President: Rt.Hon. the Lord Randall of Uxbridge Kt.PC.

Laura Peplow Planning Service Buckinghamshire Council King George V House King George V Road Amersham HP6 5AW



November 2021

Dear Ms Peplow

Re: Outline planning application PL/20/3280/OA relating to land South of Pinewood Studios, Pinewood Road, Iver Heath, Buckinghamshire, SL0 0NH – Revised information and plans (Planning Notice dated 29th October 2021)

We have reviewed the various documents and adjustments to the application and maintain our strong objections to this proposed development in the Green Belt. We refer to our objections submitted in October 2020 and February 2021.

We note that whilst there are important details considered in the revised information and plans (for example, environmental impact, air quality, biodiversity net gain, bats and reptiles, waste disposal, traffic volumes and sustainable construction) these are secondary to the fundamental issues of principle concerned with this inappropriate application.

It is necessary for the Colne Valley Regional Park and the Council to focus on the 'big picture' issues – about what this latest large development proposal means for the Green Belt at Pinewood and generally around the Ivers area. We consider that none of the additional information or adjustments to the application change those considerations, and are minor in relation to the colossal scale of this proposal.

They do not lessen the impact or significantly improve the mitigation package in any substantial way.

The fact remains that the site will be dominated by extensive urban development and the overall effect will be to greatly urbanise this part of Iver/ Iver Heath and the countryside setting of those villages and Black Park.

The argument being advanced is that those Green Belt considerations are offset by the 'very special circumstances' advanced by the applicant. However, those circumstances must be considered in the context of:

- The changes and additional development that have already been put forward (and accepted at appeal) around Pinewood Studios
- The sensitivity and fragility of the Green Belt in this locality
- The massive scale of the development and how it will draw an enormous number of people and activity into the Green Belt – both visitors and workers and their attendant needs for accommodation, traffic movements, the

Colne Valley Park Trust
Charity Registration Number: 1181303

Colne Valley Park Community Interest Company

A company limited by guarantee. Registered in England. Company No. 08131867

Registered Office: c/o Colne Valley Park Visitor Centre, Denham Court Drive, Denham,
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associated negative impact on air quality and the urbanising effect of all this on a valuable area of Green Belt

- Of great importance in considering this application is that the fundamental aim of Green Belt policy is "to prevent urban sprawl by keeping land permanently open"
- The fact that this major proposal and its consideration is all taking place outside of the development plan – the medium by which a more strategic view should be taken on the future of the Green Belt

The changed information on green infrastructure and building heights make no material difference to the overall impact this huge development has on the openness of the Green Belt – a development of some 750,000 sq feet of buildings, more than 2,300 car spaces and buildings as high as a multi-storey car park or a seven-storey block of flats.

If the Council attaches great weight to the status and importance of the Green Belt in this area it must:

- Make a stand against this huge development and recognise the strategic importance of keeping the openness of the Green Belt here
- Bring a stop to the creeping urbanisation that threatens to overwhelm the area
- See that the circumstances being put forward are not sufficiently 'special' in the context of the area and the history of expansion at Pinewood.

We believe strong co-ordination and planning for the future of the Green Belt is needed so its openness is maintained and the open land can serve its role as a green resource for public health and wellbeing, and for environmental enhancement. A strategic vision of what is happening in this section of the Green Belt is needed.

We stand by our original, strong, objections to this development, which in summary are:

- Conflict with Green Belt policy
- Harm to the rural environment and countryside character through significant urbanisation (both directly fro this development and the future pressures it will bring for more development and urbanisation)
- The inadequate provision for comprehensive and high quality walking and cycling routes in the locality and the failure to bring forward appropriate reprovision of the 'Peace Path'.
- Generally that the mitigation package¹ on offer fails miserably to mitigate and compensate for the strategic adverse impact on the Green Belt and Colne Valley Regional Park (not just individual factors that may be assessed through the EIA). This is a key issue in the planning balance.

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¹ The CVRP's previous representations refer to the need to mitigate the significant effect on the environment/ Green Belt through improvements to the surrounding countryside in the Colne Valley Regional Park, including delivery through a Countryside Management service approach and facilitating implementation of the Colne and Crane Green Infrastructure Strategy (2019).

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We trust the Council will refuse this development.
Yours truly,
Jerry Unsworth
Planning Consultant
For and on behalf of the Colne Valley Regional Park

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Addenda

Note about the Peace Path

By way of example the agents' claim that "the new Peace Path should be considered as an improvement and a benefit". This is without reasonable foundation. We note the comment by Temple Group (for BCC) that "The proposed alignment of the permissive footpath through a car park would be relatively unattractive for those people who value walking through countryside." The 'replacement' path proposed in the application takes a circuitous route around a huge car park which will not represent walking through countryside or anything close to it. The replacement path location is also significantly worse in terms of its connectivity for residents of Iver Heath to reach Black Park and it does not connect better into the rights of way network.

Note about the public consultation process

Whilst our objections relate to the development itself we also express concern at a public consultation process that has only in the last few months released publicly reports by the Temple Group that appear to date from January and November 2020. As part of preparing this response we note that new information and plans have been submitted by the agent during November 2021 including a "Screen Hub UK 'A new Peace Path – above and beyond for better access More accessible and attractive' (November 2021)". Is further public consultation to be undertaken on this additional material?

Turley criticism of CVRP objections

The applicant's agent criticises the CVRP's objections to this development in part because the CVRP has not undertaken the planning balance, weighing the benefits and case in favour of the development (eg economic growth and jobs) against the adverse impacts (particularly on the Green Belt and its openness). This 'balancing' role rests with the decision maker on the application, not the applicant or third parties. The judgment of the CVRP is that the protection of the Green Belt in this area is of paramount importance and that, as a general principle, it is a consequence of having the Green Belt that jobs and economic growth should be directed to other locations. '

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