Sustainable Travel Strategy

Travel Plan

As referred to in the original consultation response from the HA, dated 21st September 2022, a Framework TP, dated May 2022, has been prepared which will be upgraded to a Full TP upon occupation of the Site. Since the submission of the original Framework Travel Plan (FTP) there have been a number of changes to the application. The HA is not currently aware that an updated FTP has been provided which reflects the current proposals. I would be grateful if the applicant could please confirm whether an updated FTP has been prepared and submitted for consideration. Once I have received an up to date FTP I will finalise my comments in this respect.

Public Transport

The applicant has previously set out their proposals for public transport provision in the original TA and TAA. The applicant is still proposing to include a new north-south bus service between High Wycombe and Maidenhead which will connect with the site; however previously there was a suggestion that the site could rely on a number of parking spaces being available at the Handy Cross Park and Ride site, to effectively act as off site parking for the development. A number of discussions relating to this have taken place between the applicant and the Council, which has led to this suggestion being removed from the application proposals.

The applicant has suggested that a new 30-minute interval service with three vehicles will provide quick access between the urban areas and railways stations in High Wycombe and Maidenhead, including the Elizabeth Line. It is proposed that operational times will be centred on employee start/finish times whilst also providing a public service.

The applicant is also proposing an east-west 'hopper' style local bus between Marlow and Bourne End which they state would cover both employee requirements and local movements within the immediate vicinity of the Site. Buses will be used flexibly to provide

local 'staff only' commuter bus services in the 06:00 - 08:45 and 16:15 - 19:05 periods as well as public 'hopper' services. The Councils Passenger Transport section have been asked for up to date comments on the current proposal and I will update the HA's position once the new comments have been received.

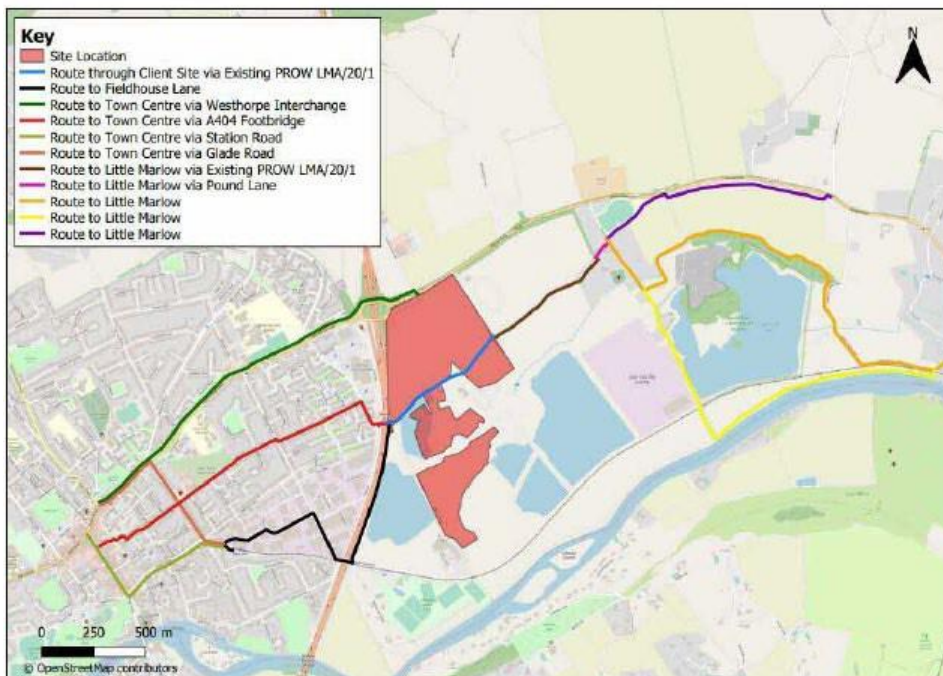
Active Travel – Cycle and Pedestrian Strategy

The HA has previously provided comments on the cycle and pedestrian links to the site, especially with regards to the physical and psychological barrier for pedestrians and cyclists, travelling between the site and Marlow, that is created by the A404.

The HA had also previously highlighted the need for a pedestrian and cycle audit to be carried out in order to demonstrate the suitability of the existing pedestrian and cycle network and identify where improvements are required. In previous responses the HA also highlighted the need for plans to be provided that show any improvements proposed so that the HA can be satisfied that they can be delivered by the applicant on land within either their control or land that forms the adopted public highway.

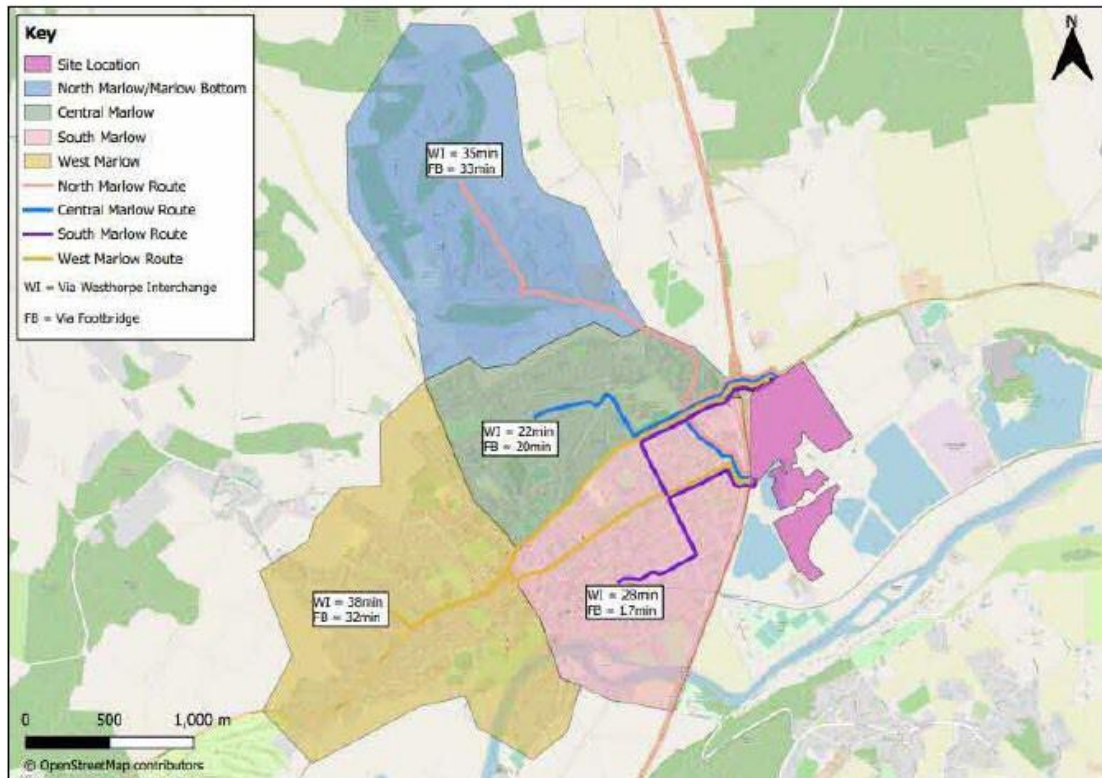
As part of the further investigations into the walking and cycling routes to/from the site, the applicant has considered the main walking and cycling routes into Marlow to the west of the site and towards Little Marlow and Bourne End towards the east of the site. The applicant has advised that an audit of each route has been undertaken in order to identify where improvements are needed. The principal routes that have been identified are included in Figure 4 on page 22 of the TAA2, which I include below for confirmation.

Figure 4: Principal Pedestrian and Cycle Routes Plan



The applicant has considered the walking and cycling journey times from different zones within Marlow and the site via the proposed links to the west of the site. Three main routes

have been identified, the first being from the northern part of the site via the main site access and across the Westhorpe junction and into Marlow. The second is towards the centre of the site and utilises the existing Volvo Footbridge to cross the A404, and the third is to the south of the site via Fieldhouse Lane. Figure 5 in the TAA2 shows the walking time comparisons between the identified routes, which I have included below for confirmation. Figure 5: Pedestrian Journey Times from Marlow via Proposed Access Points

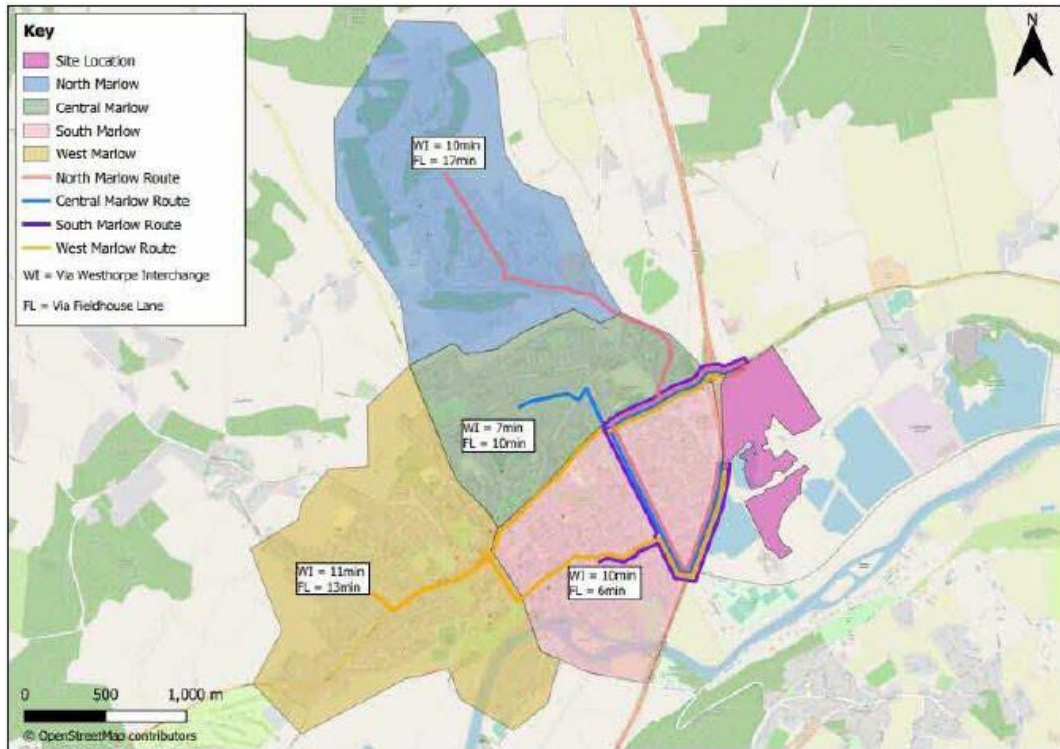


I have reviewed the routes and associated journey times and I have the following points to raise:

- Journey times appear to have been taken from the edge of the site. There is no appreciation of how travelling from different parts of the site to different parts of Marlow would impact on walking/cycling time.
- If a pedestrian was in the north eastern part of the site and wanted to travel to the north of Marlow but the only option to them would be to use the Volvo footbridge or the Fieldhouse Lane link then this would appear to have a detrimental impact on the journey times and is unlikely to be seen as convenient or attractive to sustainable forms of transport.
- If an improved safe and convenient option is not available to pedestrians/cyclists then this may result in them trying to use an option which is not safe (i.e. across the Westhorpe junction without any improvements). This could either result in safety issues or result in people not wanting to use sustainable forms of transport and just using the private car instead.
- It would seem that the route via A4155 and Westhorpe Interchange is always going to be a desire line.

The applicant has also carried out a similar exercise for cyclists, however the route via the Volvo Footbridge has not been included as this is not suitable for cyclists. The information is contained in Figure 6 on page 24 of the TAA, which I include below for information. It should be noted that the title of Figure 6 refers to pedestrian journey times, however it is assumed that this has been written in error and the information actually refers to cycling journey times.

Figure 6: Pedestrian Journey Times from Marlow via Proposed Access Points



I have reviewed the routes and journey times provided and have the following points to raise:

- Similar issues are observed for cycling as highlighted for pedestrians.
- The assessment provided shows that if Fieldhouse Lane was the option for cyclists, then in order to travel from this link to the north of Marlow there would be a 7 minute increase (or roughly a 70% increase) in journey time compared to if the cyclist was to use a route across the Westhorpe junction.
- If someone was looking to travel to the north of Marlow from the north eastern corner of the site via the Fieldhouse Lane link then the difference in time between using either a link via Fieldhouse Lane or the Westhorpe junction would be even greater.
- Currently the route across the Westhorpe junction is not safe or convenient for cyclists and therefore, if no improvements were carried out (i.e. this was not the applicant's chosen route to improve) and cyclists tried to utilise it as a much quicker option then this would unnecessarily increase their chances of conflict with vehicles on what is a very busy part of the network. Either that or they will simply choose to drive rather than use sustainable forms of transport.

The information contained within paragraph 2.30 of the TAA2 suggests that the applicant considers a route via Fieldhouse Lane may present the more attractive and safer route choice for pedestrians and cyclists. The Council does not agree with this position and I shall give further reasoning for this below.

The applicant has reviewed each of the highlighted routes in more detail in paragraph 2.31 onwards in the TAA2 and I will provide comments on information provided for those routes below.

Route to Marlow via Fieldhouse Lane

- This is cited as the applicant's preferred route, however, there has not been any confirmation that this route can actually be delivered due to third party land. The Council is aware that these issues are outstanding and have not yet been resolved and the applicant stated at a recent meeting that they are not able to deliver or rely on this route at this stage but were willing to contribute to its improvement should it become available.
- It is noted that in the event that the route is secured, it would be as a minimum private and accessible only for future employees and users of the site.
- It is noted that on the western side of the route is the A404 and on the eastern side of the route are trees and a lake. The route is therefore isolated and not overlooked. No assessment has been provided of how attractive this route would be when taking this issue into account.
- In darker winter months it is questionable as to how many people would consider this to be a safe and attractive route. No details are provided to show how the applicant intends to deal with this issue, therefore as presented the Council does not consider this route as an appropriate route to provide the main pedestrian/cycle link between the site and Marlow.

Route via Volvo Footbridge

- It is recognised that this route is not suitable for cyclists and it does not allow for safe and convenient access for people who are mobility impaired. There are currently no detailed proposals to show how access for these people is to be achieved via this option.

Route to Marlow Town Centre Via Westhorpe Junction and A4155 Corridor

- A significant concern regarding this route is getting pedestrians and cyclists across the Westhorpe Roundabout in a safe and suitable way.
- It is noted that the applicant states a preliminary design has been drafted of a proposed potential improvement scheme to cater for pedestrians and cyclists crossing the Westhorpe Interchange. It is also noted that the applicant states that the principle of these improvements needs to be discussed with National Highways and Buckinghamshire Council.
- It is stated that the scheme includes the part signalisation of the interchange including controlled pedestrian crossings on the northern slip arms of the junction.

The Council is aware that the pedestrian crossings have now been built into the model and form part of the information that is currently under review by Atkins on behalf of the Council.

- It is also proposed to increase the height of the parapet on the northern circulatory arm to cater for cyclists, however there is concern about the width of footway/cycleway across the junction and whether this is adequate in order to accommodate the pedestrian and cycle movements from the development. A plan containing these improvements has recently been received by the Council and is currently under review.

Concerns remain that the applicant is stating that the route via the Westhorpe Interchange and any improvements to the Volvo footbridge to allow it to cater for cyclists and people with mobility impairments, would be fallback positions should the route via Fieldhouse Lane not be secured. The Council is concerned over the reliance on the Fieldhouse Lane option as the main option and remains of the opinion that all three routes should be improved and available as attractive, safe and convenient options to access the site via sustainable means of transport.

Following a recent meeting on 10th August 2023, the applicant has now confirmed that the principal route for peds/cycles is now proposed to be via improvements to the A4155 route across Westhorpe, with a second pedestrian only route via Volvo footbridge. Given the size of the site and desire lines it seems to the Council that there must be multiple routes available to both pedestrians and cyclists to make this mode of travel an attractive proposition and to meet the aims of the sustainable transport strategy for the site.

I will also now include initial comments on the Pedestrian and Cycle Audit carried out by the applicant, which for confirmation is contained within Appendix C of the TAA2.

Pedestrian and Cycle Audit

Route 1 – Existing Route from Marlow Station to Fieldhouse Lane

- At a meeting on 10th August 2023 the applicant confirmed that they cannot deliver this route as it stands so cannot rely on it for the purposes of the application
- The route has been described, however there are no details on widths of footways, whether they are adequate in order to cater for additional pedestrian movements and how the conditions compare to the requirements of LTN1/20.
- There is a section of footway that passes under the bridge of the A404 and it is noted that this limits pedestrians to single file and may force pedestrians onto the carriageway when passing. This does not appear to be an acceptable situation and while it is stated that the removal of overgrown vegetation may improve the situation there is no detail on what this may improve the width from and to and whether this is an acceptable width when taking into account footway widths cited in Manual for Streets and LTN1/20.
- Part of the highlighted route passes through the Globe Business Park, which is a private development. How is the applicant going to guarantee that pedestrians/cyclists associated with the site can use a route through what is a

- private area that does not form part of the public highway?
- It is stated that signage along the route maybe required to guide pedestrians/cyclists. There is no detail of what signage might be used and where it would be located. It is also not clear how the applicant would provide signage on the private land within the Globe Business Park.
 - It is stated that the applicant is committed to upgrading the section of the route adjacent to the A404 in order that it is suitable for both pedestrian and cyclist use in line with LTN1/20, however no details of these improvements have been provided to allow the Council to Condition them as part of any permission and as it stands the land is not within their control.

Route 2 – Proposed Route through Applicant Site via PROW (LMA/20/1)

- It is recognised that this PROW is not currently suitable to provide a safe and suitable route to the site, therefore improvements are mentioned. However, no plans of these improvements have been provided which would allow the Council to secure them as part of any permission.
- It is noted that the applicant states resurfacing of the existing path and the provision of low level lighting will deliver a secure and safe connection at all times. However the Council has concerns over the attractiveness of what is essentially a PROW, which is not overlooked and is remote from built up areas, as a main link to provide safe and suitable access to the site.

Route 3 – Existing Route to Town Centre via A404 Footbridge

- As with Route 1, a written description of this route is provided, however no widths of any footways or carriageways have been provided to inform the Council on their suitability to be used by pedestrians and cyclists associated with the site.
- Information on widths would allow the applicant/Council to identify areas where improvements need to be considered. This has not currently been provided.
- It is noted that the Volvo footbridge provides a route for pedestrians, however this is not an attractive or convenient route for cyclists or people with mobility impairments. No improvements to address this have been proposed.
- A route has been highlighted that passes adjacent to an allotment which appears to have a high hedge on one side and a high wall on the other. This part of the route is not overlooked and is not likely to be attractive or convenient for pedestrians or cyclists to use, especially in darker winter months.
- It is stated that this is the preferred pedestrian route, however there is insufficient detail provided for this route to allow the Council to reach this position. Given the scale of the development and desire lines and the fact that the Fieldhouse Lane route cannot be delivered or relied on, it means that this route and the Westhorpe Roundabout route have much greater importance and multiple safe and suitable routes should be achieved to ensure that walking and cycling is a realistic and attractive choice.

Route 3 – Alternative routing for cyclists

- Two further routes to avoid the footpath adjacent to the allotments are discussed.
- No details are provided on widths of footpaths that are intended to be part of the cycle route so it is not possible to confirm their appropriateness.
- If the route contains a footpath, are cyclists allowed to use it and if so, is there sufficient width to accommodate the cyclists as well as any pedestrians that may be using it? No details have been provided.
- The alternative routes also highlight a number of roads for cyclists to use. Are conditions along these roads suitable for cyclists, in terms of the environment being as attractive as possible? Are there any improvements that could be made to make drivers more alert to the presence of cyclists? This comment would apply to all other on-carriageway routes currently highlighted for cyclists.

Route 4 – Existing Route to Town Centre via the Westhorpe Interchange

- It is noted that this route does benefit from existing shared walking and cycling facilities along Little Marlow Road (A4155) heading into Marlow, however the applicant suggests that this route is unfavourable due to the need to cross the Westhorpe Interchange.
- The Council considers that the route along Little Marlow Road into the centre of Marlow should be high priority for focussing improvements to aid the movement of pedestrians and cyclists as it provides a useful 'spine road' along a more central alignment through Marlow, which pedestrians and cyclists can use to then travel to the north and south to access different areas of Marlow.
- The applicant is urged to further consider improvements across the Westhorpe Interchange to aid the safe and convenient route of pedestrians and cyclists in order to facilitate the use of this route into Marlow.
- No detail has been provided to highlight any other areas of this route that may need improvements and previous correspondence from the Council has suggested that improvements could be made where the route along the A4155 passes over side road junctions. An image of a LTN1/20 compliant crossing of side road junctions has previously been provided to the applicant; however such improvements are not evident in the submitted information.

It is understood that the applicant is currently preparing a further Audit that considers these routes in further detail and the Council is currently awaiting the submission of this further information for consideration.

Car Parking

It is noted that a managed parking regime will be implemented across the site where most of the vehicles arriving at the site will be pre-registered with spaces pre-booked. It is stated that unauthorised vehicles will be turned away from the site. The Council assumes that the vehicles that are turned away will park locally within Marlow and there is concern that this could cause issues within Marlow and beyond as there is no control over how many vehicles might actually do this.

The applicant has stated that in the event that parking restrictions are required offsite to deal with any issues resulting from the parking of vehicles associated with the Film Studio, a contribution will be made to enable the introduction of parking restrictions. However, it is not clear how the applicant would identify any offsite parking issues and the extent of the area that any additional restrictions would need to cover. The applicant is therefore required to provide more information in relation to areas that would be affected within a reasonable walking and cycling distance of the site and put forward proposals for mitigation measures to give the Council confidence that this would be adequately dealt with should overspill parking occur.

Mode Shift Targets

As detailed in previous responses, and as recognised by the applicant, the mode shift targets that the applicant is aiming towards are ambitious. In order to hit the targets the applicant is going to have to achieve a significant shift away from the private car and towards the use of sustainable forms of transport. One way they are proposing to achieve this is by the footway and cycleway connections that I have detailed above notwithstanding their current limitations. The other ways are through a robust parking strategy within the site and reliable and convenient public transport links and control of parking off site. I have detailed the new bus services that they applicant is proposing, which are currently being considered by the Council's Passenger Transport Section with comments to be provided in due course.

With these measures in place the applicant is aiming to achieve a 16.7% uptake in sustainable transport modes and a 24.2% reduction in the use of private cars and vans. They are also targeting a 7.5% uptake in walking and cycling. The full targets are detailed in Table 2 on page 29 of the TAA2, which I will include below for information.

Table 2: Method of Travel to Work – STS Targets

Mode	Mode Share (%)		Change in Mode Share
Underground, metro, light rail, or tram	0.2%	Public Transport Mode Share 20.0%	+16.7%
Train	4.8%		
Bus, minibus, or coach	15.0%		
Taxi	0.5%		-
Motorcycle, scooter, or van	1.0%		-
Driving a car or van	60.0%		-24.2%
Passenger in a car or van	3.3%		-
Bicycle	7.1%	Active Travel Mode Share 15.1%	+7.5%
On foot	8.0%		
Other method of travel to work	0.1%		-
Total	100.0%		

Mode Share Case Studies

The applicant has provided case studies of what they consider to be schemes in which similar sustainable transport strategies to the proposed Monitor and Manage approach have been

implemented and have been successful, measured by a shift in mode share to increased use of sustainable modes. Comments are provided below on each of the case studies;

Wellcome Genome Campus Development, Cambridgeshire

- In terms of the location of this site, it is further away from more significant residential areas when compared to the MFS site, but it is in close proximity to the existing strategic road network.
- This site comprises scientific uses, residential homes for Campus staff, Hotel and Conference, Genome Discovery and associated land uses including Nursery Care, Sports Centre. Community Facilities and Healthcare.
- The operations on the site are not comparable with the film studio activity, therefore it is difficult to determine whether any success in terms of mode shift to sustainable forms will be replicated at the MFS site.
- It is noted that the site includes high quality cycle parking across the site including a cycle/mobility hub which includes a mixture of short and long term parking as well as cycle maintenance facilities.
- A number of off-site improvements to walking and cycling connections have been referred to, however, apart from the footway/cycleway link to the north of the site along the A1301, it has been difficult to locate these.
- Facilities for cyclists and active travellers, such as changing rooms and showers, are provided for on site.
- Improved cycle connectivity to the local rail station, including signalised (Toucan) crossings on the A505. Other contributions to cycle connectivity improvements have been highlighted.
- The site utilises a dedicated shuttle bus service to the local rail station, with a demand responsive element being referred to, although it is not clear whether this currently operates.
- There is also reference to on-going discussions with nearby business parks to explore opportunities for combined services.
- The site wide Travel Plan seeks to achieve a reduction in single car occupancy vehicle trips to achieve a 40% modal share for Campus workers undertaking external trips.

A table has been included that shows the existing Campus modal share compares to the South Cambridgeshire average.

Table 3: Travel to work modal share comparison – Wellcome Tust Campus

Main Mode of Travel	South Cambridgeshire average	Existing Campus (2017)
Walk	7%	0.9%
Cycle	7%	6.0%
Motorbike /Scooter	1%	0.7%
Train	1%	1.5%
Bus	3%	32.2%
Car Driver Alone	69%	44.2%
Car Share Driver	4%	10.9%
Car Share Passenger	4%	3.4%
Taxi	0%	0.2%
Total	100%	100%

- The table does show that there is much greater bus usage for the site than that shown for the average in south Cambridgeshire. The initiatives to reduce car usage also appear to be working, however the walking and cycling share for the campus is shown to be less than the average for the area.
- The table does not provide confirmation on whether or not the mode share targets set out in the Travel Plan have been achieved.
- As mentioned above, it is difficult to determine whether a different use such as the MFS site would be equally as responsive to similar bus service provision.
- Does the applicant know whether the site is relying on a reduction in car movements in order to mitigate capacity issues on the network that would otherwise result from the development or whether the targets of the Travel Plan are purely to achieve a more sustainable development in line with government policy.

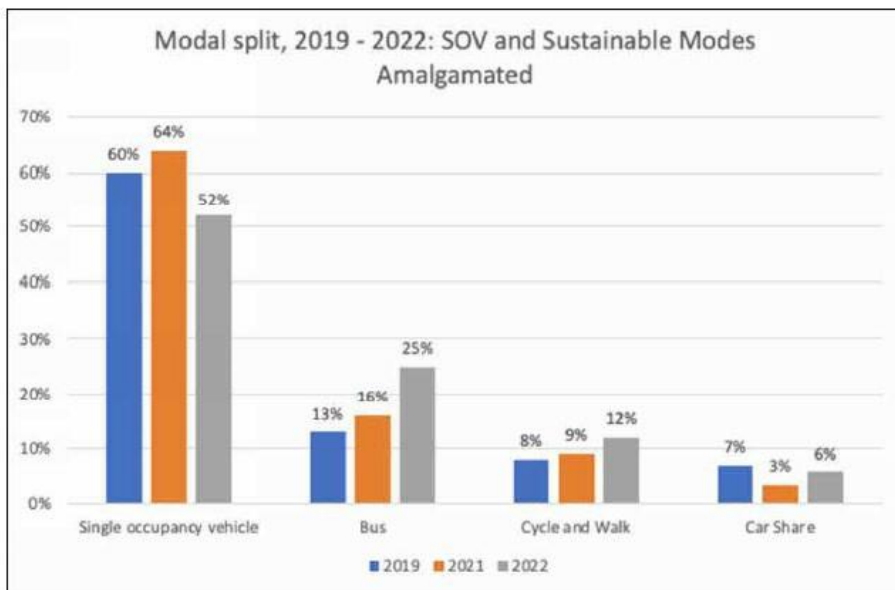
Milton Park, Oxfordshire

- This is described as a mixed use business park located in Oxfordshire, comprising high specification science, technology, office and industrial space, with 250 different employers.
- It is evident that the use of Milton Park is different to the potential use of the MFS site as this appears to be more office based employment that does not require the transport/movement of set equipment or tools, which may be more reliant on vehicle usage.
- The close proximity of the site to the strategic road network is noted.
- It is noted that the site provides frequent bus connections to local areas with cheap use of buses for people travelling from Didcot using any of the Thames Travel and Oxford Bus Company buses.
- It is stated that the site is located on the Science Vale Cycle Network with excellent connections around Oxfordshire, making cycling the mode of choice for a significant proportion of occupiers.
- The MFS site does not benefit from good cycle network connections at the moment, which is not likely to have the same impact as the cycle connections provided for Milton Park. This shows the importance of good cycle links which is why it is vital for them to be provided for the MFS site.

- It is also noted that the Milton Park site does not have a barrier like the A404 for pedestrians and cyclists to cross to access the site from the main residential area of Didcot, which may make walking and cycling a more attractive option for Milton Park when compared to the MFS site where pedestrians and cyclists would have to cross the A404 to access the main residential areas within Marlow.

A table has been provided to show how the sustainable transport measures have impacted on mode share since 2019.

Figure 11: Modal Split (2019 – 2022): SOV and Sustainable Modes Amalgamated – Milton Park



- The table does show that single car occupancy has risen and then fallen, but by only 8% and the use of sustainable forms of transport has risen. However this doesn't really show any long term patterns.
- Due to the difference in usage of this site when compared to the MFS site it is difficult to determine whether such measures would have a similar impact for the MFS site.
- Does the applicant know whether the Milton Park site is relying on the success of the sustainable transport measures to mitigate what would otherwise be an unacceptable impact on the highway network or whether the measures are purely aimed at achieving a sustainable development, consistent with government policy.

Pinewood Studios, Buckinghamshire

- This is another film studio site located in Buckinghamshire so is likely to have uses that are consistent with the proposed uses on the MFS site.
- Key measures of the sustainable transport strategy for the site have been identified as:
 - Internal street designed with appropriate footways and crossing points.
 - 3m wide footway/cycleway improvements on the highway network.
 - Use of pool bikes for employees to use around the site. Free buses

operating Monday to Friday between Pinewood Studios, Uxbridge underground Station, Gerrards Cross Station, West Ruislip and Slough Station.

- Shuttle Buses to and from Uxbridge Station available to staff, production, tenants, visitors and also the local community.
 - Use of pool cars for staff to use for business travel.
 - Guaranteed lift home scheme.
 - Staff travel incentive scheme where staff using sustainable modes are awarded points which can be redeemed on site for exchange for goods or services.
-
- The applicant has referred to the recent approval at Pinewood Studios for the hybrid application (Ref: PL/22/2657/FA) where the Sustainable Transport Strategy included localised footway and cycleway improvements and a pro-rata expansion of the frequent high quality shuttle bus services connecting the studio with nearby rail stations.
 - Reference has been made to the Travel Plan targets where they are looking to achieve 71.3% single occupancy car use by Centre Stage Staff within 5 years (10% reduction on the 2011 Census mode share), a 73% single occupancy car use by staff for the Studio Production floorspace within 5 years (10% reduction from car driver mode share identified by the 2016 Travel Plan surveys). It would appear that these targets are not as great as those proposed at the MFS site and are maybe therefore more realistic.
 - Figures for the use of the shuttle bus services have also been provided which does demonstrate that they are used by a significant number of people but no information provided to show whether this meets intended targets.
 - Information on whether or not the travel plan targets have been achieved is not currently available so it is not possible to determine how successful the measures have been.
 - It is however evident that the Pinewood site does provide significant sustainable transport measures to promote the use of buses and trains to access the site. It also provides footway and cycleway improvements to promote walking and cycling.
 - Pinewood does not have the issue of the A404 providing a significant barrier between the site and the nearest residential areas and the station meaning that walking and cycling from local areas to Pinewood is likely to be a more attractive option as it stands when compared to the situation in Marlow.
 - Does the applicant know whether the Pinewood Studio site is relying on meeting TP targets in order to mitigate an unacceptable traffic impact on the local highway network?
 - Again whilst this information sets out the measures in place and the targets that are intended to be met, it does not provide any evidence of whether the measures have been successful in meeting targets.

Cambourne, Cambridgeshire

- This site is described as a 'free-standing community' of 4250 dwellings, in addition

to education, retail, community and leisure uses.

- In terms of uses within the site, it is evident that they do not really compare to those proposed on the MFS site, therefore travel characteristics are likely to be different and sustainable transport measures are likely to have a different impact.
- While the measures referred to by the applicant do appear to have resulted in a positive shift away from single occupancy car usage to more sustainable forms of travel, the fact that this site is effectively a self-contained community to some extent, means that it may be significantly easier to convince people to use sustainable transport when compared to a standalone employment site with a significant barrier to cross in order to access local residential areas, the town centre and the station.
-
- JP Morgan, Bournemouth
- This site is home to more than 4,000 employees and has evolved into a strategic hub for Operations, Technology, Client Services and Corporate groups with worldwide reach.
- Again, it is evident that the uses on this site are not comparable to the uses at the proposed MFS site, therefore they may not react the same to the sustainable travel measures proposed.
- The applicant has stated that the site has well established facilities and measures at the site to support staff commuter travel.
- A table has been provided that shows the impact of the Travel Plan measures.

Table 5: Travel to work modal share comparison (Staff Surveys & Questionnaires) - Bournemouth

Main Mode of Travel	2002	2017	Change	Cumulative
Public Bus	3%	1%	-2%	+12%
JP Morgan Shuttle Bus	0%	14%	+14%	
Train	1%	1%	0%	
Cycle	4%	12%	+8%	+10%
Walk	7%	9%	+2%	
Car Driver	72%	48%	-24%	-26%
Car Passenger	12%	10%	-2%	
Motorcycle	1%	2%	+1%	+1%
Other	0%	3%	+3%	+3%
Total	100%	100%		

- The table shows that measures to encourage sustainable travel have been successful, however it is unclear whether the objectives that have been set have been met.
- The location of the site is adjacent to substantial residential areas and other facilities within Bournemouth to the south of the site, with no real barrier issues to overcome for cyclists and pedestrians. It would therefore appear to be less of a challenge to attract pedestrians and cyclists from these areas to the site when

compared to the challenges that pedestrians and cyclists currently face at Marlow.

The case studies provided by the applicant do show that providing good quality sustainable transport measures can result in a positive modal shift away from the private car and towards sustainable forms of transport. However, it is not clear whether the measures cited in the examples would have such an impact at the MFS site due to the differences in the uses at the sites and the specific challenges faced at Marlow in terms of walking and cycling connectivity to the site.

The case studies do show that good quality bus services that provide convenient travel to a number of locations do have a positive impact on modal shift. The examples also highlight the importance of excellent pedestrian and cycle links to improve travel to the site by walking and cycling. This also reinforces the Council's position in relation to the walking and cycling improvements at the MFS site, including the provision of a number of routes to allow convenient travel between the site and different areas of Marlow.

There remains concern that the mode share targets proposed by the applicant are still ambitious, which is especially concerning as there is a reliance on these targets in order to mitigate development impacts on the road network and to achieve sufficient parking provision on site.

Further consideration is required when the modelling work currently underway has been finalised and the impacts of the development are fully understood, in order to investigate appropriate mitigation measures should model shift targets not be achieved.

The Council would also like to again point out the requirement for additional information on how the applicant is going to manage the potential for any offsite parking issues on the surrounding highway network as a result of the proposed development. This is an important consideration as if people who are associated with the site drive to the site without the intention, or permission to park on site, are unable to park in the vicinity of the site it will discourage them from driving to the area in the first place and at the same time encourage them to use sustainable forms of travel.

Junction Impact Assessment

Section 4 of the TAA2 looks at the static modelling of three junctions on the network in close proximity to the site. These include the following:

Junction 1: A4155 Little Marlow Road / Parkway Roundabout;

Junction 2: A404 / A4155 'Westhorpe Interchange' Roundabout; and,

Junction 3: A4155 Marlow Road / Pump Lane South / Site Access Crossroads.

Due to the close proximity of these junctions and the coinciding interaction between them, they have all been included in the VISSIM modelling work that is currently under review. I will not therefore provide any further comment on the assessment of these junctions at this stage.

The VISSIM modelling is covered in Section 5 of the TAA2, however as stated near the beginning of this response, the applicant has recently provided the Council with the VISSIM modelling work and associated technical documents that are currently under review by Atkins on behalf of the Council. Further comments will therefore be provided in due course.

Wide Area Network Impact

Following discussions between the applicant, National Highways and the Council, it has been agreed that the applicant carries out detailed junction impact assessments on 11 further junctions on the local highway network. The junctions subject to further assessment are as follows:

A404 Junctions

- M40 Junction 4 - Handy Cross Roundabout
- Bisham Roundabout

Marlow Junctions

- Wiltshire Road
- Newtown Road
- Glade Road
- Dean Street
- High Street

Little Marlow / Bourne End Junctions

- Winchbottom Lane
- Sheepridge Lane
- Blind Lane
- Cores End Road

The applicant has very recently provided a Technical Note to the Council that contains the detailed impact assessments of the development traffic at the junctions listed above and this document is currently under review. Further comments will be provided once the Council's review of this document has been finalised.

Site Layout and Vehicle Tracking

As part of the information included in TAA2, the applicant has provided further details of the internal site layout and the tracking of HGV's through areas of the site. While the Council notes that the internal site is to remain in private ownership, it is still considered that the site layout should be safe and suitable, therefore it is considered appropriate for comments on the layout to be provided. This is supported by paragraph 130 of the NPPF, which states the following:

130. Planning policies and decisions should ensure that developments:
- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
 - d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
 - e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
 - f) 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 users⁴⁹; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Initial comments on the site layout and vehicle tracking provided are as follows:

- Following a review of the internal site layout and the tracking provided it is evident that further clarification on how the internal layout will operate and how vehicles will travel through the site is required.
- It is noted that the site is to remain private, however the LPA wishes to be satisfied that the layout is safe and suitable, and as this is a full application, there needs to be adequate information submitted for consideration to allow this to be determined. At present it is considered that the information lacks sufficient detail.
- It is currently unclear whether all types of vehicles are able to access all parts of the site? This should be clarified on the plans.
- It is unclear what parts of the site are intended to accommodate two-way traffic flows and what parts are intended to be one-way. This should be clarified on the plans.
- There are cul-de-sacs shown in the eastern section of the site that appear to terminate without any turning area for vehicles. How is it intended for vehicles to turn once entering these cul-de-sacs?
- There are a number of 'large access doors' to many of the buildings shown on the Masterplan drawing (01841-WEA-MP-00-DR-A-0200) and it is assumed that materials would be taken into the buildings via these doors. No information has been provided to show how HGV's will service the buildings in terms of where they will stop in order to gain access to these doors.
- The tracking of an HGV exiting the site and onto the new roundabout access junction shows that the vehicles will accommodate much of the carriageway through the bend leading to the roundabout. This has the potential to impact on the ability of other vehicles to utilise the full two lane approach. Has this been taken into account in the VISSIM modelling

- The turn from the main access spine road through the junction to travel down to Westhorpe Park Homes does not look appropriate. What other vehicles are likely to need to utilise this route? If it is intended for a bus to travel this route to the south and into the existing housing area to provide a bus service, has any consideration been given to the appropriateness of this route for buses?
- There is tracking of a number of internal junctions that shows conflict between vehicles. There are comments on the plans to highlight these areas. The layout should be amended so that it better accommodates the movement of HGV's through these junctions.
- There does not appear to be any tracking associated with the western section of the ground floor of the northern car park. This should be provided.
- In the south car park, the ground floor layout appears to show two spaces adjacent to the Car Park Pavilion area, there has been not tracking submitted to show vehicles accessing these spaces. The position of the spaces directly adjacent to the car park wall could make accessing them difficult so tracking should be provided.
- In the same location it is also noted that the Car Park Pavilion doors open out into the car park area, which will have the potential to conflict with cars manoeuvring within the car park. This should be addressed.
- There remains large areas of the site where no tracking of vehicles has been provided, and it is unclear how it is intended for vehicles to use these areas in terms of servicing the site. Further clarification in this respect should be provided.

These points have been discussed with the applicant and it is understood that the applicant is currently preparing a response. Further comments in relation to the internal site layout will therefore follow the receipt of the applicant's response.

It is evident from the contents of this letter that issues relating to traffic impact, car parking, layout, sustainable travel and connectivity and mitigation remain unresolved and outstanding. As such the Highway Authority cannot conclude at this stage that the development is acceptable, well connected with safe and suitable access and would not lead to an unacceptable impact on road safety and network operation. The Highway Authority would welcome the submission of additional information to address the outstanding concerns. However, should the LPA wish to determine this application as submitted then the Highway Authority would recommend refusal of planning permission for reasons that can be advised.

I trust that these comments have been of some assistance.

Transport Assessment Comments:

BC Archaeology:

Thank you for consulting the Buckinghamshire Council Archaeological Service on the above application. 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.

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
0847600000	HER	Marlow Airport/RAF Booker/Wycombe Air Park: Civil airfield used as a military airfield from 1939, now in use for recreational flying.
0847603000	HER	RAF Booker: Site of WWII pillbox, now destroyed.
0847601000	HER	RAF Booker: Site of WWII pillbox, now destroyed.
0116500000	HER	BARMOOR: Thirteenth to nineteenth century records of manor of Barmoor

* 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 welcome the inclusion of the Archaeological Desk-Based Assessment produced by ORION with the application documents. We largely concur with Section 5.5 of this document, which states:

The site has been the subject of a measured survey which recorded evidence of WWII and modern airfield features. If development will result in the removal of these features a watching brief should be maintained to ensure their preservation by record; this could be secured by a suitably worded condition attached to the planning permission

Whilst we welcome the above there may also be currently buried features relating to the operation of the airfield or earlier phases of activity. We would recommend that a condition is attached to any consent which requires a watching brief during the ground works.

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 the following conditions:

No development shall take place, unless authorised by the local planning authority, until the applicant, or their agents or successors in title have submitted and had approved by the planning authority a written scheme of investigation for an archaeological watching brief on the ground works.

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

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

BC Landscape & Urban Design:

- Introduction

The following appraisal draws together my comments from the initial planning submission and is updated where relevant to respond to additional information subsequently submitted in March 2023 for consideration. My original comments and issues remain substantially unchanged.

- Existing Site

The site's history for quarrying and subsequent landfilling is largely confined to memory and the restored landscape comprises lakes, trees/woodlands, scrub, rough grassland, roads and footpaths. While some of the restoration has not been well executed, it is a green and unbuilt landscape with very few remnants of its industrial past. Some areas outside the site have been returned to agricultural use. The open character of much of the site affords some views to the Chilterns AONB to the north and to the wooded slopes of the Thames Valley to the south, both of which in turn overlook the site.

It is my view that the value of the site as a landscape resource is understated by the applicant. Notwithstanding that the site is privately owned, there are public rights of way and permissive footpaths within the site that enable the public enjoyment of the site, its rich wildlife and the views across it to/from the surrounding landscape. The adjacent Chilterns AONB is enjoyed in much the same way.

While the site was in use for quarrying and landfilling, it would have provided separation between the Chiltern hills landscape to the north and the River Thames landscape to the

south. With its restoration, the site and its surroundings are now well integrated into the landscape where lakes, woodlands and grassland provide a natural transition between the Chiltern hills and the River Thames corridor. Both character areas benefit from this continuity, where the mosaic of lakes, woodlands and open space add scale and richness to the spatial and visual experience of the wider landscape. This landscape is also the wider setting to Westhorpe House, a historic building and garden at the centre of the site, and to the residential area of Westhorpe Park.

- Proposed Access

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

- Site Layout

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

The proposed site layout makes an efficient use of the northern part of the site, and reflection of the functional needs of the development, but this density of buildings will emphasise the imposing nature of the proposed development. It is located furthest from views from Winter Hill to the south, but lies adjacent to the Chilterns AONB, immediately north of the A4155, and adjacent to the busy A404. The proposed layout seems to have little consideration for its relationship to the A404, with some of the largest buildings presenting a staggered edge towards the western boundary.

Plot 4 comprises open space surrounded by woodland with a 'culture and skills' building occupying a modest area towards the north of this plot. It is a predominantly green space that will provide for public amenity.

To the south lies Plot 5 which serves as a backlot for outdoor filming. The perimeter will be secured by a bund and fencing along with a dense screen of vegetation. A mixture of

reinforced grass and hard surfacing will occupy the centre. The structures and equipment occupying Plot 5 will come and go, often having a part-built and temporary character. The backlot at Plot 5 will at times be intensively used and is likely to have a strong presence in elevated views from the south such as at Winter Hill, to which the backlot lies relatively close.

The proposed site layout permits the retention of most existing trees and other vegetation, which is generally located at the perimeter of the site, with the exception of the northern site boundary. The proposed development will reinforce and manage these areas. I am concerned that the northern and eastern boundaries do not incorporate sufficiently substantial landscape buffers to secure adequate screening or softening of views of the proposed development from some vantage points. Within the limits of the current layout, I am satisfied that the eastern fringe incorporates as much planting as possible, but the amended site access has significantly weakened the landscape buffer along the northern edge.

- Building Design

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

The proposed Hub building adopts a unique and distinctive form and detailing, with a high degree of transparency. Its location is at the 'back' of the northern site, has a somewhat imposing presence upon the adjacent public footpath and is in close proximity to Westhorpe House and Westhorpe Park. With no meaningful public function or benefit, a more appropriate location elsewhere should be sought.

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

- Public Art

The original proposal for a 'public art tower' has been removed on account of its likely contribution to adverse visual impacts, and illustrative locations and examples of more discrete artworks have been put forward. The broad principles are acceptable, although

wording should be omitted and visibility from the A404 avoided. Artworks in and around the public areas of the site are a key objective.

- Landscape Design

As highlighted in comments above about the site layout, principal soft landscaping within the northern part of the site lies at the perimeters and along the central spine road. I'm broadly satisfied with the quality of hard and soft landscaping suggested in the application, but there are shortcomings in other aspects of the proposed landscaping.

I'm particularly concerned about the amendments to the northern perimeter, to accommodate the site access, where existing trees will be lost and there is insufficient scope to introduce a robust landscape buffer of trees and shrubs for maximum screening. This will leave the rear of workshops and some of the larger buildings within relatively exposed in views from the north. A significantly more substantial landscape buffer is required and the site layout should be adjusted accordingly.

Planting to the eastern boundary has been discussed and amended during the planning application. I am satisfied that within the limitations of the current site layout that the planting here, including climbing 'green walls', has been maximised, but this remains a narrow buffer within the site where screening continues to rely significantly on semi-ornamental conifer trees within neighbouring land.

I note the incorporation of SuDS swales and basins into some of the landscape buffers. In practice, there is usually a conflict between SuDS features and the provision of trees and shrubs for screening. It is also common for swales and SuDS basins to be underprovided on masterplans, their subsequent enlargement leading to increased conflict between SuDS and planting at the detailed design stage, when SuDS usually prevails.

Planting within Plots 4 and 5 will reinforce and supplement native trees and shrubs to achieve a naturalistic landscape setting to the development and provide a degree of screening from the surrounding area. This approach is satisfactory.

- Public Amenity (RUR4 Policy Area)

The RUR4 policy area enjoys a variety of established recreational uses – walking, fishing, nature-watching and water sports, as well as formal sports at the athletics track. These uses are mostly on private land but are also accessible to the public one way or another. It is this established recreational enjoyment of the site and its surrounding landscape that Local Plan Policy RUR4 seeks to capitalise on, even if its formal designation as a Country Park is problematic. With the site's Green Belt status and its intended return to agricultural use following quarrying and landfilling, its contribution to the area's open countryside is entirely reasonable.

The proposed development is likely to conflict with some of these recreational uses. In particular it will urbanise the landscape and views from the public footpath, diminishing the enjoyment of walking this route. New buildings will appear as a backdrop to some of the lakes that currently enjoy a wooded setting. The jet-ski lake lies relatively close to the backlot, where the noise it generates may come into conflict with filming on the backlot.

The landscape design submitted proposes enhancements to the public footpath running west to east between Plots 1-3 and 4 and through the wider RUR4 policy area. It is acknowledged that the existing landscape experience of this route is variable, attractively informal and semi-natural in part, but also having poor surfacing and fencing in other places that are remnants of the site's industrial history.

The proposed landscape enhancements will upgrade the quality of the footpath where it passes through the development site, but in doing so will also take away the informal and somewhat semi-rural character of this route, instead creating a more ornamental and suburban landscape setting to the proposed buildings. Along with the loss of views to the countryside north of the site, this will be a significant and adverse change to the character of this footpath.

A series of workshops will line the northern side of this footpath, with the proposed Hub building, car park and sound stage framing both sides of the footpath at the eastern side of the site. The landscape setting and material change to this footpath will be significantly urbanised by the proposed development, diminishing its appeal as a recreational route through the countryside.

- Impacts upon Landscape Character

The main text addendum says little about the potential/likely landscape and visual effects arising from changes to the scheme. Given the loss of trees at the northern site boundary, changes to the eastern boundary planting and the changes to the proposed public art, a summary of the likely consequences for LVIA would be expected in the main text.

While the Applicant's LVIA identifies significant adverse visual effects likely to arise from the proposed development, I don't agree with some of the detail contained in the LVIA and am of the view that in some instances the landscape and visual effects will be greater and more significant than stated in the LVIA.

The nationally designated Chilterns AONB lies immediately north of the site, with the site itself within an area currently being assessed for inclusion in the expanded AONB. The Wycombe District Local Plan (2019) sets out its AONB policy CP10 and DM30, seeking the conservation and enhancement of the AONB's landscape character and visual amenity, and the avoidance of significant harm to the AONB from development within its setting. The proposed development, by way of its predominantly functional form, density, scale and character, does not satisfy either of these policies. I concur with much of the detail and

conclusions set out by the Chilterns Conservation Board in their consultation response, where this proposed development in the immediate setting of the AONB will cause significant harm to the AONB's landscape character and visual amenity.

The site lies at the northern edge of the River Thames Corridor, where the Royal Borough of Windsor and Maidenhead Local Plan 2013-2033 seeks to conserve and enhance the special character and visual amenity of the River Thames and its setting under its policy QP4. Views extend northwards across the site to the Chilterns AONB from various parts of the River Thames corridor, especially elevated locations with panoramic views such as Winter Hill and parts of the Chiltern Way (southern loop). The return views from the Chilterns AONB and the Thames Valley Floodplain extend to the scarp slope south of the river, including Winter Hill, which is distinctive and provides significant framing and enclosure to the Thames Valley landscape. Again, on account of its predominantly functional form, density, scale and character, the proposed development does not satisfy policy QP4 and is a significant detractor from these views to, from and across the river corridor.

The published Landscape Character Assessments for the site and its surroundings draw attention to the important visual relationship between the site, within LCA 26.1 Thames Floodplain, the AONB to the north, including LCA 21.1 Thames Valley Slope, and the LCAs of Winter Hill, Cookham Dean and Cookham Rise to the south in neighbouring RBWM. The Applicant's LVIA considers landscape sensitivities to be highest to the south in RBWM, outside the Chilterns AONB, which doesn't make sense given the AONB's comparable status to a National Park. It is my view that the LVIA goes on to underplay the effects of the proposed development upon landscape character in some instances e.g. minor adverse effects upon the Thames Floodplain, within which the site sits. Given the profound change to the character of the northern half of the site in particular, and the perception of this change from the surrounding areas, I cannot agree that this will be a minor adverse effect.

- Impacts upon Visual Amenities

The applicant's assessment of key views and the anticipated impacts upon them from the proposed development indicates the scale of development and the magnitude of change to landscape character and selected views within this landscape.

Where the existing urban area of Marlow is tightly contained by the A404, the proposed development will break away from this and extend significantly eastward into the neighbouring countryside. For example, photomontage Views 3, 8, 9, L, Q and S illustrate this clearly. While the existing Marlow International and Globe Business Parks have a small presence in this landscape, mostly at close quarters, these views demonstrate a major expansion of commercial development into the countryside. This intrudes upon or obscures views between the Thames Valley and Chilterns AONB and breaks the continuity of the open rural landscape between them.

Photomontage View 3 illustrates the likely magnitude of change as experienced from the AONB to the northeast. The view encompasses Marlow town nestling in amongst trees centre and right, with the edge of Globe business park partially visible at the centre. The A404 can be seen extending into the distance left of centre, while Westhorpe House lies towards the left amongst the trees. The wireline photomontage indicates the extent of the proposed development and the fully rendered photomontage illustrates the scale, density and character of buildings that will be visible from here. This is a major change to the character of this view where the proposed development interrupts the flow of the landscape from the Chiltern hills into the Thames Valley and strongly urbanises the middle ground.

Photomontage View 8 in the LVIA illustrates a wide panorama which reduces the site to a small part of the image towards the centre. It is a wide-ranging view, but the existing site is perceived as much closer and more clearly visible than Photomontage View 8 would suggest. Appendix A to this response illustrates the LVIA and DAS images compared to a photograph broadly compliant with the Landscape Institute's technical guidance for reproduction at A3.

Nonetheless, considering the images provided in the DAS Addendum, the existing view extends across the fields between the river and the site, taking in a glimpse of Westhorpe House at the centre, with Plots 4 and 5 to the left and Plots 1-3 behind it. The A404 extends to the horizon also at the centre, while Marlow is clearly visible to the left beyond the lake and hotel. The white tents in the foreground are the family camping area associated with Westhorpe Farm / Westhorpe Water Sports Club, which operates at the lakes to the right.

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

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

It is my understanding that the A404 typically carries in excess of 100,000 vehicles a day. Both northbound and southbound approaches have limited views of Marlow town in the

vicinity of the site as it lies on the 'inside' of the bend in the road, often screened by intervening trees. However, the same travellers directly overlook the proposed development site in both directions, it being on the 'outside' of the bend with parts of the site directly in front of the drivers on their approach.

Travelling southbound on the A404, the tree-lined vista opens up to extend across the existing site, filtered by the perimeter poplar trees, to the Thames Valley slopes in the vicinity of Winter Hill. Travellers then pass the site with filtered / intermittent views continuing across the floodplain towards the river and Cookham. The proposed development will remove many of the poplar trees from this view and buildings will obscure views of/across the Thames Valley. Photomontage Views B, C and D indicate the degree and character of change that might be expected for road users on the southbound approach.

Northbound travellers experience intermittent views across the Thames Valley to their left, while a tree-lined vista along the road ahead extends directly across the site to the Chilterns AONB beyond. These views across the site broaden and become filtered / intermittent as the viewer passes the site, before becoming enclosed by the road junction and trees and continuing northwards. Approaching and passing the site, the proposed development will substantially intrude upon or obscure views of the Chilterns AONB on this northbound approach. There is no photomontage representing this view; however, Photomontage View L, taken from the pedestrian bridge crossing the A404, illustrates the scale and character of proposed buildings fronting the road on this northbound approach.

Notwithstanding the low sensitivity that might be attributed to road users in general, the experience of an attractive and changing landscape is an important one in terms of local identity for residents and visitors alike; it also helps relieve the monotony of driving. Some of the larger buildings within the proposed development will lie broadly in front of the drivers in both directions and will result in a very evident and harmful change to views of the landscape as experienced by a very large number of motorists and passengers.

The principal right-of-way affected by the proposed development crosses the A404 at Marlow and runs west to east through the site (refs MAW16/2 and LMA/20/1). This is a very popular walking route linking Marlow to Little Marlow, and connects with other permissive routes within/adjoining the site. The LVIA and supporting photomontages demonstrate a profound change to the environment of this footpath where it passes through the site. There will be a major loss of openness and views from the footpath, with a change of character from open rural landscape to a much more enclosed and urban landscape. 'Improvements' to this right of way include surfacing and lighting that are likely to improve accessibility but ultimately diminish any sense of its existing rural character. Figures 6.96 and 6.109 of the Design and Access Statement along with Photomontage Views 11, 12, 14 and 15 all make this abundantly clear.

Such change to the user's experience of the existing landscape is considered a major harmful effect. The applicant suggests this is part of a positive contribution to the RUR4 outdoor recreation objective of a Country Park, but is in fact the opposite. The existing open green landscape experience and visual amenity associated with this part of the route will be

lost, with a major harmful effect as a result. There is also cumulative effect with the neighbouring sports ground which, while retaining a substantially open character, displays elements of an urbanised landscape by way of the sports centre building, athletics track and lighting.

A note on the submitted photomontages: these have been problematic due to the variety of viewing angles, printing sizes and lack of image detail in some instances. It is my view that those images do not accord with the Landscape Institute's current technical guidance. It also makes it difficult for any observer to compare views on a like-for-like basis. Upon request, the applicant provided a printed high-resolution set of photomontages to aid the Council's appraisal of visual impacts upon key/representative views. Other observers will not have had the benefit of these images. Where wide panoramas had been submitted, single-frame images were also requested suitable for printing on A3 in accordance with current Landscape Institute technical guidance. While a set of such images were submitted as additional information, at least some of these remain as wide-angle views and not in accordance with Landscape Institute technical guidance. Most notable amongst these is the key view from Winter Hill, which is illustrated at Appendix A to this response.

- Impacts upon Green Belt

Green Belt is not a landscape designation but shares some common elements with landscape character. Openness is key, as is the broad absence of built development. The proposed development will have a profound impact upon the openness of the site, particularly the northern part of the site which will be substantially occupied by large buildings instead of open grassland. Its proximity adjacent to the A404 and Marlow town will be perceived as the sprawl of Marlow and encroachment into the adjacent countryside.

- Conclusion

I cannot support this planning application on account of its significant adverse impacts upon landscape character, visual amenity and recreational amenity. While the quality of the proposed architecture and hard/soft landscape is evidently high, the location of the proposed development is a fundamental problem. It will be a very large, dense and imposing development in a sensitive landscape location, and will be of significant harm to the landscape character and visual amenity of the Chilterns AONB, Thames Valley and the public recreational use of this part of the RUR4 policy area. Mitigation measures incorporated into the design can do very little to change this, as the function, layout and scale of this type of development evidently has very limited scope for flexibility. The proposed development will not be successfully integrated into the landscape. The existing openness of the site is an essential feature of the landscape, providing continuity of views and a sympathetic transition of character from the Chilterns AONB into the Thames Valley landscape, which also reinforces the essential openness of its function as Green Belt. The

principle of landscape mitigation by softening/screening with trees and other vegetation at the edges does not compensate for this, as it creates or reinforces enclosure that obstructs the essential visual relationship between public routes/spaces and the surrounding countryside. The creation of high quality landscape spaces and 'enhancements' to public rights of way are commendable but ultimately urbanising features that change the fundamental character of countryside amenity that is currently enjoyed by members of the public, and which remains a key objective for public recreational use in this location.

Appendix A

Photomontage View 8 as presented in the LVIA and DAS Addendum, compared to single frame view broadly compliant with LI Technical Guidance for Type 4 Visualisations.

View 8 existing

8 frame stitched view | FOV 140 x 50 degrees | Camera height above survey point 1650mm | Nominal lens rise 0mm | Date 10.02.22 | Time 14:44



LVIA Photography (140 horizontal angle of view on A3 page (with note to print at A1))



Viewpoint 8 full baseline - cropped to standard frame

30

Panorama Views | 10

Marlow Film Studio | Landscape Design Update

DAS

Addendum photography (approximately 65 degree horizontal angle of view on an A3 page)



Single frame photograph at same location (approximately 39.6 degrees horizontal angle of view), which is broadly compliant with LI Technical Guidance Note 06/19 for reproduction of Type 4 visualisations at A3.

BC Trees:

Recommendations.

No objection in principle.

Comments

Site layout has been revised to include a new roundabout to access the site from the Marlow Road

The revised internal site layout comprises of access road with various units and studios including workshops. The Roof level GA plan appears to be for the majority of the units covered with solar panels.

The applicant has provided a copy of the canopy cover calculator which is helpful. Amended canopy cover assessment including plan P20514-00-003-GIL-0101 Rev 09 as provided with the total canopy cover area for the site has been calculated as 96,078m² and the total of 27% and above the baseline 25% in line with the policy requirement DM 34. This is comprised of 12% existing trees, 10% proposed new trees and 4% green infrastructure elements including biodiverse roofs to soundstages and green walls.

Referring to the Tree canopy cover plan P20514-00-003-GIL-0101 Rev. 09 and arboricultural Impact assessment Tree losses will occur for the proposed new roundabout and part of the frontage with the Marlow Road along the top access with the removal of G10 Sycamore, G9 and part of G14 Lombardy poplars T45 to T47 comprising of 2 sycamore and a Goat willow which.

This element would have a significant impact to views in and out of the site. Therefore, any mitigation and replacement planting where required will need to be to provide good visual amenity enhance the overall visual appearance in that area which will be seen from the public realm.

The existing diagonal section of the access road would see the loss G8 wild Cherry, T42 – T44 2 walnut and tree of heaven, T38- T40 3x ash, T32-T36 1x Lombardy poplar 3 ash and 1 walnut, T30-T31 ash, G7 ash, T27-T28 Wild cherry, T16-T18 2x ash 1x horse chestnut and T20 beech.

T31 ash is shown to be retained in the canopy calculator? And also on the Tree protection plan 18037-102-WIE-ZZ-XX-DR-V-77-006 rev 02 (sheet 2 of 3)

Further losses are with the studio block T48 -T50 sycamore G15 sycamore. (Backlot 310 311 Site Block plan MFS-PP-MP-LP-0002 revP060) Area along the ditch from east to west T57 hybrid black poplar, G21 Sycamore, hawthorn, part G22 sycamore, hawthorn, part G24 elder, elm, G25 hawthorn and including access to the south adjoining Westhrope House G18 sycamore, Ww2 oak and ash G19 sycamore, oak, crack willow and alder. Boundary with A404 to the west of the site T79 ash.

Eastern Boundary with Westhrope Road along the boundary is shown for removal on the Tree Protection plan 18037-102-WIE-ZZ-XX-DR-V-77-006 rev 02 (sheet 3 of 3) T4, 8 and T9 horse chestnut T5 and T11 ash, G3 Common Hawthorn, English elm and Blackthorn
Also noted hedge H1 will be remove (no detail provided)

Referring to the roof plan and the GI element that equates to 4% of the 27% total and if this can't be delivered than the risk is that it falls below the baseline and would be contrary to policy DM34. Defer to the ecology team for addition comments in regards if there is compatibility between a green roof and the installation of solar panels as this may be in conflict against what remains as a usable green roof.

Green infrastructure is made up Green Wall GI1 GI2, GI4 & GI5 as plants on wall 0.3m³ in irrigated growing medium per 3m² while GI3 is for green roof extensive plus SuDs 6 to 15 cm growing medium combined GI total shown at 4%.

New planting is in the form of native trees with Hawthorn, Hornbeam, Whitebeam, Bird Cherry, and some lesser amounts with elm cultivars, beech and an oak. In addition, there is also scope for a wider selection of other native species such Alder, Crab apple, Field maple, Downey & Silver birch, Goat willow, Spindle, Scots pine, Hazel, Holly, Lime, Rowan, Pear, Native black poplar, Wild cherry, Yew, Wild service tree and also non-natives that naturalise or even some exotics which current work in our landscapes.

Conditions:

1. Revised AIA AMS with tree protection plan if approved
2. landscape condition as to replacement and new trees that complies or improves with the Canopy cover calculator. Resubmit the calculator when scheme is ready to demonstrate that any changes of species is taken int account
3. Full details as to the green walls. (Eco)

Conditions recommended in relation to Arboricultural Impact and Method Statement, planting and green wall details.

BC Ecology:

SUMMARY

It is now considered that the proposals will be able to adequately avoid, compensate, mitigate and provide enhancements for ecology. The details for how this can happen are understood sufficiently to enable the detail to be secured by conditions and through a s106.

COMMENTS

The planning application has potentially multiple ecological implications and as a result a large number of documents have had to be submitted to address these issues.

I have categorised issues to aid the structure and understanding of my comments.

- Habitats, Biodiversity Net Gain and metrics

- Species
- Ecological aspects of the new design
- Mitigation, compensation and enhancement.

Habitats

The 'UK Habitat Classification Report' which was produced in June 2023 is an update of previously produced habitat assessments of the site. The latest version contains a more detailed and evidenced based explanation of the habitats present on site. Species lists and photographs are included of the areas assessed and details of transects taken in plot 1 during September 2022 and June 2023 are included.

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

To classify an area as OMHPDL there is a requirement for certain criteria to be met which are defined in the JNCC UK Biodiversity Action Plan (BAP) habitat description. The UK Habitat Classification Report considers each of the five criteria in relation to plots 4 and 5. Some of the criteria are clearly met for these plots and the meeting of some of the criteria is more debatable. The report claims that the areas are not OMHPDL, primarily on the basis of a lack of bare ground. However, it also questions how well it meets requirements for spatial variation, size and edaphic (relating to soil) conditions.

I agree that the amount of bare ground is limited or lacking in some areas, but they do exist as a result of rabbit activity in some areas and as a result of left over areas of concrete surfacing in others. Therefore, I do consider that there are areas in plot 4 and 5 which meet the bare criteria, but they are not incorporated into the mosaic sufficiently to enable the categorisation of the whole of these areas area as OMHPDL.

The meeting of the majority of the criteria for much of the areas of plots 4 and 5 is important. It points the direction of the way these areas should be used and managed into the future and how this could lead to areas of them being more definitively OMHPDL.

Plot 1 has been subject to the most detailed investigations through repeated transect surveying. It has been to a large extent determined to be 'Other Neutral Grassland', however, this assessment does not reflect the presence of some degree of mosaic features and the fact that it is not a clear and easy fit with 'Other Neutral Grassland'. Large areas of plot 1 are dominated by species other than grasses and also do not fit with the Ruderal/Ephemeral type of habitat. Plot 1 includes small patches of bare ground and also some wet areas.

The significance of the categorisation of habitats as OMHPDL or otherwise, is important for a couple of reasons:

- The fact that OMHPDL is a priority habitat means that Wycombe District planning policy DM13 places additional tests which need to be met if it is to be destroyed.

- OMHPDL has high distinctiveness in the metric and therefore requires greater and more specific compensation.
- The habitats which are created to compensated for loss need to be designed to replicate what is lost to the best possible degree.

Therefore, categorising habitats as something other than OMHPDL makes it easier for the proposals to be acceptable from an ecological perspective.

The difficulty in pinning down habitats has also been particularly difficult with regards to the Westhorpe watercourse which runs across the site from the Newt ditch. The difficulty in classifying this is related to the fact that it has been heavily modified and so that it has features of a watercourse but also has features more closely associated with a standing water body.

Both perspectives are relevant and so in the absence of the ability to reach a consensus the applicant has been encouraged to, and has put forward mitigation, compensation and enhancement measures which address both perspectives. Details which have been put forward to date are aimed at addressing the impact of the construction of a crossing between plot 4 and plot 5. Proposals seek to both mitigate the impacts and also compensate them through enhancements which have value from a river perspective and the perspective of an area of standing water.

The value of habitats, hedgerows and water courses has been valued using the Defra metric 3 (in line with Defra guidance).

The latest version submitted (04/08/2023) records the overall number of baseline habitat units as 199.68 and the overall number of baseline hedgerow units as 11.48.

The proposals will see the number of on site habitat units fall to 173.72 (net loss of -13%) and hedgerow units increase to 11.77 (net gain of 2.56%).

An offset site has been acquired quite close to the site which has been assessed to have a baseline value of 43.33 habitat units and 0 hedgerow units. The suggestion is to increase the habitat units of the offset site to 182.04 units and increase the hedgerow units to 3.03 units.

With the offset site the total biodiversity net gain of habitat units would be 112.75 (56.47%) and a net gain in hedgerow units of 3.32 (28.94%).

Given that some of the baseline information might be considered to be pessimistic and some of the proposed number of units to be created (both on and off site) could be considered to be optimistic. It is useful to consider what the impact might be of making changes to the metric.

- If 7.02 ha of the baseline was OMHPDL in moderate condition instead of Other Neutral Grassland in poor condition. That area would be valued at 84.2 units rather than 28.07 units. A change of 56.13 units.
- If the 4.0083 ha of proposed extensive green roof were only able to achieve Moderate condition rather than Good condition. This would equate to a reduction of 6 units.
- If the offsite area of Other neutral grassland was only able to achieve moderate rather than good condition, it would achieve approximately 37 units.

If all of these changes are put together then there would be a reduction in the net gain by 99.13 units. This would mean that there could still be an overall biodiversity net gain, but it would not reach the proposed level.

The Preliminary Ecological Design Strategy (Draft) considers 6 different scenarios (Current and A-E) relating to the different classification of the baseline habitats in plots 4 and 5 and the creation of different habitats on the offset site. The scenarios are interesting to consider, but they are quite selective. It would have been just as possible to shuffle the elements presented in the scenarios to achieve less positive outcomes.

Ultimately, I think it is very possible that the level of net gain suggested would not be achieved if the developer does not take the management and monitoring of all retained, enhanced and created habitats very seriously. However, I consider that through careful detailed design of the proposals it can be possible to achieve a net gain of greater than 20%.

The Preliminary Ecological Design Strategy (Draft) also reflects on the ability to create the extent of net gain shown in the metric and the conversations held over likelihood of different scenarios. The fact that strategy takes an optimistic view of what can be achieved is good, if this is ultimately reflected in the outcomes achieved. It is however accepted that the preliminary draft is just a proof of principle, and the final direction of travel will be set through an Ecological Design Strategy (EDS) and Habitat Management and Monitoring Plan (HMMP).

An issue which was discussed early on in the proposals was that of how new trees are assessed in the metric. On the whole new trees need to be included as a small size (per the tree helper tool) and as poor condition as it is very difficult for them to be anything else. Rather than showing proposed trees in a suitable way, they have been removed entirely from the metric.

Trees have a wide range of benefits and have been included in the design for the site and therefore it is appropriate for them to be included in the designs for both on and off site and included in the metric in an appropriate way.

The Preliminary Ecological Design Strategy (Draft), The Westhorpe Watercourse: Biodiversity Net Gain Feasibility Assessment and the four different copies of metric 4 set out different scenarios for addressing the impacts upon the Westhorpe watercourse crossing. These include onsite measures in the form of reprofiling and increasing marginal vegetation adjacent to the crossing and the proposed bridge spans. They also include off site enhancements on a section of heavily shaded watercourse on the offset site adjacent to council owned land.

The suggestions are not detailed at this point, but they are shown in the metric that they would have the potential to ensure that there can be a biodiversity net gain on the river metric of up to 0.237 river units (81.72%).

Suggested enhancements in the Preliminary Ecological Design Strategy (Draft) also look to address the requirements of the Environment Agency for enhancements to Westhorpe Lake floating rafts on the edge of the Lake.

The enhancements proposed will not only benefit wildlife but will probably also have a positive impact upon the amenity/landscape value of these locations which ties in with wider objectives.

Species

Issues relating to the way in which notable, protected and priority species have been surveyed assessed have been covered in previous iterations of comments and have been addressed through additional surveying or through clarifications.

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

Enhancements to some of the areas on site should help benefit reptiles and may benefit other species.

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

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

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

RECOMMENDATIONS

The potential of the development site and the offset site to achieve a significant biodiversity net gain has been proven to my satisfaction. However, it is by no means guaranteed. The conditions and s106 which will be required, and adherence to them, will dictate the success of the scheme from a BNG perspective.

The loss of features on site which are akin to OMHPDL is to be partially compensated for through the enhancement of some less distinctive habitats to create OMHPDL. However, I do not consider that this is the full compensation that would be required by tests in policy DM13 and therefore, OMHPDL features will need to be included on the offset site to meet the policy requirement.

There is a need for clear and detailed ecological design information to cover both the onsite habitats and those to be created offsite. The offsite habitats can consist primarily of other neutral grassland as has been suggested, but they also need to take into account the mosaic nature of the habitats to be lost. The habitat to be created offsite needs to include a variety of vegetation types including clumps of trees, scrub and wetter areas, it could also include some slight amendments to the localised topography to create temperature differences (as some surfaces are warmed by the sun more than others) and also create areas of bare ground and potential hibernacula features.

Together these areas can form an informal mix of OMHPDL type features and more parkland type features which would tie the previous historic landscape of Westhorpe House and the new use partially contributing to a SANG together with a more ecologically interesting mix of habitats.

The proposed hedgerows on the offset site can ensure that there will be a net gain in hedgerow units of greater than 20%, however the proposed arrangement of hedgerows

will need to be designed to maximise their connective benefits and also ensure that landscape benefits are also maximised. The current suggested locations would block views from the path across the area used for biodiversity offsetting and also to the hills to the north. This will need to be amended in the final design.

New trees should be included in the design of both on and off-site areas and can be included in the metric. They will however need to be shown as small and almost certainly of poor condition, given the limitation of their potential to achieve anything more within 30 years.

The impacts the proposals will have upon the Westhorpe watercourse from a BNG perspective are considered to be sufficiently compensated for in the scenario where both on and off site enhancements would occur.

Although it is considered that policy DM15 can apply to this crossing, it is accepted that, given:

- the relatively short length of culverts,
- the use of several sections of box culvert to minimise the impact on movement of water and wildlife,
- the use of other ecological compensation and enhancement measures associated with the satisfaction of biodiversity net gain for the river metric,
- the fact that the policy would not have had this sort of scenario in mind when it was developed,

it would not be appropriate for this policy to form a reason for objecting to the proposal. It will however be necessary for the final design to have minimisation of ecological impact and maximisation of value as a core objective.

The design of both on and off site habitats and features will need to be comprehensive and detailed to ensure that species which are currently found on site do not lose out as a result of the development. The off site area needs to accommodate good ground nesting for skylark, the right conditions to enable foraging for barn owl and bats, habitats for small mammals and reptiles and nesting birds. On site the green roofs need to include plant species which accommodate a range of invertebrates, including those currently found on site. The green walls can also accommodate bird and bat boxes and insect hotel features to increase their diversity.

Reptiles can be accommodated particularly well in the areas which will be enhanced OMHPDL.

A Construction Environmental Management Plan (Biodiversity) will be required to address ecological mitigation measures during the construction phase of the development.

An Ecological Mitigation Management Plan will be required to set out mitigation measures which will be required through the ongoing use of the site, such as lighting, use of the back lot and use of other areas where the successful provision of biodiversity units would be threatened by other uses of an area.

Alongside the submission of the finalised proposals for the on and off site habitats (by condition) there will be a need for a submission of a complete and final biodiversity metric (Defra 3) which includes the habitat, hedgerow and river aspects of the metric.

S106 AGREEMENT

A s106 agreement will need to secure:

- the whole of the offsite area shown on 'Figure 2: Off-Site Proposed Enhancements' (WIE18037-127_GIS_17TN_3A) for Biodiversity Net Gain for this application for a minimum of 30 years or longer to provide for the
- maximising the Biodiversity Net Gain delivered on the off set site and securing a minimum of 20% net gain of habitat, hedgerow and river units.
- areas to be managed to compensate for loss and provide a net gain in ground nesting bird (skylark in particular) habitat.
- a Habitat Management and Monitoring Plan (HMMP) which will include the provision of reports to cover the 30 years
- payment to the council to review the monitoring reports keep and return records to government and undertake occasional site visits.
- The submission of an updated Defra metric, to coincide with the submission of updated details proposals.

Legal have suitable BNG template wording which covers much of this.

CONDITIONS

Ecological Design Strategy

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

The EDS shall include the following.

- a) Purpose and conservation objectives for the proposed works linked to requirements for identified species and for Biodiversity Net Gain Calculations.
- b) Review of site potential and constraints.
- c) Detailed designs and/or working method(s) to achieve stated objectives.
- d) Extent and location/area of proposed works on appropriate scale maps and plans.
- e) Specification and source of materials (plants and otherwise) to be used where appropriate, e.g. native species of local provenance.
- f) Timetable for implementation demonstrating that works are aligned with the proposed phasing of development.
- g) Persons responsible for implementing the works.
- h) Details of initial aftercare and long-term maintenance.
- i) Details for monitoring and remedial measures.
- j) Details for disposal of any wastes arising from works.
- k) Retention and protection of existing habitats during construction.
- l) Habitat removal and reinstatement.
- m) Provision for wildlife corridors, linear features and habitat connectivity.

- n) Woodland, tree, hedgerow, shrub, wetland and wildflower planting and establishment.
- o) Proposed new landforms associated with habitat creation.
- p) Soil handling, movement and management.
- q) Creation, restoration and enhancement of semi-natural habitats.
- r) Species rescue and translocation, for reptiles.
- s) Plans designs and specifications for a floating raft system (FloraFloat® system, or equivalent)
 - to be included on Westhorpe Lake showing a minimum of 5 rafts, each of which is 10 metres long.
- t) Plans designs and specifications of the ecological elements of the green roof and green wall, including species to be included (responding to the needs of invertebrates recorded on site) and any additional ecological features included within them.
- u) Ecological aspects of the design of the crossing of Westhorpe watercourse.
- v) Plans, and specifications for new wildlife features, including bat roosts structures, bird nesting features within buildings, reptile hibernacula, an artificial otter holt, barn owl boxes and insect hotels.
- w) Provision and control of access and environmental interpretation facilities, e.g. bird hides, paths, fences, bridges, stiles, gates and signs/information boards.

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

Reason:

To ensure that habitats and ecological features which are appropriately designed, created and installed in accordance with expectations and to ensure that identified protected, priority and notable species are adequately catered for, in accordance with policy DM13, DM34 and the NPPF.

Landscape and ecological management plans (LEMPs)

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

- i) Description and evaluation of features to be managed.
- ii) Ecological trends and constraints on site that might influence management.

- iii) Aims and objectives of management.
- iv) Appropriate management options for achieving aims and objectives.
- v) Prescriptions for management actions.
- vi) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).
- vii) Details of the body or organisation responsible for implementation of the plan.
- viii) 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 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 within the approved development and to provide a reliable process for implementation and aftercare.

Construction Environmental Management Plans (Biodiversity)

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

- a) Risk assessment of potentially damaging construction activities.
- b) Identification of "biodiversity protection zones".
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (this must include Reasonable Avoidance Measures Method Statement (RAMMS)) on protected species.
- d) The location and timing of sensitive works to avoid harm to biodiversity features.
- e) The times during construction when specialist ecologists need to be present on site to oversee works.
- f) Responsible persons and lines of communication.
- g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.

- h) Use of protective fences, exclusion barriers and warning signs.

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

Reason:

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

Lighting

Prior to commencement the following shall take place:

- an ecological analysis shall be undertaken of the proposed lighting in coordination with lighting engineers.
- Appropriate amendments to lighting proposals (including lighting locations, type, intensity and timing) shall thereafter be incorporated into the amendments with explanations of where and why changes have been made.

The analysis, and amendments shall then be submitted to and approved in writing by the LPA and thereafter implemented.

Reason:

Many species active at night (e.g. bats, badgers and otters) are sensitive to light pollution. The introduction of artificial light might mean such species are disturbed and/or discouraged from using their breeding and resting places, established flyways or foraging areas. Such disturbance can constitute an offence under relevant wildlife legislation. Limiting negative impacts of light pollution is also in line with paragraph 185 of the NPPF.

Habitat Creation, Management and Monitoring Plan

A Habitat Creation, Management and Monitoring Plan for the offset site area shown on 'Figure 2: Off-Site Proposed Enhancements' (WIE18037-127_GIS_17TN_3A), shall be submitted to, and be approved in writing by, the local planning authority prior commencement of the development. The content shall include the following.

- i) Description and evaluation of the baseline site including: the soils characteristics, the existing vegetation and any other constraints or features or the land which impact upon the habitats which can be created and the way in which they can be created and managed.
- ii) Ecological trends and constraints on site that might influence creation and/or management.

- iii) Detailed plans and specifications for the retention, enhancement or creation of habitats on site. These must be produced in coordination with landscape architects and consider amenity value, views through and beyond the site. Habitats provided must ensure metric trading rules are met and must also compensate for the varied mosaic style of habitat lost (which are more complex than the description 'Other Neutral Grassland' would imply). Designs should seek an informal mix of grassland, trees, scrub and some wetter areas, some slight changes in soil levels will be appropriate for aesthetic and or ecological reasons.
- iv) Detailed plans, specifications, prescriptions and timescales for initial creation or enhancement.
- v) Aims and objectives of management, including the achievement of habitat, hedgerow and river biodiversity units.
- vi) Chosen appropriate management options for achieving aims and objectives.
- vii) Prescriptions for management actions.
- viii) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period and longer term works which are expected within the next 30 years).
- ix) Details of the body or organisation responsible for implementation of the plan.
- x) Ongoing monitoring and remedial measures.

The Habitat Creation, Management and Monitoring Plan 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 Habitat Creation, Management and Monitoring Plan shall also set out (where the results from monitoring show that conservation aims and objectives of the Plan 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 and the s106 agreement.

Reason:

To ensure appropriate protection and enhancement of biodiversity in line with the expectations of the development and policy DM34.

Time limit on development before further surveys are required.

If the development hereby approved does not commence (or, having commenced, is suspended for more than 12 months) within 18 months from the date of the planning consent, the approved ecological measures secured through Condition shall be reviewed and, where necessary, amended and updated. The review shall be informed by further ecological surveys commissioned to:

- i) establish if there have been any changes in the presence and/or abundance of protected species which could be impacted by the proposals and which would not be adequately protected by the measures in place, and
- ii) identify any likely new ecological impacts that might arise from any changes.

Where the survey results indicate that changes have occurred that will result in ecological impacts not previously addressed in the approved scheme, the original approved ecological measures will be revised and new or amended measures, and a timetable for their implementation, will be submitted to and approved in writing by the local planning authority prior to the commencement (or recommencement) of development. Works will then be carried out in accordance with the proposed new approved ecological measures and timetable.

Reason:

To provide protection to legally protected or rare species to comply with the requirements of The Conservation of Habitats and Species Regulations 2017, and the Wildlife and Countryside Act 1981 (as amended) and in accordance with para 99 of ODPM Circular 06/2005.

BC Drainage:

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

Groundwater Flood Risk

Further groundwater level data has been submitted up until March 2023, the data demonstrates that groundwater levels which shows that multiple locations reached their peak groundwater levels in February 2023. The highest groundwater level was encountered in BH110 at a level of 2.49m below ground level.

Bridge from Plot 4 to 5

In this area, the flooding mechanism appears to be complicated by interactions between the pond networks, and whilst a description of potential flood impacts has been provided for the culverted road crossing, at detailed design the LLFA require hydraulic modelling of the bridge crossing to demonstrate that there are no interactions that increase flood risk. Environment Agency flood levels including climate change allowances (Appendix F of the FRA) indicate potentially significant changes in water level. The modelling assessment should consider climate change impacts on design and flood risk. The Applicant should also confirm any scour related issues around the structure that need to be considered as part of modelling works. Drawings submitted as part of the Plot 4 to 5 Crossing Structure Technical Note show the proposed scheme. We note that the details surrounding construction will need to be dealt with as part of the Land Drainage Consent (further information can be found in the informative below).

However, there has been no consideration of any temporary works required to install the culverts. This will be dependent on the proposed working methodology for installation and silt removal without increasing pollution risk. If this is based on the use of temporary cofferdams, there may be impacts that will need to be confirmed as part of modelling for temporary works. Based on available flood mapping, there would appear to be a significant variance in water levels and presumably flows between connecting waterbodies. Evaluation should be made for both temporary and permanent works for a range of flood conditions.

Surface Water Drainage

As previously discussed, the site has been divided into six plots: Plots 1, 2A, 2B and 3 to the north of the site, Plot 4 to the east of Westhorpe Lake and Plot 5 to the south of Westhorpe Lake.

Plot 5 – Backlot and Bridge

Within the AECOM Response – LLFA Planning Response 22 August 2022 (22nd August 2022, AECOM), it is stated that the road which connects the bridge to the Backlot will be constructed with permeable materials and will be shaped ‘to shed run-off to the adjacent soft landscaping providing irrigation and biodiversity benefits’. Therefore, it has been concluded that a drainage system is not required for this section of road. However, this does not correspond what is shown on the Illustrative Plot 4/5 Crossing Alignment (60654980-ACM-XX-XX-SK-HW-000033 Revision P07, 02.03.2023, AECOM). It must be reiterated that if the road from the bridge is to be constructed by impermeable materials then a surface water drainage system must be installed to ensure that there is not an increase in flooding offsite.

It should also be noted that, no details of how the bridge structure itself will manage runoff has been provided, and therefore this information must also be submitted.

Water Quality Assessment

In order to meet the Water Quality assessment criteria, the applicant must demonstrate their compliance in reducing the risk of pollutant run off into natural water systems, including the track from the Bridge to Plot 5. Often a combination of various controls to mitigate pollutant run off will be sufficient enough to meet the criteria. Controls or SuDS on the ground surface are preferable as they help to not exceed the pollution hazard index. These methods can consist of permeable paving, green roofs and SuDS which prevent potentially harmful pollutants in all forms from entering eco-systems or our own water ways.

Calculations

At detailed design surface water drainage calculations must be resubmitted, these calculations must demonstrate that the proposed drainage system can contain up to the 1 in 30 storm event without flooding must be provided. 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.

Climate change allowances

The Environment Agency updated the climate change allowances for peak rainfall intensity in 2016. When designing a surface water drainage system, the LLFA encourage that 40% climate change allowance is used. A climate change allowance of 20% will be accepted if the system has been sensitivity checked for the 1 in 100 plus 40% climate change allowance event.

Exceedance

If any flooding occurs for the 1 in 100 year plus 40% climate change event, details of where this flooding will occur and the volume of the flooding must be provided. For rainfall events over the 1 in 100 plus 40% climate change allowance event, a drawing showing the direction of exceedance flows must be provided.

Factor of safety

A factor of safety must be applied to any calculations for the proposed surface water drainage scheme in accordance with best guidance.

Submerged Outfall

Calculations must also be provided which shows how the surface water system would function when the outfall to either the lake or the watercourse is submerged.

Floatation Calculations

It should be noted that due to the anticipated high groundwater, floatation calculations will be required. These calculations must be informed by the highest observed groundwater levels (over the winter period).

Construction Drawings

At detailed design, construction drawings for all surface water drainage components are required.

Drawings should include cover and invert levels along with details of materials.

Maintenance

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.

I would request the following conditions be placed on the approval of the application, should this be granted by the LPA:

Condition 1

Development shall not begin until a surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydro-geological context of the development, 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:

- Hydraulic Modelling to demonstrate the impact of the proposed bridge on the watercourse
- 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 of the road material between the bridge and plot 5 (Backlot)
- Details of how the bridge structure will manage surface water runoff
- 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. Calculations must also include:
 - o Floatation calculations based on groundwater levels encountered during winter monitoring
 - o Submerged outfall calculations
- 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 the occupation of the development a whole-life maintenance plan for the site must be submitted to and approved in writing by the Local Planning Authority. The plan shall set out how and when to maintain the full drainage system (e.g. a maintenance schedule for each

drainage/SuDS component), with details of who is to be responsible for carrying out the maintenance. The plan shall also include as-built drawings and/or photographic evidence of the drainage scheme carried out by a suitably qualified person. The plan shall subsequently be implemented in accordance with the approved details.

Reason

The reason for this prior occupation condition is to ensure that arrangements have been arranged

and agreed for the long term maintenance of the drainage system as required under Paragraph 169 of the NPPF.

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

fluvial, surface water and groundwater flooding to the site should the systems not be adequately maintained.

Advice to the Applicant:

Land Drainage Consent

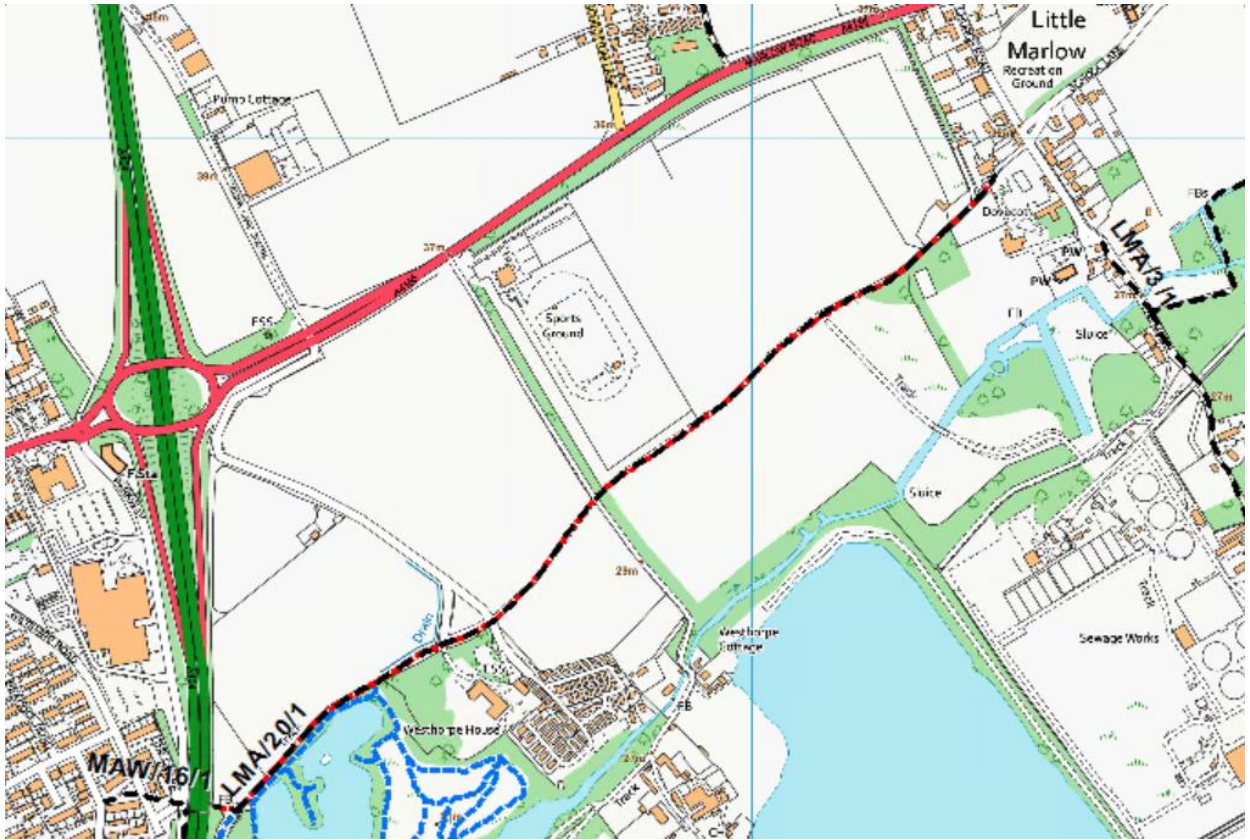
Under the terms of the Land Drainage Act 1991 and the Floods and Water Management Act 2010, the prior consent of the Lead Local Flood Authority is required for any proposed works or structures in the watercourse. After planning permission has been granted by the LPA, the applicant must apply for Land 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.

BC Rights of Way:

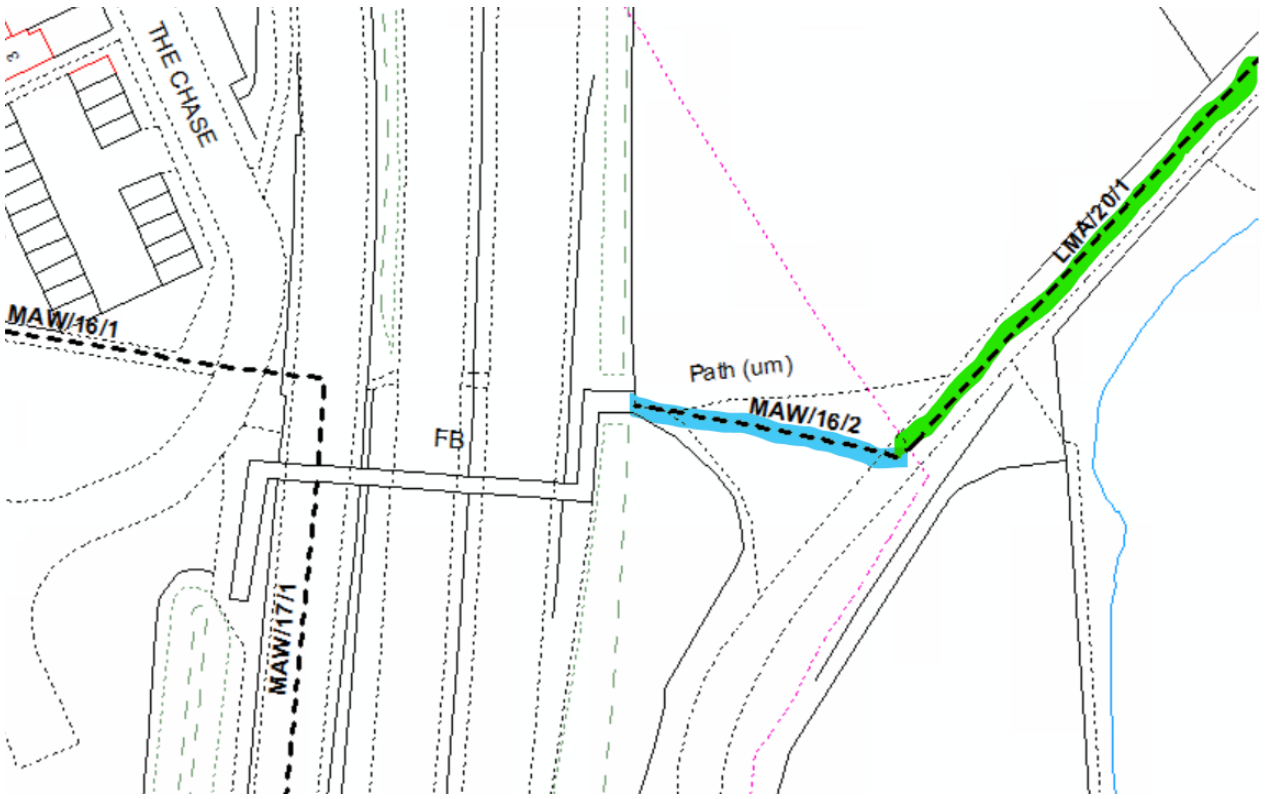
The rights of way network in the vicinity of the development is shown in Plan 1.

Footpath LMA/20/1 passes between the end of the publicly maintained vehicular highway along Pound Lane, Little Marlow and finishes about 32m east of the Volvo footbridge.

Footpath MAW/16/2 completes the final 32m link to the bottom of the eastern steps of the Volvo footbridge – see blue highlight on Plan 2; slightly at variance to the walked alignment picked up on the OS base map [marked ‘*path (um)*’] forming a triangle of connecting *de facto* paths.



Plan 1



Plan 2

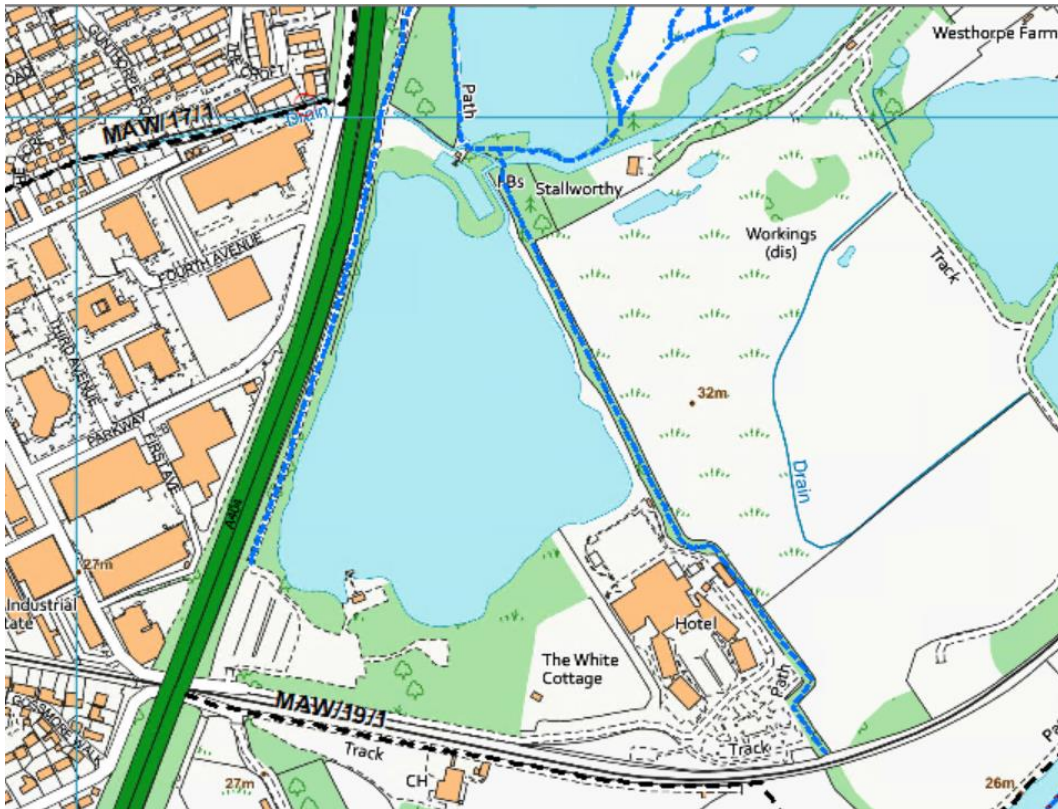
Claimed rights of way

The red-dashed lines sitting against the black dashed lines on Plans 1 and 3 [LMA/20/1 and MAW/16/2] indicate the council is in receipt of a definitive map modification order under Section 53 Wildlife & Countryside Act 1981 to record a public *bridleway* along the existing footpath alignment.

The blue-dashed lines on Plans 3 and 4 indicate the council is in receipt of a definitive map modification order under Section 53 Wildlife & Countryside Act 1981 to record public *footpaths* along alignments where no rights of way currently exist.



Plan 3



Plan 4

To note from Plan 4:

[i] the more westerly of the claimed blue routes [parallel to the A404] falls short of the publicly maintained highway along Fieldhouse Lane; and

[ii] on the more easterly of the claimed blue routes, some submitted evidence forms continue to the Thames Path, while others cease at the railway line, as illustrated.

[iii] the more easterly of the claimed blue routes, beside and running north of the hotel up to a footbridge [marked 'FBs' on the OS plan], sits outside the red edge and is unaffected by Plot 5 of the development.

Volvo Footbridge

To the west of the proposed development, the Volvo footbridge provides an important connection between town and country, as well as connecting Marlow residents with a traffic-free corridor to Little Marlow and Bourne End. It seems likely the footbridge has been in place since around 1986 – Photo 1.

Photo 1

PHOTO REMOVED (VIEWABLE ON PUBLIC ACCESS)

There are no *recorded* public rights of way up the steps and across the span of the bridge and I'm unclear if rights are secured elsewhere, such as within a planning permission. I have

confirmed with National Highways they own and maintained it, but they don't confirm access in perpetuity. They state they are:

"...not in a position to confirm that NH will maintain in perpetuity, however it stands we maintain the bridge and will continue to do so unless the A404 is detrunked should that ever occur."

The footbridge connects to the existing pedestrian network on the west side of Marlow along relatively quiet roads [attractive for cycling]. Pedestrians benefit from a 2m-wide deck and steps [Photos 2, 3 and 4].

Photo 2

PHOTO REMOVED (VIEWABLE ON PUBLIC ACCESS)

Photo 3

PHOTO REMOVED (VIEWABLE ON PUBLIC ACCESS)

Photo 4

PHOTO REMOVED (VIEWABLE ON PUBLIC ACCESS)

Staying with the footbridge, I have enquired with National Highways [July 2022] if they would support installation of wheeling ramps, as illustrated in Photo 5, to facilitate cyclists crossing the bridge from Marlow to the development, thus avoiding the Westhorpe roundabout.

Photo 5 - example wheeling ramp

PHOTO REMOVED (VIEWABLE ON PUBLIC ACCESS)

National Highways state they have previously investigated an application from Marlow residents for such an improvement, but it has been discounted by their Safety and Engineering Standards [SES] team who were reluctant to approve as it was considered a trip hazard. They state wheeling ramps have been:

"...rejected by SES twice and will not be considered".

Existing footpath condition and issues to be resolved

Continuing east from the footbridge, Footpath MAW/16/2 passes through an open grassed area, before joining LMA/20/1, which for 340m provides a relatively attractive corridor of around 6m width between barbed wire fences and benefits partly from a loose stone surface in the centre. I enclose Photos 6 and 7 to illustrate, though the 6m width is obscured somewhat by seasonal nettle and hedge growth.

Photo 6

PHOTO REMOVED (VIEWABLE ON PUBLIC ACCESS)

Photo 7

PHOTO REMOVED (VIEWABLE ON PUBLIC ACCESS)

Photo 8 - evidence of existing cycling use

PHOTO REMOVED (VIEWABLE ON PUBLIC ACCESS)

On reaching the respective private vehicular crossings to Westhorpe House and Westhorpe Park, the width is restricted by locked gates, with pedestrians diverted around the side [Photo 9].

Photo 9

PHOTO REMOVED (VIEWABLE ON PUBLIC ACCESS)

A sign stating 'PRIVATE PROPERTY KEEP OUT' also sits *within* the footpath [Photo 9], which isn't ideally located as it could be misleading to the public if they are unsure of their rights at this location. Some form of erroneous stile step exists to the side.

Continuing east, another step [in shadow – Photo 10] prevents disabled access and is an inconvenience to others. However, the link between roads is good, being surfaced and unfenced.

Photo 10

PHOTO REMOVED (VIEWABLE ON PUBLIC ACCESS)

Progressing to the next vehicle crossing, further width restrictions are evident [field gate, vehicle barrier, concrete blocks – Photos 11 and 12], though passage for walkers is relatively convenient to the side.

Photo 11

PHOTO REMOVED (VIEWABLE ON PUBLIC ACCESS)

Photo 12

PHOTO REMOVED (VIEWABLE ON PUBLIC ACCESS)

Once the second road is crossed, walkers enjoy a good surface between fences measuring variously between 6m and 9m wide, obscured somewhat in Photo 13 by seasonal vegetation.

Photo 13

PHOTO REMOVED (VIEWABLE ON PUBLIC ACCESS)

Finally, a broken vehicle barrier narrows the path width at the private road crossing to Westhorpe Cottage [Photo 14], perhaps even taking walkers off the formal right of way.

Photo 14

PHOTO REMOVED (VIEWABLE ON PUBLIC ACCESS)

The application provides the opportunity to resolve all the above issues and obstructions to ensure the route is more accessible, welcoming and attractive. For example, the concrete blocks and gates could be replaced with suitable bollards [there are examples in Department for Transport advice LTN 1/20, p.86, Fig 8.3].

The planning application

Turning to the application itself, all comments relating to access along on the vehicular highway network, in particular pedestrian and cycle movements across the Westhorpe roundabout and along the A4155, will be provided by Highways Development Management.

The Framework Travel Plan sets transport targets for sustainable modes by bus [15%], rail [4.8%], walking [8%] and cycling [7.1%]. In the context of walking and cycling, the Framework Travel Plan [para 2.25 & 2.32] and Transport Assessment [3.25 & 3.30] mentions an “*emerging mitigation strategy*”.

Clearly the A404 is a substantial barrier to walking and cycling movements from Marlow. The application mentions two alternatives to the Westhorpe roundabout from a westerly direction, illustrated by green and purple arrows on the Active Mobility Plan [Extract 1].



Figure 6.95 Active Mobility Plan

Extract 1 – *Active Mobility Plan from Design & Access Statement [p. 128] and Fig. 11 Transport Assessment [p. 29].*

*GREEN unbroken line = 'Main PROW';
PURPLE unbroken = 'Cycling Connection'; and
PURPLE broken = 'Potential New Cycling Connection'.*

The green arrow passes across the Volvo Footbridge [this isn't PROW, though is marked as such] and is for walking only. You'll note I have made enquiries with National Highways as to the public rights across the bridge. While not guaranteed, there seems to be some assurance of future maintenance and provision by National Highways and further enquiries by the applicant may reveal an obligation to provide pedestrian access across the bridge in perpetuity, thus ensuring the development's future sustainability.

Ideally, this bridge would be upgraded for cycling and disabled access through developer contributions, but this is a decision for Highways Development Management, looking at the site's sustainability as a whole, including suggested enhancements for vulnerable users to safely negotiate the Westhorpe roundabout. Nevertheless, developer-funded bridge upgrades for use by cyclists and disabled users is something I would support.

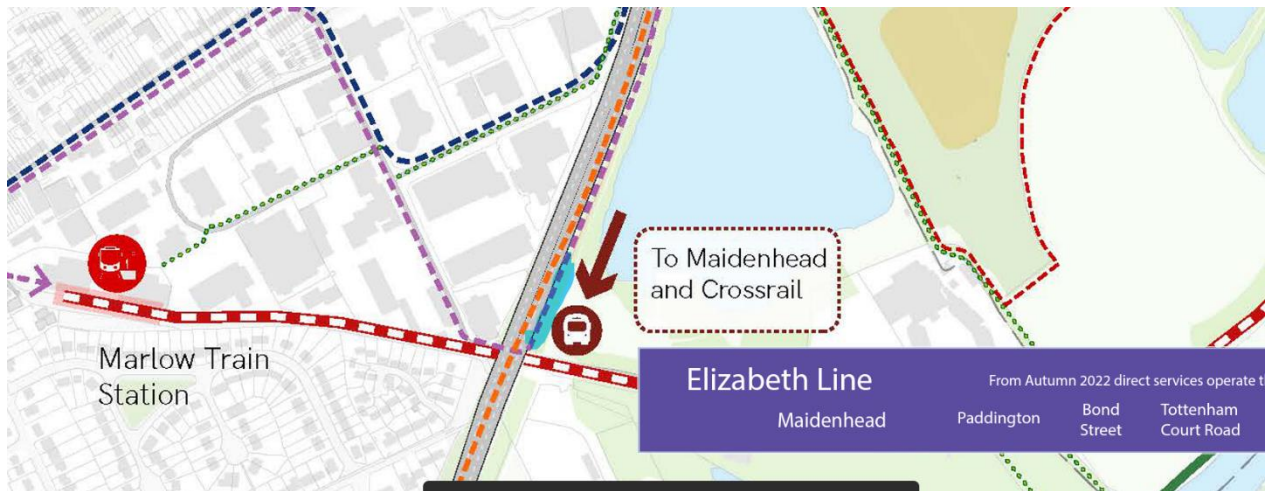
The broken purple line and arrow is summarised in the DAS [p.122] as follows:

- Contribute to the provision of a new cycling connection to Fieldhouse Lane and Marlow's train station from the Public Right of Way with the permission of the neighbouring landowners.

However, this route doesn't reach the publicly maintained highway at Field House Lane on land in control of the applicant, therefore, the route is undeliverable.

I would support construction of a 3m-wide bitumen-surfaced route [dedicated as bridleway] on land within the applications control, and this could be secured by condition. However, the short connection to Fieldhouse Lane is missing without the neighbour's consent, compromising sustainability. For example: 1] Marlow train station is only a 2-minute cycle ride from where cyclists would emerge on Fieldhouse Lane; 2] the route would be attractive for disabled users wishing to avoid the Westhorpe roundabout and unable to use the stepped Volvo footbridge; and 3] would mean the site is more accessible from the southern part of Marlow town.

Submitted plans continue the dotted line to Fieldhouse Road, suggesting connections into London via Maidenhead and Crossrail are available. My blue highlight indicates the missing link.



Extract 2 – from *Design & Access Statement* [p. 123]; *Framework Travel Plan Fig. 6* [p. 29] and *Transport Assessment* [p. 30] to illustrate public transport accessibility [my blue highlighting].

Further information is required confirming the neighbour’s consent to create this transport link.

In anticipation of permission being provided, I have recommended a condition [1] securing an appropriate path surface and dedicating public walking and cycling rights.

A further route is proposed as follows:

- Provide new cycling and walking connection parallel to the A404 connecting the Public Right of Way and the A4155.

This is illustrated below [my blue highlight on Extract 3].



Extract 3

This could connect cyclists and walkers to Winchbottom Lane, situated north of the A4155 Marlow Road, with wider cycling links to Flackwell Heath and High Wycombe. While welcome, this highlights the strategic importance of a connecting to the southern part of Marlow via Fieldhouse Lane.

There are no details of the route or proposed public opening times, so I would recommend details are secured by way of condition [2].

I have overlaid the development plan onto the rights of way map in Plan 5, which illustrates a 655m length of Footpath MAW/16/2 and LMA/20/1 passing through the proposed development.



Plan 5 - rights of way [black] and claimed routes [red and blue] overlaid onto 'Site / Block Plan'

This south-west to north-east corridor potentially benefits the development by providing a route for employees travelling to work by foot or cycle from Bourne End, Little Marlow and Marlow, albeit the connection across the Volvo footbridge restricts use to walkers only.

I understand cyclists carry their bikes over the Volvo bridge, which is unsatisfactory. The community application for wheeling tracks to National Highways and the Definitive Map Modification Order application, at least indicate an existing cycling demand, which only increases with employment situated at this location.

In order to facilitate these movements and provide certainty for cyclists wishing to commute to work, additional cycling rights need to be provided and improvements made to the surface, secured as part of recommended condition [3A]. Moreover, dedication of rights for cycling will contribute to wider aspirations to improve access for existing residents to the proposed country park and links between Bourne End and Marlow.

The application suggests a resin bonded gravel surface and low-level lighting, which I would support. The 'Hardscape' section of the Landscape Masterplan seems to indicate the upgraded PROW is 'Type 1 self-binding gravel', but this surface doesn't provide the longevity of a resin bonded material. I have included as part of condition [3B] a recommendation to ensure resin bonded gravel is provided.

A review of the existing gate/concrete block/cross rail/private sign arrangements are also needed, to be replaced with more attractive and accessible [lockable] bollards that [for

example] prevent unauthorised vehicles and tipping [see above reference to LTN 1/20]. These will maintain convenient public access and at the same time overcome legislative restrictions [s147 Highways Act 1980] authorising gates on rights of way. I have included as part of condition 3C a recommendation to ensure appropriate vehicular barriers are provided, as necessary.

There is one additional vehicular crossing of Footpath LMA/20/1 into Plot 4 to make a total of four in the vicinity. There is also additional traffic proposed to Plot 2a over an existing vehicular crossing of the same footpath. I have assumed these additional vehicle movements will be relatively light and not significant compared to the existing, but in light of the additional crossing, it would be worth consideration to allow pedestrian and cycling priority at the junction with the vehicular access to Plot 4, with adequate visibility. I have recommended this is included as part of condition 3C.

Turning to the Culture & Skills Academy building [Plot 401], the DAS [p. 285] describes Plot 4 being largely retained for nature, 'with new permissive footpaths providing enhanced public amenity'.

p. 122 of the DAS states that Marlow Film Studios will:

- Maintain and enhance the existing lakeside walk in plot 4.

Part of the claimed public footpath route sits atop Plot 401 [Plan 6].



Plan 6

Investigation of the submitted evidence provided to the council in support of the Definitive Map Modification Order claim hasn't yet commenced, but the priority will be raised upon granting of planning permission.

Nevertheless, the development couldn't be implemented until this matter is concluded, which if the claim was successful, may require the path being diverted under s257 TCPA 1990 or Building 401 relocated. I have recommended an informative [1].

The Design & Access Statement mentions venue 401 would be used by school children, requiring the paths to be closed '*at some times*'. Other plans indicate provision of permissive paths, to a lesser spatial extent than those claimed [Extract 3 above].

There remains some uncertainty over the extent of the aforementioned restrictions. For example, do they relate to the immediate surroundings of Building 401 or the whole of Plot 4 and what is the temporal extent of closures? I have a concern the proposed permissive access would be overly restrictive compared with the existing *de facto* access, which [to my knowledge] is temporally and spatially unrestricted and doesn't appear to '*maintain and enhance*', as the DAS suggests.

In the absence of certainty around the proposed access arrangements in Plot 4 and pending the Definitive Map Modification Order process, I would suggest the laying out of proposed permissive paths and their opening times are secured by condition [4], to ensure no worse situation than the existing.

Once construction commences any public footpaths will need closing temporarily and an informative is recommended [2].

Condition 1

No part of the development shall be occupied until a bridleway is dedicated under section 25 Highways Act 1980, between the adopted vehicular highway along Fieldhouse Road and Footpath LMA/20/1. The route shall be provided with a 3m wide resin bonded gravel surface, the layout and specification of which will be agreed in advance with the LPA.

Reason 1

In order to facilitate safe and convenient walking and cycling as a means of access for employees to the southern part of Marlow and the train station; to provide a lasting recreational legacy for the local community for improved connectivity between Marlow, Bourne End and to the proposed Little Marlow Country Park; and to accord with Local Plan Policy DM33, DM34, LTP4 and para 100 NPPF [2021].

Condition 2

Prior to first occupation details of the surface construction and alignment of the cycling connection running parallel with the A404 from the A4155 to Footpath MAW/16, shall be submitted to and approved by the LPA. Thereafter the route shall be constructed in accordance with the approved drawings and be publicly available for walking and cycling at all times following commencement of the development.

Reason 2

In order to facilitate safe and convenient walking and cycling as a means of access for employees; to provide a lasting recreational legacy for the local community; improve wider strategic cycling connections between south Marlow and High Wycombe; enhance links to the proposed Little Marlow Country Park; and to accord with Local Plan Policy DM33, DM34, LTP 4 and para 100 NPPF [2021].

Condition 3

No part of the development shall be occupied until the following is provided:

A] dedication of those lengths of Footpaths LMA/20/1 and MAW/16/2 passing through the application site as public bridleway under Section 25 Highways Act 1980;

B] details of cycling surface specifications along the lengths of Footpaths LMA/20/1 and MAW/16/2 within the applicant's control, detailing a 3m-wide resin bonded gravel surface passing within a corridor between fences at least 6m wide and with surface lighting, thereafter implanted in accordance with the agreed plans prior to first occupation.

C] a scheme illustrating details of a walking and cycling priority junction with the vehicular access to Plot 4 and the provision of appropriate vehicular barriers along the right of way, thereafter implanted in accordance with the agreed plans prior to first occupation.

Reason 3

In order to facilitate safe and convenient walking and cycling as a means of access for employees; to provide a lasting recreational legacy for the local community for improved connectivity between Marlow and Bourne End and to the proposed Little Marlow Country Park; and to accord with Local Plan Policy DM33, DM34, LTP 4 and para 100 NPPF [2021].

Condition 4

Prior to first occupation, a scheme detailing the provision of pedestrian footpaths through Plot 4 shall first be agreed in writing by the LPA. Thereafter the footpaths shall be laid out according to the submitted details and be available at all times following commencement of the development.

Reason 4

In order to maintain and enhance existing de facto pedestrian access within Plot 4 and to provide a lasting recreational legacy for the local community within the proposed Little Marlow Country Park; and to accord with Local Plan Policy DM33, DM34, LTP 4 and para 100 NPPF [2021].

Informative 1

Any proposed development in Plot 4 impacting upon a claimed route under Section 53 Wildlife & Countryside Act 1981, will need to await the conclusion of the Definitive Map Modification Order process before construction commences. This may in turn require a diversion under Section 257 of the Town and Country Planning Act 1990.

Informative 2

This permission shall not be deemed to confer any right to obstruct the public footpaths crossing the site which shall remain open and available unless legally stopped up or diverted under Section 257 of the Town and Country Planning Act 1990 or temporarily closed by Traffic Regulation Order under Section 14 Road Traffic Regulation Act 1984.

BC Economic Growth and Regeneration Team:

Introduction

As an Economic Growth and Regeneration Service, our aim is to support the prosperity and diversity of our local economy, encouraging business, promoting the vibrancy of our town and village centres, and supporting the provision of employment and skills opportunities for Buckinghamshire residents.

The comments that follow are solely based on our interpretation of the local economic benefits of the proposal and do not take into account any wider planning considerations.

Fit with Local Economic Strategy

As the supporting documents clearly articulate, the proposed Marlow Film Studios will support the creative and cultural sector, a key economic asset for Buckinghamshire. It will bring investment and employment to the county and will support local strategic economic ambitions around growth sectors, employment creation and skills development.

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

The Buckinghamshire Local Skills Report (2022) further makes reference to the importance of the film and television sector to the county as well as to the potential for employment creation through the Marlow proposals. It also however, highlights skills shortages within the sector.

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

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

In addition, the Economic Case for Development clearly articulates the importance of the proposal to the sector not only locally, but across the West London Cluster and the UK as a whole.

Local Economic Benefits

Employment and Skills

The Economic Case for Development forecasts that there will be an average of 2,490 construction jobs on-site throughout the construction period. In the operational phase, it suggests between 1,780 and 2,415 FTE jobs will be created.

Traditionally, unemployment in Buckinghamshire has been relatively low and consistently below regional and national averages. The Covid-19 pandemic resulted in a significant increase in unemployment levels locally, and whilst the current claimant count is on a downward trend, it still remains higher than pre-pandemic levels.

The overall county figure also conceals local variations in unemployment levels. In June 2022, for example, the claimant count rate in Buckinghamshire stood at 2.7%. Some wards in Wycombe however, experience rates significantly above this, with the claimant count reaching 7.5% in one particular ward. There remains a need for new employment opportunities to be created across Buckinghamshire and as such, we would encourage the applicants to consider how they can work with the likes of DWP/Jobcentre Plus, Restart providers, Adult and Community Learning, and other appropriate organisations to raise awareness of the opportunities available at the film studios and to support the work-readiness of individuals. The Skills and Workforce Development Plan is strong on potential efforts to encourage those already in employment to consider a career in the film and television sector and it would be good to see this level of detail applied to those currently out of work too.

Skills shortages and recruitment challenges are common in the construction and creative sectors locally (and nationally), and it is to be accepted that a number of the positions created in both the construction and operational phases will be attractive to residents from outside of the county. Consequently, the efforts proposed in the Skills and Workforce Development Plan to try and address these challenges, and thus support local opportunities, are essential. It is encouraging to see that the applicant is already in discussions with the Construction Industry Training Board (CITB) with proposals for a construction training hub onsite, and with the Bucks Skills Hub and local schools and education providers on a range of engagement spanning primary, secondary, further and higher education. To aid local

engagement, it is good to see the provision of a dedicated space onsite, the Culture and Skills Academy, to be available to local organisations to deliver education, skills and cultural programmes and activity. Ongoing outreach, partnership working and consideration to the delivery of some training and skills development within local communities and local partner facilities (in addition to onsite), will be key.

As the Buckinghamshire Local Industrial Strategy highlights, at the time of its publication the population aged 20-30 years in Buckinghamshire was 10% below the national average. Many young people leave for university and do not come back to the county. It is important that there are local opportunities available to young people, that they are aware of such opportunities and that they have the opportunity to access these. It is also accepted that efforts are needed within the film and high end television sector to increase the diversity of the workforce. The activities detailed in the Skills and Workforce Development Plan clearly support this. The engagement with primary and secondary schools and Studio Bootcamps will help to raise awareness of the opportunities in the sector whilst the work with the National Film and Television School, Bucks New University and other further and higher education providers will help equip our young people with the skills they need to succeed in the sector. It is particularly encouraging to see a commitment to working with both the schools closest to the film studios and those with more diverse and lower socio-economic cohorts.

The recent BFI Skills Review (2022) identified a number of actions that need to be undertaken to create and maintain the workforce required by the film and high end television sector. Encouragingly, a number of these are reflected in the Skills and Workforce Development Plan, including more comprehensive careers information, profiles and pathways; stronger bridges into the industry from education and other sectors; more formalised approach to hiring, workplace management and professional development and an industry led approach to investment and training.

Furthermore, it is important to not only focus on supporting people into work, but on supporting individuals into quality employment that contributes to a good standard of living and offers opportunities for progression and career development. The Economic Case highlights the highly skilled nature of many of the roles in the sector: 61% of jobs in the film and high end television sector are held by people with a degree level qualification or higher, compared to 36% for all UK industries. The creation of new traineeships, bursaries to fund ongoing training and continuing professional development will help with career progression. Brief reference is made to apprenticeships in the Skills and Workforce Development Plan, but it would be good to see the potential for apprenticeships expanded upon.

In addition to the employment to be directly created by the film studios, it is estimated that between 1,120 and 1,520 indirect FTE jobs will be created.

Local Business

There is a significant amount of expenditure associated not just with the construction of the film studios, but also in the operational phase and with each production made at the site. The Economic Case for Development, for example, forecasts the development would

generate between £130m - £155m of production expenditure for businesses in the West London Cluster (including Buckinghamshire) each year. Suggestions are put forward to encourage local procurement (directory of local suppliers, 'meet the buyer' programmes) but we would welcome further discussion around broader supply chain opportunities; monitoring and potential targets; and the scope to develop a programme of tailored support for local small and medium sized enterprises that could help them grow and succeed in the sector.

The Economic Case further highlights the advantages accruing to businesses from clustering and the economic potential of the West London Cluster, of which the Marlow Film Studios would be part. It would be beneficial to see further exploration of how, as well as the sectoral clustering, advantages could arise from proximity to key industrial sites, notably Globe Business Park and Cressex Business Park. Opportunities for collaboration between the film studios and businesses on these sites would be good to explore, not only in relation to procurement, but also around shared access, transport and mobility measures.

Impact on Town Centres and Placemaking Considerations

The proposed film studios 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 (introduction of east-west and north-south bus routes) and more active travel (improvements to footpaths for shared use by pedestrians and cyclists) 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 be enhanced, in a way that not only increases mobility but contributes to wider and longer term ambitions and regeneration strategies for these centres. For example, the much needed proposals to improve public transport links between High Wycombe and Marlow along the A404 will enhance mobility across the area, benefitting not just those working at the studios, but also those looking to travel into the area for other employment and recreational purposes, and the businesses they work for or spend in.

We would like to see consideration given to how employees at the studios can 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.

Tourism and the Visitor Economy

The opportunity to visit locations used in film and television is a major draw for tourists. As such, the Marlow Film Studios are likely to encourage increased visits to the county. We

would encourage the applicant to work with Visit Buckinghamshire to exploit the county's screen heritage in place promotion and to maximise the potential benefits to the tourism sector and local tourism businesses.

We also recognise the appeal of good quality green space for visitors to the area. Whilst the development will result in the loss of some Green Belt land there may be opportunities to explore how alternative open spaces could be further enhanced as a mitigation measure. We would be happy to liaise with colleagues in Ecology to consider how the development might be able to contribute to improvements at, for example, Spade Oak Lake Nature Reserve.

Other

The Economic Case forecasts that the Studios will generate approximately £338m in GVA each year; support annual tax revenues of up to £105m and increase exports by up to a projected £102m annually.

We would also encourage the applicants to explore potential linkages with the newly established Buckinghamshire Film Office. Utilising opportunities for those using the studios to also take advantage of the other filming locations available across Buckinghamshire would help to support economic and social benefits across the wider county.

Summary & Recommendations

The Marlow Film Studios proposal:

- Represents a significant investment in one of Buckinghamshire's key economic sectors
- Supports the delivery of the aims and ambitions of local economic strategies
- Creates a number of employment opportunities
- Offers opportunities for entry into, and progression within, the film and high end television sector
- Offers opportunities for local young people to engage with the sector and to consider, and take advantage of, opportunities that might not otherwise be available
- Supports local businesses, the tourism sector and an increase in GVA

As an Economic Growth and Regeneration Service we are keen to see the local employment, skills and business benefits associated with new developments maximised. We welcome the comprehensive Skills and Workforce Development Plan that has been submitted as part of the application and are encouraged that engagement is already underway with the Bucks Skills Hub, local schools, Bucks New University, CITB, ScreenSkills and other key stakeholders. We note the support that these organisations have expressed and would add our full support to the application also.

We would welcome the opportunity to work with the applicant moving forward, as a member of the proposed Local Education Taskforce and in aiding further development of elements of the Skills and Workforce Development Plan, to help ensure the local economic benefits that this proposal can generate are realised.

We also appreciate that the proposal, and the increased traffic movements it will create, will have an impact on nearby town centres. As such, the Service will be looking to participate in further conversations with colleagues in Planning, Transport and others as appropriate, to ensure that appropriate mitigation measures are in place and to capitalise on some of the wider place making opportunities that could arise.

BC Climate Response:

The following comments have been prepared by the Climate Response team in response to the Energy Statement and Sustainability Statement submitted as part of the above planning application.

Energy Statement

The Climate Response Team has the following comments on the Energy Statement. We would refer the applicant to the following Figure in terms of the steps and descriptions for the Energy Hierarchy:



Figure 1: The Energy Hierarchy¹

The “Be lean” step is correctly identified as reducing demand within the Energy Statement. However, we disagree with the explanations for “Be clean” and “Be green” within the ES, preferring the Tier 2 and Tier 3 descriptions above to deploy energy efficiently and source energy from renewable or low carbon sources respectively.

As explained within Section 3.2 (Calculating CO₂ Emissions and Savings) and Section 4 (Baseline CO₂ Emissions and Annual Energy Demand) of the Energy Statement, a representative sample of the buildings that would make up the proposed development site were modelled to estimate baseline and actual regulated CO₂ emissions. This involved the

¹ [The Energy Hierarchy: a powerful tool for sustainability \(imeche.org\)](https://www.imeche.org) (accessed 26th Sep. 2022)

modelling of 5 buildings, covering the major building types proposed. It is explained within the ES that:

“Where an exact match of building type was not available, the most suitable model was selected for each building based on construction type and building function. Whilst modelling was not undertaken for some building uses, such as retail buildings in the proposed pavilion and transport hub buildings, these uses are small compared to the Site as a whole and are expected to have similar specifications to the modelled buildings.”

Whilst this method of calculation is considered to be acceptable as part of an initial, high-level assessment of the development’s proposed CO₂ emissions, if the planning application were approved, more detailed modelling/ assessments would be required by the Climate Response Team prior to construction. This would need to involve the modelling of all buildings proposed on site as opposed to relying on estimated baseline and actual figures and CO₂ savings and can be addressed as part of a condition.

It is acknowledged that policy CP12 (Climate Change) of the Wycombe Local Plan states that *the Council promotes mitigation and adaptation to climate change through the use of district heating or combined heat and power on larger scale developments*. However, the exclusion of combined heat and power (CHP) from the proposed energy strategy, as stated within Section 6 (“Be Clean” – Decentralised Energy) is welcomed. This is because whilst CHP may have previously been considered a suitable technology, given the decarbonisation of the electricity grid, the consensus has now moved on. Moreover, considering the unabated emissions from CHP and the current oil and gas prices, it is the Climate Response Team’s position that very robust assessment would have been required to justify its use.

The Climate Response Team welcomes the proposed installation of photovoltaic panels and air source heat pumps given the Government’s targets to decarbonise the UK’s electricity system and policies CP12 and DM33 of the Wycombe Local Plan.

The above points notwithstanding, the Energy Statement (ES) that has been provided is suitable only as an initial, high-level estimate – as recognised within the first paragraph of Sub-Section 3.2. A detailed ES must be supplied providing a re-calculated baseline and savings based upon the final, individual building designs rather than a representative, estimated sample. This is included in Condition 1 under “Recommended Conditions”.

As recognised within the Sustainability Statement, energy use when in operation is often higher than that predicted at the design stage. This can be due to certain assumptions on occupation patterns used in modelling during the design phase being different to those in practice, or due to systems not being installed or controlled as intended. As such, if the planning application were to be approved, following construction but prior to first occupation or use, the applicant should provide a verification report demonstrating the “as built” energy performance of the development. This should provide details on the final U-values, air tightness, g-values etc. This is to verify that the development has been constructed such that it performs at least as well as laid out in the submitted Energy Statement, is compliant with Part L of the Building Regulations and because the “Performance Gap” between the design performance and as built performance presents a

serious challenge to the credibility of the UK construction industry's sustainable ambition. The Local Planning Authority must approve this verification report prior to first occupation. This is dealt with in Condition 2 under "Recommended Conditions".

Overall, subject to the above points being addressed through the proposed Conditions, the Climate Response Team has no objections to the Energy Statement.

Sustainability Statement

It is acknowledged that Section 3 of the Sustainability Statement (Climate Mitigation) is largely a repetition of that contained within the Energy Statement and so, the Climate Response Team have no further comments to make on this section of the document.

Consideration of 'Resource Efficiency and [the] Circular Economy', as demonstrated in Section 7 is welcomed. It is noted that "the detailed design will consider the use of:

- Modern methods of construction (MMC);
- Pre-fabricated materials, standardised modulation components, or low waste fabrication techniques where feasible;
- Pre-cast concrete options; and
- Recyclable or second-hand materials (rather than non-recyclable materials) from local or sustainable sources where available."

If the application were approved, the Climate Response Team would require the applicants to provide evidence of waste reduction throughout the entire development, prior to occupation. Again, this could be addressed by way of condition. It is also requested that the council's waste team is consulted on the proposal.

The Climate Response Team requests that the information on transport, ecology, arboriculture, waste collection, pollution (to also include noise and lighting), drainage/ flood risk is directed to the relevant specialists as we have no comments to make on these sections of the Sustainability Statement.

Recommended Conditions

If you are minded to recommend approval, we recommend imposition of the following conditions:

If you are minded to recommend approval, we recommend imposition of the following conditions:

Condition 1

No building shall be occupied until a detailed Energy Statement has been submitted to and approved in writing by the LPA. The statement shall include a robust, detailed assessment of the feasibility of measures to utilise decentralised, renewable or low-carbon sources of energy.

Reason: To ensure the development is sustainable and to comply with the requirements of Policies CP12 & DM33 within the Wycombe District Local Plan (2019).

Condition 2

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

- Reason: To ensure the success of the Local Plan and fulfil the monitoring requirements outlined within Chapter 7 of the Wycombe District Local Plan.

Concluding Remarks

We have reviewed the Energy & Sustainability Statements and provided comments where relevant, including proposals for conditions where necessary. We have no objection to these statements.

BC Minerals & Waste:

Summary:

Policy 1 of the Buckinghamshire Minerals and Waste Local Plan (BMWLP) sets out the Mineral Safeguarding policy stance for the county. Proposals for development within Mineral Safeguarding Areas (MSAs) other than which constitutes exempt development, must demonstrate that:

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

The policy also requires the submission of a Mineral Assessment detailing a number of matters.

Discussion:

Policy 1 of the BMWLP in summary seeks to prevent needless sterilisation of mineral resources of local and national importance by non-minerals development.

In consideration of the criteria listed in Policy 1, the applicant's proposals do not fulfil the requirements of the first bullet as they are not seeking prior extraction.

The case of the applicant pertaining to the second bullet point is put forward within the mineral assessment accompanying the application. The assessment concludes that the mineral underlying the proposal is not of any value or potential value by virtue of the costs associated with extraction and other complications. Further to this, prior extraction is argued to be likely to harm the viability of the proposal were it to be required.

The applicant also makes the case of an overriding need for the development in reference to the fourth bullet point of policy 1. Within the Planning Statement, the applicant further adds that the need for the film studio development and the early delivery of the development (which the applicant states would be delayed by prior extraction and associated infilling) outweighs the benefits of extracting any remaining mineral.

Comment:

Further information regarding the costs associated with extraction in the areas referred to as Plot 3 North, Plot 3 East and Plot 5 East is requested prior to determination. In particular it is requested that costings for mineral extraction were inert wastes imported not under CL:AIRE protocol is provided. Further, it is requested that further information is provided regarding how the cost of extraction would impact the overall viability of the proposal.

The quantum of mineral identified within Plot 3 North, Plot 3 East and Plot 5 East is not insignificant with circa 351,000 tonnes of sand and gravel potentially available. It is considered that at this time it has not been adequately demonstrated that the mineral is of no value. Therefore, the proposal would likely lead to the unnecessary sterilisation of mineral. Arguments of overriding need are a matter for the case officer to consider.

Other matters:

Internal discussions with regards to handling the overlap of the proposal area with ROMP consent ref: WR/2784/61 are ongoing at this time.

Statutory Consultees:

Department for Levelling Up, Housing & Communities:

No comments to make on the Environmental Statement.

Royal Borough of Windsor & Maidenhead (RBWM):

The Local Planning Authority does not wish to raise any objections to the proposed development, as the consideration of the application in accordance with relevant development plan policies is carried out by the neighbouring Local Planning Authority in determining the application. However, the Local Planning Authority would like to note that the technical assessment of the proposals, carried out by the neighbouring Local Planning Authority, should consider any highways data submitted regarding the roundabout junction (A308 Marlow Road) and Cookham Bridge (Ferry Lane), to ensure that the development would not impact these RBWM junctions and the surrounding highways network. Furthermore, your attention is drawn to the comments raised by the Cookham Society in their representation on the application.

Highways England:

Referring to the consultation on a planning application dated 23rd June 2022 referenced above, in the vicinity of the A404 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); recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~
- b) recommend that planning permission not be granted for a specified period (see reasons at Annex A);*
- ~~c) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.¹

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.

The Local Planning Authority must also copy any consultation under the 2018 Direction to PlanningSE@nationalhighways.co.uk.

Annex A National Highways' assessment of the proposed development

National Highways 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.

In the case of this development proposal, our interest is in the A404, specifically the Westhorpe Interchange (A4155/ A404) and Bisham Roundabout (A404/A308/Marlow Road) and the M40 including Handy Cross Roundabout (M40/A404/Wycombe Road/A4010/Marlow Road).

Following the initial review of information available on the Buckinghamshire Council planning portal, we raised concerns regarding the Transport Assessment methodology and expected impact of the proposed development on the SRN. This was set out in our previous holding responses dated 13th July 2022, 7th September 2022, 1st November 2022, 21st December 2022, 6th April 2023, 25th May 2023, 20th July 2023 and 14th September 2023. We requested for the applicant to provide model files used to model the Westhorpe Interchange (A4155/ A404) and also advised that further information will be requested once a detailed review has taken place.

Since then, we have been in contact with the applicant's consultants and held meetings on the 29th July 2022, 18th August 2022, 22nd September 2022, 12th October 2022 and 20th December 2022. We provided information to the applicant's consultants in relation to the Volvo pedestrian footbridge (map of PRow in the vicinity of the bridge, general arrangements drawing and the General Inspection report). We also responded to the consultation dated 10 March 2023 regarding the Amended Plans. Following this, we have held further meetings with SLR Vectos who have more recently been appointed as Transport and Mobility Planning consultants for the scheme. This includes meetings on the 8th June 2023, 29th June 2023, 20th July 2023, 7th August 2023, 10th August 2023 and 20th September 2023.

Additional Information Consultation (ref: 22/06443/FULEA)

A formal consultation for additional information associated with the application (ref: 22/06443/FULEA) was received by Buckinghamshire Council on 11th September 2023. The key additional documents of relevance to National Highways includes the following:

- Supplementary Transport Assessment - dated 4th September 2023;
- VISSIM Modelling Briefing Note - dated 11th September 2023.

It is noted that the VISSIM Modelling Briefing Note supersedes Section 4 and Appendices G, H and I of the Supplementary Transport Assessment. These documents have been reviewed and comments and actions are provided below under key topic headings.

Supplementary Transport Assessment

The Supplementary Transport Assessment (STA) follows a Second Transport Assessment Addendum dated June 2023, which National Highways provided feedback and actions to the applicant as set out in our previous NHPR dated 20th July 2023.

Junction Design – Westhorpe Interchange (A4155/ A404)

Up to date geometric compliance drawings for the proposed mitigation scheme at the Westhorpe Interchange and the new site access roundabout have been provided in the STA at Appendix B.

National Highways has reviewed the supplied drawings and requires the following information to confirm compliance with DMRB:

- The circulatory carriageway width downstream of the three lane entry arms (Option 1 – east arm, Option 2 east and west arms);
- The entry radius for the A4155 Little Marlow Road (west) arm (Option 1 only); and
- The effective flare length for all arms (Options 1 & 2).

The Applicant is requested to provide missing geometric measurements in order to confirm DMRB compliance.

The entry path radii for all arms are categorised as departures (deviating significantly) from the DMRB compliant maximum of 100m. For the north and west arm entries the departure can be attributed to the current design of the junction, although it is noted the departures are exacerbated by the amended design. The east (169.64m) and south (137.5m) arm entry radii departures are attributed to the proposed design and present a safety risk, with vehicles potentially being encouraged to approach the roundabout at excessive speeds. The entry path radii on the east (A4155 Marlow Road) and south arms (A404 Northbound on-slip) should be revised, to a maximum of 100m in order to comply with DMRB requirements.

The circulating carriageway width for Option 1 is categorised as a departure from the DMRB compliant range of 1.0-1.2 times the arm entry widths. The narrowest point of the circulatory is measured at 8.0m on the northern section, which is below the 8.36m entry width of the south arm. The entry width for the south arm (A404 Northbound on-slip) must be amended to a value within 1.0-1.2 times the circulatory carriageway width.

The proposed signalised crossings over the A404 southbound off-slip and A404 northbound off-slip are connected by a shared use walking and cycling footway. In the Walking Cycling and Horse Riding Assessment and Review (WCHAR) the applicant notes that the footway width will be increased to 3m and parapet height to

1.5m. A dimension drawing demonstrating compliance with the principles set out in LTN 1/20 must be provided.

VISSIM Modelling Assessment - Westhorpe Interchange (A4155/ A404) – Covered in the VISSIM Modelling Briefing Note

National Highways previously requested swept path analysis to be conducted for a bus or similar-sized HGV for the site exit, which has been provided in Appendix C of the STA. It is noted that the bus/HGV straddles both the main lane and flare of the site exit arm at the site access roundabout, therefore the priority rules for this arm in the model should be set accordingly.

The Applicant must ensure priority rules reflect bus/HGV block all other vehicles on site exit arm at site access roundabout.

The proposed mitigation scheme which signalises the Westhorpe Interchange roundabout is proposed to operate under MOVA control. The applicant has replicated MOVA by updating the signal plans in every 15 -minute period and providing additional time (1-2 seconds) to the A404 off -slips during the time intervals of highest flow (after 08:30 in the AM peak and after 17:30 in the PM peak). This has resulted in lower levels of queuing reported for both the northbound and southbound off slips compared to the previous iterations of the model. It is noted that the reported levels of queuing from the VISSIM modelling implementing MOVA does not result in blocking back past either the northbound or southbound merge points with the A404 mainline.

It should be noted that any changes to the geometric design of the proposed mitigation at Westhorpe Interchange in response to earlier design compliance actions, would need to be reflected in the VISSIM modelling assessment.

Travel Plan

A Travel Plan has been prepared to support the sustainable objectives of the development, which targets mode shares of 60% for single occupancy vehicle, 20% for public transport and 15% for active modes. This represents a 24% reduction from the 84% single occupancy vehicle mode share reported for Wycombe 020 MSOA in the 2011 UK Census.

These target mode shares are considered highly ambitious, given the site's location on the fringes of Marlow and the nature of work conducted at a typical film studio which is anticipated to require a niche, specialist workforce, a significant proportion of whom will likely not reside locally. It is however noted that the sustainable mode share target may be more realistic for non-specialist staff who will be more likely to reside locally. The applicant is required to demonstrate evidence validating the proposed sustainable travel mode share target, this should be linked to measures set out in an Operational Management Plan for the site.

Operational Management Plan

The Applicant states that an Operational Management Plan will be provided to set out how the site will be operated to minimise car usage especially during peak traffic periods. An Operational Management Plan must be provided to National Highways for sign off, it should set out the measures intended to reduce the level of traffic using the SRN as a mechanism to mitigate development impact to an acceptable level.

Walking Cycling and Horse-Riding Assessment and Review

Within the WCHAR the applicant commits that as part of the Travel Plan mode share monitoring, if additional improvements are required to achieve active mode share targets the applicant would be willing to provide a financial contribution to provide accessibility compliant ramps and stairs for the approaches to the Volvo Footbridge. Whilst a financial contribution is welcome, it should be noted that any subsequent improvement scheme to

the Volvo footbridge would be subject to agreement with National Highway and would need to be designed in line with the latest industry design standards.

M40 Junction 4 Handy Cross Roundabout

National Highways previously noted that the development flows (Unmanaged scenario) entering the junction from the A404 south arm amounts to 182 PCUs in the PM peak. It is noted that the agreed flows which were presented by the Applicant in the TA Addendum Appendix H present an equivalent figure of 238 PCUs, resulting in a discrepancy of 56 PCUs on the A404 south arm. Clarification is required on the discrepancy in PM peak development traffic on the A404 south arm (Handy Cross).

The Handy Cross model outputs shows the A404 northbound arm operating above capacity with development traffic. Whilst it is recognised that the junction currently experiences congestion during the peak periods, the reported level of increase of queue and delay on the A404 requires careful consideration. The applicant must consider ways to mitigate the impact of development traffic to an acceptable level at the junction. The applicant is required to prepare an Operational Management Plan, setting out measures intended to reduce the level of traffic using the SRN as a mechanism to mitigate development impact to an acceptable level.

A404 Bisham Roundabout

In response to National Highways comments on the Second Transport Assessment Addendum, the applicant has undertaken queue surveys at Bisham Roundabout in September 2023. This data and commentary of base model validation is outstanding. Applicant to provide queue data and accompanying commentary demonstrating the A404 Bisham Roundabout has been appropriately validated.

Additionally, the Operational Management Plan identified as a previous action will be a useful mechanism to support with mitigating development impact to an acceptable level.

GG119 Compliant Road Safety Audit 1

Following the design checks identified in the actions set out within the Westhorpe Interchange Junction Design section of this NHPR, a GG119 Compliant Road Safety Audit 1 will be required in due course to fully assess the safety of any design proposals.

Given the complexity of the scheme, interaction between the local and strategic road network and importance of walking and cycling connections in conjunction with assessment of vehicular impacts, collaboration between National Highways, the applicant and Buckinghamshire Council will be very important for the progression of the application.

Next Steps and Process

Should the identified actions be resolved we envisage the following steps being required for an agreement to be reached regarding determination of the planning application:

1. Resolution of the outstanding actions identified within the NHPR;
2. GG19 Compliant Road Safety Audit of the Westhorpe Interchange—any actions derived from this assessment will require a designer response and could result in subsequent iterations of the VISSIM modelling assessment depending on the level of design changes;
3. Agreement on appropriate planning conditions – at this stage we are minded that this will include a Framework Travel Plan, Operational Management Plan, Construction Environmental Management Plan and any subsequent assessments derived from reaching agreement of actions identified in point 1.

Recommendation:

National Highways recommends that the Local Planning authority does not grant planning permission for the application (Ref: 22/06443/FULEA) for a period of 56 days (until 24 November 2023).

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.

Standing advice to the local planning authority

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 73 and 105 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 104 and 110 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of [PAS2080](#) promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.

Supplementary Transport Assessment and VISSIM Modelling Briefing Note Review (reviewed by National Highways):

Introduction

- 1 Marlow Film Studios (the Applicant) are proposing a new development on the land located along the A4155 to the east of the A404 Westhorpe Interchange near Marlow.
- 2 The Applicant submitted a Supplementary Transport Assessment (STA) directly to National Highways on 4th September 2023 in support of the proposals which is the subject of this review. This was subsequently followed by a formal consultation letter (dated 11th September) from Buckinghamshire Council regarding planning reference 22/06443/FULEA, requesting comments on the STA by 11th October 2023. The STA follows a 2nd Transport Assessment Addendum dated June 2023. Additionally, the applicant submitted a VISSIM Modelling Briefing Note on the 11th September 2023 which supersedes Section 4 and Appendices G, H and I of the STA.
- 3 In addition, modelling work has been submitted in August 2023, which included both VISSIM microsimulation modelling covering the Westhorpe Interchange and standalone junction modelling covering the M40 Junction4 Handy Cross (LinSig) and A404 Bisham roundabout (Junctions 10) junctions. National Highways provided two technical responses to the Applicant for both of these workstreams

on 25th August 2023.

- 4 The STA covers the following topics:
 - Sustainable Transport Strategy, including details of the Walking Cycling and Horse-riding assessment and review (WCHAR), Travel Plan and Monitor & Manage Strategy;
 - Baseline & Future Traffic Flows;
 - Junction Impact Assessment, conducted using a VISSIM microsimulation model, with the results focusing on the following three key junctions of the study area including A404/A4155 Westhorpe Interchange Roundabout, A4155 Little Marlow Road / Parkway Roundabout and the Site Access Roundabout (A4155 Marlow Road / Pump Lane South / Site Access); and
 - Wide Area Network Impact Assessment, conducted using individual junction models, includes additional PIA data assessment.
- 5 This Technical Note reviews and provides comment on the contents of the STA and VISSIM Modelling Briefing Note that are relevant to National Highways. A list of technical items that are considered to remain outstanding have been presented in **bold underline text**.


Junction Design

- 6 Up to date geometric compliance drawings for the proposed mitigation scheme at the Westhorpe Interchange and the new site access roundabout have been provided in the STA at Appendix B. These have been included for reference in **Appendix A** of this Technical Note.
- 7 National Highways has reviewed the supplied drawings and requires the following information to confirm compliance with DMRB:
 - The circulatory carriageway width downstream of the three lane entry arms (Option 1 – east arm, Option 2 east and west arms);
 - The entry radius for the A4155 Little Marlow Road (west) arm (Option 1 only); and
 - The effective flare length for all arms (Options 1 & 2).
- 8 **ACTION: Applicant to provide missing geometric measurements in order to confirm DMRB compliance.**
- 9 The exit widths for all arms are categorised as relaxations (deviating slightly) from the DMRB compliant ranges of 7.0-7.5m for single lane exits and 10.0-11.0m for dual lane exits. For the north, south and west exits the relaxation can be attributed to the current design of the junction. For the east arm the exit width of 7.55m is 0.05m higher than the highest compliant width of 7.5m. It is noted that this exit arm carriageway could be narrowed slightly with wider hatching should the junction design require updating.
- 10 The entry path radii for all arms are categorised as departures (deviating significantly) from the DMRB compliant maximum of 100m. For the north and west arm entries the departure can be attributed to the current design of the junction, although it is noted the departures are exacerbated by the amended design. The east (169.64m) and south (137.5m) arm entry radii departures are attributed to the proposed design and present a safety risk, with vehicles potentially being encouraged to approach the roundabout at excessive speeds.
- 11 The applicant is therefore required to revise the design to result in entry radii which

fall below 100m and comply with DMRB. Where possible, the mitigation scheme should look to address the existing departures.

- 12 **ACTION: The entry path radii on the east (A4155 Marlow Road) and south arms (A404 Northbound on-slip) should be revised, to a maximum of 100m in order to comply with DMRB requirements.**
- 13 The circulating carriageway width for Option 1 is categorised as a departure from the DMRB compliant range of 1.0-1.2 times the arm entry widths. The narrowest point of the circulatory is measured at 8.0m on the northern section, which is below the 8.36m entry width of the south arm. The entry width should be revised to a value within the DMRB compliant range.
- 14 **ACTION: The entry width for the south arm (A404 Northbound on-slip) must be amended to a value within 1.0-1.2 times the circulatory carriageway width.**
- 15 The remaining geometric measurements are confirmed to comply with DMRB requirements. The proposed signalised crossings over the A404 southbound off-slip and A404 northbound off-slip are connected by a shared use walking and cycling footway. In the Walking Cycling and Horse Riding Assessment and Review (WCHAR) the applicant notes that the footway width will be increased to 3m and parapet height to 1.5m.
- 16 **ACTION: A dimension drawing demonstrating compliance with the principles set out in LTN 1/20 must be provided.**
- 17 Following the design checks identified in the actions set out within the Westhorpe Interchange Junction Design section of this NHPR, a GG119 Compliant Road Safety Audit 1 will be required in due course to fully assess the safety of any design proposals.
- 18 Given the complexity of the scheme, interaction between the local and strategic road network and importance of walking and cycling connections in conjunction with assessment of vehicular impacts, collaboration between National Highways, the applicant and Buckinghamshire Council will be very important for the progression of the application.

Sustainable Transport Strategy

-  Travel Plan
- 19 An updated Framework Travel Plan has been included within the submitted STA appendices. The key elements of this document include:
 - Appointment of a Travel Plan Coordinator once the site is operational;
 - Monitoring through Travel Plan Surveys and the 'Monitor & Manage' approach; and
 - Provision of a Mode Share Incentive Scheme to incentivise use of sustainable transport. This will be secured through a Section 106 Agreement.
 - 20 The following Travel Plan objectives are relevant to National Highways:
 - To influence travel behaviour;
 - To encourage a modal shift in travel towards more sustainable methods of travel;
 - To reduce the need for unnecessary journeys;
 - Reduction in overall mileage; and
 - Accommodating those journeys that need to be made by car.
 - 21 The Travel Plan objectives are considered appropriate from the perspective of National Highways and comply with the overall aim of maintaining the

safety and operation of the Strategic Road Network.

- 22 The Travel Plan targets aim for a mode share of 20% for public transport and 15% for active modes (walking and cycling). For reference, the mode shares reported for the Wycombe 020 MSOA in the 2011 UK Census were 3.3% for public transport and 7.6% for active modes.
- 23 The single occupancy vehicle driver target mode share is 60%, a reduction of 24% from the 84% reported in the 2011 UK Census.
- 24 These target mode shares are considered highly ambitious, given the site's location on the fringes of Marlow and the nature of work conducted at a typical film studio which is anticipated to require a niche, specialist workforce, a significant proportion of whom will likely not reside locally. It is however noted that the sustainable mode share target may be more realistic for non-specialist staff who will be more likely to reside locally.
- 25 **ACTION: The applicant is required to demonstrate evidence validating the proposed sustainable travel mode share target, this should be linked to measures set out in an Operational Management Plan for the site.**
- 26 The Travel Plan's Monitor & Manage strategy includes the provision of a Mode Share Incentive Scheme, which will be secured through a Section 106 Agreement, comprising a financial penalty to incentivise achievement of mode share targets within identified timeframes. The value of the scheme and specific timeframes for delivery of mode share targets will be agreed with the Local Authority as part of the planning process. This approach is welcomed by National Highways.
 - ☐ Public Transport
- 27 The Applicant has proposed two new public bus routes within the Sustainable Transport Strategy, both of which would serve the site.
- 28 The first route is proposed to link High Wycombe and Maidenhead rail stations via the site, addressing an identified gap in local north-south links. A minimum service frequency of half an hour would apply during working hours. The second route, termed a "hopper" service, is proposed to link Marlow and Bourne End via the site, Marlow Station and Globe Business Park.
- 29 Evidence showing how the proposed bus service can contribute to the target sustainable mode share for a development of this nature should be provided, potentially as part of the forthcoming Mode Share Incentive Scheme.
 - ☐ Operational Management Plan
- 30 The Applicant states that an Operational Management Plan will be provided to set out how the site will be operated to minimise car usage especially during peak traffic periods, the OMP was recommended to the applicant in National Highways Wider Highway Assessment Review Note dated 24th August 2023.
- 31 The Applicant is required to provide evidence showing that the nature of the operational measures proposed have an impact on vehicle trips during peak periods.
ACTION: An Operational Management Plan must be provided to National Highways for sign off, it should set out the measures intended to reduce the level

of traffic using the SRN as a mechanism to mitigate development impact to an acceptable level.

- Walking & Cycling
- 32 The Applicant has presented a Walking, Cycling & Horse Riding Assessment & Review (WCHAR) which sets out the proposed improvements for pedestrians and cyclists for selected routes between the site and key destinations.
 - 33 The primary proposed walking and cycling route is via the Westhorpe Interchange, with signalised pedestrian crossings provided on both north-facing off slip arms. The footway would be widened to a minimum of three metres, with the bridge parapet height increased to 1.5 metres, subject to structural assessments.
 - 34 In addition to the primary walking and cycling route, the applicant proposes using the Volvo Footbridge crossing the A404 as part of a secondary route between Marlow and the site. It is noted that the footbridge structure is maintained by National Highways. A route on this alignment would be desirable for site users travelling from the southern areas of Marlow, as well as the station.
 - 35 The applicant proposes that if the Mode Share Incentive Scheme monitoring shows that additional improvements are required to achieve the active mode share targets, a financial contribution will be provided to provide accessibility compliant ramps and stairs for the approaches to the Volvo Footbridge. This will both enhance the footbridge route for pedestrians and make it available for cyclists.
 - 36 It should be noted that National Highways will require any improvement scheme to the Volvo Footbridge to be compliant with the latest design and industry standard guidelines.
 - 37 An alternative route to that utilising the Volvo Footbridge is noted within the STA, via a walking and cycling link to Fieldhouse Lane. Although this route is not proposed as part of the development proposals, the STA states there is a reasonable chance this link will be achieved in the near future and enhance the walking and cycling connections between the site and Marlow.
 - 38 The WCHAR provides a detailed summary of the pedestrian facilities for the respective routes via the Westhorpe Interchange, Volvo Footbridge and Fieldhouse Lane. Opportunities for additional signage and footway widening are identified.

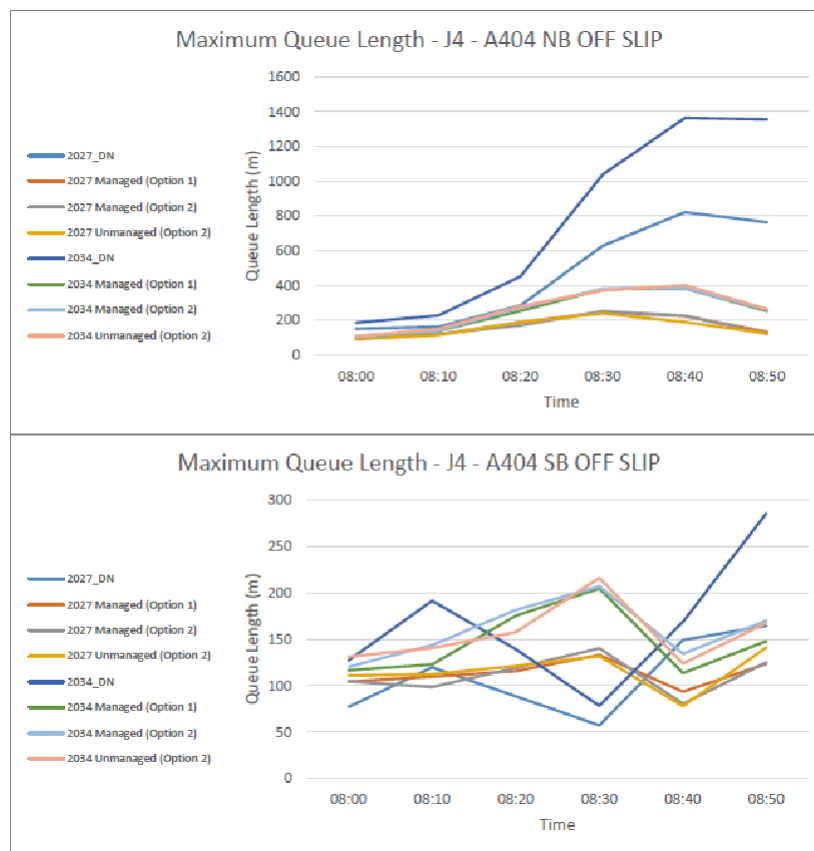
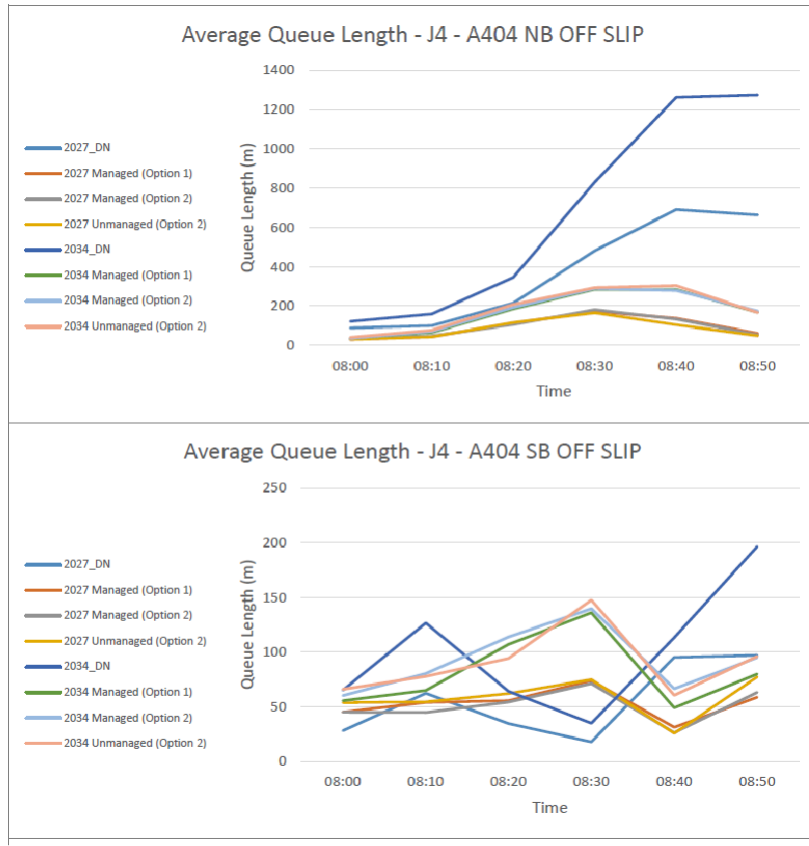
Baseline & Future Network Traffic Flows

- 39 The applicant has conducted additional traffic surveys in July 2023 at a number of junctions along the A4155 corridor.
- 40 It is noted that all junctions covered by the July 2023 traffic surveys are on the local highway network under the responsibility of Buckinghamshire Council.

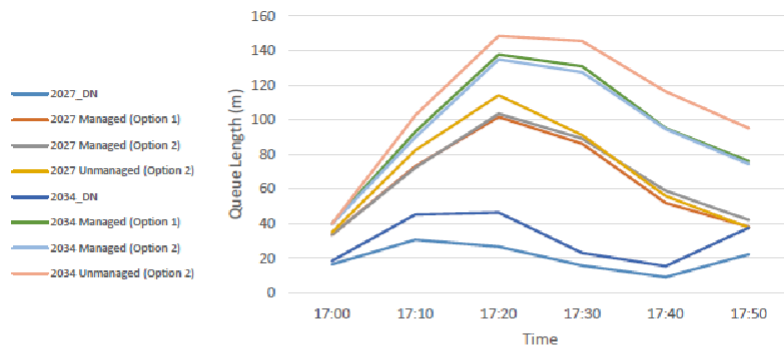
Junction Impact & VISSIM Model Assessment

- 41 National Highways previously requested swept path analysis to be conducted for a bus or similar-sized HGV for the site exit, which has been provided in Appendix C of the STA. It is noted that the bus/HGV straddles both the main lane and flare of the site exit arm at the site access roundabout, therefore the priority rules for this arm in the model should be set accordingly.

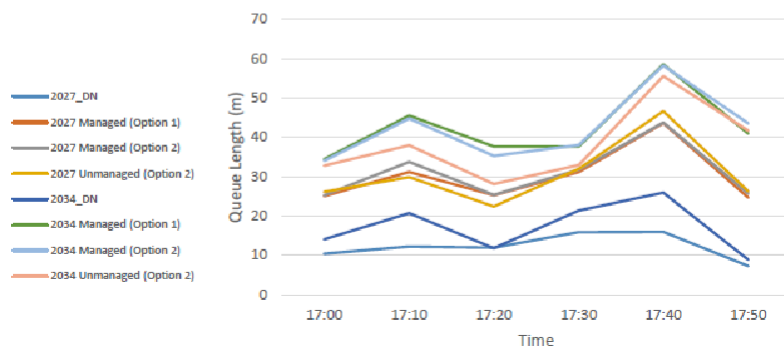
- 42 ACTION: Applicant to ensure priority rules reflect bus/HGV block all other vehicles on site exit arm at site access roundabout.**
- 43 The VISSIM Modelling Briefing Note presents an updated summary of the VISSIM model assessment, which covers the Westhorpe Interchange, proposed site access roundabout and the adjacent Little Marlow Road/ Parkway Roundabout. The model updates include an approach to model Westhorpe Interchange under MOVA signal timing control, which is in response to a previous action identified by National Highways.
- 44 The applicant has replicated MOVA by updating the signal plans in every 15 -minute period and providing additional time (1-2 seconds) to the A404 offslips when the flows are higher (after 08:30 in the AM peak and after 17:30 in the PM peak). This method is acceptable to replicate the complex MOVA roundabout operation in a simplified manner. In this way, the queues have improved for both the NB and SB offslips (2034 Unmanaged scenarios – Option 2), especially in the AM peak that were approaching the mainline in the previous model version.
- 45 As requested, following earlier modelling reviews, the applicant has tested the same design, named Option 2 (three-lane approach on Little Marlow Road between the Parkway Roundabout and Westhorpe Interchange), for both the managed and unmanaged scenarios, providing comparable results between the two scenarios.
- 46 Similarly in response to previous comments, the applicant has applied the same intergreen (5s) between the west circulatory and northbound off-slip approach to both the managed/ unmanaged scenarios. These two changes allow for comparison between the managed and unmanaged scenario. It is noted that the unmanaged scenario has been the key focus of our review.
- 47 Overall there has been an improvement in queues on both A404 SRN off-slips following representation of MOVA control into the VISSIM model.
- 48 The stacking capacity for the NB offslip is around 370 meters and for the SB offslip around 250 meters (measured from the model). As seen in the graphs below for maximum and average queue lengths, in the AM peak 2034 Unmanaged Option 2 scenario, the queues are much lower than the reference case, especially for the NB offslip, and remain below capacity. In the PM peak 2034 Unmanaged Option 2 scenario, the queues are higher than the reference case but remain well within stacking capacity of the offslips.



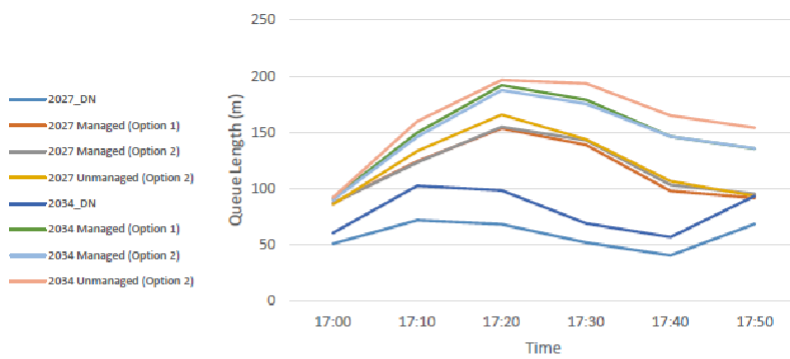
Average Queue Length - J4 - A404 NB OFF SLIP



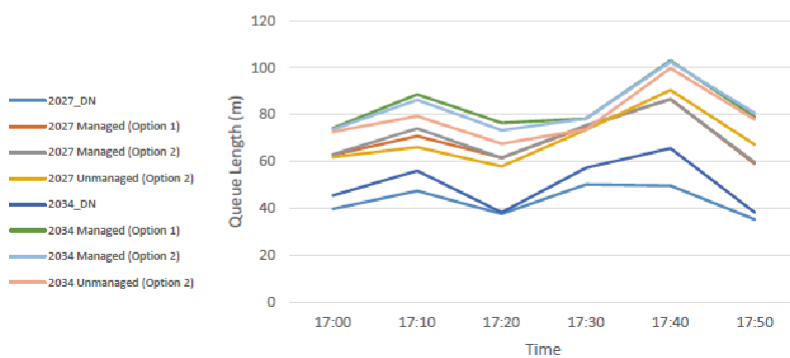
Average Queue Length - J4 - A404 SB OFF SLIP



Maximum Queue Length - J4 - A404 NB OFF SLIP



Maximum Queue Length - J4 - A404 SB OFF SLIP



Wide Area Network Impact

- 49 The STA presents an updated summary of the wider highway network assessment, which covers the M40 Junction 4 Handy Cross and the A404 Bisham roundabouts.
- 50 It is noted that since the 2nd Transport Assessment Addendum, the applicant has issued an updated set of results and commentary. National Highways issued comments on these outputs on the 25th August 2023.
- 51 The applicant has now presented an updated assessment for the two junctions. National Highways has provided comments on any outstanding elements of this assessment as well as the material that has been updated since the previous response.

-  M40 Junction 4 Handy Cross Roundabout

A404 South Arm

- 52 The Applicant has presented PM model scenarios for this arm, due to development traffic flows being higher when compared to the AM peak. This approach was previously accepted.
- 53 The signal data, queue length data for validation and the 2027 model outputs commentary were all previously accepted by National Highways.
- 54 National Highways previously noted that the development flows (Unmanaged scenario) entering the junction from the A404 south arm amounts to 182 PCUs in the PM peak. It is noted that the agreed flows which were presented by the Applicant in the TA Addendum Appendix H present an equivalent figure of 238 PCUs, resulting in a discrepancy of 56 PCUs on the A404 south arm. Clarification on this discrepancy from the Applicant was previously requested.
- 55 No explanation has been provided in the STA, therefore this point is considered outstanding.
- 56 **ACTION: Clarification is required on the discrepancy in PM peak development traffic on the A404 south arm**
- 57 National Highways previously noted that the 2034 model outputs were outstanding. The STA now provides the 2034 model outputs and accompanying commentary. It is noted that commentary on the 2027 model outputs was provided in the previous National Highways response issued 25th August 2023.
- 58 The 2034 Reference Case model outputs show a DoS value of 96% with a MMQ of 19 PCUs for the offside lane. The addition of development traffic increases the DoS to 106% and the queue to 58 PCUs. It is confirmed that a queue of this length would extend past the diverge point of the A404 northbound off slip connecting to the M40 westbound, which is located approximately 300m upstream of the stop line. It should be noted that the nearside lane MMQ would increase to 14 PCUs which would not extend as far as the diverge point.
- 59 The STA considers a queue of this length acceptable, as the nearside lane would remain clear at the diverge point.
- 60 Notwithstanding the above comments, the model outputs shows the A404 northbound arm operating above capacity with development traffic. Whilst it is recognised that the junction currently experiences congestion during the peak periods, the reported level of increase of queue and delay on the A404 requires careful consideration. The applicant must consider ways to mitigate the impact of

development traffic to an acceptable level at the junction, it is recommended that the forthcoming Operational Management Plan sets out measures intended to reduce the level of traffic using the SRN.

- 61 ACTION: The applicant is required to prepare an Operational Management Plan, setting out measures intended to reduce the level of traffic using the SRN as a mechanism to mitigate development impact to an acceptable level.**

M40 Eastbound Off Slip Arm


- 62** The applicant has presented AM model scenarios for this arm, due to development traffic flows being higher when compared to the PM peak. Only the outermost three lanes at the stopline, which are fed by the offside lane further upstream, have been modelled as these are the only lanes which traffic is permitted to route towards Marlow via the A404. This approach was previously accepted by National Highways.
- 63** The signal data, queue length data for validation and the 2027 model outputs commentary were all previously accepted by National Highways.
- 64** The 2034 Reference Case AM model outputs show a DoS value of 48% for this arm, resulting in a Mean Max Queue of 4 PCUs. The addition of development flows increases the DoS value to 51%, resulting in a Mean Max Queue of 4 PCUs. This increase is considered minimal and unlikely to have an effect on the two outside lanes on this arm. The applicant's conclusion for this arm is therefore accepted for the 2034 scenarios.

M40 Westbound Off Slip Arm


- 65** The applicant has presented AM model scenarios for this arm, due to development traffic flows being higher when compared to the PM peak. Only the innermost two lanes at the stopline, which are fed by the nearside lane further upstream, have been modelled as these are the only lanes which traffic is permitted to route towards Marlow via the A404. This approach was previously accepted by National Highways.
- 66** The signal data, queue length data for validation and the 2027 model outputs commentary were all previously accepted by National Highways.
- 67** The 2034 Reference Case AM model outputs show a DoS value of 51% for this arm, resulting in a Mean Max Queue of 6 PCUs. The addition of development flows increases the DoS value to 55%, resulting in a Mean Max Queue of 6 PCUs. This increase is considered minimal and unlikely to have an effect on the two inside lanes on this arm. The applicant's conclusion for this arm is therefore accepted for the 2034 scenarios.

-  A404 Bisham Roundabout

- 68** The applicant previously presented model outputs for the A404 Bisham roundabout in the Second Transport Assessment Addendum, for which National Highways provided comments dated 25th August 2023.
- 69** It should be noted that the following actions raised in the National Highways response issued 25th August remain outstanding.
- 70 ACTION: Applicant to provide queue data and accompanying commentary demonstrating the junction has been appropriately validated.**

- 71 Additionally, the Operational Management Plan identified as a previous action will be a useful mechanism to support with mitigating development impact to an acceptable level.
-  PIA Data
- 72 The applicant previously presented PIA data for the SRN junctions subject to assessment in a Technical Note. National Highways provided comments with associated actions for the applicant to address in the response dated 25th August 2023. The applicant has subsequently provided supplementary information in the STA to address these actions.
- 73 National Highways previously requested that junction maps clearly showing the locations of PIA incidents are presented by the applicant. The STA now includes this information, therefore this action is considered addressed.
- 74 National Highways previously identified incident clusters at the Handy Cross roundabout, specifically on the south east section of the roundabout circulatory (in the vicinity of the M40 westbound off slip approach and the A404 southbound exit) and the roundabout circulatory just north of the M40 westbound on slip arm, which required further detailed commentary. The STA now includes this information and concludes that the recorded incidents are typically a result of driver error and do not represent a safety concern when compared to the level of traffic passing through the junction.
- 75 A total of 14 incidents were recorded on the southern section of the roundabout (including the two clusters identified by National Highways) over the study period, 13 of which were classified as “Slight” and one as “Serious”.
- 76 Three incidents classed as “Slight” were recorded on the south west section of roundabout circulatory, immediately north of the M40 westbound on slip arm. One incident consisted of a motorcycle rider losing control. One incident consisted of a side wipe collision between a car and HGV. One incident consisted of a nose to tail collision between two cars.
- 77 Three incidents classed as “Slight” were recorded on the south section of roundabout circulatory, in the immediate vicinity of the A404 northbound and Wycombe Road arms. Two incidents consisted of a side wipe collision between two cars. One incident consisted of a collision between two cars.
- 78 It is considered that the recorded incidents are typically a result of driver error and do not represent a safety concern when compared to the level of traffic passing through the junction. It is therefore not considered that the addition of traffic as a result of the proposed development would exacerbate the number or severity of traffic collisions at this junction.

Summary

-  Supplementary Transport Assessment
- 79 The actions arising from the review of the STA and VISSIM Modelling Briefing Note are listed below.
- 80 **ACTION: Applicant to provide missing geometric measurements in order to confirm DMRB compliance.**
- 81 **ACTION: The entry path radii on the east (A4155 Marlow Road) and south arms (A404 Northbound on-slip) should be revised, to a maximum of 100m in order**

to comply with DMRB requirements.

- 82 **ACTION: The entry width for the south arm (A404 Northbound on-slip) must be amended to a value within 1.0-1.2 times the circulatory carriageway width.**
- 83 **ACTION: A dimension drawing demonstrating compliance with the principles set out in LTN 1/20 must be provided.**
- 84 **ACTION: The applicant is required to demonstrate evidence validating the proposed sustainable travel mode share target, this should be linked to measures set out in an Operational Management Plan for the site.**
ACTION: An Operational Management Plan must be provided to National Highways for sign off, it should set out the measures intended to reduce the level of traffic using the SRN as a mechanism to mitigate development impact to an acceptable level.
- 85 **ACTION: Applicant to ensure priority rules reflect bus/HGV block all other vehicles on site exit arm at site access roundabout.**

- Wider Highway Assessment

- 86 The previous actions identified by National Highways in the Wider Highway Assessment review for the Applicant still considered to be outstanding are listed below.
- 87 **ACTION: Applicant to provide clarification on the discrepancy in PM peak development traffic on the A404 south arm (Handy Cross).**
- 88 **ACTION: The applicant is recommended to prepare an Operational Management Plan, setting out measures intended to reduce the level of traffic using the SRN as a mechanism to mitigate development impact to an acceptable level (Handy Cross).**
- 89 **ACTION: Applicant to provide queue data and accompanying commentary demonstrating the A404 Bisham Roundabout has been appropriately validated.**

Appendix A – Geometric Compliance Drawing – A404 Westhorpe Interchange Proposed Mitigation (available to view on Public Access)

Environment Agency:

The information submitted has satisfactorily addressed our earlier concerns and subject to the *conditions* below we therefore *withdraw our previous objections*, dated 15 September 2022.

The information now submitted has provided further detail relating to risk of pollution to controlled waters and has demonstrated that this can be adequately mitigated. Further ecological information has been provided and various broad areas of ecological enhancement works are now proposed to mitigate and compensate the impacts of the proposals including the Westhorpe Watercourse crossing. This provides us with sufficient information to be satisfied that the impacts of the proposals can and will be adequately addressed through any development. It is critical that the details of these proposals are secured in any planning consent.

The Preliminary Ecological Design Strategy (DRAFT) states that the additional ecological enhancements for betterment at Westhorpe Lake and in the area that surrounds Westhorpe Watercourse are 'available, deliverable and under the applicant's control and therefore securable'. Should planning permission be granted, the local planning authority must ensure that the measures being proposed, including long term monitoring, maintenance and management (and where necessary replacement), are adequately secured through relevant planning mechanisms including legal agreements where necessary.

Condition 1

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

The EDS shall be based on the submitted Preliminary Ecological Design Strategy (DRAFT) (Waterman, 4th September 2023) – ref: WIE18037-127-17-1-7 and its appendices and shall include (but not necessarily be limited to) the following.

- a) Purpose and conservation objectives for the proposed works linked to requirements for identified species and for Biodiversity Net Gain Calculations.
- b) Review of site potential and constraints.
- c) Detailed designs and/or working method(s) to achieve stated objectives.
- d) Extent and location/area of proposed works on appropriate scale maps and plans.
- e) Specification and source of materials (plants and otherwise) to be used where appropriate, e.g. native species of local provenance.
- f) Timetable for implementation demonstrating that works are aligned with the proposed phasing of development.
- g) Persons responsible for implementing the works.
- h) Details of initial aftercare and long-term maintenance.
- i) Details of a scheme for monitoring and remedial measures, including those for the floating vegetated raft systems
- j) Details for disposal of any wastes arising from works.
- k) Retention and protection of existing habitats during construction.
- l) Habitat removal and reinstatement.
- m) Provision for wildlife corridors, linear features and habitat connectivity.
- n) Woodland, tree, hedgerow, shrub, wetland and wildflower planting and establishment.
- o) Proposed new landforms associated with habitat creation.
- p) Soil handling, movement and management.
- q) Creation, restoration and enhancement of semi-natural habitats.
- r) Plans, designs and specifications for a floating raft system (FloraFloat® system, or equivalent) to be included on Westhorpe Lake showing a minimum of 5 rafts, each of which is a minimum of 10 metres in length. The width, shape and location of each raft to be clearly indicated along with the anchoring mechanism.
- s) Ecological aspects of the design of the crossing of Westhorpe watercourse.
- t) Details of the proposed bank reprofiling alongside the Westhorpe Watercourse (including details of how impacts to bankside trees are managed), marginal planting

shelves and the proposed semi-natural wetland platforms/ vegetated central islands in the Westhorpe Watercourse channel (including location, extent, materials and construction method, and interaction with the proposed crossing including impacts of shading).

u) Details of the proposed clearance of vegetative matter from the offsite watercourse to the east and installation of features to its banks to create a varied flow profile.

v) Proposed treatment/eradication of Japanese knotweed (Reynoutria japonica) within the site.

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

Reason 1

To ensure that the proposed habitats and ecological features are appropriately designed, created and installed in accordance with expectations and to ensure that identified protected, priority and notable species are adequately catered for, in line with paragraphs 174 and 180 of the National Planning Policy Framework.

Condition 2

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:

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.
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 organisation 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 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 2

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 policies DM14 and DM15 of the Wycombe District Local Plan, adopted August 2019. This approach is supported by paragraphs 174 and 180 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

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.

- a) Risk assessment of potentially damaging construction activities.
- b) Identification of "biodiversity protection zones".
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (this must include Reasonable Avoidance Measures Method Statement (RAMMS)) on protected species.
- d) The location and timing of sensitive works to avoid harm to biodiversity features.
- e) The times during construction when specialist ecologists need to be present on site to oversee works.
- f) Responsible persons and lines of communication.
- g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person. Use of protective fences, exclusion barriers and warning signs.
- h) Pollution prevention measures to be put in place to protect the water features on and adjacent to the site.
- i) Details of a sensitive lighting scheme for use during the construction phase to minimise the impacts of light spill on the waterbodies and their adjacent habitats.
- j) Proposed treatment/eradication of Japanese knotweed (*Reynoutria japonica*) within the site.

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

Reason 3

To ensure that development is undertaken in a manner which ensures important wildlife and habitats are not adversely impacted by construction, in line with paragraphs 174 and 180 of the National Planning Policy Framework.

Condition 4

Prior to the commencement of the development, an ecologically sensitive lighting scheme shall be submitted to and approved in writing by the local planning authority. This shall be informed by the Bat Conservation Trust/Institution of Lighting Professionals Guidance Note 08/23 – Bats and Artificial Lighting at Night.

Reason 4

To minimise impacts on wildlife using the lakes and watercourse adjacent to the site and the wildlife corridors associated with them, in accordance with paragraphs 174 and 180 of the National Planning Policy Framework.

Condition 5

No development shall take place until a detailed scheme for the crossing over the Westhorpe Watercourse between Plots 4 and 5 have been submitted to and approved in writing by the local planning authority. The scheme shall include the following:

- Detailed design drawings of the crossing structure;
- Details of the materials to be used in the construction;
- Details of measures to be taken to protect the environment adjacent to the proposed crossing, both terrestrial and aquatic;
- An environmental risk assessment including details of pollution prevention measures to be employed among other measures.

Reason 5

To ensure that the crossing is designed and built to minimise its impacts on the ecological value of the Westhorpe Watercourse and the adjacent land in line with paragraphs 174 and 180 of the National Planning Policy Framework.

Condition 6

No development approved by this planning permission shall commence until the results of a Site Investigation relating to plot 4 in respect of the development hereby permitted, has been submitted to, and approved in writing by, the local planning authority. This Site Investigation report shall provide information to inform a detailed assessment of the risk to all receptors that may be affected, including those outside plot 4. It shall include (not exclusively) a minimum of three rounds of background monitoring for Per- and

polyfluoroalkyl substances (PFAS) unless otherwise agreed in writing. The monitoring will be completed up and down hydraulic gradient of Plot 4.

Reason 6

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 in line with paragraph 174 of the National Planning Policy Framework.

Condition 7

No development approved by this planning permission shall commence until a detailed site-wide Revised Remediation Scheme in respect of the development hereby permitted, has been submitted to, and approved in writing by, the local planning authority. This Revised Remediation Scheme shall be based on the Remediation Strategy ref WIE18037-100-S-2-3-2-RMS issue 2-3-2 dated October 2022 (Waterman Infrastructure & Environment Ltd), as updated by the findings of the updated Site Investigation relating to plot 4, and shall include (not exclusively):

- a) A Remediation Strategy which uses the results of the Site Investigations to carry out a detailed risk assessment, provides an options appraisal, and sets out full details of the remediation measures required and how they are to be undertaken.
- b) A Groundwater Sampling Plan to monitor groundwater prior to, during and following any groundworks to be undertaken.
- c) A Verification Plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in part (a) are complete and identifying requirements for monitoring of pollutant linkages, maintenance and arrangements for contingency action. This shall also include groundwater monitoring results and actions taken.

Any changes to these components require the written consent of the local planning authority. The scheme shall be implemented as approved.

Reason 7

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 in line with paragraph 174 of the National Planning Policy Framework.

Condition 8

Prior to any part of the permitted development being brought into use, a Verification Report demonstrating the completion of works set out in an approved site-wide Revised Remediation Scheme and the effectiveness of the remediation shall be submitted to, and approved in writing, by the local planning authority. The report shall include results of

sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

Reason 8

To ensure that the site does not pose any further risk to the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete. This is in line with paragraph 174 of the National Planning Policy Framework.

Condition 9

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by, the local planning authority. The remediation strategy shall be implemented as approved.

Reason 9

To ensure that the site does not pose any further risk to the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete. This is in line with paragraph 174 of the National Planning Policy Framework.

Condition 10

A scheme for managing any borehole installed for the investigation of soils, groundwater or geotechnical purposes shall be submitted to and approved in writing by the local planning authority. The scheme shall provide details of how redundant boreholes are to be decommissioned and how any boreholes that need to be retained, post-development, for monitoring purposes will be secured, protected and inspected. The scheme as approved shall be implemented prior to the occupation of any part of the permitted development.

Reason 10

To ensure that redundant boreholes are safe and secure, and do not cause groundwater pollution or loss of water supplies in line with paragraph 174 of the National Planning Policy Framework.

Condition 11

Piling and/or other foundation techniques using penetrative methods shall not be carried out other than with the written consent of the local planning authority following submission of a Foundation Works Risk Assessment. The development shall be carried out in accordance with the approved details.

Reason 11

To ensure that the proposed foundations do not harm groundwater resources in line with paragraph 174 of the National Planning Policy Framework.

Advice to applicant - Ecological aspects of the proposals

Should planning permission be granted and ecological measures be secured through conditions or other appropriate planning mechanisms, we would advise that the following comments are taken into account within the detailed proposals.

Figure 4.3 of the Plot 4 to 5 Crossing Structure Technical Note shows an Illustrative Image of the Proposed Structure with 3 large culverts and two smaller ones, all of which are within the wetted channel. If the outer culverts are proposed to allow dry access for mammals under the structure, then they would have to be placed further up the bank above the 1 in 100 year level plus climate change allowance. Having mammal shelves through sections of culvert that are within the channel and not connected to riverbank serves no useful purpose; the shelves are usually in place to allow dry access, but mammals would have to be in the channel to reach them. These comments apply to drawing number 60654980-ACM-XX-XX-SK-HW-000033 Rev P07 (Illustrative Plot 4/5 Crossing Alignment).

Within the Westhorpe Lake, five 10m long narrow sections of floating vegetated platform (FloraFloat system, or similar) of unknown width at various points along the eastern lake shore, are proposed. It may be preferable to install larger, less linear areas of marginal habitat, which should be possible given the modular nature of the product. It will need to be clear how these platforms will be physically secured in place.

For the proposed off-site watercourse enhancement, work is proposed along a 140m length of a watercourse on the southern boundary of the proposed off-site terrestrial enhancement area to the east of the site. In order to allow more light into the channel to encourage growth of marginal plants, thinning would be required to the trees to the south of the watercourse. Large pieces of wood could be pinned into the channel in places to act as flow deflectors. Any seed mix to be used in this area would have to have some shade tolerance; it is not clear if the suggested mix would thrive in this location. The use of plant plugs of shade tolerant plant species should be considered. Some smaller, more discreet areas of native scrub may be appropriate planting adjacent to the off-site watercourse, rather than hedging/scrub indicated on Appendix 3 – Figure 3: Off-site Proposed Enhancements, given the levels of shade that already exist in that area. All planting and seed mixes must consist of locally native species of UK genetic provenance.

Advice to applicant – Waste to be taken off site

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

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

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

If the total quantity of hazardous waste material produced or taken off-site is 500kg or greater in any 12 month period, the developer will need to register with us as a hazardous waste producer. Refer to the hazardous waste pages on GOV.UK for more information.

Advice to LPA/applicant – Environmental Permit

This development may require an environmental permit under the Environmental Permitting (England and Wales) Regulations 2016, Regulation 12.

In circumstances where an activity/operation meets certain criteria, an exemption from permitting may apply. More information on exempt activities can be found here: <https://www.gov.uk/guidance/register-your-waste-exemptions-environmental-permits>

The applicant is advised to find out more information about the permit application process online and to send a pre-application enquiry form via the gov.uk website: <https://www.gov.uk/government/publications/environmental-permit-pre-application-advice-form>

Natural England:

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 OBJECTION:

Natural England objects to this proposal. As submitted we consider it will:

- Have an adverse effect on the integrity of Burnham Beeches Special Area of

Conservation (SAC).

- Undermine the proposed mitigation for Allocation BE2 - Hollands Farm.

The proposed development is located within Little Marlow Lakes Country Park (LMLCP), the identified mitigation for Allocation BE2 - Hollands Farm within Wycombe District Local Plan (Adopted August 2019).

Natural England provided comments to application 21/06215/OUT on the 10th February 2022 agreeing financial contributions towards improvements at LMLCP in line with the Burnham Beeches SAC Mitigation Document produced by The Environmental Dimension Partnership Ltd (dated February 2022).

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.

Natural England's further advice on other natural environment issues is set out below.

Burnham Beeches Special Area of Conservation

When there is sufficient scientific uncertainty about the likely effects of the planning application under consideration, the precautionary principle is applied to fully protect the qualifying features of the European Site designated under the Habitats Directive.

Due to new evidence on the impacts of recreational and urban growth at Burnham Beeches SAC carried out by Footprint Ecology in 2019, Natural England recognises that new housing within 5.6km of the internationally designated Burnham Beeches Special Area of Conservation (SAC) can be expected to result in an increase in recreation pressure.

The 5.6km zone proposed within the Adopted Avoidance and Mitigation strategy SPD and evidence base carried out by Footprint Ecology represents the core area around the SAC where increases in the number of residential properties will require Habitats Regulations Assessment. Mitigation measures will be necessary to rule out adverse effects on the integrity of the SAC from the cumulative impacts of development.

Impacts to the SAC as a result of increasing recreation pressure are varied and have long been a concern. These impacts, which have the potential to adversely affect its interest features, include:

- Contamination (e.g. dog fouling, litter, spread of plant pathogens);
- Increased fire risk;
- Trampling/wear (e.g. loss of vegetation, soil compaction, erosion, damage to trees from climbing);
- Harvesting (e.g. fungi, wood);
- Difficulties in managing the site (e.g. maintaining the grazing regime);
- Disturbance (e.g. affecting the distribution of livestock and deer).

In light of the new evidence relating to the recreation impact zone of influence, planning authorities must apply the requirements of Regulation 61 of The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, to housing development within 5.6km of the SAC boundary. The authority must decide whether a particular proposal, alone or in combination with other plans or projects, would be likely to have a significant effect on the SAC.

Wycombe District Local Plan (Adopted August 2019) Policy BE2 - Hollands Farm, Bourne End and Wooburn states that the development will “provide S106 contributions to mitigate recreational impacts at Burnham Beeches SAC”.

Natural England provided comments to application 21/06215/OUT Hollands Farm on the 10th February 2022 agreeing financial contributions towards improvements at LMLCP in line with the Burnham Beeches SAC Mitigation Document produced by The Environmental Dimension Partnership Ltd (dated February 2022).

However the proposed development is located within the red line boundary for Little Marlow Lakes Country Park and therefore will undermine the mitigation for application 21/06215/OUT. As a result the above application would be likely to have a significant effect on the SAC, either alone or in combination with other plans and projects. In accordance with Regulation 61, before granting planning permission for such a proposal, the planning authority must undertake an appropriate assessment of the implications of the development on the SAC, in light of the site’s conservation objectives. The conservation objectives are to maintain and, where not in favourable condition, to restore, the Atlantic acidophilous beech forest habitat.

Consequently, it is Natural England’s view that the planning authority will not be able to ascertain that this proposed development as it is currently submitted would not adversely affect the integrity of the SAC. In combination with other plans and projects, the development would be likely to contribute to a deterioration of the quality of the habitat by reason of increased access to the site including access for general recreation and dog-walking. There being alternative solutions to the proposal and there being no imperative reasons of overriding public interest to allow the proposal, despite a negative assessment, the proposal will not pass the tests of Regulation 62.

Protected Landscapes

The proposed development is located adjacent to a nationally designated landscape namely Chilterns AONB. Natural England advises that the planning authority uses national and local policies, together with local landscape expertise and information to determine the proposal. The policy and statutory framework to guide your decision and the role of local advice are explained below.

Your decision should be guided by paragraphs 176 and 177 of the National Planning Policy Framework which gives the highest status of protection for the ‘landscape and scenic beauty’ of AONBs and National Parks. For major development proposals paragraph 177 sets

out criteria to determine whether the development should exceptionally be permitted within the designated landscape.

Alongside national policy you should also apply landscape policies set out in your development plan, or appropriate saved policies.

We also advise that you consult the relevant AONB Partnership or Conservation Board. Their knowledge of the site and its wider landscape setting, together with the aims and objectives of the AONB's statutory management plan, will be a valuable contribution to the planning decision. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to this type of development and its capacity to accommodate the proposed development.

The statutory purpose of the AONB is to conserve and enhance the area's natural beauty. You should assess the application carefully as to whether the proposed development would have a significant impact on or harm that statutory purpose. Relevant to this is the duty on public bodies to 'have regard' for that statutory purpose in carrying out their functions (S85 of the Countryside and Rights of Way Act, 2000). The Planning Practice Guidance confirms that this duty also applies to proposals outside the designated area but impacting on its natural beauty.

Chilterns AONB boundary review

The proposed development is located within an area which Natural England is assessing as a boundary variation to the Chilterns Area of Outstanding Natural Beauty (AONB). Whilst this 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.

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

Should the developer wish to explore options for avoiding or mitigating the effects described above with Natural England, we advise they seek advice through our [Discretionary Advice Service](#).

Should the proposal change, please consult us again.

Therefore this development would undermine the proposed mitigation for BE2 - Hollands Farm and result in an adverse impact upon Burnham Beeches SAC. A Habitats Regulations Assessment will be required to assess the impact and identify compensation measures.

Natural England (Habitat Regulations Assessment Comments):

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.

Habitats Regulations Assessment

Based on the information submitted, Natural England are currently not in a position to agree with the conclusion of the Habitats Regulations Assessment (HRA).

Burnham Beeches Special Area of Conservation (SAC):

The proposed development is located within Little Marlow Lakes Country Park (LMLCP), the identified mitigation for Allocation BE2 - Hollands Farm within Wycombe District Local Plan (Adopted August 2019).

Natural England provided comments to application 21/06215/OUT on the 10th February 2022 agreeing financial contributions towards improvements at LMLCP in line with the Burnham Beeches SAC Mitigation Document produced by The Environmental Dimension Partnership Ltd (dated February 2022). Natural England acknowledge that the council are currently in the process of allocating their own land as Suitable Alternative Natural Greenspace (SANG). However this strategy is not yet formally agreed.

The proposed development still has the potential to impact the reduced SANG through visual and noise impacts and therefore has potential for LSE and should be screened into the Appropriate Assessment (AA).

We undertook DAS with the applicant on the 25th September 2022. It was advised that the following measures would need to be secured:

- Sufficient screening on the east boundary to ensure that the development does not detract from the semi-natural feel of the SANG. The screening will be required to be managed in perpetuity (minimum 80 years) to ensure that the development remains well screened in the long term.
- Noise surveys/modelling will be required. The maximum acceptable noise limit on a SANG is 60dB and therefore the development should not be contributing to noise levels above this limit on the adjacent SANG.

South Bucks adopted Core Strategy's Core policy 9 Natural Environment states "where a specific development could result in significant effects on the SAC, a Project level (regulation

48) HRA will need to be carried out by the developer when the planning application is submitted to determine whether mitigation measures are required.”

When there is sufficient scientific uncertainty about the likely effects of the planning application under consideration, the precautionary principle is applied to fully protect the qualifying features of the European Site designated under the Habitats Directive.

Due to new evidence on the impacts of recreational and urban growth at Burnham Beeches SAC carried out by Footprint Ecology in 2019, Natural England recognises that new housing within 5.6km of the internationally designated Burnham Beeches Special Area of Conservation (SAC) can be expected to result in an increase in recreation pressure.

The 5.6km zone proposed within the Adopted Avoidance and Mitigation strategy SPD and evidence base carried out by Footprint Ecology represents the core area around the SAC where increases in the number of residential properties will require Habitats Regulations Assessment. Mitigation measures will be necessary to rule out adverse effects on the integrity of the SAC from the cumulative impacts of development.

Impacts to the SAC as a result of increasing recreation pressure are varied and have long been a concern. These impacts, which have the potential to adversely affect its interest features, include:

- Contamination (e.g. dog fouling, litter, spread of plant pathogens);
- Increased fire risk;
- Trampling/wear (e.g. loss of vegetation, soil compaction, erosion, damage to trees from climbing);
- Harvesting (e.g. fungi, wood);
- Difficulties in managing the site (e.g. maintaining the grazing regime);
- Disturbance (e.g. affecting the distribution of livestock and deer).

In light of the new evidence relating to the recreation impact zone of influence, planning authorities must apply the requirements of Regulation 61 of The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, to housing development within 5.6km of the SAC boundary. The authority must decide whether a particular proposal, alone or in combination with other plans or projects, would be likely to have a significant effect on the SAC. Development in accordance with the adopted South Bucks Core Strategy's Core policy 9 and Adopted Avoidance and Mitigation Strategy SPD would not be likely to have a significant effect on the SAC because they will provide, or make an appropriate contribution to, acceptable avoidance and mitigation measures. The planning authority can grant planning permission to such developments in accordance with the Regulations. However, development proposals which are not in accordance with the above would be likely to have a significant effect on the SAC, either alone or in combination with other plans and projects.

In accordance with Regulation 61, before granting planning permission for such a proposal, the planning authority must undertake an appropriate assessment of the implications of the development on the SAC, in light of the site's conservation objectives. The conservation objectives are to maintain and, where not in favourable condition, to restore, the Atlantic acidophilous beech forest habitat.

Consequently, it is Natural England's view that the planning authority will not be able to ascertain that this proposed development as it is currently submitted would not indirectly adversely affect the integrity of the SAC. In combination with other plans and projects, the

development would be likely to contribute to a deterioration of the quality of the habitat by reason of increased access to the site including access for general recreation and dog-walking. There being alternative solutions to the proposal and there being no imperative reasons of overriding public interest to allow the proposal, despite a negative assessment, the proposal will not pass the tests of Regulation 62.

Chilterns Beechwoods Special Area of Conservation

Natural England notes that the Air Quality assessment provided with the consultation has screened the proposal to check for the likelihood of significant effects from aerial emissions on the Chilterns Beechwoods SAC.

The assessment concludes that the proposal can be screened out from further stages of assessment because significant effects are unlikely to occur, either alone or in combination. On the basis of information provided, Natural England concurs with this view.

Protected Landscapes

The proposed development is located adjacent to a nationally designated landscape namely Chilterns AONB. Natural England advises that the planning authority uses national and local policies, together with local landscape expertise and information to determine the proposal. The policy and statutory framework to guide your decision and the role of local advice are explained below.

Your decision should be guided by paragraphs 176 and 177 of the National Planning Policy Framework which gives the highest status of protection for the 'landscape and scenic beauty' of AONBs and National Parks. For major development proposals paragraph 177 sets out criteria to determine whether the development should exceptionally be permitted within the designated landscape.

Alongside national policy you should also apply landscape policies set out in your development plan, or appropriate saved policies.

We also advise that you consult the relevant AONB Partnership or Conservation Board. Their knowledge of the site and its wider landscape setting, together with the aims and objectives of the AONB's statutory management plan, will be a valuable contribution to the planning decision. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to this type of development and its capacity to accommodate the proposed development.

The statutory purpose of the AONB is to conserve and enhance the area's natural beauty. You should assess the application carefully as to whether the proposed development would have a significant impact on or harm that statutory purpose. Relevant to this is the duty on public bodies to 'have regard' for that statutory purpose in carrying out their functions (S85 of the Countryside and Rights of Way Act, 2000). The Planning Practice Guidance confirms that this duty also applies to proposals outside the designated area but impacting on its natural beauty.

Chilterns AONB boundary review

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.

For more information about the boundary review process, please read these Frequently Asked Questions.

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

Cadent Gas:

No objection from a planning perspective. An informative is requested.

Thames Water:

No comments to make at this time.

Historic England:

No comments to make.

Crime Prevention & Design Advisor (non- statutory):

Having read the Security Needs Assessment produced for this application, I ask that the recommendations set out in the section of the Security Strategy (Points 1 – 26) are required to be met as a condition of planning consent.

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APPENDIX A2: Public Responses Summary

Members of Parliament:

J Morrissey MP (local MP):

Original Comments

The site that is being proposed is open Green Belt land and part of Little Marlow Lakes Country Park. This is exactly the kind of place that makes people want to live in our area to begin with and without which, the quality of life of local people will be substantially impacted. The whole point of Green Belt is to protect sites like this one, if Buckinghamshire Council fails to do so, it will send a clear message to developers that other such sites are worth targeting.

I am particularly concerned that this site has been brought forward despite being part of the Country Park. This land is not only important to local people as an outside green space, but it also directly supports and impacts the neighbouring nature reserve. It has also been identified as mitigation for another development site, Hollands Farm in Bourne End. I have been corresponding with Natural England, who are similarly concerned that development at this site would invalidate mitigation at Hollands Farm.

The area in which this proposed development is sited already struggles with very high volumes of traffic, that the local roads are unable to handle. Experience of studio facilities in other parts of my constituency shows that developments like this generate very high traffic flows which impact surrounding residential areas. The nature of the industry means that very few local people will be employed here and large numbers will commute to the site on a daily basis.

This increased level of traffic would not only impact on the flow of vehicles but also on the air quality of the area. Parts of Marlow are already subject to an Air Quality Management Area, which this development would simply exacerbate.

Very special circumstances is a deliberately high bar to prevent inappropriate development of Green Belt land, this application fails to reach this bar. I hope that this application will be rejected as the obviously unnecessary incursion into the Green Belt that it so clearly is.

Further Comments

I would like to reiterate and reinforce my previous objection to this planning application. The further information submitted with this planning application have failed to address previous concerns in relation to the existing heavy traffic usage in the area.

Experience has shown in other parts of the Beaconsfield constituency that such a development will have significant increases in traffic and will affect residential areas with pollution. It should be noted in the consideration of this application that parts of Marlow are already subject to an Air Quality Management Area.

The very nature of the industry behind this application means that few local people will be employed and large numbers will therefore have to commute to the site on a daily basis.

This planning application is proposed for Green Belt Land, which once lost will never return. Open spaces and the protection of this area are essential for the local wildlife as well as the health and welfare of local residents.

I hope that the Council will listen to the objections that have been lodged and reject this application as it is unnecessary intrusion into the Green Belt.

Amenity Groups & Organisations:

Comments in SUPPORT of the scheme have been received from the 9 x groups and organisations below. Comments made are:

British Film Commission (BFC):

- The British Film Commission (BFC) is the UK Government's national organisation responsible for supporting inward investment film and TV production in the UK, funded by the Department for Digital, Culture, Media and Sport (DCMS) through the BFI and by the Department for International Trade (DIT), with corporate sponsorship from key film and TV clients including HBO, Netflix, Walt Disney Studios, and WarnerBros.
- The global demand for audiovisual content for theatrical release, broadcast and streaming has never been greater.
- UK Government recognises that film and TV studios can increase employment and share spill-over benefits across an area and the supply chain.
- Recent research conducted by Saffery Champness and Nordicity, in relation to film and high-end TV production growth and skills needs in the UK concluded that film and HETV production in the UK is likely to grow at an annual average rate of 7.3% between 2022 and 2025.
- Sector Tax Reliefs are designed to encourage maximum UK-based activity, and are tailored specifically to attract major, high-end projects that require multiple large stages, as well as a campus of associated workshop, office, back-lot and auxiliary space such as those proposed by Marlow Studios.
- The south- east England region benefits from the UK's largest crew base, leading creative talent, iconic locations and cutting-edge production, postproduction, and visual effects facilities, all of which contribute to the area's reputation as one of the best places in the world to produce high-end content.
- Additional stage capacity would provide a considerable boost to make the area a leading destination for major feature film and HETV production.
- Plans to increase capacity in accessible locations are to be welcomed.
- No hesitation in supporting this studio proposal and Planning Application.

Buckinghamshire New University:

- University supports film studio's aim to provide a new global centre for filmmaking.
- Strategic alignment between university and Marlow Film studios.
- BNU is committed to working with Marlow Film Studios to deliver the proposals for the Skills and Cultural Academy and provision of an on-site, dedicated education facility, enabling students to work directly with industry.
- Marlow Film Studios represents a unique opportunity for Buckinghamshire and the UK to gain economically from the opportunities afforded by the film industry, including through the creation of new jobs.
- BNU strongly endorses the Marlow Film Studios commitments to equality, diversity and inclusion.
- BNU would be pleased to work with Marlow Film Studios in delivering their vision of a sustainable studio. Sustainability is of paramount importance to the University, and their plans to increase bio-diversity, use low-carbon construction, work to the BREEAM standard, and plan for a net zero operation are welcomed.

PACT:

- Pact helps businesses to grow domestically and internationally. In order to maximise their businesses' production of major international feature films and high-end TV(HETV), there is a need for new and purpose built facilities to match the global demand and quality.
- The proposed film studios would be of sufficient scale to attract these major films and HETV. Studios would expand the capacity of world-leading clusters of major studios.

Creative England:

- Creative England is a national agency endorsed by the Department for Digital, Culture, Media and Sport (DCMS) and funded by BFI – supports studios.
- Marlow Films Studio proposals respond directly to shortage of studio space in UK that Creative England has seen over the last few years.
- Bucks is located in the super production hub of the South-East of England.
- Proposals support long-term employment and training opportunities for local people in Bucks and surrounding counties – helps to develop a sustainable and diverse workforce.

Buckinghamshire College Group:

- Would be good opportunity for students to work with Film Studios who would be able to support courses on subjects such as VFX, set design etc.
- Strategic alignment between college group and Marlow Film studios.
- Commitment to utilise the proposed Skills and Cultural Academy and provision of an on-site, dedicated education facility, enabling students to work directly with industry.
- Would look to work with film studios to provide on-site education and experiences, working directly with industry professionals.

- BCG strongly endorses the Marlow Film Studios commitments to equality, diversity and inclusion.

-

The Production Guild:

- Marlow Film Studios would be a catalyst for accommodating UK productions. Unique economic and cultural proposition.

Screen Skills:

- Huge demand for studio space
- Localised job creation and employment opportunities
- UKs tax credits and skilled workforce inward investment and created the current production boom

-

Marlow Living Streets Group:

- We fully support the original concepts to improve sustainable access to and around the Marlow Studios site and to promote and encourage active travel.
- Welcome the additional investment in the land north of Spade Oak Lake and long-term commitment from the developers to transform a large area of monocultural arable land for biodiversity offset.
- Has the potential to greatly enhance the adjacent proposed SANG area owned by Buckinghamshire Council for the benefit of the local community and general public.
- Improvements to Local travel and Transport links.
- Upgradable travel routes in vicinity.
- Advised to reject proposed cycle route in favour of an alternative safer and sustainable route away from the high-volume, fast-moving traffic of A4155; this will help establish a significant modal shift away from cars.
- It's hoped that a condition of approval is the funding of a Marlow LCWIP (Local Cycling and Walking Infrastructure Plan) and, in due course, contribution towards the associated improvements to active travel connectivity that are identified.
- Further collaboration with the Globe Park BID for an ebike/scooter share scheme between the two areas will greatly increase potential for micro-mobility connectivity and therefore increase commuting by train to the site.
- Advocate for BOTH an upgraded bridge and the Fieldhouse Lane PRoW link be constructed.
- This development could have long-term strategic value for the district as a whole in relation to active travel investment.

Buckinghamshire Business First:

- Buckinghamshire Business First (BBF) is recognised by both the Department for Business and Trade (formerly BEIS) and the Department for Levelling up, Housing & Communities (DLUCH) as the Growth Hub for Buckinghamshire and we provide businesses in Buckinghamshire with knowledge, support and opportunities for growth. We have also been appointed by the Department for Education as the

Employer Representative Body (ERB) for Buckinghamshire and we are leading on the development of the Local Skills Improvement Plan.

- BBF considers that the application delivers significant benefits, meets the clear need for more film and television facilities as the UK continues to be one of Hollywood's preferred destinations for filming big budget feature films, and further grows a sector which Buckinghamshire leads on both nationally and internationally helping achieve local and national government policy objectives.
- BBF is particularly interested in the education and skills commitments which will provide significant opportunities for the younger generation to gain the skills, knowledge, and experience necessary to support a future career in the creative industries.
- The proposal will also broaden existing supply chains in the county that support the Creative Industries sector.
- The film studio application will be a major catalyst to making sustainable public transport options more accessible for the surrounding communities.
- Local residents will benefit from the proposal.

Marlow Film Studios Advisory Council:

(Officer note: This is a panel of advisors providing informal guidance and feedback to the applicants on key policies, industry trends and plans. Buckinghamshire Council is not involved.)

- International competitors envy success and want to draw investment away. We must not be complacent.
- Believe Marlow Film Studios will deliver impressive benefits to the long-term success of the film and high-end television industry in Buckinghamshire, and to the consequent livelihood and productivity.
- Project is based on sound principles of sustainable development.
- More than half of the land involved will be secured exclusively for wildlife, training and culture or quiet recreation for the local community.
- There will be road improvements and two new public bus services
- There will be economic benefits over generations.

Comments OBJECTING to the scheme have been received from the 19 x groups and organisations below. Comments made are:

Berks, Bucks & Oxon Wildlife Trust (BBOWT):

- Impacts on Marlow Gravel Pits Biological Notification Site, Thames Valley Local Biodiversity Opportunity Area.
- Development within Green Belt
- Impacts on Burnham Beeches Special Area of Conservation as a result of the undermining of mitigation for Allocation BE2- Hollands Farm
- Errors and omissions in the biodiversity gain metric and insufficient evidence to support biodiversity net gain.
- Open Mosaic Habitat on previously developed land, a priority habitat, may be present and impacted
- Impacts on Marlow Gravel Pits Biological Notification Site and Thames Valley Local Biodiversity Opportunity Area, and development within Green Belt.

National Trust:

- Adversely affect views from 'Winter Hill'.
- Requires more on-site screen planting particularly on the south side.
- Consideration should be given to the inclusion of strategically sited offsite screen planting between the site and Winter Hill.
- Urges importance of maintaining strategic gap, free of development, between Marlow and Bourne End. Concerns of urban sprawl.

Campaign to Protect Rural England (CPRE):

- Business case for this proposal has not been demonstrated.
- Detrimental to mental health.
- Biodiversity claims are exaggerated and carbon emission figures have been strategically worded to avoid obvious issues.
- Application has consequences that could make the entire Local Plan open to challenge and speculative, uncontrolled development.
- Application is recorded as a delegated decision. Should it not go to committee/strategic committee?

Open Spaces Society:

- The Open Spaces Society is Britain's oldest national conservation body.
- Application will have a severely detrimental impact on the landscape of the Chilterns Area of Outstanding Natural Beauty and people's enjoyment of it.
- People's enjoyment of Little Marlow footpath 4, and other public rights of way in the area, will be destroyed.
- This industrial-sized development is totally out of keeping with the surroundings.

Ramblers Bucks:

- Ignores public rights of way.
- Detrimental wildlife impact

Chiltern Society:

- Non compliance with Green Belt policies etc. No very special circumstances to override Green Belt policy.
- Off-site BNG not offsetting harm to existing park
- Proposal is purely theoretical
- It would have significant adverse impacts in relation to landscape, biodiversity, and traffic.
- The evidence of need for a studio development of this size is questionable (and even more questionable now, given recent permissions and additional proposals that have emerged since 2022), and the site selection process flawed.
- Any economic and social benefits that might arise could be equally or better delivered on other sites.
- Essential that the full promised bus services are introduced at the outset, ahead of demand (contrary to what is indicated in the submitted material, which imply only a gradual ramp-up of service levels), so that "good" travel habits become ingrained, and alternative "bad" ones don't.
- Off-site measures to try to overcome and offset the major on-site biodiversity damage still remain hugely uncertain.

Marlow Society:

- Green Belt concerns.
- Siting concerns.
- Heritage concerns.
- Transport concerns.
- Environment concerns.
- Would impact on Country Park.
- Transport capacity issues.
- Lack of very special circumstances.
- Cycling and pedestrian issues.
- Out of date social/economic data.
- No need for development.
- Doesn't meet 'levelling up criteria'
- Amended traffic proposal not supported.
- The suggested public transport proposals are not believable.
- There are no proposals to address the Environment Agency 's concerns.
- The replicated messages in support of the Studios come from all corners of the country and do not recognise any of the realities of the proposal.

Cookham Society:

- Development will impact view over the site from Winter Hill.
- Topic Paper 4: Transport prepared by WDC and BCC in October 2017 for the Local Plan noted in para 4.37 that Cookham Bridge was already over capacity and that housing allocations for the Bourne End area would exacerbate existing congestion.
- RBWM's Local Plan has substantial housing allocations on north side of Maidenhead and in Cookham.
- Transport Assessment needs to look at impact of development on A4155 and Cookham Bridge.
- Flood Risk Assessment is based on Buckinghamshire side of Thames and does not refer to Cookham where there is regular flooding in Cookham Village.
- Scheme is substantial development and is inappropriate in the Green Belt
- Development would introduce urban sprawl into an area of open countryside
- The size of the new studio buildings will be a stark intrusion
- The orientation of the PV panels is not considered to prevent glare
- Assessment does not include the impact of the development on Quarry woods which is part of the Chiltern Beechwoods Special Area of Conservation – material consideration
- Inadequate consideration to impact of increased traffic on local roads
- List of five locations are reasonably close and does not look at the wider demand for expansion in places such as Elstree – does not warrant very special circumstances

Chilterns Conservation Board:

- The application is harmful to the landscape setting of this part of the AONB including views from Winter Hill. The application does not satisfy para 176 of the NPPF as it is not sensitively located. Applicant's own LVIA notes that it cannot mitigate these visual impacts to a meaningful degree.
- AONB Management plan is a material consideration.
- Site near Chiltern and Burnham Beechwoods SAC. Need to reduce pollution and trip generations near the SACs.
- The application falls within a candidate area for the AONB's boundary extension.
- Section 85 of the CROW act sets out to conserve and enhance nationally protected landscapes.

Wild Marlow:

- Contravening Local and National Policies.
- Insufficient Biodiversity Net Gain Onsite.
- Adverse impacts from lighting, noise etc.
- Specific ecological constraints haven't been adequately covered: Otter, barn owls, pyramidal orchids, bats stonewort and badgers
- Council must still be committed to extending the Country Park area in due course. Ecological mitigation should not be allowed off site. Spade Oak Lake Nature Reserve is not a suitable SANG for multiple large developments. No additional information included regarding ecological impacts of outdoor filming activities – temporary activity is not sufficient to neglect this. No additional information put forward regarding dusk breeding bird surveys. Otters highly likely to inhabit the site.

Interspersed scrub and ephemeral vegetation in plot 4 has ecological importance including orchid assemblage. Bats present on site. Insufficient evidence to assess ecological impacts on Westhorpe Lake. Information on badgers confirms 30 metre buffer with no detail on how this will be done. Reptile survey insufficient. BNG loss is somehow less than previous calculations despite being conducted as unsuitable time.

- Supports additional comments submitted by Chiltern Society and BC ecologist
- Claims of 20% BNG remain vague and suggested rather than a guaranteed commitment
- The downplaying of the existing value of the site and the proposed change to an off site single arable field is unacceptable without establishing accurate baseline data through surveying ensures existing habitats and species are not negatively impacted
- The presence of water vole was considered unlikely though the site is considered to offer suitable habitat. Site is linked to waterbodies and courses and suitable terrestrial habitat to the River Thames and Spade Oak Local Nature Reserve that have anecdotal records of water vole activity.
- A foraging badger has been spotted at the site – grid ref SU 86555 87465. Insufficient mitigation considered for loss of suitable foraging habitat and free movement across the site.
- Additional addendum documents do not provide appropriate solutions and sufficient proposals

Little Marlow Residents Association:

- Protect green belt.
- Previous applications (athletics stadium and Hollands Farm) never delivered on mitigation. Lack of other brownfield locations.
- Adding to traffic.
- Tax evading company.
- Deteriorating air quality.
- Increased chance of flooding.
- Rights of way threatened.
- Sewage treatment already overstretched.
- Contrasts planning policies.
- Amended traffic plan not sufficient.
- LSH report does not support 'very special circumstances' to override green belt. Sufficient studio capacity in the pipeline.
- Sequential tests are flawed.
- Would reduce biodiversity, not increase it. Off-site biodiversity cannot be guaranteed.
- Dido Property Ltd are defined as property developers and not a film studio
- Sunset studios halted £600million studio at Broxbourne due to market concerns.
- Baseline data for biodiversity is incorrect and inaccurate mitigation information.
- Potential to paralyse the Strategic Road Network
- Would be an inappropriate gateway into Marlow.
- Economic case is even weaker with paused construction of Waltham Cross Studios.
- Contrary to RUR4 Country Park policy.

Bucks Bird Club:

- The proposal goes against the site's designation as a Country Park.
- The seven lakes within the Country Park area form a central part of an important and valuable wetland corridor along the Thames valley through Buckinghamshire and Berkshire. They provide important refuges, breeding and feeding opportunities both for wildfowl, wading birds and a wide range of other migrating wetland species, such as Ospreys, Spoonbills, Egrets, Terns and Gulls.
- Birds of prey such as the scarce Hobby regularly hunt over the lakes and surrounding areas in the summer months.

Save Marlow's Green Belt:

- Contrary to green belt policy and its fundamental aim.
- Unacceptable impact on highway safety and that the residual cumulative impact on the road network would be severe.
- Harm to the AONB
- Harm to the allocation within the recently adopted Local Plan for the Little Marlow Lakes Country Park.
- Fails to demonstrate a deliverable strategy to achieve a net gain in biodiversity.
- Harm to the visual amenities to users of right of way.
- The development is unsustainable in transportation terms.
- Does not demonstrate that safe and suitable access can be achieved.
- The residual cumulative impacts of the Proposed Development cannot be drawn as the assessment is flawed.
- 'Very special circumstances' have not been advanced by the Applicant and planning permission should be refused
- The development's harm to the Green Belt does not outweigh its benefits.
- There is no justification for the selection of the proposed site.
- The increased traffic will disrupt and endanger people's lives and increase pollution.
- The development will damage the environment and harm the visual amenity and character of the area.

Transition Town Marlow:

- Charitable objectives state "to advance the conservation, protection and improvement of the natural environment and the prudent use of natural resources for the benefit of the population in Marlow, Buckinghamshire"
- Land is green belt and a Country Park as per 2019 Local Plan (RUR4). Borders Chilterns AONB
- Already high employment and low vacancy rates.
- Biodiversity Net loss.
- Existing Rights of Way issues.
- Buildings 22metres high will impact views from miles around.
- It is not sustainable construction in practise.

- Sustainable transport plan is unrealistic – more than double the current flow of the A4155 and HGVs not accounted for.
- Entrance junction relies on land outside developer's control.
- More congestion, pollution and irreversible damage to natural environment.
- Amendments fail to address previous concerns.

Transition Marlow (Walking & Cycling):

- Does not have 'very special circumstances'.
- Transport issues and impact on local environment.
- Sustainable Transport Strategy unreasonable.
- New roundabout not compliant with LTN1/20 and not cycle-friendly.
- No assistance for crossing A4155.
- No improvement to shared Northern shared-use path.
- No clear cycling provisions for approaching roundabout and no protection from traffic.
- Bisham roundabout is already known to be hazardous and another similar roundabout should be avoided.
- No reduction in speed limits, off road cycling or active travel provisions have been provided.

Little Marlow Lakes Country Park Community Partnership (LMLCPCP):

- Revised site access poses more traffic issues.
- Directly contradicts existing green belt policy. Extends the urbanisation of Marlow into the open countryside.
- Directly contradicts Local Plan policy RUR4 and Country Park Status.
- Pre-empt matters that should be appropriately considered though the Buckinghamshire Local Plan Review

Middle Thames Bird Conservation Trust:

- Whilst the Environmental Statement recognizes the negative impact this development would have on local Biodiversity, "Table 14.8: Specially Protected and Otherwise Notable Species" omits to record the presence of Barn Owl, a species specially protected under Schedule 1 of the Wildlife and Countryside Act. There are two Barn Owl nest boxes located on adjacent land, one of which is within 150m of the affected site. These boxes have been used regularly by Barn Owls for nesting since 2014, successfully fledging 24 young during that time. These birds hunt over the rough grassland to find their prey. The destruction of this habitat will almost certainly lead to the loss of these iconic birds from this site.

Wild Cookham:

- Contrary to national planning policies.
- Not very special circumstances.
- Biodiversity gain claimed has limits and isn't sufficient in practise.

- Noise, light and vibration pollution (highlighted by EIA)

Wycombe Wildlife Group:

- Contrary to RUR4 WDC Local Plan. Set to become country park.

Other Representations

3262 representations (including 2592 support letters with replicated text) have been received supporting the proposal.

2313 representations have been received objecting to the proposal.

23 letters of representation have been received with miscellaneous comments.

All comments are summarised below:

Comments SUPPORTING the scheme:

Highways	<ul style="list-style-type: none">• Upgrades to cycle and pedestrian infrastructure• Developer will have opportunity to pay for local road improvements and park & ride car park• Sustainable transport• Parking availability needs to be sufficient and security should be controlling traffic in the car park• Should be able to improve transport links• M4, M40 so close and close to Major Airports leading to ease of access• Transport routes will benefit the community• Transport hub will be a catalyst to making sustainable and public transport options more accessible for the surrounding communities• New funds could be used to repair roads and increase local services• Cycle routes from the development site to High Wycombe or Bourne End would be good, but excellent connections to Marlow, right next door, are essential.• The Volvo Bridge should be replaced with a subway for the shared use of pedestrians and cyclists, running under both the A404 and Parkway, if considerations like flooding allow. This would create a safe, level and direct route between the development site and Marlow, including Marlow rail station and could limit car trips by encouraging more active transport• An “active travel highway” should be created running west from the site of the Volvo Bridge to Marlow town centre at Liston Gardens and/or Institute Road• Application has been amended and further improved to include public transport and cycling addendum• Bus route appears positive although unclear how beneficial due to lack of timetable.
Landscaping	<ul style="list-style-type: none">• land is currently derelict and wasteful• Less than 5% of land surface is built up so not too impactful

	<ul style="list-style-type: none"> • Environmental plan could enhance areas that are currently landfill and not very diverse • Landscaping proposals are an improvement on existing and maintained by internal funding stream
Green Belt	<ul style="list-style-type: none"> • Very special circumstances are justified • 'Green Belt' is a 1930s concept designed to prevent countryside development and must be more flexible • Site cannot be used for any alternative revenue generating purpose • 500 Acres of studio space already approved to be developed by 2025 • Economic and community benefits meets very special circumstances
Impact on neighbours and community	<ul style="list-style-type: none"> • Associated opportunities to benefit Marlow and Bourne End • New facilities including a new transport hub • Will create a new economic and cultural hub • Proposed community building is welcomed • Investment in local businesses and opportunities for young people, especially from the proposed Culture and Skills Academy • Not many studios in the south east • Many film and TV workers live locally due to local studios so they will have less of a commute and will be able to benefit from local childcare facilities and health and fitness facilities to be provided • Local facilities and job opportunities will reduce commute • 25% of the site being used for public enjoyment and wildlife • Nearby film schools and courses can offer work experience in the locality • Council will benefit from business rates which will benefit the local residents • Looking to offer scholarships to local schools • Green development proposals will enhance local area and acts as an educational hub for screen skills development • Stone street studios in Miramar – New Zealand – parallels Marlow and proves how successful a film studio can be to the local community. • Film industry creates jobs across multiple avenues which Marlow's high street can fully capitalise on – Dressmakers, Jewellers etc. • TV provides stable, long term work which attracts residents and professionals who settle down in Marlow and help grow the community • In Wellington, long term productions resulted in decades of rejuvenation projects proving the local benefits • Would be good if there were more football/sports facilities next to the running track for kids

	<ul style="list-style-type: none"> • Locals in the industry already commute and having facility nearby enables a better work/life balance
Scale of development	<ul style="list-style-type: none"> • Viable development • Application will put wasted land into good use • Industry needs support • Need more world-class studio facilities like this in the county • Encourage growth and expansion in Marlow • Adds to the co-location priorities of the West London Cluster • Development would be fit for purpose.
Environmental Impact	<ul style="list-style-type: none"> • Improvements can be made to the natural environment • Reduction in sound pollution from A404 • Creating a space for wildlife • 20% biodiversity net gain • 25% of site to be used for public enjoyment and additional offsite interventions • Low environmental impacts (Film and TV industry provide much less carbon footprint in comparison to the sale of manufactured goods) • Makes provision for the enhanced enjoyment of the natural environment by local residents • Site would be more green • Contradicts Biodiversity Action Plan for Bucks for 2030
Other	<ul style="list-style-type: none"> • Trains need to be improved • Seize the opportunity of the current popularity of streaming services • Studio space is at an all-time high for demand – one of few industries generating growth for stalled post-Brexit economy • Around two-thirds of the production budget are to be spent in the local economy • Film industry increased financial turnover annually and refusal of this application will forfeit the benefits to other locations instead • \$338m boost every year into economy, local business and supply chain • Skills shortage in current film and television industry • Gives Marlow creditable acclaim on the world stage of international film making • There is demand for more film studio space • SMG independent specialist consultant is bias and should be ignored

Comments OBJECTING to the scheme

<p>Highways and access to the site</p>	<ul style="list-style-type: none"> • Road Infrastructure in Marlow is inadequate • Traffic will increase on A404 and A4155, M40 which will impact the local area and cause problems at rush hour • Increase in traffic could reduce road safety and lead to more collisions and accidents • Need for those car travel to the site is more likely to be 80-90% rather than the 40% suggested in the traffic plans due to workers need to carry equipment etc • How will the remaining 60% travel in? Trains are not frequent enough to support studio and road infrastructure will not be able to support coach/bus transfers from the station to the site • Car free cycle routes connecting local towns should automatically be part of any new future development. Developers should fund the purchase piece of land to facilitate this • Parking is already an issue in Marlow • Towpath towards Henley is congested/narrow and all other routes are fast roads or up steep hills • More cars on the road will lead to congestion and discourage cycling • No more buses are needed as they are hardly used • Proposed traffic lights could cause long tailbacks from the Bourne End direction • Massive redesign of the A404 / A4155 interchange would be required along with redesign of the Bisham roundabout and the major Handy cross interchange • Cycle Lane proposed is not sufficient and needs increasing all the way into Marlow and Bourne end to make it worthwhile • Existing rights of way will suffer or will be removed. • Cycling routes from the Westhorpe Interchange to Sheepridge Lane are unsafe and forces cyclists to cross a busy 40mph road in Little Marlow. Cyclists at Lane End have to use main carriageway through to Bourne End which leads to much unsafe car overtaking. • Local traffic to Westhorpe Park, the athletics track and Garden Centre will have access problems and deter cyclists • Traffic around Marlow, Bourne End, Cookham and Maidenhead is already very heavy at peak times and bridges crossing the river namely the Marlow bridge, Ferry bridge (Cookham) and Henley bridge continue to get busier with more hold ups • The cross roads to access the studio site are too close to the Westhorpe Roundabout and will bring traffic to a standstill every time the lights turn red on the eastbound side of the carriageway • Will create additional traffic of large vehicles
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	<ul style="list-style-type: none"> • Will create further traffic on top of the increased traffic flow that will come from the housing developments at Abbey Barn Lane and on top of existing traffic at the Handy Cross roundabout • Lots of traffic already in Marlow, especially in the summer • The roundabout is already operating at, or above capacity, with high levels of congestion. Delays are expected along this section of the A404 on a daily basis • Will lead to an increase of cycling and pedestrian accidents • Applicant has not included the estimate of tourism traffic into their transport plan • Proposed cycle path redesign on the A4155 will not benefit local people much unless it is extended all the way along the A4155. The proposed junction layout is designed for HGVs and covers redesign on private land not owned by the applicant. • Figures used for Transport Assessment are not accurate as traffic usage assessments were completed near the end of the pandemic and during the holiday season. One of the trip wires had also been loosened. • An additional 4000+ vehicles will worsen air pollution problems in Marlow • Increased traffic will exacerbate the already endemic speeding problems • Second roundabout will not change the fact that the Westhorpe roundabout (at junction of A404 and A4155) will not be able to accommodate the additional traffic (2000 cars) from the studio • Second roundabout would be too close to the main roundabout • Bus route/stop would move to top of lane instead of by bottom car park by homestead which is more convenient • Plans for public transport are not credible • Amended traffic plan does not address concerns raised from National Highways • The proposed amendments to access in the form of a roundabout will further impair the passage of those travelling by bicycle and foot • National Highways yet to be provided with modelling information • New plans show access used by Westhorpe House residents will also be used by studios which will lead to access and traffic issues for the residents (Westhorpe House has 33 residents) • Shuttle Bus impractical and won't be used due to congestion caused by employees • Studio plans for 40% max car parking whereas the realistic figure is between 80-90% causing havoc on the roads • Proposed changes do not account for the highly congested A404 junction with A4155. Need for additional parking restrictions and plans to widen A4155 will be re-addressed
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	<ul style="list-style-type: none"> • Funding will not be secured to guarantee promised benefits ie who is to maintain the cycleway • No safe crossings on proposed on amended plans and unclear speed limits • The transport plans have been assessed by an independent consultant and confirms National Highways objections that the proposal would result in an unacceptable impact on highway safety and overall the application site is unsustainable in transportation terms thereby failing to meet the requirements of paragraphs 105 and 110 (a) of the NPPF. • The amended proposed traffic control plans do not sufficiently deal with the volume of vehicles that would be travelling to and from the site. Further travel time will have an impact on Westhorpe House (vulnerable and elderly residents) • The cycling and walking proposals from the 3rd July – the only safe cycling option is delivering a private access for the film studio employees and users via one route which is very indirect for many. • Sustainable transport strategy – part 3 shoes 88% of workers drive to the site and the project aims to mode shift to give a max of 60% arriving by car and rest by public transport and active travel. However, public transport infrastructure is not in place and existing options are very poor/infrequent. • 3 cycle routes – A) via fieldhouse lane should not be the only safe active travel route to the site, B) via the volvo bridge is a steep bridge for pedestrians and cyclists. MFS in discussion with National Highways to upgrade footbridge to enable cycling and provide step free access. But MFS would only progress if Fieldhouse Lane route was not possible. C) Via Westhorpe roundabout – large investment for planned vehicular traffic rather than active travel at the roundabout. If fieldhouse lane option was not to progress, MFS could create pedestrian crossings at northern slip arms of the junction. But MFS has not discussed his with National Highways or BC so questionable as to likeliness of happening. Raising the northern parapet of the roundabout bridge is suggested to enable cycling on shared use path but National Highways have not been prepared to make the investment in the past. • It is incorrect that Bucks CC requested the signalised access junction to be replaced with a roundabout as they only indicated the signalised junction would be unacceptable • BC highways concluded that the proposed use to the Handy Cross P&R site to provide offsite designated permanent parking provision would be unacceptable. The under estimation of number of private cars driving to the site means insufficient car parking has been provided.
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	<ul style="list-style-type: none"> • The amendments do not address the underlying issue of additional traffic • Traffic flow survey based on June 2021 where there was reduced amount of traffic • Transport assessment not sufficient to calculate impact of additional traffic • Highways have commented that the proposed pedestrian access would be unacceptable and have recommended the application be refused • Proposal would further exacerbate traffic with lane closures on the A404 • National Highways comments on 9th October show that baseline assumptions for traffic are highly ambitious and therefore the traffic position will be worse than predicted by the developer's modelling • Concerns of traffic impact on emergency vehicles at Westhorpe Interchange
Landscaping	<ul style="list-style-type: none"> • Out of keeping with natural rural landscape • Appearance of the site in the wider landscape needs to be considered. The site sits in the centre of a meandering stretch of the River Thames between Henley and Maidenhead overlooked by the steeply rising ground along much of its length, from Cliveden in the East past Winter Hill and Quarry Wood near Marlow and on to Remenham and Henley • BC Urban Designer and Landscape Architect has commented that whilst the restoration of the area from its quarrying and landfilling past has not been fully executed, it is a green and unbuilt landscape. The value of the site as a landscape resource is understated by the applicant. Several of the proposed swales and SuDS basins would encroach onto the proposed landscape buffers.
Green Belt	<ul style="list-style-type: none"> • Development should not be allowed in the Green Belt as it can lead to urban sprawl, will lead to ribbon development • Will lead to a precedent of urban sprawl • The land provides an important separation between local villages • Unused brownfield sites could be used instead • Too much destruction of Green Belt • Will go against policy RUR4 of the 2019 Local Plan as land is designated as Green Belt • The development would breach the condition which states that any development in this area should be limited to plans "associated with outdoor sport and recreation, as long as it preserves the openness of the green belt..." (RUR4, 5.5.19) • Will go against NPPF which demands protection of Green Belt from inappropriate development

	<ul style="list-style-type: none"> • Benefits of employment and provision of shuttle bus will not outweigh harm to the Green Belt • Applicant does not show very special circumstances for releasing Green Belt land • The site serves as a Green Belt mitigation for the housing provision of 500 homes in Bourne End • Opens floodgates for uncontrolled development as a precedent for overruling Green belt rules • Lack of clarity on compensatory improvements from taking site out of the Green Belt • Green Belt land is important for food production, flood • Prevention and climate change mitigation • The Green Belt divides Marlow and Little Marlow • It contributes to the beautiful historic setting of both Marlow as a town and the conservation area of Little Marlow village • Judicial Precedent – Sefton Metropolitan Borough Council v Secretary of State for Housing, Communities and Local Government and Doherty [2021] EWHC 1082 • Goes against policies: <ul style="list-style-type: none"> - NPPF – Section 13, Para 137, 138, 147, 149, Section 12 - Building for Life – Section 1, Section 5, Section 6, Section 9 , Para 104 - National Design Guide – Section C1, I1 - Wycombe Local Plan – CP2; Policy CP3; Policy CP5; Policy CP8; Policy DM32; Policy DM35; Policy DM42 • Amendments don't change the fact the site is on Green Belt land • Amendments still contradicts all 5 reasons for special circumstances as per the NPPF para 138 • Adding amenities does not overcome its primary objection of being major development in the Green Belt
Impact on neighbours and community	<ul style="list-style-type: none"> • Development will be damaging to residents who currently live in a green area • Residents at Westhorpe House and the mobile home park, many of whom are elderly would be detrimentally impacted • Loss of country park and a green space • View from house will be of multi storey car park and/or high shed • Using footpaths/cycle paths adjacent to the site will no longer be enjoyable • Plans ignore public rights of way including from Volvo Bridge across the site • Detrimental impact to view from Winter Hill • Jobs will not be for locals as specialist staff are usually needed and television crews usually bring their own catering staff • Noise during construction will negatively impact quality of life for 7 days a week

	<ul style="list-style-type: none"> • Detrimental to mental wellbeing • Loss of unique business and safe environment • Employment figures will never be met – especially by locals • For example, Star Wars Temporary set – no locals seemed to be involved • Light pollution • Could discourage people from using the Spade Oak Gravel Pit • Local businesses, cafes, shops will not benefit from proposal • Data around estimated 2490 construction jobs on average is inaccurate • Increased congestion from development will impact parents taking their children to schools in Little Marlow • Will result in permanent loss of amenity • The impact on the residents of the Westhorpe Mobile Home Park many of whom are elderly is likely to be very disruptive and will completely change their living environment in an adverse manner. • Jobs will be taken up by freelance workers from outside the area • There are already not enough spaces in local schools and doctors surgeries • Loss of nature and scenic views will impact tourism • Marlow already struggles to fill vacant positions and there is no shortage of jobs in the local area • Overall net loss of local jobs as Globe Park would become less attractive to business • Certain communities will become trapped by the development having to fight off the studio traffic just to gain access to their homes • Apprenticeships – Existing workforce in creative industries already struggles to find employment and doesn't need more competition • Heavy rain in the town centre makes the pavements unsafe and having more people will worsen this • Area radius for creation of jobs is not clear i.e. jobs created within 5 miles radius of development? • Site is occasionally used by some travellers so they will be displaced elsewhere • Site would be better used as a green space for leisure activities • Economic report confirms there would be no major economic benefit to the town • Residents of West Thorpe Parks homes will be engulfed by development • Site would be better used as a concert hall/arts building for locals to benefit from
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<p>Scale of development</p>	<ul style="list-style-type: none"> • Development is of an industrial scale • Not viable – future of film industry is uncertain • Is there a need for another film studio with companies such as Disney and Netflix scaling back production • Not clear how whole site will be used for filming purposes • Application is being used to claim land for housing • Large scale of development – very close in proximity to local people which will impact quality of life • Site is not suited for commercial development • Sequential assessment (Ref: Marlow Film Studio – Document 4 – April 2022, section 4) identifies that the selection criteria for a suitable site was of it having an available area of 33ha which appears to be based on a single storey development with no consideration given to a development being built on a multi-storey basis. • The case made in the Environmental Statement Vol 1. 1.17- 1.19 for the ‘Need for Redevelopment’ is contradicted by changes in the market since 2019 i.e. the increase in film studio capacity locally and nationally • Multiple aircraft/warehouse hanger type buildings 18 metres high and multi-storey car parks look out of place in the Green Belt • Development will encroach on small area around Spade Oak and land bordering A4155 • Does not contribute to the green economy • Site is designated as a Country Park to be conserved in the Local Plan • Previous PR information indicated the site would be open plan however, the proposed 2.4-3m security fence would create a corridor to access Westhorpe House • Sheer size and height of development will dominate Marlow • The granting of a temporary license for a studio seems to now be being used as a lever to install a massive facility • Community hub is located at rear end of site next to Westhorpe Park with poor access by car or public transport • Buildings at the site would be rented out as empty units with equipment installed therefore it is not a studio • Build will be low quality and not well maintained in the long run • Site is located within tier 2 of policy CP3 settlement strategy and this scale of development is restricted by the policy • Policy CP5 – the site is not an allocated employment site • Development contrary to policies DM32 and DM35 as it will have an adverse impact on the setting of the AONB • Previous applications at the site have been refused • Country Park should be used for the benefit of the local community and not for commercial use
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	<ul style="list-style-type: none"> • The area has good levels of employment. The development should be located in an area where there is low employment • No 3D plans have been submitted to illustrate size and height of buildings • Site does not blend in well with the area, does not have a rural fee to the design • Blank walls/elevations will face neighbouring properties • Economic analysis performed by LSH on behalf of the Council states that there is sufficient studio capacity in the pipeline, the proposed scale is unnecessary and the requirement of the West London Cluster is overstated. • 'sequential test' is flawed and just a method to prove Dido Property Limited land is most preferable • Requirement of West London cluster overstated • Economic case for the studio has not been made • 42 Applications for extensions or new film studios in UK. Hollywood USA manages to operate within existing studio space so why can't UK • No details submitted about height of fencing or the lights
Environmental Impact	<ul style="list-style-type: none"> • Site was identified as a contaminated site in previous planning applications, soil disturbance could lead to the release of pollutants • The 'biodiversity net gain' does not address the impact of displacing existing animals and wildlife • Destruction of wildlife and habitats/natural environment including broadleaf woodland, not good for carbon emissions and climate change implications • Development can contribute to flooding as ground/trees is to be replaced with tarmac/concrete • Drainage measures to be put in place will not significantly reduce flooding, including surface water flooding into the small streams in the area • Development will worsen air quality including commuters travelling by car or bus/coach • Increased noise pollution • Lack of sewage capacity in the area could lead to overflow/discharge into the River Thames • Destruction of trees, animals and environment for future generations • Contradicting governmental efforts to reach net carbon zero • Night filming very detrimental to nocturnal species • Tree screening won't be beneficial for years • Biodiversity and Geological Conservation statement and Habitats Regulations Assessment ignores the impact on land or water sites occupied by birds and other wildlife near the proposed

	<p>development which are not currently identified as 'European Sites' such as the Spade Oak reservoir.</p> <ul style="list-style-type: none"> • The site was designated as a Country Park initially by the Council, there is an already existing lake with biodiversity present to include migrating birds, bats and barn owls in the local area. • Increase of car exhaust gas increases air pollution which in turn triggers acid rain • UK Butterfly Monitoring Service have seen a sever lack of butterfly numbers which will only increase – insect falls = failed crops and lack of pollination • Developer’s claim that development is net zero do not factor in the carbon costs throughout the studios’ construction, in both local and regional contexts including from construction vehicles and reliance on the electricity grids • Removal of Marlow Country Park is likely to have a negative effect on Spade Oak Country Park as the two areas exist as an one extended habitat • Our country has lost 97% of its wildflower meadows since the Second World War and we rank amongst the most nature deprived countries in Europe; for example with only 13% forest cover (only behind Ireland in this respect). Development will lead to a loss of a nature sanctuary. • Surface water attenuation will cause flooding. • Site is a flood plain. Recent flooding prevention measures will have not considered the impact of this development • 1 in 8 species can be lost due to the destruction of biodiversity and this proposal could contribute further to that • Annual increase in hosepipe bans shows the increase risk of droughts and a large development site will only be detrimental to the local community in that regard • Marlow's air quality is officially dangerous to people with asthma and will only get worsened by this development • Littering on the A4155 (Well End – Little Marlow) already absolute mess that will only be made worse with more commuters • No information provided regarding checking for the presence of toxic materials at the gravel pits and looking into the impact of pile driving and ground works where the ground has been undisturbed for many years • The Country Park and Green Belt is a floodplain where there is a chance of 1 in 50 or 1 in 100 floods a year. Building on this land could lead to flooding to housing in Bourne End, Little Marlow and Marlow. • Site would be used as a wetlands with well-designed visitor access. Brockholes in Lancashire was a former gravel pit that has been landscaped into wetlands
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	<ul style="list-style-type: none"> • Developers do not have a plan for on-site or off-site mitigation for loss of fauna and flora • Marlow Environmental Performance Index 2022 states that, "Overall, Marlow's environmental performance is less good than the national average on eight out of the Index's 11 indicators. The number of indicators showing a deterioration in the latest reported year increased from one previously to four this year. Any large-scale developments would make this worse. • The local ecosphere could support nightingales which are in existential decline. • Many species of wildlife and birds with kestrels, grey heron, Kingfishers and polecats are seen at the site. These are protected in the UK under the Wildlife and Countryside Act, 1981 and are a Priority Species under the UK Post-2010 Biodiversity Framework. • Objection by Environment Agency needs to be heeded as stuff has previously been dumped there • Amended plans have extended the red line boundary and seek to destroy more trees including mature poplars which characterise the rural landscape to the east of the A404 • Marlow and Little Marlow will essentially be joined • Deep foundations may pose a big risk to ground water sources and aquifers • Amendments will result in a huge loss of trees and concreting over landscapes • Latest planning statement addendum dated 6th July from arrow planning appendices includes reference to the Westhorpe Watercourse which is seen as a standing body of water/pond. The watercourse includes output from the Newt Ditch and forms part of the Council's flood alleviation scheme. This project has been delayed over a long period and once completed, it would ensure a small flow which will be amplified at peak rainfall along the watercourse. The assessment is therefore only correct as a result of the delay in implementing the project and there appears to be no reference of this in any of the documents. • The ecological assessment is full of errors as detailed by the Council's ecology officer's report. It considers a single field conversion sufficient to offset the loss of 90 acres of wildlife habitat • Dido statistics are spurious and selectively chosen in regards to net gain • Biodiversity Net Gain off-site to the fatal detriment of the existing country park • Biodiversity claims a single field can replace 90 acres of Green • The solar panel green roofs would not be a suitable mitigation for the loss of ground nesting bird habitat • Baseline data for biodiversity net gain calculations are inaccurate
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	<ul style="list-style-type: none"> • Mandatory mitigation hierarchy has not been followed as offsetting which should be used as a last resort • One of the impacted watercourses has been incorrectly categorised and therefore not considered appropriately in mitigation and net gain calculations • The revised plans have extended the red line boundary of the site and include the removal of approx.. 50 more trees. • Grass verges will now be concreted over and have not been given due consideration in ecological assessments and biodiversity net gain calculation • Revised biodiversity net gain calculation has reassessed habitats in red line boundary, downgraded in places to make the calculation seem more favourable • BC Ecology's officer comments that assessment provided by developer are inadequate • High likelihood for nearby fields to be used for outdoor filming especially at night which results in extreme light pollution as was the case in 2021 with Spade Oak Nature Reserve. As these areas would not be included in the application site, these areas would not be subject to the EA's conditions on artificial lighting at night.
<p>Site and wider surrounding Area</p>	<ul style="list-style-type: none"> • Planners should impose restrictions on future development and prohibit changes of use to housing • Development will increase housing pressures in the area • No green space will be left between Marlow and Bourne End Plus large area of Bourne End already removed from greenbelt) • Already many film studios in area including Pinewood who has permission to extend and Wycombe Air Park who will receive permission for permanent and temporary film space • Additional studios in the South include 900,000 square feet studio in the Thames Valley Science Park near Reading (expected to be fully operational in 2024) and a £700 million State of the Art film and TV studio planned for Broxbourne in Hertfordshire. • Site sits next to the AONB • Alternative site assessment is not very extensive and doesn't include North of England • Increase in traffic will have implications on tourism • Devalue the historic character of Marlow • Public rights of way will be used as fly tips • Desire to turn site into registered country park which this will destroy • Westhorpe Park purposely described as camping site to conceal the established community that would be most affected by proposal • Other sites such as Globe Park and the industrial estate of Marlow are mostly unoccupied. • Slough should be considered for the development

	<ul style="list-style-type: none"> • Booker airfield is a couple of miles away with a planning application for another film studio which has not provided a boost in local jobs • Better alternatives not considered – RAF Halton (large and flat enough), Old Molins site at Saunderton, land at Stonor • Para 180 – 208 NPPF – Significance derives from not only the heritage asset, but also its setting. Setting of Grade II Listed Westhorpe Park would be destroyed • Application from Marlow Football Club would have less of a significant impact compared to this larger site proposal • Applicant cannot compare site with Hollywood as movies are made in Burbank not Hollywood and therefore cannot claim that tourism will increase • No need due to studios in the surrounding area already developing: - Wycombe Film Studios (8 New sound stages) - Bray Film Studios (5 New sound stages) - Shinfield Studios (4 stages and workshops open with 14 more in development) – Shepperton Studios (adding almost 1 million sq ft of new production space) - Pinewood studios (£450m expansion) - Hertswood studios (planning the largest film studio in the UK) - Elstree Studios (2 new ‘super stages’) • Many green spaces are being lost. A lorry park for 300 vehicles is being approved and Wycombe Wanderers will likely have their new training ground close to this development. • Hollands Farm is taking away 24 acres of farmland and combined with this development, there will be more strain on local infrastructure including parking, schools, traffic and health facilities. • There is a lot of empty office space in Globeside Business Park. Any new facility is likely to be unused well too. • An extension of the Chilterns AONB has been submitted to Natural England for approval. Inappropriate development should not be considered until the extension is decided • As the site is below a flight path from Heathrow and a busy civil air corridor, the site is likely to experience noise pollution and is therefore not suitable as a film studio.
Infrastructure	<ul style="list-style-type: none"> • Development will lead to more infrastructure, houses and schools in an already densely built up area • Existing sewage infrastructure does not have capacity to take on the needs of this development • Should pay for replacement bus service as public transport infrastructure won't handle the 40% increase of users • Development falls short of the standard under LTN1/20 transport strategy • The "Newt Ditch" alleviation scheme planned for East Marlow could be in jeopardy due to the studio

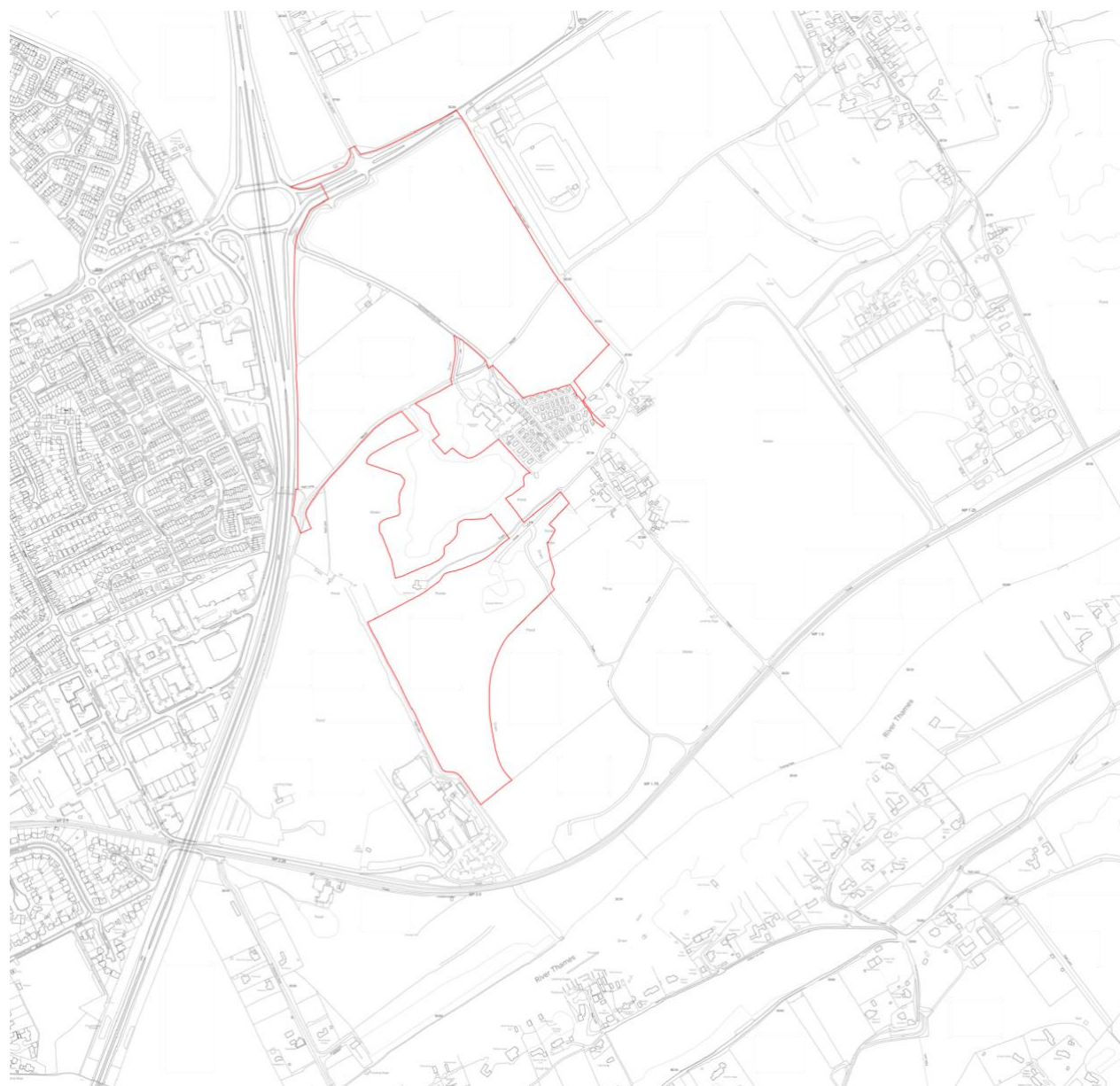
	<ul style="list-style-type: none"> • Development proposes 1,108 car parking spaces yet Waterman report states 2,381 cars will be entering daily. Overspill will be detrimental to local streets • Allocation of charging points for electric vehicles – need to upgrade local electricity network • Marlow’s infrastructure is already struggling – repetitive damage to the iconic bridge over the years is a symptom • Lack of capacity for Little Marlow sewage works to process increased waste and sewage through its system. See findings from FreshWater Watch water testing at Henley
Other	<ul style="list-style-type: none"> • Alternative space at Wycombe Air Park • Goes against the local plan: Policy RUR4, 4, 6. CP8, CP10, DM20, DM30, DM32, DM34 and DM42 • Does not support levelling up agenda – development is not just needed in the South East but other areas in the North and the Midlands • Proposed land already accounted for as mitigation for the Home Farm building project • No industry endorsement – Netflix, Amazon etc have endorsed other sites but not this showing the lack of need • Contradicts the councils Corporate Plan 2020 – 2025: Tacking climate change / Net carbon zero by 2050 / Outstanding public spaces • If the Planning Committee were to approve this application, it would be going against the democratic decisions taken by Buckinghamshire (formerly Wycombe) councillors and the majority view of the local population. • The applicant has spent much money on its media campaign and promotion of the site which has been deceiving in some cases. For example, they have given people who support the application Amazon gift cards and have described the land as 'neglected former landfill' which gives the impression it is a rubbish tip not an area of beauty and nature. Also they have printed promotional materials disguised as newspapers and used local school names claiming support when this is not the case • 2010 Application for Marlow Football ground relocation to this proposed site was denied as an inspector wrote it would contribute to the urban sprawl and erode the countryside. • Judicial Precedent – Sefton Metropolitan Borough Council v Secretary of State for Housing, Communities and Local Government and Doherty [2021] EWHC 1082 • Little Marlow Lakes Country Park (LMLCP) Was added to WDC Local Plan under Policy RUR4. Bucks council could be liable to legal challenge should this be breached.

Additional comments (not Planning related):

- Developer is located in Guernsey which is a tax haven and taxes will not go to UK treasury. Avoidance of stamp duty
- Developer is not a film making company, so development is not for their own use
- Bucks CC has amalgamated itself with corporate interests and NGOs in a growth Board going against local human rights and provides the offshore company no due diligence. No notification of this Growth board and it's not democratic
- Immoral tactics used to market the proposal on the local community
- Failed to budget for sound insulation against aircraft noise being in close proximity to Heathrow corridor
- Neuroscientific evidence shows people are mentally fitter and healthier with access to green spaces
- House prices in the local area will plummet
- Influx of staff may impact housing and make it harder for younger people trying to get on the property ladder
- Carbon emissions will skyrocket. An average 2-3 bed house creates enough carbon that takes a year for 5,000 trees to sequester. - Developer response understands this and says it happens everywhere
- Applicant claims Bucks LEP has created a strategy for the development of TV and film resources in the county. Bucks LEP is biased as it is chaired by the Senior Executive of Pinewood studios therefore it uses its strategy to continue to promote the interests of Pinewood studios
- DIDO (Guernsey) have not registered in the 'Register of Overseas Entities' which is a criminal offence. Seek ruling from HMRC to ensure no tax evasion aspects to DIDO's application.
- Data for increased need for streaming services based on 2 year old lockdown data therefore no longer relevant
- Conflicts of interest – Senior employee of Wycombe Planning Authority new role as MFS sustainability consultant. Some Marlow Town Council members are directors of Globe Park
- Studio in Hertfordshire has been halted halfway through development. Broxbourne has lost ground due to the financial climate and this could similarly happen at this development
- Developers have shown no evidence of client relationships with film studios or production companies who would move in
- Cllr Scott mentioned in his comment on 06/09/23 that Marlow Town Council had an informal meeting in support. No public record of full Town Council Meeting between 6th September and 25th September when rep was uploaded by Cllr Funnell. Misleading response from Cllr Funnell
- Less spending on High End TV - HETV contributed to nearly 70% of production spend in 2022. Recent report by Knight Frank – UK Film and Television Studios Market 2023 report confirms that there is sufficient studio space in the UK and no new builds are required.
- No response regarding denied FOI requests
- No public meeting for residents held

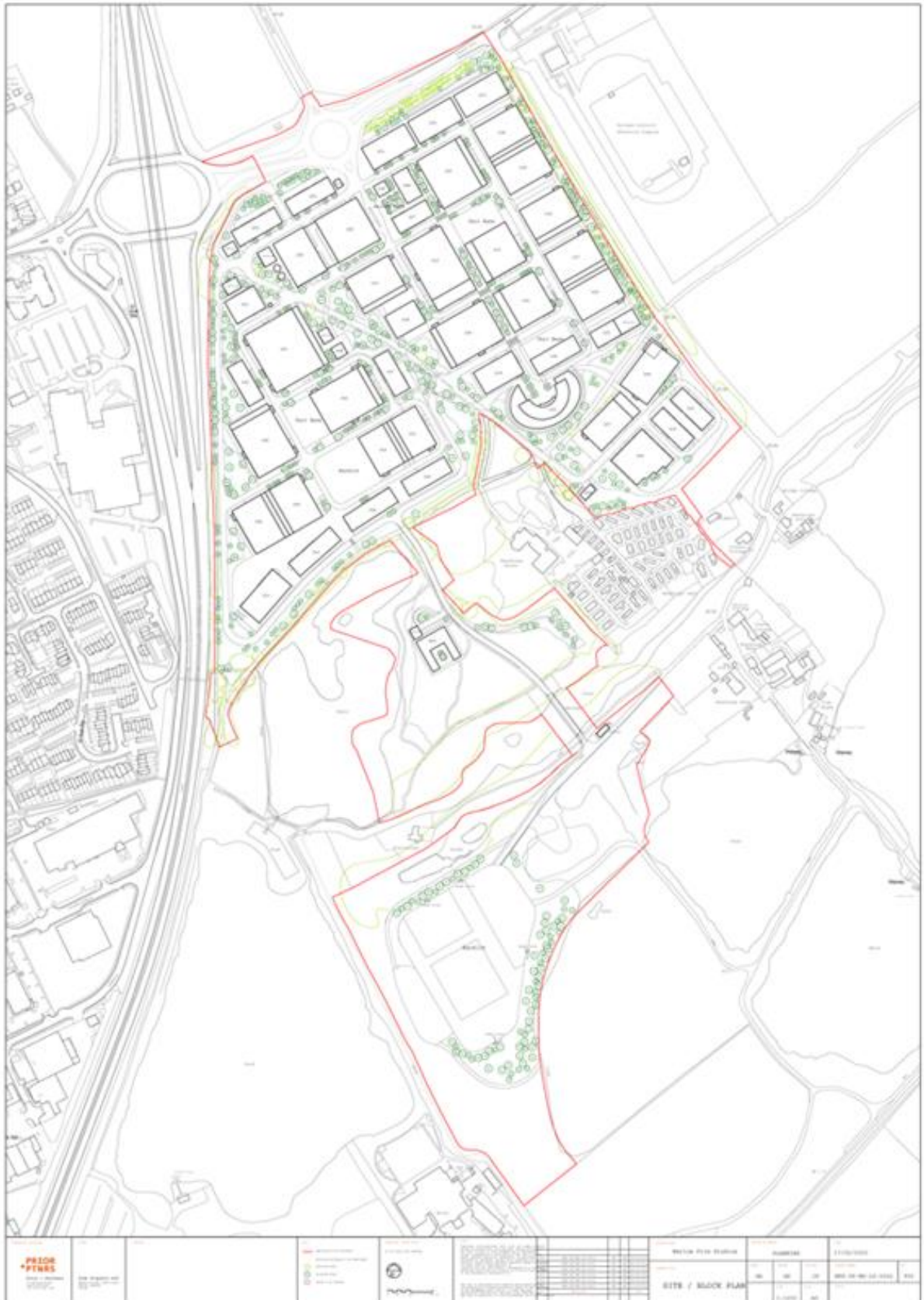
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APPENDIX B1: Site Location Plan



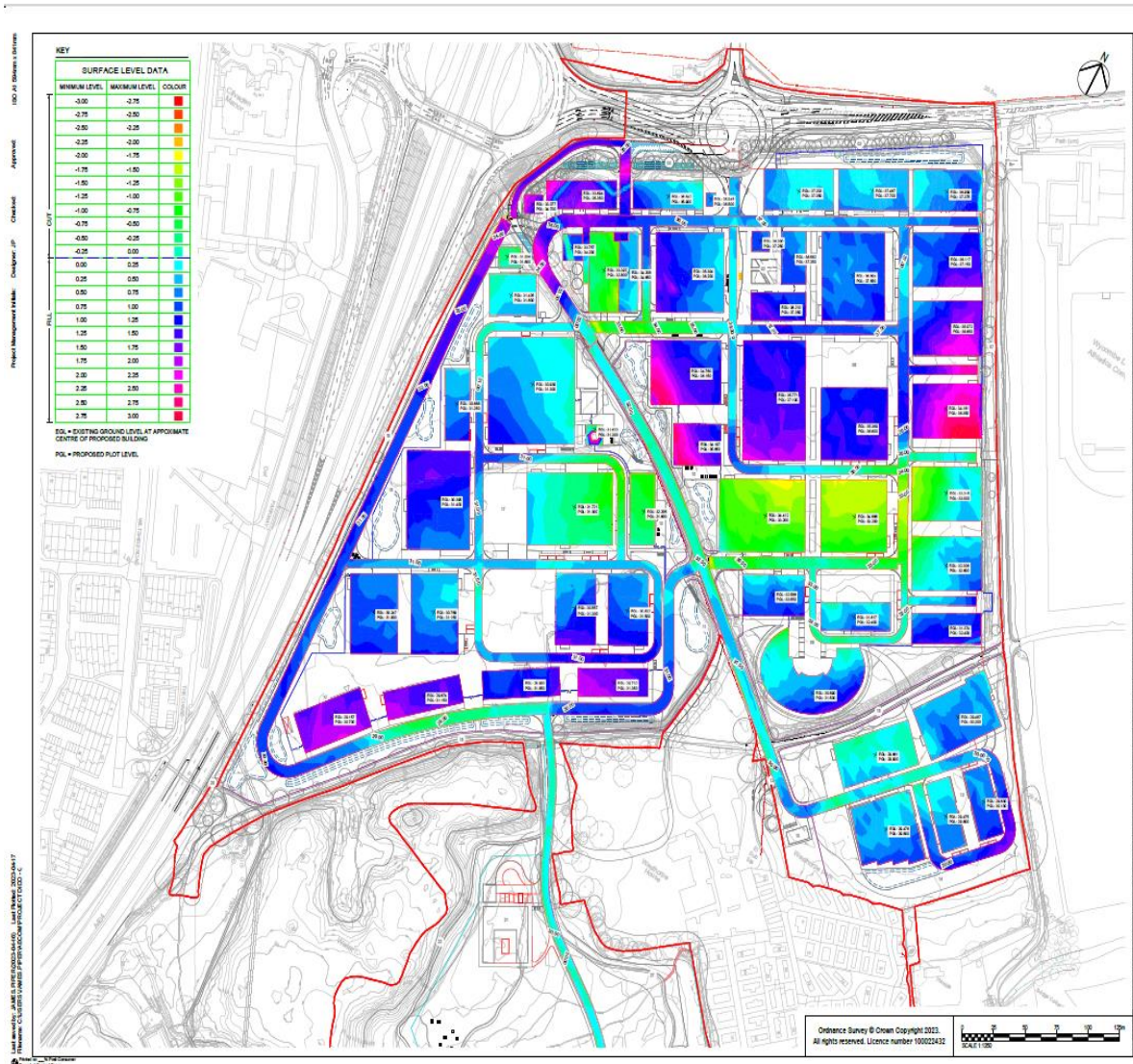
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Appendix B2: Masterplan



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Appendix B3: Levels Plan



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APPENDIX B4: Drawings List

Drawing Ref	Description	Amendment Ref						
		PL1	PL2	PL3	PL4	PL6	PL7	PL8
01841-WEA-SS-RF-DR-A-1122	Type C - Roof Plan	X						
01841-WEA-SS-00-DR-A-1125	Type D - Ground Floor Plan	X						
01841-WEA-SS-01-DR-A-1126	Type D - First Floor Plan	X						
01841-WEA-SS-RF-DR-A-1127	Type D - Roof Plan	X						
01841-WEA-SS-00-DR-A-1130	Type E - Ground Floor Plan	X						
01841-WEA-SS-01-DR-A-1131	Type E - First Floor Plan	X						
01841-WEA-SS-RF-DR-A-1132	Type E - Roof Plan	X						
01841-WEA-SS-00-DR-A-1135	Type F - Ground Floor Plan	X						
01841-WEA-SS-01-DR-A-1136	Type F - First Floor Plan	X						
01841-WEA-SS-RF-DR-A-1137	Type F - Roof Plan	X						
01841-WEA-SS-00-DR-A-1140	Type C1 - Ground Floor Plan	X						
01841-WEA-SS-01-DR-A-1141	Type C1 - First Floor Plan	X						
01841-WEA-SS-RF-DR-A-1142	Type C1 - Roof Plan	X						
WEA- 1200 Series	Offices and Workshops							
01841-WEA-WO-00-DR-A-1200	Type 1A - Ground Floor Plan	X				X		
01841-WEA-WO-01-DR-A-1201	Type 1A - First Floor Plan	X						
01841-WEA-WO-RF-DR-A-1202	Type 1A - Roof Plan	X						
01841-WEA-WO-00-DR-A-1205	Type 1B - Ground Floor Plan	X				X		
01841-WEA-WO-01-DR-A-1206	Type 1B - First Floor Plan	X						
01841-WEA-WO-RF-DR-A-1207	Type 1B - Roof Plan	X						
01841-WEA-WO-00-DR-A-1215	Type 4A - Ground Floor Plan	X						
01841-WEA-WO-01-DR-A-1216	Type 4A - First Floor Plan	X						
01841-WEA-WO-02-DR-A-1217	Type 4A - Second Floor Plan	X						
01841-WEA-WO-RF-DR-A-1218	Type 4A - Roof Plan	X						
01841-WEA-WO-00-DR-A-1220	Type 2A - Ground Floor Plan	X						
01841-WEA-WO-01-DR-A-1221	Type 2A - First Floor Plan	X						
01841-WEA-WO-02-DR-A-1222	Type 2A - Second Floor Plan	X						

01841-WEA-WO-RF-DR-A-1223	Type 2A - Roof Plan	X						
01841-WEA-WO-00-DR-A-1225	Type 3A - Ground Floor Plan	X						
01841-WEA-WO-01-DR-A-1226	Type 3A - First Floor Plan	X						
01841-WEA-WO-02-DR-A-1227	Type 3A - Second Floor Plan	X						
01841-WEA-WO-RF-DR-A-1228	Type 3A - Roof Plan	X						
01841-WEA-WO-00-DR-A-1230	Type 3C - Ground Floor Plan	X						
01841-WEA-WO-01-DR-A-1231	Type 3C - First Floor Plan	X						
01841-WEA-WO-02-DR-A-1232	Type 3C- Second Floor Plan	X						
01841-WEA-WO-RF-DR-A-1233	Type 3C- Roof Plan	X						
01841-WEA-WO-00-DR-A-1240	Type 4B - Ground Floor Plan	X						
01841-WEA-WO-01-DR-A-1241	Type 4B - First Floor Plan	X						
01841-WEA-WO-02-DR-A-1242	Type 4B - Second Plan	X						
01841-WEA-WO-RF-DR-A-1243	Type 4B - Roof Plan	X						
01841-WEA-WO-00-DR-A-1245	Type 2B - Ground Floor Plan	X						
01841-WEA-WO-01-DR-A-1246	Type 2B - First Floor Plan	X						
01841-WEA-WO-RF-DR-A-1247	Type 2B - Roof Plan	X						
01841-WEA-WO-00-DR-A-1255	Type 1C - Ground Floor Plan	X				X		
01841-WEA-WO-01-DR-A-1256	Type 1C - First Floor Plan	X				X		
01841-WEA-WO-RF-DR-A-1257	Type 1C - Roof Plan	X				X		
01841-WEA-WO-00-DR-A-1260	Type 6 - Ground Floor Plan	X						
01841-WEA-WO-01-DR-A-1261	Type 6 - First Floor Plan	X						
01841-WEA-WO-RF-DR-A-1262	Type 6 - Roof Plan	X						
01841-WEA-WO-00-DR-A-1265	Type 3B - Ground Floor Plan	X						
01841-WEA-WO-01-DR-A-1266	Type 3B - First Floor Plan	X						
01841-WEA-WO-02-DR-A-1267	Type 3B - Second Plan	X						
01841-WEA-WO-RF-DR-A-1268	Type 3B - Roof Plan	X						
01841-WEA-WO-00-DR-A-1270	Type 1E - Ground Floor Plan	X						
01841-WEA-WO-01-DR-A-1271	Type 1E - First Floor Plan	X						
01841-WEA-WO-02-DR-A-1272	Type 1E - Second Plan	X	X					
01841-WEA-WO-RF-DR-A-1273	Type 1E - Roof Plan	X						
01841-WEA-WO-00-DR-A-1285	Type 1D - Ground Floor Plan	X						
01841-WEA-WO-01-DR-A-1286	Type 1D - First Floor Plan	X						

01841-WEA-WO-02-DR-A-1287	Type 1D - Second Plan	X	X					
01841-WEA-WO-RF-DR-A-1288	Type 1D - Roof Plan	X						
01841-WEA-WO-00-DR-A-1290	Type 1F - Ground Floor Plan	X						
01841-WEA-WO-01-DR-A-1291	Type 1F - First Floor Plan	X	X					
01841-WEA-WO-RF-DR-A-1292	Type 1F - Roof Plan	X						
WEA- 1300 Series	Studio Hub							
01841-WEA-SH-00-DR-A-1300	Ground Floor Plan	X	X					
01841-WEA-SH-01-DR-A-1301	First Floor Plan	X						
01841-WEA-SH-02-DR-A-1302	Second Floor Plan	X	X					
01841-WEA-SH-RF-DR-A-1303	Roof Plan	X	X					
WEA- 1400 Series	Entrance Square Buildings							
01841-WEA-MH-00-DR-A-1400	Ground Floor Plan	X	X			X		
01841-WEA-MH-XX-DR-A-1401	First Floor Plan	X	X					
01841-WEA-MH-RF-DR-A-1402	Roof Plan	X	X					
WEA- 1500 Series	Pavilions							
01841-WEA-PA-00-DR-A-1500	Ground Floor Plan	X	X					
01841-WEA-PA-RF-DR-A-1501	Roof Plan	X	X					
WEA- 1600 Series	Ancillary							
01841-WEA-AN-00-DR-A-1600	Art Tower	X						
01841-WEA-AN-00-DR-A-1610	Entrance Canopy	X						
01841-WEA-AN-00-DR-A-1620	Plant Buildings	X						
WEA- 1700 Series	Carparks							
01841-WEA-CP-00-DR-A-1700	North Carpark - Ground Floor Plan	X		X		X		
01841-WEA-CP-01-DR-A-1701	North Carpark - First Floor Plan	X		X				
01841-WEA-CP-XX-DR-A-1702	North Carpark - Typical Floor Plan	X						
01841-WEA-CP-RF-DR-A-1704	North Carpark - Roof Plan	X						

01841-WEA-CP-00-DR-A-1705	South Carpark - Ground Floor Plan	X						
01841-WEA-CP-01-DR-A-1706	South Carpark - First Floor Plan	X						
01841-WEA-CP-XX-DR-A-1707	South Carpark - Typical Floor Plan	X						
01841-WEA-CP-04-DR-A-1708	South Carpark - Fourth Floor Plan	X						
01841-WEA-CP-RF-DR-A-1709	South Carpark - Roof Plan	X						
WEA- 1800 Series	Culture and Skills Academy							
01841-WEA-CA-00-DR-A-1800	CSA - Ground Floor Plan	X	X					
01841-WEA-CA-01-DR-A-1801	CSA - First Floor Plan	X	X					
01841-WEA-CA-RF-DR-A-1802	CSA - Roof Plan	X	X					
WEA- 1900 Series	Community Building							
01841-WEA-CB-00-DR-A-1900	Community Building - Ground Floor Plan	X	X					
2000	EXTERNAL ELEVATIONS							
WEA- 2100 Series	Sound Stages							
01841-WEA-SS-ZZ-DR-A-2100	Type A - Elevations 1/2	X	X					
01841-WEA-SS-ZZ-DR-A-2101	Type A - Elevations 2/2	X						
01841-WEA-SS-ZZ-DR-A-2105	Type AA - Elevations 1/2	X						
01841-WEA-SS-ZZ-DR-A-2106	Type AA - Elevations 2/2	X	X					
01841-WEA-SS-ZZ-DR-A-2110	Type A1 - Elevations 1/2	X						
01841-WEA-SS-ZZ-DR-A-2111	Type A1 - Elevations 2/2	X						
01841-WEA-SS-ZZ-DR-A-2115	Type B - Elevations 1/2	X						
01841-WEA-SS-ZZ-DR-A-2116	Type B - Elevations 2/2	X						
01841-WEA-SS-ZZ-DR-A-2120	Type C - Elevations 1/2	X						
01841-WEA-SS-ZZ-DR-A-2121	Type C - Elevations 2/2	X						
01841-WEA-SS-ZZ-DR-A-2125	Type D - Elevations 1/2	X						
01841-WEA-SS-ZZ-DR-A-2126	Type D - Elevations 2/2	X						
01841-WEA-SS-ZZ-DR-A-2130	Type E - Elevations 1/2	X						
01841-WEA-SS-ZZ-DR-A-2131	Type E - Elevations 2/2	X	X					
01841-WEA-SS-ZZ-DR-A-2135	Type F - Elevations 1/2	X						
01841-WEA-SS-ZZ-DR-A-2136	Type F - Elevations 2/2	X	X					

01841-WEA-SS-ZZ-DR-A-2140	Type C1 - Elevations 1/2	X	X					
01841-WEA-SS-ZZ-DR-A-2141	Type C1 - Elevations 2/2	X						
WEA- 2200 Series	Offices and Workshops							
01841-WEA-WO-ZZ-DR-A-2200	Type 1A - Elevations	X						
01841-WEA-WO-ZZ-DR-A-2205	Type 1B - Elevations	X						
01841-WEA-WO-ZZ-DR-A-2215	Type 4A - Elevations	X	X					
01841-WEA-WO-ZZ-DR-A-2220	Type 2A - Elevations	X						
01841-WEA-WO-ZZ-DR-A-2225	Type 3A - Elevations	X						
01841-WEA-WO-ZZ-DR-A-2230	Type 3C - Elevations	X						
01841-WEA-WO-ZZ-DR-A-2240	Type 4B - Elevations	X	X					
01841-WEA-WO-ZZ-DR-A-2245	Type 2B - Elevations	X						
01841-WEA-WO-ZZ-DR-A-2255	Type 1C - Elevations	X				X		
01841-WEA-WO-ZZ-DR-A-2260	Type 6 - Elevations	X						
01841-WEA-WO-ZZ-DR-A-2261	Type 6 - Elevations	X						
01841-WEA-WO-ZZ-DR-A-2265	Type 3B - Elevations	X						
01841-WEA-WO-ZZ-DR-A-2266	Type 3B - Elevations	X						
01841-WEA-WO-ZZ-DR-A-2270	Type 1E - Elevations	X	X					
01841-WEA-WO-ZZ-DR-A-2285	Type 1D - Elevations	X						
01841-WEA-WO-ZZ-DR-A-2290	Type 1F - Elevations	X						
WEA- 2300 Series	Studio Hub							
01841-WEA-SH-NS-DR-A-2300	Elevations	X						
01841-WEA-SH-EW-DR-A-2301	Elevations	X						
WEA- 2400 Series	Entrance Square Buildings							
01841-WEA-MH-ZZ-DR-A-2400	Elevations 1/3	X						
01841-WEA-MH-ZZ-DR-A-2401	Elevations 2/3	X	X					
01841-WEA-MH-ZZ-DR-A-2402	Elevations 3/3	X	X					
WEA- 2500 Series	Pavilions							
01841-WEA-PA-ZZ-DR-A-2500	Elevations 1/2	X	X					

01841-WEA-PA-ZZ-DR-A-2501	Elevations 2/2		X						
WEA- 2600 Series	Ancillary								
01841-WEA-AN-ZZ-DR-A-2610	Entrance Canopy Elevation & Section	X							
WEA- 2700 Series	Carparks								
01841-WEA-CP-ZZ-DR-A-2700	North Carpark - Elevations	X							
01841-WEA-CP-ZZ-DR-A-2701	North Carpark - Elevations	X							
01841-WEA-CP-ZZ-DR-A-2705	South Carpark - Elevations	X							
01841-WEA-CP-ZZ-DR-A-2706	South Carpark - Elevations	X							
WEA- 2800 Series	Culture and Skills Academy								
01841-WEA-CA-ZZ-DR-A-2800	CSA - Elevations 1/2	X	X						
01841-WEA-CA-ZZ-DR-A-2801	CSA - Elevations 2/2		X						
3000	SECTIONS								
WEA- 3100 Series	Sound Stages								
01841-WEA-SS-ZZ-DR-A-3100	Type A - Sections	X							
01841-WEA-SS-ZZ-DR-A-3105	Type AA - Sections	X							
01841-WEA-SS-ZZ-DR-A-3110	Type A1 - Sections	X							
01841-WEA-SS-ZZ-DR-A-3115	Type B - Sections	X							
01841-WEA-SS-ZZ-DR-A-3120	Type C - Sections	X							
01841-WEA-SS-ZZ-DR-A-3125	Type D - Sections	X							
01841-WEA-SS-ZZ-DR-A-3130	Type E - Sections	X							
01841-WEA-SS-ZZ-DR-A-3135	Type F - Sections	X							
01841-WEA-SS-ZZ-DR-A-3140	Type C1 - Sections	X							
WEA- 3200 Series	Offices and Workshops								
01841-WEA-WO-ZZ-DR-A-3200	Type 1A - Sections	X							
01841-WEA-WO-ZZ-DR-A-3205	Type 1B - Sections	X							
01841-WEA-WO-ZZ-DR-A-3215	Type 4A - Sections	X							
01841-WEA-WO-ZZ-DR-A-3220	Type 2A - Sections	X							

01841-WEA-WO-ZZ-DR-A-3225	Type 3A - Sections	X							
01841-WEA-WO-ZZ-DR-A-3230	Type 3C - Sections	X							
01841-WEA-WO-ZZ-DR-A-3240	Type 4B - Sections	X							
01841-WEA-WO-ZZ-DR-A-3245	Type 2B - Sections	X							
01841-WEA-WO-ZZ-DR-A-3255	Type 1C - Sections	X				X			
01841-WEA-WO-ZZ-DR-A-3260	Type 6 - Sections	X							
01841-WEA-WO-ZZ-DR-A-3265	Type 3B - Sections	X							
01841-WEA-WO-ZZ-DR-A-3270	Type 1E - Sections	X							
01841-WEA-WO-ZZ-DR-A-3285	Type 1D - Sections	X							
01841-WEA-WO-ZZ-DR-A-3290	Type 1F - Sections	X							
WEA- 3300 Series	Studio Hub								
01841-WEA-SH-ZZ-DR-A-3300	Sections	X							
WEA- 3400 Series	Entrance Square Buildings								
01841-WEA-MH-ZZ-DR-A-3400	Sections	X							
01841-WEA-MH-ZZ-DR-A-3401	Sections	X							
WEA- 3500 Series	Pavilions								
01841-WEA-PA-ZZ-DR-A-3500	Sections	X							
WEA- 3700 Series	Carparks								
01841-WEA-CP-ZZ-DR-A-3700	North Carpark - Sections	X		X					
01841-WEA-CP-ZZ-DR-A-3705	South Carpark - Sections	X							
WEA- 3800 Series	Culture and Skills Academy								
01841-WEA-CA-ZZ-DR-A-3800	CSA - Sections	X							
4000	TYPICAL BAY DETAILS								
WEA- 4100 Series	Sound Stages								
01841-WEA-SS-ZZ-DR-A-4100	Primary Detail Façade - Access Door	X							

01841-WEA-SS-ZZ-DR-A-4101	Primary Detail Façade - Pedestrian Door	X							
01841-WEA-SS-ZZ-DR-A-4102	Primary Detail Façade - Stair Core	X							
01841-WEA-SS-ZZ-DR-A-4103	Secondary Detail Façade - Service	X							
01841-WEA-SS-ZZ-DR-A-4104	Type F - Primary Detail Facade	X							
01841-WEA-SS-ZZ-DR-A-4106	Type F - Side Detail Facade	X							
WEA- 4200 Series	Offices and Workshops								
01841-WEA-WO-ZZ-DR-A-4200	Type 1 - Primary Detail Facade	X							
01841-WEA-WO-ZZ-DR-A-4201	Type 1 - Secondary Detail Facade	X							
01841-WEA-WO-ZZ-DR-A-4202	Type 1 - Side Detail Facade	X							
01841-WEA-WO-ZZ-DR-A-4210	Type 2 - Primary Detail Facade	X							
01841-WEA-WO-ZZ-DR-A-4211	Type 2 - Secondary Detail Facade	X							
01841-WEA-WO-ZZ-DR-A-4212	Type 2 - Side Detail Facade	X							
01841-WEA-WO-ZZ-DR-A-4220	Type 3 - Primary Detail Facade	X							
01841-WEA-WO-ZZ-DR-A-4222	Type 3 - Side Detail Facade	X							
01841-WEA-WO-ZZ-DR-A-4230	Type 4 - Primary Detail Facade	X							
01841-WEA-WO-ZZ-DR-A-4240	Type 6 - Primary Detail Facade	X							
01841-WEA-WO-ZZ-DR-A-4241	Type 6 - Secondary Detail Facade	X							
01841-WEA-WO-ZZ-DR-A-4242	Type 6 - Side Detail Facade	X							
WEA- 4300 Series	Studio Hub								
01841-WEA-SH-ZZ-DR-A-4300	South Detail Facade	X							
01841-WEA-SH-ZZ-DR-A-4301	North Detail Facade	X							
WEA- 4400 Series	Entrance Square Buildings								
01841-WEA-MH-ZZ-DR-A-4400	Primary Detail Facade	X							
01841-WEA-MH-ZZ-DR-A-4401	Side Detail Facade	X							
01841-WEA-MH-ZZ-DR-A-4402	Reception Building Primary Detail Facade	X							
WEA- 4500 Series	Pavilions								
01841-WEA-PA-ZZ-DR-A-4500	Primary Detail Facade	X							

01841-WEA-PA-ZZ-DR-A-4501	Secondary Detail Facade	X							
WEA- 4700 Series	Carparks								
01841-WEA-CP-ZZ-DR-A-4700	Carpark - Primary Detail Facade	X							
WEA- 4800 Series	Culture and Skills Academy								
01841-WEA-CA-ZZ-DR-A-4800	Primary Detail Facade	X							
PRIOR & PARTNERS DRAWINGS									
PP	General Arrangement								
MFS-PP-MP-LP-0001	Location Plan	X			X	X			
MFS-PP-MP-LP-0002	Site/Block Plan	X			X	X-Rev P06			
MFS-PP-MP-LP-0003	Security & Fencing Plan	X				X-Rev P03			
GILLESPIES DRAWINGS - ILLUSTRATIVE AND NOT FOR APPROVAL.									
GIL	General Arrangement								
P20514-00-003-GIL-0100	Landscape Masterplan	X				X- Rev 13			
P20514-00-003-GIL-0101	Tree Canopy Cover Plan	X				X- Rev 08			
AECOM DRAWINGS									
AECOM	General Arrangement								
60654980-ACM-XX-XX-SK-HW-000033	Plot 4/5 Crossing	X				X- Rev P06			
60654980-ACM-XX-XX-DR-HW-000013	Conceptual Roundabout Arrangement								
60654980-ACM-XX-XX-SK-CE-000019	Illustrative Design Levels						X-Rev P01		
60654980-ACM-XX-XX-DR-HW-000019	A404/A4155 Westhorpe Interchange, Conceptual Junction Improvement Option 1							X-Rev P01	
60654980-ACM-XX-XX-DR-HW-000020	A404/A4155 Westhorpe Interchange, Conceptual Junction Improvement Option 2							X-Rev P01	

60654980-ACM-XX-XX-DR-HW-000023	Illustrative Conceptual Marlow Road and Westhorpe Interchange Improvements							X-Rev P01
	TOTAL DRAWINGS	216	29	3	2	20	5	3

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APPENDIX C: Area Schedule + Building Heights

<i>Building Type</i>	<i>Height</i>	<i>Total GEA floorspace</i>
Sound Stage	Up to 22m	43 921 sqm
Multistorey car park	Up to 19.8m	44 433 sqm
Workshop/Offices	Up to 19.1m	45 782 sqm
Studio Hub	17m	2736 sqm
Skills and Culture Academy	12.1m	1305 sqm
Community Building	4.9m	147 sqm
Backlot	-----	24 071sqm
Unit base	-----	4465 sqm
Mobility hub	13.4m	1292 sqm
Recreation space	----	2.81 ha

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APPENDIX D: Sample Building Design Details – Elevations + CGIs

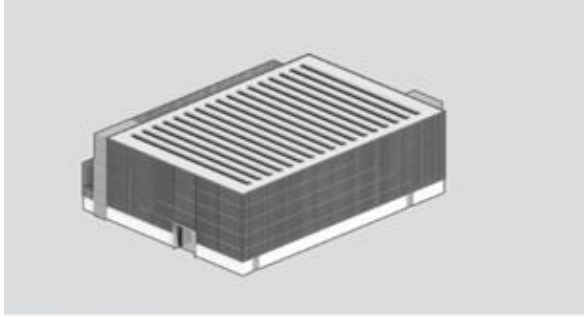


Figure 7.6 Sound Stage Type A

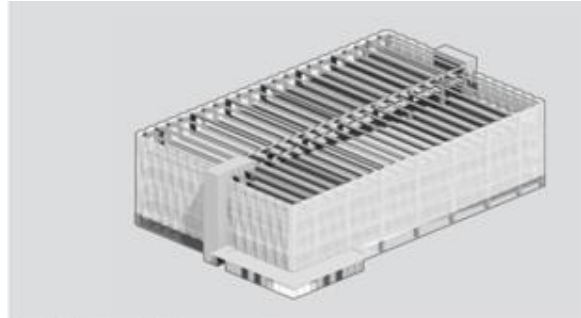


Figure 7.104 Southern Multi-Storey Carpark



Figure 7.9 Offices & Workshops Type 2

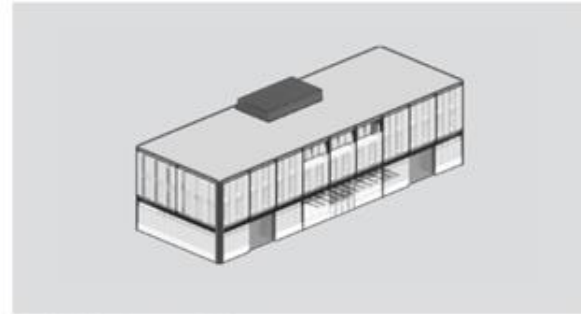


Figure 7.10 Offices & Workshops Type 3

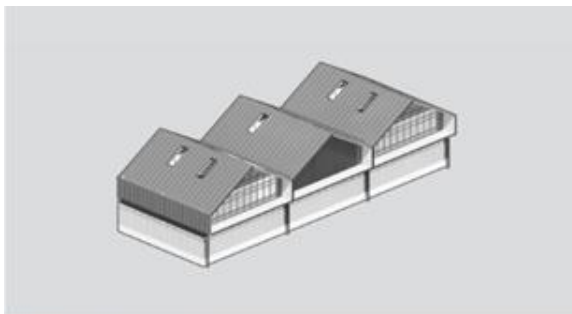


Figure 7.8 Offices & Workshops Type 1

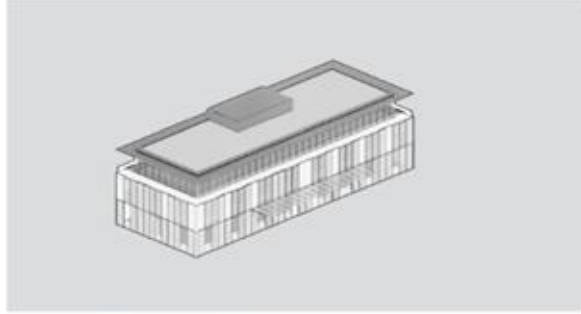


Figure 7.11 Offices & Workshops Type 4



Figure 7.12 Studio Hub

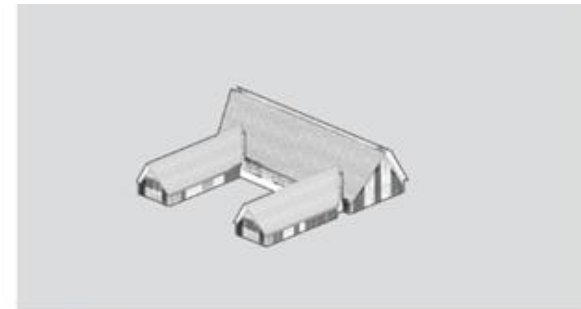


Figure 7.13 Culture and Skills Academy

Example Building CGIs

Sound Stages:



Car Park:



Workshops & Offices:



Studio Hub:



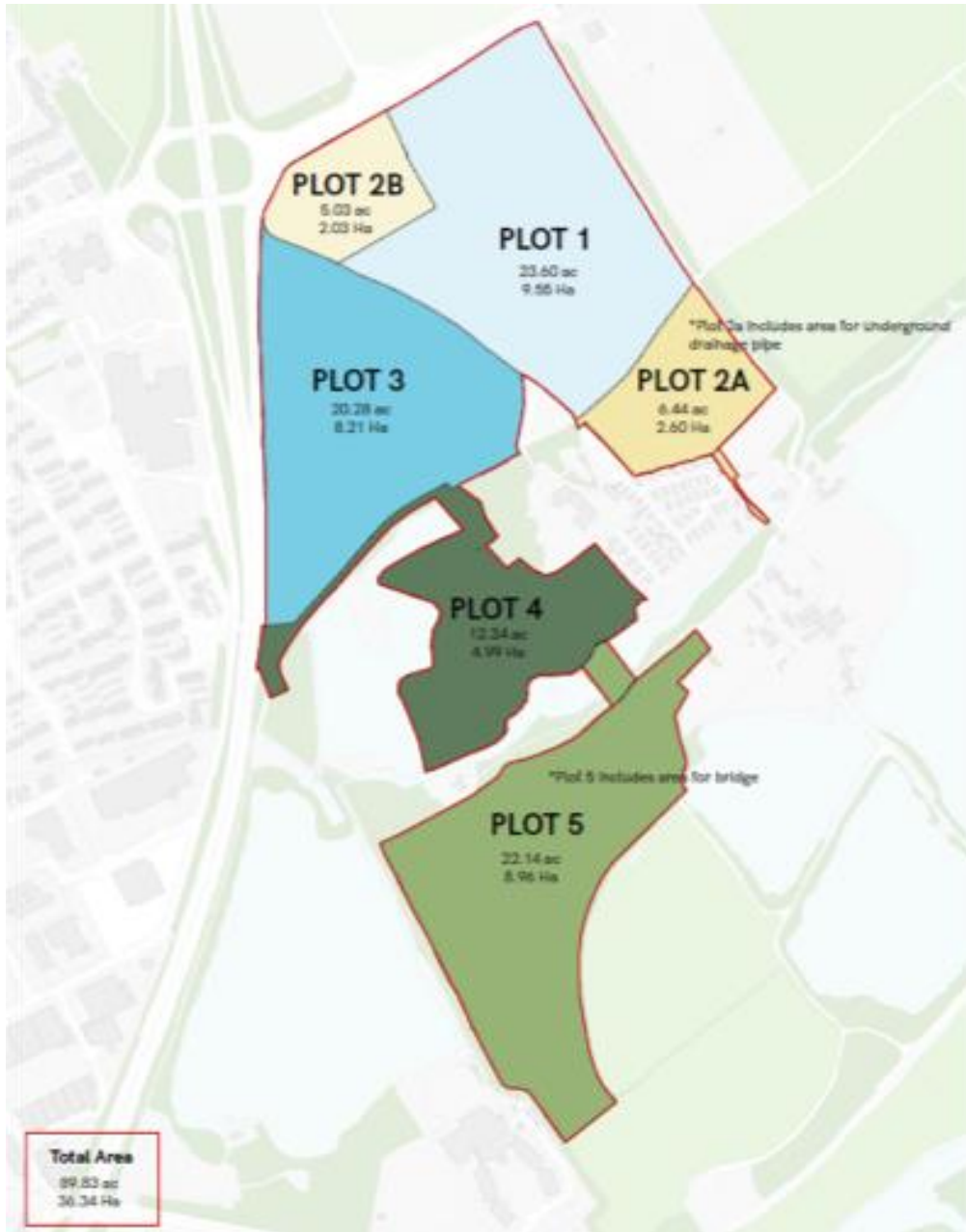
Culture & Skills Academy:



Community Building:



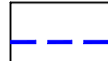





Appendix E1: Plots






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APPENDIX E2: BNG off site land

LEGEND

-  RUR4 policy area
-  Spade Oak in Council Ownership, SANG proposed
-  Marlow Film Studio Application Area
-  BNG offset site boundary
-  Existing PROW LMA 4/1
-  Existing permissive footpath

INDICATIVE LAYOUT

-  Proposed footpath
3m width
-  Proposed shared path (pedestrian and cyclist)
3m width
-  BNG offset area (approx. 180,000m2)



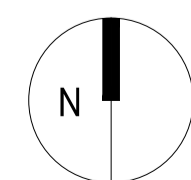
01 Offsite Land for BNG delivery
Scale 1: 4000 @A1

rev	details	by	date	rev	details	by	date
SK00	Issued for Planning	MM	03.05.2023				
SK01	Issued for Planning	MM	20.06.2023				

Notes

- Information shown on these drawings is not valid for Construction. Please refer to the status of the drawing in the Title and Issue box
- Do not scale from this drawing, use figured dimensions only where they are shown
- Any contractor that chooses to take forward this information for construction without full review process and sign-off does so at their own risk.
- All measurements are to be checked on site prior to construction.
- This drawing is to be read in conjunction with all other Gillespies drawings and specification and other consultants drawings as referred.
- Where any conflict or inconsistency occurs between drawing and specification information the Contractor is to immediately notify Gillespies prior to continuing working.
- Information to be read in coordination with Structural Engineer & M&E Engineer drawings & spec; Where any conflict or inconsistency occurs between Gillespies and Engineers drawing and specification information the Contractor is to immediately notify Gillespies prior to continuing working.

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Project title
MARLOW FILM STUDIO

Drawing title
Offsite Land for BNG

Drawing	Revision
P20514-00-003-GIL-0831	
Drawing Status PLANNING	Revision SK01
Date 03.05.2023	Scale As shown @ A1
Drawn MM	Checked PC

Client
Dido Property Limited

GILLESPIES

1 St John's Square, London EC1M 4JH
P: 020 7253 2929 E: design.london@gillespies.co.uk

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APPENDIX F: Phasing Plan



Phase 01

Off Site highways and Site Wide enabling works and infrastructure including enabling plot 4 the Country Park and plot 05 the Backlot and contractors site compound

Phase 02

Entrance Hub, Primary Services Buildings, MSCPs, Culture and Skills Academy and community building for Residential Park Homes

Phase 03

Plot 1 (North) Studio Hub

Phase 04

Plot 1 (South) and Studio Hub

Phase 05

Plot 2b production offices and MSCP North

Phase 06

Plot 3 South—Sound Stages plus waterfront offices and workshops

Phase 07

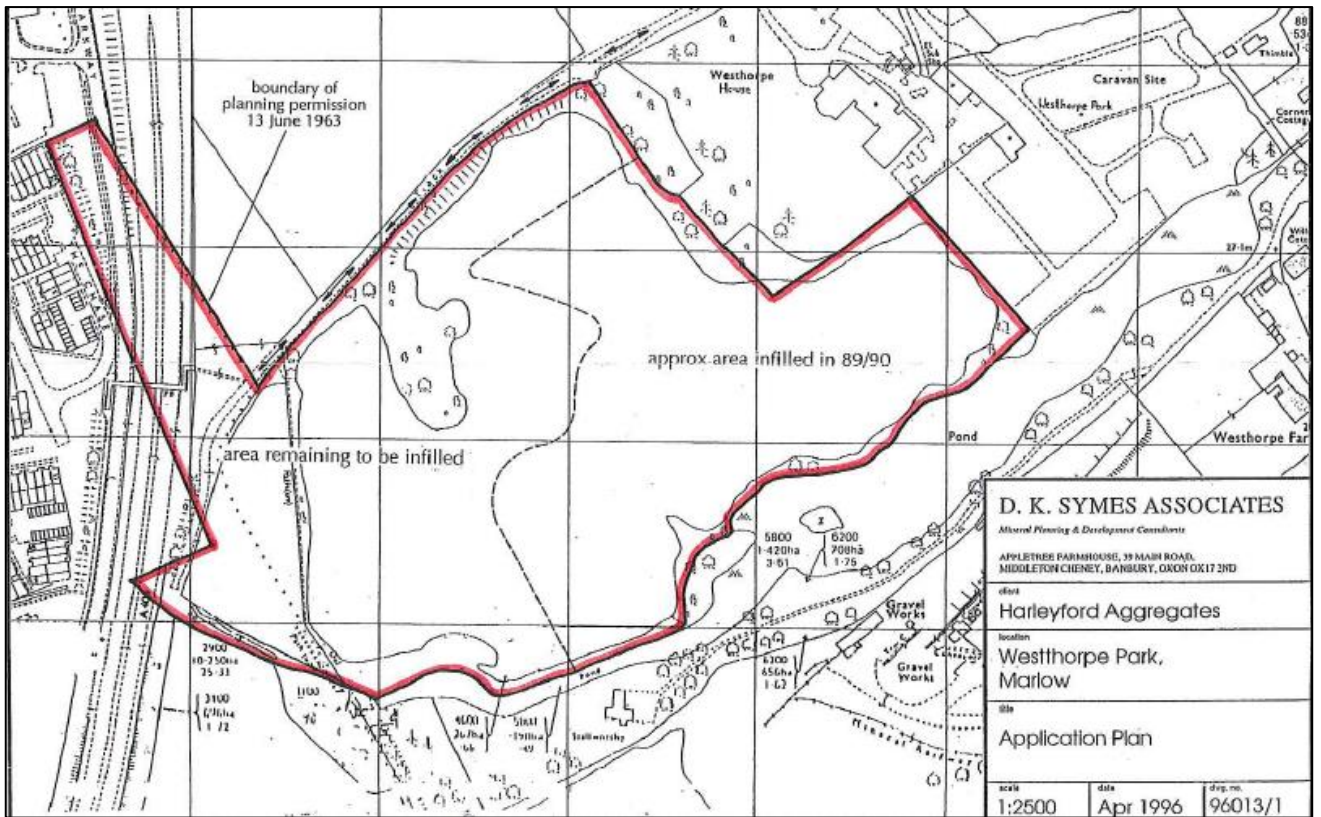
Plot 3 North - construction of 3 Sound Stages and HQ building

Phase 08

Plot 2a—Construction of 1 Sound Stage and workshops and offices South

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APPENDIX G: ROMP Plan



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Appendix H: ES Mitigation Tables 17.1 and 17.2

Table 17.1: Summary of Mitigation & Monitoring Measures During the Works of the Development

Mitigation, Monitoring or Enhancement Measure	Effect being mitigated, monitored or enhanced	Possible Method of Implementation
<p>Construction Environmental Management Plan (CEMP)</p> <p>A full CEMP will be subject to a Planning Condition. The full CEMP will consider the following mitigation measures.</p> <p>Control measures within the CEMP to minimise noise and would include but not limited to:</p> <ul style="list-style-type: none"> • Use of hoarding to the required height and density appropriate to the noise sensitivity of the Site; • Use of modern, quiet and well maintained machinery such as electric powered plant, where possible and hoists should use the Variable Frequency Converter drive system; • Vehicles and mechanical plant used for the works would be fitted with exhaust silencers, which would be maintained in good and efficient working order and operated in such a manner as to minimise noise emissions in accordance with the relevant EU / UK noise limits applicable to that equipment or no noisier than would be expected based the noise levels quoted in BS 5228. Plant should be properly maintained and operated in accordance with manufacturers' recommendations. Electrically powered plant would be preferred, where practicable, to mechanically powered alternatives; • Avoidance of unnecessary noise (such as engines idling between operations, excessive revving or engines) by effective site management; • Use of acoustic screens or enclosures where possible to reduce localised noise emissions around key plant; 	<p>Adverse environmental effects during the Works from:</p> <ul style="list-style-type: none"> • Noise and Vibration from demolition and construction; • Dust; • Contaminated dust or surface run-off from stockpiles affecting off-site receptors; • Handling and storage of potentially hazardous liquids on-Site; • Drainage and Spill control; • Construction Traffic including provision of a Construction Logistics Plan (see below); • Site lighting during construction; • Flood risk; • Impact on potable water network; • Impact on public sewerage network; • Construction waste. 	<p>Planning Condition</p>

Mitigation, Monitoring or Enhancement Measure	Effect being mitigated, monitored or enhanced	Possible Method of Implementation
<ul style="list-style-type: none"> • Establish noise and vibration target levels (a Section 61 agreement under the Control of Pollution Act 1974 (COPA)) to reduce noise and vibration to a minimum in accordance with best practicable means, as defined in Section 72 of COPA; • Demolition works to have consideration to Demolition Code of Practice BS6187² (2011); • Using low impact techniques where possible (demolition munchers); • Off-site prefabrication or preparation of building elements where possible to reduce on-site works; • Where required, monitoring of noise and vibration levels; • Changing, where possible, methods and processes to keep noise and vibration levels low as reasonably practicable (e.g. dismantling rather than traditional demolition works where adjoining or immediately adjacent to buildings); • Resilient mounting of plant/equipment where required to prevent vibration transfer into building structures. • Acoustically disconnect adjoining buildings prior to demolition works where required (cutting structure to separate from sensitive receptor) to prevent vibration transfer during main works; • Removal of obstructions at piling locations (old basements/foundation) prior to piling to reduce generated vibration levels, although coring through existing piles at urban locations is an accepted approach but may give rise to higher vibration levels; • Use of broad-band audible alarms wherever practicable including reversing alarms and other equipment such as mobile elevated work platforms; • Positioning and or screening plant as far away from residential property as physically possible; • Works would be limited to the specified hours (08:00 and 18:00 Monday to Friday and 08:00 to 12:30 on Saturdays, excluding Public Holidays). Any works outside of these times will be agreed in advance; and • Liaison with the occupants of adjacent properties most likely to be affected by noise or vibration from activities on the Site. The occupants should be informed of the nature of the works, proposed hours of work and anticipated duration prior to the commencement of activities. <p style="margin-left: 40px;">Flood Risk and drainage measures include:</p> <ul style="list-style-type: none"> • Storage of any hazardous substances (including solids and liquids) within impermeable, bunded areas to remove the risk of migration to exposed groundwater; • Drip trays will be provided to collect potential leaks from standing plant; • A 'Pump and Sump' system will be in place to mitigate the groundwater flooding impact; 		

Mitigation, Monitoring or Enhancement Measure	Effect being mitigated, monitored or enhanced	Possible Method of Implementation
<ul style="list-style-type: none"> • Measures such as reseeded of cleared land where appropriate as soon as practicable to minimise exposed land and reduce localised ponding of surface water, storage of construction plant/materials on hardstanding surfaces where possible to minimise silts and debris within surface water runoff, etc; • Wheel wash facilities should be provided for vehicles moving to and from the Site to prevent unacceptable levels of silts and debris entering the surface water network. • Requirements to ensure appropriate permits are obtained for any discharge and connection to public sewerage network. • Requirements to ensure adequate water supply on the Site and therefore, the magnitude of impact on potable water network. • Requirements to ensure appropriate consents/permits are obtained for any construction phase discharges of waste (including wastewater) and for any works near main river or watercourses. • Measures to prevent on-site flooding due to surcharge of public sewerage network. • Requirements to ensure appropriate consents/permits are obtained for any construction-phase discharges and permits obtained as necessary e.g. under the Environmental Permitting Regulations 2010 (as amended) including works near main river or watercourses. 		
<p>Construction Logistics Plan (CLP)</p> <p>A full CLP will be subject to a Planning Condition. The full CLP will consider the following specific transport mitigation measures, measures, as described in the Outline Construction Logistics Plan (Appendix 6.1):</p> <ul style="list-style-type: none"> • Traffic Management Plan (TMP) to include: <ul style="list-style-type: none"> – Site Location and Boundaries – Site Travel Plan – Pedestrian Routes – Access and Egress / Site routes and walkways – Vehicle Delivery and Access Routes – Phased Access Plans – Delivery/Collection Site rules and arrangements – Loading and Unloading – Horizontal and Vertical Distribution – Storage – Road closures/Traffic Restrictions or other arrangements 	<p>To minimise any adverse effects (such as noise and in relation to accidents and safety) as a result of the construction programme and construction traffic.</p>	<p>Planning Condition for a detailed CLP</p>

Mitigation, Monitoring or Enhancement Measure	Effect being mitigated, monitored or enhanced	Possible Method of Implementation
<ul style="list-style-type: none"> A Site Travel Plan (which may also be provided as a stand-alone document if required) will provide information on options for travel arrangements to site and will encourage sustainable travel. 		
<p>Materials Management Plan (MMP) and Soils Resource Plan (SRP)</p> <p>Prior to commencement a SRP will be produced as part of the MMP to identify:</p> <ul style="list-style-type: none"> Areas of the soil to be protected from earthworks and construction activities The areas and types of topsoil to be stripped, haul routes, stockpile locations The methods for stripping, stockpiling, respreading, and ameliorating landscape soils <p>On commencement, areas of soil to be protected from construction activities will be clearly marked as exclusion zones.</p> <p>Where possible soil removal will be undertaken during the spring and summer months of the year, providing a drier time of the year to undertake these works.</p> <p>After removal of the surface vegetation, any topsoil and subsoil will be excavated by the use of 360 degree excavators, removed and stored to the agreed location within the site in accordance with the SRP for future use.</p>	<p>To prevent adverse effects on areas of soil to be protected from construction activities</p>	<p>Planning Condition for a detailed CEMP</p>
<p>Traffic Management Plan (TMP)</p> <p>The TMP will form part of the detailed CLP and will include the following:</p> <ul style="list-style-type: none"> A Site Travel Plan (TP) for site operatives and visitors; Measures to encourage sustainable Transport during construction; Travel options and information of Construction Routes to site; Delivery Management and Controls of Estimate of construction vehicle numbers; and Loading/Off-loading 	<p>Temporary disruption to pedestrians, cyclists and road vehicle users during the demolition and construction works</p>	<p>Planning Condition for a detailed CLP</p>
<p>Excavation Waste</p> <p>Contaminated soils would be loaded for transportation into appropriately specified haulage trucks with automatic sheeting to prevent loose soil and dust from escaping during transit. Further mitigation measures such as wheel washing prior to vehicles leaving Site would also be implemented to prevent debris on roads.</p>	<p>Effects on Human Health from Transport of Waste</p>	<p>Planning Condition for a detailed CEMP</p>
<p>Ground Conditions</p> <p>Anticipated measures for the minimisation of potential contamination of the underlying soils and controlled waters receptors are likely to include:</p> <ul style="list-style-type: none"> The use of appropriate tanked and bunded areas for fuels, oils and other chemicals; Procedures for the management of fuels and other potentially hazardous materials, including briefing and training staff in how to report fuel spills and how to correctly use a spill-kit; 	<p>Effects to Controlled Waters from Accidental Spills and Leakages from New Contamination Sources</p>	<p>Planning Condition for a detailed CEMP</p>

Mitigation, Monitoring or Enhancement Measure	Effect being mitigated, monitored or enhanced	Possible Method of Implementation
<ul style="list-style-type: none"> • Locating stockpiles of materials known or suspected as being contaminated, on hardstanding surfaces to prevent infiltration of mobile contaminants into the underlying soils; • Dust suppression measures; and • Methods to avoid surface water ponding and collection and disposal of all on-Site run-off. 		
<p style="text-align: center;">Foundation Works Risk Assessment</p> <p>Depending on the type of piling methodology selected for use within the built development, there is a potential that preferential pathways could be created for the migration of contaminants from the made ground into the underlying bedrock aquifer. To mitigate this, a Foundation Works Risk Assessment would be prepared which would consider the most appropriate piling method for use at the Site, taking into consideration the prevailing ground conditions and the contaminant concentrations present. The piling method to be used at the Site would be confirmed following discussions with a specialist piling contractor and through consultation with the regulatory authorities; however, where feasible, the majority of the piling is likely to utilise a technique which brings potentially contaminated soils to surface, rather than displace them laterally or vertically.</p>	Effect to Controlled Waters from Piled Foundations	Planning Condition for a detailed CEMP
<p style="text-align: center;">Landfill Capacity</p> <p>The Applicant is committed to exploring the potential to retain the estimated 4,200m³ of non-hazardous waste arising from the excavation into historic landfill, within the earthworks at the Site. If it is not possible to secure the relevant environmental permit for technical or programme reasons, the Applicant will seek on or off-Site treatment and / or recovery options rather than disposal to landfill. The Applicant will seek to minimise the volume of hazardous waste for disposal by undertaking more ground investigation in due course. For any remaining hazardous waste, the Applicant will seek on or off-Site treatment and / or recovery options rather than disposal to landfill.</p>	Effect to non-hazardous landfill capacity	Planning Condition for a detailed CEMP and SWMP
<p style="text-align: center;">Ecological Mitigation and Enhancement Strategy</p> <p>An EMES would be produced and secured by condition. The EMES would set out those mitigation and enhancement measures to be implemented at the Site to ensure that Site clearance and construction activities are undertaken in accordance with environmental best practice and legislative requirements. The EMES will also set out the enhancement of retained, and provision of new, ecologically valuable habitats to provide net gain for biodiversity at the Site.</p>	Protect and enhance ecologically valuable habitats on site	Planning Condition
<p style="text-align: center;">Archaeological Investigation</p> <p>Due to the potential for the survival of below ground, archaeological remains in discrete areas of the Site, it</p>	Impacts to potential below ground archaeological remains	Planning Condition

Mitigation, Monitoring or Enhancement Measure	Effect being mitigated, monitored or enhanced	Possible Method of Implementation
<p>is recommended that a programme of archaeological evaluation is completed to confirm the presence, absence, date, value, extent and condition of any surviving archaeological remains. This programme of archaeological evaluation can be secured by way of a suitably-worded planning condition to be discharged prior to the start of any groundworks within the areas shown on Figure 15.3, ES Volume 2.</p> <p>The results of the evaluation would inform any programme of archaeological mitigation required. This could include targeted investigation prior to the commencement of construction and/or an archaeological watching brief during the construction works to ensure any remains disturbed would be preserved in record. For any remains of high or very high value, preservation in-situ should be considered through design, where practicable, to remove all impacts.</p>		
<p>Landscape and Visual Impacts - Compound</p> <p>On-site areas that are required during construction, for example site offices and storage of materials, would as far as possible, be located in visually inconspicuous areas making use of existing hoarding along the site boundaries as screening.</p>	<p>Impacts to views from nearby sensitive receptors.</p>	<p>Planning Condition</p>
<p>Landscape and Visual Impacts - Lighting</p> <p>Lighting of the construction works would be undertaken with due consideration for potential receptors. Lighting would only be installed where absolutely necessary and should be directional to avoid unnecessary light pollution.</p>	<p>Impacts to nearby sensitive receptors from temporary lighting during construction.</p>	<p>Planning Condition</p>

Table 17.2: Summary of Mitigation & Monitoring Measures for the Complete and Operational Development

Mitigation, Monitoring or Enhancement Measure	Effect being mitigated, monitored or enhanced	Method of Implementation
<p style="text-align: center;">Local Jobs and Skills</p> <p>The Applicant is committed to producing a best-in-class employment and skills programme, which would drastically improve the employment and skills offering of the Development. The guiding principles of which include:</p> <ul style="list-style-type: none"> • Engagement with a network of local schools – building awareness about the career opportunities in the industry; • FE and HE educational programmes – create programmes with FE/HE institutions that are fit for purpose and delivered using the Marlow Film Studios Culture and Skills Academy; • Marlow Film Studios Culture and Skills Academy – a facility dedicated to being accessible to host education and skill Development programmes, as well as serving the local community as space to develop career programmes and industry learning; • Deliver pathways for the existing workforce – opportunities and pathways into film and TV, focusing on local priorities, hosting skills and training events, and supporting existing initiatives such as Trainee Finder and Film Forward; • Cultural impact – engage and educate about the cultural impact and importance of the studio through access to events, services and facilities; and • Environmental, social and governance – commitment to working with partners to deliver programmes to provide equal opportunities for all, and a commitment to high quality pastoral care at work. 	<p>Impact on local job and skills.</p>	<p>Onsite provision and/or S106 / CIL contribution.</p>
<p style="text-align: center;">Noise and Vibration - Operational Fixed Plant & Building Services</p> <p>Measures to control noise from fixed mechanical plant to the required level would be inherent in the detailed design of the development and may include:</p> <ul style="list-style-type: none"> • Procurement of ‘quiet’ non-tonal plant; • Locate plant and air vents away from sensitive receptors; • Acoustic enclosures; • In-duct attenuators; • Acoustic louvres; and • Isolation of plant from building structures. 	<p>Impact of noise and vibration from fixed plant and building services to surrounding sensitive receptors.</p>	<p>Planning Condition</p>

Mitigation, Monitoring or Enhancement Measure	Effect being mitigated, monitored or enhanced	Method of Implementation
<p>Noise and Vibration - Studio and Backlot Noise A noise management plan for the Backlot Area will be required, which should include:</p> <ul style="list-style-type: none"> • Limiting high-noise filming to daytime or evening hours only wherever practical. In particular gunfire and explosions should be avoided post 23:00. • Communication lines to be provided to nearby residences advising of the type of activity and duration prior to the commencement of filming. • Establishment of a clear complaints procedure. <p>This will form part of the overall Backlot Management Plan.</p>	<p>Impacts of noise breakout from filming on the backlot area on to surrounding sensitive receptors.</p>	<p>Planning Condition</p>
<p>Landscape and Habitat Management Plan An Outline Landscape and Habitat Management Plan (LHMP) has been produced, with detailed LHMP secured via condition to safeguard the long-term ecological value of those habitats to be retained and created as part of the proposed Development. The LHMP shall be written in accordance with BS 42020:2013³ and developed alongside the detailed design of Site landscaping. The LEMP shall set out those management and maintenance prescriptions to be followed in order to ensure benefits for biodiversity in the long term. This will include provisions for waste / litter removal and the removal and control of the spread of invasive non-native species such as Japanese knotweed. The requirement for monitoring of habitats and species as necessary shall also be detailed.</p>	<p>To retain/enhance long- term ecological value of those habitats to be retained and created as part of the proposed Development</p>	<p>Planning Condition</p>

² BSI (2011) BS6187:2011 Code of practice for full and partial demolition. BSI.

³ BSI (2013): Biodiversity – Code of practice for planning and development. BS 42020:2013



APPENDIX I Habitats Regulations Appropriate Assessment (HRA)

Buckinghamshire Council

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Habitats Regulations Assessment (HRA)

Site: Land Adjacent South Side Marlow Road And A404 Junction, Westhorpe Park, Little Marlow, Buckinghamshire

Project: Full planning permission for production space and supporting buildings for screen-based media and associated services/industries. The development of approximately 168,718 sqm GEA total floorspace comprising : sound stages, workshops , office accommodation, studio hub associated outdoor space such as backlots and unit bases; entrance structures and reception; security infrastructure, mobility hub; cafes; parking; bridge; incidental supporting buildings; associated infrastructure; public art; upgraded vehicular access onto Marlow Road; new cycle and pedestrian accesses; a new cultural/educational/recreational building; a new community building and associated landscaping, publicly accessible recreational land and ecological and environmental enhancements/habitat creation

Ref: 22/06443/FULEA

Summary:

Buckinghamshire Council, as Local Planning Authority and Competent Authority, has carried out a Habitats Regulations Assessment as required by The Conservation of Habitats and Species Regulations 2017 (as amended) ('the Habitat Regulations'), to assess whether there are likely significant effects on the Chiltern Beechwoods Special Area of Conservation (SAC) and Burnham Beeches Special Area of Conservation (SAC) arising from this development, either alone or in combination with other plans and projects.

An Appropriate Assessment has been required in relation to air pollution effects on Chiltern Beechwoods SAC.

Buckinghamshire Council accepts the outcomes stated in the Shadow HRA, prepared May 2022 and the Technical Note- Habitats Regulations Assessment March 2023 (Appendix 8 – Addendum Planning Statement – HRA Technical Note). The Council as Competent Authority is satisfied that the development will not result in any adverse effect on the integrity of the Chiltern Beechwood SAC nor Burnham Beeches SAC, either alone or in-combination.

Informing individual Appropriate Assessment of Planning Applications and Permitted Development

Buckinghamshire Council's supporting documentation to the Wycombe Local Plan included a Habitats Regulations Screening report, September 2017, which concluded that the Wycombe District Local Plan will not result in an adverse air quality effect on the integrity of Chilterns Beechwoods SAC or the Burnham Beeches SAC at either modelled location. The Wycombe Local Plan is not predicted to adversely affect the Chilterns Beechwoods SAC either alone or in-combination with other plans or projects.

The ES accompanying this application and Shadow HRA prepared by Waterman, dated May 2022 and Technical Note 2023 submitted in support of the application screened in air quality as having the potential to result in likely significant effect in combination on the integrity of the conservation purposes of the Chilterns Beechwoods SAC.

In light of this, under the Habitat Regulations air quality impacts are screened in and as such a Stage 2 'Appropriate Assessment' has been carried out by Buckinghamshire Council as 'Competent Authority' of the impact on the Bisham Woods component of the Chiltern Beechwood SAC. This has concluded that there will be no adverse effects on the Chilterns Beechwoods SAC alone or in combination and there is no need for mitigation.

Appropriate Assessment of Planning Application reference number 22/06443/FULEA

1. The Conservation of Habitats and Species Regulations (2017)

In accordance with Regulation 63 of The Conservation of Habitats and Species Regulations (2017) a competent authority (in this case Buckinghamshire Council), before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which—

- a. is likely to have a significant effect on a European site... (either alone or in combination with other plans or projects), and
- b. is not directly connected with or necessary to the management of that site
- c. must make an appropriate assessment of the implications of the plan or project for that site in view of that site's conservation objectives.

A person applying for any such consent, permission or other authorisation must provide such information as Buckinghamshire Council may reasonably require for the purposes of the assessment or to enable it to determine whether an appropriate assessment is required.

Buckinghamshire Council must, for the purposes of the assessment, consult the Conservation Body, Natural England, and have regard to any representations made by that body. It must also, if it considers it appropriate, take the opinion of the general public, and if it does so, it must take such steps for that purpose as it considers appropriate. In the light of the conclusions of the assessment, and subject to Regulation 64 (Considerations of overriding public interest), Buckinghamshire Council may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site.

In considering whether a plan or project will adversely affect the integrity of the site, Buckinghamshire Council must have regard to the manner in which it is proposed to be carried out or to any conditions or restrictions subject to which it proposes that the consent, permission or other authorisation should be given.

2. Stages 1: Screening for Likely Significant Effects

Buckinghamshire Council accepts that this proposal is a 'plan or project' which is not directly connected with or necessary to the management of the Chiltern Beechwoods Special Area of Conservation or Burnham Beeches Special Area of Conservation.

Location in relation to relevant SACs:

The site is located within 2km of the Chiltern Beechwoods SAC (0.75km from Bisham Woods, 4.1km from Hollowhill and Pullingshill Woods, 9.9km away from Naphill Common) and 6.6km from Burnham Beeches SAC.

Potential Impact Pathways:

In terms of the proposed development, the main factors which could lead to potential impact pathways on the SACs are:-

Chiltern Beechwoods SACs:

- Impact on mobile species. Stag Beetles disperse up to 2km to breed before females return to where they have emerged (Bisham Woods).
- Recreational pressure. Bisham Woods has open access (Hollowhill and Pullingshill Woods do not have open access and can be ruled out for any further scrutiny).
- Water abstraction risk. All aspects of the woodland habitat depend on the maintenance of a favourable hydrological regime. Water abstraction can impact and modify this.
- Increased air pollution which may change the composition of soils and encourage more tolerant species at the expense of more sensitive plants and invertebrate communities, which can impact on larger animals too, by reason of impact on supporting habitats.

Burnham Beeches SAC:

- Recreational pressure. Burnham Beeches has open access.
- Water abstraction risk- all aspects of the woodland habitat depend on the maintenance of a favourable hydrological regime. Water abstraction can impact and modify this.
- Increased air pollution which may change the composition of soils and encourage more tolerant species at the expense of more sensitive plants and invertebrate communities, which can impact on larger animals by reason of impact on supporting habitats.

The screening exercise carried out in the shadow HRA submitted with the application identifies that:

Chiltern Beechwoods SAC (Bisham Woods):

- Mobile Species- likely significant effects can be ruled out alone.
- Recreational Pressure- likely significant effects can be ruled out alone.
- Water Abstraction- likely significant effects can be ruled out alone or in combination with other plans and projects.
- Air Pollution- likely significant effects cannot be ruled out and an Appropriate Assessment of the impact on the Bisham Woods component of the Chiltern Beechwoods SAC is required.

Burnham Beeches SAC:

- Recreational Pressure- likely significant effects can be ruled out either alone or in combination with other plans and projects.
- Water Abstraction- likely significant effects can be ruled out alone or in combination with other plans and projects.
- Air pollution- likely significant effects can be ruled out.

In response to concerns raised by Natural England in February 2023, the applicants Technical Note identifies additional measures and information that have been included in the application on visual effects and noise:

- Sufficient screening on the east boundary to ensure that the development does not detract from the semi-natural feel of the SANG. The screening will be required to be managed in perpetuity (minimum 80 years) to ensure that the development remains well screened in the long term;
- Noise surveys/modelling. The maximum acceptable noise limit on a SANG is 60dB and therefore the development should not be contributing to noise levels above this limit on the adjacent SANG.

The Technical Note provides an analysis of the impact on the SANG within the council owned Spade Oak land based on the LVIA submitted and conclude that *“ is not considered to impact on the viability of the SANG from a landscape impact perspective”*. In terms of noise it states:

“3.2 With regards to the proposed Development, the majority of the noise generating activities would take place within the sound screens themselves. These are buildings which are highly acoustically insulated so as to prevent noise break-in and break-out of the structures. Similarly, the majority of works associated with Site would take place within the buildings and as such noise associated with said activities would be minimal.

3.3. The key activities which would have the potential to generate noise which could potentially impact upon the SANG are HGV and vehicle movements around the proposed Development, construction of sets in the backlot area and filming in the backlot area. It should be noted that the backlot area is located over 1.2km to the west of Spade Oak Lake SANG.

3.4. Noise levels associated with HGV deliveries, construction of sets and filming in the backlot area have been completed and are presented within the submitted Environmental Statement (ES) (Chapter 11: Noise and Vibration) although it is noted that specific noise

levels within the SANG have not been presented. Based upon the predicted noise levels presented in the noise levels at the closest boundary of the SANG have been extrapolated and are presented below.”

- HGV Movements 40dB LAeq
- Construction in backlot area 50dB LAeq
- Filming in backlot area 32dB LAeq 3.5.

3.5 “With reference to the above it can be seen that noise levels generated by the proposed Development would fall significantly below those required within a SANG, and therefore the proposed Development would not result in undermining the mitigation required to address any incombination effects with Allocation BE2 - Hollands Farm “.

Additional Considerations on recreational pressure on Burnham Beeches

Whilst the Shadow HRA and Technical Note prepared by Waterman has screened out recreational pressure on Burnham Beeches SAC either alone or in combination, directly arising from the use as a film studio as proposed, the Council must have regard to the development of this site and the impact on the site’s ability to deliver the SANG mitigation to support development allocations in the Wycombe District Local Plan as an indirect affect on the integrity of the SAC.

In preparing the Wycombe District Local Plan, the Council needed to demonstrate that developments allocated in that plan, such as Hollands Farm and Slate Meadow in Bourne End, would not have an adverse impact on the Burnham Beeches Special Area of Conservation (SAC). The Council undertook an Appropriate Assessment to satisfy both the Council and Natural England that residents of the new developments had a suitable alternative natural greenspace (known as a SANG) to use rather than increase the recreational impact on Burnham Beeches.

The Appropriate Assessment concluded; *“Provided that the mitigation measures identified in the Local Plan are implemented, no adverse effects on the SACs integrity due to recreational pressures are foreseen, either as a result of the plan alone or in combination with other plans and programmes”*

In August 2021 the Council adopted a Development Brief for Hollands Farm allocation at Bourne End, policy ‘BE2’ of the Wycombe Local Plan. As part of the Development Brief an Appropriate Assessment was also undertaken to satisfy the Council as Competent Authority in consultation with Natural England that residents of the new development would have a SANG to use rather than increase the recreational impact on Burnham Beeches. A list of mitigation measures was identified at Little Marlow Lakes Country Park, utilising land within the Council’s ownership and the existing rights of way network, including improvements to footpaths/cycleways, provision of new signposts, Way markers and information boards, dog waste bins, benches and a new car park. This includes the site the subject of the application and improvements to footpaths within the site. It was deemed, in consultation with Natural England, that the mitigation identified in the Development Brief, would provide suitable SANG to support the Hollands Farm allocation in the Wycombe District Local Plan if the identified priorities are implemented.

Policy RUR4 of the Wycombe District Local Plan (2019) allocates the land the subject of this current application in its entirety for outdoor recreation. It is clearly set out in the adopted policy that any development within the country park should provide for environmental improvements, including the provision of publicly accessible open space, ecological and biodiversity enhancements, and contribute to the continued development and long-term management of the Country Park.

Policy RUR4 continues to apply to planning applications as part of the planning process. Policy RUR4 specifically states:

Planning permission will not be granted for development within the Country Park that has an adverse effect upon the amenities or setting the River Thames, watercourses, lakes, wet woodlands, adjoining conservation areas, or listed buildings, or which prejudices the function of the area for the purposes of a Country Park.

The Wycombe District Local Plan states at paragraph 5.5.22 *“By providing an alternative local Country Park destination, improvements to the Park provide an opportunity to offset the impacts of proposed housing growth at Bourne End and beyond on Burnham Beeches – a Special Area of Conservation. On the two strategic sites within this area (see BE1 and 2), where sufficient space to meet Natural England’s requirements cannot be provided on site, a S106 contribution will be sought to invest in the park, and access to it. Further improvements will also be eligible for CIL funding. This will assist in the wider delivery of green infrastructure in this part of the District. The Council will monitor how many developments are permitted within the District, which fall within a 5 km radius around Burnham Beeches, and if necessary, and in consultation with Natural England, the plan review can modify the policy approach to the Country Park.”*

A report to Cabinet on 11 October 2022 and subsequent report to the Growth Infrastructure & Housing Select Committee on 15 December 2022 resolved amongst other measures to develop a scheme and pursue formal designation of land within the Council’s ownership as a Country Park which as a minimum would be a Suitable Alternative Natural Greenspace (SANG) compliant facility. The resolution included that the Service Directors of Property and Assets, and Planning and Environment, in consultation with the Cabinet Member for Accessible Housing and Resources, be delegated authority to negotiate and agree a suitable restoration plan in consultation with Natural England for the Spade Oak Lake site which would be SANG compliant. The area of land identified does not include the current application site.

Work has since progressed on developing the suitable plan for focusing the SANG on Spade Oak within land under the Council’s control, including visitor surveys. A report on survey outcomes and mitigation measures is being prepared and discussions have taken place with Natural England on a route for the circular walk for the SANG. A management plan will then be prepared by the end of 2023 to deliver a SANG on the Spade Oak site. As a result of this commitment by the Council and the progress to date to deliver the Spade Oak SANG to address any risk of undermining of the recreational pressure mitigation in place for Allocation BE2 (Hollands Farm) and any Likely Significant Effects that would result either alone or in-combination, it is concluded that whilst there is the potential for the delivery of suitable alternative mitigation on the land within the Council’s ownership to meet the Local

Plan commitments for SANG to support the Hollands Farm and Slate Meadow allocations, and not rely on the land within the Marlow Film studio red edge land for such mitigation there is no certainty at this stage over its delivery.

Natural England advised that a revised Suitable Alternative Natural Greenspace (SANG) proposal including a masterplan and SANG Management Plan is required in order to remove NE's objection to the proposed application.

In terms of visual impact and noise affecting the SANG identified to support the Hollands Farm allocation in the Wycombe District Local Plan likely significant effects cannot be ruled out.

Thus the conclusions relating to the impact of the development on recreational pressure on Burnham Beeches is that likely significant effects cannot be ruled out either alone or in combination with other plans and projects.

Screening Conclusion:

At the screening stage Buckinghamshire Council cannot rule out any likely significant effects on the Chiltern Beechwoods Special Area of Conservation (alone or in combination with other plans or projects) because the proposal could undermine the Conservation Objectives of the Chiltern Beechwoods Special Area of Conservation by reason of air pollution. The impact on recreational pressure cannot rule out any likely significant effects on recreational pressure on Burnham Beeches cannot be ruled out either alone or in combination with other plans and projects arising from the uncertainty over the delivery of the SANG on Spade Oak.

An Appropriate Assessment of this impact is necessary.

STAGE 2 APPROPRIATE ASSESSMENT

A) AIR POLLUTION IMPACT ON CHILTERN BEECHWOODS SAC:

Based on the information provided by the applicant, Buckinghamshire Council must decide whether or not an adverse effect on site integrity (alone or in combination with other plans or projects) can be ruled out. Mitigation may be able to be provided so that the proposal can reduce adverse effects.

Methodology:

Air pollution analysis has been carried out and detailed in the Air Quality section of the submitted Environmental Statement (ES). This took account of how predicted growth in the area could lead to changes in traffic over the foreseeable future (as detailed in the Transport and Access section of the ES). The analysis has been based on levels of nitrogen oxide, ammonia, nitrogen and acid deposition. Predicted values for each pollutant were modelled at two points- at the kerbside and at 200m (to reflect values at their highest and lowest). All values also reflect the impact of the project in combination with other plans and projects.

Results:

- Nitrogen oxides- there is no reasonable doubt that an adverse effect can be ruled out alone or in combination. There is no need for mitigation or further assessment.
- Nitrogen deposition- at kerbside the result lies marginally above the 1% threshold where adverse effects are ruled out (1.5%). However, this is similar to a 1.38% result encountered during the HRA process at Royal Borough of Windsor and Maidenhead, whereby it was concluded (following consultation with Natural England) that adverse effects could be ruled out. As a result, in relation to this assessment of nitrogen deposits, it is considered that the results show that there is no reasonable doubt that an adverse effect can be ruled out alone or in combination. There is no need for mitigation or further assessment.
- Ammonia- there is no reasonable doubt that an adverse effect can be ruled out alone or in combination. There is no need for mitigation or further assessment.
- Acid- here is no reasonable doubt that an adverse effect can be ruled out alone or in combination. There is no need for mitigation or further assessment.

B) RECREATIONAL PRESSURES ON BURNHAM BEECHES

Based on the information provided by the applicant, Buckinghamshire Council must decide whether or not an adverse effect on site integrity (alone or in combination with other plans or projects) can be ruled out. Mitigation may be able to be provided so that the proposal can reduce adverse effects.

Having regard to the information provided by the applicant and outlined above and the advice from Natural England, the Council cannot rule out the likely significance effects on the Burnham Beeches Special Area of Conservation (alone or in combination with other plans or projects) arising from the development of this site and the ability to deliver the SANG mitigation to support development allocations in the Wycombe District Local Plan as an indirect affect on the integrity of the SAC. This is because there is a risk of undermining of the recreational pressure mitigation in place for Allocation BE2 (Hollands Farm) and have an adverse impact on the National Protected Habitat and Species at Burnham Beeches Special Area of Conservation (SAC). The proposals are therefore contrary to the NPPF and the Habitats Regulations 2017.

Conclusion of the Appropriate Assessment:

The Appropriate Assessment concludes that the air quality analysis has shown that adverse effects on the integrity of the Bisham Woods component of the Chiltern Beechwoods SAC can be ruled out. Although the development will lead to some increases in airborne pollution, these either do not exceed established thresholds, or for nitrogen, where there is exceedance, this is modest with effects on the ground not visible, measurable and it is implausible that the objectives to secure the species composition, distribution and abundance of the beech forest, could be compromised. Consequently, there is no

reasonable scientific doubt that adverse effects on the integrity of Chiltern Beechwoods, in combination, can be avoided. The air quality analysis is considered to be consistent with the outcome of the Wycombe Local Plan HRA.

In relation to recreational pressure, the Council cannot rule out the likely significance effects on the Burnham Beeches Special Area of Conservation (alone or in combination with other plans or projects) arising from the development of this site and the ability to deliver the SANG mitigation to support development allocations in the Wycombe District Local Plan as an indirect affect on the integrity of the SAC

The Appropriate Assessment is considered to be in accordance with the Habitats Regulations 2017.

Overall Conclusion:

The Council does not adopt the findings of the shadow HRA dated May 2022 and Technical Note 2023 submitted with planning application 22/06443/FULEA.

The Council as Competent Authority, in consultation with Natural England, is satisfied that the development is likely to have a significant effect upon the integrity of the Chiltern Beechwood Special Area of Conservation with the result that the Council would be required to refuse this planning application without the certainty over delivery of an alternative mitigation to meet the Local Plan commitments for SANG to support the Hollands Farm and Slate Meadow allocations.

Case Officer: John Fannon

Date: 12.10.2023

Clearing Officer: Susan Kitchen

Date: 12.10.2023

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