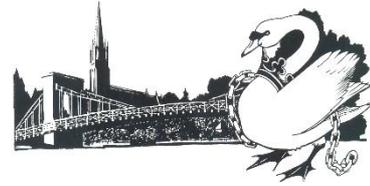


# THE MARLOW SOCIETY



**The Marlow Society *objects* to the planning proposal (22/O6443/FULEA) by Dido Property Limited (DPL) on the grounds of its impact on Marlow and surrounding area with no significant local economic or social gain.**

The Society has over 600 members who have been consulted on the proposed development. Our objections and comments have been guided by the responses and are categorized under the following headings treated below:

- 1. Lack of rationale to overturn the Green Belt designation**
- 2. Siting**
- 3. Heritage**
- 4. Transport**
- 5. Environment**
- 6. Impact on the Country Park**

We have been given only thirty days to look at over four-hundred documents many running to tens of pages. Given the complexity of issues and analysis of detail that is required, this is insufficient time.

The DPL community engagement summary is very misleading. Although we do not specifically object to it, a few examples will demonstrate our view.

The Community Liaison Group online meetings were held to DPL's constrained agenda - predominantly presentations on its own economic and social justification and its building design proposals. Discussion of contrary views was suppressed. The central planning issues of harm to the local Green Belt and to the Little Marlow Lakes Country Park were not discussed in any depth.

## **1. Lack of rationale to overturn the Green Belt designation**

**The proposal asks to build in an area bordering the Chilterns AONB, on designated Green Belt, in a Country Park recognised by the 2019 Local Plan. This development is inappropriate, even considering the applicant's 'very special circumstances', and the application should be dismissed.**

### **'Very Special Circumstances'**

The developer claims four reasons to overturn the Green Belt, which are considered in turn in the bullet points below:

### ***Significant socio-economic benefits nationally***

Any claimed production or creative skills would equally benefit areas more in need of support than in the South East and development here will increase the disparity across the country.

Staff already cannot be recruited by businesses in the West London and Buckinghamshire areas. Recruitment for this studio will cause damage to existing businesses and require people to move from other parts of the UK.

The industry is supported by tax breaks. The DPL business model would be particularly vulnerable to changes of tax or incentive policy.

DPL is an offshore property company

- not a film studio company, unlike most of the nearby sites
- set up to minimise tax, thereby reducing the benefit to the UK economy

### ***Current pressing need for studio space***

Growth rates in demand for studio output are unrealistic. Netflix and Amazon Prime are cutting costs and so is the demand for studio space. The applicant quotes a 30% growth rate, but very recent financial analysts' reports expect 9%. The pandemic level of demand is now over.

### ***Weight of national and local government policy encouraging this form of development***

There is no great weight of government policy favouring the Marlow location.

Employment levels in the South East are 79% - higher in the Wycombe/West London area. Unemployed level is below 3%. This compares to the North West and Yorkshire where the comparative figures are 73.5% and 4.5% respectively (Ref ONS statistics)

### ***Scarcity of land within the select west London film studio cluster (WLC)***

The planning statements refer to the potential customer requirements and why the WLC stands out:

- airport access (citing Heathrow)
- culture that fosters production talent
- access to film and HETV construction crews
- internet connectivity

Other sites such as Manchester and Leeds in the UK can meet these requirements. Both are served by Manchester International Airport meet the other requirements. Travel can be made via HS2. Both have excellent connectivity. There will be more brown-site land available. Both locations demonstrate industry expertise.

In the time available it has not been possible to examine the above factors in detail. A full independent analysis into the economics, both local and national, and a thorough examination of the location rationale is required.

## **2 Siting**

**The scale of the proposed development would change the character of the area. The DPL site is double the combined size of the existing Marlow industrial and business parks (ref. Wycombe Area Local Plan, Policy Map 9). Around 2,700 employees are anticipated, compared to Marlow's 14,000 population.**

**The Green Belt separating Marlow from Little Marlow and Bourne End would be eroded. Approval would renege on the undertakings made when the Hollands Farm development was approved. Recreation by local people and visitors would be significantly curtailed.**

### ***Appearance***

The *Design & Access Statement* (Section 5.3 Wider Landscape) accurately describes the situation:

*'The site sits within the Thames Floodplain Landscape Character Area identified within the Wycombe District Landscape Character Assessment. It is visible from the adjacent Thames Valley Slopes Character Area to the north. The Thames Floodplain Landscape Character Area is not equivalent to a flood zone, and therefore, this Landscape Character Area presents different flood risk areas within it.*

*It is also adjacent to the Winter Hill and Cookham Landscape Character Areas identified within the Royal Borough of Windsor and Maidenhead (RBWM) Landscape Character Assessment. The development will be visible from Winter Hill, and the character of this area has been considered in the development of the site masterplan.'*

As is described, the studio will dominate the landscape for miles around. The 36 hectares will be tightly filled with buildings up to 22m high.

The development would be highly visible from Marlow, Bourne End and Flackwell Heath and will ruin the views from Winter Hill, Bloom Wood and from the Chilterns AONB adjacent to the north. The photo simulations of the proposed visual effects are grossly misleading.

Pinewood studio, built for the same purposes, is basically a collection of large unsightly sound stages. The effect would be heightened at the Marlow site where the built structure will contrast starkly with the natural beauty that surrounds it.

### ***Contiguous Development***

Hollands Farm, a 23.74-acre former Green Belt site, has been earmarked for around 400 homes, a new primary school and a link road between Hedsor Road and Princes Road. This inevitably reduces the separate identities of Wooburn and Bourne End and will reduce neighbouring residents' access to green space.

Hollands Farm was approved with the understanding that the Country Park would mitigate for the loss of green space; a mitigation supported by Natural England. The MFS development would not only further erode the corridor of Green Belt, but would renege on this undertaking.

### ***Character of the Area***

*'The design will reinforce local character and enhance landscape setting.'* (*Design & Access Statement*, Section 5.3 Wider Landscape)

Quality of life for those living near to the site will be catastrophically affected. What is currently a very peaceful rural setting will be transformed into an industrial zone with increased levels of light, noise, atmospheric pollution, and flooding.

Sewage treatment at the Little Marlow works can barely cope at present evidenced by frequent direct discharges into the Thames over the years.

Traffic is predicted to significantly increase. This will make daily life for residents intolerable, increase air pollution and reduce Marlow's traditional attractions as a tourist destination.

Ready access to the countryside for residents in the east of Marlow will be lost forever as part of the Country Park becomes an industrial estate.

### **Ground Conditions**

*'The site is adjacent to the river Thames (main river) and the Westhorpe water course. The majority of the development is located in Flood Zone 1, with a low probability of flooding. However, some parts of the site fall within Flood Zones 2 & 3, with a medium and high probability of flooding.'*

MFS is to be built on the floodplain. Marlow has experienced extensive flooding in the past decade and groundwater levels are rising each year. Almost £10M has already been spent on the problem but more work is required. The 'Newt Ditch' alleviation scheme planned for East Marlow may be jeopardised by the proposed development.

### **Community access**

The proposal ignores and understates the impact on informal the rural footpaths and cycleways which have become established over more than 20 years. These ways have been largely ignored by the site's former landowners, who were content to see this post-extraction restored land laid waste while seeking to strengthen the land's 'brownfield' development potential.

The proposed 'improvements' offered by way of mitigation focus principally on highly controlled access to the site's film making locations and ignore this existing casual use which relies on the area remaining undeveloped and part of the Green Belt and Country Park, as envisaged the 2002 SPG recommendations.

The loss of and changes to this amenity during and after construction work will significantly reduce the benefit to current users' wellbeing and general health.

Walkers will be trapped inside an industrial development preventing them from enjoying that entire area and down to the river Thames. The development would undermine the basic zonal structure for the development of the Country Park set out in the *Masterplan* (fig 9) of the 2002 SPG.

## **3 Heritage**

**The aims of the 2002 SPG that the north-west corner of the RUR4 area could 'provide a quality landscape setting for the entrance to the Country Park and Westhorpe House' has been ignored.**

There are three *listed* heritage assets: Westhorpe House; Corners Cottage; Little Marlow Conservation area

and two *unlisted* assets: Former parkland of Westhorpe House; Site of WW2 POW camp north of the house

The comments in the planning application belittle the significance of these assets. For example, 'Little Marlow is a pleasant village with notable Georgian and Victorian properties, wedged between a busy A-road and a sewage works'. What happened to the medieval church and the 16<sup>th</sup> century manor house?

Westhorpe House it is described as a rather ordinary Queen Anne house with Victorian additions, which was listed in 1955. The more recent restoration and change of use has been sympathetic to its listing. The report implies that much material has been replaced and possibly altered but in fact the work has been consistent with the parkland restoration proposed in the 2002 SPG.

The DPS proposals would totally destroy the concept of parkland restoration and leave Westhorpe House and the adjacent Westhorpe Park Homes estate surrounded by industrial development and alongside a multi-story carpark, a highly retrograde step.

The other heritage assets are similarly belittled.

#### **4 Transport**

**The development plans fly in the face of what is contained in the National Planning Policy Framework and how that delivers the promotion of sustainable transport**

**This development relies on a large number of factors coming to fruition in order for it to be built:**

##### ***Completion of the rebuilding of the Westhorpe Interchange***

to create a dedicated northbound slip exit to Globe Park and new parapets to the north of the roundabout to allow safe cycle and footpaths (with traffic lights at the top of the north side slip roads). The Transport Assessment notes that this has to be completed by 2027 to keep traffic moving.

##### ***Redevelopment of the A4155 to the north of the site to create a signalled crossroads***

This will entail the road being widened (up to five lanes in one point) to enable north side cycle and footpaths and the creation of a dedicated "turn left" going west bound to enter the Studio entrance. Again, this has to be complete before the studios start operating.

##### ***Additional bus services***

We see that two bus services (Maidenhead station – Film Studios – Wycombe station and Marlow – Film Studios – Bourne End) have been promised. There is no mention, however how these will be funded and who will operate them.

##### ***Capacity issues***

The Westhorpe junction of the A404 and the A4155 already operates near to capacity at rush hours. Nearly 10000 vehicles are coming through there, contributing to a very poor air quality. This was recently confirmed in an Air Quality Management Area study. It should be noted that this study found poor air quality but was conducted during a partial COVID lockdown, so does not measure the true day to day picture

Marlow Film Studios would lead to the creation of an estimated 1,780 – 2,415 full-time equivalent (FTE) jobs, or 2,015 – 2,735 jobs when accounting for part-time working patterns. This would almost double existing employment in Buckinghamshire's production industries.

2,700 individuals will mean 5,400 traffic movements, excluding HGV and other commercial vehicles. This is an accurate prediction and tallies with what is currently observed at Pinewood and Shepperton studios. Eighty four percent of journeys in the area are made by car or van every day. The film industry is atypical and a greatly larger percentage of journeys would be by car or van (perhaps 95%). This excludes commercial vehicles.

It has been reported that there would be an average of 2,490 construction jobs on-site throughout the construction period.

The sustainable transport plan is unrealistic the nearest train station Marlow is 1.5 miles away and infrastructure restrictions limit the service to once an hour. The nearest bus stop is 0.67 miles away and has a service of every 30 minutes. The idea of additional bus services is a fantasy. As a result the only practical way to access the site will be by car, so the 95% above may be an understatement. This is in stark contrast to the utopia of 40% non-car-based transport in the 'Transport Assessment Part 1'.

## **5 Environment**

**The planning proposal makes clear that there is a significant environmental impact from the construction as well as the operational stage.**

### ***Biodiversity loss***

This includes the habitats of many threatened and vulnerable species (e.g., roosting bats, nesting birds) and so-called highly distinctive habitats (e.g., wet woodland; as noted in the "Biodiversity Net Gain Part 1" document).

Even if nesting/roosting opportunities were recreated, the food source will have completely disappeared, making this a pointless exercise. The document 'Biodiversity net gain Part 2' states that 'Further possibilities for off-site compensations will be assessed to help the development achieve a minimum of 10% net gain for biodiversity.' This means the developers currently do not have a tangible or credible plan to mitigate the loss of fauna and flora, on-site or even off-site. This is simply not acceptable for this scale of development on a biodiverse area.

### ***Other area of concern***

- o Sewerage - 'sewers have sufficient capacity'; but what about the treatment works?
- o Contamination of water courses / Thames – Deep piling will be required which may interfere with the water flows. This is a major potential issue that needs more investigation, especially leachate to aquifer
- o Light Pollution - The visual impact of night time light pollution is underplayed by the assessment methodology.
- o Construction disruption - a Construction Environment Management Plan would be agreed with Bucks Council but is it enforceable?
- o Noise and Vibration - effects of HGVs considered on neighbouring highways, but not on the site itself (143, p23). Gunfire and explosions 'should be avoided' post 23:00.

## **6 Impact on the Country Park**

**Development on the scale proposed would seriously undermine, if not destroy, the underpinning structure for development of the Country Park.**

**It will be wholly inappropriate, in evaluating impact on the Green Belt, for any weight to be given to the downgraded condition of the site claimed by the Applicant.**

As the main thrust of the application is to emphasise the very special circumstances, it is not surprising that it seeks to undermine:

### ***The Green Belt value of this rural countryside site***

Throughout the case documentation the Applicant seeks to rubbish the condition of the site by referring to it, for example, as: 'landfilled', 'despoiled land' and having a 'damaged nature... (spoil and rubble)'

Much of the site has indeed been landfilled. Not all of it was initially restored to the approval standards required at the time (to be suitable for agricultural purposes). Those shortfalls were subject to a lengthy series of enforcement and court actions over many years during which further restorative action was required by Bucks County Council. Some illegal earthworks (e.g. field edge bunds) were subsequently approved retrospectively, but to a compromised standard. Much of the residual spoil and rubble left for many years on parts of the site followed unauthorised intrusions by caravan dwellers and illegal tipping.

The reality is that the current condition of the larger parts of the site, previously owned by successive landowners with a view to seeking large scale speculative developments, is a consequence of irresponsible land management and neglect by those landowners. This contrasts with the responsible land management conducted by adjacent long standing local landowners.

Before the worst of the neglect, the restored land was grazed by cattle (photographic evidence is available).

### ***Little Marlow Lakes Country Park RUR4 Policy Area***

The proposed site is in a strategically sensitive landscape location within the setting of Marlow town, the adjacent Chilterns AONB, views across the site from the Berkshire Chilterns escarpment (Character Area 110) and the RUR4 Policy Area (Little Marlow Lakes Country Park).

As the Chiltern Conservation Board has pointed out, the site is also located within one of the candidate areas subject to priority evaluation by Natural England for an extension of the Chilterns AONB into the Berkshire Chilterns south of the river Thames. Together, these landscape sensitive areas form an integrated rural setting for protection of the Green Belt between Maidenhead and High Wycombe and forms a highly attractive and scenically valued part of the valley corridor of the river Thames.

The inclusion of the north-western corner of the RUR4 Policy area (in which the applicant's site is located) as part of a country park and its retention as open countryside plays a central role in linking together these important adjacent landscapes

The underlying essence of country parks, in any case, is to provide public access to the open countryside. Green Belt designation reinforces that purpose. Whether or not the applicant's site is within a designated country park, the openness of this Green Belt area should be permanently protected, so as to retain the countryside 'feel' for the central PROW which crosses the centre of the RUR4 Country Park area from Marlow to Well End/Bourne End.

Although the 2002 Little Marlow Gravel Pits Supplementary Planning Guidance (SPG) is now 20 years old, it remains live. The zonal structure set out in the SPG Masterplan (p19) identifies three spatial zones that cross the country park area. These provide the underpinning core structure for development of the country park. The applicant's development proposals would obliterate the key north-west segment of Parkland and Northern Open Zone, which the SPG sought to retain as 'a quality landscape setting for the entrance to the Country Park and Westhorpe House' (Para 5.2.1). It would also introduce built development into the western part of the Central Lakes Zone and compromise its potential for natural habitat development.

### ***Status and delivery of the Country Park***

The applicant challenges the formal status of the Little Marlow Lakes Country Park with regard to the Countryside Act 1968. However it presents no formal legal evidence to back up its own interpretations of the Act and its implicit allegations that the Council's decisions regarding provision of the Country Park are flawed or incomplete. This line of argument, and any implications arising from it (including the allegation that 'there is no 'Country Park' - Planning Statement 10.32), should therefore be ignored.

As part of its criticisms that the Council that it has made little progress in delivering the Country Park, the applicant provides incorrect information as to the percentage of the RUR4 land area that is now owned by the Local Authority. The quoted 55ha does not include Spade Oak Wharf (for which the Council owns the title), Spade Oak Meadow, Coldmoorholme Lane public car park, the three parcels of land constituting the Riverwoods Public Open Space and picnic area, the land leased to Marlow Football Club and the Wycombe Athletics Centre ground, which is on a long-term lease to the Council.