

[REDACTED]

From: Alan Divall [REDACTED]
Sent: 25 July 2022 07:04
To: Planning Wycombe <planning.wyc@buckinghamshire.gov.uk>

[REDACTED]

Subject: [EXTERNAL] FW: Planning Application Reference: 22/06443/FULEA: At Land Adjacent South Side Marlow Road and A404 Junction, Westhorpe Park, Little Marlow, Buckinghamshire

[REDACTED]

Good morning

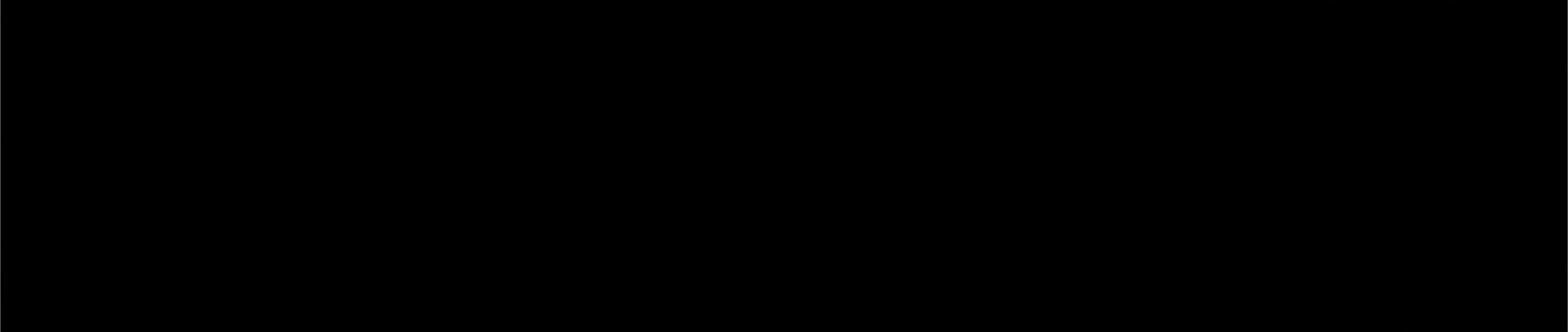
I received a bounce back to the Wycombe Planning email address so sending again.

Please acknowledge safe receipt.

I look forward to hearing.

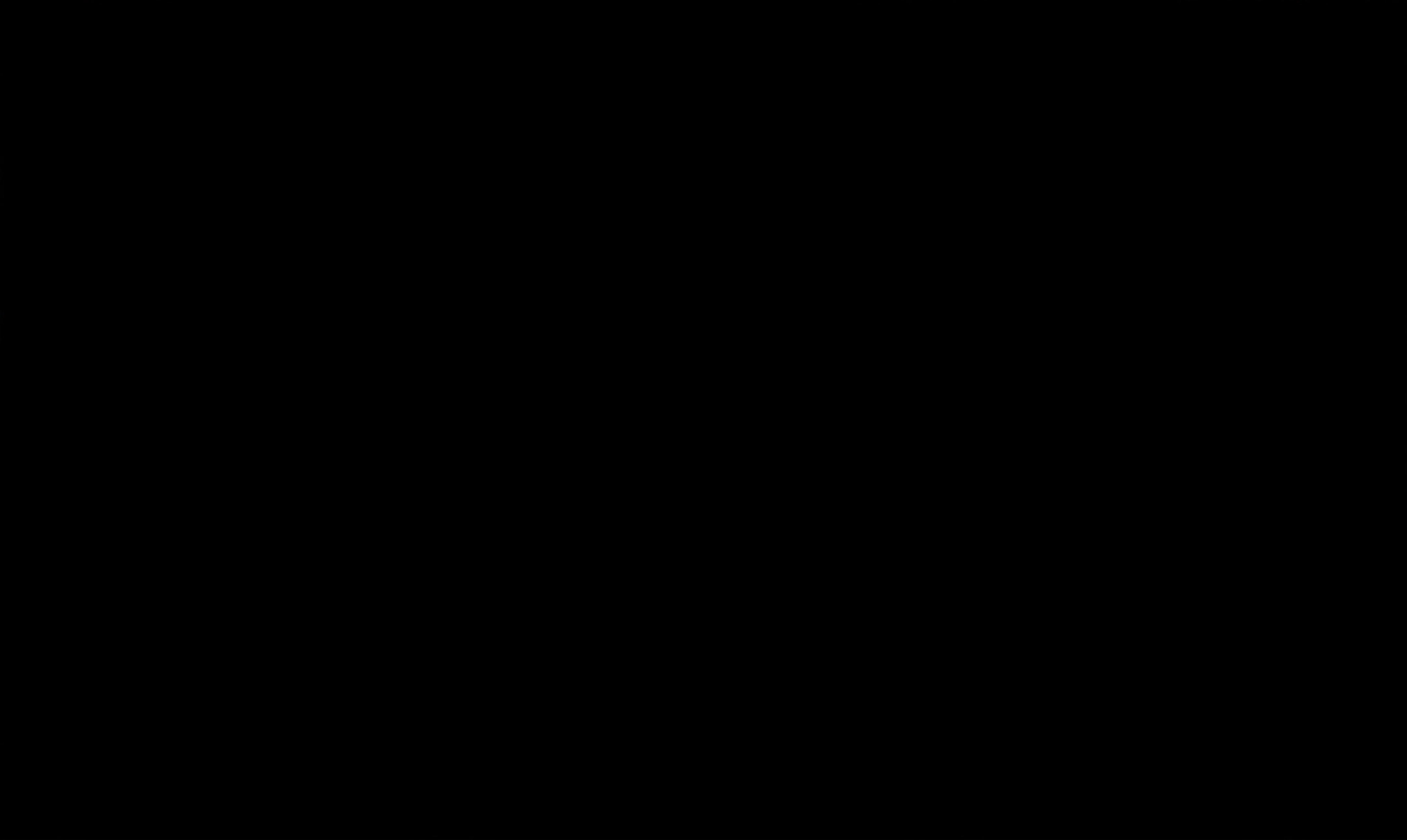
Many thanks and kind regards
Alan

[REDACTED]



Forwarding as requested by Emma's out of office.

Many thanks and kind regards
Alan



Dear Emma

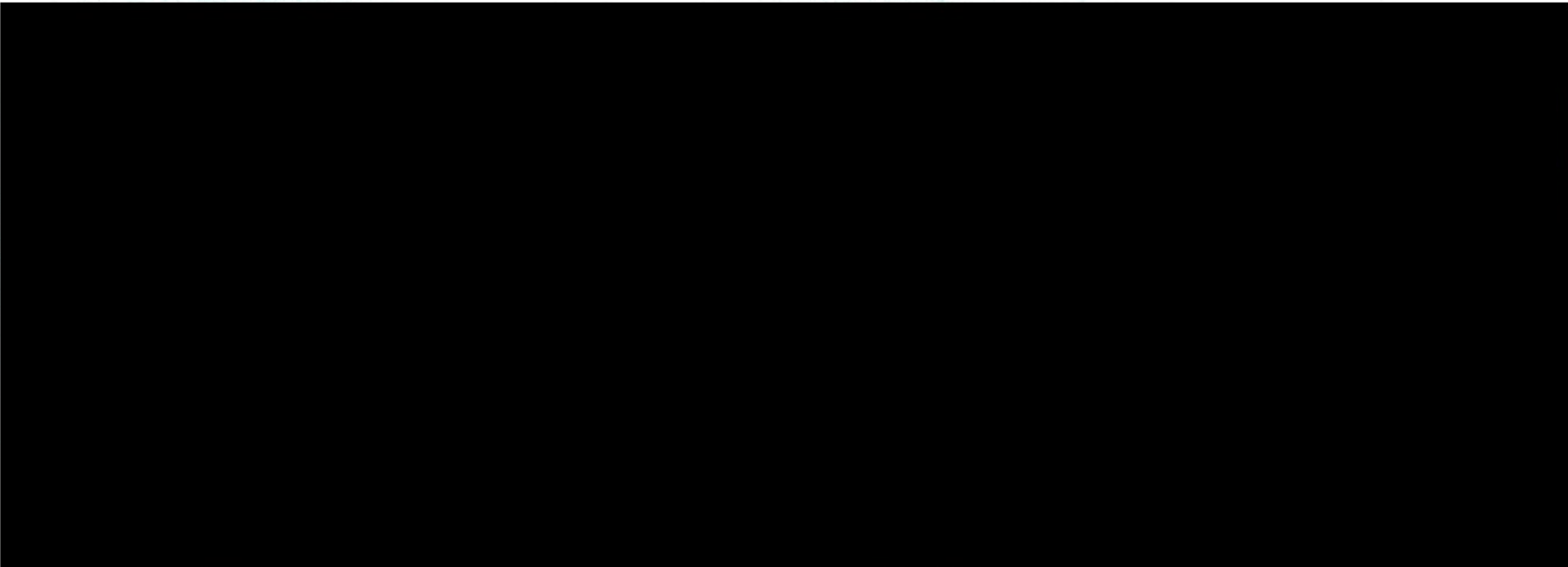
Please see attached my client's objections to the above planning application.

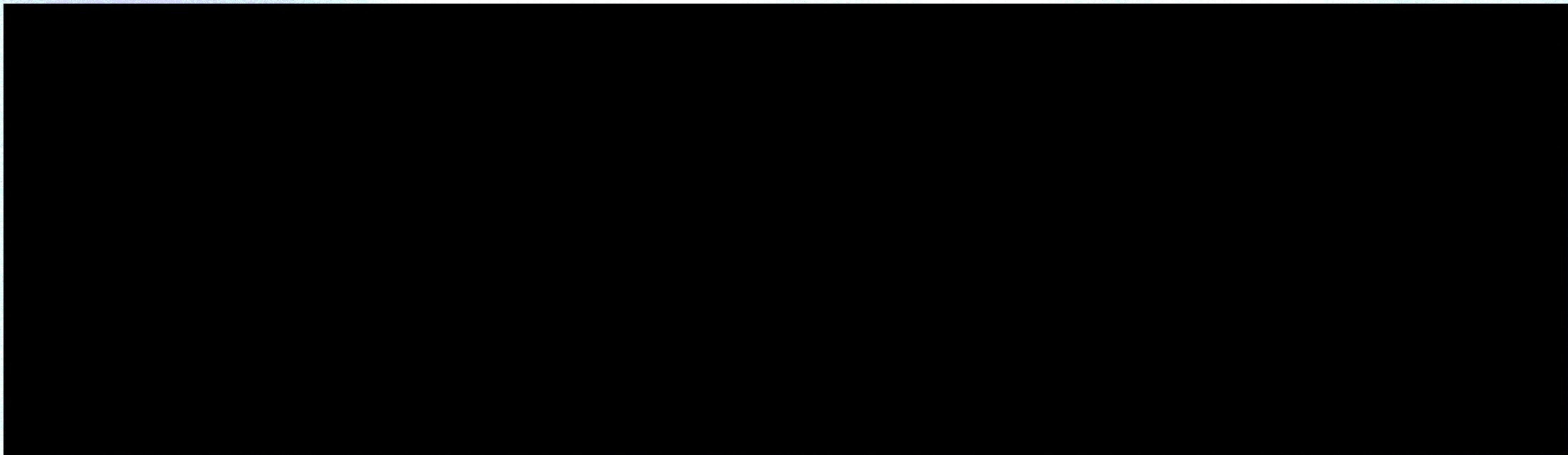
My client will be making further representations in due course.

I would be grateful if you could confirm safe receipt.

If you have any questions please contact me.

Many thanks and kind regards
Alan







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Ref: AD//B0159/22

23rd July 2022

Bourne House, Cores End Road
Bourne End, Bucks, SL8 5AR

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Email: bourne.end@walsingplan.co.uk

Web: www.walsinghamplanning.co.uk

Ms Emma Crotty
Principal Development Management Officer
Planning, Growth and Sustainability
Buckinghamshire Council

Sent by email only

Dear Ms Crotty

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

At Land Adjacent South Side Marlow Road and A404 Junction, Westhorpe Park, Little Marlow, Buckinghamshire

Planning Application Reference: 22/06443/FULEA

I submit objections to the above application on behalf of my client Save Marlow's Green Belt (SMG).

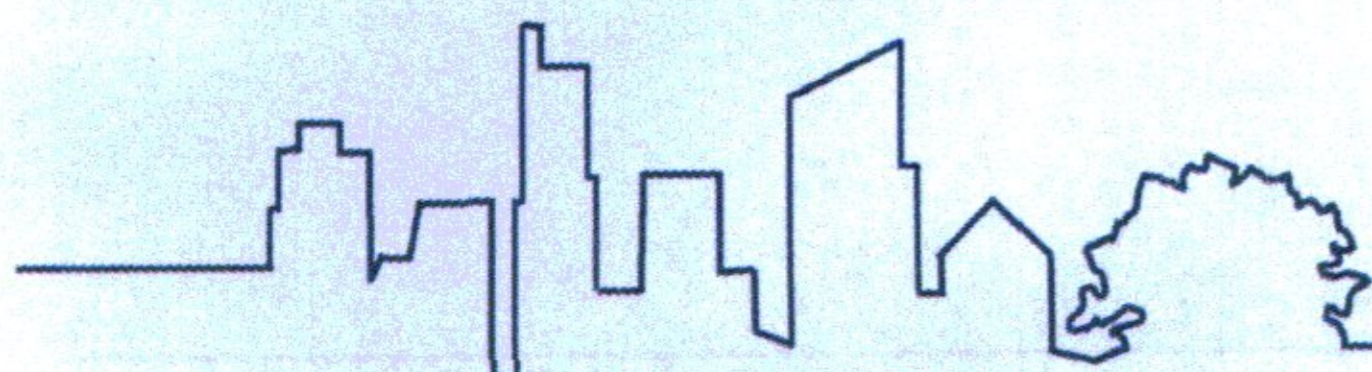
This application is a major development proposal in the Green Belt and contrary to the adopted Development Plan for the former Wycombe District Area of the now Buckinghamshire Unitary Authority.

This application raises significant local, regional and national impacts.

The application falls within the requirements of the Environmental Impact Assessment (EIA) Regulations and is supported by an Environmental Statement.

The application submission is significant and contains more than 200 standalone documents. For the reasons set out above, the application is technical and not easily understandable to those unfamiliar with the planning process and the complexities associated with development falling under EIA Regulations and within the Green Belt.

My client, like many other concerned local residents and organisations, requires technical support to review the submitted information and fully understand the significant implications of this proposal.



This letter therefore sets out key matters that form the SMG's objection to this application. Further representations will be submitted by SMG prior to this application being determined by Planning Committee and once this full technical assessment has been undertaken by their consultant team.

This letter has been compiled following SMG's attendance at the extraordinary meeting of Little Marlow Parish Council on the 19th July 2022. At this meeting the applicant and their representatives presented the application proposals and SMG and other residents and interested parties asked questions. This letter responds to a number of matters that were raised at this meeting.

My client's objections relate to the following matters:

General Matters

The applicant claims that there is local support for the proposal. This is not evident from the significant number of objections that have now been submitted against the application and the opposition at the Little Marlow Parish Council meeting on the 19th July.

SMG, alongside many other respondents are concerned with regards to the consultation that has been undertaken with local school children and whether the proposals have been presented to this audience in a balanced way.

Development within the Green Belt

The applicant relies on the economic benefits that this proposal will bring as their 'very special circumstances' for bringing forward inappropriate development in the Green Belt.

These economic arguments provided by the applicant do not demonstrate very special circumstances and SMG will provide a detailed response to the evidence presented within the application in due course.

The applicant relies heavily on an argument that other existing film studio sites have been granted planning permission and therefore set a precedent within the Green Belt for this proposal. These sites have no relevance to this proposal given that they are existing, long-established and previously developed sites within the Green Belt. This proposal is the establishment of a new site on greenfield land and within the Green Belt.

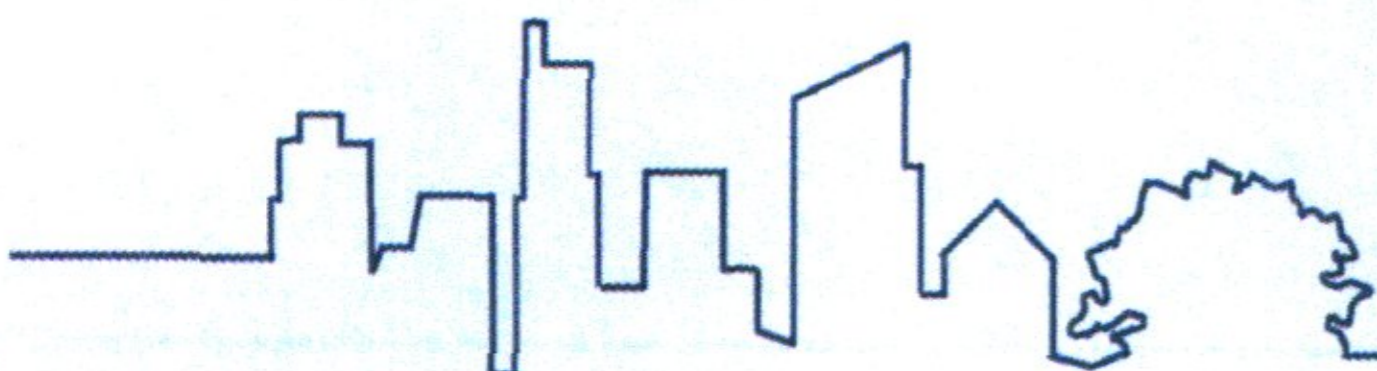
The applicant's alternative site assessment is fundamentally flawed in that it identifies this site as the most suitable for the only reason being that it is in the ownership of the applicant.

The proposals cause significant harm to the purposes of including land within the Green Belt that are not outweighed by the claimed very special circumstances.

SMG's objections in relation to Green Belt matters will be expanded upon in due course.

The Adopted Wycombe Local Plan

The proposal is contrary to and a departure from the adopted Wycombe Local Plan.



Paragraph 10.7 of the applicant's Planning Statement seems to suggest the adopted Wycombe Local Plan allows for the release of non-allocated Green Belt sites to meet demand for employment development. This is fundamentally incorrect.

The Government places significant priority on a Development Plan led system. The review of the adopted Wycombe Local Plan is now underway with the production of the Buckinghamshire Local Plan 2050. The applicant has provided no reasoning or explanation as to why this site is not being promoted through the new Bucks Local Plan review process. A proposal of this scale and of this significance should be considered through the Local Plan review process. The claimed matters of strategic importance associated with this proposal should only be considered through the Local Plan review process.

It is not correct to state, as the applicant's agents did at the Little Marlow Parish Council meeting, that the local community will have more 'control' of the proposal through a speculative planning application than the Local Plan review process. The identification and allocation of sites, including the release of sites from the Green Belt, is undertaken following detailed scrutiny by both the Local Planning Authority and the Planning Inspectorate. A site allocated for a particular land use within a Local Plan can only be brought forward in accordance with the use contained within the associated Plan policy. It could not be brought forward for other uses such as residential and therefore to suggest that the planning application provides more certainty or control for the local community is not justified.

The site is located within the Little Marlow Lakes Country Park as allocated by Policy RUR4 of the adopted Wycombe Local Plan.

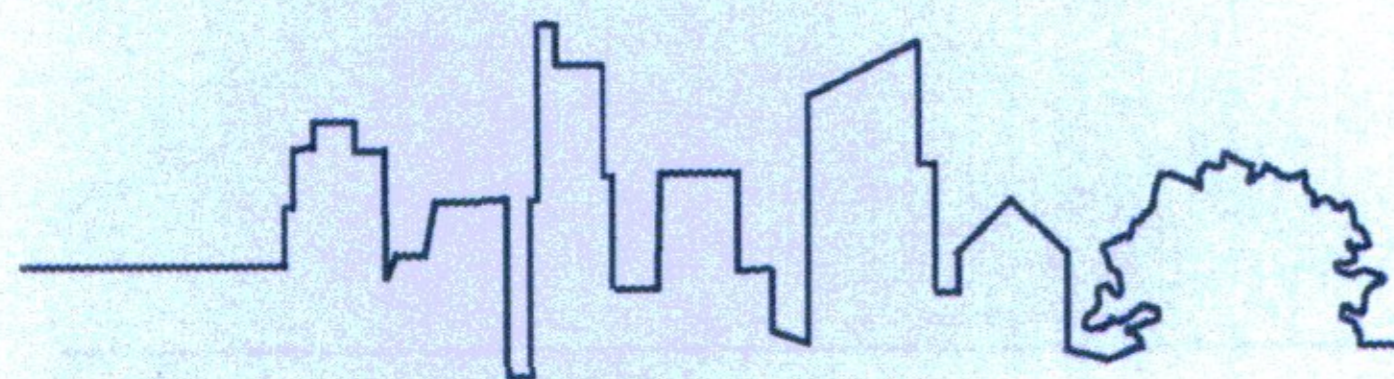
The applicant makes various assertions that the Country Park will not be delivered because of matters associated with landownership. This includes reference to a Buckinghamshire Cabinet meeting on the 1 March 2022 – page 82 footnote 54 of the applicant's Planning Statement.

The applicant fails to provide the full picture with regards to the question raised by Councillor Stuart Wilson and the response from Councillor Chilver on behalf of 3 Cabinet Members. The response provided by Councillor Chilver¹ confirmed that in order to provide mitigation for the Hollands Farm development at Little Marlow Country Park there is no requirement for additional land to be provided. The application as currently submitted will mean that the Hollands Farm application cannot provide its required mitigation to recreational impacts. This is supported in Natural England's letter of objection to the application dated 13th July 2022.

The response provided by Councillor Chilver goes on to confirm that a full update report on the Little Marlow Lakes Country Park will be reported to Buckinghamshire's Cabinet in due course. This report has yet to be seen by the applicant and therefore the assertions that they make with regards to the status of the Country Park have no substance.

This is reinforced by the fact that the Wycombe Local Plan remains part of the adopted Development Plan for this area of Buckinghamshire (which the applicant agrees to – see paragraph 8.5 of their Planning Statement) and full weight is afforded to its policies – including policy RUR4. The applicant provides no evidence as to why policy RUR4 of the adopted Local Plan is out of date or should be simply set aside in order to justify their speculative planning application.

¹ <https://buckinghamshire.moderngov.co.uk/mgAi.aspx?ID=11957>



SMG's objections in relation to Local Plan matters will be expanded upon in due course.

Visual Amenity

The applicant has failed to consider the impact of the proposals on the setting of the Chilterns Area of Outstanding Natural Beauty. This is confirmed within the objection from the Chilterns Conservation Board dated 12th July 2022 and relates to three key reasons:

1. The visual setting impact of the AONB, including impact when viewed from Winter Hill;
2. Landscape erosion of the RUR4 Country Park and its impact on the AONB;
3. Failure to comply with the very special circumstances test in the Green Belt due to the material erosion of the rural landscape and the consequential impact on the setting of the AONB.

The above matters are serious failings of the application and result in harm that the current proposals cannot mitigate against.

SMG's objections in relation to Visual Amenity matters will be expanded upon in due course.

Traffic and Transport

Objections are raised for two fundamental reasons:

- a) The significant capacity issues with the Westthorpe A404/A4155 interchange which this development cannot and will not mitigate and will only exacerbate;
- b) The location of this development is in an inherently unsustainable location with poor existing public transport provision and the proposed bus services will not deliver the suggested modal shift to employees and visitors using public transport.

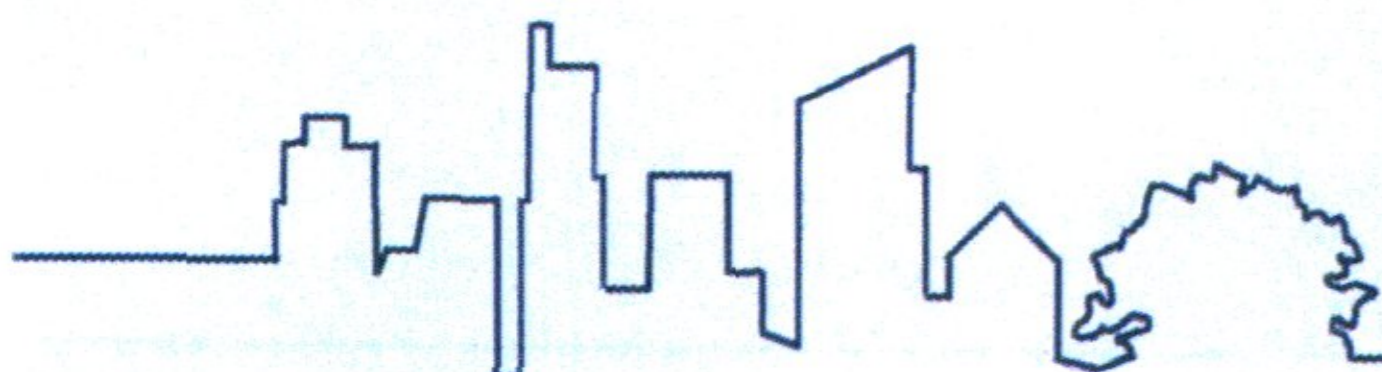
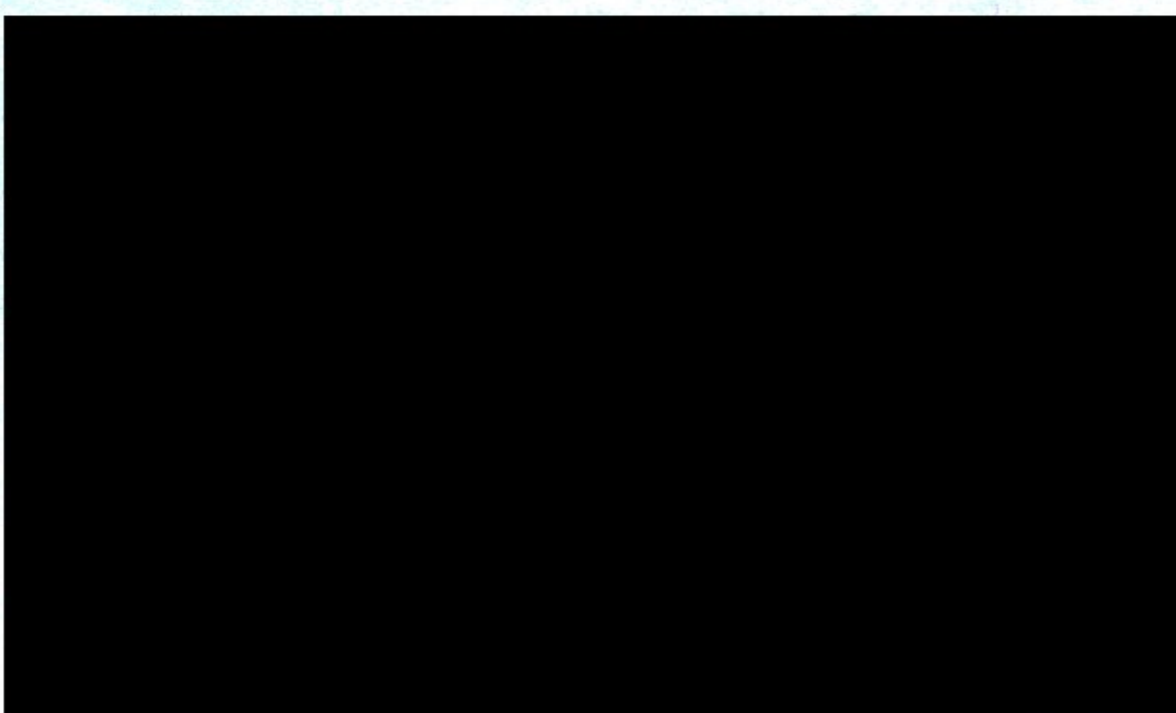
The applicant continues to assert that the proposed bus service will be a 'benefit' to local residents, and this is something that has been asked for. This is incorrect. The proposed bus service is only being provided by the applicant to try and mitigate their development. It cannot therefore be considered to be a benefit that has been requested by the local community and provided by the applicant.

SMG will present further detailed comments in relation to Highways and Traffic matters in due course.

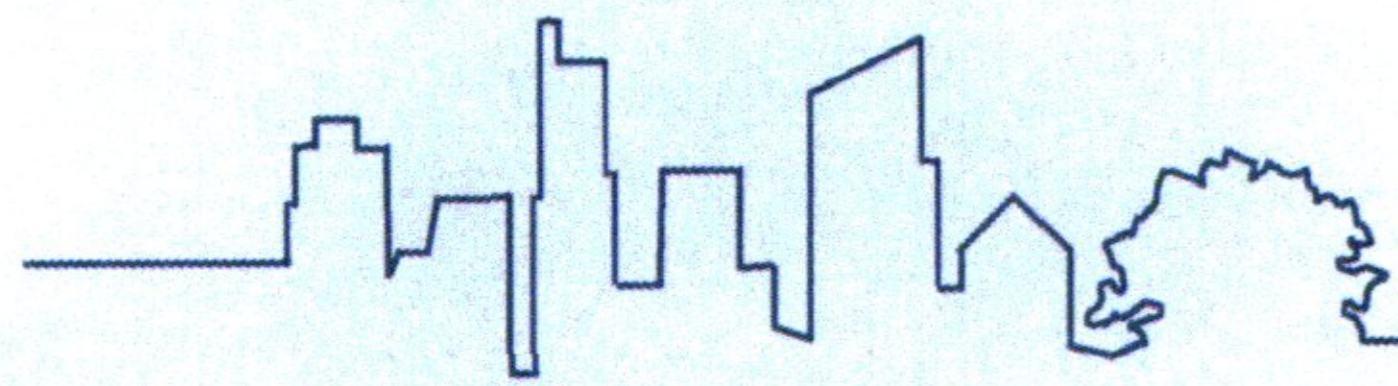
My client thanks Buckinghamshire Council for the opportunity to submit these comments and further representations will be submitted shortly.

If you have any questions, please contact me.

Yours sincerely



Alan Divall BA (Hons) MRTPI
Director



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