

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

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



September 2022

Dear Sir/Madam

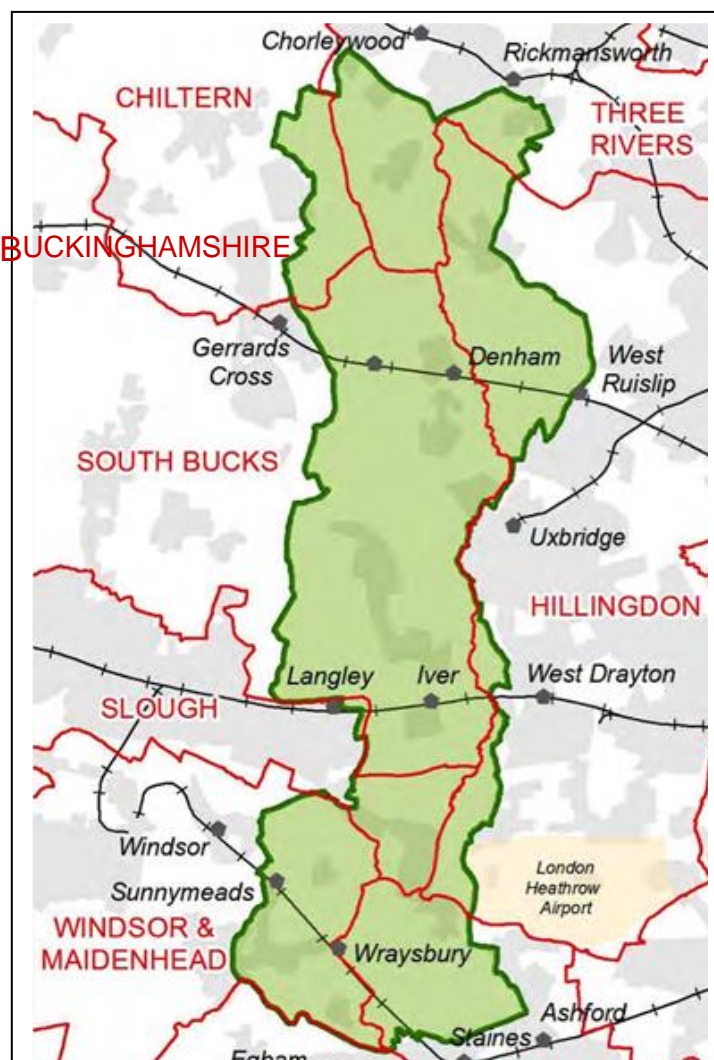
**PL/22/2657/FA**

### **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.



**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,  
Buckinghamshire, UB9 5PG  
[www.colnevalleypark.org.uk](http://www.colnevalleypark.org.uk)

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**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/green-infrastructure-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

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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.

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**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.

Jane Griffin  
Director  
Colne Valley Regional Park

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