

Planning Committee

05 January 2022



Application No.	21/01547/FUL
Site Address	Shepperton Studios, Studios Road, Shepperton, TW17 0QD
Applicant	Shepperton Studios Ltd,
Proposal	Use of 6 acres of land for backlot in association with Shepperton studios, including the construction of utility buildings, security barriers and guard shelters, with associated enabling works, access, landscaping, surface parking and amended car park access at land north of Shepperton Studios
Case Officer	Russ Mounty
Ward	Laleham and Shepperton Green
Called-in	N/A

Application Dates	Valid: 04/10/2021	Expiry:03/01/2022	Target: Extension of Time agreed
Executive Summary	<p>This proposal seeks to alter areas G13 and F14 of the Outline approval, providing a 6 acre backlot space, with alterations to the north car park and landscaping. The approved outline scheme and subsequent reserved matters application proposed a car park on area G13 and an extension to the existing surface car park on area F14. The current proposal seeks to create a backlot on area G13 and revise the existing surface car park, including the extension element into the backlot.</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. The protection of the Green Belt is a national policy objective, and the Government advice in the National Planning Policy Framework 2021 attaches substantial weight to it.</p> <p>The proposal would not affect the parking provision levels throughout the site as this would be accommodated in revised parking provision elsewhere within the site. In addition, there would be no additional traffic generation as the provision of backlots was included in the outline application.</p>		

	<p>Although the proposal does encroach further into the Green Belt, this is a relatively small encroachment, that would not have a material impact on the 5 purposes of the Green Belt. Given the national economic benefits of the wider scheme and the current requirement for the proposed use both nationally and globally, in combination with the commitment to biodiversity enhancements, secured through legal agreement, it is considered that the benefits of the proposal would outweigh the harm to the Green Belt by reason of inappropriateness, and the other harm resulting from the proposal and that 'very special circumstances' exist.</p>
Recommended Decision	<p>Approve the application subject to a S106 agreement and conditions as set out at Paragraph 8 of the Report.</p>

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 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 EN8: Protecting and Improving the Landscape and Biodiversity
 - 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
- 1.2 It is also considered that the following Saved Local Plan policies are relevant to this proposal:
- GB1 (Green Belt)
- 1.3 The advice contained within the National Planning Policy Framework (NPPF) 2021 is also relevant.

2. Relevant Planning History

- 2.1 The site has the following planning history:

Ref. No.	Proposal	Decision and Date
20/01108/RMA	Application for approval of reserved matters for land to the north of the River Ash comprising details of sound stages, production buildings including offices and workshops, security hut, backlot and associated infrastructure,	Approved 03.02.2021

	car parking, landscaping and other works pursuant to condition 2 of planning permission 18/01212/OUT dated 4th July 2019	
18/01212/OUT	Outline planning permission with all matters reserved (except for principal points of access) for the redevelopment and expansion of Shepperton Studios, comprising the <i>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.</i>	Grant Conditional 04.07/2019
21/01182/FUL	Construction of a workshop (plot 1.4), utility building and security barriers, turnstile and guard shelter, with associated enabling works, access and parking at Shepperton North West	Awaiting Decision

3. Description of Current Proposal

Background

- 3.1 This application has been made by Shepperton Studios Ltd which is part of the Pine wood Studios Group. 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 have since then been extended significantly. The approved expansion offers a wide range of facilities that are essential for film and high end television (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
- 3.2 In the outline application the applicant stated they were a “market leader with a global reputation” and a provider of “a world class range of facilities and services to the film and HETV 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.

Proposal

- 3.3 The site is bounded by the Queen Mary Reservoir to the north, which incorporates a 10m grassed embankment, Studios Estate to the south (adjacent to the existing studio site), an area of land forming part of the studios expansion to the west and Studios Road to the east.
- 3.4 The proposed development seeks the use of 6 acres of land, previously approved as surface car park and open land, for backlot in association with Shepperton studios, including the construction of utility buildings, security barriers and guard shelters, with associated enabling works, access, landscaping, surface parking and amended car park access at land north of Shepperton Studios.
- 3.5 The proposal includes:
- The creation of 6 acre backlot north of the Studios Estate
 - A security hut and vehicular barriers located at the south-eastern end of the access road to manage access to the studio site
 - A private electrical substation to the west of the backlot
 - The construction of an attenuation pond to the west of the proposed backlot
 - An adjacent 11KV switch room building, approved as part of the North West reserved matters application, will be reduced in size and repositioned to suit the revised access arrangements;
 - Additional pedestrian turnstile and access gates at the main entrance to the existing Studio site.
 - The relocation of the internal link road further north
 - The reconfiguration of the Studios Estate junction
 - The relocation of the access to the existing carpark to the east.

An extract of the proposed site layout is shown below.



4. Consultations

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

Consultee	Comment
Lead local Flood Authority	No Objection subject to conditions
County Highway Authority	No response received
Environment Agency	Recommend EA standing advice
Biodiversity Officer	No Objection subject to conditions
Environmental Health	No Objection subject to conditions
Surrey Wildlife Trust	Recommends clarification and technical revisions (as discussed below)
Arboricultural Officer	No Objection

5. Public Consultation

5.1 A total of 32 properties were notified of the planning application, a statutory site notice was displayed, and the application was advertised in the local press. One letter of objection has been received raising the following issues:

- Studios and contractors lack of respect of residential proximity
- Inappropriate location of ancillary construction facilities
- Proximity of vehicle parking to residential properties
- Traffic generation and highway safety

6. Planning Issues

- Principle of Development
- Green Belt
- Design and layout
- Highway Issues
- Parking
- Impact on Residential Amenity
- Air Quality
- Landscape
- Ecology
- Flooding and Drainage
- Contaminated Land
- Noise
- Lighting
- Other Considerations

7. Planning Considerations

Principle of Development

7.1 The principle of expanding Shepperton Studios was approved in July 2019, under application 18/01212/OUT. The first reserved matters submission was required within 2 years of the date of the permission, which was received on

23rd September 2020 under reference 20/01108/RMA and works have commenced.

- 7.2 The outline permission approved 112,849 sqm of net additional floorspace across the expansion site as a whole.
- 7.3 The proposal incorporates development zone F14 (car park) and G13 (car park) identified on the Composite Parameters plan approved under 18/01212/OUT. However, it also encroaches into the open space and landscaped areas to the west and north of the development zones.
- 7.4 Therefore, whilst the principle of the expansion of the Shepperton Studios has been considered and agreed, this proposal varies the uses within the approved development zones and further encroaches into the Green Belt, reducing the approved landscape area and reducing biodiversity opportunities.

Green Belt

- 7.5 The site lies within the Green Belt and represents the two car parks and open landscape that was approved under 18/01212/OUT on 4th July 2019.
- 7.6 The area was identified as D13 and F14 on the PP.4 Development Zones Plan and has been subject to a reserved matters approval under 20/01108/RMA
- 7.7 Paragraph 137 of the National Planning Policy Framework (2021) 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 previous iterations of the NPPF.
- 7.8 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. Because of the inconsistency with the NPPF, the impact of the development on the Green Belt should be considered primarily against the policies of the NPPF.
- 7.9 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.
- 7.10 The use of this area of land for a car park and open space was assessed as part of the wider expansion plans under 18/01212/OUT and the reserved matters approval.

Green Belt - Inappropriate Development

- 7.11 Paragraph 137 of the National Planning Policy Framework (2021) 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 previous iterations of the NPPF.

- 7.12 Paragraph 148 of the NPPF states 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.’*
- 7.13 The use of the land as a backlot falls within the definition of inappropriate development and this was considered in respect of the outline application. Both the outline and reserved matters approvals carry substantial weight in the consideration of this proposal.

Green Belt - Openness

- 7.14 The essential characteristics of Green Belt land is its openness and its permanence. These characteristics serve all five purposes of the Green Belt against which the proposed development will be assessed.
- 7.15 Openness is not defined in the NPPF but is commonly taken to be the absence of built development. It is acknowledged that there is an important distinction between openness as being the absence of built development 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.
- 7.16 The consideration of the outline application for the expansion of the Studios recognised that the proposal would have an impact on the openness of the Green Belt. Part of this site was identified as a parking area and reserved matters have been approved, however it is the additional harm deriving from the proposed use and inclusion of the open landscape that must now be considered.

Green Belt - Conclusion

- 7.17 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. In isolation, the provision of land for use as backlot within the Green Belt would also represent clear conflict with two of the five Green Belt purposes, as defined in the NPPF.
- 7.18 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.
- 7.19 However, there is an existing outline approval for an expansion to the studios and a reserved matters approval for the use of the majority this site as a surface car park.

- 7.20 Although the Planning Statement indicates that this application sits wholly within the areas defined as Development Zones on the approved parameter plans, this is incorrect as the north-west edge of the site was outside any development zone approved in the outline application.



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- 7.21 The need for the studios expansion was assessed during the outline stage and it was agreed, that on balance, this outweighed the harm. However, this proposal seeks to encroach further into the Green Belt.
- 7.22 The Planning Statement suggests that there are material considerations that should be considered a 'very special circumstances'. However, the demonstration of very special circumstances for the outline application does not in itself justify further encroachment into Green Belt and little weight is given to this consideration. The extant permission carries some weight, but the proposal encroaches further into the Green Belt and it cannot therefore justify the current proposal, without additional benefits and limited weight is therefore afforded to this consideration. It is accepted that the backlot is an important element of the overall studios redevelopment, however the expansion was 39ha and included a backlot in the southern section that was revised to a car park. A new backlot could be relocated within the existing approved development areas without further impacting the Green Belt, but this was not done for commercial and operational reasons, and therefore little weight is accorded to this consideration.
- 7.23 It is acknowledged that the studios development would contribute to national objectives of economic growth and support for the film industry, and that the risks identified in respect of the outline application are reduced. As such, given the ability if this proposal to complete the comprehensive development of the studios, it is concluded that the harm to the Green Belt and other identified harm, addressed below, is clearly outweighed by the national economic argument and the support for Government policy aims.

Design & Layout

- 7.24 The 6 acre backlot would comprise a level space of crushed stone, similar to that constructed to the west. There would be landscaping around the

boundary, but with the exception of the southern boundary with Studios Estate, this would be limited.

- 7.25 The security hut and barriers would reflect those agreed in connection with the Reserved Matters application for the area north of the River Ash (20/01108/RMA).
- 7.26 The private substation would measure approximately 12.m x 5.5m with a mono-pitch roof at a maximum height of 3.6m. Constructed of concrete block under a profile metal roof.
- 7.27 The reserved matters application showed two substation buildings within the area, one to the northeast at the boundary with the reservoir and the other to the northwest on the edge of the parking area. One of these was larger than the proposed substation, the other smaller and both incorporated shallow pitched roofs.
- 7.28 The proposed attenuation pond would be set within the area of existing species rich grassland previously set aside for biodiversity net gain. The area was to be overseeded with yellow rattle to improve biodiversity.
- 7.29 The 11 Kw switch room would measure approximately 9.3m x 6.35m with a mono-pitch roof at a maximum height of 3.7m. Constructed of concrete block under a profile metal roof, it would be located adjacent to the revised north car park's north-west entrance.
- 7.30 The approved link road curved around the north of the surface carpark and retained a landscaped edge to the boundary with the Queen Victoria Reservoir. The current proposal uses tighter curves which require additional roadway to accommodate larger vehicles. The distance to the boundary is significantly reduced.
- 7.31 The provision of additional pedestrian turnstile and access gates would reflect those already existing on the studios side and would allow greater flexibility for the movement of pedestrians from the surface car park to the studio, thereby encouraging the use of the car park area rather than on-street parking.
- 7.32 The reconfiguration of the Studios Estate junction has been agreed in principle with the County Council and whilst this proposal would alter the geometry, it would have no additional impact on the operation of the highway for road users or pedestrians. It would, however, require a s278 agreement with the County Highway Authority.
- 7.33 The relocation of the access to the existing carpark to the east would align this better with the main access to the existing studios and would encourage the use of the surface car park area rather than on street parking.
- 7.34 Overall, the design and layout of the proposal is considered to be appropriate. It is generally in accordance with that already approved through the Reserved Matters applications, with a number of enhancements that are likely to improve the flow of pedestrians and vehicles in Studios Road.

Highway Issues

- 7.35 The Transport Assessment states that the parking levels across whole of the Shepperton Studios sites would be consistent with the minimum 2,595 spaces identified in the outline consent.

- 7.36 It also indicates that the original Traffic Assessment included the operation of two backlots at the site and allowed for the pro-rata increase in traffic generation for all development aspects, including any modest traffic impacts of backlot operation, in line with the ratio of floorspace increase from 83,560sqm to 194,409sqm.
- 7.37 It concludes that the proposed new north backlot would not increase the amount of backlot space above that considered during the outline application and traffic generation is therefore intrinsically included and robustly over-estimated within the original Traffic Assessment agreed with the County Highway Authority at the outline consent stage, alongside the agreed mitigation package.
- 7.38 Whilst the County Highway Authority has not responded to the consultation, or subsequent requests, the proposal does not introduce additional floorspace and would not reduce the overall parking availability on site. The provision of backlot's was included in the original Traffic Assessment and there is not considered to be any additional material impact on traffic generation. The LPA is therefore satisfied that the proposal would not raise any new traffic considerations.

Parking

- 7.39 The approved surface car park (G13) that would be replaced with the backlot area was to provide 504 spaces with the north car park extension to provide an additional 291 spaces.
- 7.40 The Transport Statement provided with this proposal indicates that to ensure that the levels of car parking across the Shepperton Studios expansion are consistent with the minimum 2,595 spaces required under Condition 13 of the outline consent, a new 684 space Multi-Storey Car Park (MSCP) is proposed in Shepperton South to off-set the loss of car parking as a result of the new north backlot.
- 7.41 This has been submitted as a reserved matters application as it would sit within the parameters agreed for the outline application (18/01212/OUT).
- 7.42 Additional surface car parking is also proposed in respect of planning application (21/01182/FUL). This would provide an additional 154 spaces within the north west studio hub and would address the 111 shortfall for the studio expansion overall, ensuring the studios does not add to parking stress in the surrounding community. There would be no change to the provision of disabled spaces within the site.
- 7.43 The proposed site plan indicates that the existing north car park between Studios Road and the Queen Marys Reservoir would be reconfigured to provide 452 parking spaces. The access would be revised to a location further east than the existing, with new pedestrian access points, to discourage parking within Studios Road. This would ensure that the parking provision within this car park remains as existing.
- 7.44 Overall, the proposal has considered the parking requirements for the operational aspects of the studios and ensured that the parking provision would meet the requirements set out in the outline application.

Landscape

7.45 Policy EN1 of the CS&P DPD refers to high standards of design and layout and the incorporation of landscaping to enhance the setting of the development.

7.46 Policy EN8 refers to the protection and improvement of the landscape and biodiversity.

7.47 The submitted landscape report dated September 2021 states that the updated strategy develops and enhances the key strands of the original outline strategy, particularly in relation to:

- An enhanced woodland framework - Additional woodland planting is proposed to create meaningful woodland corridors, integrate the development and filter views where required. Existing woodland will be brought under appropriate management.
- The creation of ecological corridors - Additional ecological corridors are proposed to enhance and strengthen ecological connectivity.
- Integrated SuDS provision - Extensive new areas of SuDS have been provided away from sensitive landscape features to create multi-functional assets with landscape and ecological benefits

7.48 In terms of the landscape proposals the submitted report identifies the following features:

Access Road – This is sized to accommodate large vehicles accessing the proposed backlot, the north west studio hub development and studios south of the river. It is simply and consistently treated with a grass verge along its northern edge, and a native hedge with scattered trees along its southern edge.



Backlot - The backlot is an open area for shooting outdoor scenes in film-making or space for temporary set construction. The backlot would be secured by a timber palisade fence and have a native hedge and tree line along its western, northern and eastern boundary. It would be surfaced with stone similar to that on the northwest backlot area.

The southern boundary with Studios Estate incorporates a 1.0-1.5m high landscape bund with tree planting to filter views between the two.

North Wetland - This area would provide an attenuation facility for the proposed backlot and access road. Design proposals extend existing landscape character to create a range of dry, damp/wet habitats with the latter having dual use as attenuation for runoff from the backlot. The runoff would be collected by filter drains along the boundary of the backlot and fed into a basin. The basin's interior would have a sloped base and areas of over-deepening to provide a degree of near-permanent standing water/marshy habitat with the base sown and managed as damp grassland.



Car parking - Both ends of the existing car park would be slightly amended/extended. The north western vehicular entrance would be closed and parking bays reconfigured to accommodate the revised access road. Screen hedges would incorporate the revised security fencing along the western elevation. Pedestrian traffic between the car park and the existing studio would be by a footway, broadly where the existing vehicular access is currently. A small number of parking spaces, a new vehicular entrance and associated security cabin are proposed at the eastern end of the car park.



- 7.49 The original ecological appraisal submitted with the outline planning application concluded that the majority of land uses within the expansion site were of negligible value, and that the overall ecological value was poor. However, it gave no consideration to the ability, or requirement, of the restoration plans to provide high quality environments and assumed a situation, after mineral extraction and with minimal environmental management, without including the ecological benefits that were required and promised through the restoration plans.
- 7.50 The LPA therefore considered that the weight afforded to the applicant's baseline position was limited since the site's ecology would have been considerably improved had the restoration plans been implemented (as required) and the site managed effectively.
- 7.51 The submitted landscape report for this application has continued to use this unjustified and inappropriate baseline that the Council has considered to be of little weight and as such the report is considered to be of limited contextual value with a conclusion based on poorly justified assumptions. However, in terms of the provision of landscape elements within the site, the report, together with the General Arrangement plan identifies a proposed landscape framework.
- 7.52 The access road would be treated in a similar manner to that approved in the reserved matters application, albeit this would be longer than previously approved.
- 7.53 The backlot itself would also be treated in a similar manner to that approved and constructed to the west.
- 7.54 The landscaped area between the backlot and Studios Estate would remain as intended when the area was approved as a surface car park and the Studios are working with residents to secure appropriate screening opportunities for individual properties.
- 7.55 The woodland and hedge planting that create a network of linear ecological features were part of the reserved matters application and no additional elements are proposed. Whilst they create connectivity opportunities the overall area of green space has been reduced by the proposal.
- 7.56 The North Wetland area encroaches on the North Meadow, which was semi-improved neutral grassland, with a proposal to enhance it further. The creation of the Wetland results from the requirement for SUDs and results in further loss of semi-improved neutral grassland. Although it would create new habitat opportunities, this habitat has already been created to the north and east of the existing backlot.
- 7.57 The landscaping within the revised car park would be similar to that approved under the reserved matters application.
- 7.58 As with previous reports, this landscape report suggests that 'This material demonstrates the scheme's relatively light touch environmentally, and the landscape and ecological benefits delivered by the scheme.' This continues to be considered simplistic, however the description of the proposed landscaping together with the General Arrangement Plan provides a landscape scheme for the proposed development, which is considered acceptable in landscape terms.

Ecology

- 7.59 Policy EN8 seeks to protect and improve the landscape and biodiversity of the Borough.
- 7.60 Paragraph 174 of the NPPF 2021 states that planning decisions should contribute to and enhance the natural and local environment. Paragraph 179 refers to habitats and biodiversity and identifies that planning should identify and pursue opportunities for securing measurable net gains for biodiversity.
- 7.61 Although the applicant refers to the Ecological Impact Appraisal submitted in support of the original expansion proposal for the Studios (18/01212/OUT) it should be noted that the LPA did not support all of its conclusions.
- 7.62 The submitted report continues to indicate that habitat within the site is of low ecological value and references the wider scheme design for the expansion of Shepperton Studios which includes the creation of wetlands, ponds, and scrub and species rich grasslands at the site periphery.
- 7.63 The applicant submitted an ecological assessment which they state builds on previous ecology surveys and assessments at the Site and wider area.
- 7.64 The assessment states that given the nature of the site, deterioration and large-scale construction disturbance, it was not considered necessary to update the search for biological records. However, the mitigation and enhancement measures associated with the outline application and subsequent reserved matters applications are relevant to the site.
- 7.65 The assessment concludes that habitats within the site are of low ecological value, but do have limited potential to support bats, breeding birds, reptiles and badgers. The mitigation measures detailed in the report are required to minimise risk to these species and providing the ecological mitigation and enhancements are carried out, the application will be compliant with ecological national and local planning policy and legal obligations.
- 7.66 Condition 17 of the outline approval (18/01212/OUT) sought a scheme for the enhancement of the site for biodiversity purposes. The condition was discharged under 18/01212/DC3 but incorporated the improvement of the semi-improved neutral grassland now incorporated into the backlot and altered to provide the SuDs.
- 7.67 The proposal is therefore considered to have an adverse impact on the biodiversity of the site and the mitigation measures suggested are not considered to clearly demonstrate that the proposal would be compliant with policy or the requirements of the condition attached to the outline approval.
- 7.68 However, the applicant is seeking to provide a scheme of biodiversity enhancements, which may include an off-site scheme and has stated that there is a commitment to delivering a minimum 5% biodiversity net gain. Were this scheme secured then the proposal would demonstrate an improvement over the existing situation and contribute to the overall enhancement of biodiversity in the borough.
- 7.69 Surrey Wildlife Trust (SWT) has been consulted on the application and has noted some inconsistencies in the Ecological Appraisal report.
- 7.70 SWT noted that the bat survey for two identified trees was carried out on 28th July 2021 in "moderate rain" which is not optimal in accordance with the Bat

Survey Guidelines and this limitation has not been addressed in the report. All species of bat and their roosts are protected under Schedule 2 of the Conservation of Habitats and Species Regulations 2017, as amended in addition to being afforded additional protection under the Wildlife and Countryside Act 1981, as amended.

- 7.71 Whilst the LPA acknowledges that an appropriate survey should be undertaken in respect of these two trees in suitable weather conditions during the active bat season, to ensure the legislation is addressed, the trees are shown to be retained on the landscape masterplan and a similar proposal has been approved in generally the same location.
- 7.72 In order to mitigate the impact on biodiversity, outweigh the harm to the Green Belt and secure the applicant's commitment to enhancements, a s106 legal agreement is recommended for an appropriate scheme prior to development.

Flooding

- 7.73 Policy LO1 seeks to reduce flood risk and its adverse effects on people and property in Spelthorne.
- 7.74 The Flood Risk Assessment (FRA) was reviewed by the Environment Agency during the outline application and as a result of the planning conditions attached.
- 7.75 The applicant has provided a flood risk assessment to address the proposal. The assessment concludes that model shows that the proposed new backlot area is shown to flood during the 1% Annual Exceedance Probability + 35% climate change scenario. However, they consider the backlot to be classified as "water compatible" and this is therefore deemed acceptable and not detrimental when compared to the approved FRA.
- 7.76 The EA was consulted on this application and has advised that the environmental risks in this area relate to the site lying within Flood Zone 2, the requirement for groundwater protection and the other consents.
- 7.77 The impact on Flood Zone 2 was considered in the outline application and subsequent discharge of condition. The use of the site as a backlot, rather than a car park, has no additional material impact on flood risk. A condition is recommended in respect of groundwater protection as was included in the outline application.
- 7.78 The Lead Local Flood Authority was consulted and has confirmed that it is satisfied that the proposed drainage scheme meets their requirements subject to the conditions recommended.
- 7.79 Therefore, the LPA is satisfied that there are no flood risk issues with this particular proposal.

Air Quality

- 7.80 The potential impacts on air quality were considered with the previous temporary applications and within the wider context of the Studios expansion (18/01212/OUT).

- 7.81 The potential effects of this proposal would have no materially adverse impact on air quality over the existing situation and that of the proposed expansion and would comply with policies SP6 and EN3 of the CS&P DPD.
- 7.82 The Council's Environmental Health Officer (Air Quality) is satisfied with the proposal in respect of air quality issues

Lighting

- 7.83 The applicant has submitted a lighting layout plan that reflects that approved under 18/01212/DC3 for the north west area.
- 7.84 Surrey Wildlife Trust (SWT) has advised that nocturnal species are known to be present at the development site and are sensitive to an increase in artificial lighting of their roosting, foraging places and commuting routes.
- 7.85 SWT has noted that the submitted lighting layout includes the use of lighting that is contrary to best practice guidance by the Bat Conservation Trust and the Institute of Lighting Professionals 3 (2018), which recommends warm white lighting.
- 7.86 In accordance with the NPPF, SWT considers that the applicant should ensure that the proposed development will not result in a net increase in external artificial lighting at primary bat foraging and commuting routes across the development site.
- 7.87 In addition SWT considers that additional vegetative screens should be incorporated into the landscaping, to prevent light spillage onto the proposed attenuation pond and wetland area, which is highlighted in the Ecological Appraisal report as an enhancement feature for foraging and commuting bats.
- 7.88 Since this is a full application and the roadway has extended into the open, closer to the trees, a lighting condition is recommended. In addition, given the private nature of the internal roadway and the studios expansion's location within Green Belt an informative has been recommended to encourage more appropriate lighting throughout the Shepperton Studios expansion.

Equalities Act 2010

- 7.89 This planning application has been considered in light of the Equality Act 2010 and associated Public Sector Equality Duty, where the Council is required to have due regard to:
- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 7.90 The question in every case is whether the decision maker has in substance had due regard to the relevant statutory need, to see whether the duty has been performed.
- 7.91 The scale of the overall development at Shepperton Studios would provide a greater range of opportunities, including for those with protected

characteristics. The application site, land, uses and buildings nearby are likely to be used by people with protected characteristics and both the construction and operational use may have some level of impact on them. The proposal has sought to minimise impacts through landscaping, management plans, relocating services and access etc and consideration has been given to how the proposal will pay due regard to the Equalities Act.

Human Rights Act 1998

- 7.92 This planning application has been considered against the provisions of the Human Rights Act 1998.
- 7.93 Under Article 6 the applicants (and those third parties who have made representations) have the right to a fair hearing and to this end full consideration will be given to their comments.
- 7.94 Article 8 and Protocol 1 of the First Article confer a right to respect private and family life and a right to the protection of property, i.e. peaceful enjoyment of one's possessions which could include a person's home, and other land and business assets.

In taking account of the Council policy as set out in the Spelthorne Local Plan and the NPPF and all material planning considerations, Officers have concluded on balance that the rights conferred upon the applicant/ objectors/ residents/ other interested party by Article 8 and Article 1 of the First Protocol may be interfered with, since such interference is in accordance with the law and is justified in the public interest. Any restriction of these rights posed by the approval of the application is legitimate since it is proportionate to the wider benefits of such a decision, is based upon the merits of the proposal, and falls within the margin of discretion afforded to the Council under the Town & Country Planning Acts.

Neighbour Comments

- 7.95 The LPA was made aware of issues with the site contractors at the early stage of enabling works and this was resolved by the Studios. However, this contractor is no longer on site and the LPA has received no complaints regarding the main contractor.
- 7.96 This proposal would necessitate the relocation of the ancillary construction facilities in order to implement it.
- 7.97 The proposal would replace the approved car park with a backlot and incorporates a landscaped bund adjacent to the residential properties in Studios Estate.

Conclusion

- 7.98 The proposal seeks to alter the parameters set by the outline approval for the areas G13 and F14 identified in the approved parameters plans. The proposal would not affect the parking provision levels throughout the site or result in additional traffic generation.

- 7.99 The proposal constitutes inappropriate development and this in itself, carries substantial weight against the merits of the scheme. In addition, the proposal will result in loss of openness in the Green Belt.
- 7.100 Although the proposal does encroach further into the Green Belt, this is a relatively small encroachment given the overall studios expansion, that would not have a material impact on the 5 purposes of the Green Belt. Given the national economic benefits of the wider scheme and the current requirement for the proposed use, in combination with the commitment to biodiversity enhancements, secured through legal agreement, it is considered that the benefits of the proposal would outweigh the harm to the Green Belt by reason of inappropriateness, and the other harm resulting from the proposal and that 'very special circumstances' exist..

8. Recommendation

- (A) To GRANT planning permission subject to the applicant first entering into an appropriate legal agreement in respect of the following:
1. To provide, prior to the commencement of any development, a scheme for the enhancement of off-site biodiversity, setting out how the gains will be obtained, monitored and maintained on an ongoing basis, has been submitted to, and approved in writing by, the local planning authority. The scheme shall be secured on an area of land within the Borough of Spelthorne, available for a period of not less than 30 years and provide for a minimum of 5% biodiversity net gain. The approved scheme of enhancement shall be implemented in accordance with the approved details and retained and managed thereafter.
 2. To pay the Council's reasonable costs for the preparation of the appropriate legal agreement.

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 proposal represents inappropriate development and has not provided an adequate scheme of biodiversity enhancements. It has therefore failed to demonstrate that the potential harm to the Green Belt and any other harm resulting from the proposal has been clearly outweighed by other considerations contrary to the NPPF 2021
- 2 The development fails to provide adequate measures to mitigate the loss of biodiversity at the site contrary to Policies SP6 and EN8 of the Core Strategy and Policies DPD 2009 and the principles set out in the National Planning Policy Framework 2021.

(B) In the event that the Section 106 agreement is completed to the satisfaction of the Local Planning Authority; GRANT subject to the following conditions: -

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason:-.This condition is required by Section 91 of the Town and Country Planning Act, 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2. The development hereby permitted shall be carried out in accordance with the following approved plans 3755-FBA-XX-XX-DR-A-0109001 P2 Site Location Plan Sept 2021, 3755-FBA-XX-XX-DR-A-0109003 P2 North Backlot - Proposed Site Plan Sept 2021, 3755-FBA-XX-XX-DR-A-0109004 P2 North Backlot - Boundary Treatment Sept 2021, 3755-FBA-XX-XX-DR-A-0109005 P2 North Backlot - Proposed security Hut Sept 2021, 3755-FBA-XX-XX-DR-A-0109006 P2 North Backlot - Proposed Cycle Storage Sept 2021, 3755-FBA-XX-XX-DR-A-0109007 P2 North Backlot - Electrical Substation Sept 2021, 3755-FBA-XX-XX-DR-A-0109008 P2 North backlot 11Kv Switchroom Sept 2021, LUC-10363-LD-PLN-1200 B Landscape Materplan, LUC-10363-LD-SEC -1260 B Detailed Sections - Studios Estate Boundary.

Reason:-.For the avoidance of doubt and to ensure the development is completed as approved.

3. The backlot site identified on Plan 3755-FBA-XX-XX-DR-A-0109003 Rev P2 shall only be used for filming between the hours of 7.00am and 9.00pm Monday to Saturday and may not be used on Sundays or Bank Holidays. Filming should cease at 8.00pm during the months October-March each year. There should be no night shooting outside these hours unless agreed in writing by the Local Planning Authority.

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

4. The construction and dismantling of sets and the associated vehicular activity within the backlot site identified on Plan Plan 3755-FBA-XX-XX-DR-A-0109003 Rev P2 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.

5. No part of the development hereby approved shall be begun until, a scheme for a minimum 20% enhancement of biodiversity on an off-site location, has been submitted to, and approved in writing by, the Local Planning Authority.

The approved scheme of enhancements shall be implemented within 6 months of the completion of the backlot hereby approved in accordance with the approved details.

Reason:-.To mitigate the impact on habitat and species that will 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 174 and 179 of the National Planning Policy Framework 2021.

6. No part of the development, including hardstanding and fences, shall be carried out within the landscape buffer zone shown on Plan 3755-FBA-XX-XX-DR-A-0109003 Rev P2.

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

7. Prior to the use of the backlot hereby approved, details of any proposed 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. The backlot shall not be used until the boundary treatment has been carried out in accordance with the approved details. Thereafter, 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.

8. No open storage of materials or waste and no placement of plant or machinery shall take place on the southern boundary of the backlot, adjoining the residential properties in Studios Estate.

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

9. 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.

10. 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.

11. Prior to the commencement of any part of the development hereby approved, a lighting scheme 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.

12. No infiltration of surface water drainage into the ground identified in this planning application 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 183 of the National Planning Policy Framework 2021.

13. The development hereby approved shall not be occupied unless and until at least 20% of the available parking spaces are provided with a fast charge socket (current minimum requirement: 7kw Mode 3 with Type 2 connector - 230 v AC 32 amp single phase dedicated supply) in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.

Reason:-.The above condition is required in recognition of Section 9 (Promoting Sustainable Transport) of the NPPF 2021.

14. Prior to the first use of the backlot hereby approved for outdoor filming pursuant to this permission, a management and operational plan for the backlot 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, parking and access requirements on adjacent residents and ecology within the site). The backlot shall thereafter only be used for filming in accordance with the approved management and operational plan, unless otherwise agreed with the Local Planning Authority in writing.

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

15. No development of the backlot shall take place until:-
- (i) A comprehensive desk-top study, carried out to identify and evaluate all potential sources and impacts of land and/or groundwater contamination relevant to the site, has been submitted to and approved in writing by the Local Planning Authority.
 - (ii) 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.
 - (iii) 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 protect the amenities of adjoining residents, users of the site and the environment from the effects of potentially harmful substances.

NOTE

The requirements of the above Condition must be carried out in accordance with current best practice. The applicant is therefore advised to contact Spelthorne's Pollution Control team on 01784 446251 for further advice and information before any work commences. An information sheet entitled "Land Affected By Contamination: Guidance to Help Developers Meet Planning Requirements" providing guidance can also be downloaded from Spelthorne's website at www.spelthorne.gov.uk.

In accordance with policies SP6 and EN15 of the Spelthorne Borough Core Strategy and Policies Development Plan Document 2009.

16. Prior to the first use of the backlot area, and on completion of the agreed contamination remediation works, a validation report that demonstrates the

effectiveness of the remediation carried out shall be submitted to and agreed in writing by the Local Planning Authority.

Reason:-.To protect the amenities of adjoining residents, users of the site and the environment.

17. 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 NonStatutory Technical Standards for SuDS, NPPF and Ministerial Statement on SuDS. The required drainage details shall include:

a) Evidence that the proposed final solution will effectively manage the 1 in 30 & 1 in 100 (+40% allowance for climate change) storm events, during all stages of the development. The final solution should follow the principles set out in the approved drainage strategy.

Associated discharge rates and storage volumes shall be provided using a maximum discharge rate of 5.3 litres/sec based on 1.70 l/s/ha.

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 reducing features (silt traps, inspection chambers etc.). Including details of any lining required to prevent groundwater ingress.

c) 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 from increased flood risk.

d) Details of drainage management responsibilities and maintenance regimes for the drainage system.

e) 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.

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.

18. 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 must demonstrate that the surface water 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), and confirm any defects have been rectified.

Reason:- To ensure the Drainage System is constructed to the National Non-Statutory Technical Standards for SuDS.

Informatives

- 1 Access by the Fire Brigade
Notice of the provisions of Section 20 of the Surrey County Council Act 1985 is hereby endorsed on this planning permission. Copies of the Section may be obtained from the Council Offices or from County Hall. Section 20 of this Act

requires that when a building is erected or extended, proper provision must be made for the Fire Brigade to have means of access to the building or to any neighbouring buildings.

There are also requirements relating to access and facilities for the fire service contained in Part B of the Building Regulations 2000 (as amended).

2 The applicant is advised that the Council will expect the following measures to be taken during any building operations to control noise, pollution and parking:

a) Work that is audible beyond the site boundary should only be carried out between 08:00hrs to 18:00hrs Monday to Friday, 08:00hrs to 13:00hrs Saturday with consideration of the nearby hospital and not at all on Sundays or any Public and/or Bank Holidays;

(b) The quietest available items of plant and machinery should be used on site. Where permanently sited equipment such as generators are necessary, they should be enclosed to reduce noise levels;

(c) Deliveries should only be received within the hours detailed in (a) above;

(d) Adequate steps should be taken to prevent dust-causing nuisance beyond the site boundary. Such uses include covering stockpiles and exposed topsoil, the use of hoses to damp down stockpiles of materials, which are likely to generate airborne dust, to damp down during stone/slab cutting; and the use of bowsers and wheel washes.

The applicant is encouraged to adopt the best practice mitigation measures for construction dust specified within the Institute of Air Quality Management Guidance on the Assessment of Dust from Demolition and Construction;

(e) There should be no burning on site;

(f) Only minimal security lighting should be used outside the hours stated above; and

(g) Building materials and machinery should not be stored on the highway and contractors' vehicles should be parked with care so as not to cause an obstruction or block visibility on the highway.

(h) The Pollution Control team should be consulted over placement of continuous PM10 monitoring and upon the methods of dust suppression and mitigation prior to the works.

Further details of these noise and pollution measures can be obtained from the Council's Environmental Health Services Unit. In order to meet these requirements and to promote good neighbourliness, the Council recommends that this site is registered with the Considerate Constructors Scheme - www.ccscheme.org.uk/index.php/site-registration

It should be noted that under the Environmental Protection Act 1990 Councils can serve an abatement notice on people responsible for statutory nuisances. This may require whoever's responsible to stop the activity or limit it to certain times to avoid causing a nuisance and can include specific actions to reduce the problem.

- 3 Thames Water's Reservoir Safety Team advise that with regards Queen Mary Reservoir protection, the embankments for the Queen Mary Reservoir rely on the surrounding ground for stability and support. It is therefore important that any proposed development within the nominal surveillance zone of 200 metres from toe of the reservoir embankments that involves excavations shall be submitted to Thames Water in order that the implications on the safety of the reservoir embankment can be properly assessed. This is particularly important for deep excavations and those that are anticipated to involve significant localised ground dewatering.
- 4 The applicant is reminded that under the Wildlife and Countryside Act 1981 (Section 1) it is an offence to take, damage or destroy the nest of any wild bird while that nest is in use or being built. Planning consent for a development does not provide a defence against prosecution under this Act. Trees and scrub are likely to contain nesting birds between 1 March and 31 July. Trees and scrub are present on the application site and should be assumed to contain nesting birds between the above dates unless survey has shown it is absolutely certain that nesting birds are not present.
- 5 The applicant is reminded that it is an offence to damage or destroy species protected under separate legislation. Planning consent for a development does not provide a defence against prosecution under European and UK wildlife protection legislation. You are advised that it may be necessary, shortly before development commences, for the applicant to commission an ecological survey from suitably qualified and experienced professionals to determine the presence or otherwise of such protected species. If protected species are found to be present, Natural England should be consulted.
- 6 It is the responsibility of the developer to ensure that the electricity supply is sufficient to meet future demands and that any power balancing technology is in place if required. Please refer to:
<http://www.beama.org.uk/resourceLibrary/beama-guide-to-electric-vehicle-infrastructure.html> for guidance and further information on charging modes and connector types.
- 7 The developer would be expected to agree a programme of implementation of all necessary statutory utility works associated with the development, including liaison between Surrey County Council Streetworks Team, the relevant Utility Companies and the Developer to ensure that where possible the works take the route of least disruption and occurs at least disruptive times to highway users.
- 8 The permission hereby granted shall not be construed as authority to carry out any works on the highway or any works that may affect a drainage channel/culvert or water course. The applicant is advised that a permit and, potentially, a Section 278 agreement must be obtained from the Highway Authority before any works are carried out on any footway, footpath, carriageway, verge or other land forming part of the highway. All works on the highway will require a permit and an application will need to submit to the County Council's Street Works Team up to 3 months in advance of the intended start date, depending on the scale of the works proposed and the classification of the road. Please see <http://www.surreycc.gov.uk/roads-and->

transport/road-permits-and-licences/the-traffic-management-permit-scheme. The applicant is also advised that Consent may be required under Section 23 of the Land Drainage Act 1991. Please see www.surreycc.gov.uk/people-and-community/emergency-planning-and-community-safety/flooding-advice.

- 9 All lighting throughout the proposed development and the wider Studios expansion should be designed in line with the Bat Conservation Trust guidelines on artificial lighting and wildlife (Bat Conservation Trust 2018) and the Institute of Lighting Professionals 3 to minimise adverse impacts on bats and other nocturnal animals in the surrounding area.
10. If proposed site works affect an Ordinary Watercourse, Surrey County Council as the Lead Local Flood Authority should be contacted to obtain prior written Consent. More details are available on our website. If proposed works result in infiltration of surface water to ground within a Source Protection Zone the Environment Agency will require proof of surface water treatment to achieve water quality standards. If there are any further queries please contact the Flood Risk Asset, Planning, and Programming team via SUDS@surreycc.gov.uk. Please use reference number LLFA-SP-21-0964 in any future correspondence.
11. The Town and Country Planning (Development Management Procedure) (England) Order 2015 Working in a positive/proactive manner

In assessing this application, officers have worked with the applicant in a positive and proactive manner consistent with the requirements of the NPPF. This included the following:-

- a) Provided pre-application advice to seek to resolve problems before the application was submitted and to foster the delivery of sustainable development.
- b) Provided feedback through the validation process including information on the website, to correct identified problems to ensure that the application was correct and could be registered;
- c) Have suggested/accepted/negotiated amendments to the scheme to resolve identified problems with the proposal and to seek to foster sustainable development.
- d) Have proactively communicated with the applicant through the process to advise progress, timescales or recommendation.

Appendices: