

22/06443/FULEA | Full planning permission for production space and supporting buildings for screen-based media and associated services/industries. The development of approximately 168,718 sqm GEA total floorspace comprising : sound stages, workshops , office accommodation, studio hub associated outdoor space such as backlots and unit bases; entrance structures and reception; security infrastructure, mobility hub; cafes; parking; bridge; incidental supporting buildings; associated infrastructure; public art; upgraded vehicular access onto Marlow Road; new cycle and pedestrian accesses; a new cultural/educational/recreational building; a new community building and associated landscaping, publicly accessible recreational land and ecological and environmental enhancements/habitat creation | Land Adjacent South Side Marlow Road And A404 Junction Westhorpe Park Little Marlow Buckinghamshire

## **Marlow Film Project – Chiltern Society comments**

These comments are made on behalf of the Chiltern Society.

We strongly object to this application for the following reasons.

It would have significant adverse impacts in relation to landscape, biodiversity, and traffic.

It is an area allocated for outdoor recreation and ecological enhancements under Policy RUR4 – Little Marlow Lakes Country Park, and would prejudice and fatally undermine the function of the area for those purposes.

The evidence of need for a studio development of this size is questionable, and the site selection process flawed.

Any economic and social benefits that might arise could be equally or better delivered on other sites.

It is a Green Belt site and represents inappropriate development as defined in national and local policy, as well as having major demonstrable impacts on openness. Given the degree of harm caused by the development, and the limited (and mostly non-site specific) economic benefits that might accrue, the ‘very special circumstances’ test for overriding Green Belt protection is not met.

In more detail:

### **Green Belt**

It is common ground that this represents ‘inappropriate development’ as defined by Green Belt policy.

The NPPF states:

“147. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

148. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.”

The Planning Statement seeks to muddy the water regarding Green Belt policy and status. We would point out that the visual quality of Green Belt, its “tranquillity” and the degree it contributes to

Green Belt purposes, are not relevant to these tests, it is “their openness and their permanence” that are the essential characteristics of Green Belt areas (NPPF para 137).

In any case, Wycombe’s Green Belt Assessment, which the applicants seek to quote from to suggest that this is low-grade Green Belt, had a very different purpose and context: it was in relation to policy (Local Plan), not an application; hence the (different) ‘exceptional circumstances’ test, for potentially using some Green Belt land by removing it from the Green Belt, was driven by another conflicting policy requirement for the Plan to seek to meet local housing / business need, i.e. for development which had to be allocated somewhere, not something that is optional.

And, even then, use was ultimately ruled out due the significance of impact, *inter alia*, through it being part of an essential gap between Marlow and Bourne End. (Green Belt Part Two Assessment - Appendix GB1: Individual Site Assessments - Steps 2 and 3)

The applicants also quote the NPPF paragraph about enhancing Green Belt land:

“145. Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.”

We suggest this actually lends greater support to the merits of the RUR4 allocation, rather than to this proposal.

#### **Status, deliverability, and applicability of RUR4**

Contrary to the assertion at 10.22ff of the Planning Statement, Policy RUR4 of the Wycombe Local Plan is NOT “largely out-of-date”, and remains current and deliverable. The Local Plan was adopted in 2019, less than 5 years ago, and therefore carries full weight, and there have been no amendments to national planning policies or guidance, or changes in circumstance, that might trigger an early review. The deliverability of Policy RUR4 was fully assessed during the Plan Examination, where “Evidence presented by the Council demonstrates its commitment to delivering and securing funding for the project”, and it was thus found to be sound (para 197 of the Examination Inspector’s Report).

Amongst the sources of funding already available or coming on stream are substantial sums from a Thames Water Pollution Fund award and S106 contributions from the Hollands Park development; plus other S106 payments, some direct investment by Bucks Council / Wycombe District Council, and some outstanding in-kind restoration and enhancement conditions attached to mineral planning permissions.

It is preposterous to suggest at 12.84 of the Planning Statement, that a passing reference to a film studio at Marlow in the Buckinghamshire Economic Recovery Plan (a document subject to minimal public engagement and no independent scrutiny) might carry more weight than an adopted Local Plan and SPDs / SPGs.

For the avoidance of any doubt, Policy RUR4 applies to the whole of the defined Allocation, including the application site (not just, for example, publicly-owned or otherwise accessible land, or land currently managed for nature conservation). And the supporting text at 5.5.20 is unequivocal about the limits this puts on development: “The whole of the area of the Little Marlow Lakes Country Park lies within the Green Belt. Development opportunities are therefore limited. By designating the area a Country Park, it further limits development opportunities to those associated with outdoor sport

and recreation, as long as it preserves the openness of the Green Belt, that further the purposes of the Country Park’.

### **Planning History of Other Studio Sites**

The examples given at 5.12ff of the Planning Statement of other studio applications all differ from the current application in one or more fundamental respect (for example an expansion or redevelopment of an existing film site, or an otherwise previously-developed site – so not a green field proposal; or of a tiny scale in comparison); so cannot be said to be relevant or provide any precedent.

### **Landscape harm**

The submitted documents acknowledge that there will be significant landscape impact from the built elements of this development. That it is in the setting of the AONB, with setting now specifically cited as a material matter in the NPPF (para 176), adds considerable extra weight to the significance of this harm.

### **Harm to Biodiversity**

Even by the applicant’s own submission, the proposals have a significant adverse impact on the ON-SITE biodiversity. Even though the biodiversity net gain (BNG) calculation indicates a 20% gain in the medium term once mitigation measures have been established, this is reliant on off-setting, but with minimal detail or assurance of how or where this will be delivered. In any case, both national guidance and local policy (including the just-adopted Biodiversity Net Gain SPD) indicate that offsetting per se should only be the last resort, once all on-site options have been exhausted.

It also seems possible that the BNG calculation has underplayed the current value of the site, for the following reason: the ecological report notes, and acknowledges the importance of, the mosaic of habitats for invertebrates in particular, and finds some invertebrate species of conservation concern. But the added value of this mosaic element, and other mosaics (for example of woodland and grassland, creating a lot of important ‘edge’ habitat) may not get appropriate recognition in the BNG scoring system, when the individual elements (woodland / scrub / grassland / urban etc) are simply totalled without any credit given for edge effects. The effect of this would be to reduce the assessed current biodiversity units, and thus the units needed to achieve net gain.

That the approach taken has arguably skewed the metric in this way, possibly inadvertently, is shown by this quote from document Biodiversity Net Gain Part 1: “It is currently proposed to retain and enhance large areas of the existing scrub / grassland mosaic within Plots 4 & 5 and enter these areas into a management regime to create habitat aligned with the S41 priority habitat ‘Open Mosaic Habitat on Previously Developed Land (OMHPDL)’. This is considered a locally relevant habitat type given the previous history of disturbance on the site, and one which delivers large biodiversity gains through the metric. Given the baseline present, the creation of OMHPDL would also require minimal intervention.....”

There are also unacknowledged risks relating to this proposed enhancement within Parcels 4 and 5, that arise from the public access that is proposed to these areas as part of the token offer of increased recreational access. If the requirements of RUR4 for “provision of publicly accessible open space, ecological and biodiversity enhancements” were being coherently applied, the public access would be focused towards less sensitive areas of the site, like the grassland areas of Plots 1-3.

Overall, therefore, the proposal fails to “evidence a thorough understanding of context” as required by Policy DM34.

### **Adverse Traffic Impacts**

The assessment that cumulative traffic impacts will not be severe is premised on a highly ambitious, and we would say totally unrealistic, Sustainable Transport Strategy, which aims:

- To reduce motor vehicle use from 84.2% to a maximum of 60% mode share;
- To increase the uptake of public transport users from 3.3% to 20% mode share; and
- To increase the uptake of active travel (Cycling and Walking) from 7.6% to 15.1% mode share.

The current mode shares are based on today’s average across the population. It seems likely that, given the travel times / places of workers’ residence suggested within the economic assessment documents, and their economic / societal make-up, that the baseline for car use of site personnel will be higher than the 84% average, making the targets even more ambitious. Real-life data from Pinewood, considered as part of their expansion proposals, supports our contention.

The transport assessment is also dependent on the delivery of various road schemes, not all of which are in the applicant’s gift.

### **Economic and Social Benefits, and Site Selection Process**

The need for such a major quantum of new studio space, and thus the deliverability, viability, and any economic benefits that may flow from this development, seems very questionable. In relation to the overall demand, trends in leisure activity and viewing habits are so volatile and fast-changing that any future projections, especially as far ahead as 2033, must be subject to a large margin of error. Additionally, so many projects in the West London Cluster are coming on stream or are potentially in the pipeline, that supply would soon outstrip any diminished demand. These new projects include one at nearby Wycombe Air Park (a non Green Belt site, allocated for business development), which does not seem to have been fully accounted for in the assessment of supply.

We have not been able to scrutinise the detail of the claimed economic and social benefits, but acknowledge there will be some. But, whatever the benefits are, these would be equally realised on other sites. And the site selection process (the “sequential assessment”) that has arrived at this site is flawed in several ways.

Firstly, the search has been confined to the West London Cluster, which the applicant deems is vital. We strongly refute the appropriateness of this approach, and note that it is specifically contrary to the recommendations of the National Industrial Strategy 2017 and Creative Industries Sector Deal 2018 which sought to “Provide a more consistent national spread of creative industries: narrowing the gap between the South East of England and the rest of the UK”, and highlighted the unequal distribution of opportunities, skills, finance and knowledge. Although these are old documents (although cited by the applicant in relation to the overall strength of the creative sector), the current “levelling up” agenda would surely take the same view. In this context, facilitating yet more concentration in the “West London Cluster” could be viewed as an economic and social disbenefit, since it might undermine this objective of growing clusters elsewhere. This excessive concentration in one place would also exacerbate the current shortage of skills the applicant refers to.

Other clusters, mentioned by the applicants, which would equally benefit from such a proposal, exist in Birmingham, Bristol and Manchester.

Secondly, the arguments made for needing a site as large as this (to achieve “critical mass”) are, in parts, circular, and contradictory to claims elsewhere: most notably, 4.7e) of the Assessment document, which says the critical mass is driven by the “need to have enough personnel on site to support the public transport offer and ensure site is sustainable in the long term” – undermining assertions elsewhere about the good existing accessibility of this site.

Thirdly, Stage 3 of the selection process, the “First Stage Site Sift”, arbitrarily (since all Green Belt has the same status) screened out all Green Belt sites EXCEPT where “development had taken place”. Even then, what was categorised as development seems fairly subjective; and then this criterion of “development had taken place” somehow gets translated in various parts of the site selection commentary and elsewhere, to being described as variously “brownfield or despoiled”, or “damaged and derelict” in what seems a further attempt to erroneously downplay the Green Belt value of the application site.

Finally, Stage 4, the “Second Stage Sift” ruled out 13 of the remaining 15 non-AONB sites for various reasons relating to current land use or allocations, conveniently overlooking the fact that the Marlow site is allocated for outdoor recreation under RUR4. Whereas Site 4 Smallford Pit, similarly allocated in a Local Plan, is rejected.

Given all these flaws and subjectivity, the supposed unique suitability of this site should carry absolutely no weight in the decision-making process.

*Submitted by Michael Chadwick, Wycombe Planning Coordinator, on behalf of the Chiltern Society*