

18/01212/OUT - Shepperton Studios, Studios Road, Shepperton
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Planning Committee

12 February 2019



Application No.	18/01212/OUT
Site Address	Shepperton Studios, Studios Road, Shepperton. TW17 0QD
Applicant	Shepperton Studios Ltd
Proposal	Outline planning permission with all matters reserved (except for principal points of access) for the redevelopment and expansion of Shepperton Studios, comprising the partial demolition and replacement of existing accommodation; construction of new sound stages, workshops, office accommodation, entrance structures and reception, security offices and backlots; creation of new vehicular and pedestrian access from Shepperton Road and the relocation of existing access off Studios Road; with associated car parking; landscaping and ecological enhancements.
Case Officer	Russ Mounty / Siri Thafvelin
Ward	Laleham and Shepperton Green
Called-in	N/A

Application Dates	Valid: 17.08.2018	Expiry: 16.12.2018	Target: Extension of Time 15.02.2019
Executive Summary	<p>The proposal is for the redevelopment and expansion of Shepperton Studios. Whilst the LPA has no objection in principle to the redevelopment of the existing studios site, the expansion represents the development of an additional 39 ha of land within the Green Belt.</p> <p>The proposal represents a significant quantity of additional development in the Green Belt, which would more than triple the area of the existing Shepperton Studios, replicating a similar physical form on undeveloped Green Belt land.</p> <p>The proposal represents inappropriate development in the Green Belt, which is recognised by the applicant, and is by definition harmful and should not be approved except in very special circumstances.</p> <p>The protection of the Green Belt is a national policy objective and the Government attaches substantial weight to it, with permanence as a key element. Development should not be approved except in very special circumstances, which will not exist unless the potential harm to the Green belt and any other harm is clearly outweighed by other considerations.</p>		

The applicant's case is founded on 10 key principles set out in document 05: Planning Statement:

1. The projected growth of the global film and high-end television (HETV) sectors.

The evidence indicates that the sector has grown year on year between 2013 and 2017, however the scale of future demand is difficult to predict given the uncertainties and risks, both UK based and Globally, and the rapid restructuring of the industry. There is uncertainty regarding growth forecasts for cinema due to the growth in HETV and multi-platform consumption of content, but very strong confidence in growth overall of screen based industries.

2. The Government's support for the Creative Industries and the leading role and potential of the UK, West London and especially Shepperton in providing for that growth.

The creative industries was named as a priority sector in the 2017 Industrial Strategy, which led to the 2018 Sector Deal, which provides a framework for targeted investment. The case study within the Strategy identifies Pinewood, Shepperton and Leavesden as being important for sector health and dynamism and to ensure the continued attraction of major inward investment. However, it does not reference Dagenham or Quartermaster in the east of London, neither of which are located in the Green Belt.

There is industry consensus in the lack of capacity being a barrier to growth for the UK screen industry, but less consensus as to where this capacity can be delivered most effectively. The West London arc is the most significant cluster and the studios have the international brand value to attract investment which newer studios cannot guarantee. An expanded Shepperton Studios with improved facilities is therefore in the national interest, albeit that greater equality across both studios and regions would represent a more sustainable form of growth.

3. The role of the West London Cluster as a prime location for investment in the film and HETV sector.

This role is defined by the major studios, Pinewood Shepperton and Warner Brothers, which claim to be of national significance because of their ability to secure inward investment. However, both Shepperton (as part of the Pinewood Group) and Warner Brothers, are relatively new to their respective locations.

In addition there is no Government policy or dispensation for economic development that would override the Government's continuing commitment to the protection of the Green Belt

4. The shortage of capacity within the leading UK studio facilities in the West London Cluster to meet the identified demand.

Whilst there is a recognised shortage of studio capacity in the UK, both Pinewood Studios, Iver and Warner Brothers, Leavesden have sought and received permission to expand their facilities (2014/2015 respectively) to address the UK's unmet demand.

The applicant's supporting documents show that based on the blockbuster market potential, even with the Shepperton Expansion, there will be a shortage of capacity. This means that the expansion of all three studios would, despite having been inappropriate development, would not have accomplished their stated aim.

However, the expansion of Shepperton Studios would address a major portion of the potential demand for production space close to London and would lift the capacity and performance of the Western Arc at a time of significant industry growth and change. However, this particular development should be understood within the potential timescale and a wider regional context, where new facilities in East London and nationally will also help meet demand.

5. The need for Shepperton to expand and improve its facilities to meet the identified demand and accommodate current and future requirements.

There is no doubt that to meet demand and nurture new demand, the specification of facilities and associated services is as important as their scale. An expanded Shepperton Studios would be able to operate from a position of strength as a key player in the West London Arc.

However, the need to expand and improve facilities to meet demand and accommodate future requirements is not specific to this particular business. Government has made no special dispensation for economic development that would override its firm commitment to the Green belt

6. The world-class reputation of Shepperton Studios to be secured for the future through the proposed £500 million investment.

There is no doubt that Shepperton Studios has a world-class reputation, albeit that this is based primarily on Pinewood Studios Group, and that the proposed investment is substantial. However securing reputations is outside of the planning scope irrespective of the level of investment.

Pacifica Ventures who are building at Dagenham have been quoted as saying:

'We are thrilled to partner with Be First in the creation of a world-class film and television production complex that will become the pride of Dagenham.'

Warner Brothers Studios at Leavesden stated in its Planning, Design and Access Statement that:
'Its world-class film making facilities have made it the location of choice for many film makers working in the UK...'

Pinewood Studios at Iver stated in its Planning statement that one element that the case for expansion was founded on was:
'The world-class leading standing of Pinewood Studios which has grown out of history and is now represented by a multi-million pound investment in state of the art screen media production.'

It is considered that the reputation of Shepperton Studios would be unaffected by the decision on this application.

7. The tested commercial and design solution for the redevelopment and expansion proposals

The Outline application with all matters reserved, seeks a decision on the principle alone. In this case the principle is for the acknowledged, inappropriate development of commercial buildings in the Green Belt.

8. The substantial associated economic and social benefits of scale.

Shepperton Studios is generally considered to be an anchor facility for the UK film and TV industry. Shepperton's trading and investment relationships are predominantly with the USA which reduces the risk profile associated with Brexit. The proposed expansion at Shepperton Studios would help to satisfy existing demand for production capacity in the UK and, specifically in the London area and would build economic confidence in the UK for blockbuster film production. HETV and the associated creative industries. Despite the uncertainties of Brexit it is considered important for the UK film industry to move forward with confidence and be in a position to capture the biggest and best productions.

9. The absence of a credible and viable alternative to a major expansion at Shepperton Studios if the UK film growth ambition is to be met.

Although the applicant seeks to justify this by arguing that to capture the scale of international film identified by Government policy, new provision will have to be located in the West London cluster, this has not been specifically recognised by Government policy. The Government has however specifically stated that there is no general dispensation for economic development that would override the protection of the Green Belt.

Although the applicant refers to this being supported by the scale and urgency defined in Government policy, the Government's target for UK film growth relates to £4bn of inward investment by

2025. However the outline application seeks a time limit for the submission of reserved matters of 10 years, with two years to commence construction, which gives a potential date of 2031 six years beyond the Government target.

In the Document 07:Review of UK Film and High-End TV production facility market indicates that even with the expansion of Shepperton Studios, the market potential for additional studio capacity will not be met. This analysis also identifies the Shepperton Studios capacity being available by 2022, which does not reflect the submitted application.

The reference to the scarcity of land and costs involved is recognised, but there is no policy at national or local level that would allow this to override Green Belt policy.

In addition the US based Pacifica Ventures has secured the development of brownfield land in Dagenham (NE London) for 12 sound stages covering 24,526 m², post-production, visual effects and media technology complex, special stages for job training programmes, an auditorium, and retail and dining spaces in mixed use development.

10. The considerable harm to the industry that would arise from lost inward investment and economic benefits should the proposal not proceed.

The evidence indicates that the sector has grown year on year between 2013 and 2017, as evidenced by in the applicant's submission. New studios are being developed across the UK representing both inwards investment and economic benefits. In Northern Ireland, the £20m Belfast Harbour Studios project is providing over 11,148m² of facilities. In Scotland the £230m Pentland Studios project is set in 42 ha and will offer a range of facilities. Wolf Studios Wales is working with the Welsh Government for a new studio in Wales. There are proposals for more studios at Purfleet and North Greenwich. Elstree has finance and approval for an additional stage and backlot space. Space Studios in Manchester is constructing its sixth soundstage as part of a £14m expansion.

The interests of the Pinewood Studios Group, in this particular case for the expansion of Shepperton Studios, and the overall film and TV sector do not directly coincide and Pinewood Studios Group does not equate to the UK film industry as a whole.

This principle, as an argument to support a planning application, is neither unique nor specific to Shepperton Studios.

	<p>Pinewood Studios at Iver stated in the Planning Statement that one of the elements that the case for expansion was founded on was:</p> <p><i>'the harm that would arise from lost inward investment and economic benefit should the proposed expansion of Pinewood Studios not be allowed to proceed.'</i></p> <p>Warner Brothers Studios at Leavesden stated in its Planning, Design and Access Statement referred to: <i>'.. the significant risk to the UK film industry if the investment is not encouraged...'</i></p> <p>There is no general dispensation for economic development within the film industry that would override the continued commitment from the Government to the protection of the Green Belt and it is short sighted of the film industry to recycle this argument to support inappropriate development.</p> <p>There is consensus that the UK lacks adequate studio capacity to meet the current demand and whilst it is anticipated that the shortfall put forward by the applicant is overstated, the evidence suggests that capacity is currently constrained and further studio space would be beneficial.</p> <p>Although there is strong and consistent Government support for the creative industries there is also a desire to unlock further growth in the regions outside of London and the South East.</p> <p>With the development of studios across the UK, it is clear that investment opportunities are being secured and the UK's film industry is thriving. However, it must be recognised that the Pinewood Studios Group Ltd and Warner Brothers are international brands that clearly have the ability to secure significant investment, beyond that of the majority of UK studios.</p> <p>The potential economic benefits would contribute to the national objectives of economic growth and support for the film industry, although regionally and locally the benefits are considered to be less significant. It must also be acknowledged that there is a degree of risk arising from uncertainty and if the development were not fully implemented the anticipated benefits would not be realised whilst the intrusion into the Green Belt and harm to the national interest would be permanent.</p> <p>Careful consideration has been given to the Government's conflicting aims of protecting the Green Belt and promoting sustainable economic growth and it is concluded that the harm to the Green Belt and other identified harm is clearly outweighed by the national economic argument and the support for Government policy aims.</p>
<p>Recommended Decision</p>	<p>Approve the application subject to conditions as set out at Section 22 of the Report.</p>

	N.B. Under the Town and Country Planning (Consultation) (England) Direction 2009 the application must be referred to the Secretary of State before any permission can be issued.
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MAIN REPORT

1. Development Plan

1.1 The following policies in the Council's Core Strategy and Policies DPD 2009 are considered relevant to this proposal:

- Strategic Policy SP1: Location of Development
- Strategic Policy SP3: Economy and Employment Land Provision
- Strategic Policy SP5: Meeting Community Needs
- Strategic Policy SP6: Maintaining and Improving the Environment
- Strategic Policy SP7: Climate Change and Transport
- Policy LO1: Flooding
- Policy EM1: Employment Development
- Policy EN1: Design of New Development
- Policy EN3: Air Quality
- Policy EN5: Buildings of Architectural and Historic Interest
- Policy EN8: Protecting and Improving the Landscape and Biodiversity
- Policy EN9: River Thames and its Tributaries
- Policy EN11: Development and Noise
- Policy EN13: Light Pollution
- Policy EN15: Development on Land Affected by Contamination
- Policy CC1: Renewable Energy, Energy Conservation and Sustainable Construction
- Policy CC2: Sustainable Travel
- Policy CC3: Parking Provision
- Saved Policy GB1: Development Proposals Within the Green Belt
- Saved Policy BE26: Archaeology, Ancient Monuments and Historic Landscapes

2. Other Relevant Documents

2.1 In addition to the documents submitted by the applicant, the following primary documents or publications are also referred to in the report:

- National Planning Policy Framework 2018
- ARUP, *Spelthorne Borough Council Green Belt Assessment (Stage 1) Report: Methodology and Assessment*, London, Ove Arup & Partners Ltd, 14 February 2018
- Industrial Strategy: Creative Industries Sector Deal 2018
- Economic Strategy 2017-22 Spelthorne Borough Council

- The Local Planning Authority sought independent advice and review from Oxera Consulting (economics), Tom Fleming Creative Consultancy (Creative Industries) and Peter Davidson Transport Consultants (Transport). This independent advice has been incorporated into the planning review and this Committee Report

3. Relevant Planning History

- 3.1 The relevant planning history of the site is attached at Appendix 2.

4. Description of Current Proposal

Background

- 4.1 The application is made by Shepperton Studios Ltd which is part of the Pinewood Studios Group Ltd. There has been a film studio on the site since the early 1930s when it was established within the grounds of Littleton Park Estate and the studio facilities has since then been extended significantly. Now the studios offer a wide range of facilities that are essential for film and HETV production, including:

- 14 sound stages
- 31 workshops
- Production offices
- Dressing rooms
- Make-up and hair facilities
- Meeting rooms
- Wardrobe workshops and costume storage and fitting facilities
- 3 external backlot areas

- 4.2 In Document 5: Planning Statement Shepperton Studios is described as a “market leader with a global reputation” and a provider of “a world class range of facilities and services to the film and HETV [high-end TV] production industries” whose primary focus is the production of high budget feature films. The studio’s customers include filmmakers from around the world but a substantial proportion of its business also comes from UK film and other media producers.

Location and Description of Site

- 4.3 The existing film studios are situated west of Littleton village. To the west of the site is Studios Estate, a residential development that is accessed from Studios Road which runs along the northern boundary of the existing studios. Magdalene Road lies to the east of the site. To the north of Studios Road is Queen Mary Reservoir and its embankment and to the south is the River Ash and its woodland corridor.
- 4.4 The primary entrance to the site is on Studios Road but there is also a secondary access from a gate off Shepperton Road which leads to a path and bridges over the River Ash, however, the applicant states that this is only used by pedestrians and light vehicles to access the backlots.

- 4.5 The studios have expanded around the former Littleton Park Estate but the historic Littleton House remains within the site and is a locally listed building. The Church of St Mary Magdalene is situated immediately to the east of the site and is a Grade I Listed Building.
- 4.6 The existing studio site is approximately 11ha in area and accommodates more than 83,550m² of floorspace. In addition to the existing studio the application site also comprises 39ha of land located to the south-west and north-west of the existing studios (this includes the existing backlots) and a 10ha segment of the River Ash corridor between Squires Bridge Road to the east and the application boundary to the west. The existing studio backlots are situated in the south-eastern corner of the site and occupy 7.9ha of the application site.
- 4.7 The total site area is 60ha and the site is bounded by the Queen Mary reservoir to the north, Shepperton Road to the south, open fields to the west and the residential areas of Shepperton to the east. Studios Estate is situated in the centre of this area and does not form part of the application site.
- 4.8 The River Ash corridor runs through the centre of the site in a north-west to south-easterly direction. This 10ha area is owned by Spelthorne Borough Council.

Proposal

- 4.9 The description of the proposed development is:
- 4.10 *Outline planning permission with all matters reserved (except for principal points of access) for the redevelopment and expansion of Shepperton Studios, comprising the partial demolition and replacement of existing accommodation; construction of new sound stages, workshops, office accommodation, entrance structures and reception, security offices and backlots; creation of new vehicular and pedestrian access from Shepperton Road and the relocation of existing access off Studios Road; with associated car parking; landscaping and ecological enhancements.*
- 4.11 As the submitted scheme is an outline application with all matters reserved (except for principal points of access) no detailed plans have been submitted but there are a series of parameter plans which provide the framework and set the principles for which future reserved matters applications will be brought forward. Illustrative plans have also been submitted that show the form that development could take, however, these are not submitted for formal approval. Some revisions have been made since the application was first submitted and these changes are set out in a section below.
- 4.12 The application seeks detailed approval of the proposed means of vehicular access into the application site from the public highway. This includes a proposed new roundabout access from Shepperton Road and a secondary access from Studios Road and reconfiguring the access to Studios Estate. Internal access arrangements within the application site would be considered as a reserved matters application but would include vehicular and pedestrian circulation routes and a new bridge over the River Ash would connect the north and south parts of the site.
- 4.13 Parameter Plan PP.4 identifies the proposed development zones consisting of sound stages, workshops, offices and backlots. These are described in Table

6.1: Types of Proposed Accommodation in Document 5: Planning Statement, summarised below:

- Sound stages: Large soundproofed buildings used for shooting film and recording dialogue
- Workshops: Used for the construction of sets and props
- Offices: A small amount of floorspace would be used by SS. Most of the floorspace would be used by individual production companies for the creative, managerial, financial and administrative functions of a production. Offices can also be used more flexibly by productions for e.g. dressing rooms or meeting rooms or be occupied by companies providing a range of media-based support to the production companies.
- Backlots: Open land used for the construction of exterior sets and filming outdoor special effects. They can also be used for temporary storage and parking of vehicles.

4.14 The plans show the maximum building height that would be permitted for each development zone including parking areas.

4.15 As part of the proposed expansion a number of buildings within the existing studios site would be demolished and replaced by new buildings. The existing and proposed floorspace is set out in Table 6:2 in Document 5: Planning Statement, replicated below:

Accommodation	Existing (A)	Demolitions (B)	Proposed new (C)	Total (A+B+C)	Net addition (D)
m ²	83,560	51,859	164,708	196,409	112,849
sq ft	899,432	558,206	1,772,902	2,114,129	1,214,696

Table 1: Existing and proposed floorspace, Document 5: Planning Statement

4.16 In order to retain flexibility, the applicant is seeking consent for the overall floorspace figures above which would be provided in accordance with the development zones and restrictions set out in the parameter plans.

4.17 The proposed development would be divided into zones each with a maximum height of 7m, 10m, 15.5m or 21.5m, as shown on plan no. PP.5 – Heights.

4.18 Green infrastructure and soft landscaping is proposed as well as flood protection in the form of a Sustainable Drainage System (SuDS).

Existing and proposed floorspace, Table 6:2 Document 5: Planning Statement

Revised Plans

4.19 Revised Plans were submitted to the LPA on 6 November 2018.

4.20 Plan PP.3 Movement was revised to show a realignment of the internal roadway to locate it further from the properties within the Studios Estate following the public consultation. The LPA had requested that the primary route be labelled as indicative since the application is Outline with all matters reserved, however the applicant considered that adequate flexibility is provided in their plan. The Reserved Matters in respect of the access would

be required to include details of the internal roadway and this was considered acceptable.

4.21 Plan PP.4 Development Zones was revised in three areas:

- Zone B1 has been reduced to provide a 30m landscape area on the western boundary with Shepperton Road.
- Zones A4 and A5 have been reduced to provide a larger landscape buffer between the development zones and the eastern boundary. The buffer with the properties to the south, on Laleham Road, has not been extended, although this is identified as backlot area.
- Zones F14 and G13 have been amended to accommodate moving the internal carriageway. Although G13 now extends the entire length of the Studios Estate, a 20m buffer would be provided between the housing and the car parking area.

4.22 Although the LPA requested that the use of the area above D12 be identified, the applicant has declined to do so considering it retains its current status and any future use would require a specific planning permission.

4.23 Plan PP.5 Heights was revised to show a 35m buffer area adjacent to the Church before the 15.5m height parameter, a 10m buffer providing a no construction zone and a 7m maximum height zone between them.

4.24 Although the applicant does not consider that the setting of the Church has significant value, this has done this at the request of the LPA.

4.25 The LPA also requested that a similar buffer be placed around Littleton House, but the applicant has declined to do so because of the existing type of development around the building. They also consider the 15.5m height parameter would not make the proposal unacceptable.

4.26 In addition, the height parameter adjacent to Studios Estate eastern boundary has been reduced to 7m, where the current infrequent buildings are small scale, but retained at 10m on the northern boundary where the existing buildings are this height.

4.27 Plan PP.6 Green Infrastructure was revised to show additional green infrastructure along the southern boundary and at the south western corner.

4.28 On the eastern boundary the LPA requested that the existing bund be retained, however the applicant has declined suggesting it was put in place to screen the minerals extraction works and that the current landscaping is not of good quality.

4.29 A buffer zone of 20m between any development and the River Ash was also requested, but again the applicant has declined to provide this, stating that they do not see any need or benefit in ecological terms and that the plan already provides buffer in excess of 15m.

4.30 Plan PP.7 Flood Protection has only been revised to take account of the changes in the alignment of the internal road and development zones and makes no changes to the proposed strategy.

4.31 Plan PP.12 Composite Masterplan has been revised to address the changes to the parameters.

4.32 The Illustrative Masterplan in the Design and Access Statement has also been amended, but the applicant has highlighted that this for illustrative purposes only and does not form a plan for which approval is sought.

5. Consultations

5.1 The following table shows those bodies consulted and their response.

Consultee	Comment
Gas (National Grid)	No Objections subject to informative
Esso Fawley to West London	No Objections
BPA Pipelines	No Objections
National Grid	No Objections
Streetscene	No Comments
Natural England	No Comments
County Highway Authority	No Objection subject to conditions
Environment Agency	No Objections subject to conditions
Renewable Energy	No Objections subject to conditions
Thames Water	No Objections
Environmental Health: Contamination	No Objections subject to conditions
Environmental Health: Noise	No Comments
Environmental Health: Air Quality	No Objections subject to conditions
Lead Local Flood Authority	No Objections subject to conditions
Surrey Wildlife Trust	No Objections subject to conditions
SCC Strategic Planning	No Response Received
Heritage England	No Response Received
SBC Tree Officer	No Objections subject to conditions
SBC Conservation Officer	No Objections
SBC Countryside Officer	No Objections subject to conditions
Highways England	No Objections

6. Public Consultation

6.1 342 properties were notified of the planning application and 3 copies of a statutory site notice was displayed at 3 separate locations around the site.

6.2 133 letters of representation have been received. In some cases multiple representations were received from the same address and these are not reflected in the numbers. In addition, some representations were received from international addresses and these are also not reflected in the numbers.

6.3 The issues in support of the application note the following:-

- The shortage of studio space
- Geographic convenience of Shepperton
- Excellent crew base
- Benefit to international business partners
- Benefits to HETV production capability
- Economic benefits to UK
- Ability to attract international productions
- Inward investment would benefit the UK's creative sector
- Global blockbusters have not chosen UK because of the lack of facilities
- Enormous benefit to UK film industry
- The support for local education assistance
- The boost to the local economy
- The provision of local jobs
- Increase to local and regional creative economy
- The enhancements to the River Ash corridor
- Improvements to local pedestrian and cycle links
- Investment shows a commitment to Spelthorne Borough
- Greater opportunities for local community
- Will provide a continued incentive for inward investment in the UK
- The site is well located
- Proposal will increase educational and graduate prospects
- Benefit to UK job opportunities
- Substantial private sector investment
- The region would benefit from innovation and support
- Shepperton is of national importance
- Proposal will strengthen the role of Shepperton in the industry
- Will provide sponsorship and apprenticeship schemes

6.4 Reasons for objecting include: -

- Contrary to NPPF
- Contrary to Local Plan
- Very special circumstances are not very special
- Impact on the Green Belt
- Location of parking areas

- Increased traffic through Laleham
- Traffic generation
- Increased HGV movements
- Impact on Church of Mary Magdalene
- 10 year Time Limit is excessive
- Cumulative impact of traffic
- Overlooking from office units
- Impact on Laleham's listed buildings and Conservation Area
- Impact on wildlife
- Flood risk
- Risk of studio failing
- Removal of existing bunding
- Potential impact on Ash Link Local Nature Reserve
- Environment should not be sacrificed for the National economy
- Inappropriate ground conditions from restoration
- Light pollution
- Loss of habitats
- Damage to trees
- Design and appearance
- Increased accident risk
- Increased parking in Studios Road
- Adjacent to residential area
- Proximity to residential properties
- Out of proportion with the location
- Visual impact of proposal
- Travel plan mitigation of limited value
- Lack of local employment
- Limited value of apprenticeships and training
- No local economic benefits
- Inappropriate mitigation
- Insufficient mitigation
- Hours of operation
- Crossing points needed
- Highway improvements required
- Inadequate parking provision

- Impact of vibration on buildings
- Traffic Assessment flawed
- Interior circulation road
- Location of security entrance
- Noise and disturbance
- Light pollution
- Traffic fumes

6.5 In addition, the applicants note in their Statement of Community Involvement that they have undertaken a comprehensive strategy for pre-application consultation with key stakeholders and the local community.

7. Planning Issues

7.1 The application site includes land within the Green Belt and would involve significant new development within it. Since the application is Outline with all matters reserved the planning issues, at this stage, are limited in scope:

- Impact and harm to the Green Belt (section 8)
- Traffic generation (section 9)
- Loss of habitat (section 10)
- Visual impact (section 11)
- Impact on the historic environment (section 12)
- Flooding (section 13)
- Air quality (section 14)
- Contamination (section 15)
- Noise and disturbance (section 16)
- Environmental impact assessment (section 17)
- Light pollution (section 18)
- Other considerations (section 19)

8. Impact and harm to the Green Belt

8.1 The site lies within an area where much of the land is designated as part of the Metropolitan Green Belt. The existing studios site and Studios Estate to the west of the studios are excluded from the Green Belt but the remainder of the site to the north, west and south, including the River Ash corridor is designated Green Belt land. The site is 60ha and of this, 39ha is within the Green Belt.

8.2 The illustrative masterplan shows that the proposed development in the Green Belt to the north of the River Ash includes car parking, office/workshop buildings, a soundstage and a backlot for external filming. The area to the south of the River Ash is entirely within the Green Belt and has recently been restored after being used for mineral extractions and the illustrative

masterplan shows that this part of the site would contain a new studios entrance, sound stages, office/workshop buildings, a backlot and car parking.



Figure 1: Extent of Green Belt with application site outlined in red, 2015 aerial photograph

- 8.3 Paragraph 133 of the National Planning Policy Framework (2018) 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 and their permanence.* This wording is unchanged from paragraph 79 of the NPPF 2012.
- 8.4 The five purposes of the Green Belt, as defined in the NPPF are:
- to check the unrestricted sprawl of large built-up areas;
 - to prevent neighbouring towns merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 8.5 The Council's Saved Local Plan Policy GB1 is mostly reflected in the Green Belt policy set out in the NPPF, but it should be noted that policy GB1 was saved from the 2001 Local Plan and therefore pre-dates the current NPPF. Although there is a degree of consistency with the NPPF, policy GB1 does not allow for any development unless it is one of a number of acceptable uses set out in the policy and also maintains the openness of the Green Belt. This is

contrary to national policy which allows exceptions to this when the identified harm to the Green Belt is clearly outweighed by other considerations that constitute very special circumstances. Because of this inconsistency with the NPPF the impact of the development on the Green Belt should be considered primarily against the policies of the NPPF rather than policy GB1.

- 8.6 With regards to the current and future extent of the Green Belt, paragraphs 136-137 of the NPPF stipulate that once Green Belt boundaries have been established they should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. As part of the preparation of a new Local Plan, Ove Arup & Partners Ltd (Arup) were appointed by Spelthorne Borough Council in 2017 to undertake a Stage 1 Green Belt Assessment (GBA) to assess and confirm whether the Spelthorne Green Belt meets the purposes as defined in the NPPF. The NPPF was revised in 2018 but the GBA is still considered relevant. The GBA does not, in itself, determine whether Green Belt land should be released or explore the potential suitability of areas of Green Belt for development, however, it does provide evidence of the performance of the Green Belt against the five purposes above and recommends areas that would warrant further consideration by the Council as part of the process of preparing a new local plan.
- 8.7 The GBA identified two tiers of land parcels: Strategic Green Belt Areas ('Strategic Areas') and Local Green Belt Areas ('Local Areas'). The assessment divided Spelthorne into two strategic areas that were consistent with the areas adopted by Elmbridge Borough Council for its GBA. The application site lies within 'Strategic Area B' which is described in paragraph 4.3.1 of the GBA as "a band of Green Belt maintaining separation between a number of settlements including Ashford / Sunbury-on-Thames / Stanwell, Staines-upon-Thames / Shepperton / Walton-on-Thames, and Chertsey, Addlestone, and Egham." In its conclusion (section 7), the assessment affirms that this area "plays an important role in meeting the fundamental aim of the Green Belt through preventing sprawl from settlements in Surrey by keeping land permanently open".
- 8.8 The GBA then divided the Green Belt into smaller parcels with defining features such as motorways, A and B roads, railway lines, rivers, brooks and reservoirs as their boundaries for the purpose of the assessment, however it is important to note that the Green Belt is often perceived as a much larger or continuous area. The application site is situated within Local Areas 25 and 33 shown in Figure 2 (overleaf).
- 8.9 The River Ash forms the southern boundary of area 25 which encompasses the north side of the application site that is within the Green Belt (which does not include the existing studios site or Studios Estate) and broadly includes the area surrounding Queen Mary Reservoir to the north of the site.
- 8.10 Area 33 in the GBA encompasses the south part of the site and the surrounding land between Laleham to the west and Littleton and Shepperton to the east.
- 8.11 In the assessment, area 25 was considered to be moderately performing against the Green Belt purposes and area 33 was rated strongly performing. As stated above, the GBA does not on its own decide if a piece of land is to be retained or removed from the Green Belt, as this can only be done through the Local Plan, however it is nevertheless useful to note that majority of

Green Belt land that this application proposes to develop upon is considered to meet the purposes of the Green Belt strongly.

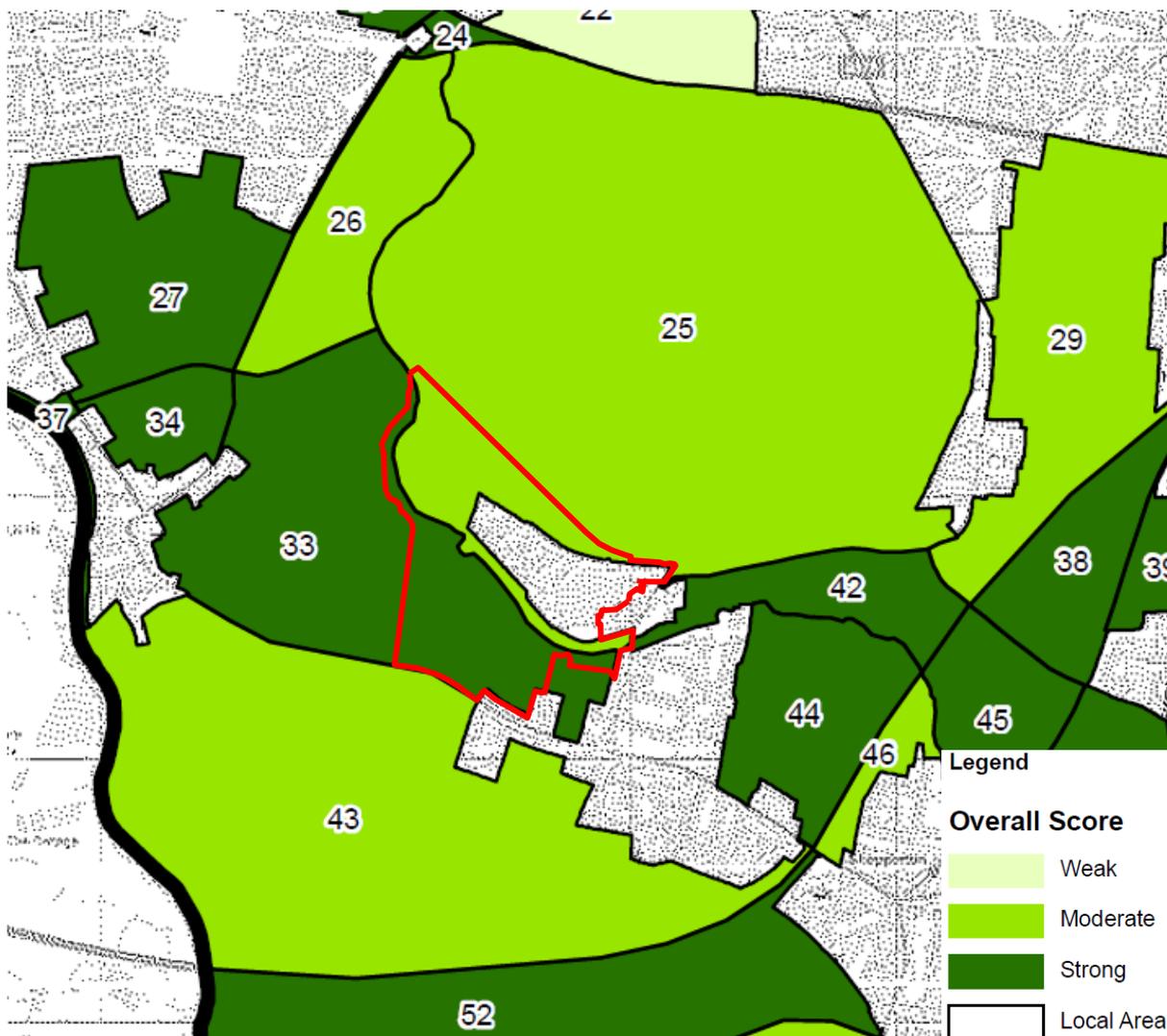


Figure 2: Excerpt from 'Map 5.5 Overall Assessment Scores' from Spelthorne Green Belt Assessment by ARUP (2018). Application site added in red.

- 8.12 Notwithstanding the above, the position for this application is that the site falls within the approved Green Belt and the determination of a planning application cannot remove land from the Green Belt. Any application on Green Belt land must be assessed against national and local Green Belt policy including the five purposes of the Green Belt, whether the development is appropriate within the Green Belt and if it is inappropriate whether the harm is clearly outweighed by other considerations which constitute very special circumstances. This will be considered below.

Inappropriate Development in the Green Belt

- 8.13 Paragraphs 144-145 of the NPPF state that:
“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.
“A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt.”

- 8.14 Paragraph 145 of the NPPF then continues to list a number of exceptions which are not considered to be inappropriate development in the Green Belt. Such development includes buildings for agriculture and forestry as well as limited infilling in villages. Paragraph 146 lists other forms of development which are also not considered to be inappropriate development, as long as they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it. Such uses include mineral extractions, engineering operations, and changes of use for outdoor sport or recreation.
- 8.15 It is recognised that part of the site comprises the existing studios site and that paragraph 145 allows for limited infilling or the partial or complete redevelopment of previously developed land which would not have a greater impact on the openness of the Green Belt than the existing development. The exceptions also include the replacement of buildings, providing that the new building is in the same use and not materially larger than the one it replaces and allows limited extensions to existing buildings. Whilst the indicative plans show that a number of buildings would be retained and others would be replaced within the existing site, the majority of the proposed development would be new development sited on undeveloped Green Belt land. The development of new sound stages, workshops, office accommodation, entrance structures and reception, security offices and backlots does not fall within the definition of appropriate development within the Green Belt as set out in the NPPF 2018 and is therefore considered inappropriate and must be assessed in accordance with the requirements in the NPPF.
- 8.16 The planning history of the site and historic aerial photographs show that approximately 22ha, which is a substantial part of the site, is land that has been restored from mineral extraction. Paragraph 146 of the NPPF sets out that this is not an inappropriate use of land in the Green Belt. The applicant refers to this as brownfield land, however, the Framework establishes that land that has been developed for minerals extraction or waste disposal by landfill, and provision for restoration has been made through development management procedures, is not considered to be previously developed land. It is acknowledged that there are some existing structures within the Green Belt part of the site, including a bungalow (The Bungalow, Laleham Nurseries, Shepperton Road), and buildings and greenhouses associated with the former Laleham Nurseries. These buildings would be demolished and the land redeveloped but it remains that the majority of the proposed expansion (not including the existing studios site) would nevertheless be on undeveloped Green Belt land which is open visually and spatially and which should be given substantial weight against the development.
- 8.17 It is considered that the proposed expansion of Shepperton Studios comprising new sound stages, workshops, office accommodation, entrance structures and reception, security offices and backlots, new access and car parking and other associated works does not meet any of the exceptions set out in paragraphs 145-146 of the NPPF and is therefore considered to be inappropriate development. Inappropriate development is, by definition, harmful to the Green Belt and permission for such development should not be granted except in very special circumstances. The applicant has put forward a number of considerations which they consider to be very special circumstances which will be addressed separately under 'Other considerations' (section 19).

- 8.18 Spelthorne's Core Strategy and Policies Development Plan Document 2009 saved policy GB1 replicates the fundamental principle in paragraph 144-145 of the NPPF. Whilst the current Local Plan pre-dates the publication of the NPPF (2018), policy GB1 is considered to be consistent with section 13 of the NPPF and should therefore be afforded full weight.

Green Belt Openness

- 8.19 The essential characteristics of Green Belt land is its openness and its permanence. These characteristics serve all five purposes of the Green Belt (defined in section 8 above) against which the proposed development will be assessed.
- 8.20 Openness is not defined in the NPPF but is commonly taken to be the absence of built development and this is the definition that the applicant has used in paragraph 9.5 of Document 5: Planning Statement. It is acknowledged that there is an important distinction between openness as being the absence of buildings and openness as being the absence of visual impact, however, the visual impact is also an intrinsic part of the assessment of a development against the five purposes of the Green Belt and the two meanings cannot therefore be completely separate. A development may be acceptable in terms of its visual impact on the surrounding landscape but still be unacceptable spatially as it would be contrary to the essential and enduring function of government policy for the Green Belt in keeping land free from development. For example, using landscaping to screen proposed development may in theory have an acceptable impact in landscape terms but still be harmful in terms of the visual dimension of openness of the Green Belt.
- 8.21 The Green Belt land of the south area has previously been subject to excavation and extraction works and following remediation works this area is predominantly flat and open in character. Part of the south area has been occupied by Laleham Nurseries and a number of small buildings and glasshouses remain on the site. There is also a bungalow near the entrance to the nurseries from Shepperton Road.
- 8.22 The Green Belt land of the north area abuts the embankment of the Queen Mary Reservoir to the north and a wooded area along the River Ash to the west. Part of this area was previously subject to excavation and extraction works and is now largely flat. There is an existing parking area situated on the Green Belt land between Studios Road and the reservoir embankment.
- 8.23 Whilst there is some development within the designated Green Belt part of the site, the land has the characteristic of openness to a substantial degree. Moreover, the proposal cannot be considered a like-for-like replacement in terms of openness as the existing development on Green Belt land is of a much smaller scale than the buildings that are likely to take their place if permission is granted.
- 8.24 It is relevant to note that although this application is for outline planning permission and detailed designs would not be considered until the reserved matters stage, in the event that the application is approved, there is considerable information available on the likely physical form of the proposed development. Document 10: Design and Access Statement shows examples of what the expanded studios could look like, including sound stages with a height of up to 21.5m, offices and workshops. There would also be roads,

parking and circulation areas which would also have an impact on the openness of the Green belt.

- 8.25 Two parts of the site are indicated as 'backlot' space which would not be occupied by permanent structures. One of the spaces indicated as a backlot is currently used for that purpose subject to a height restriction of 3m (see application reference 11/00382/FUL). The submitted plans indicate that part of the site would be undeveloped for landscaping, including buffers along the west, south and part of the eastern perimeter of the site.
- 8.26 It is important to note that whilst the studio buildings are likely to be the most prominent due to their size, the loss of openness is not just created by the new buildings, but also by the associated roadway, parking areas (and parked cars) and other associated development.
- 8.27 Bunding is not characteristic for this area and it is considered that whilst the proposed bunding and planting would reduce the visibility of the proposed buildings, it would also reduce the long distance views that are currently obtained and therefore further reduce openness and significantly reduce long-distance views that is characteristic for large parts of the site.
- 8.28 Taking into account the amount of development it is considered that the existing openness of the Green belt will be significantly harmed both visually and spatially, particularly in the south and western part of the site. Whilst the parameters plan PP.5 – Heights shows that the land to the north of the existing studio site and Studios Estate would be occupied by comparatively low buildings with a height of up to 7m, this would still harm the openness of the Green Belt.

Assessment of Harm

- 8.29 Officers agree with the applicant that that the proposed development constitutes inappropriate development in the Green Belt (Document 05 Planning Statement, August 2018) however, officers consider the harm to the Green Belt to be greater than what is accounted for in the applicant's planning statement, as set out below.
- 8.30 As quoted above, paragraph 134 of the NPPF sets out that the Green Belt serves five purposes against which proposed development within the Green Belt should be assessed.

To check the unrestricted sprawl of large built-up areas

- 8.31 The applicant acknowledges conflict with this purpose but considers it to be highly contained and restricted.
- 8.32 Littleton and Shepperton do in themselves comprise a large built-up area but are smaller settlements that are somewhat separate from the large area to the north comprising Staines, Ashford, Sunbury and Stanwell. Although Laleham is considered a village the north-western part of it is attached to Staines and the village could be considered to form the southernmost boundary of a larger built-up area.
- 8.33 The Council agrees that the application site is restricted when compared to the entire area of land within the Green Belt, however, this is likely to be the case for most development and when assessed against this Green Belt purpose it is considered that the proposed development amounts to the type of urban sprawl that the Green Belt is seeking to prevent. Due to the scale of

the proposed scheme it is therefore considered that the development would amount to urban sprawl that would conflict significantly with this Green Belt purpose.

To prevent neighbouring towns merging into one another

- 8.34 The applicant considers that there is limited harm to this Green Belt purpose and that the Green Belt will not be fragmented.
- 8.35 Littleton and Shepperton Green appear as one settlement separated by B376 that is separated from Shepperton to the east by the M3 motorway and an area of open space. There is much greater visual and physical separation between Littleton/Shepperton Green and Laleham created by the fields, grasslands and wooded areas within and also to the west of the application site.
- 8.36 Due to the location of the site to the east of Littleton, it is not considered that the proposed development would contribute to merging of Littleton/Shepperton Green and Shepperton. The development to the south of River Ash would largely be on undeveloped land and would result in an extension of Littleton westwards towards Laleham. Whilst it is acknowledged that the proposed development would not close the gap to physically link Littleton and Laleham, it would nevertheless bring them much closer together.
- 8.37 The proposed development would also effectively sever a piece of Green Belt land to the south east of the site (bounded by Laleham Road, Cranwell Grove, Winchstone Close, Squire's Bridge Road and the River Ash) from the wider Green Belt. It is also considered that the proposed development would contribute to the fragmentation of the Green Belt.

To assist in safeguarding the countryside from encroachment

- 8.38 The applicant recognises that the proposed development would encroach onto countryside but is considered to undervalue the quality of the site as they do not consider it to be an undeveloped greenfield site due to the previous gravel extraction and the structures associated with Laleham Nurseries. This is contrary to the NPPF which states that land that has been restored after it has been used for minerals extraction is not considered to be previously developed land.
- 8.39 Officers agree with the applicant that this purpose relates principally to openness and the beneficial use of land in accordance with the purposes of the Green Belt. The applicant acknowledges that the proposal would cause some harm to this purpose, however, it is considered that they have undervalued how significant this harm would be. Taking into consideration the size of the plot and the scale of the proposed development, it is considered that the proposal would represent a significant encroachment onto Green Belt land that is predominantly countryside and that there is therefore a clear conflict with this Green Belt purpose.

To preserve the setting and special character of historic towns

- 8.40 The applicant does not consider that there is any conflict with this policy purpose as the site is not within any proximity to an historic town. They argue that the wording of the Framework suggests that this Green Belt purpose is only relevant to settlements of a certain size but acknowledge that 'the retention of openness within or around a smaller settlement may in some

cases also contribute to the historic relationship between a larger settlement and its hinterland' (para 9.17 of the planning statement).

- 8.41 Officers agree with the applicant that the location of the proposed development would not affect the setting or special character of the historic parts of Shepperton, Lower Halliford, Lower Sunbury and Staines due to the distance between the proposed development and the above settlements.
- 8.42 It is also agreed that Laleham is not a town but a village. The NPPF states that the extent of the setting of a heritage asset is not fixed and may change as the asset and its surroundings evolve but does not provide a clear distinction of towns and villages for assessment purposes. Much of Laleham village is a designated conservation area with a number of listed buildings and monuments and it is therefore considered reasonable to consider the impact of the proposal on this setting. However, the local plan does not include Laleham as one of Spelthorne's towns or local centres and, moreover, in the GBA report Arup did not consider that this purpose was relevant to Laleham as it is not a town. It is therefore considered that the impact of the development on Laleham is more appropriately carried out as part of the impact on the historic environment assessment (see section 12).

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

- 8.43 This purpose seeks to ensure that development does not take place within the Green Belt when it could be located on brownfield land or within urban areas.
- 8.44 The applicant considers that there is no conflict with this policy purpose as there are no non-Green Belt sites that could be used to support urban regeneration or the recycling of derelict land. More importantly they argue that the location of the proposed development is geographically fixed and that there are no alternative locations or scope for disaggregation. It is noted that this argument was also used in the context of their previous applications to extend and redevelop Pinewood Studios in South Bucks.
- 8.45 The proposal would redevelop a part of the site currently used by the Studios (that is not designated Green Belt land) as well as a small proportion of previously developed Green Belt land.
- 8.46 Officers agree that there are no derelict sites or other urban land of this size within Spelthorne that is available for redevelopment. However, the onus is on the applicant to show that there are no suitable and available alternatives and there is considered to be insufficient evidence to conclude that the development can only be provided within Spelthorne as a whole.

Use of Land within the Green Belt

- 8.47 Paragraph 141 of the NPPF states that once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as:
- looking for opportunities to provide access;
 - to provide opportunities for outdoor sport and recreation;
 - to retain and enhance landscapes, visual amenity and biodiversity, and;
 - to improve damaged and derelict land.

- 8.48 The applicant has put forward some aspects of the scheme which they consider to be enhance the beneficial use of the Green Belt site and these opportunities are reviewed below:

To provide access, outdoor sport and recreation

- 8.49 There is currently no public access to the existing studios site or the other Shepperton Studios Ltd (SSL) owned parts of the site. 10ha of the application site is in the ownership of Spelthorne Borough Council and this area comprises the River Ash corridor, to which there is some public access.
- 8.50 The proposal would provide some improvements to the pedestrian links through the River Ash corridor and the extension of the existing footpaths to create a circular route. It is proposed that the improvements to the River Ash corridor would be secured through a Section 106 obligation. The improvements would also include ecological enhancement to compensate for the loss of green space elsewhere within the site (which is considered further under 'Loss of habitat') but it is recognised that the proposed improvements have the potential to also add to the attractiveness to the pedestrian route through the area.
- 8.51 The applicant considers that the improvements to the River Ash corridor represent a significant access and amenity gain when compared to the existing public access to the site. However, the riverside route would not be set in open countryside but would be surrounded on both sides by development. In addition, the proposed development is not an essential prerequisite for the extension of the footpath and improvements to the river corridor.
- 8.52 Therefore while there are likely to be some benefit in terms of access and recreation, it is considered that this can only be given limited weight.

To retain and enhance landscapes, visual amenity and biodiversity

- 8.53 The applicant claims that there is a net biodiversity gain, however, officers disagree with the applicant's chosen base level for the assessment and consider that the impact on biodiversity is more likely to be neutral. The full assessment and review of the impact on biodiversity and whether there would be an improvement compared to the current situation is set out under 'Loss of Habitat'.
- 8.54 There is some overlap between the impact of the proposal in relation to landscape and visual amenity and the overall visual impact which is a separate main consideration. As the application is Outline there is no detailed information about the form or location of specific elements of the development beyond those shown on the parameters plan. Notwithstanding this, it is clear that the proposed development is very likely be of a scale that would significantly reduce long distance and open views across fields from the public domain, particularly across the south area where there are currently long views towards Shepperton from Laleham and through the trees along Shepperton Road.
- 8.55 The proposal includes the opportunity for landscaping which would improve the appearance of the site and whilst elements such a wooded bund would aid to conceal part of some of the buildings from views from the west (e.g. Laleham), such bunding is not characteristic of this otherwise largely flat landscape. It is noted that bunding was created when permission was granted

for the backlot in the south-eastern corner of the site, however, the main purpose of this was to reduce the impact on adjoining residential properties and was situated on the edge of the green space as opposed to between what are currently two large expanses of mostly open land.

- 8.56 Therefore, whilst the proposed landscaping is considered to improve the appearance of the proposed development, it would nevertheless have a harmful impact on the existing Green Belt land and its wider landscape qualities.
- 8.57 Officers agree with the applicant that the site is not considered to be damaged or derelict land. Previous mineral working required the provision of restoration plans which were intended to ensure a high quality environment. It is therefore not considered that this opportunity to improve the Green belt is relevant in this particular case.

8.58 **Summary of Green Belt Impact**

- 8.59 The proposal represents inappropriate development on Green Belt land and is therefore, by definition, harmful to the Green Belt and permission should therefore only be granted if the harm is clearly outweighed by other considerations.
- 8.60 Officers have assessed the proposal against the five purposes of the green belt set out in the NPPF and consider that the proposal would constitute urban sprawl and contribute to the fragmentation of the Green Belt. The Green Belt site is predominantly countryside and officers do not consider that the proposal would safeguard the countryside from encroachment. Whilst the impact of the proposal on the historic village of Laleham and will be considered below, as it is not a town officers do not consider that the proposal would harm the setting of a historic town for Green Belt purposes. Officers do not consider that the applicant has provided sufficient evidence to conclude that the development can only be provided within Spelthorne, and for the purposes of the Green Belt it is not considered that the proposal would assist in urban regeneration.
- 8.61 The land to the south of the River Ash is predominantly flat and open in character and whilst there is some development in the north side of the site it is still considered to have the characteristic of openness to a substantial degree. Given the likely size of the proposed buildings along with new roadways, parking areas, landscaping and other associated development it is considered that the proposal would significantly harm the openness of the Green Belt both visually and spatially, particularly in the south and western parts of the site.
- 8.62 With regards to terms of opportunities to enhance the beneficial use of land within the Green Belt, officers consider that the proposal would have some benefit to the provision of access and outdoor recreation through the improvements to the River Ash corridor. Due to the area and likely scale and appearance of the proposed development, officers consider that the proposal would have a harmful impact on the existing Green Belt land and its wider landscape qualities. The impact on biodiversity is discussed further in the planning considerations below and is considered to be neutral also in Green Belt terms, and would therefore not constitute a significant benefit. The proposal does not affect damaged or derelict land and it is therefore not considered that the opportunity to improve such land is relevant in this case.

9. Traffic Generation

- 9.1 Submission document 12b: Transport Assessment seeks to provide a robust assessment of transport and highway implications of the proposed development, focussing on three key transport tests set out in paragraph 108 of the NPPF. This also includes an addendum dated 14 November 2018.
- 9.2 The applicant considers that the site is well located with respect to existing pedestrian and cycle networks and public transport services which provide opportunities for travel by non-car modes.
- 9.3 Access from both Shepperton and Staines railway stations is supported by a shuttlebus service provided by Shepperton Studios Ltd (SSL). The studios are located some 1.9km from Shepperton rail station and 3.9km from Staines-upon-Thames rail station (as the crow flies) which significantly exceeds a comfortable walk. Whilst the Studios operates a shuttle bus service to both stations, the frequency is currently 5 times to Staines station between 7am-10am and 7 times between 3pm-7pm and 2 times to Shepperton station between 7:40 am-8:40am and once at 5:40pm via Staines station.
- 9.4 A new main access on the B376 Shepperton Road is proposed, incorporating a roundabout based on the one at Pinewood. The site would retain an access on Studios Road for the existing Studio facilities and would incorporate the realignment of Studios Road and reconfiguration of the existing Studios access.
- 9.5 The access arrangements proposed by the TA have been designed in accordance with current design standards and guidance and have been robustly tested in terms of highway capacity.
- 9.6 Whilst the TA acknowledges that the car parking is a reserved matter, it confirms that it is proposed to increase the parking levels within the site from 1,034 spaces to 2,575 spaces. The applicant's assessment of the proposed parking provision demonstrates that this level of parking should be adequate for the estimated parking demands.
- 9.7 The traffic impact of the proposed development has been robustly tested using an approach and parameters agreed in discussion with Surrey County Council.
- 9.8 Given the operational requirements of Shepperton Studios, the TA uses an 'average operational day' and a '90th percentile operational day' (i.e. a busier day) as a sensitivity test.
- 9.9 The traffic capacity analysis has been undertaken for an assessment year of 2023 and allows for background traffic growth and local development commitments.
- 9.10 In terms of traffic capacity during construction, the TA identifies that construction traffic would be small in comparison to the operational movements and therefore any impacts would be minimal with little effect on the operation of the highway network.
- 9.11 The applicant believes that the proposal would introduce local highway improvements that either resolve or significantly improve existing conditions and is therefore beneficial in traffic impact terms.

Review

- 9.12 The proposal is an outline application with all matters reserved, therefore a reserved matters application would be required in connection with the means of access and the internal site roadways.
- 9.13 The County Highway Authority has reviewed the Transport Assessment.
- 9.14 The Transport Assessment submitted as part of the application has used 'Gatehouse' data and traffic data collected by Automatic Traffic Counters to predict the number of vehicle movements that would be generated by the proposed development. Due to the high security nature of the site use, comprehensive data on the number of people on site is available for each day. This has been used to gauge how busy the site was, relative to the rest of the year, on the day of the traffic surveys. From this, a calculation has been made to estimate the average number of vehicular movements to the existing site, and the expected vehicular movements on a 90th percentile day (i.e. a busy day where only 10% of days are expected to exceed that level of trips). The County Highway Authority has requested that the 90th percentile calculations be used to provide a robust assessment of the impact the site would have when it operates close to capacity. The majority of days are expected to have significantly less impact on the local highway network.
- 9.15 As the proposed site use will have a very similar ratio of sound stage/ workshop/ office space, the existing trip generation estimates have been scaled up to the proposed floor space volumes. The County Highway Authority believes this approach to estimating trip generation of the proposed development is suitable, and proves a robust assessment.
- 9.16 The following tables show the average day and 90th percentile day trip generation estimates for both the existing and proposed site uses. These tables show that, within the peak hours at the beginning and end of the normal working day, the proposed development will increase the number of movements to and from the development significantly. These movements will be fairly tidal, with the majority of the trips in the AM peak hours made up by arrivals at the site, and the majority in the PM peak hours made up of departures.

Average Day	07:00 – 08:00	17:45 -18:45
Existing	441	393
Proposed	972	869
Net Change	531	476

Figure 3: Average day trip generation

90 th Percentile Day	07:00 – 08:00	17:45 -18:45
Existing	631	563
Proposed	1,391	1,242
Net Change	760	679

Figure 4: 90th percentile day trip generation

- 9.17 The County Highway Authority is satisfied that the trip generation estimates provided are robust and, given the junction modelling and mitigation

measures set out below, that the estimated traffic volumes can be safely accommodated on the local highway network without causing material capacity issues.

Junction Modelling, Mitigation Schemes and Traffic Impact

- 9.18 A number of key local junctions have been modelled to determine what impact the development may have across the network. The junctions most likely to be impacted by the development were identified in scoping discussions between the developer and SCC. The modelled distribution of traffic has shown that development traffic is unlikely to have a significant impact on any further junctions, and therefore further modelling has not been requested by SCC. However, it is understood that some additional modelling was carried out at the request of Highways England on the Strategic Road Network.
- 9.19 In order to provide a robust assessment of the potential impacts, the developer has, at the request of SCC, run the models with the level of traffic expected on a 90th percentile day. In the following summary, the 90th percentile day is referred to as a “busy day” at the studios.
- 9.20 Where the traffic modelling has shown that particular junctions will be significantly impacted by additional traffic, mitigation schemes have been proposed. All proposed mitigation measures have been subject to a Stage 1 Road Safety Audit, and are recommended by the County Highway Authority.
- 9.21 In the following summary, junction capacity is defined as the maximum flow of traffic that the junction can accommodate without continuous queuing (i.e., queuing that does not form and then dissipate before additional traffic joins). Where a junction is considered at or above capacity, one or more arms of the junction is expected to experience continuous queuing in the peak hour.
- 9.22 A number of ‘Compact Roundabout’ schemes have been proposed in the mitigation package. A Compact Roundabout is defined as a roundabout with “single lane entries and exits on each arm. The width of the circulatory carriageway is such that it is not possible for two cars to pass one another” (Design Manual for Roads and Bridges, TD 16/07). Compact roundabouts have a central island, as with a normal roundabout. The proposed compact roundabouts feature a central overrun area to facilitate movements by larger vehicles.

Relocated Studios Road Site Access

- 9.23 The existing access from Studios Road into the site is to be relocated to the west. This junction would operate well within capacity and neither the highway works nor the development traffic would have an impact on the highway.

Existing Studios Road Car Park Access

- 9.24 The existing access to the Car Park off Studios Road would be retained. Without development, the access junction would remain under capacity on both Studios Road and from the access. With development, the junction would remain within capacity. A higher delay would likely be experienced in the peak hour for drivers exiting the car park, but any resultant queue would be within the car park not on the public highway. It is unlikely that the estimated delay would be sufficient to encourage drivers to park on the highway to avoid queuing to get out of the car park. If this were the case,

parking restrictions could be implemented on Studios Road as part of a parking review that the applicant would be required to undertake and fund.

Proposed Shepperton Road Site Access

- 9.25 As part of the development it is proposed to provide a new main entrance to the site from a new roundabout on Shepperton Road. This would be located at the existing Laleham Nurseries Access. The introduction of the roundabout will delay non-studios traffic traveling on Shepperton Road, however the delays and queue lengths are likely to be minimal even on busy days at the Studios. Even in the morning peak – where traffic is worst effected - the maximum expected delay for any driver is unlikely to exceed 10 seconds, and will be significantly less on 2 of the three arms of the junction.

Studios Estate / Studios Road Junction

- 9.26 As a result of the proposed extension to Studios Road (the extension to remain private), a new junction would be required with the Studios Estate. The extension to Studios Road would have priority, and the Studios Estate would be required to give way. This junction would operate well within capacity, and drivers exiting the Studios Estate would not experience any significant delay. A raised table is proposed at this junction, which will help pedestrians cross, and also slow vehicles down. Some residents have previously expressed concern with the speed that vehicles take the existing sweeping curve into the Studios Estate.

Studios Road / New Road / Squires Bridge Road

- 9.27 The existing junction between Studios Road, New Road and Squires Bridge Road is a simple priority T-junction, with Studios Road giving way. Without development, the junction would be expected to operate within capacity on most days in 2023, although lack of acceptable gaps in the traffic do result in delay for drivers turning in and out of Studios Road in both peak hours. This is particularly noticeable in the 'busy day' scenarios. These issues are accentuated by the additional traffic generated by the development, to the extent that the junction would operate over capacity.
- 9.28 As a result, a mitigation scheme has been proposed involving the creation of a roundabout. On a busy day at Shepperton Studios, the proposed roundabout is likely to operate just within capacity. In the morning peak, the submitted modelling shows a delay of 24 seconds and a queue of 8 vehicles on the New Road Arm. The model also shows a delay of approximately 18 seconds on the Squires Bridge Road arm. Northbound drivers on Squires Bridge Road would experience some additional delay, as their route is currently uncontrolled by any other traffic. Southbound drivers on New Road will also experience some additional delay, but on busy days at the Studios without development, the right turn lane into Studios Road is likely to occasionally block, resulting in some delay.
- 9.29 Overall, the proposed roundabout and development traffic at this junction would not have a significant impact on road users, and would balance capacity across the three arms of the junction. A small amount of delay would occur in the peak hours on busy days, but for the majority of the time the junction would be unlikely to create queues or significant delays.

- 9.30 An added benefit of the proposed roundabout is that it will contribute to slowing traffic down, in a location where some residents have raised concerns regarding excessive speed, particularly in proximity of Littleton School.

Charlton Road/ Charlton Lane/ New Road

- 9.31 This junction is already significantly over capacity on the Charlton Lane arm, and both observations of the junction's operation and the model of the existing junction show significant queuing in both the morning and the evening peaks, particularly in the right-turn lane. This is expected to get significantly worse by 2023 even without development, with increased demand on both Charlton Lane and Charlton Road/ New Road.
- 9.32 The proposed mitigation package at this junction is a roundabout. This would make a significant improvement to the overall capacity of the junction, and all arms show to be within capacity in the modelling. In the morning peak on a busy day at the studios, the Charlton Road arm has a Ratio Flow Capacity (RFC) of 0.94, where capacity is 1 and the recommended ratio is 0.85. In the evening peak, the New Road arm also has a RFC of 0.94. Whilst these ratios are higher than the desirable level, the operation of the junction overall would be an improvement when set against the existing junction. It is also noted that these figures relate to the peak hours of particularly busy days. On 90% of days, the peak periods will not have RFC values as high as 0.94, and on almost all days the hours outside the peaks will also have significantly lower values.

B376 Laleham Road / Fairview Drive / Squires Bridge Road

- 9.33 The existing junction is at or very close to full capacity. By 2023 it is estimated that, without any development, the junction would tip slightly over capacity in the peak periods.
- 9.34 The proposed development, and the proposed new access from Shepperton Road would remove some existing trips from the Laleham Road/ Fairview Drive/ Squires Bridge Road junction, as drivers accessing the site from the south via Littleton Lane, and from the east via Shepperton Road will no longer need to access the site from Studios Road. It has been confirmed that both accesses will be available to all regular employees, and they will be permitted and able to use whichever access they encounter first.
- 9.35 However, the development would still be likely to result in additional traffic over this junction, pushing it further over capacity. As a result, a scheme involving the replacement of the mini-roundabout with a compact roundabout has been proposed. The proposed design does not fully meet design standards in terms of deflection on all arms of the junction, but would be better than the existing mini-roundabout where almost no deflection exists on three of the four arms. With the proposed mitigation scheme, the "With development" scenario would result in a decrease in delay and queuing at the junction on all arms in the peak hours, and is considered to be a good overall improvement.

Laleham Road / Littleton Lane / B376 Shepperton Road / Existing Service Access

- 9.36 Without development, it is likely that the existing compact-roundabout will be approaching capacity in the AM peak by 2023. When adding development

traffic to this junction, particularly on a 'busy' day at the Studios, the existing junction would likely run over capacity in both peak periods.

- 9.37 As a result, a reconfigured compact roundabout scheme has been proposed. The proposed roundabout would increase capacity at the junction, to an extent that the junction would operate with only minor delays commensurate with the delays in the 'No Development' scenario. Travel times through this junction are therefore unlikely to be negatively impacted by the development.

B375 Chertsey Road / B375 Chertsey Bridge Road / Littleton Lane

- 9.38 The proposed development would result in a slight increase in delay at this junction, but all arms would remain within capacity. The impact on the junction is not likely to be significant.

B375 Bridge Road / Weir Road

- 9.39 The existing junction currently operates close to capacity in the peak periods, with noticeable delays on all arms. This is likely to worsen by 2023, with the junction tipping over capacity due to estimated traffic growth. The proposed development would add a significant number of trips to the junction in the peak periods, particularly in the PM peak. A mitigation scheme has therefore been proposed for the junction.
- 9.40 The proposed scheme is to widen the three lanes on the eastern arm of the junction by reducing the width of the adjacent footway on the south side of Bridge Road. The existing lanes are particularly narrow, and the proposed widening would be expected to increase capacity to a level whereby the junction would operate with less delay than in the 'No Development' scenario in the AM peak, and comparable delay in the PM Peak. The development would, therefore, be unlikely to have a material negative impact on travel times through the junction. This scheme would, however, result in the narrowing of the footway and reduction in space available to pedestrians. The resultant width is a minimum of 1.8m, which is adequate to facilitate the level of pedestrian movement on this stretch of footway.

B376 The Broadway / B376 Staines Road

- 9.41 The existing layout of this junction is a poorly set out mini-roundabout that is expected to tip over capacity on all arms in the PM peak by 2023 without development. The development would increase the number of movements through the junction significantly in the peak periods. The proposed mitigation at this junction involves the formation of a compact roundabout to replace the existing mini.
- 9.42 Given the relocation of the main access to The Studios from Studios Road to Shepperton Road, the most direct route from the M25/A30/ A308 is via Ashford Road through Laleham. If all vehicles were to take the most direct route to the site via this route on a busy day at the studios, the junction would operate at capacity on the Northern arm in the morning peak, producing a queue and some delay. In the evening peak, the southern arm of the junction would be comfortably over capacity, and queues and delay may be significant, although this is difficult to quantify. In practice, where significant congestion does occur, regular visitors or staff at the site would be likely to explore alternative routes. It is likely that, in the event of regular delays, drivers would instead opt to drive via Charlton – a scenario which has been modelled by the applicant. The route via Charlton has sufficient capacity to

facilitate and encourage this. As a result, PM Peak delay on the southern arm of the Broadway/ Staines Road junction is likely to be reduced. Overall, the development with the proposed mitigation scenario would likely improve all arms of the junction for the majority of the day, with the exception of the southern arm in the evening peak.

- 9.43 A condition has been recommended, and agreed by the applicant, to carry out traffic monitoring following the construction of the site. A financial contribution would be secured as part of the Section 106 agreement towards the implementation of a signage strategy to direct traffic to a route with more capacity if significant congestion occurs. Promoting routing via roads and junctions with available capacity can also be promoted through the travel plan and the Studios website.

Spelthorne Lane/ Charlton Road/ Ashford Road

- 9.44 Without development, the existing mini-roundabout at this junction will operate slightly over capacity in both AM and PM peak hours. The proposed mitigation at this junction involves the replacement of the mini roundabout with a signalised junction. The signalised arrangement would also result in the banning of right turns from Spelthorne Lane into Ashford Road, and of left turns from Ashford Road into Spelthorne Lane.
- 9.45 The result of the Development and mitigation scheme is an improvement in capacity on most arms of the junction. The Charlton Road arm of the junction will experience a very slight increase in delay, but Spelthorne Lane and Ashford Road arms will likely experience a decreased delay against the predicted 2023 flows. All arms are estimated to be within capacity.
- 9.46 The impact of the banned turns has been considered by the applicant. Traffic surveys show that the number of vehicles that currently undertake the movements that are proposed to be banned is in the region of 30 per hour. Demand for the banned turns can be diverted via Staines Road West (A308) and Littleton Road (C233), or for smaller vehicles via Littleton Road (D6260). This may result in a delay for some road users, and is expected to mainly impact the businesses based on the southern end of Ashford Road. There may also be a limited amenity impact on residents of Littleton Road (D6269), but as previously stated, the observed demand for the banned turns is low.

Pedestrian Improvements

- 9.47 The applicant has proposed two pedestrian crossing schemes in the vicinity of the site. The first of these schemes is an upgrade to the existing crossing on Shepperton Road, just south of Vicarage Lane in Laleham. The proposal involves turning the existing uncontrolled crossing into a zebra crossing (Drawing No. ITL14056). The second pedestrian crossing scheme is for a signalised crossing on Charlton Road in Charlton (Drawing No. TL14056-GA-027 B). Both of these schemes would give pedestrians priority over motorised traffic, and make it easier and safer to cross the road where increased traffic flows due to the development may reduce natural gaps in the traffic.

Phasing of Highway Improvements

- 9.48 The phasing of the proposed highway improvements is yet to be agreed. A phasing plan would need to be submitted to the Local Planning Authority detailing the schedule for the on-site construction works to take place. Trip

generation estimates for each phase of the development would then be calculated.

Parking

- 9.49 The proposal is an Outline application and parking would be considered at the reserved matter stage. Details of proposed parking levels have been provided as part of the application, however. Gatehouse and traffic surveys of arrivals and departures to the site has been used to estimate the existing parking demand on site on a 'busy' day at the Studios (85th percentile). This methodology is accepted by the CHA as the best estimate that can be achieved given the available data. It is estimated that, on an 85th percentile day at the studios, maximum parking demand will be approximately 2234.
- 9.50 A total of 2575 parking spaces are proposed, which would allow some additional parking demand to be facilitated. A limitation of estimating parking demand by using of the 85th percentile day is that parking demand may exceed the proposed supply on days where the site is fully in use. On these days, some of the additional parking is likely to be accommodated within the site on ad-hoc hard standing areas, as is currently the case. It is possible that on very busy days parking demand may overspill onto the adjacent highway. In order to address this concern, Parking Surveys will be conducted in the vicinity of the site following occupation of the proposed development, and the developer will be required to fund any parking restrictions subsequently deemed necessary by the County Highway Authority. It is also expected that the Travel Plan to be submitted to and agreed by the CHA will promote sustainable modes, discourage car use, and reduce parking demand.

Impact of Construction Traffic

- 9.51 The impact of construction traffic on the local highway network has not yet been considered in detail, as it cannot be meaningfully predicted until a phasing plan for on-site works has been agreed, and construction details confirmed. Some preliminary estimates have been made based on the construction traffic associated with the similar development at Pinewood Studios. From this, it has been suggested that on a peak week of construction traffic, the number of vehicle movements will be in the order of 180 per day. This will be reviewed when the phasing plans and construction methods of the development are agreed.
- 9.52 It is likely that vehicle movements of this magnitude can be accommodated within the highway network without causing capacity issues. When the phasing of development is agreed, the County Highway Authority will ensure that construction traffic volumes are factored in to decisions on trigger points for highway improvements to be delivered.
- 9.53 A condition has been recommended to require the developer to provide details of how construction traffic will be managed in order to minimise disruption to the highway network. This will include the agreement of appropriate vehicle routing.

Sustainable Travel

- 9.54 The site is not ideally located to promote travel by sustainable modes. Public bus services that run close to the site are infrequent, and Shepperton and Staines rail stations are 1.7 miles and 4 miles from the site respectively. The local highway network is not ideally suited to promoting cycling, as there is no

significant cycle infrastructure such as off-carriageway cycle lanes. The nature of the site use means that many staff work at the site for short to medium term periods, and are therefore less likely to live in the local area.

- 9.55 Notwithstanding the above, it is important that sustainable travel is encouraged as much as possible. An updated Travel Plan will be required for the development, and will be monitored to ensure targets are met. On-site cycle facilities have been requested by the CHA. Shepperton Studios operate an existing shuttle bus service, which goes between the site, Staines Rail Station, Shepperton Rail Station, and Pinewood Studios. This is an important resource, and is comfortably the most realistic alternative to private car use for most staff and visitors to the site. To ensure this service has capacity to cater for the increased number of people accessing the site following development, a planning obligation is required to improve the shuttle bus service. It should also be detailed how irregular visitors to the site will be granted access to the shuttle bus service and encouraged to use it.
- 9.56 Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN).
- 9.57 The SRN is a critical national asset Highways England is concerned with proposals that have the potential to impact on its safe and efficient operation. In this case, the M3 in particular Junction 1, M25 in particular J13 and the Crooked Billet Junction on the A30.
- 9.58 The LPA concludes that using the 90th percentile would provide a realistic levels of traffic generation, given the applicants assertions regarding the existing and anticipated levels of operation at the site. Therefore the junction modelling, with the proposed mitigation, would provide an overall improvement to the highway network.
- 9.59 The proposed pedestrian improvements would address local concerns regarding increased traffic movements arising from the development and social perceptions regarding traffic levels.
- 9.60 The LPA is satisfied that the phasing of the proposed highway improvements could be achieved and that appropriate parking levels can be adequately achieved within the site through the Reserved Matters process.
- 9.61 Whilst it is recognised that the location of the site and scale and nature of the proposal is likely to result in a continued reliance on the private car, the applicant has presented a Travel Plan Framework which addresses improvements to the existing shuttlebus service, together with measures that would provide opportunities to achieve a modal shift.
- 9.62 It is considered that the assessment and review has clearly shown that there would be no conflict with paragraph 109 of the NPPF 2018 which states that development should only be refused on highway grounds if there would be an unacceptable impact on highway safety.

10. Loss of habitat

- 10.1 The applicant submitted document 14: Ecological Appraisal to support the outline planning application. The desk study and surveys has been used to

inform the applicant's assessment and identifies any adverse ecological impacts, necessary avoidance measures and mitigation.

- 10.2 The Phase 1 habitat survey was extended to consider the ability of the site to support notable or protected flora and fauna and to provide sheltering or foraging habitat and connectivity to allow population dispersal.
- 10.3 The assessment determined that the majority of the site is of negligible ecological value, although the River Ash corridor was identified as a notable ecological feature providing a habitat resource and connectivity to the wider area. However, it was also identified as lacking appropriate management and its potential is therefore not fulfilled.
- 10.4 It acknowledges that the bridge crossing over the River Ash and the internal roadway itself, would result in a localised, but permanent, loss of woodland and semi-improved grassland.
- 10.5 The Appraisal considers that the proposed habitat mitigation and enhancement would result in a significant increase in the extent and quality of woodland and scrub habitat and therefore the loss of the woodland would be mitigated. It also recognises that the loss of the semi-improved natural grassland cannot be fully mitigated, but considers that the new habitat areas are considered to outweigh this loss. In addition, existing habitats and features of importance for protected species would be retained and enhanced.
- 10.6 The assessment concludes that following the provision of mitigation and enhancement measures an overall benefit to ecology is predicted in the medium to long term.

Review

- 10.7 The Expansion Site includes a number of sites that have been worked for minerals and backfilled. Some areas were worked and restored a number of years ago, such as the land north of the River Ash and some more recently. The more recent land includes parts of the original Home Farm mineral permission area (land at Home Farm and Laleham Nurseries), permission SP90/0241 and SP06/0275, and the more recent extension area (Shepperton Studios and Laleham Nurseries land) permission SP09/0720.
- 10.8 The Shepperton Studios and Laleham Nurseries land was subject to a restoration plan (approved 2012) that sought to restore the land to high environmental standards.
- 10.9 Although the assessment concludes that the majority of land uses within the site are of negligible value, and that the overall ecological value is poor, it appears that no consideration has been afforded to the ability, or requirement, of the restoration plan to provide a high quality environment, despite the applicant having been made aware of this omission.
- 10.10 The Ecological Appraisal therefore refers to the current situation, after mineral extraction and with minimal environmental management, without including the ecological benefits that were required and promised through the restoration plan. The weight afforded to the applicant's assertion that the proposal would provide '*significant benefits for the site's ecology*' and '*contribute to providing a net gain for biodiversity*', must therefore be limited since the sites ecology would have been considerably improved had the restoration plan been implemented and the site managed effectively.

- 10.11 The River Ash corridor enclosed by the site is within the control of Shepperton Studios Ltd and Spelthorne Borough Council, therefore both organisations could control the *'inappropriate management'* and *'further reduction in the ecological value'* referred to in the Ecological Appraisal. However, although SBC recognises that management could be improved, it does not support the view that the existing management is inappropriate, rather that it is proportionate.
- 10.12 Although the applicant proposes to undertake works within the Council's corridor of ownership as part of the wider mitigation measures for the site and develop a management plan, this would comprise an initial capital investment and a 15 year management time period. Any wider impacts on the ecology of the site arising from the proposal would be permanent.
- 10.13 The loss of woodland caused by the proposed bridge and route of the internal roadway could be mitigated through woodland planning within the site as result of the Reserved Matters applications. The LPA would therefore agree that this loss could be appropriately mitigated
- 10.14 The applicant recognises that the loss of natural grassland cannot be fully mitigated, but smaller areas within the site could be provided at the Reserved Matters stage. However, given the additional loss of the grassland that would have been provided through the minerals restoration plan, the conclusion that there would be a net biodiversity gain is likely to be at risk of being overstated.
- 10.15 Although the assessment refers to mitigation measures and the Site Masterplan, this is an outline application with all matters reserved and the Masterplan is only illustrative, therefore both must be given only limited weight.
- 10.16 Natural England advises that they have no comments to make in respect of the application. However, this does not imply that there are no impacts on the natural environment, only that the proposal is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes.
- 10.17 Surrey Wildlife Trust has made comments on the ecological aspect of the application and recommend that the recommended actions and biodiversity enhancements in section 5 of the Ecological Appraisal should be implemented.
- 10.18 The Trust also recognises that there are opportunities to restore and enhance biodiversity across the site and recommend that a Landscape and Ecological Management Plan be required to help ensure that the biodiversity value of the site appropriately mitigated and the proposed enhancements are appropriately managed and monitored. This has been required at Condition X
- 10.19 A Habitats Regulations Assessment screening was undertaken which concluded that, in consultation with Natural England, the proposed development is not likely to have a significant effect on the ecological integrity of the South West London Waterbodies SPA, Windsor Forest & Great Park SAC, Thames Basin Heaths SPA or Thursley, Ash, Pirbright & Chobham SAC alone, or in combination with other plans or projects.
- 10.20 Therefore pursuant to Article 6(3) of the habitat Directive (Council Directive 92/43/EEC) and Regulation 63(a) of the Conservation of Habitats & Species Regulations 2017, an appropriate assessment is not required before the application for planning permission can be determined.

10.21 It is concluded that although there is a risk in stating that the proposal would result in a net biodiversity gain, it does incorporate the opportunity to improve biodiversity within the site, and the River Ash Corridor in particular. Limited weight is therefore given to the benefits of biodiversity enhancement as a result of the proposal.

11. Visual Impact

- 11.1 The applicant submitted document 15: Landscape and Visual Appraisal with the application which attempts to assess the potential effects resulting from the proposal. This has been derived through the establishment of a baseline situation and the likely effects of the development on this baseline.
- 11.2 The appraisal has sought to assess the effects during construction and through years 1 to 10 of the operational stage. It has also assumed the maximum parameters and full extent of the proposal thereby assessing the 'worst case scenario'.
- 11.3 The assessment indicates that the site is a restored landscape of medium-scale fields, under arable cultivation, with few characteristics of the original River Ash floodplain and is influenced by the surrounding urban conurbation. With the exception of the River Ash corridor and an area of ancient woodland which are considered to be in poor condition there is little to confer landscape value.
- 11.4 The assessment concludes that moderate effects on landscape character would be limited to the site itself in the construction phase where adverse impacts would arise from the construction activity. These impacts are identified as being temporary and reversible in short views and areas of limited vegetation.
- 11.5 At the operational phase, the anticipated level of effect would reduce to minor. The development would represent a change in character and use on the site, albeit in a context of an urban edge location where the existing built form of the Studios forms a feature of the existing view. The limited visibility of the site and the scale of the development in comparison with the baseline would also limit indirect effects on landscape character.
- 11.6 Visual impact is determined to be restricted to 1km from the site as a result of vegetation and topography, with long distance views constrained by the surrounding urban settlements. The assessment further determines that embedded landscape mitigation would further filter these views.
- 11.7 Views of the development are considered to be localised with most locations being sufficiently distant that the proposed development would not be visible or largely indiscernible.
- 11.8 Despite the flat nature of the local topography and limited tree cover, the lack of an extensive Rights of Way network means that areas with potential visibility are not publicly accessible.
- 11.9 Based on the maximum parameters of the proposal, the assessment determines that only the upper elements of the development would protrude above the height of mitigation vegetation at year 10.

- 11.10 The assessment further states (s2.29) that the proposed development is not likely to be so overbearing or dominating, when experienced from any individual property, as to result in unacceptable living conditions.
- 11.11 The assessment states that the proposed development would not entail any large scale loss of landscape elements other than farmland, therefore changes to the visual amenity would relate to temporary visibility of construction activity and permanent views of the resultant built form.
- 11.12 The assessment concludes that the proposed development would have a moderate effect on the landscape character of the application site during construction reducing to minor during the operational stage by virtue of the baseline context. Overall the effect of the proposed development on the landscape character of the application site would be moderate. The effects on the wider character of the floodplain are judged to be minor, reflecting the localised nature of the changes.
- 11.13 In terms of visual amenity, the assessment uses Zones of Theoretical Visibility (ZTV) which is a computer generated tool to identify the likely, or theoretical, extent of visibility of a development. The elevations of the development, in this case the maximum parameters, are tested against a 3D terrain model.
- 11.14 The ZTV's indicate that views are available from large swaths of the study area 2km from the site boundary, however the effects of the site's low-lying land form dictates that views in close proximity have the greatest impact. The visual effects are deemed to reduce from moderate to minor in year 1 of the operational phase and minor/negligible as the landscaping matures.
- 11.15 The assessment acknowledges that, with the exception of the existing Studios site, the applications site is located within the Green Belt. However, it is stated that this designation seeks to maintain openness between settlements rather than being an indication of landscape quality.

Review

- 11.16 The landscape character of the site is generally accepted, although no acknowledgement of the mineral working restoration plans is made. However, it is considered that the landscape value in this case is conferred by the openness of the landform and agricultural characteristics.
- 11.17 It is however acknowledged that the site is not located within a designated landscape.
- 11.18 During the construction phase it is considered that the moderate effects would extend beyond the site by virtue of the views into the site and the reduction in the openness of the wider area, particularly between Littleton and Laleham.
- 11.19 Whilst the construction activity may be temporary, in that it will eventually transform into operational activity in the future, it is not consider it to be reversible in simple terms.
- 11.20 At the operation stage the change in character and use of the site would be significantly different from the existing position, and permanent. Although the impact on the wider landscape typology may be considered limited, the community level in which the landscape has significant value would be adversely impacted.

- 11.21 Notwithstanding that this is an outline application with all matters reserved, including landscape, the submission indicates screening on the western boundary using a planted 5.5m bund. This is used by the Assessment to mitigate the community view into the site. However, bunding is not characteristic of this area and the effect of this type of enclosure would be to restrict the views across the field pattern.
- 11.22 Further erosion of the semi-rural character of the landscape would arise as a result of the landscaping no longer relating to an agriculturally dominant landscape, but to significant urban development. The views in which the development would be seen would be perceived as having the character and appearance of a business park, in stark contrast to the existing primarily undeveloped landscape.
- 11.23 The conclusion that the views would be minor, or minor/negligible, reflects an over-emphasis on negative features of the landscape and the community level value and under plays the open views and agricultural dominance.
- 11.24 It is therefore concluded that the visual impact would be adverse during construction and moderate during the operational phase, assuming an adequate level of mitigation is secured and maintained, through Reserved Matters applications. The proposal therefore represents visual harm to the landscape which must be weighed against any other considerations in favour of the application.

12. Impact on the Historic Environment

- 12.1 The submitted document 17: Heritage Statement seeks to provide a proportionate understanding of the significance of the heritage assets that may be affected by the proposal.
- 12.2 Whilst there are statutorily listed buildings in the vicinity of the Studios site, those of primary significance are the Church of St Mary Magdalene and the locally listed Littleton House. The assessment states that there are no formally identified heritage assets within the Studios site, the expansion site or the local context that have not been assessed.
- 12.3 In respect of the Church, the assessment finds that its historic interest is derived from it being a building of medieval origins and fabric and the oldest remaining built element within the former historic settlement of Littleton. It remains in its original use and has a degree of communal interest from this, as well as being associated with notable local families.
- 12.4 The church is now experienced as part of a varied and strongly contrasting context. The extensive and ongoing development and redevelopment of Shepperton Studios has had a transformational impact on the setting of the church, which is no longer appreciated or understood as being located on the edge of a polite landscape associated with Littleton House.
- 12.5 The erection of a variety of substantial buildings to facilitate the operational use of the Studios has severed any meaningful visual links both to and from Littleton House. The extent and proximity of buildings of contrasting scale and character is often dramatic and discordant. The existing redundant and semi derelict car park structure is notable in terms of its unrelieved, utilitarian and monolithic character and creates unattractive prospects from the churchyard.

- 12.6 The assessment finds that in these terms, Shepperton Studio does not contribute positively to the special interest of the Church, and some of the structures within the site detract from an appreciation of its particular heritage significance. However, it also argues that in overall terms, the setting of the Church makes a comparatively minor contribution to the special interest of the LB and is not sensitive to change.
- 12.7 In respect of Littleton House the formerly extensive designed grounds and rural context have been eroded to a large extent following construction of the studio facilities. The facilities are identified as having adversely impacted on the ability to understand its local heritage significance and whilst positive elements of the historic setting do remain, it is generally in a fragmentary and altered condition.
- 12.8 The construction and resultant spaces around Littleton House have resulted in a strong contrasts in scale, character and materiality between the locally listed building and the studio facilities.
- 12.9 The assessment concludes that the proposal would have an impact on the significance of the heritage assets as a result of changes to their settings. However since these settings have been significantly altered through the twentieth century, they do not contribute strongly to the historic significance and are not sensitive to change.

Review

- 12.10 The NPPF (para 194) states that any harm to, or loss of, significance of a designated heritage asset should require clear and convincing justification. It notes that substantial harm to a Grade I designated heritage assets should be wholly exceptional.
- 12.11 The Church of St Mary Magdalene is a Grade 1 Listed Building which represents a very small percentage of Listed Buildings, which in turn represents an exceptionally small percentage of the UK's total building stock.
- 12.12 The Heritage Assessment acknowledges the impact that development at the Studios has had on the Church since the early twentieth century and arguably this impact has occurred over a relatively short period of the Church's life.
- 12.13 Whilst it is agreed that the proposal represents a significant change to the setting of the Church, as stated in the assessment, the suggestion that the setting represents a comparatively limited contribution and is not sensitive to further change is not supported.
- 12.14 It is considered that the proposal represents a significant change to the setting of the Church and this represents harm to the significance of the designated heritage asset.
- 12.15 The original height parameter of 15.5m which is not reflected in the proposed sections of the 'illustrative scheme' shown in the Design and Access Statement, would exceed the existing development on site, which the applicant acknowledges impacts the Church, and could result in a building that exceeds the Church's tower height.
- 12.16 The revisions of the height parameter adjacent to the Church to 7m would allow a stepping of the built form, which together with applicant's recognition that particular care would be required to minimise and mitigate the strength of

contrast and impacts on the significance of the listed building would mitigate the harm to the setting of the Church.

- 12.17 The assessment acknowledges that there is an opportunity via comprehensive redevelopment to deliver a more considered relationship between built form and the relevant heritage asset through relative disposition and improved design quality. This would be considered by the LPA during the Reserved Matters submissions.
- 12.18 In respect of Littleton House it is acknowledged that the building is not statutorily listed and its value as heritage asset must be reflected accordingly. Whilst it is also recognised that some of the adjacent buildings may be retained, it is unfortunate that the Heritage Assessment does not acknowledge the importance of Littleton House in the contribution that Shepperton Studios makes as set out in document 6: The Case for Space.
- 12.19 However, the assessment does recognise that there is an opportunity to deliver a more considered relationship between the built form and Littleton House through both the relative disposition and improved design quality of buildings. This would be considered through the Reserved Matters applications.
- 12.20 It is considered that the value of the heritage asset has been understated with an over-emphasis on the negative features of the twentieth century. The intrinsic historic value of both buildings and the opportunities to improve both of their settings has been underplayed. However, the NPPF indicates that a balance should be sought and the parameters provided for this Outline Application would allow the LPA to further review the impact at the Reserved Matters stage.
- 12.21 The Heritage Statement does not refer to Laleham Conservation Area as being a heritage asset in the context of the proposal. Laleham Conservation Area is some 0.75km from the expansion site and would have an impact on the views out of the Conservation Area by virtue of the size, height and scale of the proposed soundstages, albeit mitigated to some degree by any proposed planting on the western boundary submitted through a Reserved Matters application. Increased traffic through Laleham, derived from the development, has been raised in the consultation responses and would have an impact. However, a general increase in traffic must be acknowledged even without the development and the harm to the character of the Conservation Area from traffic in connection with Shepperton Studios would not be considered significant.
- 12.22 It is concluded that the proposal would represent harm to the setting of the Church, although this would be less than substantial harm to the significance of the heritage asset, but that a clear and convincing justification could be made at the Reserved Matters stage in respect of a more considered relationship between built form and the Church, the relative disposition of built form and improved design quality. It is considered that, in accordance with the test set out at paragraph 196 of the NPPF, the public benefits of the proposal would outweigh the harm identified to the significance of the heritage asset.
- 12.23 There would be harm to the setting of Littleton House, but as a non-designated heritage asset, the scale of harm and loss of significance would be minimal and no significant weight should be afforded to it. There would also be some impact on the setting of the Laleham Conservation Area, but

because of the context this would be less than significant and because of the public benefits brought by the proposal, only very limited weight could be afforded to this.

- 12.24 The level of harm to the historic assets in association with the current proposal is considered to be less than significant and when weighed against the public benefits identified in this report would be clearly outweighed.

13. Flooding

- 13.1 The submitted document 11: Environment Statement addresses hydrology and flood risk at chapter 9. The main sources of information used in the assessment is flood risk data from the Environment Agency, the Council and Surrey County Council in their role as the Lead Local Flood Authority.
- 13.2 As part of the Flood Risk Assessment (FRA) the existing hydraulic modelling for the site has been updated in order to determine the potential risk posed by the latest climate change guidance together with representative ground level information.
- 13.3 The assessment identifies both potential hydrology and flood risk impacts and considers that the proposal has been designed to ensure that all potential effects are avoided, reduced or offset by proposed mitigation measures.
- 13.4 Although the Environment Agency (EA) initially objected to the proposal based on the applicant's modelling to demonstrate that the site was not at risk of flooding, the applicant supplied a Supplementary Flood Risk Note which used the EA's 2009 levels for modelling purposes.
- 13.5 The Supplementary Flood Risk Note concluded that the assessment for compensation requirements using the 2009 modelling and 2009 ground level data represents a precautionary and worst case approach and provides a level of confidence that the proposed scheme is both realistic and deliverable. The analysis further shows that the required flood compensation provision could be provided and secured through planning conditions.
- 13.6 It also indicates that once the EA 2018 model is released and updated to surveyed restored ground levels within the site, the flood risk has been shown to reduce.

Review

- 13.7 Representations were received concerning the flood risk created by the significant development of structures and hardstanding on the site and this was supported by photographic evidence of standing water on the existing Laleham Nurseries site.
- 13.8 The EA is satisfied that the Supplementary Flood Risk Note demonstrates that lost floodplain storage as a result of the proposed development can be mitigated through the provision of compensatory flood storage within the site boundary and has removed their initial objection subject to conditions.
- 13.9 The Lead Local Flood Authority reviewed the surface water drainage strategy and is satisfied that the proposed drainage scheme meets the requirements set out in the NPPF, its accompanying PPG and Technical Standards.
- 13.10 Thames Water raised no objections to the proposal based on the information provided.

13.11 In accordance with the National Planning Policy Framework paragraph 158, the LPA is satisfied that there are no reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding within the Borough.

13.12 It is concluded that that flood risk should be attributed no significant weight in the planning balance.

14. Air Quality

14.1 The submitted document 11: Environmental Statement seeks to address air quality at chapter 8. This chapter assesses the impacts from operational traffic movements, construction traffic and construction dust against National Air Quality Objectives.

14.2 The assessment acknowledges that the site is located within the Borough wide Air Quality Management Area (AQMA) declared as a result of elevated NO₂ levels.

14.3 The assessment concludes that construction activities would have the potential to affect local air quality, particularly in respect of dust and has classified the impact as high. As a result the applicant has identified mitigation measures considered highly recommended or desirable by the Institute of Air Quality Management which would be incorporated into a Dust Mitigation Plan. (required at condition 22).⁴³

14.4 In addition pollutant emissions from construction traffic are considered to be negligible on local receptors and assuming UK vehicle fleet improvements are made by 2020 as predicted, then NO₂ concentrations are predicted to be lower than the 2016 baseline.

14.5 In terms of the operational phase, it is predicted that unmitigated impacts from the increase traffic may have a 'slight' impact at New Road and Charlton Road if emissions from the UK vehicle fleet do not improve.

14.6 On the basis that the proposed development would increase vehicle numbers and annual NO₂ levels, mitigation is recommended through the implementation of a Travel Plan and this would be provided through the s106 Agreement.

Review

14.7 The Air Quality Assessment has used 2016 as the base year for the assessment. Local air quality at the application site is well below the national air quality objectives for both annual mean nitrogen dioxide and particulate levels. However, monitoring by the Council in 2016 demonstrated that roadside levels on the vehicular approaches to the application site were in exceedance of the annual mean nitrogen dioxide national air quality objective.

14.8 In the air quality assessment the operational flows are based on a date of 2031, although it is not clearly stated why this date has been selected. Phased demolition and construction will lead to increased traffic flows to the development prior to that date. Further the construction traffic flows have only been considered to 2020 and junction capacity assessments were done for 2023. Assessing for such a far removed operational date can diminish the significance and relevance of the findings.

- 14.9 Mitigation is offered against the highways impacts including a construction traffic management plan (CTMP), a package of five local highway improvements, and a Travel Plan. The highways assessment concludes that the bringing forward of local highway improvements will be such that the highway network will operate with reduced queuing and delay 'with development' over the 'without development' scenario, and thus the development would be beneficial in traffic impact terms.
- 14.10 The applicant has identified a number of sensitive receptors (location points within the local area, such as ones where there are residential properties and relatively sensitive habitats) to form the basis of the construction dust risk assessment and set out the construction impacts for each receptor. The construction phase dust risk assessment concludes that the impact is high for receptors CR1 & CR2 for earthworks and construction; and for receptors CR5, CR6 and CR10 for track-out. The construction phase assessment receptors (CR1 to CR21) are different to the operational receptors (R1 to R20). There is no plan for their location in Chapter 8 (Air Quality) of the Environmental Statement nor in the Air Quality Appendix. Hence it is unknown where these receptor locations are, and thus impossible to review the findings of the assessment and proposed mitigation. Conditions relating to the construction phase have been imposed to address this oversight.
- 14.11 Whilst the transport assessment concludes that there will be an improvement in local highway operations in the 'with development' scenario over the 'without development' scenario, this is not the case for the air quality assessment. The later has predicted, due to the increase in traffic movements associated with the development, that:
- During the construction phase annual mean nitrogen dioxide concentrations are predicted to increase by up to $0.29 \mu\text{g}/\text{m}^3$;
 - During full operation of the development in 2031 the annual mean nitrogen dioxide levels are predicted to increase at nearby receptors by up to $2.19 \mu\text{g}/\text{m}^3$ from 2016 levels;
 - During full operation of the development in 2031 the annual mean nitrogen dioxide levels further afield from the site are predicted to increase by up to $0.67 \mu\text{g}/\text{m}^3$ (i.e. >1.5% of the national air quality objective), at receptors in Charlton Village; and
 - For receptors at the Squires Bridge Road/ Laleham Road junction and in Charlton Village annual mean nitrogen dioxide levels in 2031 are predicted to be within 5-10% of the National Air Quality Objective
- 14.12 The assessment also modelled scenarios including predicted UK vehicle fleet emission improvements, which would show a reduction when compared to 2016 levels. However, such improvements have been forecast over the past 5-10 years without being realised, and whilst there is now more confidence in this happening, the developer cannot rely on this as mitigation of air quality impacts from this development.
- 14.13 Since this is an Outline application with all matters reserved, it is anticipated that air quality assessments would be provided with Reserved Matters applications so that the cumulative effect of the proposal can be assessed and any additional appropriate mitigation put in place.

14.14 It is concluded that the impacts of the proposed development on air quality can be mitigated and should be afforded no significant weight in the planning balance.

15. Contamination

15.1 Submission document 19: Geo-Environmental Desk Study seeks to provide a review of the associated environmental implications and sensitivity, with an initial qualitative assessment of the potential risks.

15.2 The desk study review identifies potential contamination sources on and off-site, including inert landfilling in zones 1 and 3 of the site, historic commercial/light industrial uses at Laleham Nurseries and the Studios site, and potential for asbestos containing materials in existing and historic building structures.

15.3 The assessed contamination risks to current and future users, construction workers, building materials and the environment are identified as low to moderate.

15.4 Intrusive ground investigation is recommended to investigate actual contamination levels, including soil and groundwater sampling and ground gas monitoring.

Review

15.5 The Geo-Environmental Desk Study has been reviewed and the approach adopted to assessing the likely contamination impact of the proposed expansion is reasonable and consistent with accepted practice.

15.6 In addition to a general contamination assessment, there are potential issues with developing on recently restored land, including potential settlement and differences in ground conditions across the site, ground gases and impacts on the hydrological regime.

15.7 On the basis of the information provided, the Council's Pollution Control Officer considers that ground investigation through specialist assessment, and remediation if necessary, is appropriate to ensure that the site is suitable for the proposed use, Therefore contamination conditions are considered appropriate as attached at Conditions 35 and 36.

15.8 It is concluded that potential contamination of the site can be mitigated and should be afforded no significant weight in the planning balance.

16. Noise and Disturbance

16.1 The applicant's submitted document 20: Planning Noise Report sets out details of the assessment method and the available guidance used to assess the acoustic impact of both the construction and operational phases on the neighbouring area.

16.2 Current noise levels have been established and the closest noise receptors have been identified, including the Studios estate, Magdalene Road and Cranwell Grove.

16.3 Although it is acknowledged by the applicant that external mechanical would likely be required, the report identifies maximum noise emission limits in accordance with BS4142:2014 guidance.

- 16.4 Construction and demolition works have been assessed as being below the 'medium effect' level in BS5228-1+A1:2014 and are considered unlikely to have a significant effect on the nearest identified noise receptors.
- 16.5 Operational noise levels are recognised as requiring assessment and possible mitigation to ensure that guidance noise levels are achieved and loss to residential amenity is avoided.

Review

- 16.6 The Planning Noise Report has been reviewed and the approach adopted to assessing the likely noise impact of the proposed expansion is reasonable and consistent with accepted practice.
- 16.7 Although representations have been received concerning noise disturbance to adjacent residential properties, the existing studio has been operating in this location since the 1930's and some level of noise and disturbance must be accepted.
- 16.8 Although modern sound stages require sound proofing, it is recognised that some of the existing stages are not sound proofed, the workshop areas are likely to create some noise during their occupation and some of the tenant uses may also create noise. However, in general, these uses would be considered light industrial, which in planning terms means they are suitable within a residential area.
- 16.9 This is an Outline Application with all matters reserved, Environmental Health – Noise would expect any Reserved Matters applications to include a noise report.
- 16.10 It is concluded that impacts from noise and disturbance can be mitigated and should be afforded no significant weight in the planning balance.

17. Environmental Impact Assessment

- 17.1 The submitted document 11: Environmental Statement considers the likely significance of environmental effects of the proposed development.
- 17.2 This section of the report deals with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017(as amended).
- 17.3 The ES considers the extent that any residual, significant effects are predicted to occur. In respect of transportation the ES determined that the effect of construction traffic on community severance, driver and pedestrian delay, highway safety and fear and intimidation of using Studios Road would be negligible. In respect of the operational phase, the residual effects would be similar with minor beneficial effects on delays and highway safety.
- 17.4 In respect of any residual effects resulting from hydrology, the ES considers that during construction phase there would be a minor adverse effect to water quality, flood risk and surface water drainage. During the operational phase there would be a negligible effect on water quality, a minor beneficial effect on the flooding regime and a negligible effect on site users River Ash the downstream catchment and surrounding area.
- 17.5 The ES concludes that no major adverse effects have been identified. Although minor adverse effects have been identified in relation to some

criteria concerning hydrology these are not significant and no adaptive mitigation measures are proposed.

Review

- 17.6 The Environmental Statement complies with the requirements set out in Regulation 18(3) (a) – (e) of the EIA Regulations 2017.
- 17.7 It is acknowledged that in respect of the construction phase, the location and context of the site would preclude community severance to any degree. The justification for the impact of construction traffic on driver and pedestrian delays being *de minimis* is not accepted as being sufficiently evidenced or realistic. However, the assessment shows that the additional traffic generated would not create any significant effects. The accident data shows that the increased traffic would not have significant impacts on accidents or highway safety. The level of additional traffic would not meet the criteria to show significant fear and intimidation of road users and pedestrians.
- 17.8 The applicant has proposed a Construction Traffic Management Plan secured through planning conditions to provide mitigation measures.
- 17.9 It is acknowledged that in respect of the operational, the location and context of the site would preclude community severance to any degree. The additional traffic would impact on driver and pedestrian delays at a number of junctions. The LPA does not accept that overall, without mitigation, the operational impact of the development would be minor adverse, since it would compound existing issues. However, the additional impact is likely to be moderate. The accident data shows that the increased traffic would not have significant impacts on accidents or highway safety. The level of additional traffic would not meet the criteria to show significant fear and intimidation of road users and pedestrians.
- 17.10 The TA identifies mitigation measures at 7 junctions in the area which would assist in highway capacity, however there will remain an adverse impact on the highway network.
- 17.11 In respect of significant effects resulting transportation issues as a result of the development, the LPA is satisfied that there will be none.
- 17.12 Several of the identified receptors show the risk from dust during groundworks and construction to be high, although 71% of receptors register low. However, overall the likely impact of pollutants on nearby receptors are predicted to be negligible.
- 17.13 The likely impacts associated with the operational phase of the development are predicted to be a maximum of 'slight' if improvements are not made to the UK's vehicle fleet.
- 17.14 Mitigation is proposed in the form of a Dust Management Plan for the construction phase and a Travel Plan in the operational phase which would be secured through planning conditions.
- 17.15 In respect of significant effects to air quality as result of the development, the LPA is satisfied that there would be none.
- 17.16 In respect of significant effects to hydrology resulting from the development, the LPA is satisfied that there are none.
- 17.17 Whilst the LPA has found that there are no significant impacts resulting from transport, air quality or hydrology issues in respect of the EIA Regulations

2017, each of these issues has been considered further within this report as part of the LPA's planning review.

18. Light Pollution

18.1 This is an Outline application with all matters reserved. Although the parameters plan PP.4 – Development Zones indicates general development areas, no details regarding the parking areas or buildings have been provided, and there is no lighting strategy provided at this time.

Review

18.2 Whilst the neighbour consultation has generated comments and objections based on light pollution and the impact of existing lighting on residential properties, the absence of building details and a lighting strategy means that these cannot be substantiated.

18.3 Lighting and its impact on surrounding properties would be considered during the Reserved Matters stage. A condition is also recommended to limit any impact lighting may have on the area.

18.4 It is concluded that the impact resulting from lighting can be adequately mitigated and should be afforded no significant weight in the planning balance.

19. Other Considerations

19.1 The applicant has identified 5 material considerations in their Planning Statement (Document 5, August 2018) to justify the proposed development within the Expansion Site, which they believe individually and cumulatively comprise very special circumstances:

- i) VSC1: Meeting Government policy ambition for growth in film and HETV inward investment
- ii) VSC2: Shepperton is a key strategic site and its expansion is essential if the ambition of Government is to be met: there is no alternative
- iii) VSC3: The economic benefits to the national, regional and local economy
- iv) VSC4: Community benefits
- v) VSC5: Other matters

19.2 The NPPF 2018 states that '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. The LPA has therefore weighed these other considerations below in respect of the balancing exercise.

Meeting Government policy ambition for growth in film and High-End Television (HETV) inward investment.

19.3 Submitted document 05: Planning Statement identifies that there is Government policy for major growth of the film and HETV.

19.4 The creative industries, which includes film, TV, music, fashion and design, arts, architecture advertising, video games and crafts, are recognised by

Government as an important and valuable sector to the UK economy and accounted for £92bn of Gross Value Added (GVA) in 2016. Film and High-end TV attracted over £2bn of inward investment to the UK in 2017.

- 19.5 In order for the UK to be able to position itself and capture a share of this prospering sector, the Government has made several strategic decisions over the past ten years to attract further inward investment. This included the implementation of “Creative Industries Tax Relief” which encouraged international production firms to the UK. However, the Government has recognised that additional facilities must be provided to allow for continued growth.
- 19.6 The applicant’s submitted document 09: The Economic Impact states that the tax relief, implemented in 2007 allows film companies to claim a rebate of up to 25% of the total amount spent on production. Between 2007 and 2017, HMRC paid £2.3bn in Film Tax Relief, representing almost £9bn spent on making films in the UK.
- 19.7 Document 06: The Case for Space suggests that the expansion and improvement of Shepperton Studios will be instrumental in helping to meet the Government’s ambition to accelerate sustainable growth in inward investment to the UK in film and HETV.
- 19.8 The Government’s Industrial Strategy – Creative Industries Sector Deal supports an expansion of facilities:
- ‘Film inward investment in the UK has grown by 92 per cent over the past five years and high-end TV by 162 per cent. 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.’*
- 19.9 This document also indicates that without the significant contributions of the studios within the West London cluster, it is unlikely that the policies of Government will be met and all of the associated benefits will be lost.
- 19.10 Government policy for major growth in UK film and HETV is clear, precise and urgent and this raises the weight to be given this proposal to that of national significance.

Review

- 19.11 In the Planning Statement submitted in connection with the expansion of Pinewood Studios, Buckinghamshire in 2013 states at para 8.58:

‘The vital role played by Pinewood Studios and its contribution to the UK film industry is such that the UK objective for growth will not be achieved unless Pinewood expands.’

The expansion at Pinewood Studios was allowed on appeal and yet the UK objective for growth was not achieved and according to the document 06: The Case for Space still relies on additional growth.

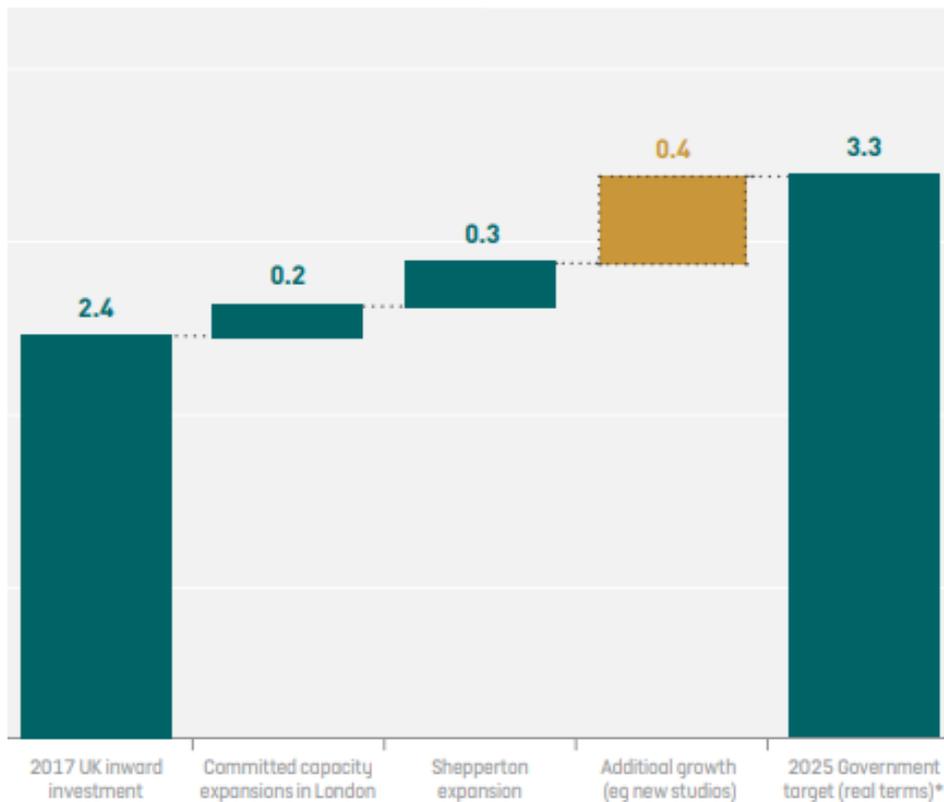


Figure 5: Objective for growth, Table 4.3 in Document 6: The Case for Space

- 19.12 In the appeal at Pinewood Studios, Buckinghamshire in 2014, the Secretary of State accepted that Government policy seeks sustainable economic growth and as part of this, attached high importance to the creative industries. Key statements of Government policy prior to and since this decision, both written and spoken, have attached great significance to the delivery of sustainable economic growth and this has been translated into planning policy through both the 2012 and 2018 NPPF documents.
- 19.13 However, the Government has not indicated, nor promoted, any form of special dispensation for film and HETV development that would override the Government's firm commitment to the protection of the Green Belt.
- 19.14 Although significant weight is accorded by the applicant to the Government's Industrial Strategy: Creative Industries Sector Deal, the documents states its intention to build on the recommendations of Sir Peter Bazalgette's independent review, which includes narrowing the gap in creative business activity between the South East of England and the rest of the UK.
- 19.15 Sir Peter Bazalgette is a leading figure in the creative industries and undertook an independent review of the creative industries for the Business and Culture Secretaries.
- 19.16 Focusing additional significant growth in film and HETV capacity in the West London Cluster would run contrary to this Government objective.
- 19.17 The applicant's primary use of information from the Creative Industries Sector Deal to support the proposal references a case study from the document, which although clearly used to illustrate the principles sought by the Government, does not show specific Government support for this particular development.

- 19.18 Both Pinewood and Leavesden have planning permissions which are yet to be completed and therefore there is already an ability to address Government policies and secure the associated benefits referred to, albeit that the level of associated benefits must necessarily be reduced. The Shepperton Studios Expansion would only be an element in the process, and it is both unreasonable and unrealistic of the applicant to suggest that all benefits would be lost without Shepperton.
- 19.19 The letters of support from film and television companies, directors and producers appears to provide evidence of a quantitative requirement for additional studio space, and evidence that such space would have the potential to attract major inward investment, which is an objective of Government policy.
- 19.20 A press release by the Government in December 2018 stated that in 2017 the creative industries made a record contribution to the UK economy, exceeding £100bn. This increase derives in part from a boom in the computer services sub-sector, which includes video games. The Secretary of State for Digital, Culture, Media and Sport has said:
- ‘Our creative industries not only fly the flag for the best of British creativity at home and abroad, but they are also the heart of our economy.*
- We’re doing all we can to support the sector’s talent and entrepreneurship as we build a Britain that I fit for future.’*
- It also highlighted that the Government is continuing to back the creative industries, including dedicated tax reliefs supporting HETV and film productions such as Peaky Blinders and Darkest Hour have seen a boom worth £12.6bn since the scheme was introduced. There was also £1.38bn of inward investment in the film industry last year as a result of tax relief.
- 19.21 The creative industries was named as a priority sector in the 2017 industry strategy which led to the 2018 £150m Sector Deal which provides a framework for targeted investment. Within the Sector Deal is up to £2m to be made available to kick-start an industry led skills package, including a creative careers programme which will reach at least 2,000 schools and 600,000 pupils in 2 years. A new London Screen Academy with places for up to 1000 students will also be open in 2019.
- 19.22 The Industry Strategy references, in a case study, the need for substantial increases in production capacity for the creative industries to grow to its potential. This case study also references improved capacity for film and TV studios with expansion at Pinewood, Shepperton and Leavesden all cited as important for sector health and dynamism. However the Strategy does not acknowledge the Green Belt or reference the proposed developments to the east of London, neither of which are constrained by the Green Belt.
- 19.23 The Greater London Authority prioritises the creative industries as a major part of the London economy and key initiatives include Creative Enterprise Zones which comprise 3 districts that will benefit from new capital and revenue investment to build high growth, resilient and sustainable creative clusters.
- 19.24 There is industry consensus that a lack of capacity is a barrier to growth for the UK screen industry, but less consensus regarding where this capacity can most effectively be delivered.

- 19.25 The West London Arc is the most significant cluster and the studios have the international brand value to attract investment which newer development cannot guarantee.
- 19.26 Based on the PwC research referred to in the applicant's submission (document 9: The Economic Impact) that indicates that Shepperton Studios, together with Pinewood Studios and Warner Brothers Leavesden is one of the only three that is large enough to accommodate major inward investment, it could reasonably be concluded that there is little realistic prospect of the Government policy ambition being achieved given the sectors current characteristics.
- 19.27 Assuming that this is the case, these three studios are essentially the West London Cluster and this creates the driver for the locational requirement.
- 19.28 The applicant's submission document 05: Planning Statement states that to develop a new studio of sufficient scale to contribute materially to the need identified by Government policy is neither a feasible or viable proposition.
- 19.29 Therefore given that PwC research and the Pinewood group have indicated that only two industry groups can secure inward investment at levels approaching those necessary to achieve Government policy, it can be reasonably assumed that the policy is unrealistic at this point in time, given the relevant factors.
- 19.30 It is concluded that whilst the proposal would contribute to the Government's policy ambitions, it would not result in them being met and what it does contribute is unlikely to be within the Government's stated timeframe of 2025. As a result, limited weight should be afforded to this consideration and on its own it would not clearly outweigh the harm to the Green Belt.

Shepperton is a key strategic site and its expansion is essential if the ambition of Government is to be met: there is no alternative.

- 19.31 Submitted document 05: Planning Statement explains that there is growth in demand by the film sector driving a requirement for additional studio space in the UK – London. This is further supported by document 07 Review of UK Film and High-End TV production facility market in which PwC identify UK-London as a leading and preferred destination.
- 19.32 The applicant argues that it is critical to take into account the market in which major film operates and in particular its choice of film locations. In the UK, this means the West London Cluster, of which Pinewood, Shepperton and Leavesden are the foundation.
- 19.33 The PwC review estimates that the scale of films lost to the UK-London market as a result of the lack of studio space is £2.8bn (based on 2015-2017 figures) or approximately £950mn per year.
- 19.34 The West London Cluster and its three world class studios all have a long heritage and have built up a substantial technical infrastructure of facilities and technologies together with a highly skilled crew and talent base. It is for this reason that the west London Cluster has its world-leading status.
- 19.35 These factors make film production at Shepperton efficient and cost effective, which is not necessarily the case at other global studios and feedback from producers' supports this view, as evidenced from the letters of support from

producers such as Simon Emanuel (Rogue One) Paul Greengrass (The Bourne Ultimatum) and Iain Smith (Mad Max: Fury Road)

- 19.36 London is a world class city which is highly accessible by air from global locations. The West London Cluster is particularly close to Heathrow which is the largest airport hub in UK, with the most passenger services from the US. In addition it is close to a variety of 'location' filming landscapes with 11 recent Shepperton productions using locations in the South East for external location filming.
- 19.37 The applicant argues that expanding the West London Cluster would represent an 'early win' and since it relates to the only a set of specific studios that have the potential to attract international film, this would justify a Green Belt exception as occurred at both Pinewood and Leavesden.
- 19.38 This is further supported by the practical consideration that there are no realistic alternatives, if Government policy on scale and urgency is taken into account, since a new studio is neither feasible nor viable in the short to medium term.
- 19.39 The applicant acknowledges in their submitted document 05: Planning Statement, that to develop within the West London Cluster would require land which is a scarce resource and that securing this land would be neither feasible nor viable under normal market conditions. In their view there is no 'reasonable or practical alternative'

Review

- 19.40 At a national level the applicant makes a compelling case for investing in additional sound stage capacity within the UK.
- 19.41 There is evidence suggesting capacity is constrained in the UK, including the anecdotal and survey evidence, the applicant's supporting documentation and testimonial evidence indicating that projects would have preferred to locate in the UK had stage space been available.
- 19.42 However, the estimated demand shortfall put forward appears to be overstated because it assumes that all 8 of the footloose blockbuster films would be captured not just by the UK, but specifically by the West London Cluster.
- 19.43 The applicant puts significant weight on the expansion of Shepperton, given its position within the West London Cluster, however little specific evidence is provided to underpin the claimed benefits over and above other locations in the UK. Even the applicant's illustration of suppliers near Shepperton shows a wider spread.

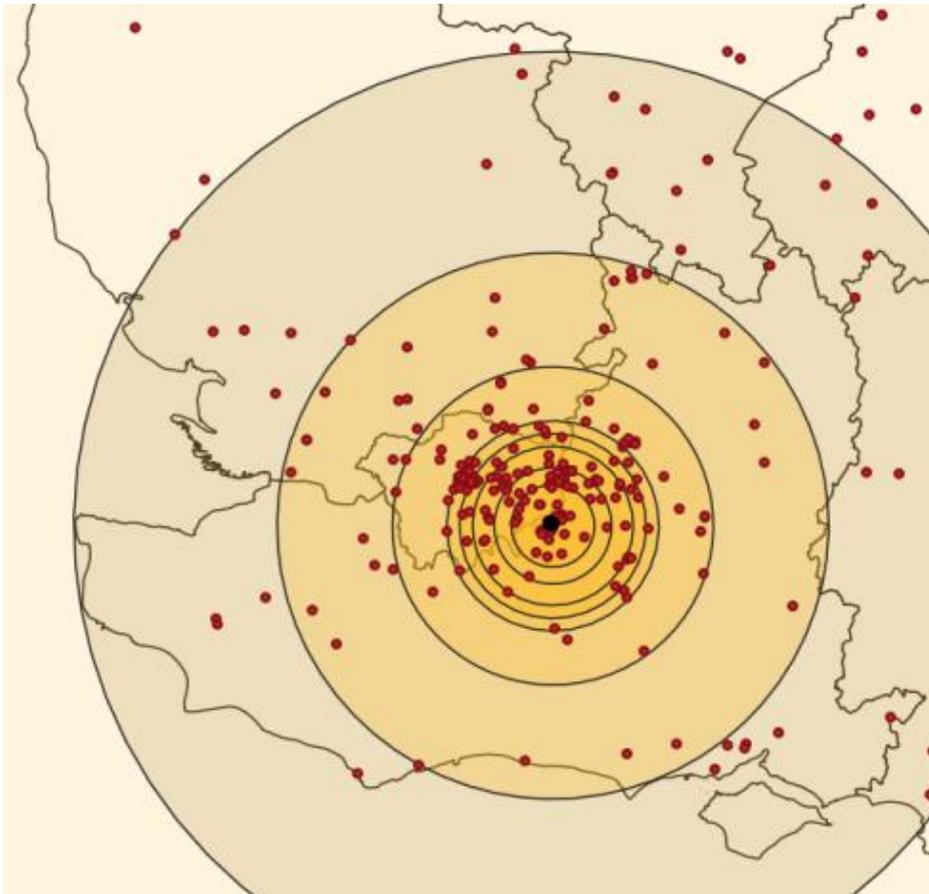


Figure 6: Shepperton supplier locations vs Shepperton, Document 7: Review of UK Film and HETV production facility market

19.44 In terms of the Government's Industry Strategy: Creative Industry Sector Deal, this states:

'The independent Bazalgette review found that while creative businesses were already thriving, joint action by industry and government could unlock further growth, particularly outside their biggest existing concentration of strength in London and the South East.'

19.45 In the Planning Statement submitted in connection with the expansion of Pinewood Studios, Buckinghamshire in 2013 states at para 8.83:

'As an unmatched production hub, it is a fundamental part of the very special circumstances case that the investment needed to grow the UK market share is not footloose and must therefore take place at Pinewood Studios. On the basis that Pinewood Studios can only be expanded where it exists, the proposed development is therefore geographically fixed at Iver Heath and cannot be replicated elsewhere.'

19.46 In the Warner Brothers Planning, Design and Access statement submitted in support of their expansion at the Leavesden studio it states:

'There are no viable alternative sites that could be developed that would meet the additional requirements of the Studios. Key to success of the Studios is the comprehensive range of film making activities that can be undertaken on a single suite.'

- 19.47 Whilst the LPA acknowledges that efficiencies during production are likely to be a key factor in reducing the risk profile of film production, as set out in the submission document 05: Planning Statement, and that this would include adequate space being available in a single studio location, this would justify the scale of a studio, but not the necessity for this particular location given other planning factors.
- 19.48 It is concluded that Shepperton is not a key strategic site that is essential if Government ambition is to be met. Big budget films and HETV exist at a number of locations across the UK and therefore alternatives are possible.
- 19.49 As a result no significant weight should be afforded to this consideration either on its own or in combination in the determination as to whether the harm to the Green Belt is clearly outweighed.

The economic benefits to the national regional and local economy

- 19.50 Submitted document 05: Planning Statement indicates that the proposal represents an investment of approximately £500m, which together with the economic benefits should be accorded significant weight since this would be directly supported by Government Policy.
- 19.51 The applicant states that Shepperton Studios is a major employer providing 1507 full time equivalent (FTE) direct jobs and approximately 3,000 (FTE) indirect jobs.
- 19.52 Once completed the expanded studios would deliver a significant range of economic benefit including:
- 2,796 (FTE) direct jobs;
 - 2,516 (FTE) indirect jobs across the UK economy;
 - £322.7m GVA per annum to the UK economy of which £193.6m would be within Spelthorne Borough;
 - £61.1m to the Exchequer; and
 - £75.5m to UK exports.
- 19.53 The proposal would enable to UK to capture a greater share of the global film market and would make a pivotal contribution to the Government target of increasing inward investment to £4bn per annum by 2025.
- 19.54 The net economic effects of the proposed expansion are estimated to be:
- 2,019 (FTE) direct jobs and 271 (FTE) indirect jobs;
 - £141m GVA per annum;
 - £40m to the Exchequer; and
 - £30m to UK exports.
- 19.55 Document 09: Expanding Shepperton Studios - The Economic Impact identifies that that the economic benefits of the expansion are not only of national importance, but regional and local as well.
- 19.56 The Enterprise M3 Local Enterprise Partnership (LEP) has expressed support for the sector, with the Strategic Economic Plan focusing on sectors that play to the area's strengths. The entertainment technologies that includes film is

identified as 'niche specialism' that can contribute to the areas economic potential.

- 19.57 At the local level the applicant believes that the proposal is supported by the Councils Corporate Plan which seeks to stimulate investment, jobs and visitors to the Borough. In addition the Borough Economic Study 2017-2022 identifies Shepperton Studios as a strategic employer within the Borough which is critical to the local economy. As such Shepperton Studios is considered to be a key economic asset to the Borough.
- 19.58 The expansion of the studios would create and sustain significant economic benefits during the 4 year construction period. Construction activity will generate 837 (FTE) temporary jobs ta a UK level, of which 498 will be contained in the West London Cluster, 440 in the Enterprise M3 LEP and 231 in Spelthorne Borough.
- 19.59 Once completed the expanded studios would deliver an enhanced range of beneficial economic impacts. The expanded studios will support 2,796 gross (FTE) jobs comprising the Studio's direct employees and other staff based in tenant companies and production companies. An additional 2,516 (FTE) indirect and induced jobs would be supported across the UK economy, of which 1558 would be contained in the West London area, 112 in the Enterprise M3 LEP and 28 in Spelthorne Borough.
- 19.60 The UK film and HETV sectors make an important contribution to the UK economy and the sectors' growth over the past 5 years exceeds the growth of the UK economy over the same period. There are wider supply chain links associated with the film sector which means that the economic effects of investment in the sector is amplified throughout the UK economy.

Review

- 19.61 The approach adopted to assessing the economic impact of the proposed expansion is reasonable and consistent with accepted practice, although it has omitted certain local costs associated with development.
- 19.62 There is a compelling case for investment on film and HETV in the UK given the Government's policy support, although the case for the expansion of Shepperton is less clear given the planning balance.
- 19.63 Although the applicant cites the benefits of job creation during the construction phase, Central Government Guidance suggests that such increases should be afforded less weight in decision making due to their temporary nature and the likely displacement from other construction projects.
- 19.64 Document 09: Expanding Shepperton Studios - The Economic Impact identifies that PSGL as whole employs approximately 280 people, of which 80 are based at Shepperton (equating to 27%, but that in practice many staff work between the two. Of the 80 Shepperton based staff 10% live within Spelthorne Borough.
- 19.65 Despite the applicant's claim that the proposal will generate significant employment at the local level and across the wider M3 LEP, they indicate that of the 2,796 direct jobs created by the proposal, only 141 would be within Spelthorne Borough and only 28 of the indirect jobs. In addition only 112 jobs would be created within the M3 LEP.

- 19.66 With respect to local job opportunities, there is little supporting evidence in respect of the type of employment that would be created as a result of the development, except that it would likely replicate the existing pattern at the studio. As a result of this and Spelthorne's existing economic situation the 141 net additional jobs within the Borough is likely to be overstated
- 19.67 There is compelling and robust evidence that the proposal, once complete, would generate national economic benefits and this supported by the Enterprise M3 Local Enterprise Partnership (LEP) confirming the applicant's estimates and stating that benefit the region in terms of innovation and support.
- 19.68 However, it should be noted that the estimated £40m GVA does not include the cost of the film tax credit therefore the net impact of the development is likely overstated.
- 19.69 Whilst the applicant has referred to Policy EM1 of the CS&P DPD which states that the Council will maintain employment development by retaining employment areas and supporting proposals for employment development, the expansion site is not a defined employment area.
- 19.70 It is concluded that the economic benefits at a local and regional level, although beneficial, are limited and as a result should be afforded limited weight in considering whether the harm to the Green Belt is clearly outweighed. However, at a national level the economic benefits are potentially significant and would contribute to national objectives. Whilst it is recognised that there is a risk derived from a level of uncertainty of the economics and this must reduce the weight that can be attached, it is considered that significant weight should be attributed to this consideration, both individually and in combination, in determining whether the harm to the Green Belt is clearly outweighed.

Community benefits.

- 19.71 The applicant indicates that they strive to build and maintain relationships with the local community sharing studio information, supporting and hosting community events and screenings, and providing a liaison officer.
- 19.72 Current operations at Shepperton provide a number of community benefits within the immediate local area and the wider Borough, including attending and hosting career fairs and events, donations, support and sponsorship for local charities and events and educational support for film studies on a national level.
- 19.73 One of the most significant benefits would be the enhancement of the River Ash corridor, which would include ongoing maintenance and management for the benefit of the public and the biodiversity of the area.
- 19.74 As part of the expansion proposal, the applicant states that they would retain the existing benefits, expand the range offered and create new opportunities. These benefits have local importance and should be afforded weight in the overall balance

Review

- 19.75 Document 09: Expanding Shepperton Studios - The Economic Impact states that Shepperton Studios has run a successful Corporate Responsibilities (CSR) Programme for many years comprising four themes

- Training Skills and Apprenticeships;
 - Community Outreach;
 - Supporting Charity; and
 - Promoting Diversity
- 19.76 The document states that PSGL is a socially responsible organisation that places particular emphasis on ensuring that it creates and sustains social value through its activities, with Shepperton Studios currently making a *‘very positive contribution to the life of local communities.’*
- 19.77 The Warner Brothers application for the expansion of its studios at Leavesden was clear in its supporting information that they were conscious of the importance of being a good corporate citizen, working to improve life Hertfordshire through education, training, community and charity.
- 19.78 Many of the businesses in Spelthorne Borough run similar programmes to support the communities in which are they located and on which they have an impact. This is not considered to be unique to Shepperton Studios, locally, regionally or nationally.
- 19.79 Notwithstanding that the specific section of the River Ash Corridor referred to is within the Council’s ownership and is already publicly accessible, or that its location and scale limits its benefit to a very restricted area, Document 14: Ecological Appraisal refers to the enhancement of the River Ash Corridor as providing the mitigation for the development sufficient to provide a net gain in biodiversity. Whilst the proposed enhancements include a circular walk, as opposed to a linear one, this is being double counted by the applicant as both mitigation and a community benefit.
- 19.80 As a result, limited weight should be afforded to this consideration and on its own it would not clearly outweigh the harm to the Green Belt.

Other matters: The Role of the West London Cluster

- 19.81 The applicant indicates that there is a range of other matters which weigh in support of the very special circumstances:
- 19.82 The role of the West London Cluster in supporting the performance of other UK studios. Producers have a wide range of global clusters across the world to choose from. In the UK, the only international film destination that is competitive in a global context is the West London Cluster. High-end TV has similar production standards and production standards to that of a major film, but is distinguished by longer periods of production and a greater level of geographical flexibility – both globally and at a UK level.
- 19.83 There is a clear ranking and preference with by far the most desired being the West London Cluster, with London currently having sound stage capacity broadly similar to its peer group, with the exception of LA.
- 19.84 The popularity of the West London Cluster is driven by the attributes of an economic cluster. There is a technical infrastructure of facilities and technologies with a highly skilled crew and talent base. Such a complete resource is not available to the same degree at other global clusters. The locational advantage is driven by London as a leading world city and the accessibility of Central London to the site is critical. The financial benefits of tax relief and Government support. The Pinewood Group brand has a distinct

advantage with an established and respected track record minimises uncertainty and lowers risk. Choice in terms of the scale and quality of facilities that the market understands will be available.

- 19.85 In this highly competitive environment for footloose investment, failing to supply what the market demands is a risk to the UK's inward investment performance in film.
- 19.86 The regional studio facilities that either do exist or are proposed serve a different segment of the film and TV market. The High-End TV market has an international dimension and also attracts Government tax relief and Shepperton is one of several studios supporting this sector, albeit that the other studios are typically smaller scale.

Review

- 19.87 London is a global creative city, with the creative economy estimated to provide one in six jobs in London and is one of London's fastest growing sectors.
- 19.88 To date London has been very successful in attracting mobile global capital and talent to produce large-scale films. The attractive tax credit system, available expertise and skills quality of facilities are all attributed as factors which have shaped success.
- 19.89 However, London does not contain the full value-chain of the film industry, finance and talent are footloose, which means that much of the profit generated is off-shore and a proportion of the talent is based elsewhere. In many respects London has over performed in a fiercely competitive global market, so whilst there is a good platform to build from, there is an ongoing risk that global capital could move elsewhere.
- 19.90 Although London high-end TV has grown 162% in 5 years, the market share is comparatively small and London has yet to become a genuinely major global cluster. However, it is recognised that the sector is likely to continue for at least the next 5 years, placing additional demand on capacity currently used for large-scale film production.
- 19.91 Assuming favourable conditions for growth the studio expansion can play a strategic role as part of a wider expansion and upgrade of capacity and quality in the London and UK film industry.
- 19.92 However, one of the stated aims of the Government's Industrial Strategy: Creative Industries Sector Deal is to narrow the gap in creative business activity between the South East of England and the rest of the UK.
- 19.93 Notwithstanding that the West London Cluster essentially represents Pinewood Studios, Warner Brothers and Shepperton, which are the prominent global studio operators in the UK, little specific evidence is provided to underpin the claimed role, over and above other locations in the UK.
- 19.94 It is concluded that the role of the West London Cluster relates primarily to the studio operators, that it is not the only location where big-budget films are made and that one of Government's key aims is to distribute clusters more equitably.
- 19.95 As a result, whilst the potential of the West London Cluster should be recognised, limited weight should be afforded to this consideration and on its own it would not clearly outweigh the harm to the Green Belt.

Other matters: Spin-off benefits

- 19.96 The UK studio spin off benefits. The applicant states that the British Film Commission (BFC) and the British Film Institute (BFI) support the expansion as being good for the UK-wide industry.
- 19.97 The spin-off benefits to the rest of the UK are stated as being by way of 'on-location' or special shooting using regional facilities and places.
- 19.98 Creative England has advised that in the last 6 years they have supported over 5,000 productions to film on location in England including 450 feature films and over 500 TV dramas leading to an estimated economic impact of early £500m to the English Regions.

Review

- 19.99 The economic evidence provided as part of the application indicates that there are spin-off benefits to the wider UK economy that would occur from increased investment in the sector. However, these benefits are not specific to the expansion of Shepperton and neither SSL, nor PSG equate to the UK film industry as whole.
- 19.100As a result no significant weight should be afforded to this consideration either on its own or in combination in the determination as to whether the harm to the Green Belt is clearly outweighed.

Other matters: Sustainability

- 19.101The applicant states that the proposed development is in a highly sustainable location and will provide a range of social, economic and environmental benefits.
- 19.102The expansion proposal are underpinned by Pinewood Studios Group corporate approach to sustainability and the developments design will deliver benefits that mitigate and adapting to the impacts of climate change.
- 19.103Pinewood Studios Group has a proactive approach to sustainability and has set a number of targets regarding emissions.
- 19.104There is an existing travel plan to facilitate sustainable travel which includes a shuttle bus service between the Studios to local rail stations, use of hybrid pool cars, provision of EV charging points and secure cycle storage.
- 19.105The Studios site has sustainable connections and with the expansion site is considered to be well suited with walking and cycling links to local settlements and communities in terms of
- 19.106Part of PSG's environmental management includes the ongoing monitoring of ecological habitats and ensuring potential for pollution and damage is minimised. At Shepperton Studios the applicant indicates that this includes the River Ash.
- 19.107PSG's Corporate Social responsibilities programme includes initiatives include funding and sponsorship in three principle areas local community, charities and organisations which provide access, training and support for people who want to work in British screen based industries.

Review

19.108 The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development and this has three over-arching objectives:

- economic
- social
- environmental

19.109 However it also states

‘These are objectives that should be delivered through preparation and implementation of plans and the application of Framework policies; they are not criteria against which every decision can or should be judged.’

19.110 The applicant’s sustainability benefits are crystallised in the executive summary of their Sustainability Appraisal. However, these aspects have been considered elsewhere in this report and attributed appropriate weight in the planning balance.

19.111 Although the applicant states that the Local Development Plan supports the continued growth of Shepperton Studios and is therefore sustainable in planning policy terms, Policy EM1 seeks to maintain employment development by encouraging proposals that make the most effective use of available employment land. The redevelopment of the existing Studios site meets the requirements of this policy, however the expansion into the Green Belt does not.

Other matters: Arts and Culture

19.112 Arts and culture of the film industry was highlighted in the Prime Minister’s 2018 speech.

“But of course, the value of culture and creativity lies not only in its economic strength. Just as important is the less tangible contribution that it makes to our national life.”

19.113 The contribution of Shepperton and the Pinewood Group makes is substantial in retaining, supporting and expanding all elements that go into film production and which supports the ‘less tangible’ referenced by the Prime Minister.

19.114 The applicant therefore considers that the support of culture and the arts is therefore a material consideration and part of the very special circumstances.

19.115 The applicant’s Sustainability Appraisal states that the Pinewood Studios Group is the leading independent provider of real estate that is required for the production of film and television content.

19.116 Shepperton Studios is part of the Pinewood Studios Group global real estate holdings which supports the Creative Industries and allows them to express the value of culture and creativity.

19.117 Whilst the importance of the less tangible value of culture and creativity in a wider sense is recognised, it is considered that Shepperton Studios role is primarily that of a vehicle to achieve those values and as a result no significant weight should be afforded to this consideration either on its own or in combination in the determination as to whether the harm to the Green Belt is clearly outweighed.

20. Conclusion

- 20.1 It has been acknowledged that the proposal would, by definition, represent harm to the Green Belt as a result of being inappropriate development and would therefore give rise to Green Belt harm by reason of loss of openness, clear conflict with three of the five Green Belt purposes and a moderate adverse effect on landscape and visual amenity. However, it is also noted that some Green Belt benefit would be derived from gains to biodiversity.
- 20.2 The protection of the Green Belt is a national policy objective and the Government attaches substantial weight to it, with permanence as a key element.
- 20.3 The cumulative impact of the film studio industry's encroachment into the Green Belt is recognised, however each case must be considered on its individual merits and the weight afforded to policy considerations for development in the Green Belt are not considered to be adversely affected.
- 20.4 It is considered that in addition to the harm to the Green Belt, the proposal would also represent harm in terms of the visual impact on the landscape. Whilst it was recognised that the proposal would result in harm to the local road network, ecology, the historic environment, flood protection and air quality, these could be mitigated through appropriate conditions and planning obligations and therefore the weight attached to them in planning balance must be limited.
- 20.5 In support of the proposal, there is Government policy with the objective of attracting film and HETV into the UK. The creative industries was named as a priority sector in the 2017 Industrial Strategy, which led to the 2018 Sector Deal that provides a framework for targeted investment.
- 20.6 Shepperton Studios has a global status within the film industry and is important to the UK's film industry and the industry's contribution to the UK economy. There is also an acknowledged shortage in UK studio capacity and the case presented in this regard is compelling.
- 20.7 Overall there is an economic case for the proposal, albeit that there is a degree of risk associated with the level of investment and timescales involved. However, the proposal would deliver substantial national economic benefits assuming it is implemented and occupied in full and significant weight should be accorded to this.
- 20.8 Careful consideration has been given to the Government's conflicting aims of protecting the Green Belt and promoting sustainable economic growth and it is concluded that the harm to the Green Belt and other identified harm is clearly outweighed by the national economic argument and the support for Government policy aims.
- 20.9 In addition, the individual circumstances of the film industry and the ability of Shepperton Studios to secure this significant level of investment, taken together provide a particular combination of circumstances individual to this particular case.
- 20.10 It is therefore concluded that very special circumstances exist to warrant allowing inappropriate development that causes harm to the Green Belt.

21. Local Finance Considerations

- 21.1 Under S155 of the Housing and Planning Act 2016, Local Planning Authorities are required to ensure that financial benefit information is publicly reported through the Committee process. A financial benefit must be recorded regardless of whether it is material to the Local Planning Authority's decision on a planning application, but planning officers are required to indicate their opinion as to whether the benefit is material to the application or not.
- 21.2 In consideration of S155 of the Housing and Planning Act 2016, the proposal would result in the following financial contributions:
- £6,150 to be used to review the Travel Plan submitted as part of the justification for reducing the parking provision on the site and promoting alternative modes of transport.
 - £10,000 to be used as a contribution towards the review of parking restrictions in the area.
 - £20,000 to be used to implement a signage strategy dependant on the results of the traffic monitoring surveys.
- 21.3 These are considered to be a material considerations in the determination of this planning application. The proposal will also generate Business Rates payments which are not material considerations in the determination of this proposal.

S106 Planning Obligation

- 21.4 Planning obligations assist in mitigating the impact of unacceptable development to make it acceptable in planning terms. Planning obligations may only constitute a reason for granting planning permission if they meet the tests that they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind.
- 21.5 Planning obligations should not be sought where they are clearly not necessary to make the development acceptable in planning terms.
- 21.6 Regulation 122 of the Community Infrastructure Levy 2010 provides the test, it states:
- (1) This regulation applies where a relevant determination is made which results in planning permission being granted for development.
- (2) A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is—
- (a) necessary to make the development acceptable in planning terms;
 - (b) directly related to the development; and
 - (c) fairly and reasonably related in scale and kind to the development.
- 21.7 The obligations listed in section 22.3 of this report are considered to meet the Regulation 122 test and are justified in policy terms.
- 21.8 There are highway, ecological and social matters which need to be secured by way of a legal agreement pursuant to Section 106 which are to be delivered as part of the development. It is important that any legal agreement runs with the land and therefore ensuring that the obligations are enforceable under the terms of Section 106 of the Town and Country Planning Act. In the

event that the S106 agreement is not completed to the satisfaction of the Local Planning Authority, and in the event that the applicant does not agree a further extension of time for determination, the recommendation is to refuse planning permission.

22. Recommendation

22.1 The proposed expansion of Shepperton Studios into 39ha of Green Belt is inappropriate development and by definition is harmful and should not be approved unless the potential harm and any other harm resulting from the proposal is clearly outweighed by other considerations.

22.2 Under the Town and Country Planning (Consultation) (England) Direction 2009, where a Local Planning Authority proposes to approve inappropriate development within the Green Belt of 1000m² or more, the application must be referred to the Secretary of State before any permission can be issued. The Secretary of State has the power to call-in the application for his own determination.

22.3 Since the proposed development falls within this criteria, the application will be required to be referred to the Secretary of State under this Direction.

(A) To GRANT outline planning permission subject to the applicant first entering into an appropriate legal agreement in respect of the following:

- Provision of a Highway Works Phasing Plan
- To enter into a s278 and/or s38 agreement with the County Council in respect of highway works to 7 junctions and provision of crossing points in Laleham and Charlton.
- To undertake regular traffic monitoring surveys until full occupation, covering the key routes through Laleham, Littleton and Charlton Village and submit a traffic mitigation plan where necessary.
- To provide a Travel Plan.
- To provide a financial contribution of £6,150 Travel Plan monitoring fee.
- To provide financial contribution of £20,000 towards a signage strategy.
- To provide a financial contribution of £10,000 towards the review of parking restrictions in the area.
- To provide detailed proposal for an improved shuttle bus scheme to/from the site.
- To provide a detailed proposal for the creation of a virtual media academy, including but not limited to five sponsorships to the National Film and Television School, an apprenticeship programme and a programme of film and media support in local education.
- To provide a detailed proposal for a River Ash community park scheme and a maintenance programme for a minimum of fifteen years.
- To provide a detailed proposal for the creation of a Good Neighbour Scheme to run until five years after full occupation of the development.

(B) In the event that the Section 106 Agreement is not completed In the event that the Section 106 agreement is not completed to the satisfaction of the Local Planning Authority and/or the applicant does not agree an extension of time for the determination of the planning application, delegate to the

Planning Development Manager in consultation with the Chairman of the Planning Committee the following: REFUSE the planning application for the following reasons:

1. The development represents inappropriate development in the Green Belt for which very special circumstances do not exist because the potential harm to the Green Belt by reason of inappropriateness, and other harm resulting from the proposal, has not been clearly outweighed by other considerations. The proposal would result in the site having an urban character, would diminish the openness of the Green Belt and conflict with the purposes of including land within it. In particular, it would not comply with the Green Belt purposes: to check the unrestricted sprawl of large built-up areas, to prevent neighbouring towns merging together; and to assist in safeguarding the countryside from encroachment. It is therefore contrary to Saved Policy GB1 of the Spelthorne Borough Local Plan 2001 and Section 13 (Protecting Green Belt Land) of the Government's National Planning Policy Framework 2018.

Conditions

1. RESERVED MATTERS

No part of the development hereby permitted shall be begun until details of the layout, scale, appearance, landscaping and means of access defined in the Town and Country Planning (General Development Procedure) Order, 1995, or any subsequent enactment) of that part (hereinafter called “the reserved matters”) has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved details.

Reason: This is an outline application permitted in accordance with the provisions of Article 5 of the Town and Country Planning (Development Management Procedure) Order 2015.

2. TIME FOR SUBMISSION of 1st RESERVED MATTER

The first application for approval of reserved matters shall be made to the Local Planning Authority no later than 2 years from the date of this permission and shall include a programme which sets out the proposed implementation of the part of the development (including demolition of buildings, provision of car parking and servicing arrangements) to which the application relates. The development shall be begun before the expiration of 2 year from the date of approval of the last of the details to be approved pursuant to this condition, and shall be carried out in accordance with the approved details.

Reason: This condition is required by Section 92 of the Town and Country Planning Act, 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

3. MASTERPLAN (illustrative)

Each reserved matters application shall be accompanied by a high-level illustrative masterplan which provides an up to date context for the development as a whole and for the determination of the reserved matters submissions.

Reason: For the avoidance of doubt and in the interests of proper planning.

4. LIFE OF THE PERMISSION

Application for approval of the last reserved matters shall be made to the Local Planning Authority before the expiration of 10 years from the date of this permission.

Reason: This condition is required by Section 92 of the Town and Country Planning Act, 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

5. IN ACCORDANCE WITH APPROVED PLANS AND DETAILS

The development on this site shall be carried out in substantial accordance with the design principles and development objectives set out within:

- Design and Access Statement date stamped November 2018
- PP.3 Movement Drawing No. 3542-FBA-00-XX-DR PP.3 Rev 1 Rcvd 14 Jan 2019,
- PP.4 Development Zones Drawing No. 3542-FBA-00-XX-DR PP.4 Rev 1 Rcvd 14 Jan 2019,
- PP.5 Heights Drawing No. 3542-FBA-00-XX-DR PP.5 Rev 1 Rcvd 14 Jan 2019,
- PP.6 Green Infrastructure Drawing No. 3542-FBA-00-XX-DR PP.6 Rev 2 Rcvd 14 Jan 2019,
- PP.7 Flood Protection Drawing No. 3542-FBA-00-XX-DR PP.7 Rev 1 Rcvd 14 Jan 2019,
- PP.8 Movement Drawing No. 3542-FBA-00-XX-DR PP.8 Rev 1 Rcvd 14 Jan 2019 and
- PP.12 Composite Parameters Plan Drawing No. 3542-FBA-00-XX-DR PP.12 Rev 2 Rcvd 14 Jan 2019.

Reason: The proposed development is the subject of an Environmental Impact Assessment and any material alteration to the design principles and development objectives may have an impact which has not been assessed by that process, having regard to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

NOTE: The Environmental Statement has been prepared in accordance with the requirements of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and the application has been assessed in relation to the Environmental Statement, which forms the basis of this decision.

6. MATERIALS

Prior to commencement of above ground works of each part of development details of the materials to be used for the external surfaces of the building(s) and surface material for parking areas within that part shall be submitted to and approved by the Local Planning Authority. The development shall be constructed in accordance with the approved materials and detailing.

Reason: To ensure that the proposed development does not adversely impact the appearance of the development and the visual amenities and character of the locality, in accordance with policies SP6 and EN1 of the Spelthorne Borough Core Strategy and Policies Development Plan Document 2009.

7. RENEWABLES

Details shall be provided in conjunction with each reserved matters application to demonstrate how 10% of the energy requirements generated by the development as a whole will be achieved utilising renewable energy sources. The details shall identify how renewable energy, passive energy and efficiency measures will be generated and utilised for each of the proposed buildings to meet collectively the requirement for the development. The agreed details shall be implemented with the construction of each building and thereafter retained and maintained.

Reason: To ensure that the development is sustainable and complies with Policies SP7 and CC1 of the Spelthorne Borough Core Strategy and Policies Development Plan Document 2009.

8. TRAVEL PLAN

No part of the development shall commence until a Travel Plan has been submitted to, and approved in writing by, the Local Planning Authority. The Travel Plan shall be in general accordance with the "Framework Travel Plan" document prepared by i-Transport and dated August 2018.

The applicant shall then implement the approved travel plan (in accordance with the agreed trigger points contained within the approved document) and for each subsequent occupation of the development, thereafter maintain and operate the travel plan.

Reason: In order that the development should not prejudice highway safety, nor cause inconvenience to other highway users, and to accord with the National Planning Policy Framework 2018 and policy CC2 of Spelthorne Borough Council's Core Strategy and Policies Development Plan Document February 2009.

9. CONSTRUCTION OF ACCESSES

Before preparation of any groundworks or foundations for buildings within each and any phase of the development, the relevant new access shall be completed to base course level, together with the surface water and foul sewers to the approval of the Local Planning Authority in consultation with the Highway Authority, unless otherwise agreed in writing with the Local Planning Authority.

Reason: In the interests of and for the safety of persons and vehicles using the premises and/or the adjoining road, coupled with the requirements of paragraph 108 of the National Planning Policy Framework 2018.

10. BACKLOT (Structures height)

No sets, structures or associated rigging on the backlot area as identified as A4 on Composite Parameters Plan 3542-FBA-00-XX-DR-PP.12 Rev 2 shall exceed 3m in height when measured from ground level.

Reason: In the interest of the visual amenity of the neighbouring residential properties.

11. BACKLOT (A4 Times)

The backlot site identified as A4 on Composite Parameters Plan 3542-FBA-00-XX-DR-PP.12 Rev 2 shall only be used for filming between the hours of 7.00am and 11.00pm Monday to Saturday and may not be used on Sundays or Bank Holidays.

Filming should cease at 10.00pm during the months October-March each year. There should be no night shooting outside these hours unless agreed by the Local Planning Authority.

Reason: To protect the amenities of the surrounding residential properties.

12. BACKLOT (A4 working times)

The construction and dismantling of sets and the associated vehicular activity the backlot site identified as A4 on Composite Parameters Plan 3542-FBA-00-XX-DR-PP.12 Rev 2 shall only take place between the hours of 7.30am and 7.00pm Monday to Friday and 8.00am and 1.00pm Saturday and not at all on Sundays or Bank Holidays.

Reason: To protect the amenities of the surrounding residential properties.

13. PARKING

The completed development shall provide a minimum of 2,595 permanent car parking spaces within clearly and specifically designed parking areas. The first reserved matters application for each part of the development shall include details of the quantum and location of car parking to serve that part. No part of the development shall be occupied until the approved car parking spaces to serve that part have been laid out and are available for use. Thereafter, all approved car parking spaces shall be maintained and not used for any other purpose.

Reason: To ensure that the proposed development does not prejudice the free flow of traffic or the conditions of general safety along the neighbouring highway(s) and to ensure that the facilities provided are reserved for the benefit of the development for which they are specifically required, in accordance with policy CC3 of the Spelthorne Borough Core Strategy and Policies Development Plan Document 2009.

14 CYCLE PARKING

Details shall be provided in conjunction with each reserved matters application to demonstrate that appropriate cycle facilities are provided. Those facilities shall include:

- (a) The secure parking of bicycles within the development site,
- (b) Facilities within the development site for cyclist to change into and out of cyclist equipment and shower,
- (c) Providing safe routes for pedestrians and cyclists to travel within the development site
- (d) Information to be provided to staff and visitors regarding the availability and whereabouts of local public transport, walking and cycling facilities.

Thereafter the said approved facilities shall be provided, retained and maintained to the satisfaction of the Local Planning Authority.

Reason: To ensure that the development makes suitable provision for sustainable travel, in accordance with the sustainable objectives of Chapter 9 "Promoting sustainable transport" of the National Planning Policy Framework (2018), and policies CC2 and CC3 of Spelthorne Borough Council's Core Strategy and Policies Development Plan Document February 2009.

15. ELECTRIC CAR CHARGING

No part of the development shall be occupied until details of charging facilities for electric cars in respect of that part have been submitted to and approved in writing by the Local Planning Authority. The details shall include the provision of dual fast charge points and dual rapid charge points. No part of the development shall be occupied until the approved charging facilities in respect of that part have been provided and are available for use.

Reason: To ensure that the development encourages sustainable travel and complies with Policies SP7 and CC1 of the Spelthorne Borough Core Strategy and Policies Development Plan Document 2009 and sections 2 & 9 of the National Planning Policy Framework.

16. TREE PROTECTION DETAILS REQUIRED.

No demolition, site clearance or building operations shall commence on any part of the development until protective fencing consisting of weld mesh panels on a scaffold framework as shown in Figure 2 of BS5837 2012 has been erected around each tree or tree group to be retained within that part in accordance with details to be submitted to and approved by the Local Planning Authority. Such details shall include trenches, pipe runs for services and drains. Such fencing shall be maintained during the course of construction of that part and no storage of materials or erection of buildings shall take place within the fenced area.

Reason: To prevent damage to the trees in the interest of the visual amenities of the area, in accordance with policies SP6 and EN1 of the Spelthorne Borough Core Strategy and Policies Development Plan Document 2009.

17. BIODIVERSITY

No part of the development hereby approved shall be begun until, a scheme for the enhancement of the site for biodiversity purposes, has been submitted to, and approved in writing by, the local planning authority. The scheme shall be in accordance the submitted Ecological Assessment, dated August 2018 and include a programme for implementation and future management. The approved scheme of enhancements shall be implemented in accordance with the approved details and thereafter so retained.

Reason: To identify and ensure the survival and protection of important species and those protected by legislation that could be adversely affected by the development, having regard to policies EN8 and EN9 of the Spelthorne Borough Core Strategy and Policies Development Plan Document 2009 and paragraphs 170 and 175 of the National Planning Policy Framework 2018.

18. BUFFER ZONES 15 M (GROUND)

No part of the development including hardstanding and fences shall be carried out within a buffer zone of a width of 15 metres either side of that part of the River Ash watercourse which is located within the application site.

Reason: To maintain the character of the watercourse and provide undisturbed refuges for wildlife using the river corridor in accordance with policies SP1, SP7 and LO1 of the Spelthorne Borough Core Strategy and Policies Development Plan Document 2009

19. MEANS OF ENCLOSURE- DETAILS REQUIRED.

Prior to the occupation of any building within any part of the development, details of the means of enclosure within that part shall be submitted to and approved in writing by the Local Planning Authority. The details shall indicate the position, design, materials and type of boundary treatment to be erected. No building in any part of the development shall be occupied until the boundary treatment in respect of that part has been carried out in accordance with the approved details. Therefore, the boundary treatment shall be maintained as approved.

Reason: To ensure that the proposed development does not prejudice the enjoyment by neighbouring occupiers of their properties and the appearance of the locality, in accordance with policies SP6 and EN1 of the Spelthorne Borough Core Strategy and Policies Development Plan Document 2009.

20. NO EXTERNAL STORAGE.

No open storage of materials or waste and no placement of plant or machinery over the height of 3m (excluding vehicles) shall take place on any boundary directly adjoining residential curtilages except inside the approved building(s).

Reason: To ensure that the proposed development does not prejudice the enjoyment by neighbouring occupiers of their properties and the appearance of the locality, in accordance with policies SP6 and EN1 of the Spelthorne Borough Core Strategy and Policies Development Plan Document 2009

21. PLANT NOISE

The rated noise level from the plant hereby approved shall be at least 10 dB(A) below the background noise level at the nearest noise sensitive property as assessed using the guidance contained within BS 4142 (2014) (or any replacement publication or standard).

Reason: To safeguard the amenity of nearby residential properties.

22. DUST MITIGATION PLAN

No part of the development shall begin until a Dust Mitigation Plan providing a programme for the suppression of dust during the construction of that part (including demolition of existing buildings) and including a dust monitoring strategy, has been submitted to and approved in writing by the Local Planning Authority. The measures approved shall be employed throughout the period of demolition and construction unless any variation has been approved by the Local Planning Authority.

Reason: Details are required prior to commencement because insufficient information has been submitted with the application in this regard, in the interests of residential amenity and in accordance with policies SP6 and EN15 of the Spelthorne Borough Core Strategy and Policies Development Plan Document 2009.

23. METHOD OF CONSTRUCTION STATEMENT

No part of the development shall begin until a Method of Construction Statement for that part, to include, but not limited to, details of:

- (a) parking for vehicles of site personnel, operatives and visitors
- (b) loading and unloading of plant and materials
- (c) storage of plant and materials
- (d) programme of works (including measures for traffic management)

(e) provision of boundary hoarding behind any visibility zones

has been submitted to and approved in writing by the Local Planning Authority. The approved statement shall be implemented during the construction of that part.

Reason: To ensure that the proposed development should not prejudice highway safety, nor cause inconvenience to other highway users, and accord with the National Planning Policy Framework 2018 and policy CC2 of Spelthorne Borough.

24. DEMOLITION METHOD STATEMENT

No demolition pursuant to this permission shall take place within any part, until a demolition method statement (DMS) detailing the proposed methodology for demolishing the existing structures within that part and the mitigation measures to be implemented has been submitted to and approved in writing by the Local Planning Authority. The DMS shall include a Pre-Demolition Asbestos Survey. No demolition works shall take place otherwise than in accordance with the approved DMS.

Reason: To prevent pollution in accordance with policies SP6 and EN15 of the Spelthorne Borough Core Strategy and Policies Development Plan Document 2009.

25. WASTE MANAGEMENT

No part of the development hereby permitted shall be begun until a site waste management plan (including a scheme for recycling and/or disposing of waste resulting from demolition and construction works) for that part has been submitted to, and approved in writing by, the local planning authority. The development hereby permitted shall thereafter be carried out in accordance with the approved management plan.

26. LIGHTING

Prior to the commencement of any part of the development a lighting scheme (including a programme of implementation and ensuring that the main beam angles of all external lighting units are below 70° from vertical and light trespass received at the boundary residential properties is no more than a maximum of 5 lux m², unless otherwise agreed with the Local Planning Authority) in respect of that part shall be submitted to and approved in writing by the LPA. The scheme shall be carried out as approved

Reason: To protect residential amenity and bat habitat in accordance with Policy EN1 of the Core Strategy and Policies Development Plan Document.

27. BACKLOTS

Prior to the first use of the external areas and land within the site for outdoor filming pursuant to this permission, a management and operational plan for those parts of the site shall be submitted to and approved in writing by the Local Planning Authority.

The plan shall include details of the management and mitigation of the impacts of outdoor filming (including noise disturbance, artificial lighting and parking and access requirements on adjacent residents and ecology within the site). These external areas shall not be used for outdoor filming otherwise than in accordance with the approved plan.

Reason: To protect residential amenity and bat habitat in accordance with Policy EN1 of the Core Strategy and Policies Development Plan Document.

28. USE

The development hereby permitted shall only be used for the production of film, television and media content and related education and skills training and support facilities.

Reason: The application represents inappropriate development in the Green Belt for which the specified use represents the very special circumstances.

29. SuDS

The development hereby permitted shall not commence until details of the design of a surface water drainage scheme have been submitted to and approved in writing by the planning authority. The design must satisfy the SuDS Hierarchy and be compliant with the national Non-Statutory Technical Standards for SuDS, NPPF and Ministerial Statement on SuDS. The drainage details shall include:

- a) Evidence that the proposed solution will effectively manage the 1 in 30 & 1 in 100 (+40%) allowance for climate change storm events, during all stages of the development (Pre, Post and during), associated discharge rates and storages volumes shall be provided using a Greenfield discharge rate of 1.7 litres/sec/hectare for the existing 'undeveloped areas' of the site. A minimum of a 20% reduction should be applied to the existing studios redevelopment with justification of why a lower reduction cannot be achieved (as per the SuDS proforma or otherwise as agreed by the Local Planning Authority).
- b) Detailed drainage design drawings and calculations to include: a finalised drainage layout detailing the location of drainage elements, pipe diameters, levels, and long and cross sections of each element including details of any flow restrictions and maintenance/risk reducing features (silt traps, inspection chambers etc.).
- c) Details of how the drainage system will be protected during construction and how runoff (including any pollutants) from the development site will be managed before the drainage system is operational.
- d) Details of drainage management responsibilities and maintenance regimes for the drainage system.
- e) A plan showing exceedance flows (i.e. during rainfall greater than design events or during blockage) and how property on and off site will be protected.

Prior to the first occupation of the development, a verification report carried out by a qualified drainage engineer must be submitted to and approved by the Local Planning Authority. This report must demonstrate that the drainage system has been constructed as per the agreed scheme (or detail any minor variations), provide the details of any management company and state the national grid reference of any key drainage elements (surface water attenuation devices/areas, flow restriction devices and outfalls).

Reason: To ensure the design meets the national Non-Statutory Technical Standards for SuDS and the final drainage design does not increase flood risk on or off site.

30. SURFACE WATER DRAINAGE

No infiltration of surface water drainage into the ground at Shepperton Studios, Studios Road, Shepperton, TW17 0QD is permitted other than with the written consent of the

Local Planning Authority. Any infiltration shall be carried out in accordance with such consent.

Reason: To prevent deterioration of the Principal and Secondary Aquifer in line with paragraph 170 of the National Planning Policy Framework.

NOTE: The use of infiltration drainage should specifically be avoided in the areas of the historic and authorised landfills and in those areas where contamination may be encountered during the site investigation.

31. UPDATED FLOOD RISK

The development hereby permitted shall not be commenced until an updated Flood Risk Assessment is submitted to and approved in writing by the Local Planning Authority. Any mitigation measure(s), as identified in the approved updated Flood Risk Assessment, shall be fully implemented prior to first occupation of the development hereby permitted or within such other period as may be agreed, in writing, by the local planning authority.

Reason: This condition is sought in accordance with paragraph 163 of the National Planning Policy Framework (NPPF):

1. To prevent flooding elsewhere by ensuring that storage of flood water is provided.
2. To reduce the risk of flooding to the proposed development and future occupants for the lifetime of the development.

32. RIVER ASH BRIDGES

No development shall commence until a detailed design plan (including a programme of implementation) for any proposed vehicular or pedestrian bridge across the main River/s Ash has been submitted to, and approved in writing by, the local planning authority. The bridge(s) shall be a clear spanning structure with the abutment set back 8 metres from the top of the riverbank. The bridge(s) shall not be constructed otherwise than in accordance with the approved detailed design.

Reason: This condition is sought in accordance with paragraph 163 of the National Planning Policy Framework (NPPF), to prevent flooding elsewhere by ensuring that storage of flood water is provided.

33. RIVER ASH BUFFERS FOR FLOODING / DRAINAGE

No development shall take place until a scheme for the provision and management of no less than a 10 metre wide buffer zone alongside that part of the main River Ash within the application site, and no less than a 5m wide buffer alongside all other watercourses and proposed ponds within the application site shall be submitted to and agreed in writing by the local planning authority. Thereafter the development shall not be carried out otherwise than in accordance with the approved scheme and any subsequent amendments shall be agreed in writing with the local planning authority. The scheme shall be free from built development including lighting, domestic gardens and formal landscaping; and demonstrate a net biodiversity gain over the existing position. The scheme shall include:

- plans showing the extent and layout of the buffer zone;
- details of any in channel river enhancements;
- details of any proposed planting scheme being native species of local genetic provenance;

- details demonstrating how the buffer zone will be protected during development and managed/maintained over the longer term including production of a detailed management plan;
- details of any proposed footpaths, fencing and lighting within the buffer zone; and
- details of any new wetland habitat creation within the buffer zone, including proposed planting mixes and establishment regimes.

Reason: Development that encroaches on watercourses and wetland habitats has a potentially severe impact on their ecological value. For example, inappropriate habitat management and artificial lighting schemes within buffer zones can undermine the wildlife value and migration connectivity and integrity. Land alongside watercourses and wetland features is particularly valuable for wildlife and it is essential this is protected. This condition is supported by the National Planning Policy Framework (NPPF), paragraph 170 which recognises that the planning system should aim to conserve and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. The Natural Environment and Rural Communities Act which requires Local Authorities to have regard to nature conservation and article 10 of the Habitats Directive which stresses the importance of natural networks of linked corridors to allow movement of species between suitable habitats, and promote the expansion of biodiversity. Such networks may also help wildlife adapt to climate change and will help restore watercourses to a more natural state as required by the Thames river basin management plan.

34. EA LANDSCAPE MANAGEMENT PLAN

No development of the scheme or any part of the scheme shall commence until a landscape management plan, including long term design objectives, management responsibilities and maintenance schedules for all relevant landscaped areas has been submitted to and approved in writing by the local planning authority. The landscape management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the local planning authority. The scheme shall include the following elements:

- details of any proposed ponds and/or wetland features including cross-sections showing bank profiles and gradients, construction materials being used and water source;
- details of any proposed planting scheme being native species of local genetic provenance;
- a programme of implementation;
- details demonstrating how the landscape will be managed/maintained over the longer term including production of a detailed management plan; and
- a detailed method statement for removing or the long-term management or control of invasive non-native plants. The method statement shall include measures that will be used to prevent the spread of any identified invasive plants during any operations e.g. mowing, strimming or soil movement. It shall also contain measures to ensure that any soils brought to the site are free of the seeds / root / stem of any invasive plant listed under the Wildlife and Countryside Act 1981, as amended.

Reason: This condition is supported by the National Planning Policy Framework (NPPF), paragraph 170 which recognises that the planning system should aim to conserve and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. The Natural Environment and Rural Communities Act which requires Local Authorities to have regard to nature conservation and article 10 of the Habitats Directive which stresses the importance of natural networks of linked corridors to allow movement of species between suitable habitats, and promote the expansion of biodiversity. Such networks may also help wildlife adapt to climate change and will help restore watercourses to a more natural state as required by the Thames river basin management plan.

NOTE: Our records indicate there are localised records of both Giant Hogweed (*Heracleum mantegazzianum*) and Japanese knotweed (*Fallopia japonica*) on site. Invasive non-native plants were not picked up within the Ecological appraisal report or other documents. If there is an existing treatment programme in place, this should be submitted for the Local Authority to review and approve as fit for purpose (and clearly state whether for management or eradication). If a targeted survey, or survey note is not available it is strongly advised that this is carried out, and to ensure that it is done so within a suitable seasonal timeframe to allow for positive identification.

35. CONTAMINATION

No development shall take place until:-

- a) Where any such potential sources and impacts have been identified, a site investigation has been carried out to fully characterise the nature and extent of any land and/or groundwater contamination and its implications. The site investigation shall not be commenced until the extent and methodology of the site investigation have been agreed in writing with the Local Planning Authority.
- b) A written method statement for the remediation of land and/or groundwater contamination affecting the site shall be agreed in writing with the Local Planning Authority prior to the commencement of remediation. The method statement shall include an implementation timetable and monitoring proposals, and a remediation verification methodology.

The site shall be remediated in accordance with the approved method statement, with no deviation from the statement without the express written agreement of the Local Planning Authority.

Reason: To prevent deterioration of the Principal and Secondary Aquifer in line with paragraphs 170 & 178 of the National Planning Policy Framework.

36. VERIFICATION REPORT

No part of the development shall be brought into use until a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include: (a) results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met; and (b) a plan for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency

action, as identified in the verification report. The plan shall be implemented as approved.

Reason: To prevent deterioration of the Principal and Secondary Aquifer in line with paragraphs 170 & 178 of the National Planning Policy Framework.

37. PILING

Piling using penetrative methods shall not be carried out other than with the written consent of the local planning authority. All piling shall be carried out in accordance with such consent.

Reason: To ensure that the proposed development does not harm groundwater resources in line with paragraph 170 of the National Planning Policy Framework.