



Marlow Film Studios

Planning Statement
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1.0 Executive Summary

- 1.1 This planning application proposes a film and television studio development which includes sound stages, workshops, offices, a studio hub, cultural/educational/recreational building, outdoor space, and infrastructure.
- 1.2 Marlow Film Studios aims to be a home of choice for the Film and Television industry.
- 1.3 The Applicant's vision is to support Buckinghamshire's continued recognition as a global epicentre for film and television production. Therefore, the scheme will be purposely designed for the industry and will become an exemplar for film studio development in the future. It will be a place of exceptional and enduring quality, an inspiring place to work, create, educate, and learn, built for a celebrated and award-winning workforce.
- 1.4 The masterplan has evolved from a carefully selected multi-disciplinary professional and public engagement process. This ensures it is sensitive to and respects its wonderful setting, is founded in the evidence of the land and respectful of its unique condition and character.
- 1.5 This film studio is looking to meet the increasing long-term demand for space in the industry and reinterpret how film studios work, offering a place where people enjoy working and learning.
- 1.6 Marlow Film Studios will provide an attractive environment and deliver an inspiring workplace focused on its occupants' health and well-being, providing easy access to nature, ecology, active mobility options, and a comfortable workplace and amenities.
- 1.7 The project's goal is to positively influence the local economy and contribute to the area's identity. It will create a hub for skills, technology, and creative people, as well as a centre for social and community life for both the film industry and local neighbours.
- 1.8 This development is an opportunity to enhance existing habitats and landscape. The project aligns with the local community's aspirations by enabling areas for biodiversity, infrastructure improvements, and increased biodiversity to the area.
- 1.9 The Site is located within the Green Belt where development would ordinarily be restricted. However, Marlow Film Studios, due to:
 - its significant socio-economic benefits;
 - the contribution it makes to meeting the current pressing need for studio space;
 - the great weight of national and local government policy encouraging this form of development in this location; and,

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- the scarcity of land within the West London film studio cluster, where the conditions are right for a film studio to thrive and survive.

Very special circumstances are considered to exist to justify Marlow Film Studios in the Green Belt.

- 1.10 Buckinghamshire Council's vision for the Wycombe planning area is that it is:
- “economically strong and the place to live, work and visit”.*
- 1.11 The Local Plan seeks to deliver this vision. Marlow Film Studios is in compliance with this vision.
- 1.12 The purpose of planning is to contribute to achieving sustainable development. This is done through an appropriate mix of economic, social, and environmental objectives. Sustainable development can be achieved in many ways. What comprises sustainable development changes over time depending on the characteristics of the development project under consideration and the specific circumstances of that time.
- 1.13 The Development Plan for this part of Buckinghamshire is the Wycombe District Local Plan. It sets out one way in which sustainable development can be achieved and this represents the starting point for consideration of any development on the Site. This does not presuppose that sustainable development cannot be achieved in other (even better ways), but rather that the case must be robustly put, through the planning process, for any deviation from the plan.
- 1.14 This Planning Statement sets out that very special circumstances exist to justify development in the Green Belt and that Marlow Film Studios will give rise to significant social, economic, and environmental benefits and that the negative aspects of the proposal are manageable (i.e., capable of being minimised through good design or mitigated to a significant extent). The benefits of granting planning permission clearly outweigh the harms. It is on this basis planning permission should be granted.
- 1.15 In this instance, the Marlow Film Studios will give rise to the following significant economic, social, and environmental benefits:

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- 1.15.1 Economic – The UK has, in recent years, become the global film making capital of the world. Between 2015 and 2020 London produced over double the number of blockbusters compared to the second largest film cluster in Atlanta. The sector generates: £4.3bn per year (2019) in annual trade surplus; £4.1bn in production spend for Television in 2021; and £19.5bn in economic activity in 2019. The Site sits at the heart of the world-renowned West London Film and Television cluster and would be perfectly placed to contribute to this globally renowned sector generating jobs and prosperity in the UK and south Buckinghamshire in particular. This will also make a significant contribution to the UK’s economic covid recovery plan.
- 1.15.2 Social –
- will deliver a Culture and Skills Academy that will provide skills, education, training, and traineeships in a growth industry, which has the potential to provide wealth and prosperity for future generations. The Culture and Skills Academy will be available for other cultural, environmental and community events.
 - Will deliver recreational space both on-site. This is a long-standing aspiration of the local community and the Council. This would contribute to the health and wellbeing of local residents.
 - Will deliver a Studio Hub that will be available at certain times for public viewings of films and other cultural events.
- 1.15.3 Environmental – Marlow Film Studios has taken the opportunities available for delivering a best-in-class studio with an exemplary architectural and environmental offer, which provides a net gain in biodiversity, achieves significant reductions in CO₂ emissions through the use of advanced construction techniques and on-site renewables, delivers the very best in sustainable urban drainage and promotes and maximises the use of alternative modes of transport to the private car.
- 1.16 The Site is located within the Green Belt and will be visible within important landscape views. It is acknowledged that these are negative aspects of the proposal. The harm to the landscape and impact on openness has been significantly mitigated through a sensitive design response (layout, massing, architecture, outstanding landscape design and engineering). Marlow Film Studios will deliver significant benefits, both locally and nationally. The benefits of the scheme amount to very special circumstances, which outweigh the harm to the Green Belt and other harms resulting from the proposal.
- 1.17 By working with the Council and public and developing a truly outstanding offer a planning balance has been achieved, where the positive aspects of the proposal substantially outweigh the negatives. Therefore, planning permission should be granted.

2.0 Introduction

- 2.1 Arrow Planning have been instructed by the Applicant to prepare a Planning Statement to assist Buckinghamshire Council (“BC”) with their determination of a full planning application on the Site (“the Site”) for the development of a new film and television studio.
- 2.2 The application Site comprises c.36ha of land which has formerly been worked for gravel extraction and the excavated areas subsequently filled with waste. The Site has been partially restored and currently has a despoiled appearance.
- 2.3 The proposal is described as:
- “Full planning permission for production space and supporting buildings for screen-based media and associated services/industries. The development comprises: 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.”*
- 2.4 This Planning Statement identifies and appraises all the relevant planning policy considerations associated with the Marlow Film Studios development, and should be read in conjunction with the other documents and drawings submitted in support of the application, including:

No.	Document	Author
	Planning application forms, certificates, and CIL forms	Arrow Planning
1	Planning Statement	Arrow Planning
2	Design and Access Statement	Prior Partners
3	Strategic Case for Development	Arrow Planning
4	Sequential Assessment	Arrow Planning
5	Economic Case	Volterra
6	Skills and Workforce Development Plan	Volterra
7	Tree Canopy Cover Assessment	Gillespies
8	Landscape Management and Maintenance Plan	Gillespies
9	Transport Assessment	Watermans
10	Flood Risk Assessment	AECOM
11	Sustainable Urban Drainage Strategy	AECOM
12	Lighting Design Strategy	AECOM

13	Arboricultural Report	Watermans
14	Utilities Statement	AECOM
15	Minerals Assessment	Watermans
16	Operational Waste Management Strategy	Watermans
17	Sustainability Statement	AECOM
18	Energy Statement	AECOM
19	Statement of Community Involvement	Soundings
20	Security Needs Assessment	AECOM
21	Agricultural Land Assessment	Simmons and Sons
22	Daylight and sunlight analysis	Waldrams
23	Light Pollution Analysis	Waldrams
24	Solar Glare Analysis	Waldrams
25	Biodiversity Net Gain	Watermans
26	Habitat Regulations Assessment	Watermans
27	Heritage Statement	Historic Landscape Management Ltd.
28	Framework Travel Plan	Watermans

2.5 Drawings (illustrative and for approval) are listed in the drawings schedule attached at Appendix 5.

2.6 The application is submitted in full. This is to ensure the quality of the submission can be fully appreciated, to provide certainty to the community and decision makers, and to hasten delivery.

Context

2.7 This Statement is prepared to assist BC in its determination of the application having regard to the requirements of the Development Plan, the Framework, PPG, and other material considerations. It evaluates the Marlow Film Studios development against local and national planning policies and carries out an overall planning balance.

Structure

2.8 The remainder of the Statement is structured as follows:

- **Section 2** – An introduction to the application, proposal, accompanying reports and Environmental Impact Assessment.
- **Section 3** – Provides an introduction to Marlow Film Studios, the location, the history of Dido Property Ltd, and the world of the film industry.
- **Section 4** – Provides an in-depth analysis of the Site and its Surroundings.
- **Section 5** – Presentation of the Site’s relevant planning history including precedents of studio applications and other relevant planning approvals.

- **Section 6** – Provides details of the Marlow Film Studios development.
- **Section 7** – A summary of the community involvement practices including Planning Performance Agreement, Design Review Panel, and Public Engagement.
- **Section 8** – A summary of the development plan policies, national policies, economic, film and screen-based media policy context, against which Marlow Film Studios will be assessed.
- **Section 9** – Provides an assessment of compliance with the Development Plan.
- **Section 10** – Provides an assessment against the Four Pillars of the project.
- **Section 11** – Provides a general development management assessment.
- **Section 11** – Provides a Green Belt assessment.
- **Section 12** – Provides Heads of Terms for a future Legal Agreement.
- **Section 13** – Provides an assessment of the overall planning balance.
- **Section 14** – Provides a summary of the planning balance and conclusion.

Environmental Impact Assessment

2.9 Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (hereafter referred to as the ‘EIA Regulations’) identifies projects where an EIA is required. The Development is not Schedule 1 development under the EIA Regulations 2017, for which EIA would be mandatory. It is however a Schedule 2 development (category 10b urban development projects), for which EIA is required where the Development is likely to have significant effects on the environment by virtue of factors such as its nature, size, and location. The Marlow Film Studios development has not been the subject of screening. On review by EIA experts the Project was considered to comprise EIA development requiring an Environmental Statement. A scoping report was submitted to the Council in July 2021. A Scoping Opinion was received from the Council on 9 November 2021.

2.10 The structure of the Environmental Statement, which accompanies the application, is as follows:

Volume 1 – Main Text

- Non-technical summary
- Chapter 1 - Introduction
- Chapter 2 - EIA Methodology
- Chapter 3 - Existing Land Uses and Activities
- Chapter 4 - Alternatives and Design Evolution
- Chapter 5 - The Development
- Chapter 6 - Development Programme, Demolition and Construction
- Chapter 7 - Socio economics
- Chapter 8 - Transport and Access
- Chapter 9 - Air Quality

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- Chapter 10 - Climate Change
 - Chapter 11 - Noise and Vibration
 - Chapter 12 - Ground Conditions, Contamination and Waste
 - Chapter 13 – Flood Risk
 - Chapter 14 - Ecology
 - Chapter 15 - Historic Environment
 - Chapter 16 - Cumulative Effects
 - Chapter 17 - Next Steps

Volume 2 – Figures

Volume 3 – Landscape and Visual Impact Assessment (LVIA)

Volume 4 - Appendices

3.0 Marlow Film Studios – The Overview

- 3.1 This section of the Planning Statement provides an overview of the drivers and vision for Marlow Film Studios and how it will become a major asset in the international film, high end TV and screen-based media industry.

The Film Industry

- 3.2 In 2020, the UK suffered the worst economic contraction in over 300 years. Despite this, the film and television industry has remained one of the most dynamic sectors in our national economy, continuing to draw in growing inward investment from overseas.
- 3.3 The UK is known internationally for our people and skills-first sectors – like financial, legal, and other service industries. 80% of our economy, and 82% of UK employment, is in the service sector. Thanks to over 75 years of technology, talent, investment and government policy, the film & TV sector has developed into one of the few trades where we can claim true global leadership.
- 3.4 As a nation the UK makes a significant contribution to global culture and entertainment. For example, a UK-made blockbuster is 3.5x times more likely to perform at the box office than one made in California. UK expertise has grown to dominate the global industry. In 2015, the UK overtook California as the world’s film capital, thanks in part to a long history of hits like The James Bond films, the Star Wars movies, and recent high end television sensations like The Crown.
- 3.5 The sector is growing at such a pace that it is set to double in size over the next 4 years (according to the British Film Commission). This growth has the potential to produce even more skilled and highly rewarding jobs, and training at both the national and local level.

Why Marlow

- 3.6 Marlow is appropriately located within the West London Cluster for film and television, the world’s most important location for producing high-budget filmed entertainment.
- 3.7 Three quarters of a century’s investment, training and advocacy have cultivated a strong local film-making tradition that has a major global impact. Classics like Brief Encounter (filmed at Denham Studios and Beaconsfield) blazed the trail.
- 3.8 Several international blockbusters have been made in the area. Dr No, the first James Bond movie, was shot at Pinewood (10 miles from Marlow) in 1962 and for the last six decades almost all the 25 Bond films were made here in South Buckinghamshire.

- 3.9 South Bucks is now the world’s most significant centre for the production of award-winning filmed entertainment. More recent titles include Mamma Mia, No Time to Die, and last year’s Marvel release, Eternals. Over 2000 films have been produced at Pinewood Studios, winning 167 Oscars and 228 BAFTAs.
- 3.10 This has led to the specialist creative and technical ancillary trades basing themselves in the area.
- 3.11 South Bucks is at the heart of a globally important ‘Industry Cluster’. The Cluster is a critical mass of unusual competitive success in a particular location, much like the City of London or Silicon Valley, which house globally significant industries that foster their own communities leading to extraordinary benefits.

Location

- 3.12 The key requirements for any site aiming to produce top-tier filmed entertainment are:
- Adequate space to create a viable site of internal critical mass for efficient working practices and the viability of training facilities and public transport;
 - Proximity to other top-tier world-class facilities, associated trades, and talent (linked to the creative industries) already in place (i.e. being located within the West London Cluster);
 - Proximity to London and associated infrastructure (i.e. Heathrow and other interconnecting transport infrastructure),
- 3.13 The map below (Fig. 1) shows the geographic clustering effect and the need for facilities to be in close proximity to one another. It is notable that the majority of sites within the Cluster are located within the Green Belt. Many are also near landscapes designated for their importance – like the Chilterns AONB.

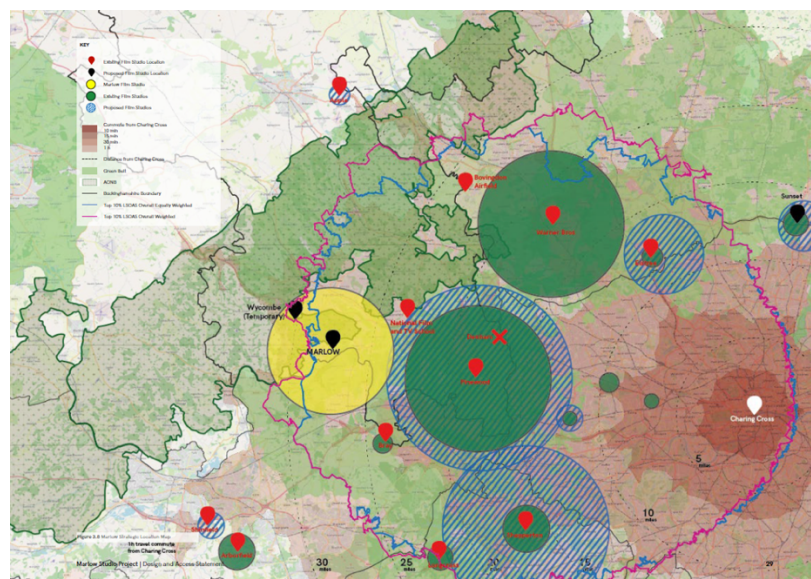


Fig 1. Strategic Location of Marlow Film Studios Film Studio within West London Cluster

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- 3.14 Taking into consideration a range of factors Marlow Film Studios is put forward, which offers the opportunity to secure the economic and social benefits of a new high-end major Film Studio whilst minimising and managing the environmental impacts in a way that no other site within the northwest London cluster can do. This is evidenced through the preparation of a Sequential Assessment, which forms part of the planning submission.

The Offer

- 3.15 Marlow Film Studios aims to be a home of choice for the high-end film and TV industry. The scheme will be purposely designed for the industry and will become a precedent for film studio development in the future. It will be an inspiring place to work, create, educate, and learn, built for a celebrated and award-winning workforce. The development would be one of the most significant infrastructure projects within the UK with a capital investment of more than £750 million.
- 3.16 This film studio seeks to meet the increasing demand for space in the industry and reinterpret how film studios work, offering a place where people enjoy working and learning. Marlow Film Studios will distinguish itself by providing a welcoming environment delivering a workplace focused on its occupants' health and well-being, providing easy access to nature, ecology, active mobility options, and an inspiring workplace and amenities.
- 3.17 The project's goal is to positively influence the local economy and contribute to the area's identity. It will create a hub for skills, technology, and creative people, as well as a centre for social and community life for both the film industry and local neighbours. Marlow Film Studios is estimated to enable the production of three £250m feature films annually.
- 3.18 The project will aim to align with the local community's aspirations by delivering quality green space, infrastructure improvements, and increased biodiversity through on/off Site interventions.
- 3.19 The guiding pillars of the Project are:
1. Economy and Training
 2. Design Quality
 3. Sustainability
 4. Ecology

4.0 Site and Surroundings

Application Site

- 4.1 The Site comprises an area of 36.34 hectares and is located within the administrative boundary of the former Wycombe District Council, now forming part of Buckinghamshire Council. The Site is identified in the plan below (Fig 2):

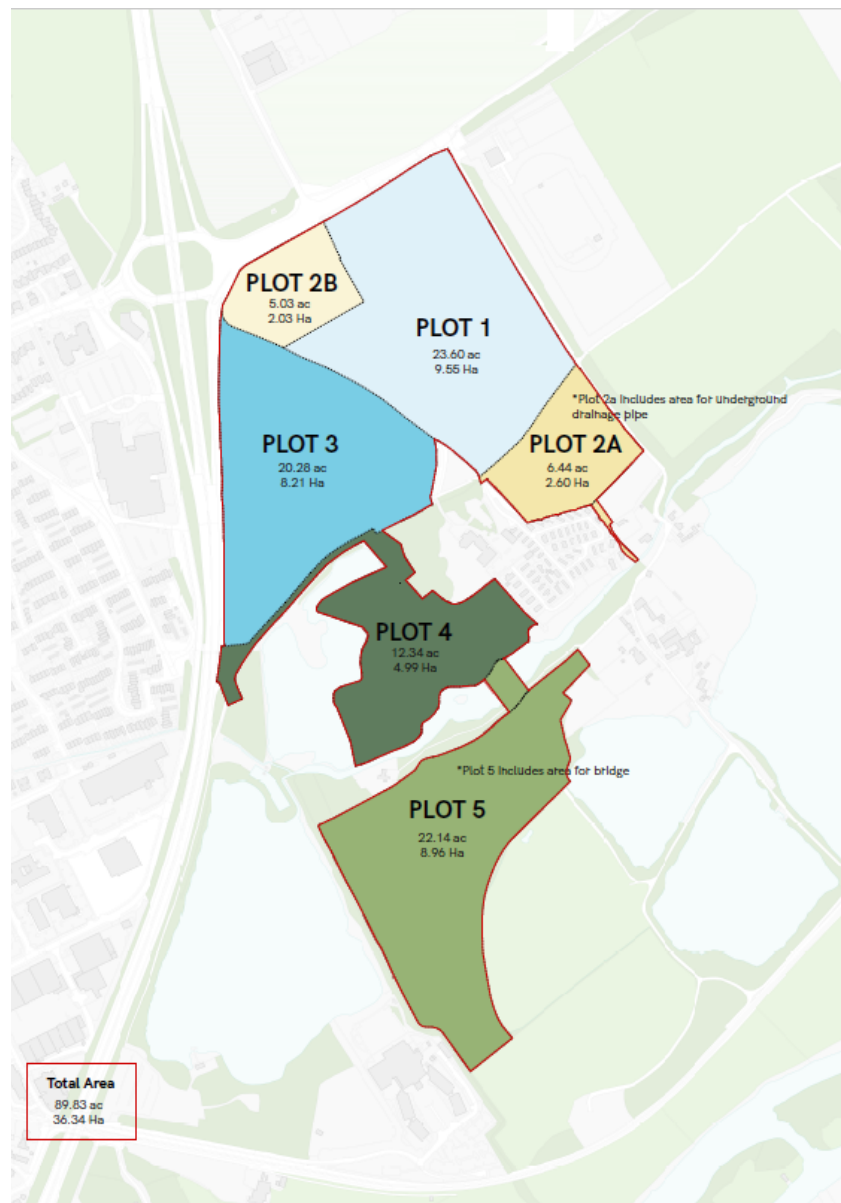


Fig 2: Plan showing Site and Plots.

- 4.2 The Site is located adjacent to Marlow in the parish of Little Marlow. It is bound by the A404 to the west, the A4155 (Marlow Road) to the north and Westhorpe Farm Lane and hedging to the east. The south-eastern boundary of the Site is bordered by a mixture of built form comprising

Westhorpe House, Westhorpe park homes and the residential development and businesses lining the southern end of Westhorpe Farm Lane. To the south of the Site (Plot 5) is the Crown Plaza Hotel with Marlow Rugby Club beyond to the southwest, the Marlow to Bourne End branch railway line and the river Thames.

- 4.3 The Site, and surrounding land, was quarried in the mid to late 20th Century for gravel extraction. The excavations were subsequently filled with waste and the land currently comprises a series of poorly restored fields, enclosed by hedging, post and wire fencing and tree belts. Several quarried areas were not filled and remain as lakes. The western edge of Plot 4, where it abuts Westhorpe Water Course are the only water bodies within the application Site. There are several spoil heaps/bunds remaining on the land. Overall, the Site, whilst technically falling within the definition of greenfield land¹, has a despoiled and unnatural appearance. The Site's history of excavation and landfill, whilst not immediately obvious from a distance is clearly in evidence on closer inspection and from aerial photography.
- 4.4 The Site area comprises 6 plots (1, 2A, 2B, 3, 4 and 5) (see Fig. 1 above). These plots have been divided in response to the current geography of the Site and in response to the proposed future land uses. For the purposes of the Site description, some plots will be considered together.
- 4.5 A description of each of the plots (or groups of plots) is detailed below:
- A. Plots 1, 2A, 2B and 3** – comprise an area of relatively open fields c.23 ha in size subdivided into small plots by fencing, bunds and sporadic/sparse hedging. The central part of the plots is set over to self-seeded scrub vegetation with some litter/rubble in evidence at the surface. Collectively these plots comprise the northern most element of the Site. The plots are located between the A404 to the west, Marlow Road (A4155) to the north, Westhorpe Farm Lane to the east and Westhorpe House, park homes and Westhorpe Water Course to the south. The drive to Westhorpe House and the park homes passes around the northern perimeter of Plot 2B and then centrally through the plots (between Plots 1 and 3) on a southeast/northwest axis effectively dividing the northern plots in two. A public right of way (ILMA/20/1) passes along the southern boundary of Plots 1 and 3. Plot 2A is located to the south of the Public Right of Way. A day care centre for dogs is located within the north-western part of Plot 3 and comprises kennels/outbuildings and an open field for dog exercising. To the south of Plot 2A is the previous walled boundary of Westhorpe House which now encloses the Westhorpe Park Homes. To the southwest of Plot 3 is Westhorpe Lake. The plot slopes very gradually from north to south (a fall of approximately 7 metres in total²).
 - B. Plot 4** – is 4.5 ha in size and located west of Westhorpe Park Homes and Westhorpe House. Woodland blocks are present along the north, east and southern boundaries of the plot. The central part of the plot is

¹ As defined in the Framework under 'Previously Developed Land' (p.70).

² Measured from land adjacent to the access (36.72) to the Public Right of Way in front of Westhorpe House (29.75).

set over to self-seeded scrub vegetation with some litter/rubble evident at the surface. Unsurfaced, tightly enclosed informal footpaths run through and around this plot. The western section of the plot encroaches on to Westhorpe Lake (a fishing lake). Westhorpe watercourse runs adjacent to the plot's southern boundary. To the north is a Public Right of Way (LMA/20/1). The plot is relatively flat.

- C. Plot 5** – is 8.7 ha in size and the most southern plot on the Site. It is located approximately 90m south of Plot 4. There is a private road running along the northern boundary of the plot, which provides access to the plot and leads on to a single dwelling (Stallworthy). Plot 5 is separated from the rest of the Site by Westhorpe Watercourse. This plot is also bound by fields and lakes to the east, and by a woodland strip (overgrown hedgerow) to the west. Beyond this woodland, and outside of the Site, lies an informal footpath and a large lake currently used for fishing. One large made ground mound, about 10m high, is located at the north-east corner of the plot. Vegetation covers the mounds with some litter at the surface. There is an abandoned single storey building that was built and used in connection with the gravel pit at the far north-east corner of Plot 5. The haul road from historic mineral workings remains in the north-eastern part of the plot, with a gated access taken from the end of Westhorpe Farm Lane.

The Wider Area

- 4.6 The Site is located immediately to the east of Marlow Town, a settlement of some 14,004³ residents with associated services and amenities including a train station (branch line to Bourne End and beyond) and high street with a range of shops and eateries. The Site is connected to Marlow Town via a footbridge (known as the Volvo Bridge) over the A404 at the southwest corner of the Site, and via the A404/A4155 roundabout at the north-western corner of the Site.
- 4.7 The Site is located within the Parish of Little Marlow. The centre of the village of Little Marlow⁴ is located approximately 0.5 miles to the east of the Site. The settlement of Bourne End is located approximately 2 miles further to the east (2.5 miles from the Site). Bourne End is a settlement of some 5,300 residents, with associated services and amenities including a train station (branch line to Maidenhead).
- 4.8 High Wycombe (the largest settlement near the Site) is located approximately 4.1 miles to the north of the Site with access to mainline rail (a 28-46⁵ minute connection to London Marylebone). Maidenhead is located 7 miles to the south of the Site with access to mainline rail and Crossrail. Mainline rail from Maidenhead provides a 17-47 minute connection to London Paddington.

³ Source: Office of National Statistics

⁴ Taken as the junction of Church Road, Pound Lane, and School Lane.

⁵ Figures taken from The Train Line on 1 Feb 2022.

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- 4.9 The Site is located adjacent to the A404/A4155 roundabout providing direct access to the M4 (8 miles to the south) and M40 (3 miles to the north).
- 4.10 The Site has good access to Heathrow (the UK's largest international airport) via public transport from Maidenhead/High Wycombe or the M40/M4. Depending on traffic these journeys would take approximately 20 minutes by car and 1:10-30 mins via public transport⁶.
- 4.11 The area immediately to the east and southeast of the Site comprises a combination of several residential and recreational uses (Westhorpe Water Sports Club and Westhorpe Open Swimming Lake) including a few small businesses. To the east of Westhorpe Farm Lane, close to the north-eastern boundary of the Site, lies Buckinghamshire Council Athletics Track.
- 4.12 Fieldhouse Lane is located to the south of the Site and provides access to Marlow Rugby Football Club, approximately 172m south of the Site, and the Crown Plaza Hotel, located to the south of Plot 5. There is currently no formal connection from the Site to Fieldhouse Lane, but a network of informal footpaths currently allows access.
- 4.13 Westhorpe watercourse runs west to east and outfalls to the River Thames at Bourne End Marina, 2km to the east of the Site. At its closest point, the Site is located approximately 300m north of the River Thames to the South.
- 4.14 There are several large lakes to the east and south of the Site, the largest of which is Spade Oak Nature Reserve.
- 4.15 The following individual buildings/uses are relevant to the Site and proposal:
- a) Westhorpe House, a Grade II listed building to the south of Plot 3 and east of Plot 4.
 - b) To the northeast of Plots 4 and 5 are several residential dwellings including 56 park homes.
 - c) Corners Cottage Grade II listed building, approximately 85m east of the Site (Plot 2A).
 - d) Globe Park Business Park, approximately 90m west of the Site on the western side of the A404.
 - e) Marlow Fire Station, approximately 100m northwest of the Site on the western side of the A404.
 - f) Hillier Garden Centre is located approximately 195m north of the Site.
 - g) Marlow Water Ski Club house is located approximately 285m southwest of the Site.
 - h) Little Marlow Sewage Treatment Works is located approximately 440m east of the Site.

⁶ Figures taken from Google Maps at 16:28 on 21Feb 2022. It is noteworthy that traffic and public transport conditions will vary. It is also noteworthy that the current public transport timing includes use of the existing 850 bus service and does not consider the proposed new bus service, which is likely to improve the public transport journey time.

i) To the south of Plot 5 is the Crown Plaza Hotel.

4.16 Further details of the existing Site and surrounds are presented in the Design and Access Statement.

5.0 Planning History

- 5.1 The planning history for the Site is extensive and principally relates to the use of the Site for quarrying. The full historic chronology for the Site is set out in Appendix 1.

Overview

- 5.2 Prior to the 1930s the Site, and surrounding land, was in use as agricultural land (rough pasture and woodland). In the early 1930s [shown on 1932 OS map] the sewage works was created on land to the east of Plot 5. From the 1950s through to the late 1990s the Site (and surrounding land) was mined for gravel (starting in the north and working south), back filled with waste and restored. The end result was land with a despoiled appearance. The final restoration (on Plot 5) was completed in the early 2000s. As the mineral activities on the Site, and land adjacent to the Site, drew to a close several isolated developments have been consented or allowed to become lawful. Therefore, while the Site is not classified as previously developed land in accordance with the Framework, it has the appearance of disturbed land that has been partially urbanised by pockets of development.

Key Planning History on the Site and in the immediate Surrounding Area:

- 5.3 The park homes were gradually established over several years with planning permissions granted from the late 1950s until the mid 1980s (ref: WR/1231/63, WR/1150/71, W/1091/77, and W/5655/83). The park homes site was last granted permanent planning consent in 1983 under application ref: W/5655/83.
- 5.4 In 1990 planning permission was granted for a 168-bedroom hotel (inc. conference/leisure facilities) on land (site of the former sewage works) to the South of Plot 5 (Ref: W/90/6708). Alternative schemes were permitted in 1998 (98/07800/FUL), 1999 (99/07142/FUL) and again in 2000 (ref: 00/07506/FUL). These consents followed several previous applications through the 1980s and 90s (WR/87/7213; W/89/6831).
- 5.5 In 2012 planning permission was granted for an athletics track with floodlighting and changing facilities on land to the east of the Site (12/06884/R9FUL). Planning permission was granted subject to several conditions and a legal agreement. The legal agreement secured a number of walk and cycle improvements on the land to the southeast of the site. The application Site can link into these improvements.
- 5.6 In 2017 planning permission was granted for a change of use of Westhorpe House from offices to 33 apartments 17/07122/FUL. The application is currently part implemented. The application included some resurfacing of the Public Right of Way within the Site's boundary.
- 5.7 In 2017 planning permission was granted for the creation of a car park providing 200 spaces (17/06833/FUL) on land to the West of Crowne Plaza

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- Hotel. The consent was temporary and required the land to be restored to its former condition by 31 January 2023. An application was made in 2020 to make the car park permanent (ref: 20/06165/FUL). The application was refused on 30 July 2021 on four grounds: 1) Green Belt harm; 2) Failure to contribute towards the Country Park designation; 3) Poor form of development in its location; and 4) Impact on ecology. The deadline for appeal passed on 30 January 2022.
- 5.8 In 2020 a prior notification was approved (under Part 4, Class E of the GPDO) for a temporary change of use of an area at Spade Oak Lake to the east of Little Marlow for use for film making purposes (20/05079/PNP4E).
- 5.9 Over the years, further planning applications have been submitted and refused/withdrawn proposing:
- Rally kart racing (92/05179/FU)
 - Construction of a golf driving range (92/06978/FUL)
 - 50 affordable dwellings on land to the west of Crown Plaza Hotel (05/05657/FUL & 06/05952/OUT).
 - Provision of a new community football facility for Marlow Football Club including: floodlit ground, 500 seat stand, club house, changing and community facilities and 157 parking spaces (05/07748/FULEA) on land comprising Parcel 1 on the application Site. A scheme for a reduced quantum of development (264 seat stadium and 124 parking spaces (Ref: 07/07535/FULEA) was also refused.
 - A solar energy park on land to the northeast of the Site and running track (15/07001/FULEA).
- 5.10 The current Proposal along with its policy context is materially quite different than anything that has gone before and therefore the earlier decisions on the Site and surrounding area are not considered to set a precedent. Marlow Film Studios is a unique offer, which takes a significantly different approach and is based on a different set of needs and demands and overcomes historic objections to development of the Site.
- 5.11 Taken in the round the planning history of the Site and surrounding area shows a pragmatic and somewhat disjointed approach to the redevelopment of this former quarry Site following the cessation of minerals and waste activities. Marlow Film Studios can address many of these concerns with a more comprehensive and ecologically sensitive approach and by aiding facilitation of the Council's recreational vision.

Relevant Planning History of other Studio Sites

Pinewood Studio – Buckinghamshire Council – PL/20/3280/OA

- 5.12 The Pinewood expansion site is in Buckinghamshire (South Bucks Planning Area) in the Green Belt adjacent to the existing Pinewood Studio. This application comprises 70,000sqm of studio space, visitor attraction, education hub and business growth hub. In line with Officer's recommendation, BC Planning Committee resolved to grant planning

permission for this development in December 2021. The Council accepted that very special circumstances existed, which substantially outweighed the harms. The benefits comprised the significant national, regional, and local economic benefits. In addition, the Biodiversity Net Gain and community benefits which flowed from the scheme were also afforded weight in the very special circumstances balance. These benefits were considered to outweigh the harm to the Green Belt by reason of inappropriateness and impact on openness (attracted substantial weight), landscape harm, impact on the setting of a heritage asset, harm to residential amenity, air pollution and loss of Best and Most Versatile (BMV) agricultural land. The Pinewood scheme is considered to have several similarities with Marlow Film Studios development justifying a similar approach. It is notable that Marlow Film Studios, in terms of community benefits (publicly accessible land and buildings) and the sustainability characteristics of the scheme, offers additional planning benefits. In addition, due to the nature of the application (i.e. full) the design quality can be fully appreciated.

Shepperton Studio – Borough of Spelthorne – 18/01212/OUT

- 5.13 Planning permission was granted for the redevelopment of the Shepperton Studio site. The site is in the Green Belt and comprises a net additional 112,849sqm of studio space. The case for very special circumstances was accepted and the substantial positive economic impacts of the development were afforded substantial weight. This application sets a valuable precedent for planning permission being granted for studio sites in the Green Belt. Marlow Film Studios offers many more planning benefits than the permitted Shepperton scheme.

Bovingdon Airfield Studios – Dacorum Borough Council – 20/03194/MFA

- 5.14 Planning permission was granted for 5,000 sqm of studio space at Bovingdon Airfield on a site in the Green Belt. The case for very special circumstances was accepted and substantial weight was given to the economic benefits and accepted demand for studio space in the area. More modest weight was given to the cessation of Bovingdon Market and Restoration of the WWII control tower. Again, this application sets a precedent for planning permission being granted for studio sites in the Green Belt. The current application offers many more planning benefits than the permitted Bovingdon Airfield scheme and is of a significantly different scale, meeting a different industry need.

Bray Studios – Royal Borough of Windsor and Maidenhead – 21/02245/FULL

- 5.15 Planning permission was granted for 30,000 sqm of studio space at Bray (9 sound stages, 4 workshops, backlot, and other ancillary features) on a site in the Green Belt. Part of the site was previously developed land part was not; taken as a whole the site was considered to represent inappropriate development. Several very special circumstances were advanced: substantial weight was afforded to the economic benefits; moderate weight was afforded to the sustainability benefits (carbon reduction and on-site energy production) and moderate weight was afforded to a biodiversity net-gain score of 11.45%. The case for very special circumstances was accepted. This application sets a precedent for planning permission being

granted for studio sites in the Green Belt. Marlow Film Studios offers many more planning benefits than the permitted Bray Studios scheme and again, is of a significantly different scale, meeting a different industry need.

Elstree Studio

- 5.16 Planning permission was granted for the development of a film/ production studios (54,391sqm) in March 2020 by Hertsmere Borough Council, on land identified for employment development. The site was removed from the Green Belt part way through the determination of the application and continues to sit adjacent to Green Belt land. Marlow Film Studios shares several similarities with Elstree Studios in terms of social, economic, and environmental benefits and therefore represents a helpful precedent.

Warner Bros Studio – Watford Borough Council & Three Rivers District Council – 15/01300/OUTM

- 5.17 Planning permission was granted for c. 75,000 sqm of studio space at Leavesden. The site straddles the Local Planning Authority boundaries of Watford and Three Rivers Council's. The part of the site that fell within three rivers was removed from the Green Belt, but not the part that fell within Watford Borough. The local, regional, and national importance of the film studio was considered to constitute very special circumstances. This application sets a valuable precedent for planning permission being granted for studio sites in the Green Belt. Marlow Film Studios offers many more planning benefits than the permitted Warner Bros Studio.

Other Relevant Planning Decisions

Hollands Farm – Buckinghamshire Council – 21/06215/OUT

- 5.18 An application for housing development (400 dwellings) at Hollands Farm in Bourne End was validated by the Council on 19 May 2021 (ref: 21/06215/OUT). The Local Plan policy requires the Hollands Farm site to provide S106 contributions to mitigate recreational impacts at Burnham Beeches SAC. These contributions are proposed to be directed to the development of the policy RUR4 recreational area. The current application, as part of a wider package of measures, including contributions from Hollands Farm and other sites, can contribute to the Council's aspiration for a recreational area in the RUR4 allocation. For reasons that will be expanded upon in section 10 of this report, this aspiration has chronic deliverability issues as evidenced by the failure, over the last 40 years, to deliver the recreational area.

Relevant Appeal Decisions

- 5.19 The following appeal decisions are also considered to be relevant to Marlow Film Studios:
- In Bolton (ref: APP/N4205/V/20/3253244) – planning permission was sought for a mixed-use commercial development (mixed B1, B2, B8, D1 and A3/4/5) in the Green Belt. The scheme was granted approval Secretary of State (the 'SoS').

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- In Wigan (ref: APP/V4250/V/20/3253242) – planning permission was sought for a warehouse scheme (27,871 sqm) and outline planning permission for a further 106,095sqm of warehousing, in the Green Belt. The scheme was granted approval by the SoS.

5.20 In both the Bolton and Wigan cases the application was called in by the SoS rather than being determined by the Local Planning Authority. Both represented “inappropriate development” in the Green Belt and required very special circumstances to be demonstrated. There was “substantial negative weight” to the landscape and visual impact for the Bolton scheme. The accepted very special circumstances cases were both centred around economic benefits and job creation. These SoS call-ins demonstrate that the right schemes are capable of being approved in the Green Belt in the right circumstances. Marlow Film Studios is considered to represent just such a scheme.

6.0 The Proposal – Marlow Film Studios

Description of Development

6.1 The formal description of Marlow Film Studios is:

“Full planning permission for production space and supporting buildings for screen-based media and associated services/industries. The development comprises: 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.”

Form of Application

6.2 The application has been submitted in full. The purpose of submitting the application in full is to:

1. Give confidence, at the initial decision-making stage, of the quality of the design.
2. To allow an accurate assessment of the impact of the development.
3. To ensure quick delivery once planning permission has been granted.

The Proposed Development

6.3 This application seeks detailed planning permission for a film and television studio comprising production space and supporting buildings at the Site. There are three principal elements of Marlow Film Studios.

- 1) Plots 1, 2b and 3 are proposed to host the main working area of Marlow Film Studios. Plot 2b (beyond the secure area) will host the main parking area and a film trade cluster at the entrance to the Site. Plot 1 will host the main arrivals hub, which will comprise a reception area and mobility hub set around an Entrance Square (see para. 7.15-16 of the DAS). This area will contain a café, cycling facilities, showers, changing rooms, creche, fitness and health facilities and will be available to employees and visiting members of the public. Beyond the Entrance Square the main working area of the studio begins. This comprises sound stages, workshops, offices, on-street parking, and other supporting structures. At the southern end of Plot 1 is the Studio Hub. This is the main focal point for the Site and for those visiting. The Studio Hub houses screening rooms, exhibition space, cafes, restaurants, and HQ office

accommodation. It is anticipated that both the main Entrance Square and Studio Hub could be configured for external events such as screenings, or other events celebrating the film industry. Both spaces offer the opportunity for events that can involve the general public. The Public Right of Way, which is proposed to include cycle provision, will be resurfaced, and widened on the alignment of the current Public Right of Way to the south of Plots 1 and 3. An additional walk/cycle route is proposed to the west of Plot 3, adjacent to the A404.

- 2) Plot 2a – comprises a mixed trade, studio, parking, and community space. To the west of Plot 2a is a community building, which is proposed to be used to serve the needs of local residents (principally the Park Homes residents). To the east of Plot 2a is a café, which will be open to staff of Marlow Film Studio and the wider public. There is also a car park on Plot 2a that will be made available for occasional public use in connection with the use of Plot 4.
- 3) Plot 4 hosts an area of publicly accessible open space⁷ to be principally used for habitat creation and quiet outdoor recreation by the wider public and occupiers of the studio complex⁸. Existing vegetation will in the most part be retained. Plot 4 will include a number of permissive paths. The Culture and Skills academy on Plot 4 is proposed to be used for a mix of cultural, educational, and recreational uses. Toilet and refreshment facilities will be included within the building. The Culture and Skills Academy will be used to host the training academy during the working week (quasi-public use i.e. educational establishment) and then used for community, environmental and recreational uses at other times (limited to a certain number of days per year). Plot 4, and its amenities, are intended to make an important contribution to the RUR4 outdoor recreation allocation, offering a landmark building whose purpose includes a wide range of public benefits encompassing culture, education, recreation, and community use.
- 4) Plot 5 hosts the backlot and large areas of land set over for the purposes of delivering Biodiversity Net Gain. The backlot is permanent space which supports temporary outdoor filming. The backlot will comprise an area of some 2.06 hectares (5.1 acres). It will be enclosed by low (1.2m) fence reinforced by a natural barrier formed using dense native thorns and other defensive planting. The surface of the backlot will comprise a mix of grasscrete in the more heavily trafficked areas (approx. 62% of the backlots area) and scalplings elsewhere. It will be serviced with potable water, electric and a data feed. Plot 5 will be accessed via a newly constructed walk, cycle, and vehicular bridge from Plot 4⁹. Sets within the backlot will be temporary in nature and will generally be less than 15m in height.

⁷ Terms of use to be set out in legal agreement.

⁸ Access to Plot 4 may need to be temporarily restricted in places to allow access to Plot 5.

⁹ The bridge will not be publicly accessible.

Quantum of Development

- 6.4 Marlow Film Studios will provide 168,718 sqm (GEA) of total gross external floor area to be used for film and television productions. The buildings will consist of:
- 43,921 sqm (GEA) (472,761 sqft) of sound stages;
 - 38,043 sqm (GEA) (409,491 sqft) of workshops;
 - 25,997 sqm (GEA) (279,829 sqft) of office accommodation;
 - 2,736 sqm (GEA) (29,450 sqft) of Studio Hub;
 - A number of ancillary buildings/structures for the film and television studio comprising entrance, reception, security offices, Mobility Hub, structures, cafes and housing for utilities/services.
 - 2.74 hectares of open space for backlots and unit bases. This includes the main backlot in Plot 5, which comprises an area of c.2 hectares.
 - A bridge linking plots 4 and 5;
 - 947 sqm (GEA) (10,193 sqft) of new cultural, educational, and recreational building in Plot;
 - 147 sqm (GEA) (1,582 sqft) new community building in Plot 2A.
- 6.5 Most of the car parking at Marlow Film Studios is proposed to be provided in two multi-storey carparks (one to the north of the Site in Plot 2B – the other to the South of the Site in Plot 2A). An additional flexible supply of parking is proposed to be provided on-street and in backlot spaces (but not on Plot 5). A total of 1117 parking spaces (+35 motor-cycle parking spaces) are proposed Marlow Film Studios. The table 1 below, which sets out the proposed parking provision on the Site:

Car Park	Standard Parking Spaces	Designated Accessible Bays	Motorcycle Spaces
North Multi-Storey	745	14	30
South Multi-Storey	304	7	5
On-Street Parking	0	47	0

Table 1 - parking

- 6.6 In addition to the car parking 272 cycle parking spaces are proposed at Marlow Film Studios. 112 of these will be in the Mobility Hub (within the main Site reception area) where ancillary facilities such as showers, changing rooms and lockers will also be provided. The remainder of the cycle parking spaces (160 spaces) will be scattered throughout the Site to maximise convenience for cyclists. In addition to cycle parking provision e-scooter parking will also be provided throughout the Site.
- 6.7 The remainder of the Site provides access, landscaping and a setting for the development, public open space, and land for biodiversity.

Access

- 6.8 Marlow Film Studios is proposed to be accessed from Marlow Road (A4155) in the same location as the current access. The existing access will be enhanced, and a signalised junction provided onto Marlow Road.
- 6.9 The alignment of the current access road, which turns west immediately after entering the site, and which provides access to the Site, Westhorpe House and Westhorpe Park Homes, will be retained but widened to allow for larger vehicles associated with Marlow Film Studios. Lighting and pedestrian footpaths will also be provided.
- 6.10 Most of the studio traffic will not follow the current access road but travel straight on into the main body of the Site where the reception, car park, Mobility Hub and security facilities have been located.
- 6.11 Access to Plot 4 will be provided via Plot 3. Access to Plot 5 will be provided via Plot 4 via a newly constructed bridge. Following community feedback determining the preferred backlot location, the bridge has been included to provide access to Plot 5, to facilitate the relocation of the backlot. The existing access to Plot 5 via Westhorpe Farm Lane shall only be used for occasional purposes.
- 6.12 Within the main production clusters (Plots 1 & 3) vehicular accesses will be limited. Occupiers and crew using the film studio will be expected to move around the Site on foot, by e-scooter or cycle. The access arrangements and street typologies have been designed to encourage walk, cycle, and e-scooter use, whilst ensuring service and larger vehicles can also safely manoeuvre when necessary.
- 6.13 The Public Right of Way that traverses the Site from east to west will be retained on its current alignment. It will be widened so that is capable of accommodating walk, cycle and active mobility. The surface will be improved to ensure it is suitable for the greater intensity of use.
- 6.14 The grounds within Plot 4 will be set over to enhanced open mosaic habitat. The perimeter of the plot will comprise a mixture of retained and enhanced woodland. A permissive path will be retained around the perimeter of the plot. Additional permissive paths (mixture of surfaced and more informal mown paths) and accessible quiet green spaces will be created within and through the habitat areas. The Plot will be subject to a management plan.
- 6.15 Financial contributions are proposed towards the delivery of improved access to the formal and informal footpath and cycle network in the Marlow area. This could include a link to Fieldhouse Lane and from there onwards to Marlow station.
- 6.16 A public transport hub is proposed to facilitate improved bus connections north to south between High Wycombe and Maidenhead and east/west between Bourne End and Marlow, and act as a modal interchange with cycling and e-scooter facilities to encourage travel by means other than the private car. This is located at the Mobility Hub near the Studios' entrance.

Layout

- 6.17 The development is concentrated in the northern Plots on the Site. Plots 1 and 3 provide the main production spaces hosting sound stages, workshops, offices, unit bases and small backlots. Plot 1 also provides the welcome/reception point and studio hub. Plot 2a hosts offices, workshops, a secondary multi-storey car park. Plot 2b provides workshop space and the main multi-storey car park. Plot 4 is intended to be publicly accessible on a permissive basis and provide ecological open space for the new cultural, educational, and recreational building. Plot 5 contains the main backlot for the Site and one of the main on-Site areas for Biodiversity Net Gain.
- 6.18 The general arrangement of buildings on the Site is set out in a grid layout with the access to Westthorpe House and Westthorpe Park homes traversing diagonally through the grid. The Site broadly divides into two main production spaces located within Plots 1 and 3. The Studio Hub provides a focus for work gatherings servicing the needs of crew and filmmakers, including food and beverage on the Site, but also enjoys access to the Public Right of Way for occasional public access/events.
- 6.19 The grid layout reflects the operational demands of the development, with the need to be able to move large pieces of equipment from workshops to soundstages. It also provides for an efficient use of the land.
- 6.20 Larger buildings, such as soundstages, are located centrally within the Site with smaller workshop buildings located around the edges to soften the impact of the development when viewed from surrounding land.

Appearance and Form

- 6.21 Different design approaches have been adopted for different building types (i.e. sound stages, workshops, car parks and community buildings). Full design details of the individual building types are set out in the Design and Access statement.
- 6.22 Green roofs are proposed for the soundstages to assist with visually assimilating the buildings into the landscape and delivering ecological value and contribute to slowing the rate of water run-off.

Landscaping

- 6.23 Marlow Film Studios seeks to achieve a campus style. The northern part of the Site will take a more formal and managed approach to landscape provision with a more natural approach being adopted in the southern parcels. With the exception of the grassland across Plots 1, 2 and 3, existing vegetation will, in the most part, be preserved and enhanced; in particular the Poplar trees adjacent to Marlow Road, and wooded tree belts enclosing Plot 4 and the mosaic of habitats on Plots 4 and 5. Marlow Film Studios will be enclosed on its perimeters with treed landscape buffers which, once mature, will filter views into the Site and soften the hard form of the development. The central spine of landscaping will also be provided on the approach road to Westthorpe House as well as around the Public Right of Way. Fingers of green in the form of street trees, street shrub planting,

green walls and green roofs will reach into the more central areas of the Site. The landscape strategy for the Site will be fully integrated with the SUDs and ecology strategy for the Site to ensure the maximum benefit of these three strategies. Plots 4 and 5 will form the main focus of the naturalised landscaping maintaining both the existing newly established woodland and the mosaic of scrub habitats.

- 6.24 Full details of the landscape strategy are set out in the Design and Access Statement (Section 8) and Illustrative Master Plan. The associated Ecological Strategy and Sustainable Urban Drainage Strategy is set out in Chapter 15 of the Environmental Statement and the Flood Risk and Drainage Strategy.

Implementation

- 6.25 The planning application has been submitted in full. The applicant controls the land - there are no land ownership constraints to delivery. Dido Limited is a vehicle that has been created for the purpose of delivering Marlow Film Studio. This will allow the development to be implemented (by the applicant) as soon as practicable following in the grant of planning permission. The proposed timeline for delivery Marlow Film Studios is set out below in Fig 3 below. Further detail on the phasing strategy is set out in Chapter 6 of the Environmental Statement.

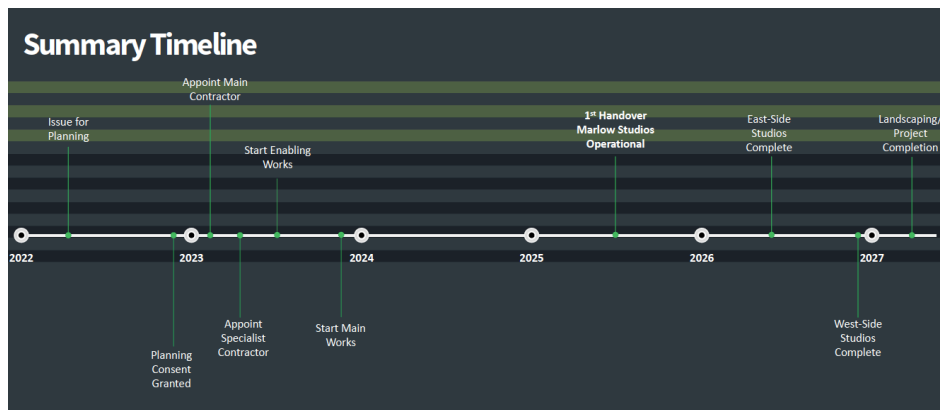


Fig. 3 Summary Timeline to Delivery.

- 6.26 As a consequence of the proposed speed of delivery, the benefits flowing from the scheme will be realisable in the short to medium term.

7.0 Community Involvement

7.1 Paragraph 133 of the Framework states:

“Local planning authorities should ensure that they have access to, and make appropriate use of, tools and processes for assessing and improving the design of development. These include workshops to engage the local community, design advice and review arrangements, and assessment frameworks such as Building for a Healthy Life. These are of most benefit if used as early as possible in the evolution of schemes, and are particularly important for significant projects such as large scale housing and mixed use developments. In assessing applications, local planning authorities should have regard to the outcome from these processes, including any recommendations made by design review panels.” (Emphasis Added)

7.2 An extensive range of consultation has taken place in the 12 months leading up to the application submission comprising:

- a) Local Planning Authority engagement;
- b) Engagement with statutory consultees;
- c) A three-stage design review process with Design South-East;
- d) Four formal public engagement events and many in-depth liaison group meetings among a range of different community, interest, and education groups; and,
- e) Close Neighbours Forum and Community Liaison Group.

7.3 Through a process of Community Involvement Marlow Film Studios has been optimised to meet both the needs of the applicant and third parties in so far as this is practicable. In accordance with the provisions of paragraph 133 of the Framework the local planning authority should have regard to the outcome of these processes, in particular the recommendations made by the Design Review Panel.

PPA and Consultation with Statutory Consultees

7.4 The scheme has been subject to pre-application discussions arranged through a Planning Performance Agreement (‘PPA’) addressing issues relating to masterplan approach, highways matters, landscape, ecology, the historic environment, neighbour impacts, and sustainability. The Council was first approached in March 2021. The PPA discussions were focused on a series of meetings in Q3/Q4 2021, and Q1 2022. The PPA was actioned alongside the Design Review Panel process, which focused on design matters.

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- 7.5 Formal discussions with statutory consultees (National Highways, Natural England, Environment Agency, Historic England, and Thames Water) have been undertaken separately. In addition, an EIA scoping request was submitted to the Local Authority in late July 2021, with a Scoping Opinion received in November 2021.
- 7.6 The output from the PPA process will be addressed on a topic-by-topic basis in Section 8 of this report.

Design Review Panel

- 7.7 To ensure the highest design and scheme quality, Marlow Film Studios has been subject to a three-stage design review process with Design South-East ('DSE'). DSE is a group of independent, multidisciplinary construction professionals working in the field of the built environment. The purpose of the design review was not to establish whether Marlow Film Studios was deserving of planning permission, but rather to determine what improvements could be made to the scheme so that it was as good as it could be for the public who would experience it. The Council were invited to, and participated in, every stage of the Design Review process.

Stage 1 – Location and Masterplan Approach – 11 November 2021

- 7.8 In the first stage review the following key topics were considered:
- 1) Strategic context
 - 2) Design Strategy
 - 3) Movement and Connectivity
 - 4) Landscape
 - 5) Site Layout and Security
- 7.9 The review panel expressed the following key views about the strategic context of the development:
- 1) they understood the logic of a film studio in this location as part of the West London cluster;
 - 2) they understood the potential the Site had to bring wider employment opportunities and public transport improvements;
 - 3) they understood the proposal would lead to the loss of an area of countryside in the Green Belt and extend the built form beyond the A404. There was nevertheless an opportunity to make the Site special and interesting.
- 7.10 The DSE were broadly supportive of the design strategy and approach and made the following key recommendations:
- 1) Carry out further Landscape and Visual Impact Assessment analysis to inform a detailed understanding of the broader landscape context;
 - 2) Describe how the Marlow Film Studios will impact, and respond to, the landscape and ecology from a macro to micro-scale.
 - 3) Explore how the east-west footpath relates to the Site's internal conditions and edges.

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- 4) Clarify how the benefits of this route may offset landscape harm.
 - 5) Explore and define how the residential road can be welcoming and interesting for residents whilst maintaining security.
 - 6) Interrogate the secure line to ensure it functions effectively whilst maintaining a sense of openness in appropriate locations.
 - 7) Explain further the transport modal split and the justification behind the targets, describe how the shift will be delivered and accommodated by the design.
 - 8) Develop the Site's edges and entrances, consider the experience of navigating the Site from multiple perspectives and routes and secure a strong landscape edge condition that is not eroded by production use.

7.11 DSE's recommendations were reflected on, and the scheme modified and updated to address the issues raised. The second Design Review Panel (Detailed Architectural Approach) took place on 2 December 2021.

Stage 2 – Detailed Architectural Approach – 2 December 2022

7.12 In the second stage review the following key topics were considered:

- 1) Design Strategy
- 2) Landscape
- 3) Movement and Connectivity
- 4) Site Layout and Security
- 5) Architecture
- 6) Materials and Detailing
- 7) Energy Strategy

7.13 DSE were broadly supportive of the design approach, but raised the following key recommendations:

- 1) Clarify the location of the secure line.
- 2) Describe in detail the treatment of the secure line, showing the types of enclosure that may be used and how these will impact different spaces.
- 3) Set out a strategy for servicing and storage to demonstrate that the Site will be able to function effectively within its tight footprint.
- 4) In conjunction with the Highway Authority, show in detail how the transport mode shift targets will be delivered, and explore how they might be financially incentivised.
- 5) Rethink the design of the hub building, exploring how this building can be celebratory, semi-permeable, and contextually responsive.
- 6) Ensure the wider ecological context informs the landscape strategy across the Site.
- 7) Present further, panoramic views of the scheme including Marlow, at night as well as day.
- 8) Explain the use and configuration of the backlot, its impact and mitigation.

7.14 DSE's recommendations were reflected on, and the scheme modified and updated to address the issues raised. Whilst the design review process had

initially been viewed as a 2-stage process it was decided that a third stage would be beneficial to address the outstanding issues, particularly regarding the location and nature of the secure line, a rethink of the Studio Hub building and review of the landscape and ecological strategy. The third Design Review Panel took place on 7 April 2022.

Stage 3 – Round-up of Outstanding Issues – 7 April 2022

7.15 In the third stage review the following key topics were considered:

- 1) Strategic Context
- 2) Landscape
- 3) Site Layout and Security
- 4) Architecture

7.16 DSE were broadly supportive of the additional work undertaken. In particular, they took the view that the hub building had been markedly improved and now has a more logical relationship with the studios and the public right of way. DSE made the following key recommendations:

- 1) Situate the scheme within its wider landscape context
- 2) Describe how the development could support, not preclude, the country park vision.
- 3) Provide the local authority with as much detail as possible regarding the user experience using drawings, visuals, and sections.
- 4) Reconsider the treatment of the external staircases and their colouration. Consider how wayfinding can be incorporated more sensitively and subtly on site.
- 5) Rethink the public art opportunity, and give greater attention to how it will be viewed and where from and whether art could instead be incorporated into the building facades.
- 6) Ensure the landscape can be adequately maintained, and that there is sufficient capacity on-site – perhaps through the inclusion of a maintenance compound.
- 7) Review the café’s location and strengthen its relationship with the hub building

7.17 Following the final review, the team reflected on the comments received. The Design and Access Statement was prepared to reflect and explain the proposals: relationship with the landscape; the contribution that Marlow Film Studios would make to the recreational use of the land; a plan was prepared for the maintenance of the land; and the rationale for the location of the café on Plot 2a was set out.

Public Engagement

7.18 Paragraph 132 of the Framework states:

“Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about

the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests.

Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.” (Emphasis added).

- 7.19 The applicant has worked very closely with those who are likely to be affected by Marlow Film Studios to evolve the designs and take account of the views of the community. Specifically, feedback from the public has led to:
- a) the relocation of the backlot from Plot 4 to Plot 5 and adding the bridge to enable the move and limit neighbour disturbance as it was considered to more appropriately preserve the biodiversity value of the Site and maximise the amenity value of the recreational land for local residents and the wider public, as well as minimise the potential for near neighbour disruption.
 - b) the redesign of Plot 2a to reduce potential impacts on the residents of Westhorpe House and Westhorpe Park Homes.
 - c) The community benefits offer which is proposed to be secured via condition and as part of the accompanying legal agreement. Community benefits that flowed from the public engagement exercise include the provision of a dedicated community facility on Plot 2A and a public transport offer which has been designed not only to meet the needs of the development but also provide benefits to the wider community.
- 7.20 In May 2021, the Applicant, commissioned Soundings to independently deliver an extensive public consultation and engagement programme, from the earliest stages of this project up to the submission of a planning application. Feedback from the local community and interested stakeholders was taken across four stages of engagement and has fed directly into the masterplan, architectural designs and other key workstreams including transport strategy, ecology, sustainability, and additional community benefits.
- 7.21 The engagement programme included four primary stages of in-person and digital engagement:
- Stage One: Taking Soundings;
 - Stage Two: The Emerging Masterplan;
 - Stage Three: Draft Architectural Design;
 - Stage Four: The Final Plans.

Across these four stages, engagement has been made up of physical and online exhibitions, group meetings, community presentations, door-

knocking, and walkabouts around the Site. The primary communication tools were a dedicated website updated regularly, leaflets and newsletters, emails, posters and flyers, information packs, and letters. A local shop on Marlow High Street (6 Liston Court) was leased from July 2021 until April 2022 to allow local people to drop in, view the main consultation boards and discuss any concerns they may have with members of the professional and Applicant team. The scale of stage 4 of the project and the need for additional exhibition space, meant that Liston Court was no longer suitable. This coincided with the shop being leased to a third-party for more permanent purposes.

- 7.22 There were over 500 attendees at the various events across the first three stages. Newsletters and invitation flyers were received by over 12,000 people digitally and physically, whilst over 300 completed feedback forms were received. Two key groups were formed at Stage One: the Community Liaison Group; and the Close Neighbours Forum. To date there have been 10 meetings of both groups. In addition, various meetings have taken place with local Parish Councils, including Little Marlow and Marlow Town Council, local community and interest groups and individuals within the community.
- 7.23 Feedback has been taken from the public, with most of the feedback coming from people living or working in the locality, and from Close Neighbours. The Close Neighbours are categorised as those living closest to the Site in Westhorpe Park Homes, Westhorpe Farm Lane, Westhorpe House and Pump Lane South. Feedback from both the public and Close Neighbours has shaped the plans and designs in several ways influencing the overall planning package. Feedback from Close Neighbours has also been used by the project team and designers to try to minimise the impact of the development as much as possible, mitigate the effects and provide opportunities for identified local community benefits.

8.0 Planning Policy/ Guidance Context

- 8.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (the ‘Act’) requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan is defined in law as comprising the Development Plan ‘as a whole’ rather than every Development Plan policy in isolation. This recognises the need for flexibility in planning and for one planning benefit to be capable of outweighing another. Other material considerations can be very wide and have a significant influence upon decision making. However, such considerations are not all afforded the same weight which is an important distinction given the planning balance that must be drawn. This Statement deals with the matter of planning balance and weight.
- 8.2 In addition, section 70(2) of the Town and Country Planning Act 1990 (as amended) states that in dealing with planning applications, the authority shall have regard to:
- (a) the provisions of the development plan insofar as they are material,
 - (b) any local finance considerations, so far as they are material to the application,
 - (c) any other material consideration.
- 8.3 On this basis, and having regard to Section 38(6) of the Act, the key issues to be considered in determining the planning application are:
- a) whether the proposals accord with the development plan when read as a whole; and,
 - b) if not, whether there are considerations which indicate that the application should be determined otherwise than in accordance with the plan e.g. this includes an assessment of whether the proposals accord with the policy and guidance of the National Planning Policy Framework (and other Government policy), and as part of this assessment;
 - c) whether the proposals would amount to sustainable development as defined in the National Planning Policy Framework
- 8.4 These matters are considered in the following chapters of this Statement and draw upon the technical information and evidence base contained in the key documents accompanying the planning application.

Development Plan

- 8.5 The Development Plan is the starting point for considering any application. The Site is located within the administrative area of Buckinghamshire Council, a Unitary Authority created in April 2020. At present the Development Plan for Buckinghamshire Council is divided into four separate areas based on the historic Local Planning Authority boundaries. The Site sits within the Wycombe area of Buckinghamshire and therefore is subject to the

Wycombe District Local Plan. The relevant parts of the Development Plan are therefore:

- 1) Wycombe District Local Plan (adopted August 2019);
- 2) Delivery and Site Allocations Plan (adopted July 2013); and,
- 3) Buckinghamshire Minerals and Waste Local Plan (2016-2036).

8.6 Relevant Development Plan policies are set out Appendix 2 and addressed in detail in Section 9 of this Statement.

Relevant Designations

Site Designations

8.7 The Site is located within the Green Belt:

- Policies CP8 (Protecting the Green Belt) and DM42 (Managing Development in the Green Belt).

8.8 The Site is within a significantly wider allocation for outdoor recreation. This is part of the Council's policy to provide for the possibility of creating a country park:

- Policy RUR4 (Little Marlow Lakes Country Park)

8.9 Plot 5 is located within an area designated as part of the wider Little Marlow Gravel Pits Biological Notification Site:

- Policy DM13 (Conservation and Enhancement of Sites, Habitats and Species of Biodiversity and Geodiversity Importance).

8.10 Plots 4 and 5 fall within the Green Infrastructure Network designation:

- Policy DM11 (Green Networks and Infrastructure).

8.11 Plots 1, 2A, 2B, 3 and the majority of Plot 4 are located within flood zone 1. The lakeside fringes of Plot 4 (southern and western) and all of Plot 5 are located within flood zones 2 and 3. Flood zone 3 is focused on the lake margins and Westhorpe Water Course¹⁰.

8.12 A Public footpath (Ref: LMA/20/1) traverses the Site from east to west to the south of Plots 1 and 3.

¹⁰ It will be demonstrated through the use of an up-to-date topographic survey that the flood zones identified in the Strategic Flood Risk Assessment and Environment Agency maps are not up-to-date. The majority of Plots 4 and 5 in fact have flood risk characteristics more akin to Flood Zone 1. This is owing to the historic infilling after gravel working to a more elevated level above the flood data baseline.

Nearby Land Use Planning Designations

- 8.13 To the north beyond the Marlow Road (A4155) and outside of the site, the landscape is designated as part of the Chilterns AONB:
- Policies CP10 (Green Infrastructure and the Natural Environment) and DM30 (The Chilterns Area of Outstanding Natural Beauty).
- 8.14 To the south of the Site (approx. 285m) is the River Thames and Thames Path National Trail.
- 8.15 To the northeast of Plot 4 is Westhorpe House. To the south of Plot 2A is Corners Cottage. Both are Grade II listed buildings.
- Policies CP11 (Historic Environment) and DM31 (Development affecting the Historic Environment).
- 8.16 Chiltern Beechwoods Special Area of Conservation (SAC), Bisham Woods Site of Special Scientific Interest (SSSI) and Bisham Woods Local Nature Reserve (LNR) are approximately 790m south of the Site. Cock Marsh SSSI, is located approximately 985m southeast of the Site.
- Policies CP10 (Green Infrastructure and the Natural Environment) and DM13 (Conservation and enhancement of sites, habitats and species of biodiversity and geodiversity importance).
- 8.17 To the west of the Site is Globe Park industrial area.
- Policies CP5 (Delivering Land for Business) and DM28 (Employment Areas).
- 8.18 Approximately 0.6 miles to the east of the Site is Little Marlow Conservation Area.
- Policies CP11 (Historic Environment) and DM31 (Development Affecting the Historic Environment).

Other Considerations

National Planning Policy Framework

- 8.19 The latest version of the National Planning Policy Framework was published in July 2021 and therefore post-dates the Local Plan¹¹.
- 8.20 Paragraph 7 of the Framework states that “the purpose of the planning system is to contribute to the achievement of sustainable development”. In the following paragraph, framework refers to three overarching objectives for sustainable development as: economic, social, and environmental.

¹¹ Local Plan Adopted August 2019

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- 8.21 These objectives should be delivered through the preparation and implementation of plans and the application of policies in the Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account to reflect the character, needs and opportunities of each. The Framework (Para. 12) makes clear that “*Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed*”. In this case there are material considerations that indicate there should be a departure from the Development Plan.
- 8.22 Para. 38 of the Framework makes clear that “*Local planning authorities should approach decisions on proposed development in a positive and creative way. They should **use the full range of planning tools available**, including brownfield registers and permission in principle, and **work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area**. Decision-makers at every level should seek to **approve applications for sustainable development where possible**” (emphasis added). Marlow Film Studios represents sustainable development. With the proper use of the planning tools available planning permission should be granted.*
- 8.23 Section 6 of the Framework (Building a Strong, Competitive Economy) states that:
- “planning policies and decisions should help create the conditions in which business can invest, expand and adapt. **Significant weight** should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to **build on its strengths**, counter any weaknesses and **address the challenges of the future**. This is particularly important **where Britain can be a global leader** in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.” (para. 81) (emphasis added)*
- 8.24 The Framework references the Government’s Industrial Strategy in this regard, where the priority of growing the Creative Industries is a key target.
- 8.25 Para. 82 of the Framework requires planning policies to “be flexible enough to accommodate needs not anticipated in the plan”, and to “enable a rapid response to change in economic circumstances”. The extent of need to accommodate a Film Studio of this scale was not known or anticipated at the time the plan was prepared (having been submitted for examination in March 2018) and the post COVID economic recovery is an economic circumstance requiring a rapid response.
- 8.26 Para. 83 of the Framework sets out that “decisions should recognise and address the specific location requirements of different sectors. This includes making provision for clusters or networks of knowledge and data driven, creative or high technology industries”. Marlow Film Studios is part

of the creative industry and has specific locational requirements which necessitate it being located within the West London Cluster. The Framework requires planning decisions to have regard to this.

- 8.27 The Framework reiterates previous national policy relating to the Green Belt and confirms (at paragraph 144) that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. Paragraph 143 confirms that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.
- 8.28 Paragraph 144 confirms that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, and that very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.
- 8.29 The Framework contains guidance on several other themes. Those relevant to this application are:
- Promoting sustainable transport
 - Requiring good design
 - Meeting the challenge of climate change, flooding, and coastal change
 - Conserving and enhancing the natural environment
 - Conserving and enhancing the historic environment

Central and Local Government Policy

National Industrial Strategy 2017 and Creative Industries Sector Deal 2018

- 8.30 The UK government published its industrial strategy in 2017. The strategy set out several objectives with the aim of helping businesses to create better, higher-paying jobs, boosting productivity in the process.
- 8.31 Within the industrial strategy, the UK's strength in the creative industries was noted, being referred to as a "world-class" industry that was growing at twice the rate of the whole economy¹². The film and television sector is one of the UK's most dynamic creative industries.
- 8.32 The creative industries are one of a few high growth sectors given a sector deal as part of the Industrial Strategy in 2018. This includes a number of key policies under the 'five foundations of productivity': ideas, people, infrastructure, business environment, and places. The aim is to support the growth of the creative industries by increasing exports of this sector, sustaining rapid growth, and boosting jobs.

¹² HM Government, 2017. Industrial Strategy

Buckinghamshire Local Industrial Strategy 2019

- 8.33 The Buckinghamshire Local Industrial Strategy sets out that Buckinghamshire has a highly productive and entrepreneurial economy with a dynamic and resilient employment base underpinned by a strong and high-quality business community. Creative and digital is one of Buckinghamshire’s four internationally significant economic assets in the Buckinghamshire Local Industrial Strategy. Key aims of the strategy include:¹³

“To consolidate a global creative industries capability and further support exporting and inward investment in the film, TV and games sector.”

“Enable communities to flourish, based around a ‘creative and digital’ cluster around High Wycombe, the National Film and Television School, and Pinewood Studios”

Buckinghamshire LEP Strategic Economic Plan (2016-2031)

- 8.34 Buckinghamshire LEP outlined their opportunities for growth in their Strategic Economic Plan (SEP)¹⁴. Amongst various opportunities, film production is noted as a high-value, research-based business activity that can drive growth over the next decade. It is also mentioned as one of their priority sectors for growth, as part of the wider creative industries.

Buckinghamshire – Economic Recovery Plan - 2020

- 8.35 Buckinghamshire LEP are co-ordinating a Local Economic Recovery Plan for Buckinghamshire which forms part of a wider place-based recovery programme. The plan builds on the foundations of the Local Industrial Strategy (‘LIS’) published in 2019 but prioritises those issues which LIS did not address. It has stated an ambition to build on its internationally significant economic assets, of which, the creative and digital sectors are a major part.¹⁵ Reference is made to the existing cluster of film and television businesses in the area, specifically referring to Pinewood Studios and creative businesses. One of the targets of the strategy is to establish a ‘creative and digital cluster’ around High Wycombe, the National Film and Television School, and Pinewood Studios.
- 8.36 An identified specific action in support of recovery includes to back opportunities for new studio development at three locations, with Marlow¹⁶ one such named location.

Buckinghamshire Local Skills Report 2022

- 8.37 Buckinghamshire’s Skills Advisory Panel (SAP) was established in 2019. It brings together local employers, skills providers, and other key stakeholders

¹³ MHCLG, 2019. Buckinghamshire Local Industrial Strategy.

¹⁴ Buckinghamshire LEP, 2020 – Economic Recovery Plan

¹⁵ Buckinghamshire LEP, 2020. Economic Recovery Plan

¹⁶ Buckinghamshire LEP, 2020, Economic Recovery Plan p.14-15

to better understand and resolve skills and recruitment challenges within Buckinghamshire. Film and television is noted as a local priority sector for investment in local jobs and skills, and as such is expected to play a leading role in providing employment and upscaling local residents over the coming decade. The report specifically cites Marlow as an area of interest¹⁷.

Succeeding as a Place: Achieving our Shared Vision for Buckinghamshire to 2050 (Draft Version for Engagement)

- 8.38 The Buckinghamshire Growth Board, working collaboratively with Local Enterprise Partnership, Healthcare NHS Trust, Clinical Commissioning Group, Buckinghamshire Business First and environment and business specialists, have been working collaboratively to develop a Strategic Vision for Buckinghamshire. This document, whilst currently in draft form, explores the current strengths and opportunities present within the Buckinghamshire and sets out clear aims and ambitions of what Buckinghamshire can look like in 2050. In terms of planning for the future the document cites a historic dominance of out commuting due to the imbalance of employment opportunities locally. It recognises the importance of the creative and digital industry which sweeps across the south of the county including Pinewood Studios and the national film and television school at Beaconsfield.
- 8.39 In order to enable the ambition by 2050 the document promotes a road map that encourages, amongst other things:
- a) the nurturing of clusters around our economic assets and the exploration of opportunities for investments and research hubs in the South of the County.
 - b) Ensuring people are supported through training in skills that complement growing sectors and employment in Buckinghamshire.
 - c) Working collaboratively with high quality educational facilities to ensure people are training in the right skills to support growing sectors.
 - d) Increasing the delivery of biodiversity net gain to at least 20%.
 - e) Supporting the development of renewable energy generation and the conversion to energy efficient fuel.

Marlow Film Studios, which sits within the film and television West London cluster in southern Buckinghamshire, supports a new Culture and Skills academy, seeks to achieve 20% biodiversity net gain, and includes significant levels of renewable energy generation, is considered to represent an exemplar of the type of development the Strategic Vision for Buckinghamshire is trying to promote. This represents a material consideration of some weight.

¹⁷ See P.17 of Buckinghamshire Local Skills Report 2022

Supplementary Planning Documents

Marlow Gravel Pits Supplementary Planning Guidance (March 2002)

- 8.40 This document sets out, in very broad terms, the strategy for Marlow Gravel Pits, providing detail to support policy RUR4. It is some 20 years old now and predates the Local Plan by some 17 years. It was also adopted as supplementary planning guidance, rather than the more up-to-date supplementary planning document.

Air Quality SPD (SPD) (March 2020)

- 8.41 The Air Quality Supplementary Planning Document (SPD) sets out Buckinghamshire Council's preferred approach to applying development plan policies in relation to air quality. The guidance seeks to support measures to mitigate against and improve air quality impacts from and on new developments. It seeks to ensure new development within Air Quality Management Areas, are consistent with the local Air Quality Action Plan. The SPD supplements a number of policies set out in the Wycombe District Local Plan (adopted August 2019) and the Delivery and Site Allocations Development Plan Document (adopted July 2013).

Canopy Cover SPD March 2020

- 8.42 The Canopy Cover SPD provides guidance in support of policy DM34 (Delivering Green Infrastructure and Biodiversity in Development). It provides a canopy cover calculator to assist in assessing canopy cover for the purposes of determining planning applications. While the main aim of the canopy cover policy and SPD is to encourage tree canopy cover it also acknowledges that other forms of green infrastructure, such as hedges and green walls/roofs can make a contribution with similar benefits to tree canopy cover (see paras. 2.3.2 and 2.3.3). These other forms of green infrastructure can be included in the calculation where appropriate with the agreement of the Local Planning Authority.

Planning Obligations SPD (March 2020)

- 8.43 This document sets out the Council's approach to securing planning obligations from new development in the former Wycombe District Council area, either to ensure infrastructure is put in place to address the impacts of development or to control and enhance certain aspects of the development. It contains advice on maintenance of open space, biodiversity accounting, canopy cover, air quality, flooding, transport, education, and community facilities.

Non-Statutory Guidance

Landscape Character Assessment (Oct 2011)

- 8.44 The Wycombe Landscape Character Assessment (LCA) was prepared on behalf of the former Buckinghamshire County and Wycombe District Councils and provides a finer grain landscape character assessment of the administrative area of Wycombe, now part of Buckinghamshire Council.

Parking Standards and Guidance (Oct 2015)

- 8.45 This document sets out Buckinghamshire Council’s adopted parking standards (cars, motorbikes, and cycles) for that area. Notably, the parking standards do not relate to film studios. The parking standards are intended to be read flexibly and when dealing with exceptions paragraph 3.2 states that “if a developer believes that the stated standard is not appropriate for the new development, the developer must produce sufficient evidence (e.g. through their transport assessment and/ or travel plan) that a different level of parking would be more appropriate. To this end the proposed parking levels are justified in the Transport Assessment that accompanies this application.

Biodiversity and Planning in Buckinghamshire (March 2014)

- 8.46 The Berks, Bucks & Oxon Wildlife Trust (BBOWT), (former) Buckinghamshire County Council, Milton Keynes Council, Natural England, and the Buckinghamshire & Milton Keynes Environmental Records Centre (BMERC) have worked in partnership to produce this document. The document seeks to guide the approach to addressing biodiversity through the planning process. Notably the document advises that Biological Notification Sites (BNS) are currently under review and are in the process of being assessed against the Local Wildlife Site (LWS) criteria.

Emerging New Buckinghamshire Wide Local Plan (currently scheduled to be adopted April 2025)

- 8.47 Buckinghamshire Council has started work on the preparation of a new Local Plan for the new Buckinghamshire Council unitary authority. This plan is currently due to be adopted in April 2025. At the time of writing there is a brownfield call for sites and a recent report to Committee stated that a Greenfield call for sites will follow in May/June 2022.

9.0 The Four Pillars

9.1 The project has been developed with four guiding pillars at its core. The four underlying pillars of the project are:

- 1) **Economy and Training**
- 2) **Design**
- 3) **Sustainability**
- 4) **Ecology**

These will be addressed in more detail below before turning to the other development management considerations in Section 10 of this report.

Pillar 1 – Economy and Training

Planning Policy

9.2 The Framework sets out at para. 8 that:

“achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued to mutually supportive ways”

9.3 The three objectives are economic, social, and environmental; the social and economic objectives are considered below. The economic objective requires decision makers to value development that will help build a strong responsive and competitive economy. This is done by ensuring that sufficient land of the right type is available in the right places at the right time to support growth and innovation. The Social objective requires decision makers to support strong, vibrant, and healthy communities by fostering well designed, beautiful, and safe places with open spaces that will support the local community’s health, social and cultural well-being.

9.4 For reasons that are set out below, Marlow Film Studios will make a substantial contribution towards building a strong and competitive economy. It will also, through the design approach and the creation of public and private open spaces (most notably within Plot 4), create a beautiful place that will make a significant contribution to supporting the health, social and cultural wellbeing of the local area. Therefore, Marlow Film Studios is considered to perform very strongly against two of the three core priorities in the Framework. For reasons that will be expanded on in other sections of the Development Management Assessment, Marlow Film Studios is also considered to make a significant contribution towards the environmental objective.

9.5 Para. 81 of the Framework states:

*“Planning polices and **decisions** should help create the conditions in which businesses can invest, expand and adapt. **Significant weight should be placed on the need to support economic growth and productivity**, taking into account both local business needs and wider opportunities for development. The approach taken should*

*allow each **area to build on its strengths**, counter any weaknesses and **address the challenges of the future**. This is particularly important where **Britain can be a global leader in driving innovation, and in areas with high levels of productivity**, which should be able to capitalise on their performance and potential.”
(emphasis added)*

- 9.6 Britain, and more specifically the West London Cluster, is a global leader in the production of film and television. This was confirmed in the Officer’s Report to Buckinghamshire Council’s Strategic Sites Committee in respect of the Pinewood application (Ref: PL/20/3280/OA) and thus formed a material consideration in the determination of that application. The report states:

*“Further film production space would respond to the **substantial demand that exists in both the West London cluster and at Pinewood itself**. It is accepted that this is **geographically fixed and not “footloose”**. (Para. 6.29)*

*“It represents economic development, bespoke to the opportunity that exists at Pinewood and **part of a national and regional context**”.*
(Para. 7.10)

*“Pinewood Studios, alongside the national film and television school, **is at the heart of the creative industries sector cluster**” (Para. 7.15)
(Emphasis Added)*

- 9.7 Marlow Film Studios will enable Britain, and the West London Cluster, to further expand economic growth and productivity in this sector thereby building on its existing strengths. In accordance with para. 81 of the Framework the economic strengths of Marlow Film Studios should be afforded significant weight in the decision-making process.

- 9.8 Para. 82 of the Framework requires that planning policies should:

*“set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, **having regard to Local Industrial Strategies** and other local policies for economic development and regeneration”*

And

*“be **flexible enough to accommodate needs not anticipated in the plan**, allow for new and flexible working practices (such as live-work accommodation), and to **enable a rapid response to changes in economic circumstances**.”*

- 9.9 The accompanying Economic Case clearly identifies that the Local (and indeed National) Industrial Strategies set out a clear need for the Film and television industry to be accommodated within the UK, particularly the West London cluster. The Local Recovery and Growth Deal for Buckinghamshire (November 2020), which post-dates the Local Plan and therefore is a more up-to-date consideration, expressly identifies as one of its core asks to

accelerate the UK recovery, increased investment in the screen and film sector¹⁸.

9.10 When the Local Plan was prepared and examined there was no proposal for a Film and television studio on the Site. The identified need for additional space for a film and television studio, which addresses a clear need identified in local and national industrial strategies, is a weighty material consideration, which will accommodate a need not anticipated at the time of preparing the adopted Local Plan. This unanticipated need, along with the need for a rapid response to change in economic circumstances (i.e. recovery following the covid pandemic), is considered to represent a weighty 'other material consideration' which should weigh heavily in the planning balance and contributes to the very special circumstances of this case.

9.11 A report entitled the 'Economic Case' (dated May 2022) Document 5 has been prepared by Volterra, which sets out the:

- a) Global, national, and local importance of the industry, its success and future direction and the local and national policy context that supports its growth.
- b) The value of clusters generally and the West London Cluster in particular, which now rivals major North American locations in importance to the film and television sector.
- c) The strength, economic value and local policy supporting the West London Cluster.
- d) The pressing need for stage space in the UK.
- e) The anticipated social and economic impacts of the proposed development.

9.12 The summary of the Economic Case states:

"The UK is the global filmmaking capital of the world. Film and high-end TV are experiencing substantial growth due to voracious consumer appetite for new quality content.

Capitalising on this growth is a national objective. Current studio space is full and planned developments will not fulfil the need.

Marlow Studios would address the lack of studio space through providing purpose-built space that is of sufficient scale and quality to attract major blockbusters and HETV. It is in a perfect location to maximise potential and grow the overall sector by producing blockbusters that the UK has previously missed out on due to a lack of space.

¹⁸ See P.27 Local Recovery and Growth Deal for Buckinghamshire (November 2020)

If the west London cluster doesn't grow the UK will fail to capitalise on this important growth sector and could lose its world-leading position" (Page 2 of the Economic Case). (Emphasis Added)

National and Local Need

- 9.13 In summary, the Economic Case sets out the value of the film and television sector in UK. It:
- a) **Supports significant employment** - 173,000 jobs in 2019.
 - b) **Employs highly skilled individuals** - 61% of jobs in the sector are held by people with a degree level qualification or higher.
 - c) **Generates significant economic activity** - £19.5bn in gross value added (GVA).
 - d) **Is highly productive** - average output (GVA) per employee (£112,500).
 - e) **Generates an important trade surplus** - £4.3bn in 2019.
 - f) **Increases tourism ('screen tourism')** - £893m spent in the film related tourism segment in 2018.
- 9.14 The Economic Case highlights that because of the growth in demand, film and TV studios in the UK have struggled to meet demand for production space in recent years. There is acknowledged to be a severe shortage of studio space in the industry and only 31% of UK studio stage space is in purpose-built film studios suited to major film and TV drama productions. It is estimated that the UK lost out on almost £1bn in economic activity each year.
- 9.15 The Economic Case sets out how the visible growth in the film and television sector has been recognised by the government. It highlights that the creative industries are one of a few high growth sectors to benefit from a sector deal as part of the Industrial Strategy. The sector deal notes that film inward investment grew by 92% in the five years to 2017, while television grew even faster at 162%. This growth was expected to continue: "with substantial increases in studio capacity and investment in skills, it is feasible that in the period to 2025 our revenues could nearly double to approximately £4bn a year." The deal further notes that the film and television sector specifically has enormous potential due to growing global demand for British creative content. The sector is of national significance and is of particular importance at a time of unprecedented uncertainty in the UK.¹⁹
- 9.16 The Economic Case sets out that in the year 2021, film and television combined attracted £4.8bn worth of inward investment.²⁰ This shows the enormous potential of the sector, and that it has already exceeded the target set in the sector deal. The inward investment contributed to a record overall production spend of £5.6bn.
- 9.17 The Economic Case highlights that local policy also emphasises the importance of strengthening the film and television offer in

¹⁹ BEIS & DCMS, 2018. Creative industries: Sectoral Deal

²⁰ BFI, 2022. Official 2021 BFI statistics reveal a record £5.64bn film and high-end TV production spend in the UK.

Buckinghamshire. Employment in production industries in Buckinghamshire grew by 76% in the decade pre-Covid, compared to 15% for overall employment growth.²¹ The sector is identified as a growth sector by the Buckinghamshire Local Enterprise Partnership (LEP) and their recovery plan notes the importance of building on the existing assets so that it can be at the forefront of future growth. The LEP wishes to work to consolidate a global creative industries capability and further support exporting and inward investment in the film and television sector. Buckinghamshire Skills Hub believe that film and television can play a leading role in providing employment and upskilling local residents over the coming decade.²²

*“There are **twice as many creative industry jobs within the Buckinghamshire economy than the national average**, many of which are in the film and TV sector”*

*“**Thousands of jobs are expected to be created in the film and TV industry in and around Buckinghamshire over the next few years as the UK production boom continues**”*

- 9.18 By meeting these local aims, Marlow Film Studios can have a significant effect on the UK’s national offer in the film and television sector.

The Importance of the West London Cluster (WLC)

- 9.19 The Economic Case sets out that clusters are widely acknowledged and accepted. Supporting and building on existing clusters forms a key government objective in order to deliver future economic growth²³. It identifies clusters as ecosystems of interconnected firms, individuals, and institutions within a particular field. They drive economic growth in the modern economy. Supporting clusters and their associated benefits of productivity, innovation and new business growth has become an important policy objective in the UK and further afield. There is a consensus that governments should “reinforce and build on existing and emerging clusters rather than attempt to create entirely new ones.”²⁴. New business growth within a cluster results in a positive feedback loop, benefitting all the members of the cluster. As global competition heightens, and with the uncertainty caused by Brexit and COVID-19, it is even more important that we nurture and invest in our strengths.

- 9.20 The global major film and television sector is a good example of a field that is dominated by international clusters and hubs, with several well-known examples such as Hollywood, Vancouver, and Budapest. It is unanimously accepted by respected industry bodies that the West London Cluster is the only place in the UK that competes on this global scale and can attract the highest budget productions. The rest of the UK does not provide the ecosystem of skills, infrastructure, capabilities, reputation, and facilities for major films. West London is the dominant location for high-end producers

21 ONS, 2020. Business Register and Employment Survey 2019.

22 Buckinghamshire Skills Hub, 2022. Buckinghamshire Local Skills Report.

23 See para. 83 of the Framework.

24 Porter, M., 1998. Systems of innovation: growth, competitiveness, and employment.

and the growing market for television. Between 2015 and 2020, London produced over double the amount of blockbusters compared to the second largest film cluster, Atlanta²⁵. Nearly four fifths (79%) of the country's turnover in film and television and 70% of companies are concentrated in London and the South East²⁶.

- 9.21 The Buckinghamshire Local Skills Report notes that Marlow can play a part in the West London Cluster's offer with regards to film and television production space:

"Buckinghamshire's screen sector sits within a wider West of London Screen Cluster, which includes studios at Leavesden, Elstree, Shepperton, Long Cross, Bovingdon, Didcot and, within the next few years, Reading and potentially Marlow"²⁷

- 9.22 But existing studios in the cluster are full. Pinewood, Shepperton and WB Leavesden – the Cluster's world class studios that can accommodate major productions – are at capacity. These three biggest studios – the only ones capable of hosting major blockbusters and television in the UK – are all tied up on long leases to single users for the medium term, reducing space available to other production companies²⁸.

- 9.23 PwC estimated in 2018 that 940,000 sqft of additional studio space was needed to accommodate footloose blockbusters alone²⁹. As the opportunities in the sector grow across the globe, this need is likely to increase in the coming years. Various studies have estimated how much stage space could be required over the coming years. Lambert Smith Hampton estimated 2.3m sqft of stage space could be required by 2033, whilst Saffrey Champness suggested that more could be required (2.6m sqft) over an even shorter period of time (by 2025).^{30,31} Knight Frank estimate that the UK has approximately 6m sq ft worth of stage space³². Lambert Smith Hampton estimate this to be at a similar level, stating that the UK currently supports around 4.2m sq ft of dedicated film and TV, as well as at least an additional 1.2m sq ft in a variety of alternate spaces for studio use.

- 9.24 Expansions of Pinewood and Shepperton and several other new studios in and around London will make a significant contribution to the need for new space. However, due to the steep trajectory of growth, there is demand for more studios beyond what is currently in the pipeline, particularly for purpose-built space.

²⁵ The-Numbers.com – movie budgets; IMDB

²⁶ BFI, 2019. The UK Film Economy

²⁷ Buckinghamshire Skills Hub, 2022. Buckinghamshire Local Skills Report.

²⁸ Pinewood and Shepperton were both tied down to long leasing deals in 2019. Disney entered into an agreement with Pinewood to take most of their stages for at least a decade. Netflix entered into a similar length deal at Shepperton. Leavesden has been owned by Warner Bros since 2010.

²⁹ PwC, 2018. Review of UK Film and High-End TV production facility market

³⁰ Lambert Smith Hampton (2021): The UK & Ireland Film & TV Studio Property Market

³¹ Saffrey Champness (2021): Bray Film Studios Economic Impact Analysis

³² Knight Frank, 2022. UK Film and Television Studios Market.

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- 9.25 The Economic Case presents several forecasts for the requirement for new stage space in the West London Cluster to 2033, reflecting the uncertainty about changes in how we consume media, how we exit from the pandemic and growth in the economy. Even under the lowest forecast, taking into account the pipeline and Marlow Film Studios, over 175,000 sqft of extra stage space would still be required to meet demand by 2033 (see Fig 3, p.9 of the Economic Case). Based on the core forecast in this report, there would be need for an additional 2.6m sqft of stage space by 2033 including what is already expected to be provided in the pipeline.
- 9.26 On the basis of the above, and the full case set out in the Economic Case, the importance of the West London Cluster is clear. Similarly, the necessity of locating the Marlow Film Studios within the cluster and the mutually beneficial nature of doing so, is also clear. Marlow Film Studios benefits from the Cluster and the Cluster benefits having Marlow Film Studios within it.

Why Marlow – Economic and Social Drivers

- 9.27 The Economic Case sets out the following social and economic factors that drives the attractiveness of Marlow for the location of the new film studio:
- 9.28 **Growing sector:** the global film and television sector is one of the fastest growing sectors and is projected to grow significantly, driven by increased demand for streaming due to the recent rapid rise across the world of households being connected to broadband internet.
- 9.29 **National significance:** there is a clear need for more studio space in the West London Cluster if the UK is going to maximise the potential of the growing film and television sector and achieve local and national policy to grow film inward investment and drive the economic recovery from COVID-19. The UK is already missing out on 5 – 10 blockbusters per year according to PwC research³³. Expansions of Pinewood and Shepperton and several other planned new studios will make an important contribution to the need.
- 9.30 However, there is still demand for additional stage space. Marlow Film Studios can provide the space and facilities to help meet this demand. The UK competes on a global stage for this activity. If the right space is not provided in the right location, then the UK will continue to lose out to other countries and risk losing its world leading position. This increases the additionality of the benefits we have estimated. The need to provide studio space and enable growth in the sector is therefore of national importance.
- 9.31 **Location:** the WLC is the only part of the UK that has the critical mass of sufficient resources and competencies, including a vast pool of skills and talent, to accommodate major blockbusters and television. Following the expansions of Pinewood, Shepperton and other studios, the Marlow Film Studios is the only Site in the cluster capable of delivering this scale and quality of space.

³³ PwC, 2018. Review of UK Film and High-End TV production facility market

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- 9.32 **Positive feedback loop:** research and government policy supports cluster development. Investment in the Cluster would increase the attractiveness, efficiency, and brand of the whole Cluster, resulting in a positive feedback loop which amplifies the benefits of the Cluster for all members, supporting significant economic benefits to the UK economy.
- 9.33 **Purpose built:** only 31% of studios in the UK are purpose built, with much of the supply made up of temporary studios or repurposed buildings / conversions³⁴. Marlow Film Studios have been designed to optimise the space for productions by creating clusters of different spaces within the development to respond to the bespoke needs of different productions. There is a shortage of space in general but in particular premium, purpose built studios are the optimal solution to meet identified demand.
- 9.34 **Accessible location:** Marlow is a very accessible location in transport terms, particularly to the US via London Heathrow, which is important. The Site is a five minute drive from Marlow Station, and around an hour from the monument near Charing Cross Station and the centre of London. There are two existing bus services that operate between Marlow and Little Marlow that can provide access to the Site and scope to expand and deliver new services. The Public Right of Way through the Site and Marlow Road to the north provide additional access to the Site.
- 9.35 **Considerable economic benefits:** Marlow Film Studios would support significant socio-economic impacts locally. The studio would create an average of 2,550 construction jobs on-site throughout the construction period, up to an estimated 4,185 permanent direct and indirect new jobs and generate approximately £338m in GVA each year. The studio would support annual tax revenues of up to £105m, whilst increasing exports by up to a projected £102m annually and attract tourists. Marlow Film Studios could directly deliver up to 17% of Buckinghamshire's planned future jobs growth to 2030, helping to counter the net loss of 138,000sqm in B class employment floorspace in Wycombe between 2005 and 2017. Marlow Film Studios would also lead to economic stimulus for wider and supporting industries through production expenditure, which is estimated at between £130m and £155m for businesses in the WLC per year.
- 9.36 **Social value:** Marlow Film Studios would positively impact skill levels in the area by providing educational-based services and programmes. The studio is also committed to improving the overall amenity of the local area. For instance, bus transport and cycle access are set to be improved nearby, and pedestrian access will also be provided through the provision of walking routes on-site.

Critical Mass

- 9.37 The case for the critical mass of development is set out in full in Appendix 5. In summary, the production landscape has changed, productions in the UK have become larger and more space is needed to service global demand. There needs to be a step-up in the quality and quantity of facilities. In order for studios to function effectively and service larger

³⁴ Lambert Smith Hampton, 2021. The UK & Ireland Film & TV Studio Property Market 2021.

customers they need to be of a certain size. Smaller studios are likely to struggle as supply (choice) increases. Repurposed buildings are rarely of the quality of purpose-built facilities. Studios need to be of a certain size to create a halo effect and avoid dark periods, which affects the creation of sustainable supply chains. Film Studios need the ability to house two feature productions simultaneously with others in pre-production and prep, especially when productions are at different stages of development. This is the key to ensuring optimum critical mass as it creates a constantly active studio. Studios also need to be of a certain scale to support education and training facilities.

- 9.38 Marlow Film Studio has been designed to accommodate the production of two simultaneous films or four simultaneous television programmes, or a mix of the two. It provides all the spaces required to achieve this (workspaces, offices, sound stages, flexible space etc) in one location. Marlow Film Studios has therefore been designed to achieve optimum critical mass. The critical mass serves to maximise its economic, social, and environmental benefits and ensures it remains a viable ongoing success into the future.

Economic and Social Impacts

- 9.39 The Economic Case sets out the predicted Economic and Social impacts of Marlow Film Studios. The Economic Impacts relate to the: Construction Phase, Operational Phase, Economic Output, Tax Revenue, Exports and Production Spend. The social impacts relate to: Social Tourism, Creative Industries, Employment and Skills, National and Local Policy and Health.

- 9.40 These benefits are summarised under their respective headings below:

Economic Impacts

Construction Phase

- a) 9,130 implied job years over a construction period of around 43 months from Q3 of 2023 to Q1 of 2027. An average of 2,490 construction jobs on-site throughout the construction period.
- b) Construction workers are expected to spend approximately £7 million in the local area over the duration of the construction period.
- c) Employment and Skills Strategy - Outlines commitments to maximise opportunities to upskill local people during the construction phase.

Operational Phase

- d) Marlow Film Studios would lead to the creation of 1,780-2,415 direct full time equivalent (FTE) jobs.

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- e) Marlow Film Studios would support a net additional total of up to 3,685 FTEs. This is equivalent to up to 4,180 jobs when accounting for part-time working patterns³⁵.
 - f) Marlow Film Studios could deliver up to 17% of the county's planned future economic growth.

Economic Output

- g) Direct and indirect employment supported at Marlow Film Studios would lead to an increase in direct and indirect GVA of up to £338m per annum.

Tax Revenue

- h) Marlow Film Studios would lead to additional annual Exchequer contributions of between £78m and £105 per year.

Exports

- i) Marlow Film Studios would lead to up to a £102m increase in the value of the UK's exports on an annual basis.

Production Spend In the movies

- j) Assuming that 67% of production expenditure is spent in the wider economy, Marlow Film Studios is likely to support between £130m - £155m of production expenditure for businesses in the WLC each year.

Social and Wider Impacts

Tourism

- a) Major productions have significant spill over effects to the local and national economies as they attract tourists stimulated by the desire to visit locations that have hosted major films³⁶. Research in 2018 found that 7% of all tourists to the UK cited visiting a film or TV set location as their primary reason to visit the UK³⁷. This demonstrates the draw of the sector in creating tourism and its associated economic benefits. Marlow Film Studios would build on this, helping to increase positive perceptions of 'brand UK'. An increase in tourism would provide economic stimulus to the Wycombe and wider Buckinghamshire economies. This stimulus would help support Buckinghamshire's economic recovery, in line with the Economic Recovery Plan.

³⁵ See Table 6 in the Economic Case

³⁶ Olsberg and Nordicity, 2015. Economic Contribution of the UK's Film, High-End TV, Video Game, and Animation Programming Sectors

³⁷ VisitBritain, 2018. Film and TV locations as a driver of tourism

Culture and Community Assets

- b) Marlow Film Studios will provide two new buildings for the community:
- A 147 sqm (GEA) (10,193 sqft) new community building in Plot 2a for use by local residents.
 - A 979 sqm (GEA) (1,582 sqft) Culture and Skills Academy for cultural, educational, and recreational uses on Plot 4. This building is proposed to be a multi-purpose building, which will be utilised for educational purposes and community, environmental and recreational uses at other times. It will also provide a hub for occasional community cultural events in connection with the recreational use of Plot 4.

These buildings will provide important new community assets in an area of identified need.

- c) The Studio Hub will host occasional community screenings of new releases and other publicly attended film/TV related events.

Creative Industries

- d) The Creative Industries Sector Deal was launched in 2018 with the aim of doubling Britain's share of the global creative immersive content market by 2025. Creative clusters are at the heart of the Sector Deal, with policies designed to encourage the development of such clusters.

Employment and Skills

- e) The applicant is committed to producing a best-in-class employment and skills programme. Central to this is the establishment of the proposed Culture and Skills Academy on the Site (Plot 4). This facility would be approximately 1,086 sqm (11,700 sqft), and will provide a platform to deliver educational, skills, recreation, and cultural resources. The skills programme, which is set out in detail in the Skills and Workforce Development Plan (Document 6), will include:
- i. Engagement with local schools (primary and secondary) – Highcrest Academy, Sir William Borlase's Grammar, and Great Marlow School.
 - ii. Further and higher education programmes (inc. Bucks New University, Bucks College Group, Amersham and Wycombe College, National Film and Television School and Bucks Skill Show).
 - iii. Pathways for re-skilling and life-long learning (inc. a local screen supplier directory, training and jobs fairs, promotion of local jobs, links with Buckinghamshire Council, Buckinghamshire Skills Hub and Job Centre Plus).

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- iv. Studio camps (inc. 30 free places per annum of pupils in the local school catchment area).
 - v. Employment and Skills Support (inc. at least 30 new trainee positions at a cost of £104,000 pa for 5 years with 66% from the local area, 7 bursaries at a cost of £105,000pa, employment of a part-time skills coordinator).
 - vi. Skills and Training Events (inc. CPD events, construction job apprenticeships,
 - vii. Community engagement programmes (e.g. working with organisations such as Jam Theatre in Marlow)
 - viii. Themed cultural events in the Skills and Culture Academy (inc. access to the cinema and screening room, BAFTA events etc.).
 - ix. Environmental, social and governance (i.e. an independent ESG audit).
- f) The social value of full-time employment for a single individual is £14,430 per person. Assuming that five percent of the individuals gaining direct employment on-site came from out of work, this would result in approximately £1.1m in direct social value³⁸.
- g) The social value of vocational training is £1,120 per person. The Employment and Skills Strategy targets to provide thirty trainees at the studio each year. If they receive vocational training specific to the industry, this would generate approximately £45,900 in social value³⁹.

National and Local Policy

- h) Marlow Film Studios can help contribute to UK policy goals – by providing a purpose-built studio with world class facilities in an ideal location that major film production companies want to work at. One of the targets of UK policy is to double film and television revenue by 2025⁴⁰. Purpose built facilities such as Marlow Film Studios will be key in providing the necessary space to achieve this goal.
- i) Marlow Film Studios can help contribute to the aims set out in various local policies. Creative and digital is one of Buckinghamshire’s four internationally significant economic assets in the Buckinghamshire Local Industrial Strategy⁴¹.

³⁸ Para. 7.26 Economic Case

³⁹ Para. 7.26 Economic Case

⁴⁰ BEIS & DCMS, 2018. Creative Industries: Sectoral Deal

⁴¹ MHCLG, 2019. Buckinghamshire Local Industrial Strategy.

“To consolidate a global creative industries capability and further support exporting and inward investment in the film, TV and games sector.”

“Enable communities to flourish, based around a ‘creative and digital’ cluster around High Wycombe, the National Film and Television School, and Pinewood Studios”

- j) Marlow Film Studios will have the facilities capable of playing a major role in supporting Buckinghamshire’s aims to be globally competitive in this sector, attracting inward investment and strengthening the existing cluster.

Health

- k) Marlow Film Studios will provide several private and public open amenity spaces for workers on-site and members of the public. The open spaces include the: Arrival Plaza; Studio Hub Plaza; spaces adjacent to the central access road; and Plot 4.
- l) Walking and cycling routes to and within the Site are set to be improved. The walking and cycling interventions on the Site are estimated to generate approximately £3.9m in social value each year.⁴²
- m) Marlow Film Studios would lead to the creation/retention of 4.9ha of open space with varying levels of permissive access by the public. Given the scale of Marlow Film Studios and the number of employees that it will attract, open space within private areas is also considered to be of social value.
- i. A publicly accessible cycling connection alongside Plot 3 – 0.2ha;
 - ii. Studio Hub open space. This will be open to the public for certain events – 0.2ha;
 - iii. Enhanced Public Right of Way alongside Plots 1 and 3 – 0.6ha;
 - iv. Public amenity area adjacent to community building for close neighbours on Plot 2a – 0.1ha;
 - v. Permissive path on edge of Plot 4 – 1.0ha; and
 - vi. Permissive accessible area on Plot 4 – 2.8ha.

Conclusion of Socio-Economic Case

- 9.41 Planning policy is supportive of the social and economic benefits of development and, in particular, those areas (‘Clusters’) that expand on economic growth and productivity. The promotion of Film and television is a

⁴² Para.7.32 of Economic Case

key part of National Industrial Strategy, Creative Industries Sector Deal, Buckinghamshire LEP Industrial Strategy (2019), Buckinghamshire LEP Strategic Economic Plan (2016-2031) and Recovery and Growth Deal for Buckinghamshire (Nov 2020) and therefore of crucial importance to the national and local economy. The Framework is clear that it requires decisions to have regard to the Industrial Strategy and to be flexible and respond rapidly to changes in economic circumstances.

- 9.42 The National and Local strategies set out a clear and compelling need for the film and television industry to be accommodated within the UK, particularly the West London Cluster. The Economic Case sets out clearly the need for significant quantities of additional production space in the right places. It sets out the contribution that the West London Cluster can, and should, make (as implored by Local and National Industrial strategies) to meeting that need. The Economic Case clearly sets out the significance of Marlow within the cluster, the contribution that the unique offer can make and the clear benefits that will flow from the development.
- 9.43 The Economic Case concludes by setting out significant predicted Economic and Social impacts of Marlow Film Studios. The Economic Impacts relate to the: Construction Phase, Operational Phase, Economic Output, Tax Revenue, Exports and Production Spend. The social impacts relate to: Social Tourism, Creative Industries, Employment and Skills, National and Local Policy and Health.
- 9.44 The Framework (Para. 81) makes clear that ‘Significant weight should be placed on the need to support economic growth and *productivity*’. In this instance, given the acute need, value of the project and quality of the offer, the Economic Case represents very special circumstances of significant magnitude.

Pillar 2 - Design

Place Making and Design Quality

The relevant Development Plan policies are:

- CP9 (Sense of Place), and
- DM35 (Placemaking and Design Quality)
- Framework (CH12 – Achieving Well-Designed Places)

Planning Policy

- 9.45 Policy CP9 of the Local Plan sets out the high-level policy position for the design approach contained in the Development Plan. Policy DM35, meanwhile, addresses more detailed design considerations. Between these two policies and the guidance contained in para. 130 of the Framework they emphasise the importance of: high quality design; optimising the use of previously developed land; optimising the density of development⁴³; taking a comprehensive approach to development; and providing a robust and legible structure of public and private spaces. In line with the Framework the Development Plan policy requires developments to take the opportunities

⁴³ Criteria 5 of policy CP9 and criteria 3i) of policy DM35 and para. 130c of the Framework

available for improving the character and quality of the area. For reasons that will be expanded upon below Marlow Film Studios complies with these policy requirements.

- 9.46 Chapter 12 of the Framework sets out central government’s vision for design in the planning process. Para. 126 states:

“The creation of **high quality, beautiful** and sustainable buildings and places is **fundamental to what the planning and development process should achieve**. Good design is a **key aspect of sustainable development**, creates better places in which to live and work and helps make development acceptable to communities.”

For reasons that will be expanded upon below, Marlow Film Studios demonstrates high quality and beautiful design. High quality design is one of the central pillars of the development strategy for Marlow Film Studios.

- 9.47 Para. 134 of the Framework states:

“...**significant weight** should be given to:
a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or
b) **outstanding or innovative designs which promote high levels of sustainability**, or **help raise the standard of design more generally in an area**, so long as they fit in with the overall form and layout of their surroundings.

Marlow Film Studios has delivered outstanding commercial design which will help raise the standard of design more generally and promote high levels of sustainability (both on-site and at a wider spatial level because of the rebalancing of jobs and homes in the area). Notwithstanding the wider landscape impact, which is addressed below (page 84) Marlow Film Studios has also taken the opportunities available (i.e. retention of existing vegetation where practicable, planting of new vegetation, inspiring design, green walls/roofs, and a muted materials pallet) to fit within the overall form and layout of the wider area. As such, Marlow Film Studios has delivered against local Development Plan policy and the design criteria set out in para. 130 of the Framework. Therefore, in line with para. 134 of the Framework, the overall high-quality design should be afforded significant weight in the decision-making process.

Design and Landscape Appraisal

- 9.48 Marlow Film Studios has been developed following a comprehensive process of Site survey, Landscape and Visual Impact Assessment, landscape led design development and consultation. The application is accompanied by a Design and Access Statement (Document 2) prepared by Prior + Partners and Wilkinson Eyre Architects (Ref: May 2022). This document sets out the design rational for the Site and should be read alongside the Planning Statement. It explains the:

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- a) Site context and constraints;
 - b) The masterplan approach - layout, character areas, scale and massing, Site arrival areas, access, and movement etc.;
 - c) Architectural approach – Building typologies, workshops/offices, Mobility Hub, studio hub, cultural/education centre, and car parking;
 - d) Landscape approach; and,
 - e) The sustainability and environmental strategies.

9.49 The design evolution has been the subject of a three-part Design Review Panel process with Design South East (DSE), which took place from November 2021 through to April 2022 (outlined in Section 7 of this Statement).

9.50 The first stage addressed the location and masterplan approach, the second stage addressed the architectural approach and the third stage a round-up of outstanding issues. A report was produced by DSE at each stage of the process, and copies of the three reports are attached at Appendix 4 of this Planning Statement. The reports provided a series of comments in respect of the proposed development, as one would expect from an iterative process of this nature, but the overall feedback was one of constructive criticism, understanding of the development and support for the principle and approach. The key feedback is set out below.

9.51 In respect of Design Review Panel 1, the Review Panel stated:

“We understand the logic of a film studio in this location as part of a film studio cluster out of West London”. (Para. 1.2 - DSE Report Dated 25 November 2021)

*“We appreciate the aspirations behind this ambitious project and the team’s **thorough design approach**. We particularly welcome the wider beneficial impact this scheme could have on Marlow's public transport provision” (Summary – DSE Report Dated 25 November 2021)*

The Design Review Panel acknowledged the general approach to Site selection and design approach. It is acknowledged that a number of design issues were also raised (See Section 7 of the Planning Statement). These quotes clearly demonstrate that DSE had an appreciation of the broad concept and design approach at that stage.

9.52 In respect of Design Review Panel 2, the review panel stated:

“we are sympathetic to the idea of this simultaneously being a Country Park and a place for making film and television. However, these two concepts must be carefully balanced and explored to deliver a public experience where a visitor can appreciate the ecology, and the country parks rich and biodiverse landscape, lots

*catching glimpses of another world of film making sets and **intriguing buildings***” (Para. 1.1 – DSE Report Dated 17 December 2021)

*“the **architectural approach is promising**; there is a balanced relationship between simple, industrial buildings and a more complex, richer architecture we understand the team has worked hard to ensure that the buildings are as muted and unobtrusive as possible to minimise the scheme's visual impact. However, we also recognise the merits of including more celebratory pieces of architecture that expressed the scheme's uniqueness. The hub building could adopt such an architectural approach”.* (Para. 5.1 – DSE Report Dated 17 December 2021). (Emphasis Added)

The Design Review Panel acknowledge the intriguing nature of the buildings and that the architectural approach was promising. Once again, it is acknowledged that in their role as critical friend, they also raised several areas that needed further work, but there was a broad appreciation of the design approach on the Site.

- 9.53 In respect of Design Review Panel (DRP) 3, the review panel acknowledged that the redesign of the Studio Hub was remarkably improved and now has a more logical relationship with the studios and Public Right of Way. They advised that some changes were made to the scheme and the Design (inc. treatment of staircases and the approach to public art on the Site) and that the Design and Access Statement explained the proposals: relationship with the wider landscape; the contribution that Marlow Film Studios would make to the recreational use of the land; how the land would be maintained; and the rationale for the location of the café on Plot 2a. The Design Review Panel was clear that the ultimate planning balance and assessment of very special circumstances would be a matter for the Council.
- 9.54 Having regard to the full assessment of the design set out in the Design and Access Statement, Marlow Film Studios has taken a comprehensive design approach, which optimises the development potential of the Site, thereby making the most of a Site in an accessible and sustainable location. Marlow Film Studios demonstrates attractive and high-quality design, which is appropriate in terms of its character, scale, form, layout and the detailed design of buildings, structures, and spaces around them. The design of the Site has been informed by public engagement and the design review panel process. The design quality when taken within the context of the Site and benchmarked against the quality of commercial developments generally (inc. film studios) and existing commercial developments in the local area specifically, the design is outstanding. The delivery of this Site will serve to help raise the standard of design more generally in the area. Therefore, in line with paragraph 134 of the Framework the design quality of the scheme should be afforded significant weight in the decision-making process. The issue of sustainability which feeds into the design will be assessed in more detail below (See Third Pillar).

Arboriculture

The relevant Development Plan policies are:

- DM34 (Delivering Green Infrastructure and Biodiversity in Developments)
- 9.55 Policy DM34 requires developments to protect trees to be retained through Site layout and during construction. The application is accompanied by an Arboricultural Survey (July 2021) and an Arboricultural Impact Assessment (Document 13) prepared by Waterman.
- 9.56 The Arboricultural Survey advises that there is a wide range of mainly broad-leaved species on the Site of varying ages and sizes. A total of 167 individual trees, 59 groups of trees, 3 Woodlands and 5 hedgerows (234 arboricultural features in total) were surveyed, all of which are located on or adjacent to the development Site. Some of the trees present on the Site were afforded protection through the provision of 2 area TPO. The majority of the vegetation on the Site is located on the Site perimeters and around the edge of Plot 4. The survey identified 8 category 'A' trees, 73 category 'B' trees, 14 category 'C' trees; and 12 category 'U' trees.
- 9.57 The Arboricultural Impact Assessment advises that 40 trees (and/or other arboricultural features) will be removed to facilitate the development. Of these 8 were awarded a moderate B grade and 42 were awarded a low 'C' grade. A further 3 'U' grade trees are to be removed for reasons of sound arboricultural management.
- 9.58 The key arboricultural features on the Site were identified as:
- a) G14 - the belt of Lombardy Poplar trees growing along the north boundary of the Site to the south of the A4155, which is readily visible in views from this road as well as the surrounding area;
 - b) T157 - the Poplar growing to the south of the southern lake. This is a large tree at 33m tall and is readily visible in surrounding views; and,
 - c) T19 - large English Oak tree which is a significant feature of the surrounding residential area.

Of the key arboricultural features, only a small number of Poplar trees (G14) would be lost; the minimum necessary to facilitate access to the Site. Tree T157 is located off Site and will be unaffected by the proposal. Tree T19 is also located off Site such that its canopy and root protection area will not be materially affected by the proposal.

- 9.59 Those trees to be removed are mostly located centrally within the Site, along the boundary with the A404, in the location of the Studio Hub and at key access points into the Site and between Plots (namely Plots 3 & 4 and 4 & 5). The losses would be more than compensated for by the proposed landscaping scheme, which proposes the planting of 348 new individual trees. The retained and proposed trees on the Site provide a total canopy cover of 32%.
- 9.60 The Arboricultural Implications Assessment sets out how those trees proposed to be retained will be protected during construction.

Landscape

The relevant Development Plan policies are:

- CP9 (Sense of Place),
- DM34 (Delivering Green Infrastructure and Biodiversity in Developments)
- DM35 (Placemaking and Design Quality)
- Framework (CH12 - Achieving Well-Designed Places)
- Canopy Cover SPD March 2020

- 9.61 In support of the application a Landscape Strategy is set out in the Design and Access Statement (Document 2) (May 2022), which has been prepared by Gillespies in partnership with Prior + Partners. A Landscape Masterplan is also included with the submission (ref: P20514-00-003-GI|L-0100).
- 9.62 The Landscape Strategy in the Design and Access Statement sets out the rationale behind the hard/soft landscape masterplan, boundary treatments, film studio landscaping and bespoke approach to Plots 4 & 5. The strategy sets out an anticipated planting palette, details of hard landscaping and incidental hard landscape features (such as benches etc.) and technical information in respect of maintenance and management. The landscape strategy has been prepared alongside the ecological and sustainable urban drainage strategy to ensure synergy of approach. Care has been taken to ensure that important green corridors and structural buffers are preserved and integrated into the scheme.
- 9.63 A bespoke approach has been adopted in respect of the landscape setting of the public right of way, Westhorpe House, the main approach to Westhorpe House and Plots 4 and 5 to ensure their setting and the aesthetic/feel of these spaces respects their unique characters. The main focal spaces, such as the Arrival Plaza and Studio Hub, adopt a more bespoke approach to soft and hard landscaping to reflect the different functional requirements of these spaces and the anticipated intensity of use. Streetscapes have been designed to accommodate the studios operational needs whilst providing attractive spaces for staff/visitors and maximising the contribution to biodiversity, tree canopy cover, and sustainable urban drainage.
- 9.64 The proposed planting regime employs a broad-brush approach with an emphasis on native meadow and hedgerows to provide a low maintenance and attractive solution, which helps to reinforce the more rural character of the development and maximises the contribution to biodiversity.
- 9.65 Streetscapes are designed to provide space for trees. Generally, these are consolidated at the corners of buildings where there is more access to light and less conflict with vehicular access and the servicing of buildings. The roofs of all sound stages incorporate green roofs and some incorporate green walls. These serve to soften the hard form of development when viewed from surrounding land and offer a valuable habitat, thereby enhancing the biodiversity value of the Site as a whole.
- 9.66 In summary, the landscape approach has taken the opportunities available to mitigate Marlow Film Studios impact on the landscape. It incorporates existing vegetation of value and proposes a robust landscape strategy to

break up the hard form of the development, including green roofs on all soundstages.

- 9.67 The landscape strategy operates at a wider landscape level by screening and softening the hard form of the development when viewed from surrounding land and at a more intimate level by creating unique spaces and landscape led experiences on the Site. It also fully integrates with the ecology and sustainable urban drainage strategies for the Site. Therefore, it is considered to comply with Development Plan policy and the Framework.

Tree Canopy Cover

- 9.68 Para. 131 of the Framework recognises the important contribution that trees make to the character and quality of the built environment and assistance they offer to help combat climate change. Policy DM34 of the Local Plan introduces a requirement to:

*“Achieve a **future canopy cover of 25%** of the site area on sites outside of the town centres and 0.5 ha or more. This will principally be achieved through **retention and planting of trees**, but **where it can be demonstrated that this is impractical the use of other green infrastructure (e.g. green roofs and walls) can be used to deliver equivalent benefit;**” (section 3b. of policy DM34)” (emphasis added)*

- 9.69 Gillespies have prepared a Tree Canopy Cover Assessment (Document 7) (Ref: P20514-00-001-0731) which accompanies the application submission. A canopy cover calculation has been undertaken in accordance with the SPG. The calculation includes the:
- Retention of existing trees and groups
 - Creation of new areas of woodland
 - New tree planting within streets and buffer zones
 - New green infrastructure elements including biodiverse roofs to soundstages and green walls.
- 9.70 Notably hedgerows (other than where they incorporate tree planting) and grasslands are not included in the calculation. Green walls and roofs have been included in the calculation because, as acknowledged in policy DM34 and the Canopy Cover SPD (para. 2.3.3), they make a similar contribution to overall canopy cover; they also dovetail with the masterplan vision and functional requirements of the Site.
- 9.71 The canopy cover area for the Site has been calculated as 100,553m², which equates to 32% coverage. This is made up of 15% retained trees, 12% new tree planting and 4% new green infrastructure elements. The 32% canopy cover achieved on Site exceeds the 25% policy requirement.
- 9.72 It should be acknowledged that the canopy cover calculation does not include the significant areas of mosaic habitat on the Site, which would be delivered as part of the biodiversity net gain on Plots 4 and 5. Mosaic

habitat, which would have a similar value as green roofs, would have the practical effect of further increasing the canopy cover calculation still further.

Pillar 3 - Sustainability

The relevant Development Plan policies are:

- CP12 (Climate Change), and
- DM33 (Managing Carbon Emissions: Transport and Energy Generation)
- Framework CH12 and CH14

Planning Policy

- 9.73 The key policies in the Local Plan in respect of sustainability are CP12 (Climate Change) and DM33 (Managing Carbon Emissions: Transport and Energy Generation). Policy CP12 is a high-level strategic policy and DM33 is a development management policy with more site-specific requirements.
- 9.74 Policy CP12 sees the spatial strategy as the primary tool for tackling climate change i.e. minimising the need to travel by directing development to those locations that are best placed to meet day-to-day needs. For reasons that will be expanded upon in full in the Transport section of this report, Marlow Film Studios integrates well with Marlow (with good walk/cycle connections) and will provide good public and sustainable travel connections with High Wycombe, Marlow, Maidenhead and Bourne End, and therefore addresses the spatial aspect of minimising Marlow Film Studios impact on climate change.
- 9.75 In terms of sustainability, Policy CP12 refers to higher water efficiency standards, the integration of blue and green infrastructure into the design of new development, reducing the heat island effect, reducing air pollution, and supporting the integration of renewable technologies into commercial developments. There are no site-specific requirements within the policy or reference to any industry standards such as BREEAM. The supporting text to the policy notes that energy efficiency standards are primarily addressed through building regulations and expressly identifies the value of trees in reducing the heat island effect. Marlow Film Studios is considered to exceed the requirements and aspirations of this policy. This weighs in favour of the grant of planning permission.
- 9.76 Policy DM33 is a development management policy in the Local Plan. The policy has requirements for development to:
1. be well served by all modes of transport (i.e. car, bus, walk and cycle);
 2. make provision for alternative vehicle types and fuel;
 3. include measures to reduce reliance on single occupancy car trips and to increase the use of sustainable transport modes;
 4. integrate renewable technologies into development;
 5. investigate, and where feasible implement, district wide energy or heating systems, for larger scale developments.
- 9.77 Marlow Film Studio will:
- a) be well served by all modes of transport;

-
- b) make provision for a range of vehicle types including 20% of parking spaces having EV charging points and the remainder having passive provision;
 - c) deliver a strategy to promote sustainable travel choices with an emphasis on bus, walk and cycle; and,
 - d) integrate renewable technology into the development with photovoltaic panels on all soundstages and car parks,

The potential for a district wide energy or heating system was investigated but was not found to be desirable in sustainability terms. A more sustainable outcome could be achieved with micro renewables.

- 9.78 Taken in the round the Local Plan is absent specific requirements for on-site renewables and/or improved thermal efficiency. The Local Plan focuses primarily on delivering CO₂ reductions through transport efficiencies delivered by the spatial strategy and the move to electric vehicles. The Local Plan does require applicants to integrate renewable technologies into developments but does not include a target limit.
- 9.79 Other material considerations of significance are that in February 2021 Buckinghamshire Council agreed to become carbon neutral by 2050. 60 actions have been agreed to support this. Whilst these actions principally relate to the Council's own estate, action 56 seeks to promote initiatives to reduce emissions from the private and third-party sector in Buckinghamshire. The scheme's contribution to the delivery of this commitment weighs in favour of the grant of planning permission on the Site.
- 9.80 Marlow Film Studios, which offers a rich mix of sustainability measures, is considered to significantly exceed the requirements of the council's adopted policies and will promote high levels of sustainability. In this regard it will help raise the standard for sustainability more generally in the area. In line with para. 134 of the Framework the sustainability credentials of Marlow Film Studios, which are an integral aspect of the design, should be afforded significant weight.

Appraisal of Sustainability

- 9.81 In support of the application an Energy Statement (Document 18) and Sustainability Statement (Document 17) has been prepared by AECOM. The Sustainability Statement summarises key sustainability measures that have been integrated into the design of Marlow Film Studios and how the design has addressed (and in many cases exceeded) relevant national and local planning policy requirements relating to sustainability. The Energy Statement sets out the proposed strategy for reducing the development's energy demands, utilising low carbon and renewable energy sources, and ensuring the development is enabled for net zero CO₂ emissions by 2050, as required by the Climate Change Act.

Energy and Carbon Emissions

9.82 Marlow Film Studios is designed to reduce all operational energy demands as far as is reasonably practicable through the use of high-performance building fabric, passive design, efficient building services and equipment, low carbon heat pumps/large PV arrays and energy metering, to allow ongoing monitoring and improvement.

9.83 Overall, the proposed energy strategy for the Site is:

- a) Efficient building fabric and services, with fabric elements designed to meet, and where possible improve upon, the national building fabric performance levels for Building Regulations 2021⁴⁴.
- b) Air source heat pumps (ASHP) to provide heating, and where required, cooling to the buildings on Site.
- c) Air Source Heat Pumps to provide hot water to the studio hub building.
- d) PV arrays on the roofs of sound stages and car parks (Total PV generation is estimated to be 3,479,598 kWh/year).
- e) Elimination of fossil fuel heating and cooling and use of all electric systems (with the exception of emergency standby generators) to enable the Marlow Film Studios to be zero carbon in line with the Government's plans to decarbonise the electricity grid by 2035.

9.84 This is estimated to generate -30.8 (tCO₂/year) or a 105% CO₂ saving (see table 2 below):

Baseline emissions (tCO ₂ /year)	Emissions after proposed energy strategy (tCO ₂ /year)	CO ₂ savings from energy strategy (tCO ₂ /year)	CO ₂ savings from energy strategy (%)
573.0	-30.8	603.8	105%

Table 2 CO₂ emissions and savings from proposed energy strategy⁴⁵

9.85 In effect the PV arrays will generate more energy than will be needed by the regulated energy needs of the building.

BREEAM Rating

9.86 The Building Research Establishment's Environmental Assessment Method (BREEAM) is the world leading and most widely used environmental assessment method for buildings. It sets the standard for best practise in sustainable design and is the defacto measure used to describe buildings environmental performance. Building projects are assessed against the following categories:

⁴⁴ See Table 1 on p.30 of the Sustainability Statement

⁴⁵ See Energy Statement prepared by AECOM for further details.

-
- a) management;
 - b) health and well being;
 - c) energy;
 - d) transport;
 - e) water;
 - f) materials;
 - g) waste;
 - h) land use and ecology;
 - i) pollution; and,
 - j) innovation

9.87 Marlow Film Studios is being assessed under v3.0 of BREEAM New Construction 2018. A number of pre-assessments have been undertaken and the proposed ratings are detailed in on p.46 of the Sustainability Statement. Designs have been developed to target ratings of very good or excellent under the BREEAM scheme.

Low Carbon Sustainable Transport

- 9.88 The scheme has been designed to ensure an attractive pedestrian, cycle, and scooter environment within the Site. Good quality cycle facilities, designed to comply with BREEAM standards⁴⁶, will be provided to encourage modal take up.
- 9.89 Walk and cycle connectivity to Marlow is proposed to be enhanced through direct delivery and/or financial contributions.
- 9.90 Marlow Film Studios will facilitate a significant uplift in the quality and quantity of public transport provision to the Site and surrounding area. This will include provision of a new bus service between High Wycombe and Maidenhead and a more localised shuttle bus service between Bourne End, Little Marlow, and Marlow. These new bus services will provide a direct, frequent, and high-quality service, targeted to capitalise on the current poor public transport connectivity between High Wycombe – Maidenhead and Marlow-Bourne End.
- 9.91 Electric vehicle charging infrastructure will be provided on Site to help support the shift from fossil fuels to electric vehicles. This will comprise 222 EV charging units with the remainder of the spaces being EV enabled.
- 9.92 The Sustainable Transport Strategy is designed to deliver a 60:40 mode share (i.e. 60% motor vehicle and 40% public transport/active travel). To ensure that this is successful a monitor and manage approach has been adopted, supported by Automatic Number Plate Recognition (ANPR) technology and a Mode Share Incentive Scheme (MSIS). This will include a financial bond (or other financial mechanism) to incentivise achievement of the mode share targets within identified timeframes ensuring the mode share target is met.

⁴⁶ BREEAM standards govern the number of cycle parking spaces required.

Water Efficiency

9.93 Marlow Film Studios has been designed to minimise water use. Potable water consumption within the buildings will be reduced through the provision of efficient sanitary fittings by at least 50% compared to the baseline building water consumption in line with the BREEAM NC 2018 credit Wat 01. This performance equates to 4 out of 5 credits. All buildings will be equipped with low water use fittings (low flush WCs, low flow showers, low flow taps, low water use urinals and leak detection). Water meters will be installed to prevent water wastage. Rainwater harvesting/recycling is also provided via combined smart attenuation and rainwater harvesting tanks. These measures, which would be captured through the BREEAM rating system, will ensure a high level of water efficiency relative to the baseline building control requirements.

Building/Site Design

- 9.94 The Site has been designed with sustainability in mind. Passive design features optimise the sustainability of the Site. These include:
- a) Extensive green infrastructure, including green Roofs on all soundstages, green walls on a number of facades and 32% canopy cover over the Site as a whole.
 - b) Office workshop spaces have been designed to provide flexibility for a range of fit out options including cellular and open plan configurations. This will ensure the long-term durability of the buildings and efficient use of the embodied energy over time.
 - c) South-east orientation of a large number of buildings on the Site. Solar glazing with low g-values will be used to manage solar glare in the summer months.
 - d) A fully integrated sustainable urban drainage strategy, which incorporates green/blue roofs, Swales/ponds/bioretenion systems and rain gardens. These sustainable urban drainage measures take the opportunities available for incorporating biodiversity and landscape features.
 - e) The Site has been designed to minimise cut and fill. The aim being both to minimise disturbance of the existing landfill materials and minimise or avoid the import or export of materials from the Site.
 - f) A biodiversity net gain (BNG) strategy that achieves the emerging national target of 10% BNG (on/off Site), and that has voluntarily set a higher target to achieve 20%.

Waste and Recycling

- 9.95 A sustainable Site Waste Management Plan (SWMP) and Operational Waste Management Strategy (OWMS) has been prepared by Watermans. The SWMP is attached at Appendix 12.4 of Environmental Statement. The OWMS is submitted as a stand-alone document (Document 16).
- 9.96 The SWMP demonstrates how Marlow Film Studios will promote sustainable management methods for waste and recyclables throughout the

construction demolition and excavation phases. It sets out a strategy of measures, targets, monitoring, and roles/responsibilities.

- 9.97 The OWMS addresses the day-to-day operations of the Site - the production stage, pre/post production stage, public spaces, backlot, and waste minimisation/prevention Activities.
- 9.98 These combined waste and recycling strategies will ensure the sustainable operation of the Site of the life of the use and minimise waste production.

Conclusion on Sustainability

- 9.99 The Local Plan policy requirement for on Site renewables and carbon reduction measures is limited. Buckinghamshire Council's sustainability policies are spatially led and rely to a large extent on transport related measures. Since the Local Plan was adopted, the Council has adopted several documents supporting a reduction in CO₂ (agreed to become carbon neutral by 2050). This is a new material consideration that weighs in favour of the scheme. National guidance also supports Council's adopting national standards (such as BREEAM), which is also a new material consideration since the preparation/adoption of the Local Plan.
- 9.100 In terms of precedent, local housing schemes in the Wycombe Planning Area have done little in terms of sustainability, reducing the CO₂ impact of development or on Site renewables beyond that required by Building Regulations. In line with para. 134 of the Framework the sustainability credentials of Marlow Film Studios, which are an integral aspect of the design, should be afforded significant weight. The delivery of this Site will serve to help raise the sustainability in design more generally in the area.

Pillar 4 - Ecology and Green Infrastructure

The relevant Development Plan policies are:

- CP10 (Green infrastructure and the natural environment),
- DM11 (Green Networks and Infrastructure)
- DM13 (Conservation and Enhancement of Sites, Habitats and Species of Biodiversity and Geodiversity Importance)
- DM14 (Biodiversity in Development), and
- DM34 (Delivering Green Infrastructure and Biodiversity in Development)

Planning Policy

- 9.101 Policy CP10 sets out the Council's strategic aims for enhancing green infrastructure and the natural environment to achieve a net gain in biodiversity.
- 9.102 Policy DM11 sets out the aims and objectives for managing improvements to the green infrastructure network.
- 9.103 Policy DM13 sets out protections given to sites and species of international and national importance. The policy sets out a sequential approach to address any potential direct or indirect harm to non-statutorily designated sites.

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- 9.104 Policy DM14 states that development should be designed to maximise biodiversity by conserving, enhancing, or extending existing resources or creating new areas of features.
- 9.105 Policy DM34 requires developments to protect and enhance both biodiversity and green infrastructure features and networks both on and off site for the lifetime of the development. It requires a proportionate evidence-based approach, provided through the preparation of an ecological assessment, setting out how the aims of the policy will be achieved. The policy requires long term management and maintenance of green infrastructure and biodiversity assets.

Appraisal of Ecological Impacts and Mitigation

- 9.106 Ecology is addressed in Chapter 14 of the Environmental Statement prepared by Waterman (Competent Experts). Relevant appendices include the Preliminary Ecological Appraisal and a full suite of surveys⁴⁷ (attached at Appendix 14 of the ES).
- 9.107 An ecological assessment has been undertaken to evaluate the potential impacts of the Development upon ecologically designated sites as well as those habitats and species present within the Site and immediate surrounding area. The assessment has been undertaken in accordance with the current industry standard Guidelines for Ecological Impact Assessment (CIEEM, 2018).
- 9.108 To fully assess the baseline position, a series of desk-based and field-based surveys have been undertaken to identify any ecological constraints, including the presence of Important Ecological Features with the potential to be significantly affected by the Development. As a result of these surveys, several notable habitats in the form of wet woodland; lowland mixed deciduous woodland; hedgerow; and eutrophic standing water have been identified, together with the presence of foraging and commuting bats; notable breeding and wintering bird species; several notable species of terrestrial invertebrate, reptiles, and European eel. The Site itself is not covered by any statutory designations for nature conservation. However, a number of statutorily designated sites are present within the local area. Marlow Gravel Pits Biological Notification Site, a non-designated ecology asset, covers Plot 5 (in the southern part of the Site).
- 9.109 Construction and operational activities have been assessed as having the potential to significantly affect notable habitats and faunal species present within, and immediately adjacent to, the Site. This is a result of habitat loss, disturbance, and potential pollution events. The implementation of mitigation measures for the protection of ecological resources such as appropriate fencing and measures to control lighting, noise, vibration, and surface run-off (to be outlined within the CEMP), together with the retention and enhancement of notable habitats, will reduce the adverse impacts to a non-significant level. However, even with mitigation in place, temporary adverse

⁴⁷ Surveys: National Vegetation Classification, aquatic life, batches, bats, breeding birds, great crested newts, reptiles, terrestrial invertebrates, water vole and otters and wintering birds.

impacts will likely be experienced by fauna during construction until the enhanced and newly created habitats become sufficiently established.

- 9.110 In the long term, enhancement of retained habitats and the creation of new ecologically valuable habitats, including the provision of features for roosting bats, nesting birds and invertebrates, details of which are capable of being secured via planning condition. Marlow Film Studios will optimise the ecological potential of the Site, whilst securing necessary economic development. An on/off Site biodiversity net gain which achieves the emerging national requirement of 10%, and the project's own voluntary target of +20% net gain will be provided. The habitat provided will be covered by a 30-year conservation covenant and meet the standards of the coming statutory framework once passed into law.
- 9.111 In order to maximise biodiversity within the Site the development includes the following enhancements to the existing habitats and interventions in the built environment:
- a) A landscape strategy, which seeks to preserve existing trees and habitats where practicable and to maximise biodiversity.
 - b) Creation (through enhancement of existing environmental assets) of significant areas of bio-diverse habitat on Plots 4 and 5.
 - c) Management of existing flora on the Site to encourage a more diverse age structure.
 - d) Removal of Japanese knotweed and Cotoneaster.
 - e) Under storey seeding in wooded areas.
 - f) Seeding of species rich grasslands.
 - g) Enhancement of the scrub/grassland mosaic habitats.
 - h) Green roofs.
 - i) Street trees with understory planting.
 - j) A landscaping scheme, which favours native species and species that benefit biodiversity.
 - k) Rain gardens/biodiverse SUDs features.
 - l) Species rich ornamental shrub and herbaceous planting.
 - m) Species rich Meadow planting.
 - n) Species rich climbers.
 - o) Mixed scrub planting.
- 9.112 When considering Marlow Film Studios in context, and with the proposed mitigation, it is considered that it complies with the provisions of the Development Plan and the Framework.

Green Infrastructure Network

- 9.113 The southern part of the Site (Plots 4 & 5) is designated as part of a wider Green Infrastructure Network. Policy DM11 requires development proposals to pay special attention to the conservation and enhancement of biodiversity, recreation, and non-motorised access. Green infrastructure areas are not intended to introduce a moratorium on development, but rather ensure the development that does take place has regard to the physical and functional value of important green infrastructure links.

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- 9.114 The majority of the development associated Marlow Film Studios is located to the north of the designated Green Infrastructure area. Within the designated Green Infrastructure Area the majority of the existing green/blue habitat will be preserved and enhanced. Plot 4 will also be opened up for recreational purposes⁴⁸ and non-motorised access will be enhanced through the provision of upgraded fully accessible footpaths⁴⁹ with enhanced links to Marlow by non-vehicular modes. Therefore, the role that Plots 4 and 5 play in the Green Infrastructure Network, will be preserved/enhanced.
- 9.115 In addition, through the implementation of the proposed landscape strategy important new green infrastructure links will also be created between the designated green infrastructure area and the Chilterns AONB to the north.
- 9.116 Therefore, Marlow Film Studios complies with the provisions of policy DM11 and will continue to provide strong and continuous links to the surrounding parts of the identified green infrastructure network.

Biological Notification Site (BNS)

- 9.117 The Marlow Gravel Pits BNS is a non-statutorily protected site that was primarily designated based on its wetland bird interest. Neither the breeding bird survey, nor the wintering bird survey, identified areas within Plot 5 as being used by significant numbers of wetland birds. The activity of wetland species is primarily focused on the surrounding water bodies, which are well-buffered from the Development. Chapter 14 of the Environmental Statement notes that there is some potential for clearance and construction activity to result in disturbance to bird populations making use of Westhorpe Lake, and other large water bodies within the BNS to the east. However, due to the retention of significant habitat buffers to large water bodies, which will reduce the levels of potential disturbance, the impact was not considered to be significant. Therefore, while there will be a localised impact on the BNS in the short term, when Marlow Film Studios is constructed, this is capable of being controlled through responsible management and onsite mitigation (i.e. Construction and Ecological Management Plan). The operation of the Site is also capable of being controlled and any impacts mitigated through the preparation of a Backlot Operation Management Plan and a lighting strategy/lighting management plan. Taken in the round, Marlow Film Studios impact on the BNS, is considered to be acceptable.
- 9.118 It is also notable that policy DM13 recognises that Biological Notification sites have not been fully reviewed as part of the local wildlife site identification process (para. 6.79). In view of the recent survey findings, the BNS may need its boundary to be redrawn to omit much of Plot 5.

Biodiversity Net Gain (BNG)

- 9.119 Policy CP10 seeks to ensure that there is a net gain in biodiversity within individual development proposals. Policy DM34 requires development to ‘*deliver long lasting measurable net gains in biodiversity*’. Neither policy DM13

⁴⁸ Permissive

⁴⁹ Permissive

nor DM34 requires a specific net gain and therefore a 1% net gain would, in principle, fulfil the requirements of the policy.

- 9.120 A Biodiversity Net Gain Assessment has been prepared by Waterman (Document 25) and submitted as part the application documentation. This document should be read in conjunction with the accompanying Biodiversity Metric Tool 3.0 (Ref: WIE18037-103-XLS-1-1-1-BNG), also prepared by Waterman.
- 9.121 There are 210.42 Biodiversity Units (BU) within the redline boundary as measured under DEFRA metric 3.0. This is the 'baseline' used for calculations of biodiversity impacts.
- 9.122 Coming legislation means that any qualifying development will in future be required to deliver biodiversity net gain. It is expected that Parliament will amend the Town & Country Planning Act to mandate 10% net gain for applications made after the autumn of 2023.
- 9.123 Despite being submitted ahead of the legislative framework, Marlow Film Studios will not only deliver biodiversity net gain in line with the emerging national requirement of +10%, but in addition has set voluntarily its own bespoke target to reach +20% net gain.
- 9.124 The site masterplan shows a net loss within the red line boundary of -22.84 Biodiversity Units (Bus) (-10.85% from the baseline). The two main components are:
- The removal of 24.55 Ha of lower value ground cover, largely over landfill caps, in plots 1 to 3 resulting in a loss of -105.36 Bus.
 - Enhancements within the site boundary in areas which offer the best current and potential habitats will deliver +82.52 Bus.
- 9.125 A net loss of 0.13 hedgerow biodiversity units (hBUs) of -1.51% is also anticipated.
- 9.126 To achieve the emerging national requirement of 10%, and our own voluntary target of +20% net gain, additional land will be secured by appropriate planning mechanism. The habitat provided will be covered by a 30-year conservation covenant and meet the standards of the coming statutory framework once passed into law.
- 9.127 This approach offers a significant additional ecological improvement and sets a bold new benchmark for other development more generally to aspire to. This should be afforded significant weight in the balance of the decision making.

Habitat Regulations Assessment (HRA)

- 9.128 A Shadow Habitat Regulations Assessment (Document 26) (May 2022) has been prepared by Waterman and submitted as part the application documentation.
- 9.129 This document provides all relevant information to inform an HRA to be carried out according to the statutory procedures laid out in the Habitats

Regulations 2017, as amended, using the methodology laid out in the Habitats Regulations Assessment Handbook. The outcomes allow the following conclusions to be drawn:

- a) In terms of recreational pressure at Burnham Beeches SAC, it is considered that likely significant effects can be ruled out either alone or in-combination. No further assessment is needed.
- b) In terms of air pollution at Burnham Beeches SAC, it is considered that likely significant effects can be ruled out alone or in-combination. No further assessment is needed.
- c) In terms of water abstraction at Burnham Beeches SAC, it is considered that likely significant effects can be ruled out alone or in-combination. No further assessment is required.
- d) In terms of recreational pressure on the Bisham Woods component of the Chilterns Beechwoods SAC, it is considered that likely significant effects can be ruled out alone or in-combination. No further assessment is required.
- e) In terms of air pollution on the Bisham Woods component of the Chilterns Beechwoods SAC, it is considered that likely significant effects could not be ruled out in-combination. An appropriate assessment is required.
- f) In terms of mobile species (stag beetles) at the Bisham Woods component of the Chilterns Beechwoods SAC, it is considered that likely significant effects could be ruled out either alone or in-combination. No further assessment is needed.

- 9.130 Accordingly, the only factor requiring appropriate assessment was the potential impact of air pollution on the woodland qualifying feature of the Bisham Woods component of the Chilterns Beechwoods SAC.
- 9.131 Air quality analysis has showed that adverse effects on the integrity of the Bisham Woods component of the Chilterns Beechwoods European site could be ruled out. Although, the Development will lead to some increases in airborne pollution these either did not exceed established thresholds (i.e. NO_x, ammonia, and acid) or where these are exceeded (i.e. nitrogen), exceedances are modest, effects on the ground would not be visible or measurable and it is implausible that the objectives to secure the species composition, distribution and abundance of the beech forest could be compromised. Such outcomes are supported by Natural England's advice provided on the HRA of the Local Plan.
- 9.132 The HRA concluded there are no adverse effects on the integrity of Chilterns Beechwoods.

10.0 Development Management Assessment

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Green Belt and Sustainability of the Location

The relevant Development Plan policies are:

- CP1 (Sustainable Development)
- CP2 (Overall Spatial Strategy)
- CP3 (Settlement Strategy)
- CP5 (Delivering Land for Business)
- CP8 (Protecting the Green Belt)
- DM1 (Presumption in Favour of Sustainable Development)
- DM20 (Matters to be determined in accordance with the national planning policy framework)
- DM42 (Managing Development in the Green Belt)

Green Belt

- 10.1 The Site is identified as located within the Green Belt as set out in the Proposals Map which accompanies the Local Plan. Policy CP8 sets out the Council's approach to protecting the Green Belt. Policy DM42 links to the Green Belt policy position in the Framework and provides additional clarification on the types of development that are considered to be appropriate in the Green Belt. Marlow Film Studios does not fall within any of the types of development that are deemed to be appropriate in the Green Belt as set out in policy DM42 or the Framework. Very special circumstances (para. 147 of Framework) will therefore need to be demonstrated.
- 10.2 Therefore, whilst the starting point is that Marlow Film Studios as a whole constitutes inappropriate development in the Green Belt, once other material considerations are taken into account, the Green Belt harms, and any other harms, are clearly outweighed. A full assessment of the harm to the Green Belt and the case for very special circumstances is set out in full in Section 11.0 of this Report.

Sustainability of the Location

- 10.3 Notwithstanding the accepted conflict with Green Belt policy Marlow Film Studios is considered to fit comfortably with the overall spatial strategy and vision for the area.
- 10.4 The vision for Wycombe (and the surrounding areas) is that it is:

“Economically strong and the place to live work and visit” (Para. 3.1 of the Local Plan)

A supporting objective is to:

“Foster the economic strength of the M40/A404”

Being located adjacent to the A404, Marlow Film Studios will harness and enhance the economic strength of this corridor and provide good quality jobs that will be accessible to local people and supported by a local skills, training, and construction package. Marlow Film Studios will contribute to the Council's core vision, by enhancing the economic strength of the area and making it a better place to live, work and visit.

- 10.5 The overall spatial strategy (Policy CP2) recognises the importance of delivering most of the employment land in the four largest settlements in the planning area. These settlements, which include Marlow, are the focus of new development because they are recognised as having the widest range of facilities and the best provision of public transport and therefore represent the most sustainable locations for new development (see para.4.14 of the Local Plan). Notably, with particular regard to Marlow, the Local Plan states:

“the AONB, green belt and flood constraints mean that Marlow has considerably less development than would otherwise be envisaged for a town of its size.” (Para. 4.14)

This Planning Statement robustly demonstrates that through outstanding design, the incorporation of strong structural planting, a hierarchical approach to sustainable urban drainage and good planning, that the impact on the Green Belt and Chilterns AONB is capable of being managed and minimised, any impact on flood risk remains low and that very special circumstances exist, which will outweigh any remaining harms. Therefore, it is appropriate, in the interests of sustainability, to optimise Marlow’s acknowledged potential to accommodate additional development.

- 10.6 Policy CP5 recognises the need to deliver land for business. The policy seeks to ‘encourage a range of employment on new and existing employment areas that deliver B use classes or similar sui-generis uses’. The supporting text for the policy recognises that ‘The District, and particularly the southern half [this would include the application Site], is well located and connected to secure further economic development’ (para. 4.53). The economic projections for the Wycombe planning area are set out in the table below:

	Demand (sqm)	hectares
B1a/b Office	+68,000	+14
B1c/ B2 Industrial	-48,000	-12
B8 Warehousing	+34,000	+7
Total	+54,000	+8

Table 3 – Economic Forecast for office, industrial and warehousing uses over plan period (Table 8, p59 of Local Plan).

- 10.7 Notably the figures indicate increasing demand for employment floor space (+54,000 sqm – an estimated land take of +8 hectares). This comprises a reduction in B1c and B2 (-48,000) industrial floor space and an increase in B1 office (+68,000) and B8 (+34,000) warehouse space. The shortfall in employment land is sought to be addressed in several ways including the release of Greenfield sites in the Green Belt. The application Site was considered for release as part of this process and included in early consultation, but ultimately was not taken forward in favour of employment land being delivered in the north of Buckinghamshire in the administrative area of Aylesbury. The Sustainability Appraisal cites concerns in respect of

the impact on the Green Belt and the potential for the Site to undermine the deliverability of other allocated office Sites in the Local Plan⁵⁰. Notably Marlow Film Studios is not for dedicated office space and the delivery of a film studio was not considered by the Council in preparing the Local Plan as it was not a use being formally promoted at that time.

- 10.8 Notwithstanding the provisions made for employment land within the former Wycombe District, there is a significant shortfall in the supply of sites available of about 10 hectares, when losses are considered. The unmet employment needs are proposed to be met on the land in the north of Buckinghamshire, in the Aylesbury Planning area. Whilst at the time the Local Plan was adopted, the acknowledged disequilibrium between housing and employment was accepted, this clearly performs poorly in sustainability terms and will lead to poor productivity and excess commuting in the medium to long term. In a scenario where the Green Belt and other planning harms are capable of being mitigated through good design and/or very special circumstances exist (as is the case here), it would clearly be more beneficial for the Wycombe planning area to achieve equilibrium between population and employment generation, thereby reducing the need to commute.
- 10.9 For reasons that are set out in full in the Economic Report, a new film and television studio is not a footloose employment proposition, it needs to be located within the established West London Cluster of existing film studios, which includes south but not north Buckinghamshire. Therefore, in the event planning permission is not secured for the proposed development, the economic benefit and opportunity for south Buckinghamshire to achieve a sustainable balance between employment and homes would be lost. This is an opportunity that cannot be exported to the north of Buckinghamshire. The opportunity to achieve sustainability would simply be lost to Buckinghamshire as a whole, and potentially the UK given the international competition for such facilities.
- 10.10 Most of the former Wycombe District's employment opportunities are proposed to be delivered through Office Development (68,000sqm) and Warehousing (34,000 sqm). The most up-to-date Housing and Economic Development Needs Assessment (HEDNA) indicates that currently demand for office space is weak but demand for industrial land is stronger than indicated in the headline HEDNA forecast. The Local Plan acknowledges that meeting the needs of the office sector is likely to be challenging (Para. 4.61) and that a flexible approach needs to be taken to allocating employment sites and the situation needs to be closely monitored and managed through plan reviews (para. 4.63). The changes to the office sector, which have been brought about in recent years and made worse by COVID, are likely to have exacerbated this issue. This issue will need to be closely monitored over the next few years. Given that office development yields a very high level of job creation relative to other forms of employment this affects future land demand and the likely need for further employment allocations in the future. Marlow Film Studios has the potential to deliver a high density of jobs (relative to warehousing), which will support the Council

⁵⁰ See Page 53 of the Sustainability Appraisal (Sept 2017)

in meeting future job needs in southern Buckinghamshire with the minimum allocation of additional land.

- 10.11 If the office market does not recover, it will be necessary for the new Buckinghamshire Local Plan (or any review of the current Local Plan) to make significant new employment allocations. The future of the employment market in south Buckinghamshire and the ability of the Local Plan to address those needs will be closely monitored. In the event the employment policies are found to be out-of-date this will need to be weighed against any harms arising from the scheme.
- 10.12 When considered as a whole, the Adopted Local Plan whilst identifying clear policies of restraint, particularly in respect of the Green Belt, recognises the importance of the economy and the contribution that the area in the south of Buckinghamshire (which includes the application Site) can make to the long-term sustainable development of the area, particularly those areas well connected to the M40/A404.
- 10.13 Furthermore, the potential of this area for studio development has also been identified in the LEP's Economic Recovery Plan (as referenced earlier in this Statement), wherein it specifically states support for new studio development at Marlow.

Sequential Assessment

- 10.14 There is no Development Plan or Framework requirement for Green Belt development to be sequentially tested. However, to demonstrate the absence of a sequentially more preferable Site a Sequential Assessment (Document 4) was undertaken by Arrow Planning. This has been submitted as a separate document with the planning application.
- 10.15 The Sequential Assessment sets out: central government guidance on the preparation of sequential tests; the critical site search parameters such as minimum site size; the methodology; and site assessment. It also addresses a number of alternative sites put forward by officers at BC.
- 10.16 The Sequential Assessment and accompanying technical note prepared by Volterra51 demonstrates that there is a clear and compelling need for additional film and high-end TV production space in the UK, with a particular focus on the West London cluster.
- 10.17 The methodology and site assessment were carried out as a five-stage process. The search area is defined as the West London Cluster, with 33 local planning authorities identified within the search area. Authorities within London were screened out because of concerns in respect of Availability and Achievability.
- 10.18 The initial site search identified ninety-one potential sites of an appropriate size. The first site sift, which considered proximity to settlements and the damaged nature of the land, reduced the number of sites from ninety-one to twenty. The second stage, more detailed site sift, which considered

⁵¹ Attached at Appendix 2 of the Sequential Test

achievability, availability, Chilterns AONB and Flood Risk, reduced the number of potentially deliverable sites to two. These two sites were assessed against nine planning site suitability criteria and separately against six operator suitability criteria. In both cases the Marlow Film Studios Site was identified as the sequentially most preferable Site in the West London cluster.

- 10.19 The Sequential Assessment demonstrates that the application Site, when assessed against the criteria of being achievable, available, and suitable, is one of only two potentially deliverable sites within the West London Cluster. Of these two sites the application Site was assessed as being the sequentially most preferable site where the benefits that will flow from the development can be secured.
- 10.20 The Sequential Assessment concludes that there are not any sequentially preferable sites within the identified search area. Therefore, the sequential test is passed.
- 10.21 The application Site is the sequentially most preferable Site within the West London Cluster to deliver a new studio that will meet the clearly identified need for studio space. It is also the sequentially most preferable Site to capture the benefits that would flow from such a development. Failure to build the new studio at Marlow will lead to a loss of those benefits, most notably the local and national economic benefits.

Country Park

The relevant Development Plan policies are:

- RUR4 (Little Marlow Lakes Country Park)
 - Little Marlow Gravel Pits SPG
- 10.22 Policy RUR4 (Little Marlow Lakes County Park) allocates an area of 329ha between Bourne End and Marlow, which includes the application Site, a number of residential dwellings and a sewage works, for outdoor recreation. The allocation is not itself the vehicle for providing for a Country Park – that is the 1968 Countryside Act, which is addressed in more detail below. The policy RUR4 creates a permissive environment for planning applications for publicly accessible open space, biodiversity enhancements, car parking, public access for pedestrians and cyclists and supporting development/infrastructure, including the potential for development to the West of Crowne Plaza.
- 10.23 Policy RUR4, and the creation of a Country Park, is stated as being necessary to offset the impact on Burnham Beeches (an area of special conservation), which is itself necessary to mitigate the impact of development in south Buckinghamshire allowing a number of strategic sites to come forward.
- 10.24 The aspiration to create a large recreational area and/or Country Park is a long-standing policy objective of the Council spanning multiple decades and Local Plans, but to-date has gained little (if any) traction on the ground. The absence of delivery has been driven by fragmented landownership and financial issues, both of which are incapable of being addressed without finance and compromise. The vast majority of land within the allocation area (c. 83%) is within private ownership, with multiple landowners. At the time

the policy was adopted the then Wycombe District Council did not own or control any land within the RUR4 allocation⁵². Some land was held in trust by then Buckinghamshire County Council⁵³. Due to the delivery issues associated with this policy it is largely out-of-date; although, it is acknowledged that pockets of recreational use within the allocated area could be achieved.

- 10.25 The policy is supported by the Little Marlow Gravel Pits SPG. This document was published in 2002, some 20 years ago, under a much earlier Local Plan. The supporting text to policy RUR4 (para. 5.5.27), whilst requiring development proposals to take the SPG into account, recognises that the SPG needs updating.
- 10.26 The SPG sets out the background of the allocation and acknowledges the significant land ownership constraint to delivery of a Country Park. It appraises the landscape, ecological, contamination and hydrological constraints on the Site. The SPD identifies the need for improved access (by all modes), increased parking provision, the need for public transport, the provision of facilities that meet the needs of the local community and restoration of areas degraded by gravel extraction (paras. 4.2.3 and 4.3.1).
- 10.27 The SPD makes clear (para. 5.1.1) that it does not alter Green Belt policy however it does recognise that when interpreting these policies consideration will need to be given to how an individual proposal helps to achieve the overall objectives of the Country Park. It recognises there may be special circumstances where some limited, small scale, related enabling development may be justified. The SPG recognises that finance from development can help cross fund and enable elements of the Country Park to be delivered.
- 10.28 Para. 5.1.4 advises that the Council will not be implementing the SPG masterplan directly, but rather will look at working with landowners/developers to bring proposals forward. The SPG recognises the difficulties of bringing the allocation forward given the multiple land ownerships and the fact that many of the activities would not be profitable and therefore there would be no incentive for landowners/developers to implement them (para. 6.1.3).
- 10.29 In terms of delivery, the SPG recognises the role of planning conditions and legal agreements in securing benefits on planning permissions, which are contrary to Green Belt policy. The SPG, whilst in need of updating, clearly acknowledges some of the difficulties in delivering the Country Park and the contribution development can make to resolving this issue.
- 10.30 The Countryside Act 1968 sets out the legal powers to provide a Country Park. Section 7(3) of the Act states:

⁵² Spade Oak was purchased post adoption of the Local Plan.

⁵³ Thameside Preservation Trust holds land between the Railway and River near Spade Oak Lake. Buckinghamshire County Council is named as the sole trustee on the Charity Commission website.

- (3) The powers conferred by the foregoing provisions of this section and by the next following section may be exercised by the local authority—
- (a) on land belonging to them, or
 - (b) on such terms as may be agreed with the owners and any other persons whose authority is required for the purpose, on other land,
- and an agreement under paragraph (b) above may provide for the making by the local authority of payments in consideration of the making of the agreement and payments by way of contribution towards expenditure incurred by the persons making the agreement in consequence thereof.

10.31 Only 16.75% of the allocated land for the Country Park belongs to Buckinghamshire Council. The remaining 83.25% is in private ownership. The application Site comprises 11% of the Country Park area.

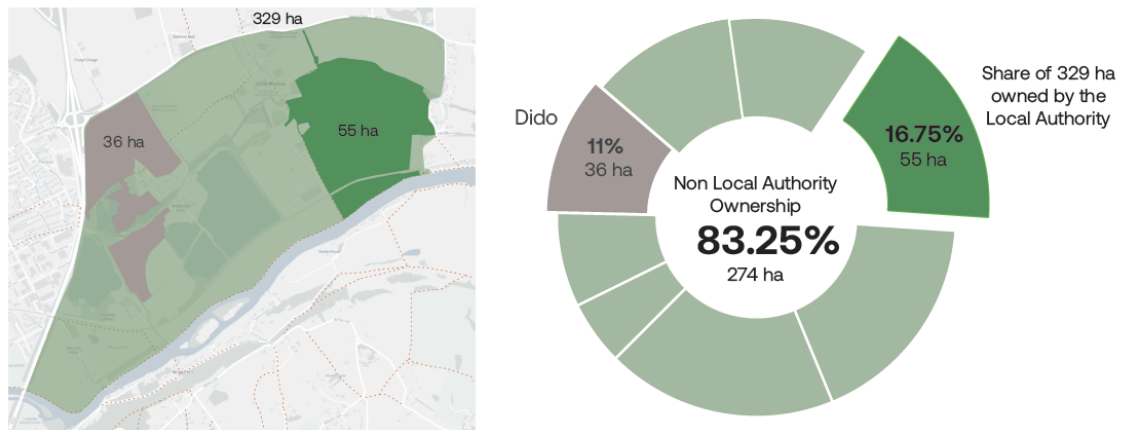


Fig 3: Buckinghamshire Council and Applicant land ownership of land designated under RUR4.

10.32 In the decision that the Council took when adopting the Local Plan to make provision for the Country Park, it acknowledges that the Council would need to facilitate its delivery. The Council bought Spade Oak Lake in February 2020, but no plan relating to land in private ownership has been prepared, nor agreed, with the landowners, as required by the 1968 Act. It would seem that the Council has some doubts over the status of the park⁵⁴. In the absence of owning the land, the Council will be unable to act unilaterally and create a Country Park. Therefore, at the present time, as a matter of fact, there is no 'Country Park' covering the area of RUR4.

10.33 Given the:

- a) known fragmented land ownership;
- b) the absence of any incentive for landowners to contribute to the Country Park;
- c) the likely financial and legal liabilities of contributing to the Country Park;

⁵⁴ Answer given by Cllr John Chilver, Cabinet Member for Finance, Resources, Property and Assets, on behalf of Cllr Gareth Williams, Deputy Leader and Cabinet Member for Planning and Regeneration, in response to a question from Cllr Stuart Wilson to Buckinghamshire Cabinet on 1 March 2022

d) the absence of any known financial mechanism to purchase the land, restore it to a safe condition and undertake the necessary upgrades; and,

e) capital infrastructure investment required to deliver a Country Park,

it would seem most unlikely that the 'Country Park' vision will ever be realised.

10.34 On this basis it is not considered that there is any loss of designated outdoor recreation space or Country Park. Indeed, any contribution that Marlow Film Studios can make to the Council's Country Park aspiration is a planning benefit that weighs towards the grant of planning permission.

10.35 A film studio, whilst not envisaged at the time policy RUR4 or the Little Marlow Gravel Pits SPG was prepared, has the potential to make a contribution towards the aims and objectives of policy RUR4, and to support a country park if in due course it is realisable, in the following main ways:

- a) Over a quarter of the Site area will be made available for quiet recreation (Plot 4)⁵⁵ or exclusively (save for Backlot) for wildlife (Plot 5);
- b) It will provide an area of quiet open recreational space on Plot 4, which can deliver controlled public access.
- c) It will deliver significant biodiversity gains through enhancements both on and off-site, including on Plots 4 and 5. These will enhance biodiversity in the RUR4 allocation and contribute to existing green infrastructure corridors offering wider connectivity benefits for ecology.
- d) The provision of a mixed-use building on Plot 4 for cultural, educational, and recreational uses in connection with the film studio and wider public uses.
- e) A Café will be provided on Plot 2A to facilitate public enjoyment of the area;
- f) It will improve access to the land for pedestrians, cyclists, and motorists. The Volvo bridge will remain for pedestrians. A new level access to Fieldhouse Lane for pedestrians and cyclists has the potential to be funded through S106 contributions as part of a wider accessibility/sustainable travel contribution. A cycle and walking route will be provided from the Volvo bridge north to the A4155. The Public Right of Way will be upgraded (resurfaced and widened with low level lighting) to facilitate use (walk/cycle) and make it safer; this will link to upgrades already proposed by Buckinghamshire Council, which together will provide a good quality link between Marlow and Bourne End through the RUR4 allocation. A new walk/cycle route will

⁵⁵ On a permissive basis

be created between the Volvo Bridge and the Site access adjacent to the A404.

- g) Plot 4 will include links to the surrounding informal footpath network, thereby enabling connections to the wider RUR4 allocation and key water features including the River Thames.
- h) It will deliver on Site parking, which could be made available outside of core working hours for the public in connection with the recreational use of the wider land.
- i) Through good design and a sensitive architectural approach the impact on the surrounding landscape and sensitive historic receptors can be minimised.

10.36 In summary there would be no loss of outdoor recreational space or Country Park, because neither presently exists on the Site (outside of the Public Right of Way) and both would be unachievable now and in the future due to the multiple land ownerships. However, through the grant of planning permission and the use of conditions, and a legal agreement, Marlow Film Studios has the potential to make a contribution towards the delivery of recreational space and therefore the Council's core objective. Marlow Film Studios will also provide links through the Site and to Marlow, to accord with the wider aspiration of improving connectivity. This is considered to represent a significant benefit weighing in favour of the grant of planning permission.

Landscape and Visual Impact

The relevant Development Plan policies are:

- CP10 (Green Infrastructure and the Natural Environment)
- DM30 (The Chilterns Area of Outstanding Natural Beauty), and
- DM32 (Landscape Character and Settlement Patterns)

10.37 Policy CP10 advises taking a landscape character-based approach to considering proposals. Policy DM32 requires developments to evidence a thorough understanding of the landscape and demonstrate a positive response to its attributes. The policies do not introduce a moratorium on building on greenfield sites, but rather advocate the need for a landscape informed approach.

10.38 In support of the application a Landscape and Visual Impact Report (April 2022) has been prepared by Gillespies (Ref: P20514-00-001-GIL-070). It is enclosed in Volume 3 of the Environmental Statement. It reviews the existing baseline conditions, assesses the potential effects, and outlines design and mitigation proposals incorporated as part of the overall Proposal.

10.39 The main conclusions of the Landscape and Visual Impact Report are:

Landscape Sensitivity - The Site is considered to be of medium / low landscape value furthermore it is considered that the Site has a low susceptibility to the proposed change brought about by the proposed scheme. Therefore, the low susceptibility to the proposed development,

combined with the medium/low value of the Site, means that the overall sensitivity of the Site to the Marlow Film Studios is assessed as low.

Vegetation – Direct Effects - The majority of the existing vegetation on the Site would be retained, which limits the direct effect on existing vegetation.

Character of the Site – Direct Effects - The landscape sensitivity of the Site to the development is assessed as low. The magnitude of effects on the character of the Site is assessed as high. Based on the low sensitivity of the Site and high magnitude of landscape effects the overall level of landscape effects on the Site is assessed as being medium and of moderate adverse significance over the medium and long term.

Viewpoints - 28 viewpoints were identified within the 3 km study area. These viewpoints encompassed residential areas, public viewpoints, transport routes and places of work and were located at varying distances from Marlow Film Studios.

Views from the north - Development is visible behind the line of existing poplar trees which will be augmented with additional planting. Green Biosolar roofs have been integrated on the sound stage roofs, building heights stepped down and roof lines articulated with pitched roofs on the northern edge, to break up massing and integrate into the landscape context. PVs are orientated southwest away from the AONB, which minimises potential for glare.

Views from the east – Upper levels of the development visible behind the line of existing Leylandii trees along the edge of the sports field adjacent to Westhorpe Farm Lane. Behind this (not visible in the view) on the west side of Westhorpe Farm Lane new planting is proposed to strengthen the existing elm hedge and provide additional on-site screening. The southerly three soundstage facades have ground based green walls facing Little Marlow. The façade cladding colour has been selected to blend into the landscape context.

Views from northwest (Chilterns AONB in vineyard) – Existing mature trees are retained whilst new infill tree planting is proposed to the northwest to provide a more continuous buffer to the AONB. The façade cladding colour for upper building levels has been selected to blend into the landscape context. PVs are orientated southwest away from the AONB, which minimises potential for glare.

View from the footbridge over the A404 (Volvo Bridge) - Existing mature trees are retained whilst new infill tree planting is proposed which allows some views through the tree line. Green walls have been integrated into the sound stages facing the A404.

Views from Winter Hill (from the south) - Upper levels of buildings and roofs on plots 1-3 would be visible above the existing tree line which screens parts of plots 1,2 and 3. Biosolar green roofs have been integrated on the sound stages and the façade cladding has been selected to blend the visible components into the landscape context.

Building heights have been stepped down to the southern edge of plots 2 and 3 and roof lines articulated with pitched roofs to break up massing and integrate into the landscape context. PVs are orientated southwest rather than due south to minimise potential for glare. New woodland buffer planting is proposed to plot 5 to screen the backlot.

Views from Westhorpe Farm Lane - New woodland buffer planting is proposed to assist in screening the development. Building heights have been stepped down to the southern edge of plots 2 and roof lines articulated with pitched roofs to break up massing and integrate into the landscape context.

- 10.40 The Landscape and Visual Impact Report, prepared by Gillespies, demonstrates that based on the low sensitivity of the Site and high magnitude of landscape effects, the Site is assessed as being medium and of moderate adverse significance over the medium and long term. It is acknowledged that this visual and character harm is a negative aspect of the proposal. However, it should also be acknowledged that a degree of harm is inevitable on any greenfield site and that the proposal has taken the opportunities available (through good design and the retention/enhancement of existing landscaping) to minimise the impact of the development.
- 10.41 The Landscape and Visual Impact Report and Design and Access Statement, demonstrate the positive approach that has been taken to understanding the landscape and how the Marlow Film Studios can minimise its impact on its key attributes (as summarised above). Therefore, whilst Marlow Film Studios has adhered to policy insofar as it has adopted a positive approach to be understanding and complementing the landscapes attributes, it remains that the resulting impact is still of moderate adverse significance.

Flooding and Drainage

The relevant Development Plan policies are:

- CP7 (Delivering the Infrastructure to Support Growth)
- DM39 (Managing flood risk and sustainable drainage systems)

Flooding

- 10.42 Policy CP7 of the Local Plan sets out the requirement for new development to include flood management measures such as sustainable urban drainage systems and their long-term management and maintenance.
- 10.43 Policy DM39 of the Local Plan seeks to:

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- a) direct development to areas with the least risk of flooding;
 - b) avoid inappropriate development in areas with a high risk of flooding;
 - c) safeguard the functional flood plain;
 - d) apply the sequential test to development in areas at risk of flooding and the exceptions test where appropriate; and
 - e) requires Flood Risk Assessments to be provided on sites at risk of flooding or greater than 1 hectare in area.

10.44 A Flood Risk Assessment has been prepared by AECOM (Document 10) to accompany the application. Chapter 13 of the Environmental Statement also considers the matter. The Flood Risk Assessment sets out a description of the Site as existing, the planning policy position at the local and national level, Site flood risks from all sources, the residual flood risk, and conclusions/recommendations. In summary:

- a) The majority of the Marlow Film Studios Site is categorised as “less vulnerable”.
- b) The majority of the Site is in Flood Zone 1, or areas of equivalent flood risk. Whilst some parts of the Site (i.e. the peripheral recreational parts of Plot 4 and most of Plot 5) are identified as falling within Flood Zone 2 or 3, it has been demonstrated by undertaking up-to-date topographic surveys that the land levels are higher than indicated on the historic Environment Agency flood risk mapping (c.1.5 metres for Plot 5) (see para. 4.4 of Flood Risk Assessment). Therefore, flood risk on the developed parts of the Site is low and sequentially comparable to Flood Zone 1. As such no sequential test is necessary. The proposed bridge, meanwhile, is not assessed as leading to an increased flood risk. Therefore, there is a low residual risk from fluvial sources.
- c) The groundwater flood risk is assessed to be high/medium but is capable of being mitigated as part of the sustainable urban drainage strategy. Therefore, there is a low residual risk from groundwater sources.
- d) The flood risk from surface water has been assessed as low.
- e) The flight risk from surface and foul water has been assessed as medium. To mitigate this risk no surface water will be discharged to an adopted sewer, and there is, therefore, a low residual risk.
- f) A sequential approach has been adopted to Site layout by directing the most vulnerable uses to areas of the Site with the lowest risk of flooding (namely plots 1, 2a, 2b and 3).
- g) The existing risk from fluvial and tidal flooding is considered to be medium-low. The proposal provides safe access and egress routes, above predicted 1 in 100-year (+35% CC) flood levels, for areas of Marlow Film Studios categorised as being located in flood zone 2.

During the detailed design phase, a flood evacuation plan will be developed, and it is noted that the up to date topographic surveys show ground levels higher than the historic EA flood risk mapping levels which identify this land as falling within flood zone 2. Therefore, there is a low residual risk from fluvial and tidal sources.

- h) The flood risk from reservoirs has been assessed as very low.
- i) The Environmental Statement concludes that the flood risk and drainage receptors are identified to be negligible and insignificant (para. 13.142).

10.45 Therefore, in flood risk terms, the Marlow Film Studios is considered to accord with policy DM39 of the Local Plan and the Framework.

Drainage

10.46 Policy DM39 of the Local Plan requires all development to incorporate sustainable urban drainage systems ensuring that:

1. for Greenfield sites, run off rates at the Site boundaries do not exceed existing Greenfield run off rates; and,
2. within the Site: surface water run-off is managed as close to the source as possible; is given to sustainable drainage systems which mimic and reflect natural drainage processes; and details for future maintenance over the lifetime of the development are included.

10.47 In support of the application a Surface Water Drainage Strategy has been prepared by AECOM (Document 11). It sets out a description of the Site as existing, the planning policy position at the local and national level, outlines the proposed surface water drainage strategy and conclusions/recommendations. In summary the strategy advises:

1. Infiltration directly to ground is not considered to be a viable option for the Site.
2. The Site will have controlled discharge into the Westhorpe Watercourse and Westhorpe Lake.
3. Attenuation will be provided through a combination of swales, ponds, buried geocellular crates, blue roofs and bioretention features.
4. A high-level management and maintenance strategy has been provided.

10.48 Therefore, the sustainable urban drainage strategy is considered to accord with policy DM39 of the Local Plan and the Framework.

Access, Transport & Accessibility

The relevant Development Plan policies are:

- CP7 (Delivering the infrastructure to support growth)
- DM2 (Transport Requirements of Development Sites)
- DM19 (Infrastructure Delivery),
- DM33 (Managing Carbon Emissions: Transport and Energy Generation)

Policy

- 10.49 Policy CP7 of the Local Plan sets out the Council's strategic aims in respect of transport. Its aims include improvements to the A4 corridor South of High Wycombe, including at Marlow (i.e. A404/A4155 Junction).
- 10.50 Policy DM2 of the Delivery and Site Allocations Plan sets out a requirement for major development to provide a Transport Assessment setting out how proposals will minimise their impact on the existing highway network, surrounding areas and the environment. The Transport Assessment should set out how major development will contribute to public transport, walking/cycling, and a strategy for encouraging modal shift. It also needs to provide a mechanism for monitoring and managing the modal shift through the use of travel plans and other measures.
- 10.51 Policy DM33 of the Local Plan sets out the sustainable transport requirements of new development to manage carbon emissions. These requirements include: the sustainable location of development; multi modal access to the Site; provision of Electric Vehicle charging points; sufficient parking and mitigating as necessary the impact on network capacity.
- 10.52 The provisions of Development Plan policy broadly chime with the Framework. Notably the Framework states at para.111 that: "development *should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe*". In this case the impacts are not severe.

Transport and Accessibility Appraisal

- 10.53 In support of the application a Transport Assessment (Document 9) has been prepared by Waterman. The environmental effects of transport and access are also considered as part of the Environmental Statement (Chapter 8). A Travel Plan ('TP') and Sustainable Transport Strategy has been prepared by Waterman and appended to Chapter 8 of the Environmental Statement.
- 10.54 The Transport Assessment ('TA') considers the: policy context, the existing situation (i.e. baseline), the proposed development, the sustainable transport strategy, projects anticipated future traffic flows and the impact of the development on local junctions. The findings of the TA are summarised below:

Highway Capacity

- 10.55 The Transport Assessment (TA) includes a forecast of the additional trips from the Marlow Film Studios and assesses their potential impact on the

existing highway network. The TA recognises the operational capacity issues at peak times at the A404/A4155 Junction but concludes that with the robust Sustainable Transport Strategy in place that the impact on this junction would be manageable and it would continue to operate within operational capacity. The mean maximum queues would be well accommodated by the off-slip roads. The forecasts also indicate that both the proposed AECOM designed Option 1 and Option 2 layouts at the A4155 Marlow Road / Pump Lane South / Site Access junction would be able to accommodate the forecast 2027 traffic with the unmanaged Marlow Film Studios in all peak hours. The TA shows that Marlow Film Studios can reduce the level of vehicular traffic generated through implementation of a Sustainable Travel Strategy (STS) – the aim is a 60:40 split between motor vehicle mode share target and alternatives to the private car such as bus, walk and cycle. Marlow Film Studios integrates with other committed and planned development such that the cumulative residual impact on the road network would not be severe.

Vehicular Access

- 10.56 Historic accident data on the highway network surrounding the Site has been reviewed and raises no significant patterns or concerns with respect to the impact of Marlow Film Studios in terms of highway safety.
- 10.57 The conceptual Site access junction designs have been submitted for a Stage 1 Road Safety Audit and a Designer’s Response provided by the Design Organisation. As a result, it is considered there are no significant trends or features within the study area, that would increase the propensity for accidents to occur.
- 10.58 Therefore, the Site access would not negatively impact on highway safety.

Internal Road Design and Servicing

- 10.59 The internal road network has been designed to accommodate vehicles of a range of sizes to meet the functional needs of the film studio.

Sustainable Travel (walk, cycle, and public transport)

- 10.60 Marlow Film Studios will support opportunities for access to sustainable travel modes as part of the Sustainable Transport Strategy (STS) contained within the Framework Travel Plan (TP). This will support a modal shift away from the private motor vehicle toward public transport (bus and rail) and active travel (walking and cycling).
- 10.61 The STS seeks to deliver a maximum 60% motor vehicle mode share target. This is proposed to be achieved through the implementation of a ‘Monitor and Manage’ approach, which seeks to increase the use of public transport to circa 20% mode share, active travel to circa 15% mode share with the remaining 5% mode share being made up of mixture of motorcyclists, scooter users and car passengers etc. This is proposed to be delivered through a range of TP measures.

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- 10.62 Marlow Film Studios will deliver two new bus services, a north-south service between High Wycombe and Maidenhead (30 min intervals), and an east-west ‘Hopper’ service between Marlow and Bourne End. Both routes will serve the Site and provide onward connections with residential areas, and transport interchanges including rail stations and the High Wycombe Park & Ride (P&R).
- 10.63 In addition to cycle parking, the Marlow Film Studios will also include an on-site bike hire scheme.

Public Right of Way

- 10.64 The existing Public Right of Way that traverses east/west across the Site will be preserved on its current alignment and upgraded to facilitate its use for pedestrian and cycle movements. This will link to Buckinghamshire Council’s planned improvements to the Public Right of Way to the east and therefore represent a significant upgrading of the walk/cycle connection between Marlow and Bourne End.

Car & Cycle Parking

- 10.65 Marlow Film Studios will provide car parking for 1,108 vehicles. 20% (222) of these spaces will have electric vehicle (EV) charging points. The remainder of the spaces will have passive EV provision so that they can, in the future, be converted if required.
- 10.66 Marlow Film Studios will provide secure and covered cycle parking within the Site for 272 bicycles. These will be located within the Mobility Hub and conveniently located clusters throughout the Site. The cycle parking provision will meet BREEAM compliance standards.

Travel Plan (TP)

- 10.67 The Applicant will implement, monitor, and manage the STS through the TP to help staff maximise the spatial advantages of the Site in relation to sustainable transport modes and opportunities for access by non-car means of travel to the Site.
- 10.68 The Monitor and Manage strategy includes the provision of a ‘Mode Share Incentive Scheme’ (MSIS). This comprises a financial sum which is released if necessary to finance sustainable travel schemes to ensure mode share targets are met within an identified timeframe.

Conclusion on Transport and Accessibility

- 10.69 The TA, STS and TP demonstrates that Marlow Film Studios can be accommodated within the surrounding highway and transport networks such that the cumulative residual impact would not be severe.
- 10.70 Marlow Film Studios proposes a number of sustainable travel measures to support modal shift on the Site. In particular the provision of two new bus services, one between High Wycombe and Maidenhead and the other

between Marlow and Bourne End. These will provide significant public benefits. These benefits weigh in favour of the grant of planning permission.

10.71 In accordance with Paragraph 111 of the Framework, it is considered that there are no material transport or highway reasons why the highway authority should withhold or refuse planning permission.

10.72 Accordingly, there is no transport associated reason why Marlow Film Studios should not be approved by Buckinghamshire Council.

Open Space

The relevant Development Plan policies are:

- CP7 (Delivering the Infrastructure to Support Growth), and
- DM16 (Open Spaces in New Development)
- DM 29 (community facilities)

10.73 Policy CP7 of the Local Plan sets out the Council's strategic aims in respect of the provision of social infrastructure. This includes the provision of new community facilities and facilities that promote healthy living including open space and recreation.

10.74 Policy DM16 of the DSADPD sets out the Council's open space requirements for residential and commercial development. For Sites in excess of 5000sqm strategic open space is provided off-site and funded through CIL. Local open space should be provided on-site in accordance with the standards set out in Table 3⁵⁶. Table 3 requires 1.15 hectares of local open space per 1000 of population. It is not clear from the policy how population is derived for employment Sites. Assuming one head of population is equal to one FTE, Marlow Film Studios is required to provide c.2.4ha⁵⁷. The policy does not differentiate between employment and residential schemes in terms of the nature of open space to be provided. In the case of Marlow Film Studios, given the anticipated number of employees on the Site (c.2097), it is considered to be reasonable to include areas within the security cordon, as well as permissive and permanently public spaces, as all will at times be used by the public and even when being used exclusively by employees, will still attract significant levels of footfall and therefore deliver public benefit in accordance with the spirit of policy DM16.

10.75 Marlow Film Studios will not result in the loss of any public or private open space as the Country Park allocation on the Site and across much of the allocation is undeliverable and all existing public and permissive footpaths will be retained.

10.76 Marlow Film Studios will deliver 4.9 hectares of both public and permissive open space. This includes:

- a) A publicly accessible cycling connection alongside Plot 3 – 0.2ha;

⁵⁶ See p.77 of the DSA DPD

⁵⁷ Assuming 1780-2415 FTE staff (average 2097) [p. 54 of Economic Case]. 2.097 x 1.15ha = 2.4ha local open space.

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- b) Studio Hub open space. This will be open to the public for certain events – 0.2ha;
 - c) Enhanced Public Right of Way alongside Plots 1 and 3 – 0.6ha;
 - d) An area of amenity space adjacent to the community facility on Plot 2a – 0.1ha;
 - e) Permissive path on edge of Plot 4 – 1.0ha; and
 - f) Permissive accessible area on Plot 4 – 2.8ha.

10.77 In addition, a contribution will be made for off-site works to facilitate delivery of additional recreational space (footpaths etc.), which will further add to the open space benefit.

10.78 Marlow Film Studios will deliver more than double the normal policy requirement for public/private open space. This weighs in favour of the grant of planning permission.

Community Facilities

The relevant Development Plan policies are:

- o CP7 (Delivering the Infrastructure to Support Growth)

Planning Policy

10.79 Policy CP7 recognises the need for the provision of new community facilities, improving land in community use and provision of facilities that promote healthy living including open space and recreation. The Framework (paras. 84d and 93a) are supportive of the protection and creation of new shared community spaces and cultural buildings. Para. 84d *recognises that sites to meet local community needs in rural areas may have to be found adjacent to or beyond existing settlements*. Generally there is planning support in principle for the provision of community facilities and a clear recognition in the Framework that in rural areas provision may need to be made beyond existing settlements.

10.80 The Community Facilities Strategy Update (March 2014), prepared by the former Wycombe District Council, sets out the most up-to-date local appraisal of community needs in the area. The strategy is based on the old Ward areas, but still gives a good indication of community facilities in the area and identifies where deficiencies exist. The Site is located within the Ward of Flackwell Heath and Little Marlow. It is identified as having a geographic deficiency based on catchment area and the size. The Ward Profile indicates that the deficiency can be met by *'development of a new facility should there be local demand'*. The nearest adjoining Wards of Greater Marlow, Marlow North & West, and Marlow Southeast also all indicate some level of deficiency. In particular, Marlow North and West, which is deficient in all areas (i.e. by number, size and geographically).

Community Facility Appraisal

10.81 Marlow Film Studios incorporates two community and cultural facilities, the:

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- 947 sqm (GEA) (10,193 sqft) of new Culture and Skills Academy, to be used for cultural, educational, and recreational uses in Plot 4; and ,
 - 147 sqm (GEA) (1,582 sqft) new community building in Plot 2A for uses falling within F1 and F2 of the 1987 Use Classes Order (as amended).

10.82 The 947sqm building on Plot 4 would be used for cultural, educational, and recreational uses in connection with the film studio and be available for public use at other times. The 147 sqm building on Plot 2A would be a dedicated community building, principally for immediate neighbours, but could also serve the wider community. The provision of these two community facilities along with the publicly accessible land on Plot 4 would serve to meet a currently clearly identified community need in the local area, it would also serve to address the recognised deficiencies in adjacent Wards.

10.83 The provision of these two community facilities is considered to represent a significant planning benefit, that weighs in favour of the grant of planning permission.

Historic Environment

The relevant Development Plan policies are:

- o CP11 (Historic Environment), and
- o DM31 (Development affecting the Historic Environment)

10.84 Policy CP11 requires proposals to conserve, and where possible enhance, the significant special interest, character and appearance of designated and non-designated heritage assets and historic landscapes. Policy DM31 requires developments that affect the significance of heritage assets to prepare a heritage impact assessment. Policy DM31 at paras. 4 and 5 introduces a policy test relating to the significance of harm, which broadly echoes the test in paragraphs 201 and 202 of the Framework. Where development leads to substantial harm the presumption is that consent will be refused unless it can be demonstrated that it is necessary to achieve substantial public benefits that cannot be achieved otherwise, which outweigh that harm. Alternatively, where development is considered to lead to less than substantial harm to the significance of a heritage asset, consent would be refused unless the harm is outweighed by the public benefits.

10.85 The Historic Environment is addressed in Chapter 15 of the Environmental Statement prepared by Waterman (Competent Experts) and a Statement of Heritage Significance (Document 27) prepared by Historic Landscape Management Ltd., which forms part of the Planning Application.

10.86 Chapter 15 of the Environmental Statement advises that the historic environment baseline within the Site is comprised of six non-designated heritage assets and two Historic Landscape Characterisation areas of historic interest. Within the Study Area the historic environment baseline is comprised of both designated heritage assets (23 Listed Buildings and three Conservation Area) and non-designated heritage assets (44 Monuments, archaeological findspots and a landscape record).

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- 10.87 The Statement of Heritage Significance identifies that the Marlow Film Studios will not result in observable harm to the fabric or either Westhorpe House or Corners Cottage. The impact on Little Marlow Conservation Area is considered to be negligible adverse, which would be less than substantial – minor. The former park, given the changes that have already taken place, is considered to have a ‘slight’ significance of effect and less than substantial – minor harm. The site of the WWII prisoner of war camp, which is of low significance, is considered to be of less than substantial – minor harm (this impact would be mitigated by the preparation of an archaeological scheme of investigation). The former park as a setting, given the changes that have already taken place, is considered to experience a ‘slight’ significance of effect, which is considered to give rise to less than substantial – minor harm.
- 10.88 The Environmental Statement recommends that a programme of archaeological evaluation is completed to confirm the presence, absence, date, value, extent, and condition of any surviving archaeological remains within identified areas of remaining archaeological potential within the Site. This will then inform any mitigation works that may be required.
- 10.89 In view of the findings of the Environmental Statement and Statement of Heritage Significance, Marlow Film Studios is considered to lead to less than substantial harm to the significance of designated and non-designated heritage assets. For reasons that will be expanded upon in the Planning Balance, the less than substantial harm, is clearly outweighed by the public benefits.

Local Amenity

The relevant Development Plan policies are:

- CP9 (Sense of Place)
 - DM35 (Placemaking and Design Quality)
- 10.90 Policy DM35 requires development to prevent significant adverse impacts on the amenities of neighbouring land and property. Notably the test in the Local Plan is not that neighbouring land/property is not affected, but rather the impacts are not significant and adverse. The degree of harm to amenity will be dependent on a number of factors including the magnitude of the harm and the duration of that harm.
- 10.91 There are a number of properties that will be affected by Marlow Film Studios, but none that are considered to suffer significant adverse impacts. There will be times during the implementation of Marlow Film Studios when the impacts will be more acutely felt, such as during the construction phase, but these impacts will be capable of being managed, to a reasonable degree, and will be relatively short lived; a degree of disruption at the construction stage is to be expected with any development. When the impact of the development is taken as a whole, over the life of the scheme, it is not considered to have a significant adverse impact on amenity. A Construction and Environmental Management Plan (CEMP), which is capable of being secured by condition, would be able to mitigate the most significant adverse impacts at the construction stage. Backlot and wider Site management plans (inc. lighting plans) would be capable of mitigating impacts once the studio is operational. It is proposed that a near

neighbour's liaison group will be set up (Megaphone) to manage the relationship between the Film Studio and its near neighbours; it will allow any issues that do arise to be robustly addressed in a timely manner.

- 10.92 The closest residents to the development are located within the Westhorpe Park Homes. The nearest Park Home (no.6) will be located c.27 metres from the nearest building on the Site (Building 209 – a workshop). The Site has been designed and laid out to ensure that those buildings in closest proximity to residential dwellings are some of the smaller scale buildings within the development. Given the distance of the Park Homes from the nearest building and the presence of an existing high level intervening wall, there is not considered to be any unreasonable impact on amenity in terms of overbearing, overshadowing or loss of light.
- 10.93 As a precaution, and following consultation feedback, a Daylight and Sunlight Report (Document 22) was prepared by Waldrams to accompany the application. The Daylight and Sunlight Report analysis has been carried out in accordance with the methodology contained in the Building Research Establishment's Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice (2011). The analysis shows that all surrounding residential properties will meet the target values set out within the BRE guidelines when considering daylight and sunlight. Therefore, the impacts fall within reasonable limits.
- 10.94 In conclusion, whilst Marlow Film Studios does lead to a material change for a number of residents and will have some impact on their amenity and sense of amenity, the impact falls well below being significant adverse. The impact of Marlow Film Studios on residents has been minimised through good design. The residual harm is capable of being controlled and mitigated through good management, which itself is capable of being controlled via condition. Taken in the round, the harm to existing residents' amenity is considered to be minimal; the issue is more a feeling of harm as a consequence of change. A degree of impact is unavoidable in the creation of sustainable communities where development must be located in relatively close proximity to existing development.

Environmental Issues

The relevant Development Plan policies are:

- CP12 (Climate Change)
- DM20 (Matters to be Determined in Accordance with the National Planning Policy Framework)
- National Planning Policy Framework (Framework) – Chapter 15,
- Air Quality SPD

Ground Conditions

- 10.95 Para. 183 of the Framework requires decisions to ensure that a Site is suitable for the proposed use taking account of ground conditions and contamination.
- 10.96 A Contaminated Land Interpretative Report (March 2022; Ref: WIE18037-106-R-10-3-1-GQRA) and Remediation Strategy (March 2022; Ref: WIE18037-100-S-2-2-1-RMS) accompanies the submission and is appended to the

Environmental Statement. The issue of Ground Conditions, Contamination and Waste is also addressed in Chapter 12 of the Environmental Statement.

- 10.97 Overall, the risk rating for the Site is assessed as Medium, whereby without implementation of the recommended mitigation measures pollutant linkages are present. Recommendations include, but are not limited to, the following:
- Ground gas protection should be incorporated for built structures.
 - During groundworks, where required, dust, noise and odour mitigation measures should be employed to reduce the Site's influence on the surrounding environment. The required mitigation measures should be detailed in a Construction Environmental Management Plan (CEMP).
 - An Asbestos Management Plan in accordance with the Control of Asbestos Regulations 2012 should be prepared and adhered to during the construction works.
- 10.98 The report concludes that where the recommendations are implemented, the pollutant linkages will be broken, and the Site's overall risk rating will be reduced to Low.
- 10.99 The Remediation Strategy proposes two mitigation types: Ground Gas Protection Measures and Piled Foundations. It also proposes a verification report to be prepared and submitted at each stage of the construction of the development.
- 10.100 Therefore, it can be concluded ground conditions and contamination have been taken into account and the provisions of the Framework have been complied with.

Air Quality

- 10.101 Para. 186 of the Framework requires decision makers to take air quality into account. The Framework advises that opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision/enhancement. Planning decisions should ensure that any development in Air Quality Management Areas and Clean Air Zones, is consistent with the local air quality action plan.
- 10.102 The Council's Air Quality SPD sets out the Council's expectations in respect of air quality mitigation for Major developments.
- 10.103 Air Quality is addressed at Chapter 9 of the Environmental Statement. An Air Quality Monitoring Report, prepared by Waterman, is attached at Appendix 9.1 of the Environmental Statement (Jan 2022; Ref: WIE18037-100-AQMR-1-1-4). The Site is not within an Air Quality Management Area; however, AQMA No.3 (Marlow) is approximately 900m west of the Site.
- 10.104 Chapter 9 of the Environmental Statement can be summarised as follows:
- a) The main likely effects on local air quality during demolition and construction relate to nuisance dust and exhaust emissions from construction vehicles and plant.

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- b) A range of measures to minimise or prevent dust and reduce exhaust emissions generated from construction activities would be set out in the Construction and Environmental Management Plan (CEMP) and implemented throughout the demolition and construction phase. Therefore, it is considered effects due to dust emissions would be negligible.
 - c) Construction traffic movements would be agreed with BC and consideration given to the avoidance, or limited use of roads during peak hours. Considering these measures, the effect of construction vehicles on local air quality would be negligible.
 - d) A detailed modelling exercise has been undertaken to assess likely effects on local air quality associated with changes to road traffic from the Development. The modelling indicates levels of nitrogen dioxide and particulates would not exceed nationally accepted limits at any of the nearby residential properties or within the Development in 2027. It is concluded that the effect of the Development on levels of nitrogen dioxide and particulates would be negligible.
 - e) Notwithstanding this, the Sustainable Transport Strategy (STS) included at Appendix 8.3 in the Environmental Statement, sets out an ambitious range of transport measures to limit air pollution during use, namely:
 - i. 20% parking spaces having EV charging points with passive provision on the remainder;
 - ii. building services will be fossil fuel free; and,
 - iii. a number of measures are proposed to maximise use of walking, cycling and public transport.

10.105 Therefore, it can be concluded that air quality has been taken into account, potential harms identified, and mitigation put forward to manage those harms. As such, the provisions of the Framework have been complied with.

Lighting

10.106 Policy DM20 of the Local Plan defers the issue of light pollution to the guidance in the Framework. The Framework at para. 185 advises that planning decisions should seek to limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes, and nature conservation.

10.107 The lighting strategy on the Site is addressed in the External Lighting Concept/Strategy prepared by AECOM (Document 12). The impacts of the lighting strategy are assessed in the Solar Light Pollution Report (Document 24) prepared by Waldrams (11 April 2022; Ref: 2863).

10.108 The External Lighting Concept/Strategy sets out the: road and landscape lighting strategy; building lighting strategy; temporary lighting strategy; and lighting control strategy. Exterior lighting follows best practise environmental

and technical guides to minimise impacts on its setting and ecology. The lighting has been designed so that:

- it is not overly uniform;
- lighting levels are kept appropriately low, but safe;
- small scale discrete lighting is used on roads and paths;
- illumination of roads, footpaths and building is independently controllable to avoid any unnecessary light impact;
- lighting has been designed to promote walking and cycling; and,
- lighting has been designed with landscape impact in mind.

10.109 The Light Pollution Report assesses the impact of Marlow Film Studios (and associated lighting strategy) on the surrounding residential and ecological receptors. The existing Site has been assessed as falling within an area classified as being rural (E2) to suburban (E3). Within E2/E3 areas, the guidance provided by the Institute for Lighting Practitioners (ILP) recommends a maximum illuminance for adjoining sensitive receptors of 1-2 lux post curfew (11pm).

10.110 The lights spill assessment for Marlow Film Studios has been undertaken in three scenarios:

1. Scenario 1 “Permanent Lighting” represents the day-to-day lighting of the Site at night when no night shoot filming is taking place.
2. Scenario 2 “Temporary Lighting General Production Setup and Set Strike” adds to Scenario 1 the lighting required for General Production Setup and Set Strike as well as lighting required for Access and Egress for the areas designated for this purpose.
3. Scenario 3 “Temporary Lighting Filming” adds to Scenario 2 the lighting required for Filming.

10.111 The results show that Marlow Film Studios will have a limited impact on surrounding receptors in Scenario 1 with the majority of light spill being in the 0-2 lux range, with the exception of the bridge location, which is up to 5 lux. Scenarios 2 and 3 show a small increase in light spill in respect of ‘Stallworthy’ and ‘Crown Plaza Hotel’ and on the woodland edge, waterbodies, and bridge location; however, all continue to fall within 0-5 lux range with only the bridge location and Crown Plaza towards the upper end of the range.

10.112 The impact on ‘Stallworthy’ would be within the 1-2 lux range, which is identified as being acceptable in a E2 Rural to E3 Suburban Zone. The impact on Crown Plaza would exceed the normal rural/suburban range, but this must be seen in the context of the existing light levels at Crown Plaza and the transient nature of the use, which renders it lower sensitivity. The woodland edge, water bodies and bridge location would be impacted to varying degrees in all scenarios, but this is principally due to their close proximity to the light sources. Notably all impacts do not take account of existing and proposed mitigation. It is also worth noting that the

assessments have been undertaken to illustrate a worst-case scenario and when the backlot on Plot 5 is not in use the impact on sensitive receptors will be much reduced.

- 10.113 The lighting impact is proposed to be mitigated through the retention and enhancement of existing vegetation on the Site and the preparation of a backlot management plan, which could include lighting mitigation, such as screening as part of set designs
- 10.114 Therefore, it can be concluded that the impact of lighting has been taken into account, the harms arising to sensitive receptors are limited and capable, to a large extent, of being mitigated. As such, the provisions of the Framework have been complied with.

Noise/ Vibration

- 10.115 Policy DM20 of the Local Plan requires issues relating to noise and vibration to be assessed under the guidance in the Framework. The Framework at para. 185 advises that planning decisions should seek to mitigate and reduce to a minimum the potential adverse impacts resulting from noise from new development and avoid significant adverse impacts on health and quality of life.
- 10.116 Noise and Vibration is assessed at Chapter 11 of the Environmental Statement.
- 10.117 The Environmental Statement sets out that noise impact has been a key consideration in the design of the scheme. Notably the backlot is located in Plot 5 away from sensitive residential receptors and earth bunds are proposed around the backlot.
- 10.118 The Environmental Statement identified:
- Temporary short-term noise and vibration effects (local up to major adverse) during the demolition and construction phase. These are capable of being monitored and controlled through the preparation of a Construction and Environment Management Plan (CEMP).
 - The potential for ‘moderate adverse’ studio and backlot noise to nearby sensitive receptors during the operational phase. This impact is capable of being mitigated through the preparation of a noise management strategy which would control times of high noise filming and facilitate communication with local residents.
 - The potential for noise from fixed plant, building services and traffic noise was considered to be negligible.
- 10.119 Therefore, it can be concluded that the impact of noise and vibration has been taken into account, the harms arising to sensitive receptors are limited in time and severity and are capable, to a large extent, of being mitigated. The mitigation should ensure significant adverse impact on health and quality of life are avoided. As such, the provisions of the Framework have been fully complied with.

Solar Glare

10.120 To support the application a Solar Glare Report (Document 24) has been prepared by Waldrams. The Solar Glare Report considers reflections of sunlight from Marlow Film Studios which has the potential to be viewed by road users on the adjacent road network. The assessment has been undertaken with reference to guidance provided by the British Research Establishment (BRE). The location of sensitive receptors for reflected solar glare has been determined as those intersections where road users' visibility is of greatest importance when considering the safety of all road users. The report concludes that whilst incidents of reflected solar glare will occur (this is not unusual) that the impacts have been mitigated. As a consequence the evidence demonstrates that the scheme is unlikely to cause disabling glare or any significant distracting glare.

Utilities

The relevant Development Plan policies are:

- DM19 (Infrastructure Delivery), and
- DM38 (Waste and Quality Supply)

10.121 Policies DM19 and DM38 require developments to demonstrate how they will be served by adequate infrastructure capacity, without leading to significant problems for existing users or contamination.

10.122 In support of the application AECOM have prepared a Utilities Statement and Foul Drainage Assessment (Document 14). The statement considers the impact of the development on the following utilities: electricity, potable water, telecommunications, gas, and foul sewage. The results of the assessment can be summarised as follows:

- Electricity - SSEN are developing updated Connection Offers for the supply of electricity to the Site. A Connection Offer is expected to be received post submission of the Planning Application.
- Potable Water - The Applicant has committed to underwriting Thames Water modelling works to identify the existing capacity within their potable water network and any reinforcement works which may be necessary to supply Marlow Film Studios.
- Sewage - Thames Water has undertaken an assessment of their existing sewerage infrastructure in the vicinity of the Site and has confirmed that this has sufficient capacity to accept foul effluent from Marlow Film Studios without the need for reinforcement works.
- Telecommunications - Openreach have offered to provide a resilient ethernet service to Marlow Film Studios, using their existing infrastructure within the A4155 Marlow Road for the primary service and a separate network from their Bourne End Telephone Exchange for the secondary service. They have also offered to provide Fibre to the Premises (FTTP) to each of the buildings within Marlow Film Studios.

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- Internet - Virgin Media have offered to extend their existing network located beneath the A4155 Marlow Road into the Site to allow the Applicant or future tenants to rent a service from them.
 - Gas - The Applicant is aiming to deliver a sustainable, low carbon scheme and as such has no plans to utilise gas within Marlow Film Studios. Therefore, no new gas infrastructure will be brought to the Site as part of the proposed Development.

10.123 Marlow Film Studios will have little impact on the existing utility infrastructure located within or adjacent to the Site. Any diversions or protection of existing utilities as a result of the Proposal will be undertaken by the Applicant following consultation with the relevant Statutory Undertaker. Therefore, Marlow Film Studios will not give rise to any planning harms in respect of the provision of necessary utilities.

Agricultural Land

The relevant Guidance

- Para. 174 of Framework

10.124 Para. 174 of the Framework requires decision makers to have regard to the wider benefits from natural capital and ecosystem services, including the economic and other benefits of the best and most versatile agricultural land.

10.125 Simmons and Sons have prepared an Agricultural Land Assessment to support the application (Document 21). The report concludes that given the current state and condition of the land and its previous use as a landfill site, that the land is entirely unsuitable for any agricultural use.

10.126 With particular regard to arable or horticultural production the report concludes that:

- a) the thin and variable nature of the soil cover would not provide a suitable seed bed;
- b) The ground conditions would also be too variable for consistent production;
- c) normal agricultural machinery operations would not be possible due to the likelihood of striking foreign material in the soil; and,
- d) the possibility of contamination to the produce making it unfit for human consumption cannot be ruled out.

10.127 With particular regard to the potential for using the land for grazing for livestock or other animal production the report concludes that the nature of the land presents a serious risk to animal health by way of either direct injury from, or ingestion of, foreign material in the soil. Also, they cannot rule out contamination to the produce making it unfit for human consumption.

10.128 With regard to forestry the report concludes that the Site would be unsuitable for forestry or carbon capture through tree planting due to the shallow nature of the soil.

10.129 Given that the land is unsuitable for agriculture and forestry, no agricultural or forestry harm arises as a consequence of the reuse of the land.

Minerals

The relevant Development Plan policies are:

- Policy 1 (safeguarding Mineral Resources)
- Policy 26 (Safeguarding of Minerals Development and Waste Management Infrastructure)

10.130 Policy 1 of the Buckinghamshire Minerals and Waste Local Plan (adopted July 2019) sets out that, in order to be permitted, proposals for development within Mineral Safeguarding Areas (MSA) must demonstrate, through the preparation of a Minerals Assessment, that prior extraction of the mineral resource is practicable, environmentally feasible and does not harm the viability of the proposed development and/or there is an overriding need for the development.

10.131 A Minerals Assessment has been prepared by Waterman (Document 15) to accompany the application. The assessment considers the opportunity on the Site and the extraction issues. It concludes that given the size and location of the potential mineral deposits that their extraction would pose environmental risks to controlled waters and air quality and lead to a net loss of -£10m. Therefore, mineral extraction on the Site is considered neither a practical nor commercially viable proposition. In addition, the need for development, and early delivery, as set out earlier in this report and in detail in the Economic Case prepared by Volterra, outweighs the benefits of extracting the quantum of gravel that is anticipated as remaining in the ground.

10.132 On the basis that the minerals on the Site (namely gravel) could not be viably extracted either with or without the development, in the balance of decision making, this is considered to represent a neutral point that neither weighs for or against Marlow Film Studios.

11.0 Assessment Against the Framework

Sustainable Development

- 11.1 This section of the Planning Statement provides an outline of how Marlow Film Studios constitutes sustainable development as defined by the Framework and the weight that should be attached to it.
- 11.2 The Framework identifies at paragraph 7 the purpose of planning and of the Framework as one of achieving sustainable development. Sustainable development is aligned with growth, and it indicates that such development should go ahead without delay.
- 11.3 Taken as a whole, the Framework constitutes the Government’s view of what sustainable development means in practice for the planning system. The Framework re-states the statutory test in section 38(6) of the Act.
- 11.4 The sustainability credentials of Marlow Film Studios are a material consideration. It is relevant, significant and of considerable weight given the priority attached to it.
- 11.5 These three objectives are elaborated in paragraph 8, which notes:
- **economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure
 - **social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and
 - **environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 11.6 These objectives should not be taken in isolation and decisions need to take local circumstances into account, so they respond to different opportunities for sustainable development in different areas. There is not a fixed UK standard and therefore each proposed development has to be individually assessed in its own context. A summary is set out below against each objective.

<p>Economic Objective</p>	<p>The Economic Case for development is addressed in Section 9 of this report and provides the main thrust for the very special circumstances case. The issue is considered to greater detail in the Economic Case and Chapter 7 of the Environmental Statement.</p> <p>The Marlow Film Studios makes the following key contributions to the economic objective:</p> <ul style="list-style-type: none"> a) The Marlow Film Studios will address a significant need for film and television space, which if not addressed will see the loss of potential economic productivity in the UK (see Very Special Circumstances 2 & 3 for further details). b) The Site is located within the West London Cluster, which is the sequentially most preferable location for a large new studio preparing productions at scale (See Very Special Circumstance 4 for further details). c) 9130 implied jobs over the construction period of around 44 months. d) £7m spend by construction workers e) 1780-2415 direct FTE jobs. f) 3685 FTE indirect jobs (4,180 when accounting for part-time working patterns). g) Deliver 17% of Buckinghamshire’s planned future economic growth. h) Direct and indirect employment leading to £338m GVA per annum. i) Tax revenue of between £78-£105m per year. j) £120m increase in the value of UK exports. k) Marlow Film Studios will support between £130-£155 production expenditure. l) Marlow Film Studios will contribute towards the UK tourist industry. m) Marlow Film Studios will deliver an Employment and Skill programme (inc. support 30 trainee positions, 7 bursaries) leading to £1.1m in direct social value. n) Vocational training generating £45,900 in social value.
<p>Social Objective</p>	<ul style="list-style-type: none"> a) Marlow Film Studios will: b) Deliver a skills programme (as set out under the economic objective), which will provide social as well as economic benefits, by not only training the young, but also providing re-skilling and lifelong learning (Further details are available in Section 9 of this Statement and Very Special Circumstances 1). c) Deliver private and public (permissive) open space (land for quiet recreation), most notably on Plot 4. d) Deliver a new cultural, educational, and recreational building in Plot 4, which will be multi-use as a Skills and Education facility and also a flexible community, environmental and recreational space. e) Deliver a dedicated community facility on plot 2a.

	<ul style="list-style-type: none"> f) Part deliver, part fund, walk and cycle improvements both on and off-site. Most notably improvements to the existing Public Right of Way and the creation of a new cycle route adjacent to the A404 on the Site. Funding for improvements to walk and cycle routes within the policy RUR4 area. g) Invest to deliver two new public bus routes, both alighting at the Site: one a hopper service, from Bourne End to Little Marlow and Marlow, and the other from High Wycombe to Maidenhead. This will enable more frequent access to the Elizabeth Line connection through central London when operational.
<p>Environmental Objective</p>	<ul style="list-style-type: none"> a) Outstanding design and landscaping response, which takes the opportunities available and raises the standard of design more generally. b) 32% canopy cover achieved across the Site. c) Carbon Emissions set to deliver 105% savings in regulated CO₂ emissions. d) Comprehensive Sustainable Transport Strategy, which aims to deliver 60:40 modal split with aggressive promotion of alternatives to the private car (i.e., bus, cycle, and walking). e) Water saving measures. f) Green roofs on all sound stages. g) PV arrays on the roofs of all sound stages and car parks. Use of air source heat pumps. h) A fully integrated sustainable urban drainage strategy, which incorporates green/blue roofs, Swales/ponds/bioretenion systems and rain gardens. i) To achieve the emerging national requirement of 10%, and our own voluntary target of +20% net gain. Plot 5, save for the Backlot area, will be managed exclusively for nature. j) Designs have been developed to target a BREEAM very good or excellent for key buildings on the Site. The rating is measured against: Management, health and wellbeing, energy, transport, water, materials, waste, land use and ecology, pollution, and innovation. k) Preservation of existing and creation of new green infrastructure links.

Table 4 Sustainability Objectives Summary

Conclusion

11.7 Taking the three objectives together Marlow Studios clearly represents sustainable development.

12.0 Green Belt – Very Special Circumstances

12.1 The Framework 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.”

12.2 There is no policy definition of what comprises very special circumstances.

12.3 It is accepted that Marlow Film Studios, when taken as a whole, constitutes inappropriate development for the purposes of paragraphs 147 and 148 of the Framework and is therefore ‘by definition’ harmful in policy terms.

12.4 The High Court has ruled [Sefton Metropolitan Borough Council v SoS for HCLG [2021] EWHC 1082 (Admin) (07 May 2021)] that the Framework policy on considering Green Belt ‘special circumstances’ is ‘not a mathematical exercise’.

“They require the decision maker to have real regard to the importance of the Green Belt and the seriousness of any harm to it. They do not, however, require a particular mathematical exercise nor do they require substantial weight to be allocated to each element of harm as a mathematical exercise with each tranche of substantial weight then to be added to a balance. The exercise of planning judgement is not to be an artificially sequenced two-stage process but a single exercise of judgement to assess whether there are very special circumstances which justify the grant of permission notwithstanding the particular importance of the Green Belt.”

12.5 At its core very special circumstances depends on the overall planning balance.

12.6 The question is not whether any one benefit is a very special circumstance, but rather whether all the benefits, taken together, clearly outweigh the harm.

12.7 The chapter considers:

- 1) The degree of harm caused to the openness of the Green Belt, its purposes, and opportunities, as a result of the proposed scheme.

- 2) The impact of Marlow Film Studios (and potential for enhancement) of the defined uses of the Green Belt.
- 3) Whether very special circumstances exist to justify a grant of planning permission, which outweighs harm to the Green Belt by reason of inappropriateness, and any other harm resulting from Marlow Film Studios.

Green Belt Context

12.8 The administrative planning area (former Wycombe District Council) covers an area of some 324.57 sq. km (32,457 ha). 48% of the area is designated as Green Belt and 71% is designated as Chilterns AONB. There are several settlements interspersed between the main towns of High Wycombe, Princes Risborough, Marlow, and Bourne End. The area is therefore very constrained in planning terms, with little land that lends itself to development.

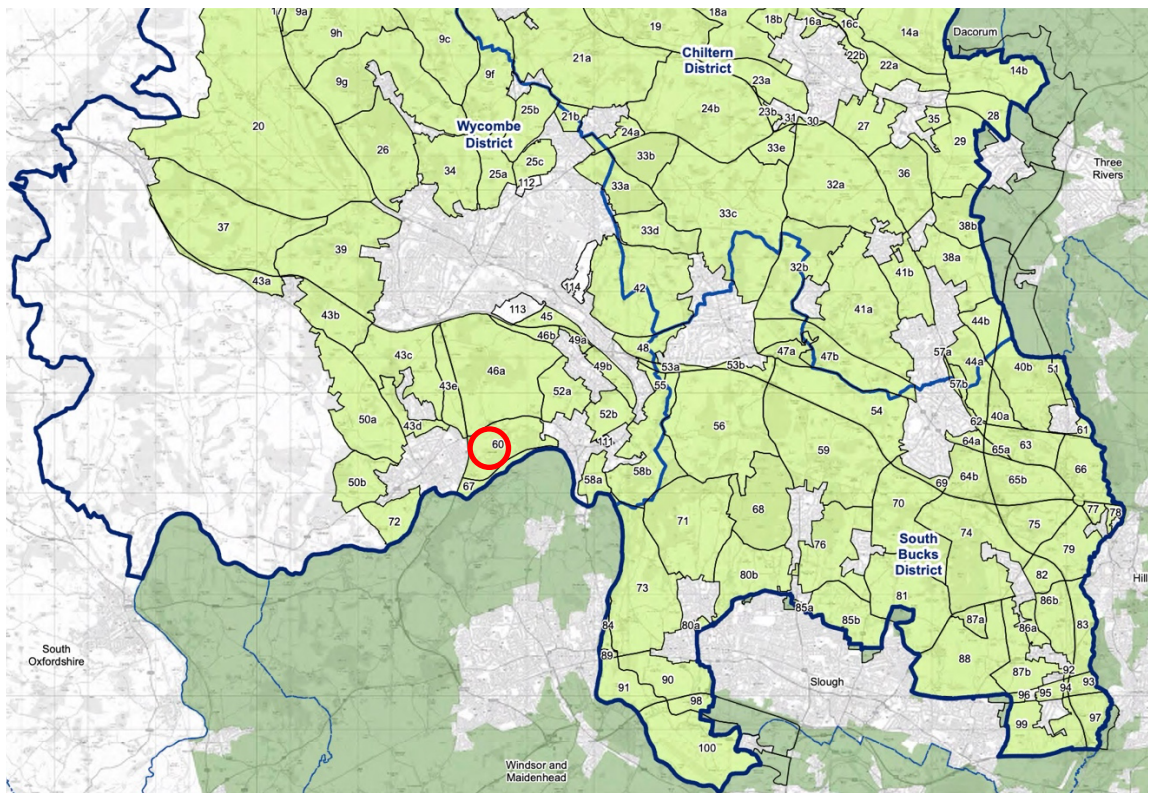


Fig. 4 shows the extent of the Green Belt in south Buckinghamshire. The application Site is located in parcel 60.

Assessment of harm to the Green Belt

12.9 Para. 137 of the Framework sets out that:

“The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness [absence of built development] and their permanence”

12.10 Openness has both a spatial and visual dimension.

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- 12.11 In addition to harm to openness, harm can also be caused by reason of inappropriateness, and any other harm (i.e. visual impact and the impact on Green Belt purposes). These harms will be assessed in more detail below.

Effect on the purposes of including land within the Green Belt

- 12.12 The Framework identifies five purposes that Green Belt serves (paragraph 138):

- a) to check the unrestricted sprawl of large built-up areas.
- b) to prevent neighbouring towns merging into one another.
- c) to assist in safeguarding the countryside from encroachment.
- d) to preserve the setting and special character of historic towns.
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

- 12.13 The Buckinghamshire Green Belt Part One and Part Two Assessments (March 2016 and Sept 2017) have been used to inform the site-specific assessment against the Green Belt purposes. It has been noted that the Part Two assessment only relates to the northern parcels and does not include Plots 4 or 5. The site-specific assessment is set out below:

Purpose a) – To check the unrestricted sprawl of large built-up areas

- 12.14 The Buckinghamshire Green Belt Part One Assessment (2016) defines Marlow as comprising a ‘large built-up area’. This is accepted.
- 12.15 The scale of the Site’s expansion into Green Belt land is circa 36ha. This compares to a substantially larger swathe of Green Belt extending across the former Wycombe District of 32,457 ha, with still more Green Belt in the adjoining Districts and Boroughs. This amounts to approximately 0.1% of the Green Belt in the former Wycombe District, still less if Buckinghamshire or the wider southeast is taken as a whole.
- 12.16 Marlow Film Studios has been designed to an optimum critical mass. Therefore, further expansion will not be necessary or desirable.
- 12.17 Marlow Road (A4155) to the north and Westhorpe Farm Lane to the east of the Site would serve to provide permanent defensible boundaries checking the potential for further sprawl to the north and east, whilst the presence of the flood zones (and railway line and River Thames beyond) would prevent or limit growth to the south.
- 12.18 Consequently, the Site is only considered to have a moderate conflict with this Green Belt purpose. This is also consistent with the Green Belt Part Two – Individual Site Assessment (Sept 2017), which gave the Site a score of 3 out of 5⁵⁸.
- 12.19 When undertaking an assessment against this purpose it should be acknowledged that the most sustainable locations for development will

⁵⁸ Green Belt Part Two Assessment – Individual Site Assessment (2017) – p.3

invariably be adjacent to large built-up areas. Therefore, in the interests of promoting sustainability, there is a certain inevitable conflict with this Green Belt purpose. This is evidenced by the fact all Green Belt releases, made by the council as part of the Local Plan process, involved the expansion of large built-up areas.

Purpose b) – To prevent neighbouring towns from merging into one another

12.20 The Buckinghamshire Part One Green Belt Assessment (2016) defines Marlow and Bourne End as towns. This is accepted.

12.21 The impact of the Site on preventing neighbouring towns from merging into one another is mitigated by the following factors:

- a) The Site, while being adjacent to Marlow, will maintain a gap of 1.8km to the next nearest town of Bourne End. Therefore, the two settlements will not merge in any physical or spatial way as a consequence of the Proposal. The impact would be more one of limited visual encroachment in an area already impacted by development.
- b) The area between Marlow and Bourne End already contains sporadic low density development including Little Marlow and the sewage works, which serves to limit the potential merging effect of the development.
- c) The main developed part of the Site is relatively contained and isolated from the remainder of the gap between settlements by Westhorpe House, the Park Homes and the existing development on Westhorpe Farm Lane to the south, the A4155 to the north and structural vegetation/tree line to the east of Westhorpe Farm Lane. Notably, the Council's Part Two Green Belt Assessment, which reviews the northern part of the Site notes the cumulative importance that the Site makes to maintaining separation, rather than its individual importance⁵⁹.
- d) The southern part of the Site would remain largely open with swathes of land down to the River Thames being retained as Green Belt.

12.22 These factors taken together, in particular the fact that the Site does not bridge the gap between two towns, means that the Site would only have a moderate impact (Score of 3) on the purposes of preventing neighbouring towns from merging. This is consistent with the Part Two Green Belt Assessment (Sept 2017), which gave the Site a score of 3 when assessing its impact on preventing neighbouring towns from merging⁶⁰. Due to the Sites proximity to the A404 and contained nature, it is considered to represent one of the least sensitive parts the gap between Marlow and Bourne End.

⁵⁹ Page 3 of Appendix GB1 of the Green Belt Part Two Assessment (Sept 2017)

⁶⁰ Green Belt Part Two Assessment – Individual Site Assessment (2017) – p.3

Purpose c) – Safeguarding the countryside from encroachment

12.23 The Buckinghamshire Part One Green Belt Assessment (2016)⁶¹ identifies Parcel 60 which relates to the parcel of land between Marlow and Bourne End (including the application Site) as making a limited contribution towards safeguarding the countryside from encroachment. Parcel 60, taken as a whole was awarded a score of 2 out of 5 in the Part 1 Green Belt Assessment.

12.24 Given the despoiled nature of parcel 60 and the sporadic urbanised nature of the landscape, its overall score of 2 out of 5 is considered to be justified. When a finer grain assessment is undertaken of the application Site as a constituent part of Parcel 60, it is considered to represent one of the lowest scoring elements of Parcel 60 (save for those areas, which are clearly already urbanised such as the sewage works and/or Little Marlow). The following factors are considered to further reduce its score:

- a) The despoiled nature of the land, which is littered with rubble, bunds, and small spoil heaps.
- b) The impact of the A404 both visually and aurally, which encroaches significantly into the Site significantly detracting from the sense of open, rural undeveloped tranquillity;
- c) The impact of Marlow Road (A4155) both visually and aurally;
- d) The impact of the dog grooming centre and the sporadic collection of buildings associated with it (notably this development post-dates the Council's Part Two Green Belt Assessment);
- e) Westhorpe House and the 56 Park homes immediately adjacent, which already encroach into this space;
- f) Crown Plaza Hotel including its access and illumination. It is acknowledged that the Crown Plaza is not located within the Site, but it does add to the general urban encroachment into the area, particularly at night when the water features are illuminated; and,
- g) Westhorpe Water Sports Club and the residential development that lines Westhorpe Farm Lane.
- h) A further piece of built form to the east (beyond the immediate locality of the Site) is the sewage plant, which is a considerable industrial plant, and has a noticeable effect on the wider character of the area.

These factors all serve to encroach into the Green Belt and detract from the purposes of including land in the Green Belt.

⁶¹ Buckinghamshire Green Belt Part 1 Assessment 2016 p.81

12.25 The Council's Green Belt Part Two – Individual Site Assessment (Sept 2017) gave the Site a score of 3 when assessing its impact on preventing neighbouring towns from merging⁶². The assessment appears to be desk based and does not have regard to the damaged nature of the land (spoil and rubble), the aural disturbance or 'Dogs Best Friend' dog day care business and therefore is not as up to date as the current appraisal. The final score is also not consistent with the opening comment which states *'The sporadic development in GA60 results in an overall semi-urban character'*. We would agree with the council's overall assessment that the Site and wider area has a 'semiurban character'. This supports our view that the Site, when assessed against the contribution it makes to safeguarding the countryside from encroachment, should be awarded a score of 2.

Purpose d) – To preserve the setting and special character of historic towns

12.26 The Buckinghamshire Green Belt Assessment (2016) identifies Parcel 60, of which the Site form a part, as making no contribution to preserving the setting and special character of historic towns. This is echoed in the Green Belt Part Two – Individual Site Assessment (Sept 2017), which also gave the Site a score of zero when assessing its impact on the setting and special character of historic towns⁶³.

12.27 This is considered to represent a fair assessment of the Parcel's impact on the special character of historic towns. Similarly, the Site, if taken in isolation, is not considered to make a contribution towards preserving the setting and special character of historic towns. The historic centre of Marlow is a significant distance from the Site and visually and spatially separated by the suburbs of Marlow, which includes Globe Park Industrial Estate and the A404 (a very significant engineering work in its own right).

Purpose e) – To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

12.28 This purpose will not be compromised because the sequential test has demonstrated that there are no alternative urban sites, and Marlow Film Studios cannot be disaggregated. Therefore, there is no conflict with this policy purpose.

12.29 It should be noted that the Site sits on a former quarry, which was landfilled, and therefore is despoiled land that has a history of industrial activity. Due to the historic quarrying and landfill activities on the Site, it currently has a despoiled appearance with no prospect of further restoration or alternative use such as agriculture due to the historic land use. Marlow Film Studios, whilst not removing the landfill from the Site, would regenerate the land and bring the Site back into productive use.

⁶² Green Belt Part Two Assessment – Individual Site Assessment (2017) – p.3

⁶³ Green Belt Part Two Assessment – Individual Site Assessment (2017) – p.3

Conclusion on Green Belt Purposes

- 12.30 Having assessed the Site against the five Green Belt purposes, it is found to not conflict with two of the five purposes (d and e). Of the remaining three, it would make a low contribution to purpose c, and a modest contribution to purposes a and b. Mindful of the size and scale of Marlow Film Studios, and the geographic context (i.e. the South East of England with large swathes of Green Belt and numerous built-up areas), it is inevitable that the development would have some impact upon the Green Belt.
- 12.31 Taken in the context of the wider Buckinghamshire Green Belt Assessment and the much larger Parcel 60 (of which the Site forms a part), it is considered to have less conflict with the Green Belt purposes than the larger parcel. This broadly echoes the findings of the Council's Green Belt part 2 Assessment, which also found the Site to be less impactful than the wider Parcel 60. There was broad agreement between the Council and the applicant save for the issue of encroachment.
- 12.32 This is principally because, when assessed at a finer grain, the impact on merging towns and encroachment is reduced. It is also noteworthy that Parcel 60, within which the application Site is located, is scored as being less valuable than Parcel 43b, which includes the Council's largest (former) Green Belt employment allocation. Therefore, whilst substantial weight must be afforded to the Green Belt harm overall, the level of harm is reduced due to the fact the Site provides, at most, a moderate contribution to the Green Belt purposes.

Use of Land within the Green Belt

- 12.33 Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to (para. 145 of the Framework):
- provide access;
 - provide opportunities for outdoor sport and recreation;
 - retain and enhance landscapes, visual amenity, and biodiversity; or
 - improve damaged and derelict land.
- 12.34 This is an encouragement to make better use of Green Belt land once defined within the context of its principal purposes. The extent to which the proposals contribute to the beneficial use of land in the Green Belt is a material consideration and is assessed below.

Provide Access

- 12.35 Other than the Public Right of Way (ref: LMA/20/1) that traverses the Site from East to West, there is no permitted public access on the Site, albeit some public access is currently not opposed. Marlow Film Studios will include improvements to the Public Right of Way that traverses the Site, provide permissive public access to Plot 4 (with some time and space restrictions), the potential to park on an agreed timetable (to be agreed) in the southern car park to access the land, facilitate connections into the wider formal public and informal footpath network and contribute to

improving connections between Marlow (A404/A4155 Junction and Fieldhouse Lane), the application Site and land to the south and east. Therefore, Marlow Film Studios makes significant enhancements to the Green Belt and countryside. This reduces the Green Belt harm and consequently weighs in favour of the grant of planning permission.

Provide opportunities for outdoor sport and recreation

- 12.36 Other than walking the Public Right of Way (ref: LMA/20/1) the Site does not currently provide any formal opportunities for outdoor sport or recreation. Marlow Film Studios will introduce new provision for outdoor recreation, with Plot 4 proposed to be publicly accessible on a permissive basis. The cultural, educational, and recreational facility located on Plot 4 will be used for a variety of community and educational purposes and can be used in connection with the public use of the land. Plot 4 and the facility linked to the land, will be made available to the public on occasion as a community and cultural space in connection with the public use of Plot 4. A Café and parking will also be located on Plot 2a.
- 12.37 Developer contributions for walk/cycle connections, linked to the grant of planning permission, will also provide opportunities for access to the land and outdoor recreation.
- 12.38 The walk and cycle improvements will improve access to the Council's outdoor running track, which is located to the east of the Site, and is currently poorly connected to the walk/cycle network. This will add to the attractiveness of this existing outdoor sports facility.
- 12.39 Therefore, Marlow Film Studios both directly and indirectly will provide opportunities for outdoor sport and recreation. This reduces the Green Belt harm and consequently weighs in favour of the granted planning permission.

Retain and enhance landscapes, visual amenity, and biodiversity; or improve damaged or derelict land.

- 12.40 The Site has been previously quarried, landfilled and then capped. Consequently, it has a damaged/despoiled appearance, which is in clear evidence on close inspection and from aerial photography. The lakes that pepper the wider landscape, whilst of ecological value, have a clear man-made appearance with steep sides and therefore point to the landscape's industrial quarrying past. The loss of elements of this disturbed landscape is of limited value. Notwithstanding the value of the existing landscape it is acknowledged that landscape harm will occur as a consequence of the urbanisation of this space.
- 12.41 Through the masterplanning and landscape design process the landscape and visual amenity implications of Marlow Film Studios have been managed to minimise the negative effects. Existing trees and hedging have been largely retained, structural boundary vegetation has been introduced and enhanced to soften the impact of the development in the landscape, green roofs have been incorporated on all soundstages and structural tree planting, in accordance with the Council's 25% canopy cover policy, is proposed to be delivered throughout the development (Marlow Film Studios delivers 32% canopy cover). The design approach will serve to minimise the

impact on the landscape and the setting of adjacent landscapes thereby minimising its impact on the area. Notwithstanding this, it is acknowledged that Marlow Film Studios will still be visible within the landscape and therefore outstanding design is proposed to ensure any views of the development are of a high quality and any views are of a beautiful and sustainable place.

- 12.42 Extensive work has been undertaken in the design process to ensure the biodiversity potential of the Site has been maximised. On-site ecological features have been retained where possible/practicable, existing features have been enhanced as part of the programme of ecological works and entirely new features such as green roofs are proposed to be created. In addition, as set out in paras. 9.119-9.127, Marlow Film Studios will achieve the emerging national biodiversity net gain requirement of 10%, and our own voluntary target of +20% net gain. The habitat provided will be covered by a 30-year conservation covenant and meet the standards of the coming statutory framework once passed into law. It is hoped that the biodiversity net gain will be delivered on nearby land (also likely in the Green Belt), thereby amplifying the Green Belt gains.
- 12.43 Marlow Film Studios, therefore, will minimise its impact on the landscape through good design, and where visible, has been designed to be beautiful. Marlow Film Studios represents a productive use of this damaged land. The potential significant off-Site net gain in biodiversity (10-20%), assuming it can be delivered in the Green Belt, also represents a significant benefit.

Conclusion on the use of land within the Green Belt

- 12.44 Overall, the development will have a number of positive effects upon the opportunity to secure the beneficial use of land within the Green Belt. This is due primarily to: the existing poor condition of the land with no formal public access beyond the Public Right of Way; improved access and recreational use; the quality of the design; approach to landscaping; and the biodiversity net gain improvement. Where Marlow Film Studios will have an urbanising impact on the landscape, this impact has been minimised through good design.

Conclusion on the overall assessment of harm to the Green Belt

- 12.45 Taking Green Belt as a whole, in order to provide an input to the planning balance, it is accepted that Marlow Film Studios:
- When taken as a whole, is inappropriate development and, by definition, harmful to the Green Belt. It would also impact on openness.
 - Would result in a degree of harm to the Green Belt purposes in terms of expanding an existing large built-up area, impact on the gap between the town of Marlow and Bourne End and resulting in a degree of encroachment; and,
 - Would have an impact on landscape character by degree of change from a restored quarry. Although, this needs to be balanced against the quality of the design, biodiversity improvements (assuming 10-20% off-Site improvements) and the value in bringing this damaged landscape back into productive use.

12.46 In accordance with paragraph 148 of the Framework the identified harm to the Green Belt arising from Marlow Film Studios should be given substantial weight in the determination of the application. However, the harm to which the weight is put, needs to reflect the degree of harm to the purposes and aims of the Green Belt and indeed the fact that Marlow Film Studios makes a positive contribution to several of the stated Green Belt aims.

Very Special Circumstances

12.47 The key balancing consideration is whether this harm is clearly outweighed by other considerations, such that very special circumstances exist so as to justify a grant of planning permission. The question is not whether any one benefit is a very special circumstance, but rather whether all the benefits, taken together, clearly outweigh the harm.

12.48 On the basis that Marlow Film Studios constitutes inappropriate development within the Green Belt, very special circumstances are required to justify Marlow Film Studios. These very special circumstances are summarised as:

- (1) **Very Special Circumstance 1** – Socio-Economic Benefits
- (2) **Very Special Circumstance 2** – Meeting the need for film and television facilities.
- (3) **Very Special Circumstance 3** – Meeting local and national government policy.
- (4) **Very Special Circumstance 4** – The requirement to co-locate with other comparative facilities within the West London Cluster

12.49 These Very Special Circumstances are examined in greater detail in the remainder of this chapter.

Very Special Circumstance 1 - Socio-Economic Benefits – to the national and local economy.

12.50 A development of the scale and type proposed has the potential to bring substantial economic benefits both directly and indirectly – locally and nationally.

12.51 The investment is being proposed at a time when the global pandemic of COVID-19 has had a substantial adverse impact on the national economy in a short passage of time. The impacts of Brexit and war in Ukraine is also impacting on the recovery. The impact of all three are likely to have far reaching economic consequences. This context has added urgency to the delivery of new studio space. The Site is deliverable (achievable, available, and suitable) and therefore assuming planning permission is secured in 2022, phase 1 would be capable of being delivered as early as Q2 2025. As such, the economic impacts from the development will be felt relatively swiftly. This amplifies the weight that should be attributed to the economic benefits that will flow from the scheme, albeit these economic benefits remain significant in the event the grant of planning permission is delayed beyond 2022.

12.52 The Economic Case sets out the predicted Economic and Social impacts of Marlow Film Studios. The Economic Impacts relate to the: Construction Phase, Operational Phase, Economic Output, Tax Revenue, Exports and Production Spend. The social impacts relate to: Social Tourism, Creative Industries, Employment and Skills, National and Local Policy and Health. These are summarised as follows:

Economic Impacts

Construction Phase

- 1) 9130 implied job years over a construction period of around 44 months from Q3 of 2023 to Q1 of 2027. An average of 2550 construction jobs on-site throughout the construction period.
- 2) Construction workers are expected to spend approximately 7 million in the local area over the duration of the construction period.
- 3) Employment and Skills Strategy – Outlines commitments to maximise opportunities to upskill local people during the construction phase (this is addressed in more detail in the social impacts section below).

Operational Phase

- 4) Marlow Film Studios would lead to the creation of an estimated 1,780-2,415 direct full time equivalent (FTE) jobs.
- 5) It is estimated that Marlow Film Studios would support a net additional total of up to 3,685 FTEs jobs, equivalent to up to 4,180 jobs when accounting for part-time working patterns.
- 6) Marlow Film Studios could deliver up to 17% of the county's planned future economic growth.

Economic Output

- 7) Direct and indirect employment supported by Marlow Film Studios would lead to an increase in direct and indirect GVA of up to £338m per annum.

Tax Revenue

- 8) Marlow Film Studios would lead to additional annual Exchequer contributions of between £78m and £105m per year.

Exports

- 9) Marlow Film Studios would lead to up to a £102m increase in the value of the UK's exports on an annual basis.

Production Spend In the movies

- 10) Assuming that 67% of production expenditure is spent in the wider economy, Marlow Film Studios is likely to support between £130m - £155m of production expenditure for businesses in the WLC each year.

Social and Wider Impacts

Tourism

- 11) Major productions have significant spill over effects to the local and national economies as they attract tourists stimulated by the desire to visit locations that have hosted major films⁶⁴. Research in 2018 found that 7% of all tourists to the UK cited visiting a film or TV set location as their primary reason to visit the UK⁶⁵. This demonstrates the draw of the sector in creating tourism and its associated economic benefits. Marlow Film Studios would build on this, helping to increase positive perceptions of 'brand UK'. An increase in tourism would provide economic stimulus to the Wycombe and wider Buckinghamshire economies. This stimulus would help support Buckinghamshire's economic recovery, in line with the Economic Recovery Plan.

Creative Industries

- 12) The Creative Industries Sector Deal was launched in 2018 with the aim of doubling Britain's share of the global creative immersive content market by 2025. Creative clusters are at the heart of the Sector Deal, with policies designed to encourage the development of such clusters.

Employment and Skills

- 13) The applicant is committed to producing a best-in-class employment and skills programme. Central to this is the establishment of the proposed Culture and Skills Academy on Site (Plot 4). This facility would be approximately 11,700 sqft, and will provide a platform to deliver cultural, educational, and recreational resources. The skills programme, which is set out in detail in the Skills and Workforce Development Plan, will include:
 - a) Engagement with local schools (primary and secondary)

⁶⁴ Olsberg and Nordicity, 2015. Economic Contribution of the UK's Film, High-End TV, Video Game, and Animation Programming Sectors

⁶⁵ VisitBritain, 2018. Film and TV locations as a driver of tourism

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- b) Further and higher education programmes (inc. Bucks New University, National Film and Television School and Bucks Skill Show).
 - c) Pathways for re-skilling and life-long learning (inc. a local screen supplier directory, training and jobs fairs, promotion of local jobs, links with Buckinghamshire Council, Buckinghamshire Skills Hub and Job Centre Plus).
 - d) Studio camps (inc. 30 free places per annum of pupils in the local school catchment area).
 - e) Employment and Skills Support (inc. at least 30 new trainee positions at a cost of £104,000 pa for 5 years with 66% from the local area, 7 bursaries at a cost of £105,000pa, the cost of supporting an employment of a part-time skills coordinator).
 - f) Skills and Training Events (inc. CPD events, construction job apprenticeships)
 - g) Community engagement programmes.
 - h) Themed cultural events in the Skills and Culture Academy (inc. access to the cinema and screening room, BAFTA events etc.).
 - i) Environmental, social and governance (i.e. an independent ESG audit).
 - j) The social value of full-time employment for a single individual is £14,430 per person. Assuming that five percent of the individuals gaining direct employment on-site came from out of work, this would result in approximately £1.1m in direct social value.
 - k) The social value of vocational training is £1,120 per person. The Employment and Skills Strategy targets to provide thirty trainees at the studio each year. If they receive vocational training specific to the industry, this would generate approximately £45,900 in social value.

Conclusion – Very Special Circumstance 1

12.53 The socio-economic benefits are substantial. The level of job creation and wider suite of socio-economic benefits is a significant material consideration in any economic and social context. The current supportive central government policy position and current economic climate increases the weight that should be attributed to the socio-economic case. The economic case represents a very special circumstance both in isolation and as part of a cumulative case.

12.54 All the matters above are material considerations to weigh in the decision-making balance. The very special circumstances advanced, whether taken

in isolation or cumulatively, are considered to substantially outweigh the harm to the Green Belt by reason of inappropriateness, and any other harm resulting from Marlow Film Studios. Other harms and benefits will be assessed in the planning balance.

Very Special Circumstance 2 – Meeting the need for Film and Television facilities.

Growth in Demand for the UK Film and TV Sector

- 12.55 The Economic Case sets out that the film and TV industry is one of the fastest growing sectors globally, driven by the rise of TV streaming services. The percentage of time spent streaming content nearly doubled between 2018 and 2019 and Netflix subscriptions increased by an average of 30% each year between 2012 and 2020⁶⁶. Now nearly half of UK households have a Netflix subscription. Disney+ attracted over 100m global subscriptions in its first sixteen months⁶⁷ and forecasts that subscriber numbers will reach 230m by 2024⁶⁸.
- 12.56 The UK is a major player in global film production. The number of films produced in the UK increased tenfold between 1999 and 2020⁶⁹. In 2019, 43% of high budget films made in the UK were in the top-grossing films of the year, compared to 18% in California⁷⁰. Combined production spend for film and TV in the UK has increased by 280% from 2013 to 2021. This growth in UK film and TV spend is underpinned by a consistently growing feature film sector alongside a rapidly growing TV sector. Production spend on TV has increased tenfold from 2013 to 2021, overtaking spend on feature films in 2020 (£1.6bn compared to £1.5bn)⁷¹. Despite many major productions halting during the COVID-19 pandemic, the film and television sector hit record highs for production spend in 2021. In particular, television production spend reached new heights of £4.1bn in 2021, almost double the previous record (£2.2bn in 2019).
- 12.57 Both the creative industries as a whole and the film and TV sector specifically have been showing positive growth in recent years. The Creative industries accounted for £116bn of GVA in 2019, equivalent to £318m per day, supporting over two million jobs.
- 12.58 Furthermore, the creative industries are growing faster than the overall UK economy⁷². Between 2010 and 2019, the contribution of GVA from this sector has increased by £47bn, an increase of 68% compared to a 36%

⁶⁶ Lambert smith Hampton, 2021. The UK and Ireland Film & TV Studio Property Market 2021.

⁶⁷ Lambert smith Hampton, 2021. The UK and Ireland Film & TV Studio Property Market 2021.

⁶⁸ Variety, 9 Feb 2022 - <https://variety.com/2022/biz/news/disney-plus-subscribers-2021-earnings-1235175715/>

⁶⁹ The-Numbers.com

⁷⁰ Film LA, 2020. Feature Films: A Profile of Production 2018.

⁷¹ BFI, 2022. Film, high-end television, and animation programmes production in the UK: full-year 2021.

⁷² HM Government, 2018. Export Strategy.

increase in UK total GVA over the same period⁷³. The contribution of the creative industries cannot be understated.

12.59 The sector deal notes that film inward investment in the UK grew by 92% in the five years to 2017, while television grew even faster at 162%. This growth was expected to continue if further supply was delivered in the appropriate locations: “with substantial increases in studio capacity and investment in skills, it is feasible that in the period to 2025 our revenues could nearly double to approximately £4bn a year”. The deal further noted that the film and television sector specifically has enormous potential given growing global demand for British creative content⁷⁴.

12.60 The UK film and TV sector makes a significant economic contribution to the UK economy. It:

- a) Supports significant employment - 173,000 jobs in 2019.
- b) Employs highly skilled individuals - 61% of jobs in the sector are held by people with a degree level qualification or higher.
- c) Generates significant economic activity – £19.5bn in gross value added (GVA)
- d) Is highly productive – average output (GVA) per employee (£112,500).
- e) Generates an important trade surplus - £4.3bn in 2019.
- f) Increases tourism (‘screen tourism’) - £893m spent in the film related tourism segment in 2018.

12.61 The Economic Case sets out that in the year 2021, film and television combined attracted £4.8bn worth of inward investment⁷⁵. This contributed to an overall production spend of £5.6bn⁷⁶. This shows the sector has been growing even quicker than the target rate set in the sector deal, highlighting the great potential it has to deliver high levels of growth.

12.62 The Economic Case sets out that Global entertainment and media revenues grew by 22% between 2016 and 2021 and are projected to grow a further 18% to 2025⁷⁷. This means by 2025 the value of global entertainment and media revenues will equate to more than two-thirds of the value of the UK economy.

12.63 There has also been worldwide growth in the time we spend watching content, particularly streamed content. The percentage of time spent streaming content nearly doubled between 2018 and 2019⁷⁸. As of 2020, nearly one-fifth of television viewing in the U.S. comes from streaming services⁷⁹. Between 2019 and 2020, the number of global online video

⁷³ DCMS, 2021. DCMS Economic Estimates 2019: Gross Value Added

⁷⁴ DCMS, 2021. DCMS Economic Estimates 2019: Gross Value Added.

⁷⁵ BFI, 2022. Official 2021 BFI statistics reveal a record £5.64bn film and high-end TV production spend in the UK.

⁷⁶ BFI, 2022. Official 2021 BFI statistics reveal a record £5.64bn film and high-end TV production spend in the UK.

⁷⁷ PwC, 2021. Global Entertainment and Media Outlook 2021-2025

⁷⁸ Nielsen, 2020. The Nielsen total audience report: August 2020.

⁷⁹ Nielsen, 2020. The Nielsen total audience report: August 2020.

subscriptions increased by 26%, reaching 1.2bn subscriptions⁸⁰. This growth is expected to continue in the coming years, in fact, by 2025, subscriptions are expected to reach 1.6 billion worldwide. In tandem with this growing audience demand, new streaming platforms are entering the market at an accelerated pace. 2020 welcomed four new subscription video on demand (SVOD) platforms: Apple TV, HBO Max, Peacock, and Disney+. New SVOD platforms have created large audiences in a short amount of time. For example, Disney+ has already gained over 100 million subscribers since its launch in November 2020⁸¹ and forecasts a near doubling of subscribers in the next two years to 230m⁸².

- 12.64 Online services and TV broadcasters are moving away from third-party content and more towards creating their own content which can be sold worldwide, increasing demand for studio space capable of hosting big budget productions. Netflix has pledged to spend \$1bn in the UK on TV shows and films⁸³, with other major production companies, such as Amazon, Disney, and Apple, following suit.
- 12.65 The UK punches above its weight in total production spend, having overtaken California in production spend on high-end movies in 2015⁸⁴. The UK generated 126% more production spend in 2015 than California, despite hosting four less projects. In 2018, 43% of high budget films made in the UK were in the top-grossing films of the year, compared to 18% and 12% in California and New York respectively⁸⁵. The value of the UK's film sector is also 20% larger than Germany's and 50% larger than France's⁸⁶.
- 12.66 This trend intensified during the recovery from COVID-19, with spend on television in the UK hitting £4.1bn in 2021. This spend was almost twice as high as the previous record spend in the UK on television in 2019 (£2.2bn). In total, film & television spend in 2021 hit £5.6bn, attracting £4.8bn worth of inward investment. This is a new record which shows that the industry is exceeding even the challenging industry aspirations for growth⁸⁷.
- 12.67 Eighty-four percent of total spending on film and television production was from foreign direct investment (FDI) in 2021, showing the impact of the sector in terms of drawing money into the country from abroad⁸⁸. In 2019, whilst companies based in the UK spent \$5.2bn on film production worldwide, companies based outside of the UK spent \$21bn within the UK⁸⁹.

⁸⁰ Nielsen, 2020. The Nielsen total audience report: August 2020.

⁸¹ Lambert Smith Hampton, 2021. The UK & Ireland Film and TV Studio Property Market 2021.

⁸² Variety, 9 Feb 2022 - <https://variety.com/2022/biz/news/disney-plus-subscribers-2021-earnings-1235175715/>

⁸³ The Guardian, 2020. Netflix to spend \$1bn in UK in 2020 on TV shows and films.

⁸⁴ Variety, 2016. California was world's top film production centre in 2015, UK generated most spending.

⁸⁵ Film LA, 2020. Feature Films: A Profile of Production 2018.

⁸⁶ Oliver & Ohlbaum, 2018. The contribution of the UK-based film, TV and TV-related industries to the UK economy, and growth prospects to 2025.

⁸⁷ BFI, 2022. Official 2021 BFI statistics reveal a record £5.64bn film and high-end TV production spend in the UK.

⁸⁸ BFI, 2022. Official 2021 BFI statistics reveal a record £5.64bn film and high-end TV production spend in the UK.

⁸⁹ Olsberg SPI, 2020. Global Screen Production – The Impact of Film and Television Production on Economic Recovery from COVID-19.

The sector is therefore important for the UK Government's post Brexit aim to increase exports and Foreign Direct Investment⁹⁰. It was reported in World of Locations that Adrian Wootton, chair of British Film Commission stated:

"Inward investment spend on high-end TV drama being made in the UK increased 180% in a single year (2021, compared to the previous year) according to the British Film Commission. "They didn't just want to come in [to the UK] and go out again because so much of their production is high-end episodic, which requires a much longer base to it," Wootton explains of why streamers are making long-term commitments to the UK. "That shifts the paradigm dramatically from what it has been before."

12.68 Therefore, it can be concluded that the film and television sector is hugely important to the UK economy, both now and as a potential source of future growth. Therefore, there is great merit in meeting the need for stage space.

The Need for Stage Space in the UK

12.69 The Economic Case highlights that because of the growth in demand, film and television studios in the UK have struggled to meet demand for production space in recent years. There is acknowledged to be a severe shortage of studio space in the industry and only 31% of UK studio stage space is in purpose-built film studios suited to major film and TV drama productions. The lack of space has significant economic implications. Between 2016 and 2018 the UK lost out on an estimated 5-10 major movies per year, equivalent to almost £1bn of lost economic activity each year⁹¹. This is equivalent to losing the whole of the University of Warwick's economic contribution to the West Midlands each year, or the entire contribution of the agriculture and hunting sector in the South-East⁹².

12.70 Knight Frank estimate that the UK has approximately 6m sq ft worth of stage space⁹³. Lambert Smith Hampton estimate this to be at a similar level, stating that the UK currently supports around 4.2m sq ft of dedicated film and TV, as well as at least an additional 1.2m sq ft in a variety of alternate spaces for studio use.

12.71 In addition to the existing supply of stage space, the research also identified future pipeline of stage space in the West London Cluster. In total, approximately 3.8m sq ft of stage space has been announced to be coming forward over the next decade. This is also broadly consistent with the Nordicity research who found that 3.2m sq ft of stage space has been announced. This includes a mix of purpose-built stages, as well as conversions. It is highly unlikely that all of these projects will come forward. Many of these proposals are progressing slowly and must secure

⁹⁰ HM Government, 2018. Export Strategy.

⁹¹ PwC, 2018. Review of UK Film and High-End TV production facility market.

⁹² BiGGAR Economics, 2016. Economic Impact of the University of Warwick.

⁹³ Knight Frank, 2022. UK Film and Television Studios Market.

financing⁹⁴. Some studios may also be downscaled; others have temporary stages that will be removed.

- 12.72 It is widely acknowledged within the film and TV industry that the current supply of studios is insufficient to meet demand⁹⁵. Production companies have found it difficult to find stage space, particularly in the West London Cluster⁹⁶. The large studios that are capable of hosting high end feature films and television are operating at full capacity and have been for the past decade. Utilisation of Pinewood and Shepperton averaged 85% between 2014-18, broadly understood to represent full capacity⁹⁷.
- 12.73 There is a consensus that demand for stage space is outstripping supply and there is an urgent need for additional capacity. PwC estimated in 2018 that the UK is missing out on around 5-10 blockbuster films per year due to the lack of space. If not made in the UK, these blockbusters will be made elsewhere. Little permanent space has been added in the 4 years since 2018, but further pressure has been placed on existing facilities through greater demand.
- 12.74 Missing out on such productions contributes to the UK losing the equivalent of up to £950m a year⁹⁸. This number will rise if the number of productions missed out on increases, and if the value of the average production increases. If more space were available to host these major movies, the output of the sector would increase by around 5%. In the context of any economic outlook this is significant, but in the context of the recovery from the pandemic, this is an even more valuable opportunity for growth.
- 12.75 As the opportunities in the sector grow across the globe, this need is likely to increase in the coming years. The demand for studio space is therefore likely to be much higher than the 940,000 sq ft suggested by PwC. Various studies have estimated how much stage space could be required over the coming years. The exact number required varies by study, but all agree that a significant amount of space is required. Lambert Smith Hampton estimated 2.3m sq ft of stage space could be required by 2033, whilst Saffrey Champness suggested that more could be required (2.6m sq ft) over an even shorter period of time (by 2025)⁹⁹. CBRE further estimate that there is at least 2m sq ft in active demand in the market¹⁰⁰. Knight Frank is more bullish, anticipating a potential need of up to 6m sqft¹⁰¹. These existing forecasts for the requirement for new stage space vary in scale, but all of them agree that a significant amount of new space is required.

⁹⁴ Lambert Smith Hampton, 2021. The UK & Ireland Film & TV Studio Property Market 2021.

⁹⁵ Lambert Smith Hampton, 2021. The UK & Ireland Film & TV Studio Property Market 2021.

⁹⁶ Lambert Smith Hampton, 2021. The UK & Ireland Film & TV Studio Property Market 2021.

⁹⁷ Thurley Economics, 2018. The Case for Space – Shepperton Studios planned application for growth 2018.

⁹⁸ PwC, 2018. Review of UK Film and High-End TV production facility market

⁹⁹ Lambert Smith Hampton (2021): The UK & Ireland Film & TV Studio Property Market and Saffrey Champness (2021): Bray Film Studios Economic Impact Analysis

¹⁰⁰ CBRE, 2021. The UK takes a leading role for TV and film production, according to new CBRE report

¹⁰¹ Knight Frank, 2022. Taking Centre Stage

- 12.76 By 2033, even with Marlow Film Studios and the other studios in the pipeline, additional studio space is still required, even in the most conservative scenario. The film and television industry is a constantly expanding and evolving market. The West London Cluster is responsible for 79% of the country’s turnover in film and television and requires the facilities to make the most of the new opportunities that arise.
- 12.77 The pipeline will make a significant contribution to the demand, but it is unlikely that all potential studios will be immediately delivered, largely due to timing of securing funding together with potential planning issues. In addition, some of the proposed pipeline is based in temporary space or repurposed buildings. Temporary studios cannot provide the certainty or all the facilities required for major productions. There is still a need for new purpose-built space which meets requirements for major blockbusters and television.
- 12.78 Marlow Film Studios would be well placed to contribute to alleviating supply shortages in the sector, providing high-quality, attractive studio space, which would enable the cluster to maximise its potential, and produce blockbusters that the UK has previously missed out on due to lack of space. The brand new purpose-built studios would be capable of hosting multiple high-budget productions. Fig. 5 below sets out the scale of the shortfall in production space and the contribution that Marlow Film Studios could make:

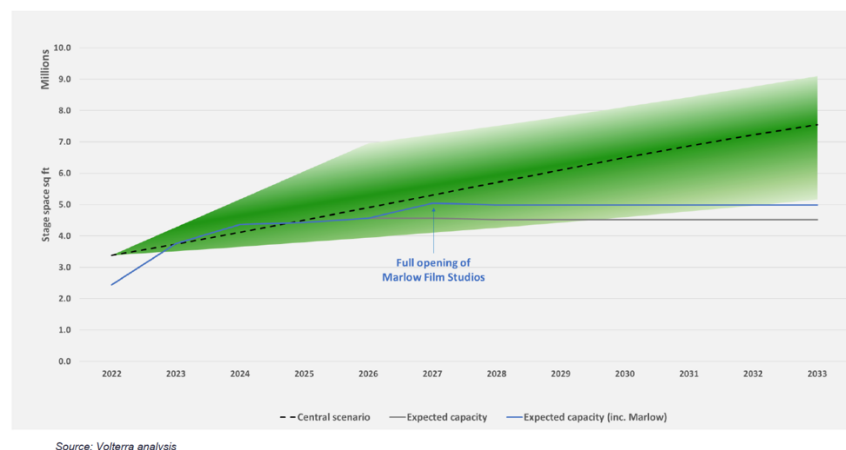


Fig. 5 – Film and Television Studio Space

- 12.79 Even if all of the announced potential studios come forward there would still be an additional requirement of 870,000 sq ft of stage space under the central scenario by 2033, and 2.4m sq ft in the high scenario.
- 12.80 Without further investment in studio space, inward investment could be displaced to other countries (i.e. Hungary, France etc.). It is clear that space in the West London Cluster specifically is key due to accessibility, clustering effects and infrastructure, and so Buckinghamshire urgently needs to build on its already world-leading offering. Building on past success is a recommended approach for economic development. Investment in the

cluster is more efficient than investment outside the cluster, and as a result Government policy favours cluster development¹⁰².

Conclusion – Very Special Circumstance 2

- 12.81 The film and television sector is hugely important to the UK economy, both now and as a potential source of future growth. There is currently insufficient stage space in the UK to meet demand both now and in the future. Marlow Film Studios is well placed to contribute to alleviating the supply shortages in the sector, providing high-quality, attractive studio space, which would enable the West London Cluster to maximise its potential, and produce blockbusters that the UK has previously missed out on due to lack of space. The brand new purpose-built studios would be capable of hosting multiple high-budget productions. Without further investment in studio space, inward investment could be displaced to other competitor countries.
- 12.82 The contribution that Marlow Film Studios can make to meeting the need for film and television space is substantial and represents a substantial planning benefit. The acute need for additional film and television space represents a very special circumstance both in isolation and as part of a cumulative case. It is considered to substantially outweigh the harm to the Green Belt by reason of inappropriateness, and any other harm, resulting from Marlow Film Studios. Other harms and benefits will be assessed in the planning balance.

Very Special Circumstance 3 – Meeting local and national government policy

- 12.83 The Economic Case (paras. 3.27 – 3.34 and 5.10 – 5.33) sets out that the creative industries are one of the UK government’s priority sectors, forming a key part of the Industrial Strategy.
- 12.84 Central and local government has published several documents highlighting the importance of the film and television sector to the national and local economy. These publications represent weighty ‘other’ material considerations in the determination of this planning application. These documents include: National Industrial Strategy 2017, Creative Industries Sector Deal 2018, Buckinghamshire Local Industrial Strategy 2019, Buckinghamshire LEP Strategic Economic Plan (2016–2031), Buckinghamshire Economic Recovery Plan 2020 and Buckinghamshire Local Skills Report 2022. A number of these documents post-date the adoption of the Local Plan and therefore represent more up-to-date material considerations than the Local Plan. These documents are summarised below:

National Industrial Strategy 2017 and Creative Industries Sector Deal 2018

- 12.85 The UK government published its industrial strategy in 2017. The strategy sets out several objectives with the aim of helping businesses to create better, higher-paying jobs and boosting productivity in the process.

¹⁰² HM Government (2018), Industrial Strategy, Creative Industries Sector Deal.

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- 12.86 Within the Industrial Strategy, the UK’s strength in the creative industries was noted, being referred to as a “world-class” industry that was growing at twice the rate of the whole economy¹⁰³. The film and television sector is one of the UK’s creative industries.
- 12.87 The creative industries are one of a few high growth sectors given a sector deal as part of the Industrial Strategy in 2018. This includes several key policies under the ‘five foundations of productivity’: ideas, people, infrastructure, business environment, and places. The aim is to support the growth of the creative industries by increasing exports of this sector, sustaining rapid growth, and boosting jobs.
- 12.88 The sector deal notes that film inward investment grew by 92% in the five years to 2017, while television grew even faster at 162%. This growth was expected to continue: “with substantial increases in studio capacity and investment in skills, it is feasible that in the period to 2025 our revenues could nearly double to approximately £4bn a year.” The deal further notes that the film and television sector specifically has enormous potential due to growing global demand for British creative content. The sector is of national significance and is of particular importance at a time of unprecedented uncertainty in the UK.¹⁰⁴

Buckinghamshire Local Industrial Strategy 2019

- 12.89 The Buckinghamshire Local Industrial Strategy sets out that Buckinghamshire has a highly productive and entrepreneurial economy with a dynamic and resilient employment base underpinned by a strong and high-quality business community. It identifies creative and digital as one of Buckinghamshire’s four internationally significant economic assets. Key aims of the strategy include:¹⁰⁵

“To consolidate a global creative industries capability and further support exporting and inward investment in the film, TV and games sector.”

“Enable communities to flourish, based around a ‘creative and digital’ cluster around High Wycombe, the National Film and Television School, and Pinewood Studios”

Buckinghamshire LEP Strategic Economic Plan (2016-2031)

- 12.90 Buckinghamshire LEP outlined their opportunities for growth in their Strategic Economic Plan (SEP)¹⁰⁶. Amongst various opportunities, film production is noted as a high-value, research-based business activity that can drive growth over the next decade. It is also mentioned as one of their priority sectors for growth, as part of the wider creative industries.

103 HM Government, 2017. Industrial Strategy

104 BEIS & DCMS, 2018. Creative industries: Sectoral Deal

105 MHCLG, 2019. Buckinghamshire Local Industrial Strategy.

106 Buckinghamshire LEP, 2020 – Economic Recovery Plan

Buckinghamshire Economic Recovery Plan – 2020

- 12.91 Buckinghamshire LEP are co-ordinating a Local Economic Recovery Plan for Buckinghamshire, which forms part of a wider place-based recovery programme. The film and television sector is identified as a growth sector by the Buckinghamshire Local Enterprise Partnership (LEP) and their recovery plan notes the importance of building on the existing assets so that it can be at the forefront of future growth. The LEP wishes to work to consolidate a global creative industries capability and further support exporting and inward investment in the film and television sector.

“There continues to be considerable demand for additional studio space and Buckinghamshire is well placed to provide the physical facilities and skills base to support growth.”¹⁰⁷

- 12.92 The plan builds on the foundations of the Local Industrial Strategy (‘LIS’) published in 2019 but prioritises those issues which the LIS did not address. It has stated an ambition to build on its internationally significant economic assets, of which, the creative and digital sectors is a major part.¹⁰⁸ Reference is made to the existing cluster of film and television businesses in the area, specifically referring to Pinewood Studios and creative businesses. One of the targets of the strategy is to establish a ‘creative and digital cluster’ around High Wycombe, the National Film and Television School, and Pinewood Studios. An identified specific action in support of recovery includes to back opportunities for new studio development at three locations, with Marlow¹⁰⁹ one such named location.

Buckinghamshire Local Skills Report 2022

- 12.93 Buckinghamshire’s Skills Advisory Panel (SAP) was established in 2019. It brings together local employers, skills providers, and other key stakeholders to better understand and resolve skills and recruitment challenges within Buckinghamshire. Film and television is noted as a local priority sector for investment in local jobs and skills, and as such is expected to play a leading role in providing employment and upscaling local residents over the coming decade. The report specifically cites Marlow as an area of interest¹¹⁰. The Buckinghamshire Local Skills Report specifically identifies that:

*“There are **twice as many creative industry jobs within the Buckinghamshire economy than the national average**, many of which are in the film and TV sector”¹¹¹*

*“**Thousands of jobs are expected to be created in the film and TV industry in and around Buckinghamshire over the next few years as the UK production boom continues**”¹¹²*

¹⁰⁷ P.14, Buckinghamshire Economic Recovery Plan 2020

¹⁰⁸ Buckinghamshire LEP, 2020. Economic Recovery Plan

¹⁰⁹ Buckinghamshire LEP, 2020, Economic Recovery Plan p.14-15

¹¹⁰ P.17 of Buckinghamshire Local Skills Report 2022

¹¹¹ P.17, Buckinghamshire Local Skills Report 2022

¹¹² P. 55, Buckinghamshire Local Skills Report 2022

12.94 By meeting these local aims, Marlow Film Studios can have a significant effect on the UK's national offer in the film and television sector.

Conclusion – Very Special Circumstance 3

- 12.95 The Economic Case sets out clearly the need for significant quantities of additional production space in the right places. It sets out the contribution that the West London Cluster can, and should, make (as implored by Local and National Industrial strategies) to meeting that need. The Economic Case clearly sets out the significance of Marlow within the cluster, the contribution that the unique offer can make and the clear benefits that will flow from the development.
- 12.96 The Economic Case highlights that local policy emphasises the importance of strengthening the film and television offer in Buckinghamshire. The sector is identified as a growth sector by the Buckinghamshire Local Enterprise Partnership (LEP) and their recovery plan notes the importance of building on the existing assets so that it can be at the forefront of future growth. The LEP wishes to work to consolidate a global creative industries capability and further support exporting and inward investment in the film and television sector. Buckinghamshire Skills Hub believe that film and television can play a leading role in providing employment and upskilling local residents over the coming decade:¹¹³
- 12.97 The National and Local strategies set out a clear and compelling need for the film and television industry to be accommodated within the UK, particularly the West London Cluster. There is a clear direction from national to local level of the importance of the creative sector and a need to address both the current and long-term economic needs of the sector. The Application Site offers the ideal opportunity to help deliver this goal. Marlow Film Studios is consistent with the industrial and recovery strategies and economic priorities of HM Government and Buckinghamshire LEP. The scheme therefore has strong support from the public sector on account of the clear public benefits that would flow from it. The Buckinghamshire LEP, 2020 Economic Recovery Plan and Local Skills Report post-dates the Development Plan, making it a more up-to-date consideration. This represents a weighty 'other' material consideration weighing heavily in favour of the grant of planning permission. This represents a very special circumstance both in isolation and as part of a cumulative case and should be afforded substantial weight in the decision-making process.

Very Special Circumstance 4 – The requirement to co-locate with other comparative facilities within the West London Cluster.

- 12.98 The accompanying Sequential Test demonstrates that the application Site is the most sequentially preferable deliverable (i.e. achievable, available, and suitable) Site within the West London Cluster (the identified search area).
- 12.99 The application Site is the best location in which to deliver a new studio that will meet the clearly identified need for studio space. It is also the sequentially most preferable Site to capture the benefits that would flow

¹¹³ Buckinghamshire Skills Hub, 2022. Buckinghamshire Local Skills Report.

from such a development. Failure to build the new studio at Marlow will lead to a loss of those benefits, most notably the local and national economic benefits.

12.100 The significance of the West London Cluster is set out in full on pages 29-36 of the Economic Case. The case for Marlow is set out in full on pages 6 & 7 and 37-52 of the Economic Case. These more detailed assessments are summarised below under the headings 'The Importance of the West London Cluster (WLC)' and 'Why Marlow Film Studio'.

The Importance of the west London Cluster (WLC)

- 12.101 The west London cluster is more than an unusually important collection of both regional, national, and international facilities. The physical facilities it contains have been used for a significant quantity and quality of historical film and television production; many of these projects have received worldwide acclaim and success.
- 12.102 Adding to this is a specialist ecosystem of suppliers and service companies, some recognised as global leaders, which have matured here for more than half a century.
- 12.103 However, a singular component in the success (around three quarters of the UK's film and television rapidly and consistently expanding turnover) is a cohort of crew and technicians who are unrivalled the world over and who live in this area. This crewbase is the principal reason the UK is beyond the USA, the single largest destination of global inward investment into this sector.
- 12.104 The components that determine the working life of these specialist craftspeople have multiple dimensions. They are almost entirely freelance, meaning that they are engaged by producers to work on a project-by-project basis.
- 12.105 Traditionally each engagement for freelance crew lasts on average between weeks and months. This is because each film or television project is uniquely assembled across many dozens of professional disciplines for shorter term contracts. A big budget film may shoot for four to six months, with a television series anything between three to twelve months. At 'wrap' these freelance specialists move on to other work and projects. Sometimes they move as teams, but often individuals may have a broad range of colleague groups they work with across a career as it develops. Often subsequent work is within the west London cluster, however the best British professionals in this sector are often on demand all over the world.
- 12.106 As these short term positions are normally chosen on the basis of excellence, this means competition for roles is intense and hurdles to entry are set high to ensure films and television is habitually made with a filter for experience, craft and previous credits on a CV.
- 12.107 The west London cluster has a crewbase built on three generations of excellence, which is a key reason that the human capital is highly agglomerated locally.

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- 12.108 As the rolling credits at the end of a feature film display, each project is a collection of hundreds of varied specialist jobs. Assembly of a crew for each short term project is a considerable art in itself. The talent pool around the west London cluster is particularly deep with an exceptional level of competence.
- 12.109 An important concept here is the production base. This is the working HQ for production. Owing to the creative needs requiring different filming settings, crew collective bargaining agreements set out the maximum daily travel time or maximum distance commitments to be included as key terms in standard in freelance contracts (see PACT and BECTU agreement). Filming is, by its very nature, highly agile. In short order a crew might be working on a night shoot in a forest, the next day in a central London office block. No two scripts or schedules are ever the same.
- 12.110 A defacto worldwide standard for reasonable daily travel before overnight accommodation is necessary is around 30 miles. In Los Angeles this is known as the TMZ (thirty mile zone). Given the complex and ever-changing daily working requirements of filming, it has been established through precedent that travel at the end and beginning of the day from work is a material risk to the well-being and productivity of crew talent.
- 12.111 This travel to 'set' can change substantially from day to day, but producers are sensitive to the exacting travel needs of requiring hundreds of specialists to assemble daily, sometimes at different locations, potentially in different countries on bespoke schedules.
- 12.112 In the UK the crew collective bargaining agreements set contracts around thirty road miles being permitted from a production base every day of engagement. Together these points mean that crews and companies are highly clustered around recognised production bases. This applies not just to a studio but the wider production cluster itself. Any cluster must have physical capacity to take more than a few productions to ensure long term viability.
- 12.113 Here it is useful to compare this requirement for mobility and agility with other infrastructure projects. Most other major projects are based on permanence of staff on payroll. Recruitment and training of staff for a new building or campus only requires perhaps one main permanent relocation of staff. Here the freelance workforce has little ability to pick their place of work; they have skills and must travel. This can be exhausting and stressful, so additional quality, well placed facilities are essential to the future success of the unique organisational requirements of this creative industry, but here more particularly for the WLC. Work life balance has often been a challenge for this important cultural industry, so a workforce suitable site is a key consideration of how to meet the need for production facilities.
- 12.114 Essentially crew live in postcodes very closely connected to filmmaking bases. The only geography crew can plan their lives around is where the short-term work is likely to be and their home life. These two poles are essential to understanding the physical needs of the industry.
- 12.115 The further a facility is based from another or from the centre of a cluster, the more taxing it is to ask crews to travel or relocate (whether to work or

train) and the harder it becomes to fill the hundreds of exacting roles required for the most prestigious and economically important productions.

- 12.116 Collective bargaining agreements and the 30 mile daily travel limit puts a large contractual obstacle around possible film studio sites and their viability, particularly those aiming to capture the very highest end of spend and quality in which the WLC has a commanding global lead.
- 12.117 While it is normally possible only to make assumptions about business locations, data about human crew capital is harder to come by. Where do freelancers actually live? Anecdotally it is understood that around 20,000 crew live in a highly aggregated but broadly distributed grouping to the west and northwest of London.
- 12.118 The BFC has undertaken bespoke research which clarifies this (see Appendix 6). Combining their analysis and a fair estimate of 20,000 crew who have worked at the highest end of the sector reveals the following - Approximately 600 (around 40% of the crew needs of Marlow) live within 15 minutes of the Marlow Film Studio Site. This expands to around 60% of the entire West London Cluster crew base who can viably use Marlow given that one hour of travel time equates roughly to the thirty mile rule.
- 12.119 Building a new crewbase is a prohibitive barrier to entry, so the benefits of being co-located with this clear cohort of outstanding talent is essential both for viability but also to make training coming generations possible. This has been done with exceptional ongoing results in the west London cluster with world beating institutions like the National Film and Television Studios, but much of this resource is on the job training as crew gain credits for their CVs. Asking large numbers of crew to permanently relocate to train the next generations in unrecognised locations is a very big hurdle to creating permanence.
- 12.120 A remote crew placement for months might be achievable, as is often the case. However, the social, cultural, and creative status of London is perhaps the biggest anchor to inward investment. To replicate the two layers of global significance and human geography to reinforce production. Hubs in more remote regions (at least in the minds of inward investors) is likely to be possible but relies on the viability of global leadership in the west London cluster.
- 12.121 The Economic Case sets out that clusters are widely acknowledged and accepted. Supporting and building on existing clusters forms a key government objective to deliver future economic growth¹¹⁴. Clusters provide ecosystems of interconnected firms, individuals, and institutions within a particular field. They drive economic growth in the modern economy. Supporting clusters and their associated benefits of productivity, innovation and new business growth has become an important policy objective in the UK and further afield. There is a consensus that governments should “reinforce and build on existing and emerging clusters rather than attempt to create entirely new ones”¹¹⁵. New business growth within a cluster results in a

¹¹⁴ See para. 83 of the Framework.

¹¹⁵ Porter, M., 1998. Systems of innovation: growth, competitiveness, and employment.

positive feedback loop, benefitting all the members of the cluster. As global competition heightens, and with the uncertainty caused by Brexit and COVID-19, it is even more important that we nurture and invest in our strengths. In the UK these strengths are geographically/spatially fixed within the West London Cluster.

12.122 The global major film and television sector is a good example of a field that is dominated by international clusters and hubs, with several well-known examples such as Hollywood, Vancouver, and Budapest. It is unanimously accepted by respected industry bodies that the West London Cluster is the only place in the UK that competes on this global scale and can attract the highest budget productions. Nowhere else in the UK provides a ‘critical mass’ of skills, infrastructure, capabilities, reputation, and facilities required to drive a continuous pipeline for major films and television at the highest budgets. West London is the dominant location for high-end producers and the growing market for television. Between 2015 and 2020, London produced over double the number of blockbusters compared to the second largest film cluster, Atlanta¹¹⁶. Nearly four fifths (79%) of the country’s turnover in film and television and 70% of companies are concentrated in London and the South East¹¹⁷.

12.123 The Buckinghamshire Local Skills Report notes that Marlow can play a part in the West London Cluster’s offer with regards to film and television production space:

“Buckinghamshire’s screen sector sits within a wider West of London Screen Cluster, which includes studios at Leavesden, Elstree, Shepperton, Long Cross, Bovingdon, Didcot and, within the next few years, Reading and potentially Marlow”¹¹⁸

12.124 Existing studios in the cluster are full. Pinewood, Shepperton and WB Leavesden, the Cluster’s world class studios that can accommodate major productions, are at capacity. These three biggest studios, the only ones capable of hosting major blockbusters and television in the UK, are all tied down on long leases to US businesses for the medium term. This reduces the space available to other production companies¹¹⁹.

12.125 PwC estimated in 2018 that 940,000 sqft of additional studio space was needed to accommodate footloose blockbusters alone¹²⁰. As the opportunities in the sector grow across the globe, this need is likely to increase in the coming years. Various studies have estimated how much stage space could be required over the coming years. Lambert Smith Hampton estimated 2.3m sqft of stage space could be required by 2033,

¹¹⁶ The-Numbers.com – movie budgets; IMDB

¹¹⁷ BFI, 2019. The UK Film Economy

¹¹⁸ Buckinghamshire Skills Hub, 2022. Buckinghamshire Local Skills Report.

¹¹⁹ Pinewood and Shepperton were both tied down to long leasing deals in 2019. Disney entered into an agreement with Pinewood to take most of their stages for at least a decade. Netflix entered into a similar length deal at Shepperton. Leavesden has been owned by Warner Bros since 2010.

¹²⁰ PwC, 2018. Review of UK Film and High-End TV production facility market

whilst Saffrey Champness suggested that more could be required (2.6m sqft) over an even shorter period of time (by 2025).^{121,122}

- 12.126 Expansions of Pinewood and Shepperton, and several other new studios in and around London, will make a significant contribution to meeting the need for new space. However, due to the steep trajectory of growth, there is demand for more studios close to the thriving local cluster beyond what is currently in the pipeline, particularly for purpose-built space.
- 12.127 The Economic Case presents several forecasts for the requirement for new stage space in the West London Cluster to 2033, reflecting the uncertainty about changes in how we consume media, how we exit from the pandemic and growth in the economy. Even under the lowest forecast, taking into account the pipeline and Marlow Film Studios, over 175,000 sqft of extra stage space would still be required to meet demand by 2033 (see Fig 3, p.9 of the Economic Case). Based on the core forecast in the Economic Case, there would be need for an additional 2.6m sqft of stage space by 2033 including what is already expected to be provided in the pipeline.
- 12.128 On the basis of the above, and the full case set out in the Economic Case, the importance of the West London Cluster is clear. Similarly, the necessity of locating Marlow Film Studios within the cluster and the mutually beneficial nature of doing so, is also clear. Marlow Film Studios benefits from the Cluster and the Cluster benefits from Marlow Film Studios forming part of it.

Why Marlow – Economic and Social Drivers

- 12.129 The Economic Case sets out the following social and economic factors that drives the attractiveness of Marlow for the location of the new film studio:
- 12.130 **Growing sector:** the global film and television sector is one of the fastest growing sectors and is projected to grow significantly, driven by increased demand for streaming.
- 12.131 **National significance:** there is a clear need for more studio space in the WLC if the UK is going to maximise the potential of the growing film and television sector and achieve local and national policy to grow film inward investment and drive the economic recovery from COVID-19. The UK is already missing out on 5 – 10 blockbusters per year according to PwC research¹²³. Expansions of Pinewood and Shepperton and several other planned new studios will make an important contribution to the need. However, there is still demand for additional stage space. Marlow Film Studios provides the space and facilities to help meet this demand. The UK competes on a global stage for this activity. If the right space is not provided in the right location, then the UK will continue to lose out to other countries and risk losing its world leading position. The need to provide studio space and enable growth in the sector is therefore of national importance.

¹²¹ Lambert Smith Hampton (2021): The UK & Ireland Film & TV Studio Property Market

¹²² Saffrey Champness (2021): Bray Film Studios Economic Impact Analysis

¹²³ PwC, 2018. Review of UK Film and High-End TV production facility market

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- 12.132 **Location and Crewbase:** the WLC is the only part of the UK that has the critical mass of sufficient resources and competencies, including a vast pool of skills and talent, to accommodate major blockbusters and television. Following the expansions of Pinewood, Shepperton and other studios, the Sequential Assessment has demonstrated that Marlow is the sequentially most preferable location in the cluster for delivering this scale and quality of film and television space.
- 12.133 **Positive feedback loop:** research and government policy support cluster development. Investment in the Cluster would increase the attractiveness, efficiency, and brand of the whole Cluster, resulting in a positive feedback loop which amplifies the benefits of the Cluster for all members, supporting significant economic benefits to the UK economy.
- 12.134 **Purpose built:** only 31% of studios in the UK are purpose built, with much of the supply made up of temporary studios or repurposed buildings / conversions¹²⁴. Marlow Film Studios has been designed to optimise the space for productions by creating clusters of different spaces within the development to respond to the bespoke needs of different productions. There is a shortage of space in general but premium purpose-built studios are the optimal solution to meet identified demand.
- 12.135 **Accessible location:** Marlow is a very accessible location in transport terms, particularly to the US via London Heathrow, which is important. The Site is a short distance from Marlow, and around an hour from Charing Cross and the centre of London. Two new bus services are proposed as part of Marlow Film Studios, one between High Wycombe and Maidenhead and another between Marlow and Bourne End to offer easier and broader connections to the soon to open £18.8bn Elizabeth Line which will provide an entirely new way for both crew and the community to make journeys to central London and beyond in a much more efficient, frequent, and comfortable way. The Site is also accessible in terms of road and rail. The Public Right of Way through the Site, and Marlow Road to the north, provide additional access to the Site.
- 12.136 **Considerable economic benefits:** Marlow Film Studios would support significant socio-economic impacts locally. The studio would create an average of 2,550 construction jobs on-site throughout the construction period, up to an estimated 4,185 permanent direct and indirect new jobs and generate approximately £338m in GVA each year. The studio would support annual tax revenues of up to £105m, whilst increasing exports by up to a projected £102m annually and attract tourists. Marlow Film Studios could directly deliver up to 17% of Buckinghamshire's planned future jobs growth to 2030, helping to counter the net loss of 138,000sqm in B class employment floorspace in Wycombe between 2005 and 2017. Marlow Film Studios would also lead to economic stimulus for supporting industries through production expenditure. This is estimated at between £130m and £155m for businesses in the WLC per year.
- 12.137 **Social value:** Marlow Film Studios would positively impact skill levels in the area by providing educational-based services and programmes. The studio

¹²⁴ Lambert Smith Hampton, 2021. The UK & Ireland Film & TV Studio Property Market 2021.

is also committed to improving the overall amenity of the local area. For instance, bus transport and cycle access are set to be improved nearby. Pedestrian access will also be provided through the provision of walking routes on-site.

Conclusion – Very Special Circumstance 4

- 12.138 The National and Local strategies set out a clear and compelling need for the film and television industry to be accommodated within the UK, particularly the West London Cluster. The Economic Case sets out clearly the need for significant quantities of additional production space in the right places and the socio-economic factors driving the location of new film studio space at Marlow. It sets out the contribution that the West London Cluster can, and should, make (as implored by Local and National Industrial strategies) to meeting that need. The Economic Case clearly sets out the significance of Marlow within the cluster, the contribution that the unique offer at the Site can make and the clear benefits that will flow from the development.
- 12.139 The Sequential Assessment identifies the application Site as the best location in which to deliver a new studio that will meet the clearly identified need for studio space. It is also the sequentially most preferable Site to capture the benefits that would flow from such a development. Failure to build the new studio at Marlow will lead to a loss of those benefits, most notably the local and national economic benefits, which are covered in more detail in Very Special Circumstances 1, 2 and 3. Very Special Circumstance 4 represents a very special circumstance both in isolation and as part of a cumulative case and should be afforded substantial weight in the decision-making process.

13.0 Legal Agreements and Conditions

13.1 There are a number of requirements arising from Marlow Film Studios that need to be secured through a S106 Planning Obligation Agreement. These obligations include:

1) Transport

- a) Modal Shift Strategy – 60% target. S106 to secure the approach and mitigation.
- b) Monitor and Manage Strategy
 - a. Measure vehicle trips, mode share.
 - b. Trigger levels and timetable set out in S106
 - c. Mitigation measures set out in S106
- c) Public Bus Offer
 - a. Creation of two new public bus routes
 - i. High Wycombe station to Maidenhead station
 - ii. Marlow – Bourne End

To offer easier and broader connections to include reaching the soon to open £18.8bn Elizabeth Line. The studio workforce and crew will be actively encouraged to use these options when travelling to and from site.

- b. Creation of new public bus stops which serve the Mobility Hub at entrance
- c. Bus provision for Park Homes & Westhorpe House residents
- d. New bus access to RUR4 area & Athletics Track (via bus access to the Site/new routes)

Funding will be secured for an agreed number of years (amount/duration to be agreed as part of the application mitigation package and discussions)

- d) Pedestrians and Cyclists
 - a. Bike hub, bike rental and E-Scooter trials.
 - b. Financial contributions to Buckinghamshire Council for delivery of new and improved footpath routes through/off allocation RUR4 area.
 - c. Financial contributions to Buckinghamshire Council for them to deliver off-site cycle improvements, which could include a connection adjacent to A404 from Fieldhouse Lane to the Public Right of Way, to facilitate cycle access to the RUR4 area.
 - d. Provision of permissive pedestrian access to Plot 4.

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- e) Monitor & Manage Approach
 - a. Funding for:
 - Travel Plan
 - Travel Plan Coordinator
 - Site Surveys
 - Monitoring fees
 - b. On-Site Management Plan which occupiers are signed up to, including:
 - ANPR
 - Operator controls
 - Pre-booked crew arrival times and methods
 - Controlled Parking
 - c. Review of Sustainable Transport Strategy performance

2) Education, Skills and Employment

- a) Skills & Cultural Academy
 - a. Provision of 11,700sqft building dedicated to education and skills development programmes, to include defined periods of public access (as set out earlier)
 - b. Minimum number of years commitment to utilising this space primarily for education and culture
 - c. Owner to deliver the land, construction, and maintenance of building
- b) Engagement Programme
 - a. Develop and promote programmes for:
 - Primary & Secondary schools, including use of the Skills & Cultural Academy building.
 - Studio Camps minimum number of free places per annum for pupils in the local school catchment areas.
 - Focused engagement on schools that offer a greater social impact.
 - Engagement with existing creative centres.
 - b. Commitment to work with the Careers and Enterprise Company and support the Bucks Careers Hub.
 - c. Commitment to providing space for HE/FE Institutions and create a link between academia and industry.
 - d. Creation of a dedicated Task Force & Annual education summit.

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- c) Workforce & Economic Opportunities
 - a. Commit to and maintain a Local Screen supplier directory
 - b. Commit to open day training sessions & quarterly job fair
 - c. Commitment to promoting local jobs and opportunities in connection with Bucks Skills Hub
 - d. Local procurement strategy for construction phase of the development:
 - o Using local SMEs to tender for goods and services (including provision)
 - o Local contractors/sub-contractors
 - o Initiatives to overcome barriers to local SMEs in accessing the supply chain
 - d) Employment and Skills Support
 - a. Commitment to creating new trainees per annum, for an agreed number of years, with a target for 66% from local postcodes with a 40% or better weighting on DEI (diverse, equal, and inclusive) /Inclusivity candidates
 - b. Provision of a number of Bursaries for a committed period
 - c. Employment of a part time scheme co-ordinator to oversee the implementation and operation of the training and education programmes
 - d. Commitment to the creation of construction jobs and apprenticeships working with the CITB

3) Outdoor Recreation

- a) Plot 4
 - a. Land, construction and maintenance of Culture and Skills Academy Building
 - b. Access to Culture and Skills Academy building for education/training – becomes ‘quasi public’ in the same fashion as schools/higher education facilities
 - c. Guaranteed public access to Culture and Skills Academy building for a minimum number of days per year, but potential for further – e.g. potential use for community groups etc
 - d. Providing permissive access to Plot 4 (as is currently private land), with routes around Plot 4 – available for majority of the year (allowing for some closures for safeguarding etc reasons)
- b) RUR4 Wider Area
 - a. Financial contributions to deliver footpath/cycle connectivity (as set out earlier)

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- b. Access to car parking on weekends (minimum number per year) for community to access wider RUR4 area

4) Environmental Offer

- a) An on/off Site biodiversity net gain which achieves the emerging national requirement of 10%, and our own voluntary target of +20% net gain. The habitat provided will be covered by a 30 year conservation covenant and meet the standards of the coming statutory framework once passed into law.
- b) Response to community engagement:
 - a. Meeting costs of Bucks, Berks & Oxon Wildlife Trust (BBOWT) Audit of Biodiversity Net Gain.
 - b. Additional grant-aid to local farmers to boost songbird population
 - c. Additional grant-aid to local landowners to boost wildflowers & pollinators
- c) Sustainability Pledge (Condition/S106)
 - a. BREEAM – Very Good or Excellent rating for key buildings on the Site
 - b. 105% savings in CO2 provisions through secured use of PVs, energy efficient buildings and air source heat pumps
 - c. Annual ESG Impact Reporting for an agreed period
 - o Rounds up Sustainability, Carbon AQ Progress

5) Local Community Offer

- a) Near Neighbours Programme
 - a. “Megaphone” – community engagement and liaison platform
 - b. Priority tickets to cultural programme
 - c. Pastoral Care programme – Park Homes to have opportunity and access to pastoral care programme (matched with crew and trainees)
- b) Community Hall
 - a. Land, construction, and maintenance
 - b. Meets identified deficiency in area (identified in Wycombe Community Facilities Strategy Update)
- c) Bus passes for Park Homes residents
- d) Enhanced security for Park Homes (new secure barrier)

6) Other Benefits

- a) Further potential propositions (not all S106 but wider benefits)

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- a. Air Quality – in line with a wider Marlow Town Council ambition, funding will be provided for dual purpose EV charging and Air Quality Monitoring stations in Marlow. This funding pot will also be available elsewhere locally.
 - b. S278 works – signalling junction, off-site highways etc will have wider benefits
 - c. Mobility interchange will encourage active travel and connect into wider area aspirations

13.2 All requirements must accord with the Community Infrastructure Levy (CIL) Regulations 2010. Regulation 122 places into law the Governments policy tests on the use of planning obligations, namely:

- a. Necessary to make the development acceptable in planning terms
- b. Directly related to the development
- c. Fairly and reasonably related in scale and kind to the development.

13.3 The contributions sought are considered to comply with the Regulation 122 tests.

14.0 The Planning Balance and Conclusion

- 14.1 This section considers the overall planning balance.
- 14.2 The application is required to be determined in accordance with the Development Plan unless material considerations indicate otherwise. As demonstrated within Sections 9.0 and 10.0 Marlow Film Studios achieves compliance with many areas of the Development Plan. Indeed, in many respects it exceeds the provisions of the Development Plan. Nevertheless, when read as a whole, Marlow Film Studios does not accord with the Development Plan due to its conflict with Green Belt policy and Policy RUR4.
- 14.3 There is no prescribed formula for making the necessary judgements on harm and other considerations and their relative weight. The issue of balance is for the decision-maker. The weighing and balancing decisions must be properly explained and justified.

Green Belt Harms

- 14.4 The Green Belt assessment (consideration against purposes, aims and overall assessment of harm) is addressed in full at paragraphs 12.1 and 12.73 of this Statement. It is demonstrated that the Proposed Development would:
- constitute inappropriate development and is, by definition, harmful to the Green Belt.
 - give rise to a loss of openness and moderate harm in respect of Green Belt purposes ‘a’¹²⁵ and ‘b’¹²⁶ and moderate/low harm in respect of purpose ‘c’¹²⁷.
 - contribute to the aims of providing access, opportunities for outdoor recreation and improvements in biodiversity (emerging national requirement of 10%, and our own voluntary target of +20% net gain) and present an opportunity to improve damaged land. However, it is acknowledged that it would have an adverse impact on the landscape and visual amenity, albeit this was, to a degree, managed and mitigated by the design approach.
- 14.5 Substantial weight should be attached to the harm (including definitional/policy harm) that has been identified.

Other Harms

- 14.6 In the Development Management assessment above (Sections 9 and 10) confirms that the development is technically acceptable although residual

¹²⁵ To check the unrestricted sprawl of large built-up areas.

¹²⁶ To prevent neighbouring towns merging into one another.

¹²⁷ To assist in safeguarding the countryside from encroachment.

harms do occur to: landscape character, the setting of a listed building and conflict with policy RUR4.

- 14.7 The landscape impact is judged to be medium and of moderate adverse significance over the medium to long term. This is principally due to the scale of the development and therefore magnitude of the impact rather than the sensitivity of the landscape.
- 14.8 Marlow Film Studios is considered to lead to moderate adverse harm to the significance of Corner Cottage and Westhorpe House.
- 14.9 Marlow Film Studios will be in conflict with policy RUR4. However, this conflict is given very limited weight due the undeliverability of this aspirational policy given the fragmented ownership and in the absence of an incentive to the landowner. The delivery of recreational space on Plot4, which is only possible due to the development, sits as a benefit.
- 14.10 These harms are overall weighted as minor to moderate for decision-making.
- 14.11 It is recognised that there are other minor harms in respect of temporary harms to ecology, increase in traffic, impact on amenity, impact on air quality, lighting, and noise/vibration, but these are all considered to fall within acceptable limits or are capable of being mitigated such that they have negligible planning impacts. Therefore, they do not materially tip the balance of decision making and can be considered to have a neutral impact in the planning balance.

Other Material Considerations – Positive Impacts and Benefits

- 14.12 There are a range of positive impacts, benefits and factors that are to be weighed against the harms identified above. The main factors are the very special circumstances. These are summarised below and addressed in full in Section 12 at paras. 12.47 to 12.139:
- **Very Special Circumstance 1 – Socio-Economic Benefits – to the national and local economy.**
 - **Very Special Circumstance 2 – Meeting the need for film and television facilities.**
 - **Very Special Circumstance 3 – Meeting local and national government policy.**
 - **Very Special Circumstance 4 – The geographically fixed location – there is no sequentially more preferable site.**
- 14.13 It is considered that the very special circumstances in isolation substantially outweigh the harm to the Green Belt by reason of inappropriateness, and any other harm (i.e. landscape and listed building harm), thereby justifying the grant of planning permission.
- 14.14 However, it is considered that many other benefits would also flow from the development, which when taken in isolation do not amount to very special circumstances, but when taken cumulatively further weigh in favour of the

grant of planning permission. These additional benefits can be broadly grouped under the headings ‘community’ and ‘environmental’ benefits and are set out in more detail below:

Community Benefits

- 14.15 The provision of 2.8 ha of public open space on Plot 4 for the recreational uses to kick start the Council’s policy aspiration for a recreational space in accordance with policy RUR4. This should be afforded significant weight.
- 14.16 The provision of two new buildings for community use:
- A 147 sqm (GEA) new community building in Plot 2a for use by local residents.
 - A 979 sqm (GEA) cultural, educational, and recreational building in Plot 4. This building is proposed to be a multi-use building, which will be mostly utilised for educational purposes during the day and community environmental and recreational uses at other times. It will also provide a hub for occasional community cultural events in connection with the recreational use of Plot 4.

These buildings will provide important new community assets in an area of identified need and therefore should be afforded **significant weight**.

Environmental Benefits

- 14.17 The design quality (including built form and approach to landscaping) when taken within the context of the Site and benchmarked against the quality of commercial developments generally (inc. film studios) and existing commercial developments in the local area, the design is outstanding. The delivery of this Site will serve to help raise the standard of design more generally in the area. Therefore, in line with paragraph 134 of the Framework the design quality of the scheme should be afforded **significant weight** in the decision-making process.
- 14.18 The Council’s canopy cover policy requires developments to deliver 25% canopy cover. Marlow Film Studios delivers 32% canopy cover including significant areas of green roof. The figure would be still higher if the improved grasslands were credited as canopy cover. 25% canopy cover is a planning benefit of some weight, the provision of 32% canopy cover, which exceeds the policy requirement is considered to attract **significant weight**.
- 14.19 The scheme will be designed to be highly energy efficient. It will: exceed building fabric performance levels for Building Regulations 2021; use air source heat pumps to provide heating, cooling, and hot water; and, will provide solar arrays on all sound stages and car parks generating c.3,479,598 kWh/year. The scheme will deliver 105% saving in regulated CO₂ emissions. These sustainability measures, which are an integral aspect of the design, and far exceed minimum policy requirements, should be afforded **significant weight** in line with para. 134 of the Framework. They will help raise the quality of sustainability in the area more generally.

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- 14.20 The scheme has been developed to target a BREEAM very good or excellent for key buildings on the Site. This will ensure a minimum standard for: management; health and well-being; energy; transport; water; materials; waste; land use and ecology; pollution; and innovation. This exceeds any Local Plan requirements and therefore should be afforded **significant weight**.
- 14.21 Marlow Film Studios is to achieve an on/off Site biodiversity net gain which achieves the emerging national requirement of 10%, and our own voluntary target of +20% net gain. The habitat provided will be covered by a 30 year conservation covenant and meet the standards of the coming statutory framework once passed into law. The delivery of a 10% Biodiversity Net Gain, which exceeds the current policy requirement, would attract significant weight. In the event 20% can be achieved this would also attract **significant weight** but set against a greater magnitude of benefit. Whilst the precise figure cannot currently be confirmed, this will be confirmed prior to determination so that fully taken into account.
- 14.22 A commitment to deliver a 60:40 mode share with 40% using alternatives to the private car. This will be backup with a 'Mode Share Incentive Scheme' monitor and manage approach. The STS will include a number of on-site measures and two new bus services. One between High Wycombe and Maidenhead (providing a good quality link to the Elizabeth Line) and the other between Bourne End and Marlow. Both will stop at the Site. These new bus services will serve the development and be open to the general public. The provision of these bus services is considered to represent significant public benefits and should be afforded **significant weight** accordingly.
- 14.23 Upgrades to the existing Public Right of Way that traverses east/west across the Site and upgrades to the off-site footpath and cycle route network. These attract **significant weight**.
- 14.24 The very special circumstances (set out in full in Section 12 of this Statement) when taken in isolation are considered to clearly outweigh the harm to the Green Belt by reason of inappropriateness, and any other harm. The community and environmental benefits set out above (singly and cumulatively) further (and substantially) tip the balance of decision making in favour of the grant of planning permission.

The Overall Planning Balance

- 14.25 Marlow Film Studios is in conflict with the development plan¹²⁸ when read as a whole. However, there are very weighty considerations that indicate that it should be determined otherwise than in accordance with the plan, including that it would not give rise to adverse impacts which significantly and demonstrably outweigh the benefits when assessed against the Framework as a whole.

¹²⁸ Note: the Development Plan pre-dates Covid and the subsequent economic shocks.

14.26 This Statement demonstrates that there are considerations, which individually and cumulatively, outweigh by a considerable margin, the harm arising from Marlow Film Studios. As such, very special circumstances exist so as to both override conflict with the Development Plan and justify a grant of planning permission for inappropriate development in the Green Belt.

Appendix 1 – Planning History

Appendix 2 – Development Plan policies

Appendix 3 – Design South East – Design Review Panel Reports

Appendix 4 – Drawing Schedule

Appendix 5 – Critical Mass

Appendix 6 – British Film Commission – Drive Time Analysis



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