

APPENDIX A: Consultation Responses and Representations

Consultee Consultation Responses

Archaeology – 26 August 2022

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

Our response will take Part A and Part B separately.

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

Historic Environment Record (HER) information

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

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

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

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

Archaeological and related interests

Relatively little archaeological investigation has been undertaken in the vicinity of the Part A area. Ground works for development and landscaping may impact buried archaeological remains. If planning permission is granted for this development, then it may harm a heritage asset's significance so a condition should be applied to require the developer to secure appropriate investigation, recording, publication and archiving of the results in conformity with NPPF paragraph 205. With reference to the NPPF we therefore recommend that any consent granted for this development should be subject to a condition along the following lines:

Part A

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

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

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

Historic Environment Record (HER) information

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

HER reference	Designation Status*	Description
0689200000	PLN	Field N of Warren House: Two rectangular enclosures or field boundaries visible on aerial photographs from 1989 north of Warren House

0150500000	PLN	STRAWBERRY WOOD, BLACK PARK: Linear earthwork found in Strawberry Wood, Black Park and thought to either be a Roman road or a medieval parish boundary bank
0991800000	HER	Areas 2 & 3, Project Pinewood Site: Possible ditched settlement enclosures, pits and field boundary ditches found by geophysical survey but not confirmed by subsequent trial trenching.
0995700000	PLN	Area 4, Chandlers Hill: Iron Age to medieval pits, ditches, and sunken featured building identified by geophysical survey and excavation

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

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

Archaeological and related interests

We recognise that much of the proposed development site has been subject to quarrying and this activity would have significantly impacted any buried archaeological assets; however, the Environmental Statement for application PL/20/3280/OA recognises that there are small areas where ground works were not undertaken. The HER records features and finds from several periods in the vicinity and we would expect the areas of previously undisturbed ground to have archaeological evaluation in the form of trial trenching to assess the buried archaeological potential of these areas and the extent and significance of any remains. This work could be undertaken by condition and could lead to further investigation.

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

Part B

No development shall take place, unless authorised by the Planning Authority, until the applicant, or their agents or successors in title, have undertaken archaeological evaluation in form of trial trenching in areas of previously undisturbed ground, in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the planning authority. This work may lead to further investigation in the form of an excavation.

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

Archaeology – 9 January 2023

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

Thank you for consulting the Buckinghamshire Council Archaeological Service on the above proposal. We maintain the local Historic Environment Record and provide expert advice on archaeology and related matters. We have nothing to add to our previous letter dated the 26th August 2022.

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

British Pipeline Agency – 15 August 2022

Thank you for the consultation regarding the above planning application.

The proposed works are in close proximity to a high-pressure petroleum pipeline system and BPA wish to ensure that any works in the vicinity of the pipeline are carried out in accordance with our safety requirements (www.linewatch.co.uk). Please find attached two GIS maps of our pipelines in relation to the above application. Please note that these only show the indicative location of our assets, and exact locations can only be determined on site. There is also a CP groundbed and related cabling located at Alderbourne Farm which must be protected in addition to the pipelines.

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

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

The most important points are:

- These Pipelines carry refined petroleum at extremely high pressure.
- Any construction must be kept a minimum of 3m from the pipelines.
- All excavations (including hand trial holes) within 3m of the pipeline must be approved and supervised by BPA.
- The exact location of the pipeline to be marked by BPA in consultation with the developer prior to detailed design.

- Nominal cover is only 0.9m (3').
- Normal vertical clearance for new services is 600mm.
- These pipelines are protected by cathodic protection and you should consult with BPA if you are laying any services (with or without cathodic protection).
- Heavy vehicular crossing points to be approved before use across the easement.
- Tree planting is prohibited within the easement.
- No buildings can be located within the pipeline easement.
- No lowering or significantly raising of ground level throughout the easement.
- A continuous BPA site presence will be required for works within the easement.
- Utility crossings may require a formal crossing consent
- BPA do not charge for the first three days of supervision (this includes site meetings). After that, BPA will charge for any future supervision.

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

- **A confirmed or proposed programmed start date for the works**
- **A detailed description of the proposed works**
- **A plan of the work area,**
- **Drawings and a method statement for the written approval of BPA.**

British Pipeline Agency – 22 December 2022

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

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

Climate Change – 5 January 2023

Preamble

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

Sustainability & Energy Statement

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

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

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

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

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

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

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

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

Energy Document

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

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

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

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

Conclusion

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

Condition 1

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

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

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

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

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

Condition 2

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

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

Condition 3

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

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

Condition 4

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

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

Condition 5

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

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

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

Condition 6

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

Condition 7

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

Colne Valley Regional Park – 28 September 2022

Response to proposed development at Pinewood South and Alderbourne Farm

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

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

The Colne Valley Regional Park has six objectives:

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

Landscape

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

The creation of a Green Infrastructure Strategy

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

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

Summary of response

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

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

With regard to the nature reserve:

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

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

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

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

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

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

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

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

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

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

Mitigation could be improved by:

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

Colne Valley Regional Park – 20 January 2023

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

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

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

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

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

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

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

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

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

Colne Valley Regional Park – 2nd February 2023

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

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

Country Parks – 1 December 2022

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

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

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

Backlot Areas. We know Pinewood and the film industry very well and we are very concerned about the potential of temporary backlot areas being developed adjacent to the Black Park boundary while they are waiting to construct the actual sound stages. The park already has two backlot areas immediately adjacent to it from the existing studio complex; these are often very messy and aesthetically look unpleasant when viewed from the park. They are also prone to produce litter that blows into the park through the fence and have been the source of several pollution incidents that have found their way into park watercourses, backlots can also create additional noise and light pollution. Can a condition be put in place that in the event of Pinewood not developing the studio facilities or Backlots at Alderbourne Farm, they cannot use the Pinewood South site as a Backlot?

Any proposed development should locate backlots away from the Black Park boundary for these reasons and to try to ensure that the view from the park towards the proposed development is as aesthetically pleasing as possible.

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

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



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

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

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

Commercial Relationship with Black Park. Pinewood Studios and Black Park have always had a close and good working relationship, Black Park benefits commercially from the proximity of Pinewood Studios and likewise Pinewood Studios offer to film productions is

enhanced by Black Park. Opportunities exist with this development to build on this and also bring wider benefits to the UK film industry and park users. The access route into Black Park from the studios through Taylors Gate has potential to be improved, so that film productions can move vehicles and equipment easily between the park and the studios. This will reduce the number of vehicle movements associated with filming on local roads and also reduce distances that vehicles have to travel internally in Black Park. We would also like the developer to explore the provision of an access route into Black Park from the Pinewood South development site, there are several places where the internal road network could be extended to the country parks boundary and fairly easily link into our existing track network. We would welcome further discussions on this.

Wider Impacts on Black Park as a visitor destination. Black Park is a regional visitor destination attracting in excess of 750,000 visitors a year; it facilitates the employment of approx. 125 people, predominantly from the local area and contributes over £1 million to the local economy annually. Langley Park which is adjacent to Black Park also attracts over 250,000 visitors a year and is a significant attraction in its own right too. It is very important that this is recognised and it is understood that the local road network is already serving to very well used and busy visitor destination. Visitor numbers to the Country Parks are also growing and look set to grow for a number of years. The proposed development, even without the visitor attraction element, will still add considerable pressure to the local road network. The A412 is of particular concern as it is a fast and dangerous road, with accidents occurring regularly at the Black Park road junction. There is also considerable use of the laybys adjacent to Black Park and Langley Park as parking areas by people not wanting to use the main car parks. This was demonstrated by survey work commissioned by highways development control and delivered by Temple in relation to the previous development proposal. The concern is there are regularly cars slowing suddenly trying to find spaces, cars stopping and reverse parking against the flow of traffic, parking on acceleration lanes and slip roads, parking on verges and pedestrian footways. Increased volumes of traffic on this road due to the construction of and operation of the proposed development will increase the risk to all road users on the A412 and also create additional noise, disturbance and air quality issues for both Black Park and Langley Park. We would want road safety improvements on the A412 to be part of this proposed development and a key consideration of the planning process. Issues with lay-bys and slip-road need addressing and with another junction being created on the A412 we would want the speed limit reduced to 40mph.

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

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

Summary

Holding Objection; Insufficient GCN Information Provided.

Further Information Required:

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

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

Discussion

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

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

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

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

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

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

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

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

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

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





Informatives

Protection of great crested newts and their breeding/resting places

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

Legislation, Policy and Guidance

Lifespan of Ecological Reports and Surveys

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

Reasonable Likelihood of Protected Species

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

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

Section 99 of ODPM Circular 06/2005 states:

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

Great crested newts

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

Ecology Newt Officer– 7 November 2022

Summary

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

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

Discussion

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

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

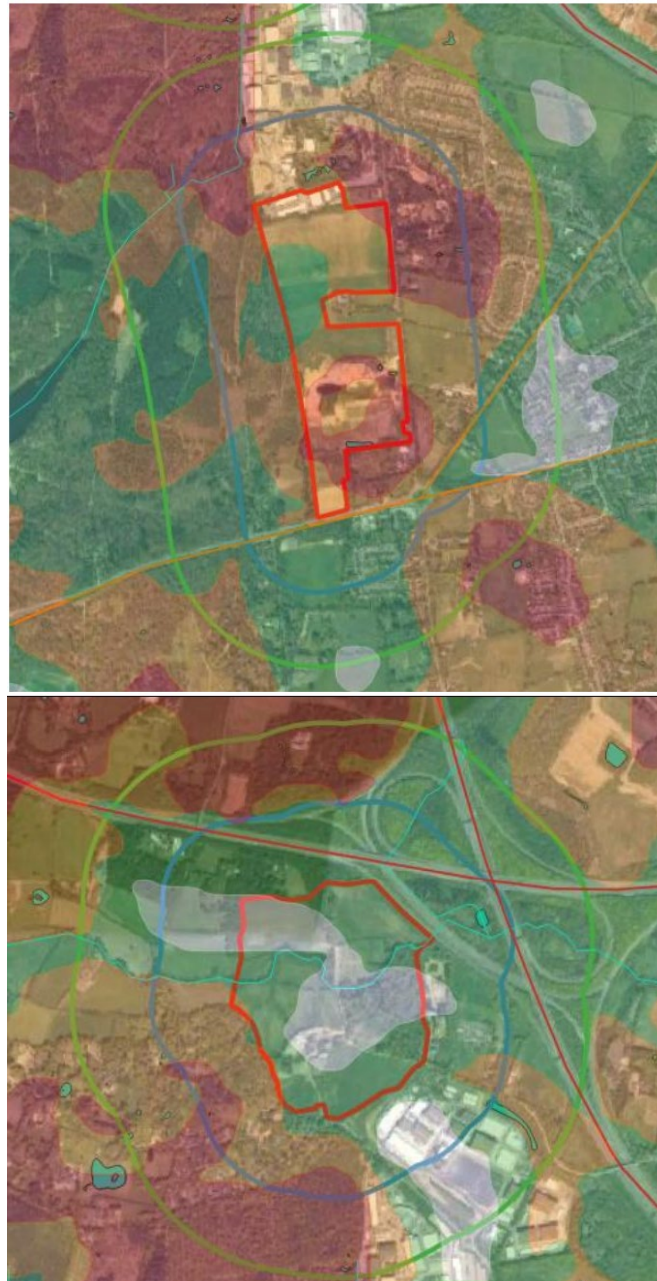
During surveys in spring 2022, no GCN were encountered within the red line at Alderbourne Farm. The only positive survey result in the 500m buffer zone is in Black Park. This pond (P3 on the survey) is 450m distant from the developable area and surrounded by high quality habitat. As for Ponds P5 to P9,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

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

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

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

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



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Ecology – 16 January 2023

Summary

No objection, subject to conditions

Discussion

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

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

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

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

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

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

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

Pinewood South

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

Alderbourne Farm

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

Site Designations

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

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

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

Ancient Woodland

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

NERC Act Section 41 Habitat of Principal Importance

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

Biological Notification Site

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

Biodiversity Opportunity Area

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

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

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

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

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

Existing Habitats

Pinewood South

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

Alderbourne Farm

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

Biodiversity Net Gain

Background, Policy and Legal Requirements

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

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

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

Applying the Mitigation Hierarchy (Principle 1 of achieving BNG)

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

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

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

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

Irreplaceable Habitats

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

Proposed Development

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

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

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

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

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

Construction Environmental Management Plan

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

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

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

Proposed Ecological Impacts

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

Timetables

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

Avoidance and Mitigation Measures

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

On-site Personnel & Training

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

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

Monitoring, Compliance, Contingency and Emergency Measures

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

Landscape and Ecological Management Plan

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

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

- Description and evaluation of features to be managed.
- Ecological trends and constraints on site that might influence management.
- Aims and objectives of management which will (without limitation) include the provision of biodiversity net gain within the Site as shown within the Biodiversity Gain Plan
- Appropriate management options for achieving aims and objectives.
- Prescriptions for management actions.
- Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).
- Details of the body or organization responsible for implementation of the plan.
- Ongoing monitoring and remedial measures.

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

Protected Species

Bats

Pinewood South

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

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

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

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

Alderbourne Farm

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

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

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

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

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

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

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

Nesting Birds

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

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

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

Badger

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

Hazel dormouse

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

Otter and Water vole

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

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

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

Reptiles

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

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

Amphibians

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

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

Invertebrates

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

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

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

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

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

Artificial Lighting

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

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

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

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

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

Legislation, Policy and Guidance

European Protected Species Licensing

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

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

1. the activity to be licensed must be for imperative reasons of overriding public interest or for public health and safety;

2. there must be no satisfactory alternative; and
3. favourable conservation status of the species must be maintained.

Together with the ecologist's report, which answers test 3, the applicant should provide written evidence for tests 1 & 2. This can be contained within the ecological report or as separate document.

If the competent authority is satisfied that the three tests can be met, it should impose a planning condition preventing the development from proceeding without first receiving a copy of the EPS licence or correspondence stating that such a licence is not necessary.

This approach ensures compliance with the Conservation of Habitats and Species Regulations 2017(as amended) and enables a local planning authority to discharge its obligations under the Crime and Disorder Act and its wider duties under Section 40 of the Natural Environment and Rural Communities Act 2006 in relation to protected species.

Ancient Woodland

The Natural England and Forestry Commission Standing Advice ([Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK \(www.gov.uk\)](http://www.gov.uk)) for ancient woodland, ancient trees and veteran trees is a material planning consideration for local planning authorities (LPAs). Decisions have to be made in line with paragraph 180 (c) of the NPPF.

Paragraph 180c of the NPPF states that: "Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons 63 and a suitable compensation strategy exists.

(63) For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.

NERC Act Section 41 Habitat and Species of Principal Importance

Local planning authorities have a duty to conserve biodiversity under the Natural Environment and Rural Communities Act 2006 (NERC Act 2006).

The NERC Act 2006 requires that the Section 41 habitat and species list be used to guide decisionmakers, such as public authorities, in implementing their duty under Section 40 of the NERC Act 'to have due regard' to the conservation of biodiversity when carrying out their normal functions.

Biological Notification Site (BNS)

Paragraph 179 of the National Planning Policy Framework (NPPF) states "To protect and enhance biodiversity and geodiversity, plans should:

(a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity 61 ; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation 62 ; and

(b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.”

Biodiversity Net Gain

The Environment Act 2021 sets out the key components of mandatory biodiversity gain:

- Amends Town & Country Planning Act (TCPA);
- Minimum 10% gain required calculated using the Biodiversity Metric & approval of a biodiversity gain plan;
- Habitat secured for at least 30 years via planning obligations or conservation covenants;
- Delivered on-site, off-site or via a new statutory biodiversity credits scheme; and
- National register for net gain delivery sites

Paragraph 120a of the National Planning Policy Framework (NPPF) states: *“Planning policies and decisions should: a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside”*

Paragraph 174d of the NPPF requires that: *“Planning policies and decisions should contribute to and enhance the natural and local environment by ... minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressure”.*

The NPPF in section 179b states: *“promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.”*

Paragraph 180d of the NPPF states that: *“When determining planning applications, local planning authorities should apply the following principles...development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.”*

Biodiversity Net Gain Supplementary Planning Document

The BNG SPD was adopted by Buckinghamshire Council. It sets out a Buckinghamshire process for achieving net gain and aids planning applicants in ensuring their development would result in a biodiversity net gain. It also sets out a Buckinghamshire process for compensating for losses of biodiversity using off-site habitats and guides landowners in offering their land for BNG.

Core Policy 9: Natural Environment - South Bucks District Core Strategy

Buckinghamshire Council resolved to withdraw the Chiltern and South Bucks Local Plan 2036 on 21st October 2020. The Core Strategy for the South Bucks District area (adopted February 2011) 'Core Policy 9: Natural Environment' states that: *"The highest priority will be given to the conservation and enhancement of the natural beauty of the Chilterns Area of Outstanding Natural Beauty, and the integrity of Burnham Beeches Special Area of Conservation. The conservation and enhancement of the Chilterns AONB and its setting will be achieved by ensuring that all development complies with the purposes of the AONB and its Management Plan.*

The conservation and enhancement of Burnham Beeches SAC, and its surrounding supporting biodiversity resources, will be achieved through restricting the amount of development in close proximity to the site, and ensuring that development causes no adverse effect on the integrity of the 13 of 16 SAC. Further details on mechanisms for achieving this will be given in the Development Management DPD.

More generally, the landscape characteristics and biodiversity resources within South Bucks will be conserved and enhanced by:

- *Not permitting new development that would harm landscape character or nature conservation interests, unless the importance of the development outweighs the harm caused, the Council is satisfied that the development cannot reasonably be located on an alternative site that would result in less or no harm and appropriate mitigation or compensation is provided, resulting in a net gain in Biodiversity.*
- *Seeking the conservation, enhancement and net gain in local biodiversity resources within the Biodiversity Opportunity Areas, on other non-designated land, on rivers and their associated habitats, and as part of development proposals.*
- *Maintaining existing ecological corridors and avoiding habitat fragmentation.*
- *Conserving and enhancing landscapes, informed by Green Infrastructure Plans and the District Council's Landscape Character Assessment.*
- *Improving the rural/urban fringe by supporting and implementing initiatives in the Colne Valley Park Action Plan.*
- *Seeking biodiversity, recreational, leisure and amenity improvements for the River Thames setting where opportunities arise, for example at Mill Lane (see Core Policy 15).*

Further guidance on the protection and enhancement of landscape and biodiversity resources will be given in the development Management DPD."

Planning Obligation (Section 106)

Biodiversity Net Gain Scheme

A planning obligation will be required to secure the nature reserve and a Biodiversity Gain Scheme for application PL/21/4074/FA – Five Points Roundabout Junction Of A412 as the nature reserve will be also the offset site for that separate application. The land must be secured and managed for Biodiversity Net Gain for a minimum of 30 years.

The council will also require a monitoring fee to ensure the outcomes of the Biodiversity Net Gain Scheme are achieved. The council has draft section 106 wording for this purpose which can be requested from the Ecology Team or Legal Team.

Conditions

Control to ensure EPS licence is provided ahead of commencement

The following works shall not in any circumstances commence unless the local planning authority has been provided with either: a) a licence issued by Natural England pursuant to Regulation 53 of The Conservation of Habitat and Species Regulations 2017 (as amended) authorising the specified activity/development to go ahead; or b) a statement in writing from a suitably qualified ecologist to the effect that they do not consider that the specified activity/development will require a licence. Reason: To comply with the requirements of The Conservation of Habitats and Species Regulations 2017 (as amended) and to protect species of conservation importance.

Relating to the EPS licence and the safeguarding of bats an additional condition to secure the plans of the purpose-built bat loft building in the nature reserve is also required.

Lighting design strategy for light-sensitive biodiversity

Prior to occupation, a “lighting design strategy for biodiversity” shall be submitted to and approved in writing by the local planning authority. The strategy shall:

- 1. identify those areas/features on site that are particularly sensitive for bats and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and*
- 2. show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.*

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

Reason: To comply with the requirements of The Conservation of Habitats and Species Regulations 2017 (as amended) and to protect species of conservation importance.

Construction Environmental Management Plan

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

- 1. Risk assessment of potentially damaging construction activities.*
- 2. Identification of "biodiversity protection zones".*
- 3. Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).*
- 4. The location and timing of sensitive works to avoid harm to biodiversity features.*
- 5. The times during construction when specialist ecologists need to be present on site to oversee works.*
- 6. Responsible persons and lines of communication.*
- 7. The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.*
- 8. Use of protective fences, exclusion barriers and warning signs.*
- 9. Current soil conditions of any areas designated for habitat creation and detailing of what conditioning must occur to the soil prior to the commencement of habitat creation works (for example, lowering of soil pH via application of elemental sulfur);*
- 10. Descriptions and mapping of all exclusion zones (both vehicular and for storage of materials) to be enforced during construction to avoid any unnecessary soil compaction on area to be utilised for habitat creation;*
- 11. Details of both species composition and abundance where planting is to occur;*
- 12. Proposed management prescriptions for all habitats for a period of no less than 30 years*
- 13. Assurances of achievability;*
- 14. Timetable of delivery for all habitats; and*
- 15. A timetable of future ecological monitoring to ensure that all habitats achieve their proposed management condition as well as description of a feed-back mechanism by which the 15 of 16 management prescriptions can be amended should the monitoring deem it necessary. All ecological monitoring and all recommendations for the maintenance/amendment of future management shall be submitted to and approved in writing by the Local Planning Authority.*

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

Reason: To ensure the protection of priority habitats and protected species during construction, and that the development achieves a net gain in biodiversity.

Landscape and Ecological Management Plan (LEMP)

No development shall take place (including demolition, ground works, vegetation clearance) unless and until the Landscape and Ecological Management Plan (LEMP) has been submitted to and approved in writing by the local planning authority. The content of the LEMP shall include the following.

- 1. Description and evaluation of features to be managed.*
- 2. Ecological trends and constraints on site that might influence management.*
- 3. Aims and objectives of management which will (without limitation) include the provision of biodiversity net gain within the Site as shown within the Biodiversity Gain Plan*
- 4. Appropriate management options for achieving aims and objectives.*
- 5. Prescriptions for management actions.*
- 6. Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).*
- 7. Details of the body or organization responsible for implementation of the plan.*
- 8. Ongoing monitoring and remedial measures.*

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall be for no less than 30 years. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details.

Reason: To ensure appropriate protection and enhancement of biodiversity, to make appropriate provision for natural habitat and biodiversity enhancements within the approved development and to provide a reliable process for implementation and aftercare.

Biodiversity Monitoring Strategy

No development shall take place, including demolition, ground works and vegetation clearance, until a biodiversity monitoring strategy has been submitted to, and approved in writing by, the local planning authority. The purpose of the strategy shall be to report to the Local Planning Authority on progress towards achieving Biodiversity Net Gain. The content of the Strategy shall include the following.

- 1. Aims and objectives of monitoring to match the stated purpose.*
 - 2. Identification of adequate baseline conditions prior to the start of development.*
 - 3. Appropriate success criteria, thresholds, triggers and targets against which the effectiveness of the various conservation measures being monitored can be judged.*
- 16 of 16*
- 4. Methods for data gathering and analysis.*
 - 5. Location of monitoring.*
 - 6. Timing and duration of monitoring.*
 - 7. Responsible persons and lines of communication.*
 - 8. Review, and where appropriate, publication of results and outcomes.*

A report describing the results of monitoring shall be submitted to the local planning authority at intervals identified in the strategy. The report shall also set out (where the results from monitoring show that conservation aims and objectives are not being met) how contingencies and/or remedial action will be identified, agreed with the local planning authority, and then implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The monitoring strategy will be implemented in accordance with the approved details.

Reason: to ensure that the development achieves a net gain in biodiversity.

If the development is delivered in phases there is also this additional condition:

Phased Biodiversity Net Gain Plan

Condition: No development shall take place (including demolition, ground works, vegetation clearance) for each phase of development unless and until the Biodiversity Gain Plan (BGP) demonstrating that Biodiversity Net Gain will be achieved for each phase has been submitted to and approved in writing by the local planning authority. The BNG plan shall include the following:

- *information about the steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the onsite habitat and any other habitat,*
- *the pre-development biodiversity value of the onsite habitat,*
- *the post-development biodiversity value of the onsite habitat,*
- *As regards off-site provision it would also require any registered offsite biodiversity gain allocated to the development and the biodiversity value of that gain in relation to the development,*
- *any biodiversity credits purchased for the development, and*
- *such other matters than may be relevant.*

Reason: To ensure the development achieves Biodiversity Net Gain

Economic Growth and Regeneration – 30 September 2022

Comments on application:

Introduction

The comments that follow are based on our interpretation of the local economic benefits as outlined in the application and supporting documentation (in particular, Document 7 Leading Recovery and Growth and Document 13 Social and Economic Impact Report). They do not take into account any wider planning considerations.

Fit with Local Strategy

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

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

Furthermore, the LIS seeks to boost the take up of industry placements in disciplines befitting the Buckinghamshire economy and to facilitate apprenticeships and employment-led models to address growing skills needs. It also refers to the need to support scale ups and support inter-network innovation and promotion of cross sector ambitions and to develop new and enhanced high quality incubation and coworking spaces. The proposed Centre Stage, incorporating an Education Hub managed by the NFTS and a Business Hub overseen by Buckinghamshire Business First, would help to support these aims.

The Buckinghamshire Economic Recovery Plan, produced by the Local Enterprise Partnership in 2020, outlines the actions needed to ensure businesses and residents across Buckinghamshire can adjust to changing economic circumstances associated with, and accelerated by, the Covid-19 pandemic. The Plan emphasises the ongoing, and increased, importance of the county's four key assets in driving recovery. Specific reference is made in the Plan to Pinewood, with support for a Global Growth Hub and new studio development on the site.

The Buckinghamshire Strategic Vision, produced by the Buckinghamshire Growth Board, sets out the ambition for a thriving, resilient and successful county. Specific reference is made to the role of Buckinghamshire's growth sectors in underpinning this and the aim to capitalise on existing specialisms and economic hubs, of which the creative sector and Pinewood is one. The Vision further highlights the importance of skills, local employment opportunities and flexible commercial space to support the growth of SMEs. Again, through the provision of skills and education; support for businesses and the creation of significant employment opportunities, this proposal will support the delivery of the Strategic Vision.

Economic Benefits

The supporting documentation clearly articulates the value of the film and television sector to the national, regional and local economy, particularly in relation to levels of employment and inward investment. It articulates the role that the proposal could play in supporting the ongoing growth of the sector, in addressing the shortfalls in studio space and addressing skills challenges.

Employment and Skills

It is estimated that through investment of approximately £800 million, the proposal will create 3,000 construction jobs, over 8,000 jobs (direct and indirect) once operational and will contribute £640 million to economic productivity (GVA) annually. It is particularly encouraging that a range of jobs will be created, with a focus on “sustainable and well-paid” employment. Further detail on the type of jobs to be created would be beneficial. This should also outline opportunities for Apprenticeships, Traineeships, work experience - all to have a focus on people of all ages.

To maximise the local economic impact of the scheme, we would encourage consideration to be given to efforts to ensure local residents can be assisted to secure the employment opportunities available. Links with the CITB (in the construction phase), DWP/Jobcentre Plus and Restart providers should be encouraged, alongside widespread and early promotion of activities within neighbouring areas.

The NFTS is a well-recognised and respected provider of tertiary and vocational education in the creative sector and this proposal affords an opportunity for them to build upon and enhance their existing curriculum offer in Buckinghamshire. The proposal for an Education Hub will see a range of courses offered, from craft skills training and production training, to residentials and CPD for those already employed in the sector.

As the Buckinghamshire Local Industrial Strategy highlighted at the time of its publication, the population aged 20-30 years in Buckinghamshire was 10% below the national average. In part, this can be attributed to the loss of young people to universities outside of the county, who on graduation, do not return to Buckinghamshire. As such, it is important that there are opportunities available to young people within the county, that they are aware of such opportunities, and that they have the support to access these. We therefore welcome the proposals for engagement with the Bucks Skills Hub and schools outreach, including careers talks, tours, and short courses.

Through such provision and engagement, the proposal will also support a number of the activities identified in the recent British Film Industry Skills Review, particularly around bridges from education to industry; industry led investment in training and more comprehensive careers information.

It is further proposed that the Education Hub offers adult education, training and retraining provision. Pinewood have experience of involvement in such schemes, for example through the Aviation to Film programme which supported those who lost jobs in the aviation sector to retrain to secure alternative employment in the film and television sector.

As the supporting information shows, unemployment levels remain above pre-pandemic levels, so ensuring residents have the skills needed to secure employment within growing sectors is important. Similarly, through the new Opportunity Bucks programme, the Council is prioritising the levelling up agenda and seeks to address disparities in opportunities through a focus on ten wards with the highest levels of deprivation. Jobs and careers and education and skills are two key themes of the programme, and again,

through the focus on skills development as well as the employment to be created, this proposal can contribute to the aims of Opportunity Bucks.

Enterprise

It is suggested that the Business Growth Hub will support the development of 50 new enterprises through a combination of pre-start up and start up support, incubation space, business accelerator programmes and film/media related space. As a county dominated by small and micro enterprises, it is important that support and provision is available. Bucks Business First have a strong track record of delivering assistance to Buckinghamshire's businesses, so their commitment to the Hub is encouraging. Opportunities for businesses both at the Hub and across the sector generally, to take advantage of procurement opportunities, to collaborate with each other, and to capitalise on the creative and digital clusters that exist across and close to the county, would be welcomed.

Impact on Town Centres and Placemaking Considerations

The proposed development will generate increased traffic movements across the local area and we will be looking to engage with colleagues in Transport to ensure the measures proposed to secure greater access by public transport and more active travel (through footway and cycleway improvements) are sufficient.

Our aim will be to ensure that the potential benefits to those town centres in close proximity to the development are not outweighed by the disadvantages resulting from increased traffic generation and any loss of green space. We are interested in exploring how connectivity between the site and the town centres can be enhanced, in a way that not only increases mobility but contributes to wider and longer term ambitions and regeneration strategies for these centres.

We would like to see consideration given to how employees at the studios be encouraged to play a more active and sustainable role in the local area, including supporting high street businesses. Also, how can we understand and capitalise on the needs and aspirations of those working in the film and TV sector to influence our approach to place making and vibrant town centres? With a specialist Regeneration team now in place within Economic Growth and Regeneration, we would request involvement in wider discussions around place making and connectivity.

Summary and Recommendations

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

The proposal is of national significance and will be of significant benefit to the national, regional and local economies. This is particularly valuable as the economy continues to recover from the impact of the Covid19 pandemic and faces ongoing uncertainties.

The investment will support significant job creation, directly and indirectly, in both the construction and operational phases. Through building on existing educational and business networks, this proposal will offer support for new and growing enterprises and will support the skills of both those looking to enter, as well as those already working in the sector. This investment will cement Pinewood at the heart of the UK film industry and will contribute to the growth of the local economy. The Economic Growth and Regeneration Team therefore welcome and fully support this proposal.

Economic Growth and Regeneration – 19 December 2022

Comments on the “Economic Benefits: weighting in the planning balance” briefing note

This note follows our earlier response on the application and relates solely to the briefing note “Economic Benefits: weighting in the planning balance” submitted by the applicant on December 13th 2022.

In our response of October 2022, the Economic Growth and Regeneration Team strongly articulated our support for the proposal, based on its fit with local economic strategy, the significant investment and employment benefits and the proposed approach to local skills development and support for new businesses. Our views remain unchanged and we continue to fully support the proposal.

As the economic benefits briefing note recently submitted clearly explains, since the proposal was submitted there has been a marked deterioration within the national economy. Even since the briefing note itself was written, there has been another increase in interest rates, likely to have a further detrimental effect on living standards and the cost of living crisis. The latest claimant count figures also show an increase in those claiming out of work benefits.

At the local level, the claimant count rate in Buckinghamshire remains lower than the national average (at 2.7% in November 2022, compared to 3.7% for England). However, between October and November 2022, there was a slight increase in the numbers claiming and this remains above pre-pandemic levels. Furthermore, when looking at the parliamentary constituency level, the claimant count in Wycombe, at 4%, is above the national average (*Buckinghamshire’s Claimant Count and Alternative Claimant Count, December 2022, Buckinghamshire Skills Hub, report*)

Similarly, the Quarter 2 Buckinghamshire Business Barometer survey (*Buckinghamshire LEP and BBF, October 2022, report*) found that 54% of responding businesses felt trading conditions were ‘worse than normal’, with a fall in sales and orders and significant increases in operating costs. 77% of responding businesses already have, or intend to increase, their prices, with fewer planning to invest in equipment and machinery and 10% reporting plans to reduce their headcount.

Given recent data and trends, the importance of schemes that create sustainable and well-paid employment opportunities is only heightened. The Creative Industries sector has been identified as one that can help drive recovery and growth, and opportunities for local residents and businesses to take advantage of this through skills development, employment, procurement and business support, need to be encouraged and maximised.

Summary and Recommendations

To summarise, the Economic Growth and Regeneration Team wish to reiterate our support for the proposed development. We have seen over the last few months significant challenges within the UK economy and whilst the economic situation may be comparatively better in Buckinghamshire than in some other areas, now is not the time for complacency. We need to ensure that our residents have chances to develop their skills and to secure good quality, well-paid employment. And we need to ensure our businesses have opportunities to start and grow.

Whilst the Economic Growth and Regeneration Team would not wish to comment on the weighting to be applied to the economic benefits when considering the proposal, we would emphasise the extent and importance of such benefits, at both the local and national level. With the national economy as it is, and with pessimistic economic forecasts from organisations including the Office for Budgetary Responsibility, the importance of investment and growth within a priority economic sector should not be underestimated.

Environment Agency – 30 September 2022

Thank you for consulting us on this application and I apologise for the delay in responding. We have now reviewed the information submitted and have no objection to the proposal if the following conditions are attached to the grant of any planning permission. Without these conditions we would object due to the risk to the environment.

Condition 1

No development shall take place until a scheme for the provision and management of an 8 metre wide buffer zone alongside the Alderbourne watercourse has been submitted to, and approved in writing by, the local planning authority. Thereafter, the development shall be carried out in accordance with the approved scheme. Any subsequent variations shall be agreed in writing by the local planning authority, in which case the development shall be carried out in accordance with the amended scheme. The buffer zone scheme shall be free from built development including lighting, and formal landscaping. The scheme shall include:

- plans showing the extent and layout of the buffer zone
- details of any proposed planting scheme/s (for example, native species suited to the conditions on site)
- details, including cross sections and designs of the wetland features to be constructed

- details demonstrating how the buffer zone and features within will be protected during development and managed over the longer term including adequate financial provision and named body responsible for management plus production of detailed management plan.
- details of any proposed footpaths, fencing, lighting, etc. Of particular importance is the proximity of the footpaths to the water course and the material used to construct them. The footpaths should be set back from the water course by 8m wherever possible and surfaced in a permeable material such as gravel. There should be no artificial lighting within 8m of the Alderbourne to maintain a dark river corridor.
- details and designs of the proposed foot bridge. The footbridge should be clear span design for minimal impact of the channel profile.

Reasons

Land alongside watercourses is particularly valuable for wildlife and it is essential this is protected. Construction or excavation works within buffer zones can impact on protected species and habitats.

This approach is supported by paragraphs 174 and 179 of the National Planning Policy Framework (NPPF) which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused.

This condition is also supported by legislation set out in the Natural Environment and Rural Communities Act 2006 and Article 10 of the Habitats Directive which stresses the importance of natural networks of linked corridors to allow movement of species between suitable habitats, and promote the expansion of biodiversity.

The South Bucks Local Development Framework Core Strategy states that Rivers and waterways are crucial to the enhancement of local biodiversity as they provide natural corridors for biodiversity movement, and are an integral part of the Green Infrastructure assets of the District. It also states that rivers and waterways must be enhanced and restored in general, particularly when development can provide opportunities to renaturalise river corridors.

Networks of undeveloped buffer zones may help wildlife adapt to climate change and will help restore watercourses to a more natural state as required by the Thames river basin management plan.

Condition 2 - landscape management plan

No development shall take place until a landscape and ecological management plan, including long-term design objectives, management responsibilities and maintenance schedules for all landscaped areas (except privately owned domestic gardens), has been submitted to, and approved in writing by, the local planning authority. The landscape and ecological management plan shall be carried out as approved and any subsequent variations

shall be agreed in writing by the local planning authority. The scheme shall include the following elements

- details of any new habitat to be created on-site. In particular, detailed designs of any wetland features or ponds that will be created including cross sections.
- details of treatment of site boundaries and/or buffers around water bodies
- Details of infrastructure such as footpaths, lighting, carparking etc.
- A detailed planting scheme
- details of management responsibilities over the longer term including adequate financial provision and named body responsible for management.
- Details of maintenance regimes

Reasons

To ensure the protection of wildlife and supporting habitat. Also, to secure opportunities for enhancing the site's nature conservation value in line with national planning policy and adopted policy 'Core Policy 9: Natural Environment' of the South Bucks Local Development Framework Core Strategy, Development Plan Document.

A management plan will ensure that a mosaic of habitat types suited to the location are created and ensure that the quality of the habitat created does not decline in the future due to a lack of effective management.

This approach is supported by paragraphs 174 and 179 of the National Planning Policy Framework (NPPF) which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused.

Condition 3 - Legally protected species

No development shall take place until a plan detailing the protection of Great Crested Newts and mitigation of damage to their associated habitat has been submitted to the local planning authority. The plan must consider the whole duration of the development, from the construction phase through to development completion. Any change to operational responsibilities, including management, shall be submitted to and approved in writing by the local planning authority. The Great Crested Newt protection plan shall be carried out in accordance with a timetable for implementation as approved.

Reasons

To protect the Great Crested Newt and its habitat within the development site, and to avoid damaging the site's nature conservation value.

This approach is supported by paragraphs 174 and 179 of the National Planning Policy Framework (NPPF) which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or

as a last resort compensated for, planning permission should be refused. Without this condition we would object to the proposal because it cannot be guaranteed that the development will not result in significant harm to Great Crested Newts and their habitat.

Advice on condition 3

The Great Crested Newt is a protected species under the Wildlife & Countryside Act 1981 (as Amended) and The Conservation of Habitats and Species Regulations 2017 (Regs.) (The Conservation of Habitats and Species Regulations 2017 transposes into UK law the EU Habitats Directive Council Directive 92/43/EEC.) The submitted report (Great Crested Newt Survey Baseline (Interim) 2022) suggests that Great Crested Newts are active in the vicinity of the proposed Alderbourne Farm development. The applicant should employ a suitably qualified ecologist to work with them to develop Reasonable Avoidance Measures for the proposed work at Alderbourne Farm. 4 Examples could include (but should not be limited to):

- Ensuring that any vegetation clearance/removal of potential refugia is carried out during the least sensitive months and in a sensitive manner to avoid impact on GCN.
- Commitment to employ a suitably qualified ecologist to deliver 'tool box talks' on Great Crested Newts to operators onsite prior to any works commencing.
- Employing an Ecological Clerk of Works to be present when vegetation clearance, or the clearance of potential refugia is carried out or when any earth works are being undertaken.
- Addition of hibernacula material if existing material must be lost
- Draining down any standing water during the winter months outside the GCN breeding season. If a pump must be used, use at low speed and cover the intake pipe with fine mesh.

We would also like to see the eDNA GCN survey results for ponds 5 and 9 which couldn't be undertaken in May 2022.

Condition 4 – Foundation works risk assessment

Prior to development a foundation works risk assessment will be agreed with the written consent of the local planning authority. The development shall be carried out in accordance with the approved details.

Reason

The site is located on top of a landfill protected with a geological barrier. This barrier must be protected to ensure there is no harm to groundwater resources in line with paragraph 183 of the National Planning Policy Framework

Condition 5 – no infiltration

No drainage systems for the infiltration of surface water to the ground are permitted on areas above landfill. The development shall be carried out in accordance with the approved details.

Reasons

To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants. This is in line with paragraph 170 of the National Planning Policy Framework.

Advice on condition 5

The proposed SuDS and swales to the perimeter of the Pinewood South development must be impermeable, lined and sealed. Any collected infiltration must be discharged off site.

Regulatory waste advice for applicant

We have the following advice for the applicant in regards to the regulated Landfill on site:

1. Highways Plans show northern entrance to Pinewood South directly on top of Monitoring boreholes GWM01 and GWM10 and the southern access would also destroy GWM07. All these locations are critical to the monitoring and assessment of the risks posed by these landfills. We would encourage these locations to be reconsidered and moved by a couple of metres to preserve these installations. If they are not preserved, they would need to be relocated in line with the requirements of the environmental permit before any work could proceed in establishing new access points, potentially delaying the development. Once replaced, all impacted boreholes must be fully decommissioned to ensure they do not leave pathways for contamination to enter the groundwater. This change to monitoring points may also delay any surrender of the landfill permits as we would no longer have consistent data at fixed locations to demonstrate stable conditions and that the environment has not been impacted.
2. The proposal fails to recognise that although the active operations in the landfill have ceased, this activity (and waste) remains present at the site and there is ongoing processes, reactions, maintenance and monitoring required for this regulated landfill. This can be managed in a way that is compatible with the proposed development, if the development recognises the continuing presence of the waste on the site and incorporates this and its infrastructure into the proposed design.

As the site develops, the exact location of structures is a concern and buildings should be sighted to avoid the geological barriers and landfill monitoring boreholes. This has not been considered in the design and access statement or as part of the landscape and Ecological Design or within PP4. Some proposals for the layout may not be practical given the limitation of the current below ground uses.

3. Drainage systems and services must be designed and located to minimise penetrating the geological barrier.

4. It is unclear what excavation of controlled waste will be required. We remind the applicant that any excavated waste from within the landfill remains a controlled waste even if the applicant has a use for it. It must either be recovered under the correct authorisation (Environmental Permit) or disposed at an appropriate facility. Proposals to create bunds and raised platforms using imported or excavated inert waste soils would not be permitted as this would contravene the existing Environmental Permit held at the site.

Informative- Requirement for an environmental permit

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

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

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

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

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

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

Asset liability

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

Riparian responsibilities

As Alderbourne runs within the red line boundary, it is likely that you own a stretch of watercourse. This means you have riparian responsibilities. Responsibilities include (but are not limited to) the maintenance of the river at this location including the riverbank. Further information on this can be found here: <https://www.gov.uk/guidance/owning-a-watercourse>

Water Resources

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

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

We recommend that all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption. We also recommend you contact your local planning authority for more information.

Final comments

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

Environment Agency – 23 November 2022

Following the information submitted to allay the concerns of your response of your Newt officer's objection we are now in a position to remove the need for our third condition which requested a plan detailing the protection of Great Crested Newts.

We still require the first 2 conditions we requested.

Environment Agency – 23 December 2022

Thank you for consulting us on the amended plans. We have reviewed the information submitted and concluded this does not change our earlier response and we continue to request the following four conditions.

Condition 1

No development shall take place until a scheme for the provision and management of an 8 metre wide buffer zone alongside the Alderbourne watercourse has been submitted to, and approved in writing by, the local planning authority. Thereafter, the development shall be

carried out in accordance with the approved scheme. Any subsequent variations shall be agreed in writing by the local planning authority, in which case the development shall be carried out in accordance with the amended scheme. The buffer zone scheme shall be free from built development including lighting, and formal landscaping. The scheme shall include:

- plans showing the extent and layout of the buffer zone
- details of any proposed planting scheme/s (for example, native species suited to the conditions on site)
- details, including cross sections and designs of the wetland features to be constructed
- details demonstrating how the buffer zone and features within will be protected during development and managed over the longer term including adequate financial provision and named body responsible for management plus production of detailed management plan.
- details of any proposed footpaths, fencing, lighting, etc. Of particular importance is the proximity of the footpaths to the water course and the material used to construct them. The footpaths should be set back from the water course by 8m wherever possible and surfaced in a permeable material such as gravel. There should be no artificial lighting within 8m of the Alderbourne to maintain a dark river corridor.
- details and designs of the proposed foot bridge. The footbridge should be clear span design for minimal impact of the channel profile.

Reasons

Land alongside watercourses is particularly valuable for wildlife and it is essential this is protected. Construction or excavation works within buffer zones can impact on protected species and habitats.

This approach is supported by paragraphs 174 and 179 of the National Planning Policy Framework (NPPF) which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused.

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The South Bucks Local Development Framework Core Strategy states that Rivers and waterways are crucial to the enhancement of local biodiversity as they provide natural corridors for biodiversity movement, and are an integral part of the Green Infrastructure assets of the District. It also states that rivers and waterways must be enhanced and restored in general, particularly when development can provide opportunities to renaturalise river corridors.

Networks of undeveloped buffer zones may help wildlife adapt to climate change and will help restore watercourses to a more natural state as required by the Thames river basin management plan.

Condition 2 - landscape management plan

No development shall take place until a landscape and ecological management plan, including long-term design objectives, management responsibilities and maintenance schedules for all landscaped areas (except privately owned domestic gardens), has been submitted to, and approved in writing by, the local planning authority. The landscape and ecological management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the local planning authority. The scheme shall include the following elements

- details of any new habitat to be created on-site. In particular, detailed designs of any wetland features or ponds that will be created including cross sections.
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- details of management responsibilities over the longer term including adequate financial provision and named body responsible for management.
- Details of maintenance regimes

Reasons

To ensure the protection of wildlife and supporting habitat. Also, to secure opportunities for enhancing the site's nature conservation value in line with national planning policy and adopted policy 'Core Policy 9: Natural Environment' of the South Bucks Local Development Framework Core Strategy ,Development Plan Document.

A management plan will ensure that a mosaic of habitat types suited to the location are created and ensure that the quality of the habitat created does not decline in the future due to a lack of effective management.

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landscape and Ecological Design or within PP4. Some proposals for the layout may not be practical given the limitation of the current below ground uses.

3. 3 Drainage systems and services must be designed and located to minimise penetrating the geological barrier.
4. It is unclear what excavation of controlled waste will be required. We remind the applicant that any excavated waste from within the landfill remains a controlled waste even if the applicant has a use for it. It must either be recovered under the correct authorisation (Environmental Permit) or disposed at an appropriate facility. Proposals to create bunds and raised platforms using imported or excavated inert waste soils would not be permitted as this would contravene the existing Environmental Permit held at the site.

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Water Resources

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

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

We recommend that all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption. We also recommend you contact your local planning authority for more information.

Final comments

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

Environment Health – 5 September 2022

I have reviewed the relevant chapters of the Environmental Statement. Ground conditions and contamination is one of the environmental technical topics that have been scoped out.

Part A – Alderbourne Farm

Historical mapping shows that Alderbourne Farm was present in the 1920s, the rest of the proposed development site appears to have been fields, likely agricultural in use, inferred by field boundaries depicted on the map for this period, there is a wooded area labelled Brown's Wood in the east of the site, not a great deal of change is shown on the subsequent maps.

There is an area in the south west of the site that has been subject to quarrying .

There is an area of historic landfill on the eastern boundary (hld_ref EAHLD12504, site_name Field end farm, site_name Seven Hills Road, Iver, wrc_ref 0400/0092, site_ref WDA/234, 1094/13, lic_hold Mayling Skip Hire, lic_issue 02/06/1986, lic_surren 19/02/1993, firstinput 30/06/1986, lastinput 30/06/1989, inert).

There is another area of historic landfill within the Pinewood site (Sauls Farm).

The section in Volume 2 of the ES that relates to Alderbourne Farm concludes as follows:

“The geoenvironmental preliminary risk assessment undertaken for the Alderbourne Farm indicates a low risk as the site is generally greenfield, but a moderate risk associated with infilled land and potential for buried waste/cars, and the migration of potential contaminants from off-site particularly associated with the former landfill to the south east. The results of the assessment indicate that, subject to the findings of the proposed investigations, there is low likelihood remediation associated with on site sources will be required due to the greenfield nature of the site, however, due to its close proximity to a former landfill and the potential for buried cars/parts, some development phase remediation such as removal of buried cars, provision of capping layers and implementation of a watching brief and discovery strategy may be required. A technical note detailing how unexpected contamination, if encountered, will be dealt with will be issued under separate cover”.

Part B - Pinewood South

The historical maps indicate that the site may have had an agricultural use, inferred by the presence of field boundaries on the map for the 1869-1888 epoch, Park Lodge, a rectory and Grace Villa are shown within the site boundary, an old gravel pit is shown adjacent to the site during the 1898-1899 epoch, the site is shown as being divided by various lines on the map for the 1955-1974 epoch, further residential properties are shown on the periphery, a council depot and the five points roundabout are also shown.

There is an area of historic landfill in the north of the site (hld_ref EAHLD35923, site_name Park Lodge Farm, site_add Pinewood Road, Iver Heath, lic_hold Brett Aggregates Ltd, lic_issue 31/07/2000, firstinput 24/04/2002, no further details held).

There is an area of authorised landfill in the south of the site, it is understood that the site accepts inert waste.

The section in Volume 2 of the ES that relates to Pinewood South concludes as follows:

“From the preliminary intrusive investigation undertaken, elevated concentrations of contaminants have not been recorded above the generic assessment criteria for a commercial end use. Low levels of asbestos (below the hazardous waste threshold of 0.1%) were detected in three samples between 1.5m and 3.6m bgl. The geoenvironmental 14 preliminary risk assessment undertaken for the site indicates a general low to moderate risk at Pinewood South. 91. Whilst the investigations and assessments may identify that some remediation may be required to support the development of Pinewood South, based on the site history it is anticipated that this is likely to comprise of typical remediation

requirements for the redevelopment of brownfield sites such as ground gas protection measures and the installation of capping layers”.

The geoenvironmental preliminary risk assessment and the preliminary intrusive investigation do not appear to have been submitted.

Based on this, the following contaminated land condition is recommended on this and **any subsequent applications** for the site.

The application requires the following condition(s):

1. Prior to the commencement of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:

i) A preliminary risk assessment which has identified:

- all previous uses
- potential contaminants associated with those uses
- a conceptual model of the site indicating sources, pathways and receptors
- potentially unacceptable risks arising from contamination at the site.

ii) A site investigation, based on (i) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site. This should include an assessment of the potential risks to: human health, property (existing or proposed) including buildings, crops, pests, woodland and service lines and pipes, adjoining land, ground waters and surface waters, ecological systems, archaeological sites and ancient monuments.

iii) The site investigation results and the detailed risk assessment (ii) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

iv) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in (iii) are complete and identifying any requirements for longer term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these components require the express consent of the local planning authority. The scheme shall be implemented as approved.

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

2. Following completion of measures identified in the approved remediation scheme and prior to the first use or occupation of the development, a verification report that

demonstrates the effectiveness of the remediation carried out must be produced together with any necessary monitoring and maintenance programme and copies of any waste transfer notes relating to exported and imported soils shall be submitted to the Local Planning Authority for approval. The approved monitoring and maintenance programme shall be implemented.

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

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

3. Reporting of Unexpected Contamination: In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance with the requirements of condition 1, and where remediation is necessary a remediation scheme must be prepared in accordance with the requirements of condition 1, which is subject to the approval in writing of the Local Planning Authority. Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority in accordance with condition 1.

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

Forestry Commission – 1 September 2022

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

- Details of Government Policy relating to ancient woodland
- Information on the importance and designation of ancient woodland

Ancient woodlands are irreplaceable. They have great value because they have a long history of woodland cover. It is Government policy to refuse development that will result in the loss or deterioration of irreplaceable habitats including ancient woodland, unless "there

are wholly exceptional reasons¹ and a suitable compensation strategy exists” (National Planning Policy Framework paragraph 180).

We also particularly refer you to further technical information set out in Natural England and Forestry Commission’s Standing Advice on Ancient Woodland – plus supporting Assessment Guide and Case Decisions.

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

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

- damaging or destroying all or part of them (including their soils, ground flora or fungi)
- damaging roots and understory (all the vegetation under the taller trees)
- damaging or compacting soil around the tree roots
- polluting the ground around them
- changing the water table or drainage of woodland or individual trees
- damaging archaeological features or heritage assets
- changing the woodland ecosystem by removing the woodland edge or thinning trees
- causing greater wind damage and soil loss

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

Planning Practice Guidance emphasises: *‘Their existing condition is not something that ought to affect the local planning authority’s consideration of such proposals (and it should be borne in mind that woodland condition can usually be improved with good management)’*.

If this application is adjacent to or impacting the Public Forest Estate (PFE):

Please note that the application has been made in relation to land near the Public Forest Estate and Forestry England, who manage the PFE, is a party to the application. They therefore should also be consulted separately to the Forestry Commission.

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

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

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

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

Forestry England – 8 September 2022

Forestry England do not manage any land near to this application, was the application intended for the Forestry Commission (the forestry regulator), who have a statutory responsibility to comment on planning applications involving ancient woodland? If so, please resend the consultation to nationalenquiries@forestrycommission.gov.uk

Heritage (Historic Buildings) – 9 September 2022

Heritage Assets
Alderbourne Farm (Site A) <ul style="list-style-type: none">– Non designated heritage assets; a number of the existing buildings on the site need to be considered under the current Historic England criteria
Land South of Pinewood Studios (site B) <ul style="list-style-type: none">– Listed Buildings (LB), which are designated heritage assets; adjacent the site is Heatherden Hall and Little Coppice, both Grade II Listed. Nearby is the Church of St Margaret which is also Grade II Listed– Registered Park and Garden (RPG), which is a designated heritage asset; near the site is Langley Park a GII RPG

Relevant Planning History
PL/20/3280/OA - Outline planning permission with all matters reserved (except for principal points of access) for the phased development of a screen industries global growth hub of up to 750,000 sq ft (70,000 sq m) comprising: <ul style="list-style-type: none">– A visitor attraction of 350,000 sq ft comprising a series of buildings– 350,000 sq ft of film production buildings (including sound stages, workshops, offices and an external film backlot)– Education and business hub (50,000 sq ft)– Associated parking and servicing - Green Infrastructure (APPROVED)

Comments will be reiterated where applicable

Discussion

The heritage assessment is the impact on the setting of the listed buildings and the registered park and garden. And if considered as such, the impact on the non-designated heritage assets and their setting.

SIGNIFICANCE

- SITE A

Alderbourne Farm (site A) is a collection of typical farm buildings, including agricultural barns of varying forms, scale and materials albeit mostly modern. Along with a small brick cottage and timber dovecote (possible NDHA).

The 1875 OS Maps shows a traditional farmyard arrangement with two linear building forming a yard area (no longer in situ) and forward of this a rectilinear plan form building with small ancillary buildings around, this building is believed to be the existing farm cottage. Later map phasing indicates additional farm buildings have appeared and later removed, which is common due to changes in farming practice.

In the absence of a formally adopted Local List the council's fall back is to assess buildings in line with the Historic England criteria (HEAN7). Regrettably the submitted heritage statement has confirmed it only referred to the Council's online resources. As the site is not within a conservation area and the Council are currently at the early stages of its Local List (therefore not adopted) there are no online resources for NDHA's.

Currently the cottage has boarded windows and therefore many of the features to identify the significance were not possible during the site visit.

- SITE B

The area south of Pinewood Studios (site B) is an area of open landscape containing no built development or heritage assets (HA). However, there are a number of HA's within the vicinity.

- Heatherden Hall (GII)

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

The building is characterised by its French-Classical formality, but described as loose and Italianate composition with formal and polite stuccoed and painted brick with slate roof

concealed behind parapet. The building's interior suites are luxurious and well-preserved including a double height ballroom and swimming pool. The formalised gardens also include various urns, a bridge and niches along with the original entrance lodge off Pinewood Road. These structure likely form part of the curtilage to the principal listed hall and can be considered as part of the grade II listed entity.

In light of the above, the building carries significance through its architectural value, historic value, aesthetic value, social and communal value and through its rarity.

– Little Coppice

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

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

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

In light of the above, the building carries significance through its historic value, aesthetic value, architectural value and rarity.

– St Margaret's Church (GII)

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

– Langley Park (GII) and Associated Listed Buildings (GII)

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

PROPOSAL

Site A, a former farm north of the existing Pinewood Studios is an entirely new scheme, to include a space for an open air filming backlot and supporting buildings to complement the existing studio facilities. The development would include areas of parking and serving, with access from Seven Hills Road.

To the north of this, the remaining area of the site is to become a nature reserve to be used as a recreational function. As a new facility it would deliver a biodiversity gain and ensuring a longer term protection of the existing arrears of the ancient woodland.

Site B, the land south of the existing Pinewood Studios has extant outline permission for a growth hub, to include a visitor attraction, film production buildings, education and business hub along with the required surface level parking and landscaping for up to 750,000 sq ft (70,000 sq m).

The current proposal similarly seeks outline permission of film production buildings (to include sound stages, workshops, offices and ancillary uses), education and business hubs with associated ancillary structures together with backlot, multi storey car parks, accesses and green and blue infrastructure, however, the current application seeks to increase this to 1,365,000sqft (126,817sqm).

SITE CONTEXT

Site A is located to the north of the existing Pinewood Studios and extends to 35ha (87acres) and currently consists of areas of farmland, agricultural buildings along with the farm cottage and mature woodland. Predominantly used as agricultural grassland until the farming operations ceased in 2019.

To the north the site is bounded by Orcahrd Cottage, a large residential property with associated grounds containing a number of mature trees which abuts Hawks Wood to the north east. To the east the site aligns with the M25 and M40 intersection slip road and planted embankment. The south is bounded by Sevenhills Road, currently a single carriageway B road although with existing consent to re-align and upgrade. Along the westerly boundary is Alderbourne Lane with a native hedge of circa 2.5 metres in height with a number of mature and semi-mature oak trees lining the road.

The Alderbourne River bisects the site in an east-west direction, forming a natural valley. The site slopes down towards the Alderbourne River to the north, with a series of farm yard areas terracing the valley and a fall of approximately 30m across the 0.4km. North of the river, the site slopes upwards with a change of 14m across the 0.3km.

Development site B extends to 32ha (77acres) and currently consists of open fields and is bounded to the north by the existing Pinewood Studios, to the west by Black Park Country Park, to the south by the A412 Uxbridge road and to the east by Pinewood road.

The site has been the subject of quarrying and subsequent land fill but now largely consists of verdant green open space falling within the Colne Valley Regional Park. The

site lies within the Green Belt and is therefore underpinned by the prevailing objective of preventing urban sprawl and by keeping land permanently open and undeveloped.

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

HERITAGE IMPACT

Site A will retain the existing access from Seven Hills Road, albeit with a widened entrance. In heritage terms there are no objection to this point of access.

Whilst it is acknowledged the current masterplan is indicative only at this stage (except for principal points of access) the scheme includes the demolition of all existing building within the site. As discussed above the majority of these are modern and therefore no objection in heritage terms regarding their loss.

However as also discussed above the farm cottage appears in mid to late 19th century maps, and therefore would require further assessment prior to any decision as to its demolition. In addition, the dovecote appears an interesting feature within the site. It was discussed on site that this could be more easily relocated within the site rather than it be lost in its entirety.

The site B masterplan includes two points of access off the Pinewood Road and a third access off Uxbridge Road. As these are in line with the previously approved scheme, the access arrangement remains acceptable in heritage terms.

Whilst it is acknowledged the masterplan is indicative at this stage only, the current application represents a considerably intensified expanse of additional built development. This will include replacing the surface level parking within the southern section of the site and area towards the north, along Pinewood Road. Parking instead would be provided by multi-storey car parks, two along the Pinewood Road and a third when entering the site from Uxbridge Road. Therefore further assessment is required on the setting of the identified heritage assets;

- Langley Park (GII RPG) and Church of St Margaret (GII LB)

In response to the previously approved application the heritage response concluded due to the degree of separation and distance between site B and these heritage assets, they would not be affected by the proposed development.

Whilst the revised scheme does intensify the extent of built development the maximum height levels of the indicative buildings has not increased. Thereby, not impacting shared or long views which may include the development or HA together. Therefore, the opinion remains there would be no impact to these HA's from the revised scheme.

- Little Coppice

The heritage response for the previous scheme raised concerns of the impact of the development on the setting of this listed building. It highlighted that Little Coppice has a

strong visual presence from Pinewood Road and from across the development site from key vantage points along the public right of way within Black Park. Whilst the latter point was disputed by the agents in their own additional comments (Response to consultation submission by Buckinghamshire Heritage officer, December 2020) it was agreed the viewpoint from Pinewood Road of The Coppice was more significant. The agent's comments regarding the impact from the bunding of the quarry considered irrelevant as these were only ever to be temporary as per the quarry use of the site.

Therefore, to reiterate development such as that proposed in site B, especially the intensification of built development along Pinewood Road would have some impact on the views from, towards, through across and including this listed building. The surrounding landscape and any intentional intervisibility with other historic and natural features, such as Black Park also contributes to the setting of heritage assets. Which in the case of Little Coppice would be negatively impacted by the proposed development in site B.

– Heatherden Hall (GII LB)

The immediate setting of this listed building has been somewhat altered due to the expansion of the studios, particularly to the north. However, an area of formal garden has been retained between the listed building and site B to the south. In the response to the previous application heritage concerns were raised that the existing plant screening did not provide sufficient visual separation. A concern somewhat mitigated by the proposed surface level parking in the north east corner of the site.

However, in the current indicative masterplan this corner would be occupied by a multi-storey car park. Similarly, to Little Coppice this raises concern regarding the impact on the views from, towards, through across and including this listed building. The surrounding landscape and any intentional intervisibility with other historic and natural features, such as Black Park also contributes to the setting of heritage assets.

Summary;

Subject to the current application being approved, further consideration of additional built development along the Pinewood Road would be required to minimise the impact on the setting of these heritage assets. Whilst it is acknowledged the masterplans are indicative at this stage, the extent of additional built development proposed under this outline application would ultimately require more intensive development along the Pinewood Road. For reasons discussed above, this would have a negative impact on the identified heritage assets and therefore would not preserve their architectural and historic interest.

Heritage Policy Assessment

The Planning (Listed Building and Conservation Areas) Act 1990

The proposals due to the extent of built development within site B would not preserve the architectural and historic interest of the listed buildings and therefore does not comply with sections 66 of the Act.

NPPF

The proposal due to the extent of built development within site B would cause less than substantial harm to the significance of the designated heritage asset. Paragraph 202 therefore applies.

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

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

Paragraph 195 which considers the impact on setting and minimising conflict: *‘Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal’.*

Paragraph 200: *‘Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification’.*

Due to the lack of assessment of the farm cottage and dovecote (site A), there is insufficient (heritage) information to determine the application and therefore the submission does not comply with paragraph 194 of the NPPF. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

Conclusion

For the reasons given above it is felt that in heritage terms: That the application does not comply with the relevant heritage policy and therefore unless there are sufficient planning reasons, it should be refused for this reason.

Heritage – 7 November 2022

Summary

The additional heritage assessment for the existing buildings within Alderbourne Farm is welcomed and considered sufficient. It is agreed that the existing buildings are not considered to be non-designated heritage assets (NDHA).

Heritage Assets

Alderbourne Farm (Site A)

- The existing buildings of Alderbourne Farm have been assessed and are not considered to be nondesignated heritage assets.

Land South of Pinewood Studios (site B)

- Listed Buildings (LB), which are designated heritage assets; adjacent the site is Heatherden Hall and Little Coppice, both Grade II Listed. Nearby is the Church of St Margaret which is also Grade II Listed
- Registered Park and Garden (RPG), which is a designated heritage asset; near the site is Langley Park a GII RPG

Relevant Planning History

PL/20/3280/OA - Outline planning permission with all matters reserved (except for principal points of access) for the phased development of a screen industries global growth hub of up to 750,000 sq ft (70,000 sq m) comprising:

- A visitor attraction of 350,000 sq ft comprising a series of buildings - 350,000 sq ft of film production buildings (including sound stages, workshops, offices and an external film backlot)
- Education and business hub (50,000 sq ft)
- Associated parking and servicing
- Green Infrastructure

(APPROVED)

Discussion

The following should be read in conjunction with the initial heritage comments made on the 9th September 2022. These earlier comments requested an assessment be made of the existing buildings within Alderbourne Farm which has now been submitted as '*Heritage Statement: Addendum: Alderbourne Farm - October 2022*'.

Alderbourne Farm (Site A)

- Farmhouse

During the site visit (31st August) the existing farmhouse was screened off with Harris fencing and boarded windows, therefore a thorough assessment was not possible at that time. Although it was noted to be of a similar position and form as a building indicated in the 1875 OS Maps.

The updated Heritage Statement has accessed the relevant local authority archives to find a 1958 sales particulars photograph (figure 3.8) of the Alderbourne Farmhouse which is now believed to have been the building in the earlier maps. It is agreed that the most likely outcome was this farmhouse was demolished or significantly altered to allow for the building seen on site now.

Furthermore, whilst the internal features of a NDHA cannot form part of a planning consideration, in this instance modern construction timbers and materials confirm this as a more recent building.

Therefore, it is agreed the existing farmhouse is not considered a non-designated heritage asset.

- Dovecote/Bird House

Whilst this was not identified on any historical maps, it was noted during the visit to be an interesting structure and further assessment requested. The Heritage Statement has confirmed this is of modern construction and a relatively plain garden building.

It is agreed this is not a non-designated heritage asset.

- Farmstead

As stated in the previous heritage comments the majority of remaining farm buildings are of modern construction. The additional Heritage Statement has identified that some of these buildings have remnants of older fabric and may be in similar positions within the site. Essentially small sections repurposed but significantly altered.

As a whole, whilst the farmstead and its transitional development is of some interest, the buildings which remain are not considered to be non-designated heritage assets.

Land South of Pinewood Studios (side B)

No additional or revised information has been submitted for site B and therefore please refer to initial heritage comments dated 9th September 2022

Heritage Policy Assessment

Please refer to initial heritage comments dated 9th September 2022 however paragraph 194 of the NPPF is no longer relevant as there is no objection on grounds of insufficient information.

However, the proposal remains unchanged at this stage for site B which due to the extent of built development within this area would cause less than substantial harm to the significance of the designated heritage asset. Paragraph 202 therefore still applies.

Conclusion

For the reasons given above it is felt that in heritage terms:

Please refer to initial heritage comments dated 9th September 2022

Historic England – 25 August 2022

Thank you for your letter of 10 August 2022 regarding the above application for planning permission.

Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the application.

We suggest that you seek the views of your specialist conservation and archaeological advisers. You may also find it helpful to refer to our published advice at

<https://historicengland.org.uk/advice/find/>

It is not necessary to consult us on this application again, unless there are material changes to the proposals. However, if you would like advice from us, please contact us to explain your request.

Historic England – 6 September 2022

Thank you for your letter of 25 August 2022 regarding further information on the above application for planning permission.

On the basis of this information, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.

Historic England – 12 January 2023

Thank you for your letter of 23 December 2022 regarding further information on the above application for planning permission. On the basis of this information, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.

Planning – Royal Borough of Windsor and Maidenhead – 9 December 2022

Thank you for your consultation that was received on 10 August 2022.

I write to inform you that the Royal Borough of Windsor and Maidenhead has no objection to the above proposal.

Planning – Royal Borough of Windsor and Maidenhead – 17 January 2023

Thank you for your consultation that was received on 21 December 2022.

I write to inform you that the Royal Borough of Windsor and Maidenhead has no objection to the above proposal.

Buckinghamshire Highway- 10 January 2023

Thank you for your consultation letter with regard to the above planning application. The proposed scheme is an alternative to the Screen Hub UK (SHUK) scheme that was permitted by Buckinghamshire

Council in April 2022. It is on the same footprint albeit covers a larger area that SHUK and includes

Alderbourne farm. The application documents present this as an effective variation of the existing permission. It must however be stressed that this is a new application, and must be assessed and mitigated based on its own impacts and not on any previous permission that exists. The permitted SHUK scheme promoted a modest level of film production space, an education hub, business development space and a dominant feature of that application was a visitor attraction that was presented of being of national importance. The scheme before us is fundamentally different in nature being as it is nearly entirely film production with the business hub and education elements retained as minor elements within the application.

The TA sets out the requirements of the National Planning Policy Framework, in relation to determining applications in Highway Terms.

Paragraph 110 and 111 of the National Planning Policy Framework sets out the following tests when considering the traffic impacts of a planning application; Para 110. In assessing sites that may be allocated for development in plans or specific applications for development, it should be ensured that: a) Appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location. b) Safe and suitable access to the site can be achieved for all users. c) The design of streets, parking areas, other transport elements and the content of associated design standards reflects current national guidance, including the National Design Guide and the National Model Design Code, and d) Any significant impacts from the development from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

Para 111. Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe.

The Highway Authority has tested this application against these criteria and come to its recommendation in the light of these tests. T

he location of the development within Iver is remote from a significant centre of population and not easily accessible via public transport, with limited bus services in the vicinity and the rail/tube stations being beyond an acceptable walking distance. The development location therefore lends itself to the dominant mode of travel being the private car.

The TA sets out in section 1.2 the development background, this summarises the applications known as PSDF (13/00157/OUT) and SHUK (PL/20/3280/OA) and seeks to set out the highway works and s106 agreements within these two applications. It is notable that the PSDF application carried with it an obligation to deliver a traffic signals scheme at Five

Points Roundabout (FPR) which has not yet been delivered. In 2019 an application for an alternative mitigation, Sevenhills Road (SHR) (PL/19/4430/FA) improvement was received and subsequently approved as a variation to the PSDF s106 agreement. On granting of permission Pinewood Studios served notice on the Council that they would implement the FPR scheme to fulfil the obligation of PSDF mitigation. There is currently a planning application with the council for this scheme (PL/21/4074/FA).

The SHR scheme was supported by a Transport Assessment carried out by iTransport, that sought to demonstrate that 30% of the traffic generated by Pinewood Studios was reaching the Strategic Road network at the M40 Junction 1, Denham interchange. It was found that the scheme was an acceptable alternative to FPR to mitigate the impacts of PSDF by reducing the traffic pressure on FPR by the removal of that proportion of traffic and redirecting it away from Pinewood Studios via SHR and onward to the M40.

The SHUK application, (PL/20/3280/OA) used the same assessment criteria and network within its assessment. The visitor attraction would be accessed by persons from all over the country reaching the site from the Strategic Road Network, of which the closest location available is the M40 Junction 1. The nature of a visitor attraction promoted a significant proportion of visitors via coaches throughout the day which limited the impacts of peak hour traffic.

This application is fundamentally different from those previous applications and therefore it is necessary to assess it as such. This is a new application that seeks to develop large scale filming and production facility on the land, which will employ large numbers of people from surrounding residential areas, namely, Slough, Uxbridge and Hillingdon, Gerrards Cross, Beaconsfield and the surrounding small towns and villages within South Buckinghamshire and across London. This is a dispersed resident workforce that will approach the site from all directions. The number of employees at the site is also to be significantly different from that of the visitor attraction, and this will be borne out within the trip generation of the site, that will be significantly different in volumes and pattern from the previous application.

As a result, this application cannot be considered to be similar in transport terms to the SHUK application, rather if it has parallels with previous applications it can only be considered similar with the PSDF application and should be assessed in a similar manner to that application.

The applicant has carried out their transport assessment on a first principles approach over the assessed network and submitted the results of local junction modelling, which was the methodology used with the SHUK application. In review of this technical information the Highway Authority determined that the information provided allowed appropriate assessment of the network and a determination of the impacts.

To have confidence in the results of this methodology the Highway Authority has undertaken further review of additional evidence to determine the baseline traffic for the highway network. Future developments by this applicant should expect to use the Iver Strategic Model as the most comprehensive method of assessment, preventing the need for manual assessment of junctions outside the assessed area.

The application has used survey data from March 2022, which was of concern to the Highway Authority given the closeness to the ending of COVID-19 restrictions. In order to address the concerns further information and evidence was required to show that the data provided was representative of true highway conditions and supported across both the local and strategic networks. The Highway Authority has been able to corroborate this information with data gathered by the Council. Sensitivity testing has also been undertaken and supplied to the Highway Authority testing the network under conditions of higher demand and background traffic levels for greater certainty of the networks ability to accommodate the development traffic.

Trip Rates

The trip rates supplied within this application are based on employee turnstile survey data from March 2022, the results of this survey show a significantly lower trip rate than that used and accepted within the SHUK application. These new trip rates are also lower than had been used within the PSDF application. These differences in the trip rates are explained by the development of PSDF which meant that a similar number of individuals would be working across the larger area leading to less overcrowding. The lower trip rates than SHUK have been evidenced as a result of proportions of the employee base now being able to work remotely for some of the week. And the provision of comparative rates to other film production sites show that these lower rates are not dissimilar to other sites. The new trip rates have been fully explained by the applicant and are considered appropriate to apply to the new development.

The accepted base trip rates (the assessment made prior to any sensitivity testing) are as follows;

Table 10.11: Proposed Scheme Traffic Generation (AM Peaks)

	AM Peak Hour 1 (0700 – 0800)			AM Peak Hour 2 (0715 – 0815)		
	Arr	Dep	Two-Way	Arr	Dep	Two-Way
Education hub	6	0	6	20	1	21
Business growth hub	13	2	15	26	2	28
Pinewood South Production Space	619	57	676	486	71	557
Alderbourne Farm Production Space	16	1	17	12	2	14
Total	654	60	714	544	76	620

Source: Tables 10.1, 10.3, 10.7 and 10.9.

Table 10.12: Proposed Scheme Traffic Generation (PM Peaks)

	PM Peak Hour 1 (1715 – 1815)			PM Peak Hour 2 (1730 – 1830)		
	Arr	Dep	Two-Way	Arr	Dep	Two-Way
Education hub	11	16	27	13	14	27
Business growth hub	4	55	59	3	43	46
Pinewood South Production Space	56	481	537	50	498	548
Alderbourne Farm Production Space	1	12	13	1	13	14
Total	72	564	636	67	568	635

Source: Tables 10.1, 10.3, 10.7 and 10.9.

Sensitivity testing has been carried out using these rates as a basis and then uplifting them to ensure that further assessment at a greater level of robustness has been considered.

The existing Sustainability of the site

As previously mentioned the site is not easily accessible via sustainable modes, and has therefore secured travel planning measures in previous applications, including shuttle buses and requirements for cycleway infrastructure. The lack of sustainable travel options was also acknowledged within the Planning Inspectorates report and the Secretary of States findings regarding the 2013 application for the PSDF expansion.

The cycle and pedestrian options within Iver Parish are not complete and do not provide year-round or all weathers suitable provision for use as commuting routes. The current footway/cycleway on Pinewood Road is present but ceases at FPR, it has been the expectation to use developer funding to connect this with National Cycle Route (NCR) 61.

Delivery of pedestrian and cycle improvements are being actively pursued by the Transport Strategy team within the Council at the present time. NCR 61 runs east west through the parish of Iver, 1.6km south of the site and provides connectivity between Slough and

Uxbridge. However current guidance states that cycling may provide a viable alternative for short journeys of up to 5km. This distance would reach the centre of Uxbridge or the northern edge of Slough, via the A4007 and the A412 respectively. The A412 Uxbridge Road is a high-speed dual carriageway, which is unsuitable for cycling. NCR61 would represent a significant southerly diversion from the centre of Uxbridge to reach the site and uses unlit routes including the bridge over the M25 at Palmers Moor Lane and Love Green Lane

The A4007 Slough Road has no cycle provision on it and there is no current cycle provision to either Iver or Langley stations. Whilst there have been improvements to the provision in the area as a result of PSDF and other measures that were secured under SHUK, these do not yet represent a connected comprehensive network of sustainable travel options.

The Public Rights of Way (PROW) network in the Iver area provides connections between parts of the parish. However, these are principally recreational routes at the present time. The PROW network is important and should be improved and supported, though without significant improvements to make the surfaces suitable for all weather use by pedestrians and cyclists it does not constitute a network that should be considered part of the provision of the access the development.

Considering the Public Transport provision in the area, there is very limited access to the site by commercial bus route 3. The nearest stop is found east of FPR 500m from the closest corner of the site, well in excess of the current maximum recommended distance of 250m. The true distance to this stop is greater than this, as the development itself is 800m in length. The services do not provide a comprehensive timetable. To mitigate this previously Pinewood have provided private shuttle bus connections to local rail and underground stations. The shuttle bus service provides private connection to rail stations radially notably with the exception of Iver and Langley station.

Introduction to local highway network

The local highway network is known to be significantly congested, with particular issues known to be present on the A412 Church Road, FPR and the junctions between Thornbridge Road and Bangors Road North. There are also significant issues on the double mini roundabout at Bangors Road North/Bangors Road South/Slough Road. Sevenhills Road currently remains a link of poor quality with a section that is a single track road without passing places at its western end. FPR has also known to experience congestion issues hence the requirement for signalisation. The junction of SHR with the A412 Denham Road is known to perform poorly, with long delays to exit and turn right into Sevenhills Road representing a safety concern when these movements are performed during peak traffic conditions, and the SHR planning application demonstrated this.

The congestion and characteristics of the local highway network causes the local highway network to be a threatening and unwelcoming environment for walking and cycling, as identified within the Iver Neighbourhood Plan, which seeks to address this through ambitions to provide extensive improvements to the sustainable infrastructure.

It is therefore necessary that this application makes its own independent proposals for mitigation based on the trip generation and activity that this application will introduce.

Further comments shall be made regarding this matter later in this response when considering the Travel Plan and the proposals presented, and appropriate obligations within the s106 table at the end of this response.

Road Safety Assessment

The road safety analysis shows that the highway network does not have any pattern of collisions due to highway design. The applicants do acknowledge local concern at the junction of Black Park Road with the A412, and the way in which the Highway Authority has implemented a safety improvement addressing turning movements (removing right turns out of Black Park Road and modifying the ability to make U turns) at that junction in 2019. This reflects the improvement that has been seen within the recorded accident statistics. It is noted that the applicants propose a contribution of £25,000 towards safety improvements at this junction. This contribution is accepted as the development will see an increase in traffic in the area, and the presence of a new left in left out access point on the A412 close to this junction. The applicants haven't given a specific proposal that the Highway Authority would seek to progress at this time. Road Safety colleagues are supportive of the contribution, that should be secured for mitigation that can be implemented on the A412 in support of the existing safety scheme.

Local Highway Network Assessment

As has been previously noted the highway network that has been assessed within this application is the same as that which has been used for the SHR and SHUK applications. It has been previously outlined within this response as to why those assessments have been accepted.

The network assessed has been identified using Automatic Number Plate Recognition (ANPR) survey data which identifies ~30% of Pinewoods existing traffic travels (tables 7.1 and 7.2 of the SHR application TA) to reach the M40 and onward to the M25 and wider network. With the introduction of the SHR scheme that traffic would be expected to reallocate away from the rest of the network.

The remaining traffic disperses over the network to the south and east of FPR and out of the Buckinghamshire network into the neighbouring areas. The Highway Authority initially had concerns with the cordon area used for the assessment and that it was not large enough. In response to this concern further work has been carried out to identify the potential volumes of traffic that could reach the wider network through the sensitivity testing, and the Highway Authority is content that the junctions beyond the assessed network would be impacted by low enough numbers of vehicles not to be a change in volumes that would require assessment or mitigation.

The peak hours used within the assessment are acceptable, and the premise of the overlapping assessment hours is continued from previous applications. This ensures that both the development peak hour traffic and the network peak hours are assessed fully.

Operational Assessments of junctions.

The baseline presented a less congested network than that presented for the SHUK application, with FPR, Pinewood Road/Pinewood Green and the SHR/A412 Denham Road

junction now being presented as currently operating within theoretical capacity due to the use of a new set survey data. The Highway Authority was concerned by the degree to which the results differed from previous assessment and needed to be satisfied that the surveys gave a reliable representation of the network. To address these concerns two sets of sensitivity tests were carried out, and all other available local and national traffic data sets were scrutinised. The baseline models have been subject to robust assessment and the results of these describing the current performance of the network are now accepted by the Highway Authority.

A summary of the current junction performance is set out overleaf, as found in table 4.10 of the TA;

Junction	2022 Operation
Pinewood Road / Pinewood East Access	Below Operational Capacity
Pinewood Road / Pinewood West Access	Below Maximum Capacity
Pinewood Road / Sevenhills Road	Below Operational Capacity
A412 Denham Road / Sevenhills Road	Below Maximum Capacity
Pinewood Road / Pinewood Green	Below Operational Capacity
Five Points Roundabout	Below Maximum Capacity
A412 Church Road / Thornbridge Road	At Capacity
A412 Church Road / Bangors Road North / A412 Denham Road	Below Maximum Capacity
A412 Uxbridge Road / Black Park Road	Below Operational Capacity

The table uses Ratio of Flow to Capacity (RFC) values to determine the thresholds for the colour coding, below 0.85 for below operational capacity, between 0.85 and 1 for below maximum capacity and greater than or equal to 1 for at theoretical capacity.

Proposed Scheme and access

The proposed scheme is for two key elements, the development of the land south of Pinewood Studios as production studios, education hub and a business growth hub (Centre Stage), and to the north of the existing studios: backlots; workshops; and a nature reserve at Alderbourne Farm. This proposal turns Pinewood studios into a campus of four sites, served by Pinewood Road and the western end of Sevenhills Road. It was a concern to the Highway Authority that this section of the public highway stands to become a defacto estate road serving internal movements between the different elements of the Pinewood estate. In order to demonstrate that the proposals will not prevent Pinewood Road remaining

available for normal use by the traveling public, including residents on Pinewood Road and Pinewood Green an internal trips assessment has been supplied showing that the numbers of expected internal trips using Pinewood Road are not greater than 10 in any one peak hour and this is not a concern to the Highway Authority.

The Pinewood South element of the development is proposed to be accessed by two access points on Pinewood Road and one left in and left out access point on the A412 Uxbridge Road on the approach to Five Points Roundabout. These access points are as designed and approved by the previous permission for Screen Hub UK and are therefore established as being safe and suitable for accessing the site.

Mindful of the above comment the development proposals do not present any description of additional security gateway proposals, such as are found at Pinewood West, or Pinewood East. Rather the accesses are described as being as proposed for the SHUK application, priority junctions as were proposed for public access car parks which would allow free dispersal within the car parks. The Highway Authority will therefore require by condition that details of security at the access points are addressed through reserved matters applications. It should be noted that it shall be a requirement of these applications to show how any security measures will be positioned in such a way as to ensure that there will be no standing traffic backing onto the public highway. This shall be by necessity a condition that must be satisfied prior to commencement of the site.

Access to Alderbourne Farm is proposed to be achieved through the creation of a new priority junction on Sevenhills Road, within the new section to be created as part of that scheme. The principal of this access is accepted, however it is noted as above that as a matter of reserved matters it will be required that details of the separation of the public access and the secure studio activities are to be managed and arranged.

It is proposed that layby parking will be maintained on the A412 Uxbridge Road through re-provision of parking spaces within other laybys. This is accepted and required by the Highway Authority to ensure that there is no loss in provision of these well used laybys and therefore no worsening of the highway safety with additional parking taking place on the dual carriageway.

Pedestrian and cycle access to the site is proposed to be provided to the studios space through the existing footway on Pinewood Road and the provision of footways into the site at the access locations. Alderbourne Farm will have a pedestrian access along the existing farm access for the public access areas.

As all other matters are reserved other than access this is not an opportunity to comment on matters of the internal road layout or parking provision, however at the reserved matters stage it will be necessary for the applicants to supply a comprehensive parking accumulation exercise in order to demonstrate the parking provision is appropriate within the multi-story car parks.

Scheme impacts

The Transport Assessment presented assessment of impacts in 2026 and 2036, as a year of opening and the end of the local plan period in line with normal practise. Comparative assessments have been carried out between a future year of no development on the site, the previously permitted Screen Hub UK proposals and the future year with this development. All future year assessments include both the Five Points Roundabout and Sevenhills Road schemes being implemented.

Since the submission of the Transport Assessment, to address the concerns of the Highway Authority additional capacity testing has been submitted in the form of technical notes. These notes are titled;

ITL17509-024A TN Sensitivity Test Scenario ITL17509-025 TN Traffic Flow Diagrams and Comparison ITL17509-032TN ATC Analysis and Sensitivity Test 2 Parameters ITL17509-030A TN Sensitivity Test 1 [2nd issue] ITL17509-034 TN Sensitivity Test 2 ITL17509-037A cumulative Impact Assessment ITL 17509-042 TN Potential Internal Trips

This response shall address the information contained within these notes following assessment of the information contained within the Transport Assessment, and explanation of the concerns that give rise to the additional information being provided.

It should be noted that the assessments of the highway impacts assume full development build out, and the full implementation of mitigation schemes at Five Points Roundabout and Sevenhills Road. The expectation of these schemes being implemented permits the applicants to reassign traffic over the network. The reassignment approach that has been used is the same as was submitted and accepted by the Highway Authority during the application for the Sevenhills Road scheme.

The Transport Assessment sets out that the overall trip generation of this proposal is less than that for the previously permitted Screen Hub UK application. It is accepted by the applicants that this proposal will result in greater numbers of peak hour trips, but less trips in the inter peak periods and at weekends, as would be expected due to the differences in the nature of the applications, and the absence of the visitor attraction element.

The modelling results supplied cover the following junctions: • Pinewood Road /Pinewood East Access • Pinewood Road/Pinewood West Access • Pinewood Road/Sevenhills Road • A412 Denham Road/Sevenhills Road • Pinewood Road/Pinewood Green • Five Points Roundabout • A412 Church Road/Thornbridge Road(Mini Roundabout) • A412 Church Road/Bangors Road North (Mini Roundabout) • A412 / Black Park Road • Pinewood Road site accesses • A412 left in/left out access • Alderbourne Farm site access

The above modelling uses the same models that were submitted for previous applications and therefore the geometry, calibration and fixed parameters within them has been checked and accepted by the Highway Authority.

A summary of the modelling impact assessment comparing the 'without development' against the 'with development including mitigation' is shown below (taken from table 13.23 of the Transport Assessment). This table includes the summary of the assessment of the

SHUK to provide a comparison between the two schemes. It is helpful to understand this given that the Highway Authority has previously accepted that impact.

Table 13.23: Summary of Traffic Impact Analysis

Junction	Do Nothing	With SHUK	With Development
Pinewood Road / Pinewood East Access	Below Capacity	Below Capacity	Below Capacity
Pinewood Road / Pinewood West Access	Below Maximum Capacity	Below Maximum Capacity, with reduced queuing and delay compared with Do Nothing	Below Maximum Capacity, with reduced queuing and delay compared with Do Nothing
Pinewood Road / Sevenhills Road	Below Capacity	Below Capacity (with new roundabout)	Below Capacity (with new roundabout)
A412 Denham Road / Sevenhills Road	Over Capacity	Below Capacity (with new signals)	Below Capacity (with new signals)
Pinewood Road / Pinewood Green	Below Capacity	Below Capacity	Below Capacity
Five Points Roundabout	Below Capacity (with new signals)	Below Capacity (with new signals and SHR upgrade)	Below Capacity (with new signals and SHR upgrade)
A412 Church Road / Thornbridge Road	Over Capacity	Over Capacity, but with reduced queuing and delay compared with Do Nothing	Over Capacity, but with reduced queuing and delay compared with Do Nothing
A412 Church Road / Bangors Road North / A412 Denham Road	Below Maximum Capacity	Below Maximum Capacity, with reduced queuing and delay compared with Do Nothing	Below Maximum Capacity, with reduced queuing and delay compared with Do Nothing
A412 Uxbridge Road / Black Park Road	Below Capacity	Below Capacity	Below Capacity

The following assessment description focuses on the primary junctions impacted by development traffic which are: the A12 Denham Road/ Sevenhills Road; the two mini roundabouts on Church Road with Thornbridge Road; Bangors Road respectively and Five Points Roundabout. Points of access and junctions that are minimally affected have also been reviewed.

A412 Denham road/Sevenhills road

This junction is operating over capacity with long wait times on Sevenhills Road, this relates to the extremely dominant flow along the A412 at this location preventing the opportunity for vehicles to turn right into Sevenhills Road or to exit Sevenhills Road. The modelling results reflect this with movements at this junction being reported as having an RFC of greater than 1, and on Sevenhills Road in excess of 2. The generally agreed practical capacity of a junction is at an RFC of 0.85 or 85%. While junctions can still operate within theoretical capacity with an RFC value of up to 1 (100%), as theoretical capacity approaches 100%, delays will increase significantly. Without mitigation at this junction the results in the future

year (2036) with development traffic, leads to an infinite result, indicating that the junction performance deteriorates to such an extreme that the model is no longer able to provide any functional estimation of the situation.

With the signals in place the results improve, providing control of the dominant flows, and enabling right hand turn manoeuvres to be undertaken in a safe manner with controlled turning movements, (it should be noted that traffic signals modelling results are reported in a different manner), and the Sevenhills road arm of the junction operates just within capacity. Queuing and delay are reduced on Sevenhills Road with the most noticeable improvements within the AM peak hours. With the provision of signals and the new development traffic the junction performance comes close to the theoretical capacity, and this is due to new turning volumes. A further sensitivity test has been undertaken to consider the impact of higher development flows at the junction. This is discussed further in the later sections of this response.

A412 Junctions with Thornbridge Road

The Thornbridge Road junction is shown to be operating close to its practical capacity at present and with particular issues occurring in the PM peaks on Thornbridge Road. In the future development year (2036) the situation on this arm improves relative to the situation that would occur due to background growth alone (no development or mitigation), due to reassignment of traffic onto Sevenhills Road. However, whether the development comes forward the A412 arms will remain at or over the maximum capacity.

Bangors Road North

The situation at Bangors Road North is similar, however the results are more favourable than those for Thornbridge Road with the junction performing within theoretical capacity in all scenarios.

Five Points Roundabout

The Five Points Roundabout junction has been modelled only as a signalised junction in the future years, this is due to the requirement incumbent on Pinewood Studios to deliver a scheme to introduce signals at this junction as part of the 2013 PSDF permission. The results demonstrate that the junction will operate in the 2036 year within capacity, with the greatest demands being placed on the A412 Church Road, Wood Lane and the A412 Uxbridge Road. Similarly, the Highway Authority recognises the sensitivity of this junction and the need to ensure that this assessment is robust. Therefore, the sensitivity testing that was required has looked at this junction again.

Site Access Junctions

The site access junctions have been shown to have surplus capacity and therefore the Highway Authority does not have concerns regarding this, subject to the previously discussed requirements to ensure that the security measures that are presented within a reserved matters application to not cause the traffic using these junctions to queue back to the public highway and therefore negate these findings.

Pinewood Green

The junction of Pinewood Green with Pinewood Road operates with surplus capacity due to the re-routing of traffic onto Sevenhills Road. It is expected that with the introduction of the Sevenhills Road scheme less traffic will use Pinewood Green to access the site.

Fulmer

The Transport Assessment proceeds to make assessments of roads to the north and west of the site as well as Pinewood Green. With respect to the north and west (Fulmer parish) it is the Highway Authority's position that there is an impact on this area as a result of the development. This impact is small enough to not warrant junction assessments in this area, but significant enough that the proposed contribution to highway schemes within the parish should be secured to mitigate the impacts of additional through traffic and in recognition of the safety concerns within the parish, regarding speed and highway layout. A contribution is proposed in a similar way for schemes within Iver Parish, the Highway Authority is of the same view with respect to this as that for Fulmer.

The Sevenhills Road mitigation also serves to provide a suitable alternative to the route through Pinewood Green which is not appropriate for development traffic being a residential area with a width restriction in its centre. At the junction of Thornbridge Road with the A412 there is an existing congestion issue, compounded by parking for the local shops and services. Development traffic being added to this junction gives rise to safety concerns due to the effective reduction in available carriageway and reduced opportunities for the passing of vehicles. Pedestrian safety is also a concern in an area that suffers from such congestion being present where there are parking manoeuvres taking place.

There is no information contained within the application documents as to how much of the development can be occupied before Sevenhills Road is delivered. The Highway Authority requested an assessment to identify a trigger point at which the mitigation would need to be delivered however the applicants have declined to provide this information. In the absence of a submission being present, in order to identify the trigger for the mitigation being necessary a further assessment shall be conditioned to be submitted prior to commencement and at the point of the first reserved matters application. The Highway Authority notes that the current permission for the Sevenhills Road Scheme (PL/19/4430/FA) requires that the scheme is completed and open within 18 months from commencement on site. This requirement is considered to be a requirement of any renewals of permission to ensure that the mitigation is complete and delivered in a timely way.

It is also proposed that a tarmac footway shall be provided along Pinewood Road to the north of Pinewood East roundabout. This provides pedestrian access to the Alderbourne Farm site for both the backlots and the public access nature reserve.

This development represents significant increases in traffic volumes during the peak hours, and lower impacts in the off peak periods. The SHR scheme provides opportunity to route some of the development traffic away from existing locations of congestion resulting in an impact that is less than severe.

Opportunities for Sustainable travel

To address matters of sustainable transport a Framework Travel Plan (FTP) has been submitted as part of the planning application. The FTP sets out the current mode shares on the site, and the parameters against which targets for changes in mode share are to be set. It also sets out at a high level the measures by which the travel plans shall seek to achieve those targets. These are to be delivered in conjunction with the existing travel planning taking place on the site.

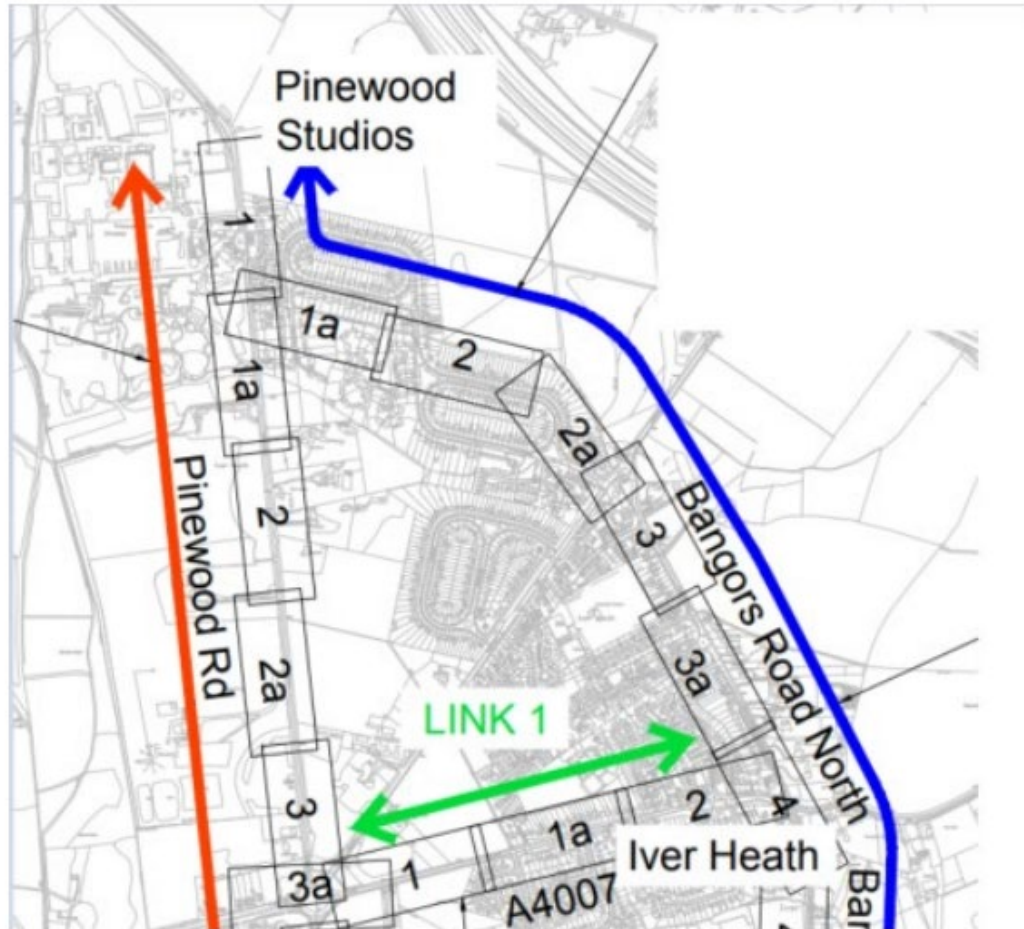
The Highway Authority accepts the Framework Travel Plan (issue 2 revision E) and shall condition this as the basis for detailed travel plans to be submitted as part of reserved matters applications. It is also proposed that the existing shuttle bus services provided by Pinewood to employees and users of the studios will be expanded to cover the new studios space. This is agreed by the Highway Authority as necessary in order to provide connectivity to other public transport hubs given the particularly low level of provision in the Ivers of commercial bus services.

The travel plan is supported by the provision of a signing strategy for all modes of transport that covers the whole of the Ivers Parish and extends to the M40 Junction 1 in the north. This shall be conditioned to be delivered in full prior to occupation of the site to ensure that staff and visitors have the best available information regarding routing for all modes of transport.

Pedestrian and cycling facilities will be present within the Five Points Roundabout scheme which shall improve access to the site over this junction that is currently a barrier to walking and cycling in the area.

The Highway Authority has considered the wider matters regarding the sustainability of the site and the ability of future people accessing the site, in addition to the findings of previous Planning Inspectors and the Secretary of State regarding the sustainability of the site. The development must meet the following requirements of the NPPF paragraph 110; Appropriate opportunities to promote sustainable transport modes can be – or have been – taken up given the type of development and its location.

Both Langley and Iver rail stations are within cycling distance of the studios. The Ivers Cycle Strategy identifies cycle schemes which link Pinewood studios to these rail stations and the local area. The securing of a contribution (relative to the scale and kind of the development) to either a route to Iver or Langley station would enable the development to meet the above NPPF para 110. The Highway Authority proposes this application secures a contribution to enable the delivery of the northern section of the Pinewood - Iver station cycle route. The parts of the route to be secured are along the A4007 Slough Road and through Pinewood Green and Bangors Road north. The sections of routes a financial contribution is sought for enable their full delivery and are identified in the below diagram coloured in blue and green



These routes complement the existing provision that has been made on Pinewood Road between Five Points Roundabout and the studios entrance. They will form options for those approaching from Iver village and station or the Uxbridge area to reach the different access points to the studios.

Construction Traffic

The application does not address the construction traffic impacts within the documentation; however, these are temporary impacts on the highway network and so do not form part of the assessment of this application. The Highway Authority will be conditioning a full Construction Traffic Management Plan, as is standard practice with large sites. This shall be required to be submitted for approval prior to commencement.

Conclusions

To conclude, the Highway Authority has determined that the assessment that has been undertaken, inclusive of the additional information and the conditions and obligations recommended demonstrates that the proposals: - do not give rise to a severe impact on the highway network; - safe and suitable travel can be achieved by all uses; - opportunities to promote sustainable travel have been take up given the type of development and location; and - once the full mitigation package is delivered in its entirety the significant impacts of the development on the transport network in terms of capacity, congestion and highway safety will be effectively mitigated to an acceptable degree.

Mindful of the above the Highway Authority have no objections subject to the obligations and conditions set out below:

National Highways – 15 September 2022

National Highways Ref: 95782

Referring to the consultation letters dated 10th and 25th August 2022 on the planning application referenced above, in the vicinity of the M25 and M40 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- ~~a) offer no objection (see reasons at Annex A);~~
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~
- c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);**
- ~~d) recommend that the application be refused (see reasons at Annex A)~~

National Highways Planning Response (NHPR 21-09) September 2021 Highways Act 1980 Section 175B is not relevant to this application.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.

Annex A National Highways' assessment of the proposed development

National Highways ("we") has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

National Highways are concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case the M25 and M40, in particular the M40 Denham Interchange.

We have reviewed the supporting Transport Assessment (TA), dated 11th July 2022.

The site is split to the north and south of the existing Pinewood Studios. Details about the site, the area and the proposed development are included in the TA. It is understood that the site currently has several existing uses. The proposal is to develop land to the south of the existing studios to deliver additional production studios space, an education hub and a business growth hub. On land to the north at Alderbourne Farm the proposed scheme includes the provision of backlots, workshops and a nature reserve.

It is understood that whilst it is anticipated that there will be a Framework Travel Plan (FTP) in place aiming to promote multiple occupancy car use and limit the use of cars entirely, the traffic impact analysis set out in the TA is not contingent on this being met immediately, i.e. the estimated traffic generation assumes that existing mode share will continue and is therefore a 'worse case'.

Whilst the submitted TA references the Screen Hub UK (SHUK) scheme, which has been given planning approval (PL/20/3280/OA), it does not appear that National Highways were consulted on this planning application.

The proposed methodology for determining the existing and proposed trip generation seems logical. Clarification as to the distribution of new trips onto the network is required in regard to the methodology for each land use and an explanation why the SHUK scheme is used to compare the proposed development against except for the delivery of the Seven Hills Road Improvement scheme (SHR). The TA in section 10.6.1 states that the SHR would be delivered as part of the Pinewood South proposal as an alternative to SHUK anyway.

Based on the trip generation methodology outlined in the TA, the net difference between the existing land used and the proposed is shown to have an increase in both the AM peak and PM peak. The Applicant should provide a net difference table indicating the change in vehicle trips from the existing to the proposed development during the AM peak 0800-0900 and the PM peak 1700-1800.

The distribution and junction modelling included in the TA does not cover the SRN. The TA states that the primary route to the studios is from the M40, with the implementation of local junction improvements limiting traffic through Iver Heath and Pinewood Green. It is requested that the Applicant provide the traffic flow impact information during the AM and PM peak hours of 0800-0900 and 1700-1800 at the M40 Denham Interchange on all arms in the form of flow diagrams to allow National Highways to understand the impact on the SRN.

On the basis of a proposed net trip increase, additional data collection and junction impact assessment maybe be required at:

- M40 Denham Interchange

This would require a year opening with all development traffic assessment to be undertaken, as per DfT Circular 02/13.

In addition to the above the Applicant should consider the impact of construction. A Construction Environment Management Plan (CEMP) will be a recommended condition should all other outstanding matters be resolved. This should include; construction traffic routes, trip numbers, parking and turning provision to be made on site, measures to prevent debris from being deposited on the highway, delivery times and a programme for construction.

The Applicant proposes a signage strategy that changes signage on the M40 Denham Interchange, shown in TA Image 10.2. Further detail is required in relation to the proposed changes (i.e. what wording is proposed to be added to the signage). We will then be able to inform applicant of further steps to be undertaken as this is a separate matter to the planning proposal and will entail consulting other colleagues in our organisation.

Recommended Non-Approval

It is recommended that the application (Ref: PL/22/2657/FA) should not be approved for a period of 56 days (until 8th November 2022) from the date of this recommendation to allow the applicant time to respond to the outstanding technical matters.

Reason: To allow National Highways to understand the impact of the development on the safe and efficient operation of the Strategic Road Network and provide the Local Planning Authority with fully informed advice.

National Highways – 10 November 2022

National Highways Ref: 95782

Referring to the consultation letters dated 10th and 25th August 2022 on the planning application referenced above, in the vicinity of the M25 and M40 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- ~~a) offer no objection (see reasons at Annex A);~~
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~
- c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);**
- ~~d) recommend that the application be refused (see reasons at Annex A)~~

National Highways Planning Response (NHPR 21-09) September 2021 Highways Act 1980 Section 175B is not relevant to this application.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.

Annex A National Highways' assessment of the proposed development

National Highways (“we”) has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

National Highways are concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case the M25 and M40, in particular the M40 Denham Interchange.

National Highways have reviewed the Pinewood Studios Screen Hub: Response to National Highways dated 3 October 2022 Technical Note. We have also reviewed the supporting Transport Assessment (TA), dated 11th July 2022. A number of outstanding actions remain and the applicant has submitted a second Technical Note Pinewood Studios Screen Hub: 2nd Response to National Highways dated 3 November 2022 which is in the process of being reviewed.

The site is split to the north and south of the existing Pinewood Studios. Details about the site, the area and the proposed development are included in the TA. It is understood that the site currently has several existing uses. The proposal is to develop land to the south of the existing studios to deliver additional production studios space, an education hub and a business growth hub. On land to the north at Alderbourne Farm the proposed scheme includes the provision of backlots, workshops and a nature reserve.

It is understood that whilst it is anticipated that there will be a Framework Travel Plan (FTP) in place aiming to promote multiple occupancy car use and limit the use of cars entirely, the traffic impact analysis set out in the TA is not contingent on this being met immediately, i.e. the estimated traffic generation assumes that existing mode share will continue and is therefore a ‘worse case’.

Whilst the submitted TA references the Screen Hub UK (SHUK) scheme, which has been given planning approval (PL/20/3280/OA), it does not appear that National Highways were consulted on this planning application.

The proposed methodology for determining the existing and proposed trip generation seems logical. Clarification has been sought as to the distribution of new trips onto the network in regard to the methodology for each land use. Whilst the distribution methodologies for the business growth and education hub are accepted, discrepancies in the ANPR data used for the distribution of the new studio production space have been noted and further details provided are in the process of being reviewed.

Based on the trip generation methodology outlined in the TA, the net difference between the existing and proposed land uses is shown to have an increase in both the AM peak 0800-0900 and PM peak 1700-1800. Whilst a net difference table has been provided further detail is required to demonstrate the turning movements through the junction and in particular the volume of additional trips on the on and off-slips of the M40 and A40.

It is requested that the Applicant provide the net traffic flow impact information during the AM and PM peak hours of 0800-0900 and 1700-1800 at the M40 Denham Interchange on all arms in the form of flow diagrams to allow National Highways to understand the impact on the SRN.

On the basis of a proposed net trip increase, additional data collection and junction impact assessment may be required at:

- M40 Denham Interchange

This would require a year of opening with all development traffic assessment to be undertaken, as per DfT Circular 02/13.

In addition to the above the Applicant should consider the impact of construction. A Construction Environment Management Plan (CEMP) will be a recommended condition should all other outstanding matters be resolved. This should include; construction traffic routes, trip numbers, parking and turning provision to be made on site, measures to prevent debris from being deposited on the highway, delivery times and a programme for construction.

The Applicant proposes a signage strategy that changes signage on the M40 Denham Interchange, shown in TA Image 10.2. The proposed signage strategy includes a series of local network signs to direct traffic to use Sevenhills Road rather than travelling through Iver Heath, clearer signage at the M40 Denham Interchange and signage for cyclists from the local area. It is noted that the A412 Denham Road provides the only route to and from the M40 and hence it should be considered whether signage is required at the M40 Denham Interchange to support the wider signage strategy. If signage is provided at the M40 Denham Interchange, National Highways recommend that signage is provided also on the eastbound M40 off-slip. Any proposed changes or additional signage within the SRN highway boundary will require approval from the Safety, Engineering and Standards (SES) team at National Highways to mitigate and maintain the safety and efficient operation of the SRN.

In light of additional actions identified following a review of a Technical Note prepared by iTransport titled 'Pinewood Studios Screen Hub: Response to National Highways' (Technical Note) dated 3 October 2022 and a subsequent Technical Note dated 3 November 2022, which is currently under review, ongoing discussions regarding the impact of the proposed development on the M40 Denham Interchange are taking place.

Recommended Non-Approval

It is recommended that the application (Ref: PL/22/2657/FA) should not be approved for a period of 56 days (until 3rd January 2023) from the date of this recommendation to allow the applicant time to respond to the outstanding technical matters. Reason: To allow National Highways to understand the impact of the development on the safe and efficient operation of the Strategic Road Network and provide the Local Planning Authority with fully informed advice.

National Highways – 25 November 2022

National Highways Ref: 95782

Referring to the consultation on a planning application dated 10th and 25th August 2022 referenced above, in the vicinity of the M25 and M40 at that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- a) ~~offer no objection (see reasons at Annex A);~~
- b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);**
- c) ~~recommend that planning permission not be granted for a specified period (see reasons at Annex A);~~
- d) ~~recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.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.

Annex A National Highways' assessment of the proposed development

National Highways ("we") has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Recommendation:

that conditions should be attached to any planning permission that may be granted:

Reasons:

We will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case, particularly within the vicinity of the M25 and M40, in particular the M40 Denham Interchange.

National Highways concludes that sufficient information has been provided by the applicant to assess the impact of the development on the safe and efficient operation of the Strategic Road Network, particularly at the M40 Denham Interchange.

Having assessed application PL/22/2657/FA we are content that the proposals, if permitted, would not have an unacceptable impact on the safety, reliability, and/or operational efficiency of the Strategic Road Network in the vicinity of the site (M25 and M40)), provided that the following conditions are imposed, (reflecting the DfT Circular 02/13 Para 8 -11 and MHCLG NPPF 2021 Para 110-113 tests).

As the signage strategy for the site is developed, we strongly recommend early engagement with National Highways if it is intended to locate signs on or close to the M40.

National Highways recommends that the following conditions are implemented within any planning permission granted:

1. No works shall commence on the site hereby permitted (including site clearance or preparation) until the details of a Construction Environmental Management Plan have been submitted to and approved in writing by the local planning authority (who shall consult with National Highways). Thereafter the construction of the development shall proceed in strict accordance with the approved Construction Environmental Management Plan unless otherwise agreed in writing by the local planning authority (who shall consult National Highways).

Reason: To ensure that the M25 and M40 Trunk Road, alongside the M40 Denham Interchange continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety.

Informative: The CEMP shall include details (text, maps, and drawings as appropriate) of the scale, timing and mitigation of all construction related aspects of

the development. It will include but is not limited to: site hours of operation; numbers, frequency, routing and type of vehicles visiting the site (including measures to limit delivery journeys on the SRN during highway peak hours such as the use vehicle booking systems etc); measures to ensure that HGV loads are adequately secured, travel plan and guided access/egress and parking arrangements for site workers, visitors and deliveries; plus sheeting of loose loads and wheel washing and other facilities to prevent dust, dirt, detritus etc from entering the public highway (and means to remove if it occurs).

National Highways – 25 November 2022

Thank you for your Technical Note dated 3 November 2022, consulting National Highways (formerly as Highways England) on the Pinewood Studios Screen Hub: 2nd Response to National Highways Technical Note.

We have been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

As such, we will be concerned with plans or proposals that have the potential to impact on the safe, reliable and efficient operation of the SRN, in this case, the M25 and M40, in particular the M40 Denham Interchange.

We have reviewed the supplied Technical Note, considering the actions identified in the National Highways email dated 21 October 2022. We conclude that no further actions are required to fully assess the impacts of the proposed development on the SRN.

As the signage strategy for the site is developed, we strongly recommend early engagement with National Highways if it is intended to locate signs on or close to the M40.

Please find attached our formal NHPR response recommending a planning condition for a Construction Environmental Management Plan be attached to any permission which may be granted.

National Highways – 25 November 2022

Land South of Pinewood Studios and Alderbourne Farm

Pinewood Studios Screen Hub – Response to National Highways – 2nd Technical Note Review

Purpose of Report

1.1 This Technical Report has been prepared by SYSTRA on behalf of National Highways following a review of a Technical Note prepared by i-Transport titled 'Pinewood Studios Screen Hub: 2 nd Response to National Highways' (2 nd Technical Note) dated 3 November 2022 (ref: ITL17509- 029 TN).

1.2 The Pinewood Studio Screen Hub (PSSH) application was validated on the 29 July 2022 (ref: PL/22/2657/FA).

1.3 National Highways were consulted on the Transport Assessment prepared to support the planning application in August 2022 and provided a NHPR Holding recommendation dated 15 September 2022, which recommended that planning permission should not be approved for a period of 56 days (until 8 November 2022) from the date of the recommendation to allow the applicant time to respond to the outstanding technical matters.

1.4 In response to the outstanding technical matters, i-Transport prepared a Technical Note (1st Technical Note) dated 3 October 2022. National Highways reviewed this Technical Note and concluded a number of outstanding actions remain. In response to the outstanding actions, iTransport prepared a 2nd Technical Note, dated 3 November 2022.

1.5 National Highways provided a NHPR Holding recommendation dated 8 November 2022 which recommended that planning permission should not be approved for a period of 56 days (until 3 January 2023). It is noted that upon completion of the review of the 2nd Technical Note, should all actions be satisfactorily resolved it is possible for a new NHPR from to be issued revoking the holding response recommendation prior to its expiry date.

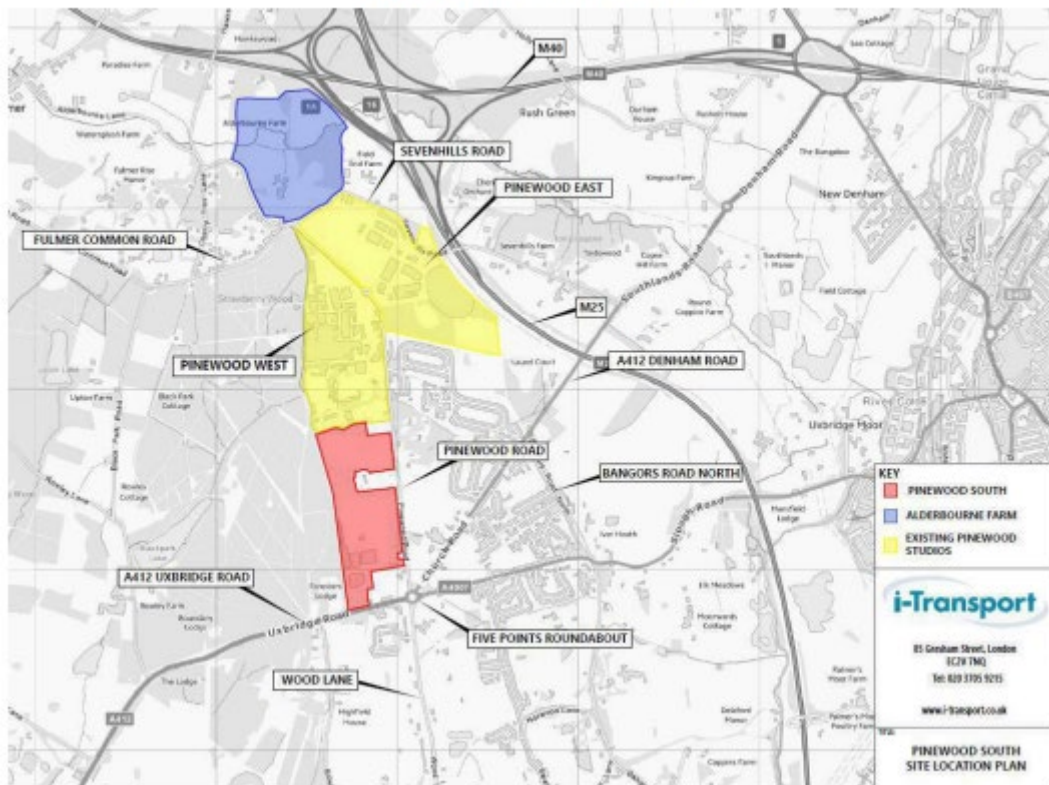
1.6 The headings below correlate to sections within the Response to National Highways 2nd Technical Note which have been reviewed, and any outstanding actions are noted.

Technical Note Review and Outstanding Actions

Background

1.7 The site location is noted in Figure 1 below. Figure 1. Site Location plan

Figure 1. Site Location plan



1.8 The site is split to the north and south of the existing Pinewood Studios. Details about the site, the area and the proposed development are included in the TA and 1st Technical Note. It is understood that the site currently has several existing uses. The proposal is to develop land to the south of the existing studios to deliver additional production studios space, an education hub and a business growth hub. On land to the north at Alderbourne Farm the proposed scheme includes the provision of backlots, workshops and a nature reserve.

1.9 National Highways are concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case the M25 and M40, in particular the M40 Denham Interchange.

1.10 PSSH is an alternative scheme to SHUK, which has planning permission (ref: PL/20/3280/OA). As noted in the National Highway response email dated 21 October 2022, it does not appear that National Highways were consulted on this planning application.

1.11 The 2nd Technical Note outlines a response to the NH email dated 21 October 2022, for the following actions:

- Clarification of the production space land use traffic distribution discrepancies at the Denham Interchange and the A412 Denham Road / Sevenhills Road junction.
- Net traffic flow diagrams are requested at the Denham Interchange.
- Clarification on whether the ongoing sensitivity test assessments discussed with Buckinghamshire Council (BC) alter the conclusions and net trip generation at the Denham Interchange.

- Confirmation that a Construction Environmental Management Plan (CEMP) will be secured via Condition.
- Further comments on the proposed signage strategy.

1.12 This report outlines the actions in the email dated 21 October 2022, in bold italics and provides commentary on each item below on the acceptability of the additional information and justification of approach provided.

Production Space Traffic Distribution Clarifications

1.13 In the NH response dated 21 October 2022, the following clarification was requested **“Applicant to provide clarity on the Production Space Land Use traffic distribution discrepancies at the Denham Interchange and A412 Denham Road. Trip Generation and Net Traffic Impact.”**

1.14 NH requested clarification on discrepancies for the production space traffic distribution for the Denham Interchange shown within Appendix D Figures 1a and 1b, as the figures do not match the Pinewood East traffic distributions for the A412 Denham Road, listed within Appendix C Tables 3.3 or 3.4 of the 1st Technical Note. The distributions have been derived using ANPR data. Table 3.4 in Appendix C and Figure 1b in Appendix D is replicated below

Table 1. Traffic Assignment – A412 Denham Road

Table 3.4: Existing Traffic Assignment – Between Pinewood East and the A412 Denham Road (0700 – 0900 and 1700 – 1900)

	0700– 0900		1700 – 1900	
	Arrivals	Departures	Arrival	Departures
Via Pinewood Road / Sevenhills Road	7%	3%	5%	9%
Via Pinewood Green	15%	21%	5%	19%
Via A412 Church Road	3%	3%	0%	7%
Total	25%	27%	10%	35%

Table 2. ANPR Traffic Distribution

Arrivals											
Destination	Time Period	Origin									
		Aldbourne Rd	Fulmer C. Rd	A412 Denham Road (NE)			A4807	Wood Ln	A412 (W)	Bangors Rd N	
				via Sevenhills Rd	via Pinewood Gr	via A412 Church Road					
Pinewood W	0700 - 0900	75	171	56	209	29	52	257	115	54	
	1700 - 1900	7	15	6	23	10	15	44	37	2	
Pinewood E	0700 - 0900	39	55	22	49	9	17	79	45	3	
	1700 - 1900	1	3	1	1	0	0	4	8	1	

Proportion of Studios Traffic travelling to each Destination in Peak Periods 0700-0900 & 1700-1900.

Departures											
Origin	Time Period	Destination									
		Aldbourne Rd	Fulmer C. Rd	A412 Denham Road (NE)			A4807	Wood Ln	A412 (W)	Bangors Rd N	
				via Sevenhills Rd	via Pinewood Gr	via A412 Church Road					
Pinewood W	0700 - 0900	3%	12%	1%	16%	14%	21%	20%	7%	7%	
	1700 - 1900	6%	16%	6%	26%	5%	7%	21%	13%	1%	
Pinewood E	0700 - 0900	6%	28%	3%	21%	3%	17%	17%	10%	6%	
	1700 - 1900	7%	15%	9%	19%	7%	8%	19%	15%	2%	

Arrivals											
Destination	Time Period	Origin									
		Aldbourne Rd	Fulmer C. Rd	A412 Denham Road (NE)			A4807	Wood Ln	A412 (W)	Bangors Rd N	
				via Sevenhills Rd	via Pinewood Gr	via A412 Church Road					
Pinewood W	0700 - 0900	8%	17%	6%	21%	8%	5%	26%	12%	1%	
	1700 - 1900	4%	8%	4%	14%	4%	6%	28%	23%	1%	
Pinewood E	0700 - 0900	12%	17%	7%	15%	3%	5%	23%	14%	1%	
	1700 - 1900	3%	16%	5%	9%	0%	0%	21%	42%	3%	

1.19 This data notes that Pinewood Green should have a 5% traffic distribution in the evening for arrivals, and not 6%, as the applicant has suggested. However, NH note that rounding discrepancies in the table above do allow for a 1% uplift in distribution, and using a 6% distribution is more robust than 5% and given the resultant volume of trips it would not alter conclusions regarding the assessment of impacts at the M40 Denham interchange.

1.20 This approach is therefore considered suitable, with any discrepancies having been justified by the applicant. No further action is required.

Net Traffic Flows at the Denham Interchange

1.21 In the NH response dated 21 October 2022, the following was requested ***“The applicant to provide a net vehicle traffic junction flow diagram at the M40 Denham Interchange to clearly demonstrate the turning movements through the junction and in particular the volume of additional trips on the on and off-slips of the M40 and A40.”***

1.22 Table 3 below, copied from the 2nd Technical Note presents the net impact of vehicle trips on the Denham interchange. In total across all arms of the Denham interchange the total peak two-way flows is a net increase of 53 vehicle trips in the AM (07:00-08:00) and a net reduction of eight vehicle trips in the PM (17:30-18:30). During a meeting with i-Transport on 14 November 2022, it was confirmed that the proposed development trips were highest during the 07:00-08:00 and 17:30-18:30 time periods, given the shift patterns of employees at Pinewood studios. Therefore whilst the 08:00-09:00 and 17:00-18:00 standard SRN network peak has not been provided, the peak proposed development trips provide a robust assessment to judge the potential net change impact at the M40 Denham Interchange.

Table 3. Total Vehicle Net trip Generation Assessment

Table 4.5: Net Impact on M40 Denham Interchange

Arm	AM Peak Hour 1 (0700 – 0800)	AM Peak Hour 2 (0715 – 0815)	PM Peak Hour 1 (1715 – 1815)	PM Peak Hour 2 (1730 – 1830)
A40 Western Avenue	+13	+6	+1	+1
A4020 Oxford Road	+0	+0	+0	+0
A412 Denham Road	+8	+11	-21	-11
M40	+29	+14	+2	+2
A40 Oxford Road	+3	+1	+0	+0
Denham Court Drive	+0	+0	+0	+0

1.23 In response to the action, the applicant has provided net vehicle traffic junction flow diagrams, showing the net vehicle trip generation at the M40 Denham Interchange to clearly demonstrate the turning movements through the junction. These diagrams are presented in Image 3.1 to Image 3.4 in the 2nd Technical Note.

1.24 It should be noted that given that the assessment is a net vehicle uplift of the proposed development compared to the consented SHUK scheme the net assessment only presents the level of trips over and above what has already received consent. From a review of the traffic flow diagrams and distribution presented in the SHUK application documents, whilst the flow diagrams do not extend to the M40 Denham Interchange, it is noted that between 116 and 128 two-way trips in the 07:00-08:00 and 07:15-08:15 periods respectively are routed along the A412 Denham Road, north of the junction with Sevenhills Road, suggesting that a significant proportion of these trips would route through the M40 Denham Interchange. In the PM peak (17:15-18:15) this quantum increases to 212 two-way trips.

1.25 Given the SHUK scheme received planning consent in April 2022, the applicant has considered a net assessment given this represents the fall back position should the planning permission for the proposed development not be granted. **1.26** However based on the highest potential for a net uplift of trips of 53 trips through the M40 Denham Interchange, it is considered that this level of additional trip generation would not warrant further modelling assessment at the junction. The M40 EB off slip generates an additional 29 trips in the AM and a net reduction to the M40 WB on slip in the PM peak compared to the consented scheme. This level of additional trips would not typically warrant further modelling assessments or merge/diverge assessments. Whilst the proposed development in its entirety would warrant further assessment, the net impact assessment does not warrant further assessment. Given the consent granted to SHUK scheme, NH will not be in a position to request additional modelling assessments on the basis of the proposed development. Therefore no further action is required.

Sensitivity Testing

1.27 In the NH response dated 21 October 2022, the following point was raised
“Clarification is sought as to whether ongoing assessments visible on the planning portal

presented in subsequent Technical Notes by i-Transport regarding trip generation sensitivity testing (dated 11th October 2022) and traffic flow distribution (13th October 2022) alter the conclusions and net trip generation for the M40 Denham interchange presented in Table 4.5 of the Technical Note. [1st Technical Note]

1.28 In response to this point, the applicant has commented that on-going discussions with BC are in relation pinch points on the local road network. i-transport has undertaken sensitivity assessments at the Five Points Roundabout (junction proposed to be signalised) and the A412 Denham Road/ Sevenhill Road junction (proposed to be signalised as part of the wider Sevenhills Road improvement scheme) in order to future proof the junction improvement schemes as a worst case sensitivity test.

1.29 The applicant notes that any sensitivity testing does not impact the distribution of vehicles on the SRN, with all vehicles routed via the Five Points Roundabout and the A412 Denham Road/ Sevenhills Road junction, using the M40 Denham Interchange. Therefore, no sensitivity treating is required on the M40 Denham Interchange.

1.30 NH agree that no further sensitivity testing is required for the SRN as the distribution of vehicles and net trip generation in all scenarios, remains the same. No further action is required.

Construction Environmental Management Plan

1.31 In the NH response dated 21 October 2022, the following point was noted ***“A Construction Environment Management Plan (CEMP) will be a recommended condition should all other outstanding matters be resolved. This should include; construction traffic routes, trip numbers, parking and turning provision to be made on site, measures to prevent debris from being deposited on the highway, delivery times and a programme for construction”.***

1.32 The applicant has agreed that a CEMP should be secured via a planning condition.

1.33 The following recommended wording for the planning condition has been provided in the associated NHPR form alongside this Technical Note.

- **Condition:** No works shall commence on the site hereby permitted (including site clearance or preparation) until the details of a Construction Environmental Management Plan have been submitted to and approved in writing by the local planning authority (who shall consult with National Highways). Thereafter the construction of the development shall proceed in strict accordance with the approved Construction Environmental Management Plan unless otherwise agreed in writing by the local planning authority (who shall consult National Highways).
- **Reason:** To ensure that the M25 and M40 Trunk Road, alongside the M40 Denham Interchange continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety.
- **Informative:** The CEMP shall include details (text, maps, and drawings as appropriate) of the scale, timing and mitigation of all construction related aspects of

the development. It will include but is not limited to: site hours of operation; numbers, frequency, routing and type of vehicles visiting the site (including measures to limit delivery journeys on the SRN during highway peak hours such as the use vehicle booking systems etc); measures to ensure that HGV loads are adequately secured, travel plan and guided access/egress and parking arrangements for site workers, visitors and deliveries; plus sheeting of loose loads and wheel washing and other facilities to prevent dust, dirt, detritus etc from entering the public highway (and means to remove if it occurs).

Signage

1.34 In the NH response dated 21 October 2022, the following point was noted “**If signage is provided at the M40 Denham Interchange, National Highways recommend that signage is provided also on the eastbound M40 off-slip. Any proposed changes or additional signage within the SRN highway boundary will require approval from the Safety, Engineering and Standards (SES) team at National Highways to mitigate and maintain the safety and efficient operation of the SRN.**”.

1.35 The proposed signage strategy includes a series of local network signs to direct traffic to use Sevenhills Road rather than travelling through Iver Heath, clearer signage at the M40 Denham Interchange and signage for cyclists from the local area. The local network signs to direct traffic to use Sevenhills Road, rather than routing through Iver Heath appears logical, however is a matter for the Buckinghamshire Council to consider.

1.36 It is noted that the A412 Denham Road provides the only route to and from the M40 and hence it should be considered whether signage is required at the M40 Denham Interchange to support the wider signage strategy, as it is noted in the 2nd Technical Note that the signs are desirable to provide clear directions to the site, but are not essential, with no analysis in the Transport Assessment analysis being contingent to these signs being provided. Additionally, signage is provided on the A40 westbound off-slip however no signage is proposed on the M40 eastbound off-slip. If signage is provided at the M40 Denham Interchange, National Highways recommend that signage is provided also on the eastbound off-slip.

1.37 Whilst an upgrade of signage is not considered essential for the SRN, NH recommend that if BC require upgrade of signage, signage is provided in all arms of the M40 Denham Interchange. NH recommend that BC secure any signage upgrades via a planning condition and the applicant liaises with the NH SES team post- consent to agree the signage amendments to mitigate and maintain safety and efficient operation of the SRN.

Summary and Conclusions

1.38 This Technical Report has been prepared by SYSTRA on behalf of National Highways following a review of a Technical Note prepared by i-Transport titled ‘**Pinewood Studios Screen Hub: 2nd Response to National Highways’ (2nd Technical Note)** dated 3 October 2022.

1.39 National Highways are concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case the M25 and M40, in particular the M40 Denham Interchange.

1.40 The net vehicle uplift through the M40 Denham Interchange has been presented, with a total of 53 two-way trips (07:00-08:00) and a net reduction in the PM peak. The peak hours presented reflect the greatest level of proposed development trips in light of staff shift patterns and therefore reflect worst case. The M40 EB off slip generates an additional 29 trips in the AM and a net reduction to the M40 WB on slip in the PM peak compared to the consented scheme. This level of additional trips would not typically warrant further modelling assessments or merge/diverge assessments.

1.41 The actions identified in the NH response dated 21 October 2022 have been reviewed in light of additional information and assessments presented. Following review of this information, no further action is required by the applicant.

1.42 NH recommend that any signage upgrades are secured via a planning condition from BC, and if signage is provided at the M40 Denham interchange this should be provided on the M40 EB offslip and agreed with the NH Safety, Engineering and Standards (SES) department post-consent.

1.43 NH recommend approval of the application, subject to a recommended condition for a CEMP. The suggested wording for this condition has been provided within the updated NHPR form for this planning application, which is issued alongside this Technical Note.

National Highways – 20 January 2023

Thank you for your e-mail dated 21 December 2022 consulting us on the additional information in relation to this proposal.

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will be concerned with proposals that may have the potential to impact on the safe and efficient operation of the SRN, in this case, the M25 and M40, in particular the M40 Denham Interchange.

We have reviewed additional information, which included revised development description, Travel Plan and Environmental Impact Assessment. We have considered any implications of the additional information on the proposal and we are satisfied that there will be no adverse effect of the development on the SRN. Our recommendation therefore remains the

same as per our response dated 22 November 2022 when we recommended CEMP condition.

However, we note that applicant's planners (Turley) in their letter dated 9 December 2022 objected to the wording, more specifically, to the inclusion of phrase (unless otherwise agreed in writing) as not being an acceptable formulation for legal reasons, and requested for it to be deleted. Whilst our response was a formal response, we do not have a power of direction and the condition was only a recommendation, so the Local Planning Authority is fully within their own right to word condition as appropriate for the purpose of their 'Final Decision' to ensure it is enforceable. If the authority wishes us to amend the wording and resend the formal recommendation we would be very happy to do so. If that is required please inform us via our team's inbox: planningse@nationalhighways.co.uk

National Highways – 27 January 2023

Thank you for your initial e-mail dated 21 December 2022 consulting us in relation to this proposal. We have also received Technical Note (ref: JCB/ITL17509- 043A) on 23 January 2023 from i-Transport (Duncan Finlay) and the same TN directly from you on 26 January 2023, providing additional information, clarifying an inaccuracy in the information previously provided. National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will be concerned with proposals that may have the potential to impact on the safe and efficient operation of the SRN, in this case, the M25 and M40, in particular the M40 Denham Interchange. We have now reviewed additional information, which related to an increase in studio floorspace to be built out for the committed (but unbuilt) Pinewood Studios Development Framework (PSDF) from 8,203sqm to 14,102sqm, which wasn't considered in previous cumulative assessments and effectively increases the overall floorspace by 5,899 sqm. The applicant has applied the agreed Pinewood Studios trip rates to this additional 5,899sqm uplift. We have considered implications of the resultant additional vehicular trips routing via the M40 Denham interchange over the trip levels previously assessed, which is a maximum of 7 trips in the AM and 8 trips in the PM. Overall, there are a maximum of 60 additional trips generated in the AM peak (07:00-08:00), including 33 trips on the M40 eastbound off-slip. Based on the minor increase of trips, our recommendation therefore remains the same, as per our response dated 25 November 2022, when we recommended CEMP condition (response is attached for convenience).

National Planning Casework Unit – 15 August 2022

I acknowledge receipt of the environmental statement relating to the above proposal.

I confirm that we have no comments to make on the environmental statement.

Natural England – 1 September 2022

Thank you for your consultation on the above dated 10 August 2022 which was received by Natural England on the same day.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION - SUBJECT TO APPROPRIATE MITIGATION BEING SECURED

We consider that without appropriate mitigation the application would:

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

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

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

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

Natural England's further advice on other natural environment issues is set out below.

Further advice on mitigation

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

Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 281 (6) of the Wildlife and Countryside Act 1981 (as amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England's advice. You must also allow a further period of 21 days before the operation can commence.

Other advice

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

Green Infrastructure

We welcome the inclusion of Green Infrastructure. GI refers to the living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to provide multiple benefits including space for recreation, access to nature, flood storage and urban cooling to support climate change mitigation, food production, wildlife habitats and health & well-being improvements provided by trees, rights of way, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands.

The Natural Environment Partnership undertook Green Infrastructure Opportunities Mapping¹ which provides details of the opportunities for GI within the identified zones. The site is located within *Zone 14: Colne Valley Area* the opportunities for this zone are as follows:

- Connectivity (e.g. opportunities to connect ancient Woodland), maintaining and enhancing biodiversity
- Public Access and recreation – opportunity to improve awareness
- Buffering (e.g. around the SSSI)

We welcome the aspiration to create a Nature Reserve at Alderbourne Farm. However, to align the development with the GI opportunities above, we would advise that connectivity between Black Park Country Park and the proposed nature reserve at Alderbourne Farm is considered. The Public Right of Way (PRoW) runs to the north boundary of Black Park. It appears from the Illustrative Masterplan (drawing No. 393-FBA-02-00-DR-A-01_101) that the proposed development will block connectivity between Black Park and the Nature Reserve. It would be beneficial if public access could extend north into the proposed Nature Reserve through the landscaped area to the south west of Alderbourne Farm.

The GI buffer between Pinewood South and Black Park Country Park should ensure that the proposed development is appropriately screened from the Country Park.

In addition, it would be beneficial if the land manager of the new Nature Reserve could make themselves known to Natural England at the earliest possible eventuality, so that management of the nearby Black Park Country Park/SSSI can be considered so that both sites are managed in a mutually beneficial way.

Chilterns Area of Outstanding Natural Beauty (AONB) Proposed Extension

The proposed development is located within a proposed area of search which Natural England is considering as a possible boundary variation to the Chilterns Area of Outstanding Natural Beauty (AONB). Although the assessment process does not confer any additional planning protection, the impact of the proposal on the natural beauty of this area may be a material consideration in the determination of the development proposal.) Natural England considers the Chilterns to be a valued landscape in line with paragraph 174 of the National Planning Policy Framework (NPPF). Furthermore, paragraph 176 of the NPPF states that development in the settings of AONBs should be sensitively located and designed to avoid or minimise impacts on the designated areas. An assessment of the landscape and visual impacts of the proposal on this area should therefore be undertaken, with opportunities taken to avoid or minimise impacts on the landscape and secure enhancement opportunities. Any development should reflect or enhance the intrinsic character and natural beauty of the area and be in line with relevant development plan policies.

An extension to an existing AONB is formally designated once a variation Order, made by Natural England, is confirmed by the Defra Secretary of State. Following the issue of the designation order by Natural England, but prior to confirmation by the Secretary of State, any area that is subject to a variation Order would carry great weight as a material consideration in planning decisions.

Local sites and priority habitats and species

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 175 and 179 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

Priority habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. List of priority habitats and species can be found here². Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value

of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found here.

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

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

We would not expect to provide further advice on the discharge of planning conditions or obligations attached to any planning permission. Should the proposal change, please consult us again.

Annex A – Additional Advice

Natural England offers the following additional advice:

Landscape

Paragraph 174 of the National Planning Policy Framework (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the Landscape Institute Guidelines for Landscape and Visual Impact Assessment for further guidance.

Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 174 and 175). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in GOV.UK guidance. Agricultural Land Classification information is available on the Magic website on the Data.Gov.uk website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

Guidance on soil protection is available in the Defra *Construction Code of Practice for the Sustainable Use of Soils on Construction Sites*, and we recommend its use in the design and construction of development, including any planning conditions. For mineral working and landfilling separate guidance on soil protection for site restoration and aftercare is available

on [Gov.uk](https://www.gov.uk) website. Detailed guidance on soil handling for mineral sites is contained in the Institute of Quarrying [Good Practice Guide for Handling Soils in Mineral Workings](#).

Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Protected Species

Natural England has produced [standing advice](#)³ to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Ancient woodland, ancient and veteran trees

You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 180 of the NPPF. Natural England maintains the [Ancient Woodland Inventory](#) which can help identify ancient woodland. Natural England and the Forestry Commission have produced [standing advice](#) for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Environmental gains

Development should provide net gains for biodiversity in line with the NPPF paragraphs 174(d), 179 and 180. Development also provides opportunities to secure wider environmental gains, as outlined in the NPPF (paragraphs 8, 73, 104, 120, 174, 175 and 180). We advise you to follow the mitigation hierarchy as set out in paragraph 180 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you should consider off site measures. Opportunities for enhancement might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding a green roof to new buildings.

Natural England's [Biodiversity Metric 3.1](#) may be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. For small development sites the [Small Sites Metric](#) may be used. This is a simplified version of [Biodiversity Metric 3.1](#) and is designed for use where certain criteria are met. It is available as a beta test version.

You could also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, Green Infrastructure or Biodiversity Strategy in place in your area. For example:

- Links to existing greenspace and/or opportunities to enhance and improve access.
- Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips)
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside [Biodiversity Metric 3.1](#) and is available as a beta test version.

Access and Recreation

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

Rights of Way, Access land, Coastal access and National Trails

Paragraphs 100 and 174 of the NPPF highlight the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on the any nearby National Trails. The National Trails website www.nationaltrail.co.uk provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts.

Biodiversity duty

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

Natural England – 13 January 2023

Thank you for your consultation.

Natural England has previously commented on this proposal and made comments to the authority in our response dated 01 September 2022. Reference number **404322**.

The advice provided in our previous response applies equally to this **amendment** The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal.

Should the proposal be amended in a way which **significantly** affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us the amended consultation, please assess whether the changes proposed will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us.

Parish Council – 16 August 2022

Comment Reasons:

Comment: The Parish Council have noted the application and will supply full comments and its position at a later date. This will include possible section 106 mitigations should Buckinghamshire Council be minded to approve the application.

Comment Reasons: Comment: At this stage, I am not ready to provide a stance yet, but I would like to note a few important things.

1. The mitigations mentioned in the application, especially the Seven Bells Hill road improvements, should have exact dates when they will be started and finished and those dates should be as soon as possible. This will assuage local fears that these mitigations won't happen. Planning enforcement should get involved if the mitigations do not get started on time.

2. The buildings planned are not in keeping with the character of the local area, even for commercial buildings, and due to their height and closeness to Black Park, should be reconsidered. Every local plan created in the local area says new buildings should be in line with local character.

3. Ivy and/or other types of living walls should be on the side of studio buildings and multi-storey car parks to

- a. mitigate the destruction of the openness of the Green Belt
- b. improve biodiversity
- c. improve energy efficiency, lowering the carbon footprint of new buildings while saving Pinewood Studios money

According to multiple studies, ivy can make walls 3oC warmer in winter and 3oC cooler in summer while mitigating pollution as well. It is greatly underestimated in its effect and is very quick and easy to install.

4. The objectives of the application should be balanced with the requirements of Green Belt law, the strain on local roads and the requirements for new housing that a large commercial development would have on the Green Belt. There could be a fair compromise in which not all studios would be built, but enough for Pinewood Studios to reach some of their legitimate commercial goals.

Highways & Technical Services (Strategic Access) – 29 November 2022

PART A - Alderbourne Farm

The Biodiversity and Green Infrastructure paper indicates with stock photos an aspiration to provide off-road walking and cycling in woodland or wetland settings along wide surfaced tracks [Extracts 1 and 2].



Extract 1 – from *Biodiversity and Green Infrastructure paper*.



Extract 2 – from *Biodiversity and Green Infrastructure paper*.

The Alderbourne Farm opportunities plan [p. 8] indicates gravel footpaths. The stock photo on p.9 indicates an aspirational surfaced route with good width [Extract 3].



Extract 3 – from *Biodiversity and Green Infrastructure paper* [p.9].

The delivery arrangements for the nature reserve are included within the agent's response to the CVRP comments, copied below:

3.11 The arrangements for the nature reserve are still in preparation but the principles are being shared with interested parties and those responding to requests from the applicant to join the discussion/consultation events where such matters could be raised.

3.12 The proposed organisational and delivery structure is a creation of a charitable land trust with broad community and representative body membership to accept the

ownership of the site and deliver the reserve with assured funding from Pinewood Studios.

3.13 The requirements of the trust would be to:

- Maintain and manage the reserve primarily for nature conservation with passive public access/recreation
- Deliver the proposed BNG
- Operate in an inclusive way with community involvement

3.14 These requirements are to be included in a S106 agreement between the applicant and Buckinghamshire Council with input from local groups/bodies/representatives. Work on a constitution is taking place.

3.15 The precise layout and use of the reserve would be the responsibility of the trust within the legal requirements of their originating deed as proposed by Pinewood Studios and enshrined in any planning permission.

3.16 The concerns of the CVRP are therefore misconceived. The comments on the detailed layout are premature. The 'requirements' of the CVRP as listed on page 3 of the objections are not.

Notwithstanding para 3.15 and 3.16 with respect to layout, the outline extent of the permissive paths are illustrated in the Landscape Plan [Extract 4]. Details to be agreed later



Extract 4 – from Landscape Plan

Granting wider pedestrian access that connects to the existing rights of way and permissive path network is a clear benefit of the application. The routes appear largely recreational in nature, thus complimenting the access element of wider green infrastructure networks.

In note para 3.16 stating detailed layouts are premature, but hopefully the following is helpful.

With reference to the Green Infrastructure Plan [Extract 5] it would be useful if the route I annotate orange and label 1, connected more directly to Black Park's bridleway network, for continuous off-road access. At present route 1 ends north of 1-4 Springfield Cottages, returning users to make the 133m connection to Black Park along the road. Ideally, this would emerge at the junction of Alderbourne Lane and Fulmer Common Road, with a connection onto the bridleway in Black Park [blue dots on Extract 5]. There may be a good reason why the route cannot pass to the north and east of 1-4 Springfield Cottages, partly utilising the Alderbourne Farm access track, but it would remove walkers off the road and provide a safer alternative.

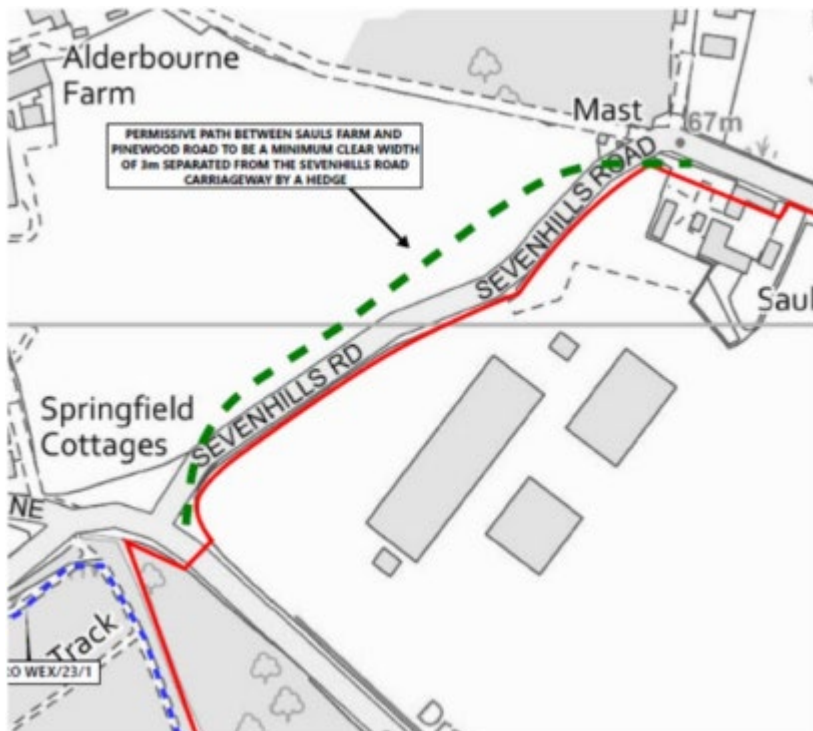


Extract 5 – from *Green Infrastructure Plan*

My route 2 [Extract 5] connects with the frontage of Field Lodge opposite Saul's Farm on Seven Hills Road and the wider permissive path network provided by Pinewood. This is east of point B on Extract 4 and shown more widely by the permissive footpaths secured through the Pinewood east s106 Agreement, illustrated on Extract 6, with a later amendment on Extract 7. This is welcome.



Extract 6 –PSDF Public Access Routes Plan [from a previous application - iTransport ITL16184]



Extract 7 –PSDF Public Access Routes Plan [from a previous application]

The routes highlighted orange in Extract 5 would seem to benefit from being shared footpaths and cycleways rather than walking routes only, allowing users off-road choices that avoid parts of Seven Hills Road and Alderbourne Lane, should they wish to do so. Illustrative photos [Extract 2 above] indicate the intention to include cyclists, but it would be helpful to clarify.

Even though the car park may have restricted opening times, it would improve the local amenity to allow walkers and cyclists temporal access that goes some way near to or matching, and thus complementing, the 24/7 access secured in previous s.106 Agreements [Extracts 6 & 7].

Para 3.11 - 3.16 above indicates details are still emerging on access, but you may wish to seek some control of the permissive arrangements by securing walking and cycling access routes and opening times within the s106 Agreement.

PART B - Pinewood South

Peace Path

This route is within the control of the applicant. It is situated between the existing Pinewood Road cycleway and the bridleways and permissive cycling network within Black Park. The screen industries global growth hub application [PL/20/3280/OA] proposed removing this route, so retaining it is very welcome. It provides an important east to west connection for non-motorised users, albeit with restricted opening times.

Nevertheless, I would suggest the existing permission is upgraded to allow cycling. This would improve route choices, potentially reducing recreational car trips from Iver Heath to Black Park, which in turn boosts health and well-being. It would also benefit cycle trips to the northern area of Iver Heath from communities within Wexham, Wexham Street, George Green and Slough, benefitting local residents impacted by the development.

In order to facilitate walking and cycling to Black Park, I'd recommend a 3m-wide surface improvement to the Peace Path, such as bitumen or KBI Flexipave [with a lower carbon footprint]. A wider path would also improve the feel and confidence for walkers, with the existing corridor flanked closely by high security fences.

I note the agent's reply to the CVRP response states there is no intention to resurface the Peace Path, but in light of the absence of cycling facilities along the Uxbridge Road [A412] and intimidating on-road conditions for cyclists west of Five Points Roundabout, any improvements for cyclists travelling in an east to west direction should be encouraged.

Supporting Policy

CP7 - South Bucks District Council Core Strategy Policy

Targets the 'Number of measures completed that improve transport choice and provide a safe and attractive environment for pedestrians and cyclists'.

Para 104[c] NPPF 2021

'Opportunities to promote walking, cycling and public transport use are identified and pursued'.

Para 100 NPPF 2021

'Protect and enhance public rights of way and access by...taking opportunities to provide better facilities for users'...and by... 'adding links to existing rights of way'.

Local Transport Plan 4

Policy 12 and 23 encourage walking and cycling.

Buckinghamshire Rights of Way improvement Plan 2020 – 2030

Aims to improve a fragmented bridleway network.

Other strategies

Colne and Crane Valleys Green Infrastructure Plan 2020

Focuses on 'improved pedestrian and cycling accessibility' and 'boosting health and well-being'.

Active Travel In The Ivers Parish [Iver Parish Council]

Supports expanding the walking and cycling network and identifies 'key route' improvements for non-motorised users.

Strategic Access – Highways & Technical Services – 22 December 2022

Thank you for your letter of 21st December 2022 with regard to:

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

I have no further comments from a rights of way perspective.

Strategic Environmental Protection Team – 11 October 2022

Air Quality Comments

Thank you for consulting us on the proposed development outlined above. I have no comments to make with regards to air quality.

There are concerns about the potential air quality impacts of cumulative developments in the Ivers as many individual schemes, deemed insignificant in themselves, are potentially contributing to a "creeping baseline". There is a concern that in combination the emissions of local planning developments and the National Infrastructure Projects could result in a significant increase in NO₂ concentrations in Iver and also contribute towards an increase in particulate matter. The Air Quality Action Plan for the Iver contains a number of measures that should reduce NO₂ concentrations in Iver Parish. The council are requesting a financial contribution from all developments that increase concentrations within the Iver area regardless of magnitude to offset the increase and prevent baseline creep.

A condition requesting a Construction Environmental Management Plan (CEMP) as recommended in paragraph 11.10. This CEMP will be informed by the assessment completed in Appendix 11.2 and follows the IAQM demolition and construction guidance to determine the mitigation measures required. As recommended in paragraph 11.12 the appropriate emission standards for NRMM taken from EU Regulation 2016/1628xxi will be incorporated into the CEMP.

This memo only includes comments relating to air quality. No other environmental health matters are covered. Where relevant, these comments will be provided separately.

Lead Local Flood Authority– 31 August 2022

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

- Pinewood South Flood Risk Assessment and Drainage Strategy (May 2022, Civic Engineers)
- Alderbourne Farm Flood Risk Assessment and Drainage Strategy (May 2022, Civic Engineers)

The LLFA requests further information prior to the determination of the above proposals.

As described in the proposal above, the planning application covers two separate locations, Pinewood South and Alderbourne Farm which are accompanied by two separate site-specific flood risk assessments (FRA). Therefore for ease of reference, these areas will be assessed in turn.

Pinewood South

Surface water flood risk

The FRA provides an extract of the Risk of Flooding from Surface Water which indicates that parts of the site lie in an area of high risk of surface water flooding (meaning there is a greater than 3.3% likelihood of flooding occurring in a given year. The site is a former quarry with some areas of remediation ongoing as detailed in section 2.3.1 of the FRA. In addition, some areas to the north of the site have been restored to greenfield. The FRA (4.7.7) suggests that the surface water flooding identified on the national mapping is due to the historic land use and low spots within the site. In order to further investigate this, the FRA refers to an Overland Flow Simulation/ Long-Term Flood Risk Comparison Plan (drawing no. 1278-01-XX-XX-SK-D-1001-P01) which was produced using topographical data to show the changes in site levels and surface water flow pathways. The FRA states that Drawing no. 1278-01-XX-XX-SK-D-1001-P01 indicates the absence of off-site flow routes passing through the site area. However, the Overland Flow Simulation/ Long-Term Flood Risk Comparison Plan (drawing no. 1278-01-XX-XX-SK-D-1001-P01) has not been included for review under this proposal. I request that the FRA is updated to include all referred to plans and drawings.

Groundwater flood risk

The Groundwater Flood Map (Jeremy Benn Associates, 2016), shows the groundwater level in the area of the proposed development to be at between 0.5m and 5m of the ground surface for a 1 in 100 year return period. This means that there is a risk of flooding to subsurface assets but surface manifestation of groundwater is unlikely. The FRA (4.4.2) states that water level recorded in the boreholes on the site showed a groundwater level of between 3m and 4m below ground level. The ground investigations report has not been provided for review under this proposal. I request that the FRA is updated to include the

ground investigations report. Please note, that further investigations, such as groundwater monitoring should take place prior to detailed design.

Surface Water Drainage

The FRA does not examine the different methods of surface water disposal set out in the drainage hierarchy, instead the FRA sets out that surface water runoff will be discharge via four surface water outfalls to a watercourse at a rate of 1.7l/s/ha (equivalent of 54l/s for the total site area). The FRA should be amended to include commentary on the infiltration potential for the site and set out that infiltration rate testing in accordance with BRE 365 should be conducted prior to a detailed surface water drainage strategy design.

The FRA refers to an Existing Catchment Plan (drawing no. 1278.01-CIV-XX-XX-DR-D-1001-P01) which shows five catchments within the existing site. This plan is supposed to be contained within Appendix C but it does not appear to have been included. Catchments are referenced within the Proposed Surface Water Drainage Layout (drawing no. 1278.01-CIV-XX-XX-D-C-30001-P02) but it is not clear if these align to the five existing drainage catchments referenced above.

The FRA (5.3.2) sets out that it is intended to use four sub-catchment outfalls to manage surface water runoff from the site and discharge to nearby watercourses. This is in line with the drainage hierarchy subject to infiltration as a means of surface water disposal being demonstrated to be unviable at detailed design stage following infiltration rate testing in accordance with BRE 365 and groundwater monitoring. It is noted that due to site topography, it may be necessary for surface water flows to be pumped to the point of outfall. I wish to remind the applicant that the Nonstatutory technical standards for SuDS (Defra, 2015) advises that pumping should only be used to facilitate drainage for those parts of the site where it is not reasonably practicable to drain water by gravity.

The National Planning Policy Framework (Para. 167) requires that planning applications demonstrate that any residual risk (such as pump failure) can be safely managed. At detailed design, technical details on pump maintenance and details of exceedance routes in the event of failure, blockage or a rainfall event that exceeds the provided storage must be provided. In addition, I request that sufficient storage is provided and an inclusion of a warning system in the event of a pump failure. We will also require a maintenance plan for the pumping station.

It is proposed to attenuate up to the 1 in 100 year storm event plus 40% climate change allowance. Indicative storage requirements for the four catchments are set out in Table 4. From the figures provided in Table 4, it is noted that the total storage available through the provision of attenuation storage and permeable paving exceeds the required storage volumes by 765m³. Please note, that new climate change allowances for rainfall intensity were published in May 2022, for development with a lifetime beyond 2100, flood risk assessment should assess the upper end allowances for both the 1% and 3.3% AEP for the 2070s epoch (2061 to 2125). Applicants should design their proposals for the 1% AEP event so that there is no increase in flood risk elsewhere and that the development is safe from

surface water flooding. In light of this guidance, calculations must be submitted for the 3.3% AEP with an allowance for climate change.

Attenuation will provide in strategic swales/basins/ponds and permeable paving across the site as shown on the Proposed Surface Water Drainage Layout (drawing no. 1278.01-CIV-XX-XX-D-C-30001- P02). I have concerns with the proposed design parameters of the swales and basins. The majority of the proposed swales across the Pinewood South site, have proposed side slopes of 1:2 and design depths of 1.5 to 1.7m. In line with best practice guidance, the maximum side slopes must be 1 in 3, however, 1 in 5 slopes are preferred for maintenance access. In addition, a swale depth of greater than 1m is not acceptable. Therefore, revisions are required to the Proposed Surface Water Drainage Layout (drawing no. 1278.01-CIV-XX-XX-D-C-30001-P02). Similarly, basin side slopes of 1 in 2 are not acceptable and again should be amended to have a maximum side slope of 1 in 3, with 1 in 5 slopes in areas for maintenance access. The maximum depth of water for basins should not normally exceed 2m in the most extreme design event. I advise that the overall design of the basin should be natural in shape, with topography and vegetation that reflect the landscape and enhance the character of the area. Therefore, revisions are required to the Proposed Surface Water Drainage Layout (drawing no. 1278.01-CIV-XX-XX-D-C-30001-P02).

There is an opportunity to incorporate further source control SuDS, such as green roofs and green walls, along with small scale SuDS with the proposed parking areas, these include rain gardens and bio-retention areas. Source control SuDS can assist in diversifying the landscape and introducing additional green-blue infrastructure within the site. I would encourage for further opportunities for SuDS to be investigated at this stage.

Alderbourne Farm

Surface Water Flood Risk

The Flood Map for Surface Water (FMfSW) provided by the Environment Agency shows that the eastern central area is at high risk of surface water flooding (meaning there is greater than 3.3% likelihood of flooding occurring in a given year). For the medium water flooding event the extent of the flooding extends west further into the site and during a low risk surface water flood event surface water flooding is shown to extend across the whole of the centre of the site. The surface water flooding is associated with the Alderbourne, a Main River, which flows through the centre of the site, west to east. An online version of this mapping data is available to view through the Environment Agency's Long term flood risk information mapping.

Groundwater Flood Risk

The Groundwater Flood Map (Jeremy Benn Associates, 2016) shows the groundwater level in the area of the proposed development to be at within 5m of the ground surface for a 1 in 100 year return period. This means that flooding from groundwater is not likely.

Main River and Fluvial Flood Risk

Whilst not within the remit of the LLFA, we would like to highlight that due to the presence of the Alderbourne the central section of the proposed nature reserve is within Flood Zone 2 and 3.

It should be noted that watercourse mapping identifies a section of the Alderbourne as culverted, however, during a site visit a culvert could not be located. The Topographic Survey (LT/222/0013/P/0001, 04/05/2022, Warner Surveys) does not extend as far as the Alderbourne and therefore it is not clear if there is a culvert located onsite. The LLFA require confirmation of if there is a culvert present. In the event of a culvert, the LLFA strongly recommend that it is opened. This may require an Environmental Permit from the Environment Agency; further information can be found in the informative at the end of this letter.

Additional Comments on Flood Risk

As described above the central area of the site is at risk of surface water and fluvial flooding, however it should be noted that no development is proposed in this area, instead this area has been proposed as a nature reserve.

Surface Water Drainage

Surface water runoff generated by the proposed backlot area will be discharged into an ordinary watercourse which flows into the Alderbourne at the greenfield runoff rate of 8.73l/s. It should be noted that to make a connection to this watercourse, consent may be required from the LLFA, further details are provided in an informative below.

The Planning Practice Guidance (Paragraph 080) outlines a drainage hierarchy from which applicants should aim to discharge surface runoff as high up the hierarchy as reasonably practicable:

- into the ground (infiltration);
- to a surface water body;
- to a surface water sewer, highway drain, or another drainage system;
- to a combined sewer.

It has been stated that infiltration may not be viable in some areas of the site due to previous land use, however there may be areas that can infiltrate. To provide evidence that the drainage hierarchy has been followed infiltration rate testing must be completed in accordance with BRE365. Tests must be completed a minimum of three times and water should drain until nearly empty. The time taken for the trial pit to drain from 75% full to 25% full is then used to calculate the infiltration rate. The worst calculated rate from the three tests is then used to inform the storage calculations. If testing demonstrates that infiltration is viable, the surface water drainage scheme must be updated to incorporate infiltration.

It is proposed to store surface water runoff generated by the backlot in a large pond to the north of the backlot, whilst the proposal meets the four pillars of SuDS, water quality, water quantity, amenity and biodiversity the LLFA are disappointed with a 'pipe to pond' solution. The Proposed Surface Water Drainage Strategy (1278-03-CIV-XX-XX-D-C-30001 Revision P02, 07/07/2022, Civic Engineers) shows embankments proposed around the pond, an indicative cross section of the pond is required to provide details of the height of the proposed embankments.

The surface water drainage scheme should be designed to be more sympathetic to the proposed nature reserve, this could be done by incorporating a smaller ponds and wetlands. Incorporating a 'cascade' of wetlands and ponds would provide a range of habitats. The incorporating of smaller wetlands and ponds would also remove the need for a large embankments.

The Proposed Surface Water Drainage Strategy shows car parking areas within the Backlot, as a minimum the LLFA would expect the car parking spaces to be constructed with permeable materials, this would provide additional water quality treatment as well as storage. In areas where infiltration is not viable tanked permeable paving can be utilised.

Calculations are required which demonstrate that the proposed drainage system can contain up to the 1 in 30 storm event without flooding. Any onsite flooding between the 1 in 30 and the 1 in 100 plus 40% climate change storm event should be safely contained on site. These calculations must include details of critical storm durations and demonstrate how the proposed system as a whole will function during different storm events. If any flooding occurs for the 1 in 100 year plus 40% climate change event, then we require details of where this flooding will occur and the volume of the flooding.

A maintenance schedule for the surface water drainage system needs to be provided. It should include the maintenance tasks which are required, the persons responsible for undertaking maintenance and frequency by which these will be undertaken.

Advice to LPA

If you are minded to approve the application contrary to this advice, we request that you contact us to allow further discussion and/or representations from us.

Informatives

Connection to Ordinary Watercourse

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

Works on Main Rivers

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

Lead Local Flood Authority – 10 November 2022

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

- Technical Note – LLFA Response (ref. 1278-01/03, Civic Engineers)
- Pinewood South Flood Risk Assessment and Drainage Strategy (September 2022, Civic Engineers)
- Alderbourne Farm Flood Risk Assessment and Drainage Strategy (September 2022, Civic Engineers)

The LLFA requests further information prior to the determination of the above proposals.

As described in the proposal above, the planning application covers two separate locations, Pinewood South and Alderbourne Farm which are accompanied by two separate site-specific flood risk assessments (FRA). For ease of reference, these areas will be assessed in turn.

Pinewood South

Surface water flood risk

The FRA provides an extract of the Risk of Flooding from Surface Water which indicates that parts of the site lie in an area of high risk of surface water flooding (meaning there is a greater than 3.3% likelihood of flooding occurring in a given year. The site is a former quarry with some areas of remediation ongoing as detailed in section 2.3.1 of the FRA. In addition, some areas to the north of the site have been restored to greenfield. The FRA (4.7.7) suggests that the surface water flooding identified on the national mapping is due to the historic land use and low spots within the site. In order to further investigate this, the FRA refers to an Overland Flow Simulation/ Long-Term Flood Risk Comparison Plan (drawing no. 1278-01-XX-XX-SK-D-1001-P01) which was produced using topographical data to show the changes in site levels and surface water flow pathways. The FRA states that Drawing no. 1278-01-XX-XX-SK-D-1001-P01 indicates the absence of off-site flow routes passing through the site area. The Overland Flow Simulation/ Long-Term Flood Risk Comparison Plan (drawing no. 1278-01-XX-XX-SK-D-1001-P01) has been included in the appendices but due to formatting is not viewable. I request that the FRA is updated to include an updated version of the drawing.

Groundwater flood risk

The Groundwater Flood Map (Jeremy Benn Associates, 2016), shows the groundwater level in the area of the proposed development to be at between 0.5m and 5m of the ground surface for a 1 in 100 year return period. This means that there is a risk of flooding to subsurface assets but surface manifestation of groundwater is unlikely. The FRA (4.4.2) states that water level recorded in the boreholes on the site showed a groundwater level of between 3m and 4m below ground level. The FRA has been updated to include four borehole logs from British Geology Survey records, to evidence the conclusions made around the groundwater levels. Please note, that further investigations, such as groundwater monitoring should take place prior to detailed design.

Surface Water Drainage

The FRA does not examine the different methods of surface water disposal set out in the drainage hierarchy, instead the FRA sets out that surface water runoff will be discharge via four surface water outfalls to a watercourse at a rate of 1.7l/s/ha (equivalent of 54l/s for the total site area).

The FRA refers to an Existing Catchment Plan (drawing no. 1278.01-CIV-XX-XX-DR-D-1001-P01) which shows five catchments within the existing site. This plan has been included in the appendices but due to formatting is not viewable. I request that the FRA is updated to include an updated version of the plan. Catchments are referenced within the Proposed Surface Water Drainage Layout (drawing no. 1278.01-CIV-XX-XX-D-C-30001-P02) but it is not clear if these align to the five existing drainage catchments referenced above.

The FRA (5.3.2) sets out that it is intended to use four sub-catchment outfalls to manage surface water runoff from the site and discharge to nearby watercourses. This is in line with the drainage hierarchy subject to infiltration as a means of surface water disposal being demonstrated to be unviable at detailed design stage following infiltration rate testing in accordance with BRE 365 and groundwater monitoring. It is noted that due to site topography, it may be necessary for surface water flows to be pumped to the point of outfall. I wish to remind the applicant that the Nonstatutory technical standards for SuDS (Defra, 2015) advises that pumping should only be used to facilitate drainage for those parts of the site where it is not reasonably practicable to drain water by gravity.

The National Planning Policy Framework (Para. 167) requires that planning applications demonstrate that any residual risk (such as pump failure) can be safely managed. At detailed design, technical details on pump maintenance and details of exceedance routes in the event of failure, blockage or a rainfall event that exceeds the provided storage must be provided. In addition, I request that sufficient storage is provided and an inclusion of a warning system in the event of a pump failure. We will also require a maintenance plan for the pumping station. The above requirements have been included within the FRA (5.8.8).

It is proposed to attenuate up to the 1 in 100 year storm event plus 40% climate change allowance. Indicative storage requirements for the four catchments are set out in Table 4. From the figures provided in Table 4, it is noted that the total storage available through the provision of attenuation storage and permeable paving exceeds the required storage volumes by 765m³. Please note, that new climate change allowances for rainfall intensity were published in May 2022, for development with a lifetime beyond 2100, flood risk assessment should assess the upper end allowances for both the 1% and 3.3% AEP for the 2070s epoch (2061 to 2125). Applicants should design their proposals for the 1% AEP event so that there is no increase in flood risk elsewhere and that the development is safe from surface water flooding. In light of this guidance, calculations must be submitted for the 3.3% AEP with an allowance for climate change. The technical note suggests that these calculations are contained in Appendix D but they appear to have been omitted.

Attenuation will be provided in strategic swales/basins/ponds and permeable paving across the site as shown on the Proposed Surface Water Drainage Layout (drawing no. 1278.01-CIV-XX-XX-D-C30001-P02). I have concerns with the proposed design parameters of the swales and basins. The majority of the proposed swales across the Pinewood South site, have proposed side slopes of 1:2 and design depths of 1.5 to 1.7m. In line with best practice

guidance, the maximum side slopes must be 1 in 3, however, 1 in 5 slopes are preferred for maintenance access. In addition, a swale depth of greater than 1m is not acceptable.

The technical note refers to health and safety guidance within the CIRIA SuDS Manual to mitigate the design of the swales at detailed design. I wish to remind the applicant that as per the CIRIA SuDS Manual, 'Competent, best practice SuDS design should mean that health and safety risks are considered throughout the design process. The results should be that risks are reduced to acceptable levels by designing out hazards'. The FRA does not contain suitable justification to support the suggest design parameters of the swales. The outline planning applications provides the opportunity to establish acceptable design parameters for SuDS features in line with best practice and therefore, I require the Proposed Surface Water Drainage Layout (drawing no. 1278.01-CIV-XX-XX-D-C-30001- P02) to be amended in line with the CIRIA SuDS Manual. I advise that the overall design of the swales and basins should be natural in shape, with topography and vegetation that reflect the landscape and enhance the character of the area.

There is an opportunity to incorporate further source control SuDS, such as green roofs and green walls, along with small scale SuDS with the proposed parking areas, these include rain gardens and bio-retention areas. Source control SuDS can assist in diversifying the landscape and introducing additional green-blue infrastructure within the site. I would encourage for further opportunities for SuDS to be investigated at this stage.

Alderbourne Farm

Surface Water Flood Risk

The Flood Map for Surface Water (FMfSW) provided by the Environment Agency shows that the eastern central area is at high risk of surface water flooding (meaning there is greater than 3.3% likelihood of flooding occurring in a given year). For the medium water flooding event the extent of the flooding extends west further into the site and during a low risk surface water flood event surface water flooding is shown to extend across the whole of the centre of the site. The surface water flooding is associated with the Alderbourne, a Main River, which flows through the centre of the site, west to east. An online version of this mapping data is available to view through the Environment Agency's [Long term flood risk information](#) mapping.

Groundwater Flood Risk

The Groundwater Flood Map (Jeremy Benn Associates, 2016) shows the groundwater level in the area of the proposed development to be at within 5m of the ground surface for a 1 in 100 year return period. This means that flooding from groundwater is not likely.

Main River and Fluvial Flood Risk

Whilst not within the remit of the LLFA, we would like to highlight that due to the presence of the Alderbourne the central section of the proposed nature reserve is within Flood Zone 2 and 3.

Additional Comments on Flood Risk

As described above the central area of the site is at risk of surface water and fluvial flooding, however it should be noted that no development is proposed in this area, instead this area has been proposed as a nature reserve.

Surface Water Drainage

Surface water runoff generated by the proposed backlot area will be discharged into an ordinary watercourse which flows into the Alderbourne at the greenfield runoff rate of 8.73l/s. It should be noted that to make a connection to this watercourse, consent may be required from the LLFA, further details are provided in an informative below.

It is proposed to convey surface water runoff generated by the backlot using filter drains (where possible) to a large pond to the north of the backlot. Whilst the proposal meets the four pillars of SuDS, water quality, water quantity, amenity and biodiversity the LLFA are disappointed with the 'pipe to pond' solution as it does not integrate blue-green corridors throughout the site. The Proposed Surface Water Drainage Strategy (1278-03-CIV-XX-XX-D-C-30001 Revision P02, 07/07/2022, Civic Engineers) shows embankments proposed around the pond, an indicative cross section of the pond has been provided in Figure 7 to demonstrate the proposed height of the embankment, which is approximately 2.2m. In its current form, the pond will hold 4380m³ above ground level and so there is a concern regarding the possible flood risk should the embankment be breached as no details of an overflow mechanism have been provided. Therefore, I wish to reiterate the previous comments around the required attenuation basin being provided in a number of smaller ponds both wet and dry.

The Proposed Surface Water Drainage Strategy shows car parking areas within the Backlot, as a minimum the LLFA would expect the car parking spaces to be constructed with permeable materials, this would provide additional water quality treatment as well as storage. In areas where infiltration is not viable tanked permeable paving can be utilised.

The Technical Note states that calculations have been provided for the 3.3% AEP plus climate change event within Appendix D. Having reviewed Appendix D, this scenario does not appear to have been included. I request that Appendix D is updated to include this information.

An indicative maintenance schedule for the surface water drainage system has been provided in the FRA 5.10, this will need to be updated should the surface water drainage scheme be amended with additional SuDS features.

Connection to Ordinary Watercourse

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

Works on Main Rivers

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

Lead Local Flood Authority – 16 December 2022

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

- Technical Note – LLFA Response (ref. 1278-01/03, Civic Engineers)
- Pinewood South Flood Risk Assessment and Drainage Strategy (December 2022, Civic Engineers)
- Alderbourne Farm Flood Risk Assessment and Drainage Strategy (December 2022, Civic Engineers)

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

As described in the proposal above, the planning application covers two separate locations, Pinewood South and Alderbourne Farm which are accompanied by two separate site-specific flood risk assessments (FRA). For ease of reference, these areas will be assessed in turn.

Pinewood South

Surface water flood risk

The FRA provides an extract of the Risk of Flooding from Surface Water which indicates that parts of the site lie in an area of high risk of surface water flooding (meaning there is a greater than 3.3% likelihood of flooding occurring in a given year. The site is a former quarry with some areas of remediation ongoing as detailed in section 2.3.1 of the FRA. In addition, some areas to the north of the site have been restored to greenfield. The FRA (4.7.7) suggests that the surface water flooding identified on the national mapping is due to the historic land use and low spots within the site. In order to further investigate this, the FRA refers to an Overland Flow Simulation/ Long-Term Flood Risk Comparison Plan (drawing no. 1278-01-XX-XX-SK-D-1001-P01) which was produced using topographical data to show the changes in site levels and surface water flow pathways. The Overland Flow Simulation / Long-term Flood Risk Comparison shows that there has been a local change in topography which as a result has altered the surface water pathways. The drawing also indicates the absence of off-site flow routes passing through the site area. The exercise does highlight the presence of a ditch network in the northern catchment which bisects the site west to east.

Groundwater flood risk

The Groundwater Flood Map (Jeremy Benn Associates, 2016), shows the groundwater level in the area of the proposed development to be at between 0.5m and 5m of the ground surface for a 1 in 100 year return period. This means that there is a risk of flooding to

subsurface assets but surface manifestation of groundwater is unlikely. The FRA (4.4.2) states that water level recorded in the boreholes on the site showed a groundwater level of between 3m and 4m below ground level. The FRA has been updated to include four borehole logs from British Geology Survey records, to evidence the conclusions made around the groundwater levels. Please note, that further investigations, such as groundwater monitoring should take place prior to detailed design.

Surface Water Drainage

The FRA does not examine the different methods of surface water disposal set out in the drainage hierarchy, instead the FRA sets out that surface water runoff will be discharge via four surface water outfalls to a watercourse at a rate of 1.7l/s/ha (equivalent of 54l/s for the total site area).

The FRA refers to an Existing Catchment Plan (drawing no. 1278.01-CIV-XX-XX-DR-D-1001-P01) which shows five catchments within the existing site. The FRA (5.3.2) sets out that it is intended to use four sub-catchment outfalls to manage surface water runoff from the site and discharge to nearby watercourses. This is in line with the drainage hierarchy subject to infiltration as a means of surface water disposal being demonstrated to be unviable at detailed design stage following infiltration rate testing in accordance with BRE 365 and groundwater monitoring. It is noted that due to site topography, it may be necessary for surface water flows to be pumped to the point of outfall. I wish to remind the applicant that the Non-statutory technical standards for SuDS (Defra, 2015) advises that pumping should only be used to facilitate drainage for those parts of the site where it is not reasonably practicable to drain water by gravity.

The National Planning Policy Framework (Para. 167) requires that planning applications demonstrate that any residual risk (such as pump failure) can be safely managed. At detailed design, technical details on pump maintenance and details of exceedance routes in the event of failure, blockage or a rainfall event that exceeds the provided storage must be provided. In addition, I request that sufficient storage is provided and an inclusion of a warning system in the event of a pump failure. We will also require a maintenance plan for the pumping station. The above requirements have been included within the FRA (5.8.8).

It is proposed to attenuate up to the 1 in 100 year storm event plus 40% climate change allowance. Indicative storage requirements for the four catchments are set out in Table 4. From the figures provided in Table 4, it is noted that the total storage available through the provision of attenuation storage and permeable paving exceeds the required storage volumes by 765m³. Please note, that new climate change allowances for rainfall intensity were published in May 2022, for development with a lifetime beyond 2100, flood risk assessment should assess the upper end allowances for both the 1% and 3.3% AEP for the 2070s epoch (2061 to 2125). Applicants should design their proposals for the 1% AEP event so that there is no increase in flood risk elsewhere and that the development is safe from surface water flooding. In light of this guidance, calculations must be submitted for the 3.3% AEP with an allowance for climate change. The technical note suggests that these calculations are contained in Appendix D but they appear to have been omitted. As the

drainage system will be attenuating surface water runoff up to the 1 in 100 year plus 40% allowance for climate change, this detail can be secured under a planning condition.

Following my previous consultation response, the FRA (5.4.11) has been amended to set out that where possible swales and will be designed to have a maximum depth of 1m and side slopes will be set at a gradient of 1 in 3. The detailed design will aim to create features that are more naturalistic in shape and the vegetation will reflect the landscape and enhance the character of the area. A note is also included on Drawing 1278-01-CIV-DR-30001-P02 30001 which mirrors the comments in 5.4.11 of the FRA.

There is an opportunity to incorporate further source control SuDS, such as green roofs and green walls, along with small scale SuDS with the proposed parking areas, these include rain gardens and bioretention areas. Source control SuDS can assist in diversifying the landscape and introducing additional green-blue infrastructure within the site.

Alderbourne Farm

Surface Water Flood Risk

The Flood Map for Surface Water (FMfSW) provided by the Environment Agency shows that the eastern central area is at high risk of surface water flooding (meaning there is greater than 3.3% likelihood of flooding occurring in a given year). For the medium water flooding event the extent of the flooding extends west further into the site and during a low risk surface water flood event surface water flooding is shown to extend across the whole of the centre of the site. The surface water flooding is associated with the Alderbourne, a Main River, which flows through the centre of the site, west to east. An online version of this mapping data is available to view through the Environment Agency's [Long term flood risk information](#) mapping.

Groundwater Flood Risk

The Groundwater Flood Map (Jeremy Benn Associates, 2016) shows the groundwater level in the area of the proposed development to be at within 5m of the ground surface for a 1 in 100 year return period. This means that flooding from groundwater is not likely.

Surface Water Drainage

Surface water runoff generated by the proposed backlot area will be discharged into an ordinary watercourse which flows into the Alderbourne at the greenfield runoff rate of 8.73l/s. It should be noted that to make a connection to this watercourse, consent may be required from the LLFA, further details are provided in an informative below.

It is proposed to convey surface water runoff generated by the backlot using filter drains (where possible) to a large pond to the north of the backlot. Following my previous consultation response, the FRA (5.4.11) has been amended to set out that at detailed design opportunities will be explored to enhance the strategy by including a series of smaller SuDS features across the site area in combination with, or in lieu of, a larger basin as currently shown on Drawing no. 1278-03-CIV-XX-XX-D-C-30001. In addition, blue-green corridors will be developed through the site and source control measures (such as permeable paving) will

be implement where possible. A note is also included on Drawing 1278-03- CIV-XX-XX-D-C-30001 which mirrors the comments in 5.4.11 of the FRA.

The Technical Note states that calculations have been provided for the 3.3% AEP plus climate change event within Appendix D. Having reviewed Appendix D, this scenario does not appear to have been included. As the drainage system will be attenuating surface water runoff up to the 1 in 100 year plus 40% allowance for climate change, this detail can be secured under a planning condition.

An indicative maintenance schedule for the surface water drainage system has been provided in the FRA 5.10, this will need to be updated should the surface water drainage scheme be amended with additional SuDS features.

I would request the following condition(s) be placed on the approval of the application, should this be granted by the LPA:

Pinewood South

Condition 1

Development shall not begin until a surface water drainage scheme for Pinewood South site, based on Pinewood South Flood Risk Assessment and Drainage Strategy (December 2022, Civic Engineers), has been submitted to and approved in writing by the Local Planning Authority. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed. The scheme shall also include:

- Assessment of SuDS components as listed in the CIRIA SuDS Manual (C753) and provide justification for exclusion if necessary
- Water quality assessment demonstrating that the total pollution mitigation index equals or exceeds the pollution hazard index; priority should be given to above ground SuDS components
- The discharge rate should be limited to 1.7l/s/ha
- Ground investigations including:
 - Infiltration in accordance with BRE365
 - Groundwater level monitoring over the winter period
- Where ground conditions permit, surface water drainage should be managed by infiltration-based SuDS.
- Where required, floatation calculations based on groundwater levels encountered during winter monitoring (November-March)
- SuDS components as set out in the FRA (5.4.11) and Drawing 1278-01-CIV-DR-30001-P02 30001
- Full construction details of all SuDS and drainage components
- Detailed drainage layout with pipe numbers, gradients and pipe sizes complete, together with storage volumes of all SuDS components
- Calculations to demonstrate that the proposed drainage system can contain up to the 1 in 30 storm event without flooding. Any onsite flooding between the 1 in 30 and the 1 in 100 plus climate change storm event should be safely contained on site.
- Details of proposed overland flood flow routes in the event of system exceedance or failure, with demonstration that such flows can be appropriately managed on site without increasing flood risk to occupants, or to adjacent or downstream sites.

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

Condition 2

Prior to occupation, a “whole-life” maintenance plan for the site must be submitted to and approved in writing by the Local Planning Authority. The plan shall set out how and when to maintain the full drainage system (e.g. a maintenance schedule for each drainage/SuDS component) during and following construction, with details of who is to be responsible for carrying out the maintenance. The plan shall subsequently be implemented in accordance with the approved details.

Reason: The reason for this being a pre-start condition is to ensure that maintenance arrangements have been arranged and agreed before any works commence on site that might otherwise be left unaccounted for.

NB: We would recommend that the “whole-life” maintenance and management plan for the surface water drainage system is secured by a Section 106 Planning Agreement. The use of a planning obligation (as opposed to a planning condition) would help to safeguard the maintenance and management of these features over the lifetime of the development. The BC Strategic Flood Management team are of the opinion that this is a reasonable approach due to the residual risk of surface water flooding to the site should the systems not be adequately maintained.

Alderbourne Farm

Condition 1

Development shall not begin until a surface water drainage scheme for Alderbourne Farm site, based on Alderbourne Farm Flood Risk Assessment and Drainage Strategy (December 2022, Civic Engineers), has been submitted to and approved in writing by the Local Planning Authority. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed. The scheme shall also include:

- Assessment of SuDS components as listed in the CIRIA SuDS Manual (C753) and provide justification for exclusion if necessary
- Water quality assessment demonstrating that the total pollution mitigation index equals or exceeds the pollution hazard index; priority should be given to above ground SuDS components
- The discharge rate should be limited to 8.73l/s
- Ground investigations including:
 - Infiltration in accordance with BRE365
 - Groundwater level monitoring over the winter period
- Where ground conditions permit, surface water drainage should be managed by infiltration-based SuDS.
- Where required, floatation calculations based on groundwater levels encountered during winter monitoring (November-March)

- SuDS components as set out in the FRA (5.4.11) and Drawing no. 1278-03-CIV-XX-XX-D-C-30001
- Full construction details of all SuDS and drainage components
- Detailed drainage layout with pipe numbers, gradients and pipe sizes complete, together with storage volumes of all SuDS components
- Calculations to demonstrate that the proposed drainage system can contain up to the 1 in 30 storm event without flooding. Any onsite flooding between the 1 in 30 and the 1 in 100 plus climate change storm event should be safely contained on site.
- Details of proposed overland flood flow routes in the event of system exceedance or failure, with demonstration that such flows can be appropriately managed on site without increasing flood risk to occupants, or to adjacent or downstream sites.

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

Condition 2

Prior to occupation, a “whole-life” maintenance plan for the site must be submitted to and approved in writing by the Local Planning Authority. The plan shall set out how and when to maintain the full drainage system (e.g. a maintenance schedule for each drainage/SuDS component) during and following construction, with details of who is to be responsible for carrying out the maintenance. The plan shall subsequently be implemented in accordance with the approved details.

Reason: The reason for this being a pre-start condition is to ensure that maintenance arrangements have been arranged and agreed before any works commence on site that might otherwise be left unaccounted for.

NB: We would recommend that the “whole-life” maintenance and management plan for the surface water drainage system is secured by a Section 106 Planning Agreement. The use of a planning obligation (as opposed to a planning condition) would help to safeguard the maintenance and management of these features over the lifetime of the development. The BC Strategic Flood Management team are of the opinion that this is a reasonable approach due to the residual risk of surface water flooding to the site should the systems not be adequately maintained.

Informative

Connection to Ordinary Watercourse

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

Thames Water – 30 August 2022

Waste Comments

With the information provided Thames Water has been unable to determine the waste water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for SURFACE WATER drainage, but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. "No development shall be occupied until confirmation has been provided that either:- 1. Surface water capacity exists off site to serve the development or 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Or 3. All Surface water network upgrades required to accommodate the additional flows from the development have been completed. Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

Following initial investigations, Thames Water has identified an inability of the existing FOUL WATER network infrastructure to accommodate the needs of this development proposal. Thames Water has contacted the developer in an attempt to agree a position for foul water networks but has been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. "The development shall not be occupied until confirmation has been provided that either:- 1. All foul water network upgrades required to accommodate the additional flows from the development have been completed; or- 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan." Reason - Network reinforcement works are likely to be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

Water Comments

With regard to water supply, this comes within the area covered by the Affinity Water Company. For your information the address to write to is - Affinity Water Company The Hub, Tamblin Way, Hatfield, Herts, AL10 9EZ - Tel - 0845 782 3333.

Supplementary Comments

No documentation containing confirmed details of the proposed surface water drainage plan could be located on the Local Authority website. For Thames Water to determine whether the existing sewer network has sufficient spare capacity to receive the increased flows from the proposed development, a drainage strategy must be submitted detailing the surface water strategies. Details of any proposed connection points or alterations to the public system, including calculated discharge rates (pre and post development) must be included in the drainage strategy. If initial investigations conclude that the existing sewer network is unlikely to be able to support the demand anticipated from this development, it will be necessary for the developer to fund an Impact Study.

Surface Water requirement: In accordance with the Building Act 2000 clause H3.3. Positive connection to a public surface water will only be consented when it can be demonstrated that the hierarchy of disposal methods have been examined and proven to be impracticable. The disposal hierarchy being; - 1st Soakaways; 2nd Watercourses; 3rd Sewer

Thames Water – 31 October 2022

Waste Comments

Following initial investigations, Thames Water has identified an inability of the existing FOUL WATER network infrastructure to accommodate the needs of this development proposal. Thames Water has contacted the developer in an attempt to agree a position for foul water networks but has been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. "The development shall not be occupied until confirmation has been provided that either:- 1. All foul water network upgrades required to accommodate the additional flows from the development have been completed; or- 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan." Reason - Network reinforcement works are likely to be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

The application indicates that SURFACE WATER will NOT be discharged to the public network and as such Thames Water has no objection, however approval should be sought

from the Lead Local Flood Authority. Should the applicant subsequently seek a connection to discharge surface water into the public network in the future then we would consider this to be a material change to the proposal, which would require an amendment to the application at which point we would need to review our position.

Water Comments

With regard to water supply, this comes within the area covered by the Affinity Water Company. For your information the address to write to is - Affinity Water Company The Hub, Tamblin Way, Hatfield, Herts, AL10 9EZ - Tel - 0845 782 3333.

Thames Water – 29 December 2022

We write in response to the letter sent by Turley, on behalf of Pinewood Group Limited, on 17 November 2022 responding to the revised consultation response from Thames Water Utilities Limited (“TWUL”).

The letter encloses an opinion from Clyde & Co (“the Opinion”) advising that the planning condition sought by TWUL would be unreasonable to impose on any planning permission granted pursuant to the Planning Application and that an informative should instead be included. TWUL disagrees with that conclusion for the following reasons.

1. The case law position

- 1.1. The Opinion references a number of case law decisions as support for the conclusion reached. TWUL respectfully disagrees with the analysis put forward in respect of these cases¹. In particular:
- 1.2. *Appeal decision reference number APP/Q5300/W/21/3276466 dated 30 March 2022* – TWUL notes that this quote included within the Opinion does not appear to be included within the decision letter nor is this issue discussed as part of that letter and so TWUL is unable to comment further on the circumstances in which this comment was made. TWUL would highlight that it did not participate in the public inquiry and was therefore not given the opportunity to comment on the Inspector’s findings or put forward an explanation as to why the condition was necessary.
- 1.3. *Grampian Regional Council v Secretary of State for Scotland and City of Aberdeen District Council 1984 SC (HL) 58* – The decision confirms that there is a distinction between a positive condition attached to planning permission requiring an applicant to bring about some circumstance outside of their control and a negative condition that the development should not commence until such an event has occurred, in that only the latter was enforceable and that the reasonableness of such a condition must be considered in the circumstances of the case.
- 1.4. In TWUL’s view, this case is directly relevant to the condition sought in relation to the Planning Application in that the condition is negatively worded and the applicant has the ability to agree a development and infrastructure phasing plan with the Council in consultation with TWUL.

- 1.5. *Mouchell Superannuation Fund Trustees and another v Oxfordshire County Council [1992] 1 PLR 97* – The case involved a positively worded condition requiring all access to be taken from a specified road and for works to be carried out to improve access arrangements in respect of that road, which was not included within red line boundary of planning consent nor in control of the applicant. The condition was held to be unenforceable because the applicant could not require all incoming traffic to use that road, making compliance impossible, and secondly the condition regarding improvement was something outside of the applicant’s control and was positively worded so could not be a Grampian condition.
- 1.6. *Davenport and Davenport v Hammersmith and Fulham London Borough Council (1999) 78 P. & C.R. 421* – The case involved the enforceability of a planning condition requiring that: “No vehicles which have been left with or are in the control of the applicant shall be stored or parked in Tasso Road.” Tasso road was a public highway and was outside the application site. It was held that it was permissible to have granted consent subject to a condition which applied to land outside of the application site however, here the condition was found to be invalid because it was not a condition regulating the use of the relevant land and therefore could not be enforced.
-

1. TWUL has been unable to obtain a copy of appeal decision reference number APP/N3210/A/08/2064447 dated 15 July 2008 from the Planning Inspectorate website and so unable to comment further on this case. However, we note this Inspector’s decision pre-dated the Barratt case cited below

2. In TWUL’s view, the conditions imposed in both the Mouchell and Davenport cases are not comparable to TWUL’s proposed condition in relation to the Planning Application as (1) the proposed condition is not a positively worded condition and (2) the proposed condition does regulate the use of the relevant land in that it prevents occupation of the development until the condition has been satisfied. Accordingly, these two cases do not appear to be analogous to the position here

3. Section 106 of the Water Industry Act 1991 (“the WIA”)

3.1 Section 106 of the WIA provides a right to connect to an undertaker’s sewerage system.

3.2 *In the case of Barratt Homes Ltd v DWR Cymru Cyfyngedig (Welsh Water) [2009] 1 EGLR 55*, the developer sought to use section 106 to connect into an existing sewer at the point nearest its development. Between that point and the sewage treatment plant there was a section of the existing network that was restricted and it was agreed by all parties that it simply would not cope with the extra demands that the new development would place upon it.

3.3 Accordingly, the water undertaker sought to argue that the developer could be required to connect to a different section of the sewer which did not have a capacity issue.

However, the Court held that there was very little ability to require a connection to be made at a certain point and emphasised the role of the planning system in moderating the impact of the absolute right to connect given by the legislation. They emphasised that local planning authorities will often consult with water companies when dealing with planning applications and should, where appropriate, impose Grampian conditions preventing development from starting until an acceptable drainage scheme has been submitted:

“A responsible planning authority would normally refuse planning permission until satisfied that drainage requirements can be resolved to the satisfaction of the relevant authorities. If off-site works are required, it may impose a condition or require an agreement to ensure that they are carried out at the expense of the developer” (paragraph 47).

3.4 As such, it is not correct to say that the legal mechanism set out in section 106 of the WIA is intended to be distinct and separate from planning legislation and outside of the responsibility of a local planning authority when determining an application. It is not the case that TWUL can seek to do so outside of the planning process as the *Barratt Homes* case clearly illustrates and it is clear from that case that planning conditions will be essential where there is a need to control connection requests arising from new development, given TWUL’s limited ability to do within the confines of section 106 of the WIA.

3.5 Additionally, we would just note that in terms of the funding arrangements for the requisite upgrades, infrastructure charges are made for the additional demand that each new connection puts on the capacity of the water supply and sewerage systems; such charges will be collected at the point of connection.

4. The ‘six tests’ specified in paragraph 56 of the NPPF.

4.1. Paragraph 56 of the National Planning Policy Framework sets out that *“Planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects.”*

4.2. Having reviewed the proposed condition, TWUL remains of the view that each of these tests are satisfied:

4.2.1. *Necessary* - Whilst there is a separate statutory regime governing the provision of clean and foul water infrastructure, i.e. under the WIA, this Act does not impose conditions on developments to ensure the development does not adversely impact on the existing network capacity etc., with which all applicants are required to comply in all cases.

Similarly there is a separate regime governing highways issues under the Highways Act 1980 but, for example, it is entirely normal for a local planning

authority to impose planning conditions restricting occupation of a development until certain highway improvements have been carried out. The principle is no different here: it remains a function of the local planning authority to ensure that the development's impacts are adequately mitigated as part of the planning process and as such, the proposed condition will be necessary to achieve that.

- 4.2.2. Relevant to planning and to the development to be permitted - the Standard Conditions are clearly relevant to planning and to the development being considered, as they seek to address the impact of the particular development on TWULs network capacity.
- 4.2.3. Enforceable – As noted above, given that the proposed condition is negatively worded and reasonable in the context of the development given the need to control connection requests made under section 106 of the WIA, the proposed condition is enforceable by the Council.
- 4.2.4. Precise – The proposed condition clearly sets out the steps required for the condition to be discharged and so as to ensure the foul water connection is properly managed.
- 4.2.5. Reasonable in all other respects – As was confirmed in the Barratt Homes case referred to above, the planning system has a key role in moderating the impact of the absolute right to connect given by section 106 of the WIA, and where (as is the case here) off-site works are required, it would be reasonable to expect that a responsible planning authority would impose such a condition. As such, in TWUL's opinion, the condition requested is reasonable to impose.
- 4.2.6. Accordingly, the condition request is not contrary to the policy position and guidance as to the use of conditions.

For the reasons outlined above, TWUL therefore respectfully requests that any planning permission granted pursuant to the Planning Application incorporates its proposed condition.

Thames Water – 4 January 2023

Waste Comments

Following initial investigations, Thames Water has identified an inability of the existing FOUL WATER network infrastructure to accommodate the needs of this development proposal. Thames Water has contacted the developer in an attempt to agree a position for foul water networks but has been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. "The development shall not be occupied until confirmation has been provided that either:- 1. All foul water network upgrades required to accommodate the additional flows from the development have been completed; or- 2. A development and infrastructure phasing plan

The Gardens Trust – 23 August 2022

Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development affecting a site listed by Historic England (HE) on their Register of Parks and Gardens as per the above application. We have liaised with our colleagues in the Buckinghamshire Gardens Trust (BGT) and their local knowledge informs this joint response.

We have looked at the online documentation, and although the Heritage Statement does reference Heatherden Hall, it specifically states that it has excluded Langley Park as the proposed development will not be visible and will *'not distract from, or undermine, the appreciation of the significance of the significance of Langley Park (and associated reciprocal relationships to the built Research - Conserve - Campaign heritage assets it contains) or materially reduce an understanding of its siting with a prevailing rural context.'*

The GT/BGT consider that it is totally inappropriate for the applicant to exclude heritage sites situated so closely, and it is essential that we are given the opportunity to understand how the above application relates to previous proposals for development at Pinewood.

Your officers will be familiar with The Setting of Heritage Assets Historic Environment Good Practice Advice in *Planning Note 3 (Second Edition) pub, 2nd Dec 2017 Part 1 – Settings and Views*. (SHA). On p2 it states :*' The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.'* It goes on to say (p2) : *'When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change'* and (p5) *'While many day-to-day cases will be concerned with development in the vicinity of an asset, development further afield may also affect significance, particularly where it is large-scale, prominent or intrusive. The setting of a historic park or garden, for instance, may include land beyond its boundary which adds to its significance but which need not be confined to land visible from the site, nor necessarily the same as the site's visual boundary.'*

We ask that your officers request clarification from the applicants as to the relationship of this application to those previously made. Whilst this information may be contained in the documentation, our County Trusts are volunteers who have a large number of applications to consider so this information will be very helpful.

In the interim we wish to submit an objection until we are able to fully assess the potential impact upon Langley Park.

The Gardens Trust – 9 September 2022

Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development affecting a site listed by Historic England (HE) on their Register of Parks and Gardens as per the above application. We have liaised with our colleagues in the Buckinghamshire Gardens Trust (BGT) and their local knowledge informs this joint response.

We previously issued an interim objection dated August 23rd 2022 on the grounds that we considered the application excluded Langley Park from its heritage assessment. We asked that your officers request clarification from the applicants as to the relationship of this application to those previously made and, whilst we acknowledged that this information may be contained in the documentation, we pointed out that our County Trusts are volunteers who have a large number of applications to consider so this information will be very helpful.

We have since received a letter dated 24th August 2022 from Sara Dutfield on behalf of Turley which helpfully clarifies that the previous scheme has received planning consent and that, in assessing the previous scheme, the Heritage Officer confirmed; "*The heritage assets identified at Langley Park and St Margaret's Church have sufficient separation distance and the presence of intervening development ensures the setting of these assets will not be affected by the proposed development.*"

We are content therefore to withdraw our interim objection to this scheme on the grounds that the Planning Authority consider there is no impact on Langley Park.

Trees Officer – 11 August 2022

The site is subject to two Woodland Orders known as no.03, 1950. Also Brown's Wood and Hawks Wood are classified as Ancient Woodland (AW). The Forestry Commission and Woodland Trust is a non-statutory consultee on developments in or within 500m of an AW <https://eur03.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.forestry.gov.uk%2Fforestry%2Finfo%2F98uh7n&data=05%7C01%7Cplanning.comments.cs%40buckinghamshire.gov.uk%7C4efdb4a0564740c0d55108da7ba7426e%7C7fb976b99e2848e180861ddabecf82a0%7C0%7C0%7C637958255548927020%7CUnknown%7CTWFpbGZsb3d8eyJWljoimC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IklhaWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=gR1blwcu fCZgQG DY0usS%2FmQB1CSv5LqU1YnIPmfJOP4%3D&reserved=0>. Joint standing advice by FC and NE can be found on the following link

<https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.gov.uk%2Fguidance%2Fancient-woodland-and-veteran-trees-protection-surveyslicences&data=05%7C01%7Cplanning.comments.cs%40buckinghamshire.gov.uk%7C4efdb4a0564740c0d55108da7ba7426e%7C7fb976b99e2848e180861ddabecf82a0%7C0%7C0%7C637958255548927020%7CUnknown%7CTWFpbGZsb3d8eyJWljoimC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IklhaWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=jct%2Bqwfq%2FEFxfwF8JiUdx41cmLeF%2FKukyG52k8w%2FV4U%3D&reserved=0>

Joint standing advice by FC and NE can be found on the following link <https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.gov.uk%2Fguidance%2Fancient-woodland-and-veteran-trees-protection-surveyslicences&data=05%7C01%7Cplanning.comments.cs%40buckinghamshire.gov.uk%7C4efdb4a0564740c0d55108da7ba7426e%7C7fb976b99e2848e180861ddabecf82a0%7C0%7C0%7C637958255548927020%7CUnknown%7CTWFpbGZsb3d8eyJWljoimC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IklhaWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=jct%2Bqwfq%2FEFxfwF8JiUdx41cmLeF%2FKukyG52k8w%2FV4U%3D&reserved=0>

Joint standing advice by FC and NE can be found on the following link <https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.gov.uk%2Fguidance%2Fancient-woodland-and-veteran-trees-protection-surveyslicences&data=05%7C01%7Cplanning.comments.cs%40buckinghamshire.gov.uk%7C4efdb4a0564740c0d55108da7ba7426e%7C7fb976b99e2848e180861ddabecf82a0%7C0%7C0%7C637958255548927020%7CUnknown%7CTWFpbGZsb3d8eyJWljoimC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IklhaWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=jct%2Bqwfq%2FEFxfwF8JiUdx41cmLeF%2FKukyG52k8w%2FV4U%3D&reserved=0> which outlines what LPA's should consider when development is near ancient woodland or/and veteran

trees. If the FC is consulted the following link provides Forestry Commission Area Office contact details

<https://eur03.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.forestry.gov.uk%2Fenglandareas&data=05%7C01%7Cplanning.comments.csb%40buckinghamshire.gov.uk%7C4efdb4a0564740c0d55108da7ba7426e%7C7fb976b99e2848e180861ddabecf82a0%7C0%7C0%7C637958255548927020%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjojV2luMzliLCJBTiI6I6k1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=cjqD0rKHsM2Mk5JyValqTcXi66cHdgEgAG3Vki9QY%2Fk%3D&reserved=0.>

There has been a lot of deliberation by government on the required buffer distance from AW as part of the Environment Bill which as far as I'm aware has still not be determined by Government. Currently buffers should exceed 15m+ but as mentioned an amendment to Environment Bill introduces an 'Ancient Woodland Standard' of 50m to prevent further losses so in line with NPPF (2021) paragraph 180c. This amendment has been passed in the Lords so is returning to the House of Commons for MPs to either accept, modify or reject so this would have implications on this proposal. Hopefully the FC and WT can give more information on this matter as buffer zones should consist of semi-natural habitats to help the council as well as applicant to consider implications of this application accordingly.

I have reviewed the submitted arboricultural report and TPP's by SJA Trees Arboricultural Planning Consultants (2022). It would be helpful for a site visit to take place with other internal specialists to assess the implications of this outline application, especially the retention and removal of trees now and in the future if planning permission was permitted for proposed development of the site to fully assess the arboricultural implications as described in the AIA.

Trees Officer – 6 September 2022

Please refer to previous comments on the 11 August 2022 for reference and as you are aware visited site last week.

Tree Protection Plan drawings (Alderbourne Farm - TPP 22145-041) and (south - TPP 20319-041c) have been submitted illustrating trees to be retained and protected. Drawing also lists trees to be removed (20 trees, 8 hedgerows and 3 partially removed hedgerows by species and identification numbers). A summary report by SJA Trees has been submitted which states it is an assessment report in accordance of BS 5837 guidance of the arboricultural impacts of the proposed development. It includes a summary of arboricultural findings on both sites and I agree with paragraph 2.2.2 that mature oak trees nos. 153, 154, 159, 162, 165 and 168 are prominent landscape features as well as Black Park woodland and T27-T31. Paragraph 3.2.6 - 3.2.9 noted.

Appendix 2 has a outlined Arboricultural Method Statement (AMS) with tree surveys from 2020 (south - appendix 3) and 2022 (Alderbourne Farm - appendix 4).

If planning permission is permitted a suitable planning condition would be ST17.

Trees Officer – 22 December 2022

No further comments to add following previous comments on the 6 September 2022 and 11 August 2022.

The WT and FC will hopefully clarify the current required buffer distance from AW as part of the Environment Bill which as far as I'm aware has still not been determined by Government. Buffer zones should consist of semi-natural habitats to help the council as well as applicant to consider implications of this application accordingly.

I note the WT objection (25 Nov 2022) to application that a larger buffer zone is required from the currently proposed 15m to 50m or for the car park to be relocated from adjacent AW. The WT objection is a material consideration for the council as they are joint authors of national standing advice to government in regards to AW buffers.

Waste Management – 22 December 2022

We in waste consider this as commercial consultation and therefore we currently do not consult on commercial developments. We provide consultation for domestic residential settings only. We advise to source waste disposal from a private contractor.

Woodland Trust – 25 November 2022

Thank you for consulting the Woodland Trust on the following application.

We hold concerns regarding the new car parks proposed on the Alderbourne Farm site, as they will be sited adjacent to Browns Wood ASNW (grid reference: TQ0163585340).

While we note that a buffer zone has been afforded to the ancient woodland, given the number of vehicle spaces proposed we consider that a larger buffer zone of 50 metres should be afforded to ensure that the woodland is not subject to adverse air quality impacts from vehicle emissions. If a suitable buffer cannot be implemented, the proposed parking should be re-located away from the ancient woodland boundary.

We wish to refer you to Natural England and Forestry Commission's standing advice which states the following: "*For ancient woodlands, the proposal should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage (known as the root protection area). Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone. For example, **the effect of air pollution from development that results in a significant increase in traffic.***"

In summary, the Woodland Trust will be lodging a **holding objection** to the proposals until our concerns are addressed.

Michelle Bolger Landscape Review - November 2022 Executive Summary only

Introduction & Background

1.1 Buckinghamshire Council have commissioned Michelle Bolger Expert Landscape Consultancy (MBELC) to review the landscape and visual impacts of planning application Ref: PL/22/2657/FA. This is a hybrid application which relates to two separate sites and development proposals:

- Alderbourne Farm - relates to 35.4 hectares (ha) of land at Alderbourne Farm where it is proposed to develop 2.9ha of 'backlots' (open air filming), replace existing farm buildings with film production buildings and change the use of 25.6 ha of agricultural land to create a nature reserve with new permissive footpaths.
- Pinewood South - relates to 32.6 ha of land south of Pinewood Studios West where it is proposed to develop buildings for film production, educational and business uses (total gross external area (GEA) 31,458m²), together with backlot, multistorey car parks, and green and blue infrastructure.

1.2 Existing development at Pinewood Studios is split by Pinewood Road (ES Figure 7.1). West of the road is the original development at Pinewood Studios West (approximately 45 ha). East of Pinewood Road and south of Seven Hills Road is Pinewood Studios East which was allowed at an appeal recovered for determination by the Secretary of State in 2014¹ and is mostly built out.

1.3 Pinewood South has an existing outline planning permission³ for a visitor attraction, film production buildings, an education and business hub (total GEA 69,677m²). The decision issued by Buckinghamshire Council in 2021 refers to two alternative development layout options (A and B). For ease of comparison, Figures 1 to 3 appended to this review have been prepared to illustrate the differences between the consented options and the current proposals. The main difference is that the current proposals would almost double the provision for built form which would extend across a greater area within the site. Multistorey car parking is proposed instead of the consented surface level car parking which increases the area with potential for built form.

1.4 The proposed development at Alderbourne Farm was not part of the previously consented development. It is a new and separate development proposal (refer Figure 4).

Landscape Character Context

1.5 The two sites in the current application are located 1km apart⁴ and separated by existing development at Pinewood Studios West. The Pinewood South site is located immediately south of Pinewood Studios West. The Alderbourne Farm site is located opposite the northern edge of Pinewood Studios West and Pinewood Studios East but is separated from them by Pinewood Road and Seven Hills Road. Both Alderbourne Farm and Pinewood South are located within the Green Belt and the Colne Valley Regional Park (CVRP) (ES Figure 7.2). The eastern edge of Black Park Country Park (BPCP) is the western boundary of Pinewood South⁵ and Pinewood Studios West. The northernmost point of BPCP is opposite Alderbourne Farm.

1.6 Seven Hills Road marks the boundary between two different landscape types and landscape character areas (LCA) in the South Bucks District Landscape Character Assessment, 2011 (SBLCA 2011)6 (ES Figure 7.6).

- North of Seven Hills Road is an undulating 'river valley' landscape type and LCA 23.1: Alder Bourne River Valley. This is where Alderbourne Farm is located.
- South of Seven Hills Road is a broadly flat 'river terrace' landscape type and LCA 22.4: Iver Heath Mixed Used Terrace. This is where Pinewood South and the existing development at Pinewood Studios East and West are located.

Alderbourne Farm (Landscape Effects)

1.7 Unlike existing development at Pinewood Studios, the proposed development at Alderbourne Farm is located north of Seven Hills Road. Compared with existing development, the proposals would be located in:

- a different landscape character type.
- a different landscape character area.
- a different historic landscape character type.

1.8 Development at Alderbourne Farm would impact upon rural characteristics of the Alder

Bourne River Valley. It would be apparent that studio development had extended into the valley as the field closest to Seven Hills Road⁷ on the upper valley side would be replaced with a substantial 2.4ha backlot. The proposals would diminish the sense of 'rural naturalness' which is a distinctive quality of the Alder Bourne River Valley. The development would also harm landscape and visual sensitivities identified for LCA 23.1, including the:

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

1.9 The overall sensitivity of the local landscape to the changes proposed at Alderbourne Farm is medium/high. With a medium magnitude of change the overall effect upon the local landscape would be moderate/major adverse.

1.10. The proposed nature reserve would have a beneficial impact on the natural heritage and recreational qualities of the site through improved management and through the introduction of new permissive routes. It would be sympathetic to local landscape character and would achieve CVRP Purposes and the Strategy and Vision for LCA 23.1. It would also achieve objectives within the Colne Valley Regional Park Action Plan. However, the proposals for a nature reserve would not mitigate the harm described above.

Alderbourne Farm (Visual Effects)

1.11 Visual receptors most affected by the proposals at Alderbourne Farm would be:

- People on Seven Hills Rd and Alderbourne Ln. Up to Moderate adverse initially, potentially reducing to between negligible and minor/moderate adverse after 15 years).
- People within BPCP on the section of bridleway WEX/21/1 opposite the site. Moderate adverse initially, potentially reducing to minor adverse after 15 years).
- Residents within Springfield Cottages who have an outlook over the field in which it is proposed to locate Backlot A. Major adverse initially, potentially reducing to moderate/major adverse after 15 years

Pinewood South (Landscape Effects)

1.12 Pinewood South is located on a flat terrace immediately south of Pinewood Studios West. It is framed along its length to the east by Pinewood Road and to the west by BPCP. The site consists of grassy fields, restored following minerals extraction and subsequent inert landfilling. Although the SBLCA 2011 describes LCA 22.4 as a 'discordant landscape which often lacks unity'⁸, there is a strong sense of unity at Pinewood South due to the:

- long, straight, and consistent edges created by Pinewood Road and BPCP;
- the constant wooded background when viewed from Pinewood Road; and
- flat open grassy fields which occupy the site.

1.13 When travelling along Pinewood Road, the site is experienced as a tract of open countryside between the existing Pinewood Studio developments to the north and residential development to the south. From the eastern edge of BPCP, there are long views out across fields within the site. These fields provide a coherent rural setting to the Park and bridleway WEX/21/1, and a buffer of open space between the Park and Pinewood Road.

1.14 The proposed development at Pinewood South would replace grassy fields within the site with a substantial development that would:

- Result in the loss of a considerable tract of open countryside between the existing Pinewood Studio developments to the north and development to the south.
- Result in the loss of long views out across fields within the site from bridleway WEX/21/1, and harm the rural setting to BPCP.
- Result in the loss of an open space buffer between BPCP and Pinewood Road.
- Result in the loss of attractive views from Pinewood Rd to woodland within BPCP.

1.15 The proposals would harm landscape and visual sensitivities within LCA 22.4, as described in the SBLCA, 2011, through:

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

1.16 The overall sensitivity of the local landscape to the changes proposed at Pinewood South is medium/high. With a medium/high magnitude of change the overall effect upon

the local landscape would be moderate/major adverse. This is considered to be broadly similar to the level of harm of the consented development.

Pinewood South (Visual Effects)

1.17 Visual receptors most affected by development at Pinewood South would be:

- People on Pinewood Rd. Moderate/major adverse initially, potentially reducing to moderate adverse after 15 years.
- People within BPCP on bridleway WEX/21/1 alongside the site. Major adverse initially, potentially reducing to moderate/major adverse after 15 years.
- Residents within Park Lodge & Royal Lodge. Major adverse initially, potentially reducing to moderate/major adverse after 15 years.

1.18 The level of harm to the visual amenity of people within BPCP and the residents in Park Lodge & Royal Lodge is similar to the level of harm of the consented development.

However, the current proposals would have a greater impact on people using Pinewood Rd.

Conclusion

1.19 Each of the developments at Alderbourne Farm and Pinewood South would result in adverse landscape and visual effects that are considered to be significant because they would:

- Harm landscape qualities identified in this review.
- Harm landscape and visual sensitivities identified within the SBLCA, 2011.
- Not achieve the Strategy / Vision for the respective landscape character areas, in which they are both located.
- Not achieve the purposes of the Colne Valley Regional Park, in which they are both located.

1.20 The proposed developments would result in adverse cumulative landscape and visual effects in combination with existing development at Pinewood Studios. These effects relate to the loss of a connection with the countryside along the western side of Pinewood Rd and the eastern side of bridleway WEX/21/1. Conclusion when comparing current proposals against existing consent

1.21 Compared with the consented development on Pinewood South, the proposed development would have a greater impact on the visual amenity of receptors in the local landscape, particularly people using Pinewood Rd. Notwithstanding this impact, the fundamental landscape harm, as it relates to Pinewood South, is broadly consistent with the consented development, and therefore this development on its own is likely to be considered to be acceptable.

1.22 The proposed development at Alderbourne Farm was not part of the previously consented development and is a new and separate development proposal which on its own would cause significant harm, primarily through its location north of Seven Hills Road within the Alder Bourne River Valley. It is recommended that the applicant considers exploring alternative options to accommodate the backlot provision proposed at Alderbourne Farm

elsewhere within the existing studio developments, within Pinewood South or its immediate context where it would relate better to the existing development.

1.23 If the Council is minded to approve the current proposals, information outlined in the conclusion of this report should be requested from the applicant to improve the certainty and/or quality of landscape outcomes.

Buckinghamshire Highways – 10th January 2023

Application Number: PL/22/2657/FA

Proposal: A hybrid application to comprise: Part A - Full application for the change in use of 25.6 ha of land at Alderbourne Farm to form a nature reserve with footpaths, biodiversity enhancements, associated parking and infrastructure. Outline application with all matters reserved (except for principal points of access) for land at Alderbourne Farm for backlots and up to 35,000 sqft (3,252 sqm) of associated film production buildings (workshops) together with access roads and parking; Part B - Outline application for Pinewood South on 32.6 ha of land with all matters reserved (except for three principal points of access) for up to 1,365,000sqft (126,817sqm) of film production buildings (to include sound stages, workshops, offices and ancillary uses), education and business hubs with associated ancillary structures together with backlot, multi storey car parks, accesses and green and blue infrastructure.

Location: Land South Of Pinewood Studios and Alderbourne Farm, Pinewood Road, Iver Heath, Buckinghamshire, SLO ONH

Thank you for your consultation letter with regard to the above planning application. The proposed scheme is an alternative to the Screen Hub UK (SHUK) scheme that was permitted by Buckinghamshire Council in April 2022. It is on the same footprint albeit covers a larger area than SHUK and includes Alderbourne farm. The application documents present this as an effective variation of the existing permission. It must however be stressed that this is a new application, and must be assessed and mitigated based on its own impacts and not on any previous permission that exists. The permitted SHUK scheme promoted a modest level of film production space, an education hub, business development space and a dominant feature of that application was a visitor attraction that was presented as being of national importance. The scheme before us is fundamentally different in nature being as it is nearly entirely film production with the business hub and education elements retained as minor elements within the application.

Introduction and matters of principle

The TA sets out the requirements of the National Planning Policy Framework, in relation to determining applications in Highway Terms. Paragraph 110 and 111 of the National Planning Policy Framework sets out the following tests when considering the traffic impacts of a planning application;

Para 110. In assessing sites that may be allocated for development in plans or specific applications for development, it should be ensured that:

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

Para 111. *Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe.*

The Highway Authority has tested this application against these criteria and come to its recommendation in the light of these tests.

The location of the development within Iver is remote from a significant centre of population and not easily accessible via public transport, with limited bus services in the vicinity and the rail/tube stations being beyond an acceptable walking distance. The development location therefore lends itself to the dominant mode of travel being the private car.

The TA sets out in section 1.2 the development background, this summarises the applications known as PSDF (13/00157/OUT) and SHUK (PL/20/3280/OA) and seeks to set out the highway works and s106 agreements within these two applications. It is notable that the PSDF application carried with it an obligation to deliver a traffic signals scheme at Five Points Roundabout (FPR) which has not yet been delivered. In 2019 an application for an alternative mitigation, Sevenhills Road (SHR) (PL/19/4430/FA) improvement was received and subsequently approved as a variation to the PSDF s106 agreement. On granting of permission Pinewood Studios served notice on the Council that they would implement the FPR scheme to fulfil the obligation of PSDF mitigation. There is currently a planning application with the council for this scheme (PL/21/4074/FA).

The SHR scheme was supported by a Transport Assessment carried out by iTransport, that sought to demonstrate that 30% of the traffic generated by Pinewood Studios was reaching the Strategic Road network at the M40 Junction 1, Denham interchange. It was found that

the scheme was an acceptable alternative to FPR to mitigate the impacts of PSDF by reducing the traffic pressure on FPR by the removal of that proportion of traffic and redirecting it away from Pinewood Studios via SHR and onward to the M40.

The SHUK application, (PL/20/3280/OA) used the same assessment criteria and network within its assessment. The visitor attraction would be accessed by persons from all over the country reaching the site from the Strategic Road Network, of which the closest location available is the M40 Junction 1. The nature of a visitor attraction promoted a significant proportion of visitors via coaches throughout the day which limited the impacts of peak hour traffic.

This application is fundamentally different from those previous applications and therefore it is necessary to assess it as such. This is a new application that seeks to develop large scale filming and production facility on the land, which will employ large numbers of people from surrounding residential areas, namely, Slough, Uxbridge and Hillingdon, Gerrards Cross, Beaconsfield and the surrounding small towns and villages within South Buckinghamshire and across London. This is a dispersed resident workforce that will approach the site from all directions. The number of employees at the site is also to be significantly different from that of the visitor attraction, and this will be borne out within the trip generation of the site, that will be significantly different in volumes and pattern from the previous application.

As a result, this application cannot be considered to be similar in transport terms to the SHUK application, rather if it has parallels with previous applications it can only be considered similar with the PSDF application and should be assessed in a similar manner to that application.

The applicant has carried out their transport assessment on a first principles approach over the assessed network and submitted the results of local junction modelling, which was the methodology used with the SHUK application. In review of this technical information the Highway Authority determined that the information provided allowed appropriate assessment of the network and a determination of the impacts.

To have confidence in the results of this methodology the Highway Authority has undertaken further review of additional evidence to determine the baseline traffic for the highway network. Future developments by this applicant should expect to use the Iver Strategic Model as the most comprehensive method of assessment, preventing the need for manual assessment of junctions outside the assessed area.

The application has used survey data from March 2022, which was of concern to the Highway Authority given the closeness to the ending of COVID-19 restrictions. In order to address the concerns further information and evidence was required to show that the data provided was representative of true highway conditions and supported across both the local and strategic networks. The Highway Authority has been able to corroborate this information with data gathered by the Council. Sensitivity testing has also been undertaken and supplied to the Highway Authority testing the network under conditions of higher demand and background traffic levels for greater certainty of the networks ability to accommodate the development traffic.

Trip Rates

The trip rates supplied within this application are based on employee turnstile survey data from March 2022, the results of this survey show a significantly lower trip rate than that used and accepted within the SHUK application. These new trip rates are also lower than had been used within the PSDF application. These differences in the trip rates are explained by the development of PSDF which meant that a similar number of individuals would be working across the larger area leading to less overcrowding. The lower trip rates than SHUK have been evidenced as a result of proportions of the employee base now being able to work remotely for some of the week. And the provision of comparative rates to other film production sites show that these lower rates are not dissimilar to other sites. The new trip rates have been fully explained by the applicant and are considered appropriate to apply to the new development.

The accepted base trip rates (the assessment made prior to any sensitivity testing) are as follows;

Table 10.11: Proposed Scheme Traffic Generation (AM Peaks)

	AM Peak Hour 1 (0700 – 0800)			AM Peak Hour 2 (0715 – 0815)		
	Arr	Dep	Two-Way	Arr	Dep	Two-Way
Education hub	6	0	6	20	1	21
Business growth hub	13	2	15	26	2	28
Pinewood South Production Space	619	57	676	486	71	557
Alderbourne Farm Production Space	16	1	17	12	2	14
Total	654	60	714	544	76	620

Source: Tables 10.1, 10.3, 10.7 and 10.9.

Table 10.12: Proposed Scheme Traffic Generation (PM Peaks)

	PM Peak Hour 1 (1715 – 1815)			PM Peak Hour 2 (1730 – 1830)		
	Arr	Dep	Two-Way	Arr	Dep	Two-Way
Education hub	11	16	27	13	14	27
Business growth hub	4	55	59	3	43	46
Pinewood South Production Space	56	481	537	50	498	548
Alderbourne Farm Production Space	1	12	13	1	13	14
Total	72	564	636	67	568	635

Source: Tables 10.1, 10.3, 10.7 and 10.9.

Sensitivity testing has been carried out using these rates as a basis and then uplifting them to ensure that further assessment at a greater level of robustness has been considered.

The existing Sustainability of the site

As previously mentioned the site is not easily accessible via sustainable modes, and has therefore secured travel planning measures in previous applications, including shuttle buses and requirements for cycleway infrastructure. The lack of sustainable travel options was also acknowledged within the Planning Inspectorates report and the Secretary of States findings regarding the 2013 application for the PSDF expansion.

The cycle and pedestrian options within Iver Parish are not complete and do not provide year-round or all weathers suitable provision for use as commuting routes. The current footway/cycleway on Pinewood Road is present but ceases at FPR, it has been the expectation to use developer funding to connect this with National Cycle Route (NCR) 61.

Delivery of pedestrian and cycle improvements are being actively pursued by the Transport Strategy team within the Council at the present time. NCR 61 runs east west through the parish of Iver, 1.6km south of the site and provides connectivity between Slough and Uxbridge. However current guidance states that cycling may provide a viable alternative for short journeys of up to 5km. This distance would reach the centre of Uxbridge or the northern edge of Slough, via the A4007 and the A412 respectively. The A412 Uxbridge Road is a high-speed dual carriageway, which is unsuitable for cycling. NCR61 would represent a significant southerly diversion from the centre of Uxbridge to reach the site and uses unlit routes including the bridge over the M25 at Palmers Moor Lane and Love Green Lane.

The A4007 Slough Road has no cycle provision on it and there is no current cycle provision to either Iver or Langley stations. Whilst there have been improvements to the provision in the area as a result of PSDF and other measures that were secured under SHUK, these do not yet represent a connected comprehensive network of sustainable travel options.

The Public Rights of Way (PROW) network in the Iver area provides connections between parts of the parish. However, these are principally recreational routes at the present time. The PROW network is important and should be improved and supported, though without significant improvements to make the surfaces suitable for all weather use by pedestrians and cyclists it does not constitute a network that should be considered part of the provision of the access the development.

Considering the Public Transport provision in the area, there is very limited access to the site by commercial bus route 3. The nearest stop is found east of FPR 500m from the closest corner of the site, well in excess of the current maximum recommended distance of 250m. The true distance to this stop is greater than this, as the development itself is 800m in length. The services do not provide a comprehensive timetable. To mitigate this previously Pinewood have provided private shuttle bus connections to local rail and underground stations. The shuttle bus service provides private connection to rail stations radially notably with the exception of Iver and Langley station.

Introduction to local highway network

The local highway network is known to be significantly congested, with particular issues known to be present on the A412 Church Road, FPR and the junctions between Thornbridge

Road and Bangors Road North. There are also significant issues on the double mini roundabout at Bangors Road North/Bangors Road South/Slough Road. Sevenhills Road currently remains a link of poor quality with a section that is a single track road without passing places at its western end. FPR has also known to experience congestion issues hence the requirement for signalisation. The junction of SHR with the A412 Denham Road is known to perform poorly, with long delays to exit and turn right into Sevenhills Road representing a safety concern when these movements are performed during peak traffic conditions, and the SHR planning application demonstrated this.

The congestion and characteristics of the local highway network causes the local highway network to be a threatening and unwelcoming environment for walking and cycling, as identified within the Iver Neighbourhood Plan, which seeks to address this through ambitions to provide extensive improvements to the sustainable infrastructure.

It is therefore necessary that this application makes its own independent proposals for mitigation based on the trip generation and activity that this application will introduce. Further comments shall be made regarding this matter later in this response when considering the Travel Plan and the proposals presented, and appropriate obligations within the s106 table at the end of this response.

Road Safety Assessment

The road safety analysis shows that the highway network does not have any pattern of collisions due to highway design. The applicants do acknowledge local concern at the junction of Black Park Road with the A412, and the way in which the Highway Authority has implemented a safety improvement addressing turning movements (removing right turns out of Black Park Road and modifying the ability to make U turns) at that junction in 2019. This reflects the improvement that has been seen within the recorded accident statistics. It is noted that the applicants propose a contribution of £25,000 towards safety improvements at this junction. This contribution is accepted as the development will see an increase in traffic in the area, and the presence of a new left in left out access point on the A412 close to this junction. The applicants haven't given a specific proposal that the Highway Authority would seek to progress at this time. Road Safety colleagues are supportive of the contribution, that should be secured for mitigation that can be implemented on the A412 in support of the existing safety scheme.

Local Highway Network Assessment

As has been previously noted the highway network that has been assessed within this application is the same as that which has been used for the SHR and SHUK applications. It has been previously outlined within this response as to why those assessments have been accepted.

The network assessed has been identified using Automatic Number Plate Recognition (ANPR) survey data which identifies ~30% of Pinewoods existing traffic travels (tables 7.1 and 7.2 of the SHR application TA) to reach the M40 and onward to the M25 and wider network. With the introduction of the SHR scheme that traffic would be expected to reallocate away from the rest of the network.

The remaining traffic disperses over the network to the south and east of FPR and out of the Buckinghamshire network into the neighbouring areas. The Highway Authority initially had concerns with the cordon area used for the assessment and that it was not large enough. In response to this concern further work has been carried out to identify the potential volumes of traffic that could reach the wider network through the sensitivity testing, and the Highway Authority is content that the junctions beyond the assessed network would be impacted by low enough numbers of vehicles not to be a change in volumes that would require assessment or mitigation.

The peak hours used within the assessment are acceptable, and the premise of the overlapping assessment hours is continued from previous applications. This ensures that both the development peak hour traffic and the network peak hours are assessed fully.

Operational Assessments of junctions.

The baseline presented a less congested network than that presented for the SHUK application, with FPR, Pinewood Road/Pinewood Green and the SHR/A412 Denham Road junction now being presented as currently operating within theoretical capacity due to the use of a new set survey data. The Highway Authority was concerned by the degree to which the results differed from previous assessment and needed to be satisfied that the surveys gave a reliable representation of the network. To address these concerns two sets of sensitivity tests were carried out, and all other available local and national traffic data sets were scrutinised. The baseline models have been subject to robust assessment and the results of these describing the current performance of the network are now accepted by the Highway Authority.

A summary of the current junction performance is set out overleaf, as found in table 4.10 of the TA;

Junction	2022 Operation
Pinewood Road / Pinewood East Access	Below Operational Capacity
Pinewood Road / Pinewood West Access	Below Maximum Capacity
Pinewood Road / Sevenhills Road	Below Operational Capacity
A412 Denham Road / Sevenhills Road	Below Maximum Capacity
Pinewood Road / Pinewood Green	Below Operational Capacity
Five Points Roundabout	Below Maximum Capacity
A412 Church Road / Thornbridge Road	At Capacity
A412 Church Road / Bangors Road North / A412 Denham Road	Below Maximum Capacity
A412 Uxbridge Road / Black Park Road	Below Operational Capacity

The table uses Ratio of Flow to Capacity (RFC) values to determine the thresholds for the colour coding, below 0.85 for below operational capacity, between 0.85 and 1 for below maximum capacity and greater than or equal to 1 for at theoretical capacity.

Proposed Scheme and access

The proposed scheme is for two key elements, the development of the land south of Pinewood Studios as production studios, education hub and a business growth hub (Centre Stage), and to the north of the existing studios: backlots; workshops; and a nature reserve at Alderbourne Farm. This proposal turns Pinewood studios into a campus of four sites, served by Pinewood Road and the western end of Sevenhills Road. It was a concern to the Highway Authority that this section of the public highway stands to become a defacto estate road serving internal movements between the different elements of the Pinewood estate. In order to demonstrate that the proposals will not prevent Pinewood Road remaining available for normal use by the traveling public, including residents on Pinewood Road and Pinewood Green an internal trips assessment has been supplied showing that the numbers of expected internal trips using Pinewood Road are not greater than 10 in any one peak hour and this is not a concern to the Highway Authority.

The Pinewood South element of the development is proposed to be accessed by two access points on Pinewood Road and one left in and left out access point on the A412 Uxbridge Road on the approach to Five Points Roundabout. These access points are as designed and approved by the previous permission for Screen Hub UK and are therefore established as being safe and suitable for accessing the site.

Mindful of the above comment the development proposals do not present any description of additional security gateway proposals, such as are found at Pinewood West, or Pinewood East. Rather the accesses are described as being as proposed for the SHUK application,

priority junctions as were proposed for public access car parks which would allow free dispersal within the car parks. The Highway Authority will therefore require by condition that details of security at the access points are addressed through reserved matters applications. It should be noted that it shall be a requirement of these applications to show how any security measures will be positioned in such a way as to ensure that there will be no standing traffic backing onto the public highway. This shall be by necessity a condition that must be satisfied prior to commencement of the site.

Access to Alderbourne Farm is proposed to be achieved through the creation of a new priority junction on Sevenhills Road, within the new section to be created as part of that scheme. The principal of this access is accepted, however it is noted as above that as a matter of reserved matters it will be required that details of the separation of the public access and the secure studio activities are to be managed and arranged.

It is proposed that layby parking will be maintained on the A412 Uxbridge Road through re-provision of parking spaces within other laybys. This is accepted and required by the Highway Authority to ensure that there is no loss in provision of these well used laybys and therefore no worsening of the highway safety with additional parking taking place on the dual carriageway.

Pedestrian and cycle access to the site is proposed to be provided to the studios space through the existing footway on Pinewood Road and the provision of footways into the site at the access locations.

Alderbourne Farm will have a pedestrian access along the existing farm access for the public access areas.

As all other matters are reserved other than access this is not an opportunity to comment on matters of the internal road layout or parking provision, however at the reserved matters stage it will be necessary for the applicants to supply a comprehensive parking accumulation exercise in order to demonstrate the parking provision is appropriate within the multi-story car parks.

Scheme impacts

The Transport Assessment presented assessment of impacts in 2026 and 2036, as a year of opening and the end of the local plan period in line with normal practise. Comparative assessments have been carried out between a future year of no development on the site, the previously permitted Screen Hub UK proposals and the future year with this development. All future year assessments include both the Five Points Roundabout and Sevenhills Road schemes being implemented.

Since the submission of the Transport Assessment, to address the concerns of the Highway Authority additional capacity testing has been submitted in the form of technical notes. These notes are titled;

ITL17509-024A TN Sensitivity Test Scenario

ITL17509-025 TN Traffic Flow Diagrams and Comparison

ITL17509-032TN ATC Analysis and Sensitivity Test 2 Parameters

ITL17509-030A TN Sensitivity Test 1 [2nd issue]

ITL17509-034 TN Sensitivity Test 2

ITL17509-037A cumulative Impact Assessment

ITL 17509-042 TN Potential Internal Trips

This response shall address the information contained within these notes following assessment of the information contained within the Transport Assessment, and explanation of the concerns that give rise to the additional information being provided.

It should be noted that the assessments of the highway impacts assume full development build out, and the full implementation of mitigation schemes at Five Points Roundabout and Sevenhills Road. The expectation of these schemes being implemented permits the applicants to reassign traffic over the network. The reassignment approach that has been used is the same as was submitted and accepted by the Highway Authority during the application for the Sevenhills Road scheme.

The Transport Assessment sets out that the overall trip generation of this proposal is less than that for the previously permitted Screen Hub UK application. It is accepted by the applicants that this proposal will result in greater numbers of peak hour trips, but less trips in the inter peak periods and at weekends, as would be expected due to the differences in the nature of the applications, and the absence of the visitor attraction element.

The modelling results supplied cover the following junctions:

- Pinewood Road /Pinewood East Access
- Pinewood Road/Pinewood West Access
- Pinewood Road/Sevenhills Road
- A412 Denham Road/Sevenhills Road
- Pinewood Road/Pinewood Green
- Five Points Roundabout
- A412 Church Road/Thornbridge Road(Mini Roundabout)
- A412 Church Road/Bangors Road North (Mini Roundabout)
- A412 / Black Park Road
- Pinewood Road site accesses
- A412 left in/left out access
- Alderbourne Farm site access

The above modelling uses the same models that were submitted for previous applications and therefore the geometry, calibration and fixed parameters within them has been checked and accepted by the Highway Authority.

A summary of the modelling impact assessment comparing the ‘without development’ against the ‘with development including mitigation’ is shown below (taken from table 13.23 of the Transport Assessment). This table includes the summary of the assessment of the SHUK to provide a comparison between the two schemes. It is helpful to understand this given that the Highway Authority has previously accepted that impact.

Table 13.23: Summary of Traffic Impact Analysis

Junction	Do Nothing	With SHUK	With Development
Pinewood Road / Pinewood East Access	Below Capacity	Below Capacity	Below Capacity
Pinewood Road / Pinewood West Access	Below Maximum Capacity	Below Maximum Capacity, with reduced queuing and delay compared with Do Nothing	Below Maximum Capacity, with reduced queuing and delay compared with Do Nothing
Pinewood Road / Sevenhills Road	Below Capacity	Below Capacity (<i>with new roundabout</i>)	Below Capacity (<i>with new roundabout</i>)
A412 Denham Road / Sevenhills Road	Over Capacity	Below Capacity (<i>with new signals</i>)	Below Capacity (<i>with new signals</i>)
Pinewood Road / Pinewood Green	Below Capacity	Below Capacity	Below Capacity
Five Points Roundabout	Below Capacity (<i>with new signals</i>)	Below Capacity (<i>with new signals and SHR upgrade</i>)	Below Capacity (<i>with new signals and SHR upgrade</i>)
A412 Church Road / Thornbridge Road	Over Capacity	Over Capacity, but with reduced queuing and delay compared with Do Nothing	Over Capacity, but with reduced queuing and delay compared with Do Nothing
A412 Church Road / Bangors Road North / A412 Denham Road	Below Maximum Capacity	Below Maximum Capacity, with reduced queuing and delay compared with Do Nothing	Below Maximum Capacity, with reduced queuing and delay compared with Do Nothing
A412 Uxbridge Road / Black Park Road	Below Capacity	Below Capacity	Below Capacity

The following assessment description focuses on the primary junctions impacted by development traffic which are: the A12 Denham Road/ Sevenhills Road; the two mini roundabouts on Church Road with Thornbridge Road; Bangors Road respectively and Five Points Roundabout. Points of access and junctions that are minimally affected have also been reviewed.

A412 Denham road/Sevenhills road

This junction is operating over capacity with long wait times on Sevenhills Road, this relates to the extremely dominant flow along the A412 at this location preventing the opportunity for vehicles to turn right into Sevenhills Road or to exit Sevenhills Road. The modelling results reflect this with movements at this junction being reported as having an RFC of greater than 1, and on Sevenhills Road in excess of 2. The generally agreed practical capacity of a junction is at an RFC of 0.85 or 85%. While junctions can still operate within theoretical capacity with an RFC value of up to 1 (100%), as theoretical capacity approaches 100%, delays will increase significantly. Without mitigation at this junction the results in the future year (2036) with development traffic, leads to an infinite result, indicating that the junction performance deteriorates to such an extreme that the model is no longer able to provide any functional estimation of the situation.

With the signals in place the results improve, providing control of the dominant flows, and enabling right hand turn manoeuvres to be undertaken in a safe manner with controlled turning movements, (it should be noted that traffic signals modelling results are reported in a different manner), and the Sevenhills road arm of the junction operates just within capacity. Queuing and delay are reduced on Sevenhills Road with the most noticeable improvements within the AM peak hours. With the provision of signals and the new development traffic the junction performance comes close to the theoretical capacity, and this is due to new turning volumes. A further sensitivity test has been undertaken to consider the impact of higher development flows at the junction. This is discussed further in the later sections of this response.

A412 Junctions with Thornbridge Road

The Thornbridge Road junction is shown to be operating close to its practical capacity at present and with particular issues occurring in the PM peaks on Thornbridge Road. In the future development year (2036) the situation on this arm improves relative to the situation that would occur due to background growth alone (no development or mitigation), due to reassignment of traffic onto Sevenhills Road. However, whether the development comes forward the A412 arms will remain at or over the maximum capacity.

Bangors Road North

The situation at Bangors Road North is similar, however the results are more favourable than those for Thornbridge Road with the junction performing within theoretical capacity in all scenarios.

Five Points Roundabout

The Five Points Roundabout junction has been modelled only as a signalised junction in the future years, this is due to the requirement incumbent on Pinewood Studios to deliver a scheme to introduce signals at this junction as part of the 2013 PSDF permission. The results

demonstrate that the junction will operate in the 2036 year within capacity, with the greatest demands being placed on the A412 Church Road, wood Lane and the A412 Uxbridge Road. Similarly, the Highway Authority recognises the sensitivity of this junction and the need to ensure that this assessment is robust. Therefore, the sensitivity testing that was required has looked at this junction again.

Site Access Junctions

The site access junctions have been shown to have surplus capacity and therefore the Highway Authority does not have concerns regarding this, subject to the previously discussed requirements to ensure that the security measures that are presented within a reserved matters application to not cause the traffic using these junctions to queue back to the public highway and therefore negate these findings.

Pinewood Green

The junction of Pinewood Green with Pinewood Road operates with surplus capacity due to the re-routing of traffic onto Sevenhills Road. It is expected that with the introduction of the Sevenhills Road scheme less traffic will use Pinewood Green to access the site.

Fulmer

The Transport Assessment proceeds to make assessments of roads to the north and west of the site as well as Pinewood Green. With respect to the north and west (Fulmer parish) it is the Highway Authority's position that there is an impact on this area as a result of the development. This impact is small enough to not warrant junction assessments in this area, but significant enough that the proposed contribution to highway schemes within the parish should be secured to mitigate the impacts of additional through traffic and in recognition of the safety concerns within the parish, regarding speed and highway layout. A contribution is proposed in a similar way for schemes within Iver Parish, the Highway Authority is of the same view with respect to this as that for Fulmer.

Sensitivity tests

To address the concerns of the Highway Authority regarding the lower trip rates used relative to previous applications and the differences in the base line survey data post COVID-19 a sensitivity test (test 1) has been undertaken using the 85th percentile trip rates from the March 2022 surveys. This test has demonstrated that when using this higher trip rate with the full mitigation package in place the network performance remains in a position of being within capacity or those areas that are over capacity are demonstrated to have an improved performance relative to the impacts of background growth without development and the associated mitigation package. The Highway Authority therefore has confidence that even

with an elevated trip rate there are no unacceptable impacts from the development under the parameters of this test.

The second sensitivity test has been carried out to address concerns regarding changes to the turning movements at key junctions and changes in the background traffic levels and growth seen between March and April 2022, noting current traffic volumes are lower than pre-COVID 19 traffic levels. To address these concerns this test uses the 85th percentile trip generation and uplifts the network flows by 4% in the AM peak and 10% in the PM peak. In this test the junctions considered are those on the A412 corridor, and the findings are that the junctions of the A412 Church Road with Thornbridge Road and Bangors Road North suffer a degraded performance, however this is not to the same extent as without development. Additionally, both Five Points Roundabout and the junction of Sevenhills Road with the A412 both remain within operational capacity.

On the basis of these sensitivity tests the Highway Authority is confident that it has a robust assessment of the Highway network that will be influenced by the development proposals and is in a position by which to come to a view regarding the acceptability of the application.

Proposed Highway Mitigation

The proposal relies on two primary pieces of highways infrastructure to facilitate this development. The first of these is the introduction traffic signals at Five Points Roundabout, which as has been mentioned is the required mitigation for the 2013 PSDF scheme. The Council has been served notice that this is to be delivered and an application for this is currently with the Local Planning Authority. This scheme is not mitigation for this application, rather an obligation that is to be delivered for PSDF, that this scheme also depends on. This planning application brings forward improvements to Sevenhills Road as mitigation for the traffic impacts of the development. Details of the scheme are contained within drawings ITL15189-GA-014E to ITL15189-GA-018E. This scheme currently has planning permission which expires in 2024, however it has been assessed and full Highway Authority comments regarding the scheme and its details can be found under planning application number PL/19/4430/FA.

The current condition of Sevenhills road is entirely unsuitable for increases in traffic, the western section of the road is single track without passing places. The road is bounded by hedges and earth banks which limit forward visibility and the ability for opposing traffic to manoeuvre. The proposed scheme provides a full single carriageway road in this section that allows for two way traffic in a safe and suitable manner. The Highway Authority considers that the Sevenhills Road scheme is required to address both highway capacity issues and safe and suitable access to the studios by motor vehicles. The Highway Authority are concerned that even a minor intensification of this single carriageway section of road for accessing both the Alderbourne Farm or Pinewood South elements of the development gives rise to a detriment to highway safety as set out within paragraph 110 of the NPPF.

The Sevenhills Road mitigation also serves to provide a suitable alternative to the route through Pinewood Green which is not appropriate for development traffic being a residential area with a width restriction in its centre. At the junction of Thornbridge Road with the A412 there is an existing congestion issue, compounded by parking for the local shops and services. Development traffic being added to this junction gives rise to safety concerns due to the effective reduction in available carriageway and reduced opportunities for the passing of vehicles. Pedestrian safety is also a concern in an area that suffers from such congestion being present where there are parking manoeuvres taking place.

There is no information contained within the application documents as to how much of the development can be occupied before Sevenhills Road is delivered. The Highway Authority requested an assessment to identify a trigger point at which the mitigation would need to be delivered however the applicants have declined to provide this information. In the absence of a submission being present, in order to identify the trigger for the mitigation being necessary a further assessment shall be conditioned to be submitted prior to commencement and at the point of the first reserved matters application. The Highway Authority notes that the current permission for the Sevenhills Road Scheme (PL/19/4430/FA) requires that the scheme is completed and open within 18 months from commencement on site. This requirement is considered to be a requirement of any renewals of permission to ensure that the mitigation is complete and delivered in a timely way.

It is also proposed that a tarmac footway shall be provided along Pinewood Road to the north of Pinewood East roundabout. This provides pedestrian access to the Alderbourne Farm site for both the backlots and the public access nature reserve.

This development represents significant increases in traffic volumes during the peak hours, and lower impacts in the off peak periods. The SHR scheme provides opportunity to route some of the development traffic away from existing locations of congestion resulting in an impact that is less than severe.

Opportunities for Sustainable travel

To address matters of sustainable transport a Framework Travel Plan (FTP) has been submitted as part of the planning application. The FTP sets out the current mode shares on the site, and the parameters against which targets for changes in mode share are to be set. It also sets out at a high level the measures by which the travel plans shall seek to achieve those targets. These are to be delivered in conjunction with the existing travel planning taking place on the site.

The Highway Authority accepts the Framework Travel Plan (issue 2 revision E) and shall condition this as the basis for detailed travel plans to be submitted as part of reserved matters applications. It is also proposed that the existing shuttle bus services provided by Pinewood to employees and users of the studios will be expanded to cover the new studios space. This is agreed by the Highway Authority as necessary in order to provide connectivity to other

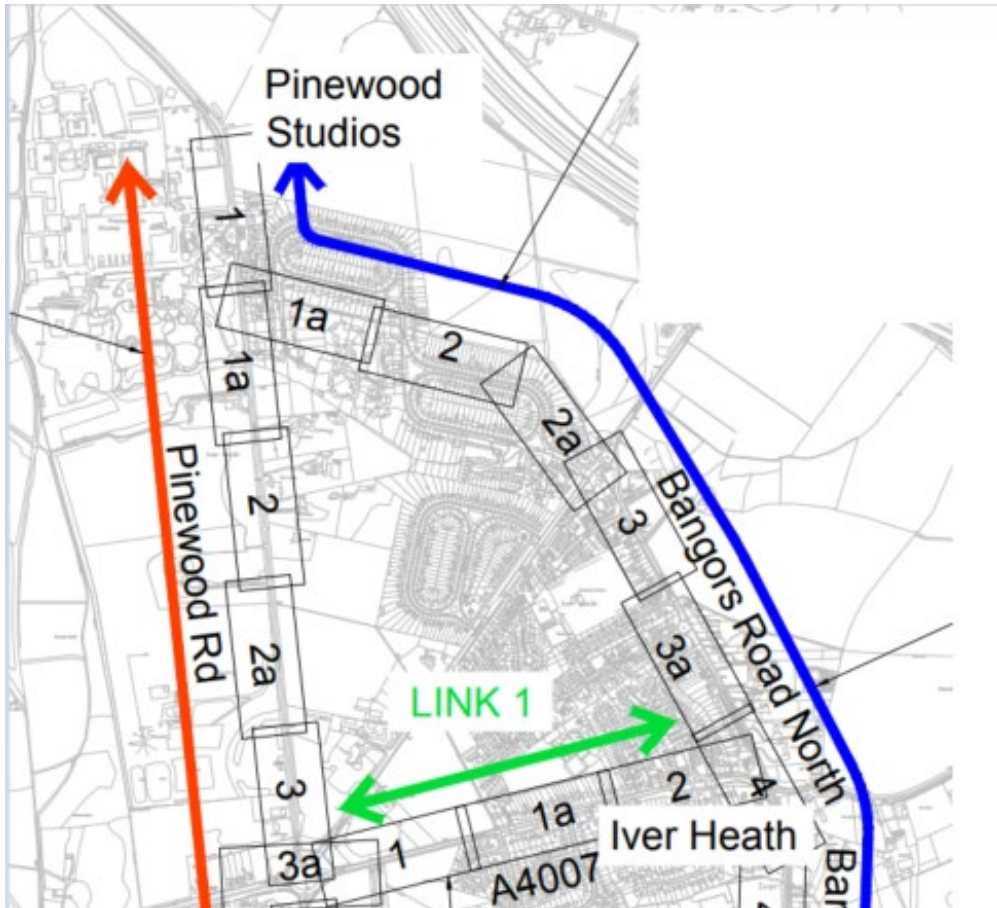
public transport hubs given the particularly low level of provision in the Ivers of commercial bus services.

The travel plan is supported by the provision of a signing strategy for all modes of transport that covers the whole of the Ivers Parish and extends to the M40 Junction 1 in the north. This shall be conditioned to be delivered in full prior to occupation of the site to ensure that staff and visitors have the best available information regarding routing for all modes of transport.

Pedestrian and cycling facilities will be present within the Five Points Roundabout scheme which shall improve access to the site over this junction that is currently a barrier to walking and cycling in the area.

The Highway Authority has considered the wider matters regarding the sustainability of the site and the ability of future people accessing the site, in addition to the findings of previous Planning Inspectors and the Secretary of State regarding the sustainability of the site. The development must meet the following requirements of the NPPF paragraph 110; *Appropriate opportunities to promote sustainable transport modes can be – or have been – taken up given the type of development and its location.*

Both Langley and Iver rail stations are within cycling distance of the studios. The Ivers Cycle Strategy identifies cycle schemes which link Pinewood studios to these rail stations and the local area. The securing of a contribution (relative to the scale and kind of the development) to either a route to Iver or Langley station would enable the development to meet the above NPPF para 110. The Highway Authority proposes this application secures a contribution to enable the delivery of the northern section of the Pinewood - Iver station cycle route. The parts of the route to be secured are along the A4007 Slough Road and through Pinewood Green and Bangors Road north. The sections of routes a financial contribution is sought for enable their full delivery and are identified in the below diagram coloured in blue and green.



i

These routes complement the existing provision that has been made on Pinewood Road between Five Points Roundabout and the studios entrance. They will form options for those approaching from Iver village and station or the Uxbridge area to reach the different access points to the studios.

Construction Traffic

The application does not address the construction traffic impacts within the documentation; however, these are temporary impacts on the highway network and so do not form part of the assessment of this application. The Highway Authority will be conditioning a full Construction Traffic Management Plan, as is standard practice with large sites. This shall be required to be submitted for approval prior to commencement.

Conclusions

To conclude, the Highway Authority has determined that the assessment that has been undertaken, inclusive of the additional information and the conditions and obligations recommended demonstrates that the proposals:

- do not give rise to a severe impact on the highway network;

- safe and suitable travel can be achieved by all uses;
- opportunities to promote sustainable travel have been taken up given the type of development and location; and
- once the full mitigation package is delivered in its entirety the significant impacts of the development on the transport network in terms of capacity, congestion and highway safety will be effectively mitigated to an acceptable degree.

Mindful of the above the Highway Authority have no objections subject to the obligations and conditions set out below:

Buckinghamshire Local Enterprise Partnership- 30 January 2023

In September 2020 Buckinghamshire LEP wrote in support of a planning application being made by Pinewood Studios for expansion. The growth project reflected the ambitions of both the Buckinghamshire Local Industrial Strategy and also the Economic Recovery Plan for Buckinghamshire.

The current application, with a dedicated focus on the development of new film production space, would result in Pinewood becoming the largest film studio in the world and would further support these ambitions and create greater employment and sectoral growth.

We understand that in part the revision is due to the accommodation of international demand that has already committed to the use of the new facilities. This will provide a significant boost to the wider local creative and film sector and to SMEs and independent businesses within the Buckinghamshire area over and above what may have been expected from the original proposal. We are particularly pleased to see a renewed commitment to the education and skills hub within the application, given the demand for talent within this sector. This facility will provide a magnet for world-class training and education for businesses and individuals working within this sector. It will help attract creative talents from across the world into Buckinghamshire as well as providing career pathways for many in the local community.

The Buckinghamshire Local Industrial Strategy identifies the creative and digital sector as a priority for investment and the "Centre Stage" Global Growth hub will clearly improve links between creative content providers and the wider business and specialist education networks both on and beyond the Pinewood lot.

These plans are entirely in line with the strategic objectives for the Creative Industry sector that have been set out by the LEP Board. Furthermore, the economic impact of these proposals is significant for both the national and the Buckinghamshire economy forecast to create over 8,000 full time jobs and increasing local productivity (GVA) by over £640m pa.

In offering their universal endorsement for these exciting proposals, the Board also wanted to highlight their desire to see innovative and integrated transport packages serve the new facilities and that the local business community will have the opportunity to win contracts in

the development through the commissioning and running of the new facilities. We look forward to working with colleagues at Pinewood to help deliver these exciting proposals and bring significant investment into Buckinghamshire

Contributor Letters

Objections:

- Concerns about further development of green area/greenbelt.
- Concerns about increase in traffic and resultant pollution levels in the area.
- Concerns about increase traffic at the 5 Point roundabout – already busy due to HS2 works.
- Concerns that nature reserve will not provide sufficient habitat for local wildlife.
- Concern that local voice is not being included within decision making process
- Concerns that the existing infrastructure is already at capacity and unable to cope
- Concern that local interests are not being protected within decision making process
- Suggestion of using brownfield sites in Buckinghamshire to receive development instead
- Concerns about the legacy of the development of Pinewood Studios. Should filming industry change its needs, what future use will the site have? Concern that this could quickly become a future housing development.
- Concerns about potential increase in noise pollution generated by resultant traffic caused by facility.
- Development are not in keeping with the character of the area/Iver Heath (green countryside) and is becoming more urban.
- Concerns about the ability of roads surrounding Pinewood to support the extra traffic generated. Many roads are small, single track roads including Seven Hills, Alderbourne Road, Hawkswood Lane and Fulmer Lane (all which described as currently struggling with existing traffic levels).
- The blockages caused by roundabouts is redirecting vehicular traffic into single lane roads (Seven Hills Rd, Alderbourne Lane, Cherry Tree lane, Hawkswood Lane, and Fulmer lane), resulting in deterioration of road quality.
- Existing structures at Pinewood Studios are considered a visual eyesore that can be seen from long distance viewpoints.
- Feeling that the inclusion of ‘nature reserve’ on site is token and does not mitigate the changing character the development has on the area – described as industrial.
- Concerns about CIL payments taken by BC and desire to see where this money would go.
- Increase in light pollution caused by filming activity and constant security lighting on site.
- Local residents feel that the bund provision does not screen noise and light sufficiently (particular regards to upper 1st and 2nd storey levels).
- Impact upon personal health and well-being due to level of disruption caused by the current development. Concern that further development with exacerbate this.
- Concerns that Springfield Cottages are too close in proximity to studio backlots and filming activities.
- Concerns that proposed bunds facing Springfield Cottages will reduce sunlight into property but not shield impact of studios upon upper floors.
- Concerns that the previous mitigation measures proposed by prior Studio developments have not been fulfilled - Require Strict conditions to ensure they are included in any potential future development.

- Concern about suitability of nature reserve location – bound by motorway on two sides (will be impacted by noise and pollution).
- Concern about lack of pedestrian access to nature reserve in the scheme.
- Heavy lorries servicing studios are damaging properties on heavily trafficked roads.
- Concerns over loss of mature trees. Replacement planting provision feels small or inadequate to mature species lost.
- Concerns that waterways/streams have become polluted due to leaks caused by studio activities.
- Concerns about lack of main drainage on site.
- Iver Heath Residents Association – view that two applications should have been sought by BC - would help enable stakeholders to assess merits/impact of development rather than hybrid application. (They point out that the application relates to two separate/unrelated locations).
- Concerns about other urban developments in Iver Heath area – Data centres / Motorway services.
- Pedestrians feel unsafe due to increase traffic on many ‘cut through roads’ that lack pedestrian pavements.
- Concern about security of local nature reserve. Fear location will be used for anti-social behaviour (similar to crime in Black Park).
- Concern about wider environmental impact/footprint of studio – does studio have plan to contribute towards CO2 reduction?
- Concerns about the flow of large volumes of non-residents in the area who work on the site.
- Development will destroy characteristics of heritage village.
- Concern that proposal submitted by Pinewood are not sustainable and do not align with UK promise to the Paris Climate Agreement and UN Sustainable Development Goals.
- Questions over the economic benefit for the residents of Fulmer.
- Concerns about loss of hedgerows.
- Increase in anti-social behaviour in the area (Litter).
- Concern about how consultation meetings are conducted – often mid-week in the morning with little notice. Prevent individuals from participating.
- Lack of engagement with the community/local residents.
- Concerns about Air Quality Action Plan for Iver Heath (BC have extended timeline – but impact of Pinewood to be in direct conflict).
- Local residents feel studios offer no benefit to community.
- Concerns about the lack of existing street pavements and street lighting on Fulmer Common Road.

Neutral:

- Concerns about adequate protection from Studio for immediate neighbours.
- Suitable long term governance and funding for Fulmer Nature Reserve.
- Additional traffic calming measure over and above the existing ScreenHub S106 agreement

Support:

- Production companies (Lucasfilm Ltd. And Disney) have successful working relationships with Pinewood Studios producing features for film and television.

- Large scale productions require access to a variety of facilities including stages/soundstages, production spaces, backlots and other associated facilities.
- Co-locating these facilities on a single site is highly beneficial for production companies, reducing production cost and facilitating greater collaboration.
- Pinewood Studio is one of a few locations in the UK that provides the high quality filming facilities in a single location.
- There is a current shortage of high quality studio spaces/stages in the UK due a lack of capacity in existing facilities, even after recent expansion works.
- Suggestion that The *Centre Stage* education and development hub in the proposed expansion will help create new skilled professionals to support the growing film industry in the UK.
- The lack of capacity at Pinewood Studios and other facilities in the UK has resulted in a loss of multiple large scale productions worth multi-million dollars to other international competitors.
- The partnership between Pinewood Studios National Film and Television School (NFTS) will allow NFTS to provide world class opportunities to for education in the filming and television industry at the *Centre Stage* Education and Skills Hub.
- There is a current skill-gap/shortage of skilled professionals in the UK in key areas such as carpentry, lighting and costume which could be addressed by the proposed education hub.
- Pinewood is an established brand and leading iconic studio space in the UK.
- The UK production industry is a grow sector with production spends totalling £5.64 billion in 2021, an increase of 63% (£2.19) from 2017. (Of this figure £4.7 Billion can be attributed to the Pinewood Studio and Shepperton Studio facilities).
- Support shown for the creation of Fulmer nature reserve. The change of use from private farm land to open green space local residents can use is welcomed.
- New walking routes provide opportunities for outdoor recreation/walking.
- Support for new scheme with understanding that it will reduce traffic flow and help accelerate the delivery of much-needed improvements on Seven Hills Road.
- Support for general economic and environmental benefits of the proposed scheme.
- Support for the retention of Black Park Peace Path.