

Supplementary Objection from Colne Valley Regional Park (CVRP) with regard to proposed development on [33] Hectares of land south of Pinewood Studios, Pinewood Road, Iver Heath, Bucks

Application ref: PL/20/3280/OA

Part 1: Introduction

1. In October 2020, the CVRP lodged an objection to the above application because of its serious concern over the adverse impact on the Regional Park and the conflict with planning policy, in particular the Green Belt (GB).
2. In December 2020, the agents for the applicants issued a “Response to consultation submissions by the Colne Valley Park Community Interest Company (and others)”. This was dismissive of the concerns raised by the CVRP and, in summary, considered that the submitted application adequately addressed the matters we raised, including its provision for mitigation.
3. The CVRP disagrees with that response and considers that various key aspects are being brushed over by the agents, including:
 - The strategic planning context
 - The extent of the harm arising from the scheme and
 - The scale of mitigation that should accompany the development if the very special circumstances’ (VSC) were to be accepted by the decision maker (whether the Council or Secretary of State).
4. The CVRP has engaged an independent chartered Town Planning Consultant to clarify and expand on its concerns to counter the Turley Associates’ response dated December 2020.
5. This document therefore supplements our October 2020 objection and is to be read alongside it.

Part 2: Strategic Planning Context to this part of the Metropolitan Green Belt and the CVRP’s position in relation to it

6. This section highlights crucially important planning considerations to the proposed development. They are rooted in the National Planning Policy Framework (NPPF) and Development Plan (DP) policies, and are relevant to an assessment of how the development performs against the long established five purposes of the Green Belt.

The beneficial side of the Green Belt and the CVRP’s role in it

7. Once GBs are defined, NPPF Para 141 calls on local planning authorities to “*plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.*”
8. The CVRP was established in 1965 with the support of a consortium of Local Authorities (including the predecessors of Buckinghamshire Council) to protect and improve this part of the Metropolitan GB, so partly fulfilling the Council’s role as set out in Para 141. The CVRP’s six objectives (set out in full in our October 2020 objection and included in Annex 1 here) mirror Para 141 – how proposed developments ‘perform’ against those objectives is a highly relevant consideration.
9. It is now well established that the natural environment and recreation opportunities provided by the Green Belt offer a critical physical and mental health resource for the wider population, as well as being a resource for wildlife. Its protection and enhancement for the long term is

fundamental to the role of the CVRP. Once that resource is lost to development, it is lost forever. This flags the importance of there being a scale of mitigation proportionate to that of the development and the harm flowing from it, something we explore in Section 3 below.

The particular sensitivity of this part of the Metropolitan Green Belt

10. The tests for assessing the potential acceptability of ‘inappropriate’ development in the GB may be the same wherever its location, but the spatial context of the part of GB the site is located in must also be factored into decision-making. It should also inform the nature of mitigation if development is to be countenanced.
11. The application site is situated next to the sub-regionally significant Black Park, but is also close to the edge of the main London urban area. It is in a particularly sensitive and vulnerable part of the Green Belt. In the strategic Green Belt review undertaken by Arup and published by former South Bucks and Chiltern District Councils in 2018, this zone was categorised as part of the coherent ‘London Fringe’ zone. The report highlighted the characteristics and sensitivities of the part of that zone around the application site, referring to:

“... a strategic arc of open spaces separating the large built-up areas of Greater London and Slough, and smaller settlements such as Iver, Iver Heath”

“...a number of narrow bands of Green Belt are vitally important in preventing merging of settlements”

“...these gaps are essential in protecting the merging of the major urban settlements of Greater London and Slough (and the smaller settlements of Iver and Richings Park) ...”

“ ... any change within this area could act to significantly compromise the role played by the Green Belt in maintaining separation between these two large urban settlements.”

12. It is no coincidence that the extent of the CVRP sits within with the ‘London Fringe’ zone in Buckinghamshire – an area that needs particularly careful attention and planning. The Park is an important area of countryside to the west of London.
13. To promote that careful attention and planning, the CVRP CIC collaborated with a number of other organisations, including the relevant local authorities, to produce the *Colne and Crane Green Infrastructure Strategy* during 2019. It provides useful guidance in how to best to address the many challenges threatening the area, and is intended to be used alongside – and to inform – Development Plans as well as to “ ... *inform both the design of development proposals and their comprehensive mitigation and planning obligations.*” It can be found here: <https://www.colnevalleypark.org.uk/project/green-infrastructure-strategy-colne-and-crane-valleys/>

Scale of land-take is relevant

14. This is not some small extension to an existing developed site, but a 33 hectare (82-acre) expansion which follows an even larger recent one by the same company, now currently under construction.
15. This is a substantial tract contiguous with other substantial areas of open land – a key factor in why it was designated as GB and CVRP. The analysis undertaken by the applicant’s agents underplays the role the site plays in this wider context.
16. It is an area that should be protected from urbanisation, substantial building forms and intensification of traffic movements. Instead, it should be promoted for agricultural/ other appropriate rural land uses, and people’s enjoyment of the countryside.

Planning for large scale change in the Green Belt, as now proposed, and the Development Plan

17. The normal and proper place for deciding whether major development should take place within the GB is the Development (or Local) Plan.
18. It is noted that the former South Bucks DC submitted a DP for Examination in 2019, which made no provision for this proposed expansion of Pinewood Studios. This DP was only withdrawn by

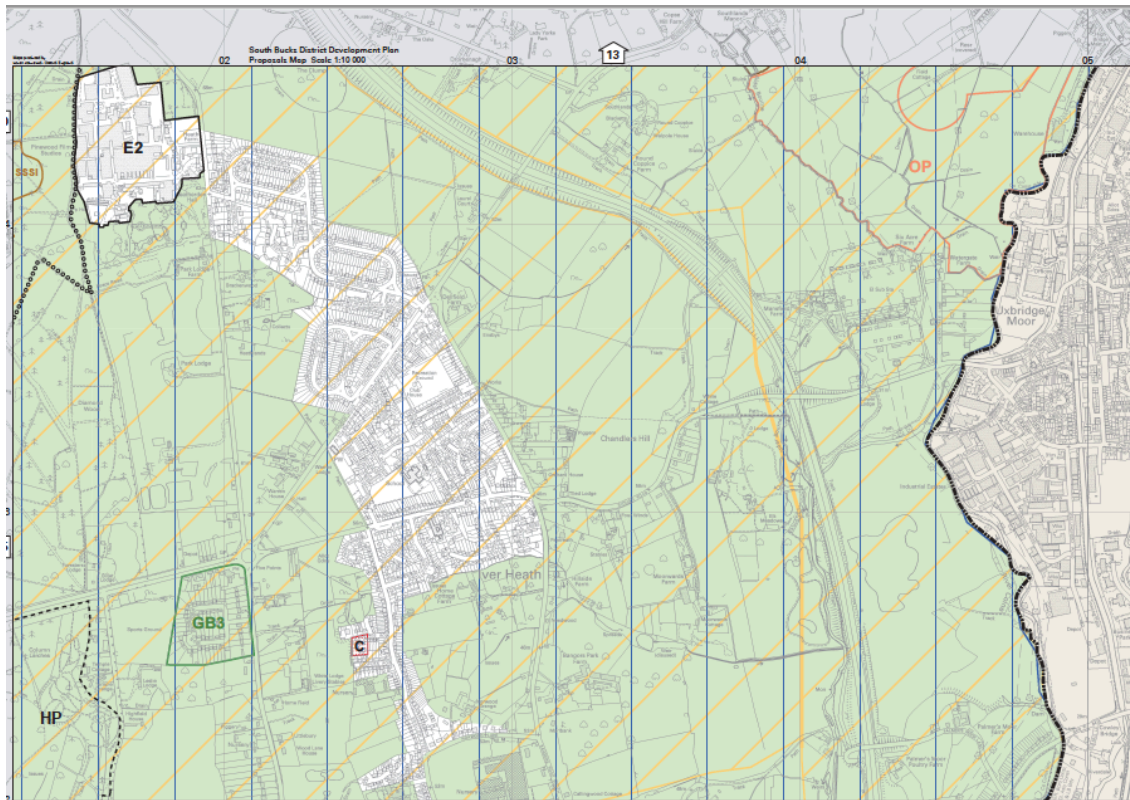
the current Council from Examination in late 2020, due to concerns expressed by the Inspectors, principally around the 'Duty to Co-operate'.

19. This is not to suggest that a planning application cannot be submitted outside that process and decided on the 'VSC' test, but equally it would not render irrelevant aspects of government policy for the GB that would need to be considered were a development of this scale and nature proposed in a DP.
20. In Turley's December 2020 response, para 2.29, it says that NPPF para 138 was written with changing GB boundaries in Development Plans in mind and dismiss it as a consideration. Whilst it may be correct to relate this NPPF paragraph to changing GB boundaries in DPs, Turley's approach is too narrow on how to manage change in the Green Belt.
21. We consider that when such a large development is proposed (and one that is in addition to the expansion approved in 2014), the implications for the Development Plan (DP) must also be taken into account. It has not been put forward as a temporary development and, if approved and implemented, a corollary would be the removal of the site from the GB in a later DP review. This is normal practice and was destined to occur in the South Bucks and Chiltern LP to 2036 (until its recent withdrawal), in relation to the expanded Pinewood Studios to the north following approval by the Secretary of State in 2014.
22. NPPF Para, 138 includes the following (our underlining):
"Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land."
23. We argue that if the decision maker in this case is minded to accept the VSC for such a strategically significant development, it is incumbent on them to consider how to foster the beneficial role of the (remaining) GB as part of offsetting the harm associated with the development. NPPF para 138 provides a framework for that in a manner consistent with the positive approach to existing Green Belts by local planning authorities, called for by government NPPF para. 141 – see paras 7-9 above.
24. Notwithstanding that view, if the application is approved we are in no doubt that national and local planning policy requires a wide approach to mitigation to offset the harmful impact and conflict with GB policy caused by the sheer scale and hugely intrusive nature of this proposed development.
25. The CVRP plays a critical role in promoting the beneficial use of the GB in this area, and would wish to be formally party to mitigation proposals should permission ultimately be granted.
26. Good planning must prevail: it would be inconceivable for key issues relating to the beneficial future of the GB and CVRP to be overlooked when an ad hoc planning application for such a major development is submitted.

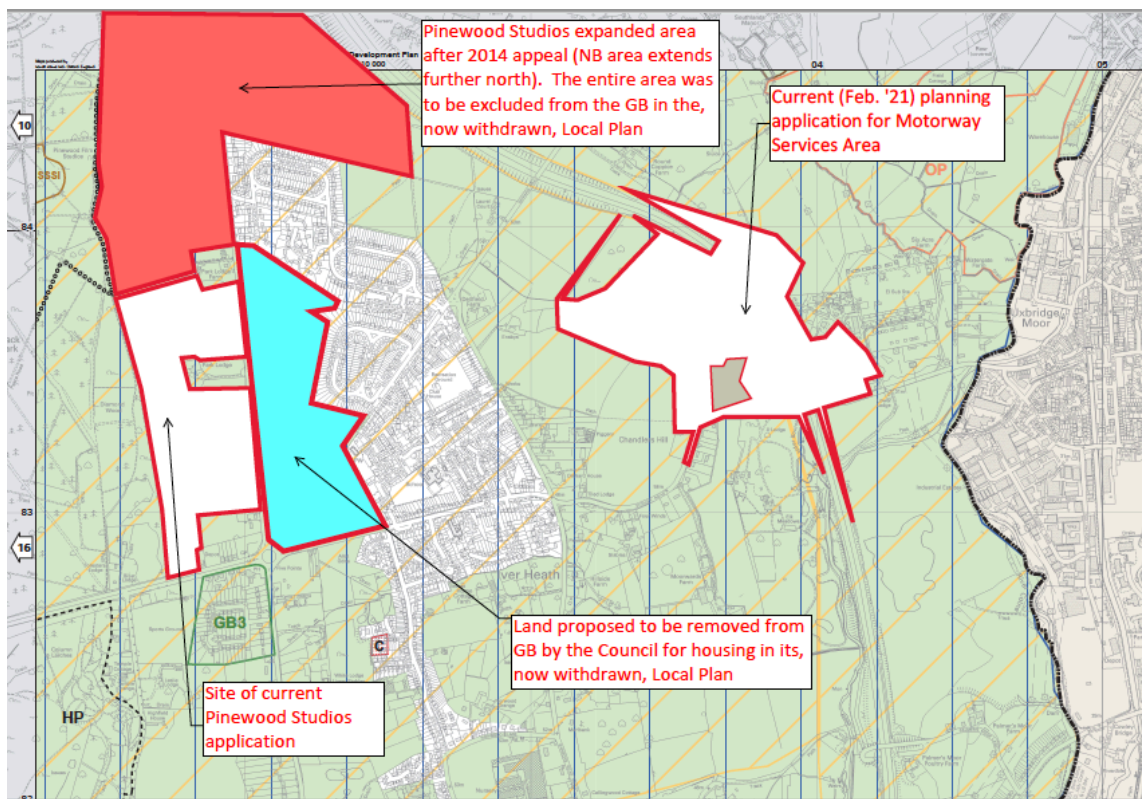
The need for a strategic view as to what is happening to this part of the Green Belt

27. Map 1 below shows the current extent of the Green Belt (from the 2011 Adopted Local Plan) whilst Map 2 shows the approximate extent of demands being placed on it.
28. It will be noted that all areas in Map 1 are within the GB except Iver Heath village, the 'established' Pinewood Studios site, and the Hillingdon urban area (also outside the Plan and LA area).
29. From that base, the CVRP is conscious the 'demands' being placed on the GB in this immediate part of the Regional Park are individually, but also cumulatively, very significant. Each 'development' has a case advanced with it for why it needs to happen in the GB. Those needs are inevitably connected with the location being near to London and its actual or perceived

economic 'pull'. Unless government policy is reversed – and there is currently no prospect of that happening – the Green Belt remains a core tool of the country's planning system.



Map 1: Extract from 2011 Adopted Local (Green Belt in green – CVRP in orange cross-hatch)



Map 2: Adopted Plan overlain with 'development' land in Iver Heath area

30. There is a point at which it is necessary to stand back, see what is going on, and take a strategic view. That point has now been reached.

31. In terms of an immediate and 'local' strategic view, the demands on the GB and CVRP shown in Map 2 comprise:
- The current proposal for Pinewood expansion
 - The Pinewood expansion allowed at appeal in 2014 (an area also proposed for removal from the GB in the Council's DP withdrawn from Examination a few months ago)
 - A current (Feb 2021) application for a Motorway Service Area on the M25 at Iver Heath
 - A large area proposed for removal from the GB to allow for future housing in the Council DP, now withdrawn from examination.
32. The current application must be seen for what it is part of. We recognise that with different proposals at different stages of the planning process it is challenging to make a cumulative impact assessment. But the Council must rise to that challenge, be proactive and implement a positive vision for the future of this increasingly threatened part of the GB, even if it is through its handling of individual applications, rather than through a DP. For the reasons we highlight above, it is an area of the GB that must not be whittled away via ad hoc decisions, only for the authorities to subsequently look back and realise what has actually happened.
33. With each significant incremental step to develop land in the GB we argue that the harm caused to it increases with each step. This is not only because of the unique large size and impact of the proposal individually, but also because it should be assessed as part of a cumulative change and deterioration to the GB from the GB baseline when it was designated. There is a point at which a part of the GB becomes so urbanised, compared with the baseline, that its integrity becomes seriously compromised. We see that the Iver Heath area is at that turning point, even if only assessed in the context of the current proposed expansion in conjunction with that approved in 2014.
34. The decision maker will scrutinise the claimed VSC. This should include assessing the degree to which they are truly 'Very Special' circumstances when arguments become repeated ones.
35. Against this backdrop and the relevant planning policies and guidance, we now clarify the specific and extensive harm arising from the development, focusing on the impact on the Green Belt and Colne Valley Regional Park, and its general sustainability in transport terms.

Part 3: Harm, in particular to the Green Belt *(with link to CVRP objectives given in italics)*

Aspects of Harm <i>(with link to CVRP objectives in italics)</i>	Examples of the Harm and comment
<p>A. Additional sprawl of the built-up areas at Pinewood and the nearby settlement of Iver Heath will occur.</p> <p><i>See CVRP Objective 2 under ‘C’ below</i></p>	<p>As is clear from Map 2 above there will be significant ‘sprawl’, both as a development on its own, but also when seen in the context of existing ‘sprawl’ from the settlement of Iver Heath (excluded from the GB) and the extent of the enlarged Pinewood Studios.</p> <p>We highlight in paras 32-39 above the wider planning context and cumulative impact on the GB to be considered. This increases the change and harm to the GB, which becomes proportionately greater with each significant addition.</p>
<p>B. The development will represent a significant step towards the merging of towns</p> <p><i>See CVRP Objective 2 under ‘C’ below</i></p>	<p>The application site lies approximately half-way between the edge of London (Uxbridge) and Slough, two large urban areas. Iver Heath and the existing Pinewood Studios (under expansion) already represent an urban break in the GB. This effectively reduces the ‘green’ space between the ‘towns’ and development of this site brings their merger markedly closer.</p> <p>The GB is intended specifically to prevent this kind of urbanisation.</p>
<p>C. There will be significant encroachment of the countryside</p> <p><i>Objective 2: To safeguard existing areas of countryside of the Park from inappropriate development. Where development is permissible it will encourage the highest possible standards of design</i></p>	<p>The size of the development will mean a significant area of countryside to the west of Pinewood Road will be lost. This is of greater importance and concern because of the already approved expansion at Pinewood Studios, now under way.</p> <p>The location next to Black Park, a sub-regionally significant countryside resource, makes this encroachment all the more sensitive.</p> <p>Additional traffic movements associated with the development and road works necessary to accommodate it will be extensive – a major encroachment on already fragile countryside ultimately leading to its greater urbanisation.</p>
<p>D. The proposal fails to assist urban regeneration and the recycling of derelict and other urban land</p>	<p>The Council/ decision maker will judge the ‘need’ for the development, and whether alternative sites could adequately meet it. However, it appears to the CVRP that because of the sheer extent of the harm, at least a significant part of the scheme (the visitor attraction) should be seen as ‘footloose’ capable of being located in an existing urban area where regeneration will be a benefit, and where accessibility by non-car modes of transport could be maximised.</p>
<p>E. Failure to promote the beneficial use of the GB</p> <p><i>Objective 1: To maintain and enhance the landscape, historic environment and waterscape of the Park in terms of their scenic and conservation value and their overall amenity.</i></p> <p><i>Objective 4: To provide opportunities for</i></p>	<p>We see nothing that materially promotes the beneficial use of the Green Belt/ CVRP, and nothing that addresses the CVRP’s objectives. We highlight the:</p> <ul style="list-style-type: none"> - Loss of Peace Path, a long established and very well used route - The proposed replacement will be inconvenient for users from the Pinewood Green area who would be required to take a long diversion along an already busy road (and one yet busier in future) - Walkers and cyclists seeking to reach Black Park would have to pass through a new urban expanse – a huge car park and large buildings. This routing completely fails to protect and enhance Black Park and its environs.

<p><i>countryside recreation and ensure that facilities are accessible to all.</i></p> <p><i>Objective 5: To achieve a vibrant and sustainable rural economy, including farming and forestry, underpinning the value of the countryside.</i></p> <p><i>Objective 6: To encourage community participation, including volunteering and environmental education. To promote the health and social well-being of benefits that access to high quality green spaces brings.</i></p>	<ul style="list-style-type: none"> - Further severance of already poor links to Black Park along the A412, resulting from the new access proposed and dramatically increased traffic associated with it - No improvements for visitors, especially by active travel modes to Black Park, Langley Park or other nearby locations in the GB - The extent of development, combined with the enlarged Studios complex, will represent a barrier block of building preventing active travel permeability for this area of countryside in the long term - A more urbanised context detracting from the setting of nearby designated heritage assets - Future agricultural use of the site will be prevented. The proposed development would not form part of the rural economy and is inappropriate for a rural location. Please reference Annex 2 which expands on the positive role of agriculture. - All in all not the enhanced countryside experience that should be a feature if this development is to proceed <p>Security issues are claimed as a reason against permeability but, in view of the importance of GB and CVRP considerations, the scheme should be designed so that attractive active travel routes across the site become integral to the layout design, and security matters dealt with in a sympathetic manner.</p> <p>The scheme needs to be re-designed to address the issues above and provide for walking and cycling routes across the site, set within attractive green infrastructure corridors. We can contribute ideas in that regard.</p>
<p>F. No clear evidence of a Net Gain in Biodiversity</p> <p><i>Objective 3: To conserve and enhance biodiversity within the Park through the protection and management of its species, habitats and geological features.</i></p>	<p>The adverse impact and pressure on nearby areas of high quality biodiversity have not been properly taken into account. This site is an important part of the wider landscape, and sits directly next to Black Park, a particularly sensitive site.</p> <p>Insufficient data has been provided to demonstrate a thorough understanding of the biodiversity credentials of the site and the impact the development would have on sensitive areas nearby. Whilst the applicant claims there will be at least a 10% net gain in biodiversity on site, insufficient information has been provided to justify this assertion.</p>
<p>G. A major loss of landscape quality and visual amenity. This is especially in terms of the rural/ countryside setting it provides to Black Park and its approaches. A key test is not the effect of the proposal on the site itself but on the surrounding area.</p> <p><i>Objective 1: To maintain and enhance the landscape, historic environment and</i></p>	<p>There are currently open views across the fields of the site from all angles – from the A412 and from Pinewood Road, but perhaps most significantly from Black Park and the historic Peace Path.</p> <p>The views are of open, agricultural type land, albeit in the latter stages of restoration after mineral workings. There is no immediate context for the huge scale of buildings proposed, and what buildings exist are occasional, small scale and discrete.</p> <p>Landscaping of the site would be incidental to the scale and extent of the proposed development. In the GB it is critical to maintain the experience of not being in an urban area and retain rural character. This would not be the case, and there will be a loss of landscape and visual amenity. Whilst buffers around the edge of the site can be included, they would be insufficient to offset the sense that the site will be developed and the loss of the open landscape.</p>

<p><i>waterscape of the Park in terms of their scenic and conservation value and their overall amenity.</i></p>	<p>The Colne and Crane GI Strategy provides guidelines to maintain open views across fields, together with conservation and management of hedgerows within an agriculturally dominant landscape. This would not be achieved.</p>
<p>H. Unsustainability of the location as a place of work and for a visitor attraction, drawing people from a wide catchment, with public transport and active travel options inevitably serving only a small proportion of trips to the site.</p>	<p>This is an inherently unsustainable location, especially for an ‘urban’ visitor attraction. The proposed shuttle bus from Slough Station is a ‘drop in the ocean’ towards sustainable travel.</p> <p>There will not be a network of safe <u>and attractive</u> walking and cycle routes connecting the site with main nearby areas of population e.g. Uxbridge and Slough – or serving the network of smaller settlements in this area.</p> <p>Recreation routes connecting the site with the wider part of the Colne Valley Park it is situated in (for example to the Grand Union Canal to south and to the east) are fragmented at best, and in many places non-existent.</p> <p>It is inevitable there will be a continuing dominance of car-reliant travel and this proposal is not located where it is or can be made sustainable, a key provision in the NPPF.</p>
<p>Overall Conclusion on Harm</p> <ul style="list-style-type: none"> • The development is inappropriate and causes major harm to the GB and CVRP, and to the purposes of their designation and objectives for their protection and improvement • It will forever change the open, rural character of the area • It will not contribute positively to the beneficial uses of this rural area, and offers no guarantee of biodiversity net gain • It represents unsustainable development, adding a great weight of traffic to this rural area • It forms part of a larger change to this sensitive part of the GB and CVRP, a creeping incursion that has to be stopped if the GB and CVRP is to retain its integrity • This raises an issue of national and regional importance 	

Part 4: Comments on Mitigation

36. For the avoidance of doubt the CVRP objects to the principle of this development because of its inappropriateness in the GB and Regional Park and the extent of harm we have outlined.
37. It also considers that even if the decision maker considers there to be a persuasive case for the development the level of mitigation proposed falls well short of what would be needed to outweigh the harm identified and fundamental 'inappropriateness' of this large development. This requires a sea change of approach and, until that is rectified, the very special circumstances test should not be considered met.
38. The applicant's agent, at para 22 of their December 2020 response, dismiss the CVRP's call for mitigation because they consider the tests of reasonableness for planning obligations not to be met. We disagree and see that the applicant/ agent is taking too narrow a view of the impacts and level of mitigation required.
39. The CVRP's objection dated October 2020 set out some areas of mitigation, as did correspondents. We summarise below the categories and general scope of mitigation needed, but it is just headlines. We have heeded the tests of mitigation being:
 - a) Necessary to make the development acceptable in planning terms
 - b) Directly related to the development; *and*
 - c) Fairly and reasonably related in scale and kind to the development
40. The sheer scale of this scheme and its impact on the GB and CVRP means that mitigation must be commensurately significant and extensive.
41. But, before this comes into play and if the scheme is to proceed further, its layout and building design must first be modified to create a 'greener', less intrusive, development. This needs to incorporate excellent permeability across the site to Black Park for walking and cycling, set within generous green infrastructure corridors.
42. The categories and scope set out below have, in part, been informed by the 2019 Colne and Crane Green Infrastructure Strategy – where this applies appropriate letters in [Blue](#) are included to cross-reference (found on pages 28-30 of the Strategy).

Area Wide Improvements to promote walking and cycling

- a) A substantial financial contribution (at least £1.75m) to go towards a fund for a programme of improvements to active travel routes that can connect the site and its vicinity with trip origins and destinations across the Green Belt quadrant between the two arms of the Grand Union Canal (south and east), the edge of Slough and the M40 to the north.
- b) We anticipate this to specifically involve improved active travel links to nearby settlements and countryside destinations e.g. Iver Heath/ Pinewood/ Black Park/ Langley Park (with new crossing(s) over the A412) and generally towards Uxbridge/ the Grand Union Canal (both arms)/ Colne Valley Trail/ National Cycle Network ([A](#)), Slough and railway stations.

Promotion of and investment in the green environment in the area around the application site

- a. A blend of identified projects and a substantial fund (at least £.75m) to be applied within the area 3km around the site (as the crow flies) and implemented within 10 years of the commencement of the use on the site
- b. Projects to include ones aimed at:
 - Landscape improvement
 - Reinstating a productive landscape ([Y](#)) in this area,
 - Farmland and other biodiversity enhancements ([S](#))
 - Developing links with the education sector ([Q](#))
 - Developing communities and friends groups ([P](#))

- Providing new and enhanced visitor experiences

Area Wide Management and Maintenance

- c. An annual fund of £25k for 25 years from commencement of the development, to fund a CVRP Countryside Management Service (P, R, X), to care for the area around the site whilst fostering community engagement.
- d. This could link to a 'green team' to add an employment/training angle (Q) and deliver on other objectives eg Biodiversity and link with partner organisations (eg Black Park, Iver Parish). It would assist with the improvement of road corridors to retain and re-create the countryside feel (Z).

Biodiversity Net Gain of at least 10%

- e. Details as agreed with the Council's Ecology Officer

ANNEX 1

Colne Valley Regional Park – Six Objectives

1. **To maintain and enhance the landscape**, historic environment and waterscape of the Park in terms of their scenic and conservation value and their overall amenity.
2. **To safeguard the countryside** of the Park from inappropriate development. Where development is permissible it will encourage the highest possible standards of design.
3. **To conserve and enhance biodiversity** within the Park through the protection and management of its species, habitats and geological features
4. **To provide opportunities for countryside recreation** and ensure that facilities are accessible to all.
5. **To achieve a vibrant and sustainable rural economy**, including farming and forestry, underpinning the value of the countryside.
6. **To encourage community participation** including volunteering and environmental education. To promote the health and social well-being benefits that access to high quality green space brings.

ANNEX 2

Farming as a key part of the beneficial side of the Green Belt and the CVRP

1. A vibrant agricultural economy is an essential ingredient for underpinning, enhancing and maintaining the Green Belt. It is one of the six key objectives of the CVRP and is particularly important where a green buffer is under direct and intense pressure from urban areas close by.
2. The Pinewood Group's argument appears to be based on a fundamental misunderstanding of the history of the site: it has always been treated and managed as a productive farm since before the gravel extraction. The planning consent for gravel extraction acknowledged and formally recognised the agricultural importance of the land, and clearly stated it must be returned to farming use on completion of the temporary mineral extraction.
3. That planning consent was granted at a time when Pinewood Studios was considerably smaller than it is today and its significant expansion (combined with the latest visitor attraction proposal) represents another step to undermine farming activity in the area.
4. There are numerous examples of enterprising agricultural techniques being used to restore former mineral sites to greater productivity. Agriculture can also underpin other access, biodiversity and landscape objectives. It is a fundamental tenet of Green Belt designation, and is the key part of what keeps the Green Belt green.
5. The Covid-19 pandemic has dramatically altered purchasing patterns, with demand now focused increasingly on local food supply, highlighting the value of a working food landscape. Once this land is gone, it cannot be used to produce food in the future.
6. The continued fragmentation of farmland poses a particular challenge for the CVRP. Speculative developers have escalated farmland values far beyond the means of normal agricultural activity. Loss of agricultural land should be mitigated by investment in other local farmland to secure its future.