



NEXUS
PLANNING

Former Wyevale Garden Centre, Pield Heath Road, Uxbridge

Planning Statement

On behalf of The Structure Group and Locate Studios

June 2021

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1 Introduction

- 1.1 This Planning Statement has been prepared by Nexus Planning, on behalf of The Structure Group (“**TSG**”) and Locate Studios (“**the Applicant**”) in support of a full planning application for the following development:

*“Use of existing buildings for commercial filming (Class E) and erection of 5no. temporary workshops” (“**the Proposed Development**”)*

on land at the Former Wyevale Garden Centre, Pield Heath Road, Uxbridge (“**the Site**”)

- 1.2 The planning permission is sought for a temporary period of 12 months, and it is anticipated that this would be secured through the use of a suitable planning condition.
- 1.3 Locate Studios was born of the success of Locate Productions; a location servicing and stills production company established in 2005, which sources and manages locations for both stills and moving image shoots. Since 2010, it has acted as the managing agent of the 10-acre Gillette site – the former European brand headquarters in Brentford. These sites have been utilised as an ‘alternative’ build space for when purpose-built studios (such as Pinewood or WB Leavesden) have been at full capacity. The various old industrial and warehouse buildings have been used as spaces to construct and shoot sets for both feature films and high-end TV (HETV) projects. Local Studios has placed numerous notable tenants in these sites including; Paramount Pictures, FOX, CBS, NBC Universal, Sony, MGM and most recently, Amazon Studios.
- 1.4 TSG are specialists in temporary, demountable structures and flooring. For the 2012 Olympics, TSG built the 27,000 seater stadium at Greenwich for equestrian events and is currently making a conversion kit to change the London Stadium (West Ham United’s football ground) to allow for baseball use. In the film industry, TSG is the ‘go-to’ specialist when productions require temporary structures for filming or acoustic treatment of pre-existing buildings. They have helped build, convert and enhance such sites as Bray Studios, The Titan Building (now used by HBO) and RAF Cardington (a favourite build space for director Christopher Nolan).

Application Documentation

- 1.5 The planning application documentation submitted for approval comprises the following:
- Planning application forms and ownership certificates;

- Site location plan;
 - Proposed site plan;
 - Proposed floorplans and elevations;
- 1.6 The drawings should be read in conjunction with a range of technical documents and supporting material submitted with the planning application as follows:
- Design and Access Statement
 - Transport Statement;
 - Planning Statement;
 - Flood Risk Assessment and Drainage Strategy;
 - Geo Environmental letter; and
 - CIL Form.
- 1.7 The Planning Statement comprises the following sections and should be read together with the above accompanying technical reports, submitted drawings and application forms:
- **Section 2** provides details on the Site, its location and the surrounding area;
 - **Section 3** outlines the relevant planning history of the Site;
 - **Section 4** describes the Proposed Development;
 - **Section 5** outlines the planning policy context; and
 - **Section 6** assesses the Proposed Development against relevant planning policies.

2 Application Site Context

Application Site

- 2.1 The Site comprises the former Wyevale Garden, which has a rectilinear shape, measuring some 160m (east – west) by 96m (north – south), served by a vehicular access off Pield Heath Road and an entrance roadway connecting to the south east corner of the main Site area.
- 2.2 The Site contains a large single storey building along the southern part of the Site, and a number of smaller buildings/structures close to the western, northern and eastern boundaries.
- 2.3 The Site is completely covered in hardstanding, either as a surface car park (in the south eastern part of the Site) or for the storage / sale of garden centre goods (to the north and west of the main building).
- 2.4 The Site is located within the Metropolitan Green Belt, as is the land to the south (on the opposite side of Pield Heath Road), to the east, and to the north (including Brunel University London).
- 2.5 The Site is unconstrained by designated heritage assets, with the closest listed buildings (a church and former rectory) a distance of some 180m to the west, screened by woodland.
- 2.6 In accordance with the Environment Agency's flood map for planning, the Site is in zone 1 (land at least risk of flooding) save for its south west corner shown to be in zone 2.
- 2.7 The Site scores a Public Transport Accessibility Level (PTAL) of 2, placed between 0 (as worst) and 6b (as best).

Surrounding Area

- 2.8 Immediately to the south, west and north of the Site are areas of scrub and woodland, some of which are designated as a Site of Importance for Nature Conservation.
- 2.9 The surrounding vegetation greatly screens the Site from any wider visibility across the surrounding area.
- 2.10 To the east of the Site are a complex of buildings for Pield Heath House School and its associated convent of 'Sisters of the Sacred Hearts of Jesus & Mary'.
- 2.11 Beyond the woodland / scrub to the north is the large campus of Brunel University London.

- 2.12 There are two bus stops on Pield Heath Road adjacent to the south of the Site, served by routes U3 and U5 between Uxbridge, Hayes and Heathrow Airport. Other bus stops and routes are accessible to the Site.

3 Relevant Planning History

- 3.1 Planning application ref. 13831/APP/2020/2469 relating to the Site was approved on 03/12/20, allowing a five year extension of a temporary planning permission (ref. 13831/APP/2017/1217, dated 18/09/2018) to enable the temporary change of use of the Site from a garden centre to parking for Hillingdon Hospital staff. This temporary permission expires in December 2025.
- 3.2 Whilst in planning terms there remains provision to allow for car parking in connection with Hillingdon Hospital, the hospital no longer has a lease on the Site and therefore that facility is no longer available to it. Instead, Brunel University London (the owner of the Site) is in active discussions with the hospital, through the service agreement between the two organisations, to provide alternative parking across its estate in order to continue to help meet the hospital's parking needs.
- 3.3 Relevant too is that the current temporary planning permission for car parking does not affect the established and permanent use of the Site as a garden centre. That garden centre use could be reverted to immediately without the grant of any further planning permission.
- 3.4 The Applicant has a lease in place with Brunel University London for the use of the Site for commercial filming purposes, bringing much needed jobs to the Borough and addressing a significant unmet need for film and TV production facilities, as detailed elsewhere in this Planning Statement.

4 The Proposed Development

Overview

- 4.1 As detailed earlier, full planning permission is sought for the following:

“Use of existing buildings for commercial filming (Class E) and erection of 5no. temporary workshops”

Need for the Proposed Development

- 4.2 This planning application seeks to secure planning permission for the erection of five temporary buildings, for a period of 12 months, to accommodate the specific filming needs of a global production company who require the Site to support the production of a feature film at Pinewood Studios.
- 4.3 The proposals have been specifically designed to meet the requirements of the global production company and permission for the temporary buildings is sought for 12 months to encompass the anticipated length of time required for the filming to take place.

Supporting Background Information

- 4.4 The film and TV industry has been one of the fastest growing sectors of the UK economy for a number of years but the shortage of film studios is a major issue within the UK industry. The COVID-19 pandemic has only served to exacerbate the issue with an increased demand for content adding to the backlog of productions which were paused due to lockdown.
- 4.5 The Office for National Statistics (ONS) outlines that TV and film production has been one of the best performing sectors over the last year, growing at a notably faster rate than services as a whole.
- 4.6 PwC’s Global Entertainment & Media Outlook 2018-2022 states that in 2017, the UK had the fourth largest filmed entertainment market in the world after the USA, China and Japan, representing 5% of the global market.
- 4.7 The British Film Institute (BFI) outlines that the combined total spend on film and high-end TV production in the UK for 2019 was £3,616 million, a 16% increase from the £3,122 million spent in 2018 and the highest UK production spend figure ever reported¹.

¹ BFI Research and Statistics Unit - Film, HETV and animation programmers production in the UK 2019

- 4.8 The BFI confirms that the number of companies involved in the film industry increased by 36% between 2014 and 2018, compared to the UK all-industries average of 13%. It states that the majority of the growth is the result of an expansion in the number of companies working in the production sector, indeed the number of video production companies increased by 70%, while there was a 34% increase in the number of film production companies.
- 4.9 In February 2021, the Department for Digital, Culture, Media and Sports released data² showing that that in terms of gross value added (GVA) Creative Industries contributed £115.9bn in 2019, accounting for 5.9% of UK GVA. The GVA of Creative Industries has increased by 5.6% between 2018 and 2019 and by 43.6% between 2010 and 2019 in real terms. Furthermore, it details that Creative Industries GVA has been growing faster than the UK economy since 2011, with large increases in GVA in real terms seen in both 2015 and 2019.
- 4.10 The majority of the 102,000 people employed within the UK film and TV industry are concentrated within London and the South East. The BFI estimates 57% of the film industry employment is in this region. The high level of employment within the UK film and TV industry is attributed to the highly skilled specialist labour that can be found in the UK, particularly in the South East, hence the UK is one of few places outside the US where films can be crewed locally. London, in particular, is home to one of the greatest concentrations of film industry technical expertise in the world³.
- 4.11 In terms of current supply, the LSH Report also identifies that well over half of the UK's existing studio space is concentrated in Greater London and the South East. Further, a concentration of studios is located on the western fringes of London, including Pinewood, Leavesden and Shepperton, operated by Pinewood Shepperton and Warner Brothers.
- 4.12 CBRE report that several studios have expanded in line with the sector's recent growth including two of the biggest: Shepperton and Pinewood. However, since 2018 both are fully let to producers on 10-year leases – Netflix and Disney – diminishing supply. Many other studios report that they are near or at full practical occupation and therefore some producers have had to use temporary studio space in response to low supply. CBRE further reports that it is widely believed that the UK is losing out on business due to the lack of space. For example Pinewood Group estimates the UK lost out on £2.8bn of revenue between 2015-2017. This problem has been acknowledged by the UK government: its

² DCMS Economic Estimates 2019 (provisional): Gross Value Added (19th February 2021 update)

³ LSH, The UK Film & TV Studio Property Market 2018

stated aim of achieving £4bn per year of inwards investment by 2025 is explicitly contingent on the expansion of studio stock to create capacity.⁴

- 4.13 Overall, LSH report that that 1.6-1.9 million sq ft of new film studio space will be required over the next 15 years, if recent growth rates are sustained.³

Summary

- 4.14 Having regard to all of the above, it is demonstrate that there is substantial unmet need for film and TV production facilities. Furthermore, there is a well acknowledged shortage of space at studios local to the Site, in particular at Pinewood.
- 4.15 Given the proximity of the former Wyevale Garden Centre site to operational film studios, it presents an exceptional and logical opportunity to provide additional workshop space for set-builds to support productions in the local area.
- 4.16 This particular application will support the production of a new feature film by an Academy Award winning Director.
- 4.17 If these production facilities cannot be accommodated on the Site, this particular opportunity and as its associated economic benefits, would be lost to the Borough.

Economic Benefits

- 4.18 The Proposed Development has the potential to create average employment of approximately 100 direct jobs on-Site which can be realised almost immediately.
- 4.19 The scheme will also generate substantial supply chain benefits and indirect jobs through an extensive range of skills and expertise required to support film and TV production. This will range from the patronage of local shops, hotels and restaurants to the demand for specialist services such as costume designers, make-up artists and set creators. Research by the British Film Institute has shown that for every job created in the core UK film industry, a further job is supported through indirect and induced multiplier impacts taking the total jobs supported to approximately 200 – a significant boost for the economy at a time when it is most needed⁵.

⁴ CBRE, Setting the Stage – UK TV & Film 2021

⁵ BFI, The Economic Impact of the UK Film Industry, 2012

- 4.20 Letters of support from the British Film Commission, Film London and West London Business can be found at Appendix A.

Key Elements of the Proposed Development

- 4.21 The Proposed Development, for which planning permission is sought, is the construction of 5no. temporary workshops in connection with film production.
- 4.22 As the existing buildings and Site itself (as a garden centre) have a Class E (commercial, business & service) use, they can be used for film production purposes without the need for planning permission (as that also falls within Class E).
- 4.23 Following the expiration of the sought planning permission for the Proposed Development, and the current temporary planning permission (13831/APP/2020/2469) for hospital car parking on the Site, the Site would return to its current condition as a lawfully established garden centre.

Layout

- 4.24 The proposed layout retains that of the existing buildings across the Site, save for the provision of five temporary workshop buildings along the northern building to supplement the use of the existing floorspace and Site.

Appearance, Height and Massing

- 4.25 Each of the buildings proposed temporary buildings would be single storey. Workshop 1 would have an eaves height of 6.2m and a ridge of 8.2m, whilst the other workshops would be lower (eaves height of 4.2m and ridge of 6.2m).

Construction and Assembly

- 4.26 The temporary structures consist of demountable soft side buildings, stretched over aluminium structural frames. The buildings will be placed directly on the ground and require no foundations or ground disruption.

Access and Parking

- 4.27 The existing access into the Site from Pield Heath Road will be retained, as will the current parking area.

5 Development Plan Context

- 5.1 This section of the Planning Statement summarises the planning policy context relevant to the Proposed Development. Subsequently, Section 6 provides a more detailed assessment having regard to the relevant planning policies and the technical work submitted as part of this planning application.
- 5.2 For this planning application the development plan comprises:
- Local Plan: Part 1 (adopted November 2012) ("**the Local Plan**");
 - Local Plan Part 2: Development Management Policies (adopted January 2020);
 - Local Plan Part 2: Site Allocations and Designation (adopted January 2020); and
 - London Plan (published March 2021)
- 5.3 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires all planning applications to be determined in accordance with the development plan unless there are material considerations which indicate otherwise. One such material consideration is the National Planning Policy Framework ("NPPF"). Paragraph 11 of the NPPF, the presumption in favour of sustainable development, asks decision-makers to approve development proposals that accord with the development plan without delay.

Other Material Considerations

National Planning Policy Framework (NPPF) (February 2019)

- 5.4 In 2019, the Government republished an updated NPPF, which sets out the Government's planning policies for England. Paragraph 11 outlines that at the heart of the NPPF lays a "presumption in favour of sustainable development".
- 5.5 Paragraph 8 of the NPPF identifies that there are three sustainable development objectives that the planning system must aim to achieve:
- **An economic objective** – to help build a strong, responsive and competitive economy;
 - **A social objective** – to support strong, vibrant and healthy communities; and
 - **An environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment.

National Planning Practice Guidance (PPG)

- 5.6 The PPG is a live document, which is actively managed by Government as necessary to ensure that it remains up to date.
- 5.7 The PPG is divided into different topic areas which provide advice and guidance to inform the understanding and approach to implementation of the NPPF. This will be referred to throughout this Planning Statement where necessary.

Supplementary Planning Documents / Guidance

- 5.8 The Council has published a Planning Obligations SPD that explains how contributions sought under s.106 of the Town and Country Planning Act 1990 (as amended) function alongside the Community Infrastructure Levy.

6 Assessment of the Proposed Development

6.1 The planning considerations relevant to the Proposed Development are as follows:

- the principle of development;
 - temporary development;
 - development in the Green Belt;
- maximising the use of previously developed land;
- impact on the openness of the Green Belt;
- impact on the purposes of including land within the Green Belt;
- consideration of alternative sites;
- economic impacts;
- promoting sustainable transport;
- achieving well-designed places;
- meeting the challenges of climate change, flooding and coastal change; and
- very special circumstances.

6.2 These subject headings are addressed in turn below with reference to the Proposed Development and the relevant planning policies.

Principle of Development

Temporary Planning Permissions

6.3 Section 72(1(b)) of the Town and Country Planning Act 1990 provides local planning authorities the power to grant planning permission for a specified period of time through the use of planning conditions.

Development in the Green Belt

6.4 The Local Plan identifies a very significant proportion of the Borough to be within the Green Belt (some 4,970 ha), which seeks to maintain the openness of that land and is a significant constraint to development. This poses great challenges in how the Council is able to meet its need for

development, including for growing sectors of the economy. Under Local Plan Policy EM2, proposals for development in the Green Belt will be assessed against national and London Plan policies, including where ‘very special circumstances’ (VSC) to justify inappropriate development in the Green Belt may exist.

- 6.5 Paragraph 143 of the NPPF states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 144 then explains that substantial weight should be given to any harm to the Green Belt and that VSC will not exist unless the potential harm to the Green Belt by reason of the inappropriateness, and any other harm arising from the proposal, is clearly outweighed by other considerations.
- 6.6 Paragraph 145 of the NPPF sets out 7 exceptions whereby the construction of new buildings in the Green Belt is not inappropriate, whilst paragraph 146 identifies certain other forms of development that are also not inappropriate in the Green Belt, subject to criteria.
- 6.7 The Proposed Development does not benefit from any of the exceptions listed at NPPF paragraphs 145 and 146 and, as a result, it is considered to be inappropriate development in the Green Belt. Accordingly it is necessary to demonstrate that VSC exist in order for the development to be acceptable.
- 6.8 In coming to a view as to whether VSC exist to justify inappropriate development in the Green Belt, it is important to consider the case law in this regard; in particular the R (Khan) v LB Sutton [2014] EWHC 3663 (Admin), Patterson J High Court Judgement (see Appendix 1), which details at paragraph 80 that:

“...whether a factor constitutes very special circumstances is a matter for the decision maker in the exercise of his judgement in any particular case.”
- 6.9 It is therefore clear that a decision as to what can constitute VSC is ultimately a matter for the decision maker. Furthermore, the weight that is given to various components of a VSC case, individually or cumulatively, is again a matter of planning judgement.
- 6.10 A comprehensive list of the grounds that contribute towards forming VSC to justify inappropriate development in the Green Belt is set out at the end of this section of the Planning Statement.

Maximising the use of Previously Developed Land

- 6.11 The Site, as maintaining its existing use as a garden centre, is previously developed land (PDL), in accordance with the definition of the NPPF. This is confirmed by the officer report for application ref. 13831/APP/2020/2469, where in its summary section it considers that:

"The site has established use as a garden centre. It is considered that the site can be considered as brownfield land for the purposes of NPPF paragraph 145g."

- 6.12 Paragraph 117 of the NPPF states that strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land, whilst paragraph 118 outlines that planning decisions should support the development of under-utilised land and buildings.
- 6.13 Paragraph 147g of the NPPF also outlines support for the redevelopment of PDL within the Green Belt, where that redevelopment does not have a greater impact on the openness of the Green Belt.
- 6.14 Given the Site is heavily developed, wholly covered in hardstanding and containing a large building with a garden centre use and other ancillary buildings / structures, its ongoing use as PDL, especially where that is meeting an identified need (for film production facilities in this instance) is encouraged by the NPPF.

Impact on the Openness of the Green Belt

- 6.15 The NPPF does not specifically define 'openness' in a Green Belt context, and it had previously been left to case law to provide an indication on what this means in practice. This gap in policy has however been rectified by an update to the PPG in July 2019 where a new guidance note titled 'Green Belt' was introduced. This includes a non-exhaustive list of matters that should be taken into account in assessing Green Belt openness, which are as follows:

- *"openness is capable of having both spatial and visual aspects - in other words, the visual impact of the proposal may be relevant, as could its volume;*
- *the duration of the development and its remediability - taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and*
- *the degree of activity likely to be generated, such as traffic generation."*

(Paragraph ref ID. 64-001-20190722)

6.16 These are considered in turn below.

Spatial and visual aspects

- 6.17 When considering spatial and visual aspects it is important to consider the appearance of the existing Site, which is set out in detail in Section 2 of this Statement. These existing factors mean that the Site as a whole does not currently make an important contribution to the openness of the Green Belt as it would not be considered particularly 'open' in its character.
- 6.18 In terms of physical development, the proposals include the provision of a 5no. temporary buildings. The scale of these buildings is set out within Section 4 of this Statement.
- 6.19 It is recognised that the Proposed Development will result in a limited increase in floorspace and volume of built form, however, having regard to the contained nature of the Site and modest height of the buildings, long distance views from the wider Green Belt do not arise and the buildings would not be readily perceptible from Pield Heath Road, for example.
- 6.20 The new buildings would not give a sense of built form spreading given the fact they will be located on an already urbanised area and read immediately within the context of the existing buildings. This moderates the visual impact of the Proposed Development as well.
- 6.21 Overall, the Proposed Development will result in harm to Green Belt openness in spatial and visual terms, through the necessary requirement to accommodate a number of temporary buildings and consequential increase in floorspace and volume of development on the Site. However, this must be considered against the temporary nature of the Proposed Development (addressed further below), the fact that the Application Site as a whole does not currently make a strong contribution towards the openness of the Green Belt and that new development has been wholly sited on PDL.

Duration of development and its remediability

- 6.22 As outlined earlier, the PPG is now clear that it is material to consider the duration of the development and its remediability (for example returning land to its original state) when assessing impacts upon Green Belt openness. Accordingly, it is particularly pertinent in this case to note that the planning permission is only sought for a temporary period – 12 months.
- 6.23 Following the expiry of any temporary planning permission given, any impact on Green Belt openness associated with the proposals will cease as the buildings and structures associated with the Proposed Development would be removed and the land returned to its former condition.

6.24 Furthermore, it should also be noted that in considering the merits of an appeal to provide temporary structures and hardstanding associated with filming at Wisley Airfield in Guildford Borough, the appointed Inspector concluded that the temporary nature of the development (1 year in this case) meant that the “*considerable loss of openness*” to the Green Belt as a result of the development only carried moderate weight against the scheme (planning appeal ref. APP/Y3615/W/15/3133032 - decision dated 25th January 2016 (Appendix B)). This is an approach which equally applies to the Proposed Development.

Degree of activity likely to be generated

6.25 Turning to the final consideration specifically identified by the PPG, it is necessary to consider the degree of activity likely to be generated, such as traffic generation.

6.26 By virtue of the Site’s extant use as a garden centre and temporary planning permission for use as hospital parking, a significant number of vehicular movements and high levels of activity have and are approved to continue to operate on the Site.

6.27 A Transport Statement has been prepared in support of the Proposed Development and as outlined later on in this Statement, it shows that there would be significantly less traffic generation (compared to the baseline of the existing Site), and therefore less activity across the wider area, as a result of the Proposed Development.

Summary

6.28 Given the above, it is concluded that the Site exhibits a number of factors that significantly limit its overall contribution to the openness of the Green Belt and the impact the Proposed Development would have upon openness. Furthermore, any impacts that do arise to openness as a result of the Proposed Development must be considered in the context of effects only arising for a temporary period of 12 months. Accordingly, and in line with appeal decisions, no more than moderate weight should be given to the impacts upon openness.

Impacts on the purposes of including land within the Green Belt

6.29 The five purposes of including land in the Green Belt are identified at paragraph 134 of the NPPF. These are as follows:

- 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.

6.30 In considering the impact of the Proposed Development on the Green Belt, it is helpful to consider how it would affect the role of the Site in fulfilling these purposes, which are addressed in turn below.

Purpose a)

6.31 The Site is not located on the outer edge of the built-up area, instead characterised as an island that is already surrounded by built form. The Site therefore does not serve to restrict urban sprawl of London, with the envelope of the metropolitan area remaining unaltered. Accordingly, the Proposed Development will not impact upon the role of the Site in this regard.

Purpose b)

6.32 Beyond the immediate screening woodland / scrub, the Site is surrounded by the built form of Hillingdon, including suburban residential areas, Brunel University London and Hillingdon Hospital. This built development is not a distinct town or settlement in its own right, rather simply part of the wider urban area. Given this characteristic, the Proposed Development will not result in the merging any two neighbouring towns, as well as the fact that the proposed built form will not extend beyond the existing PDL of the Site.

Purpose c)

6.33 As detailed earlier, the whole Site comprises PDL. It does not therefore perform a strong role in protecting the openness of the countryside, nor is the Site 'open' at all in its character. In light of this, the Proposed Development would not result in any material encroachment into the countryside, particularly given the temporary nature of the proposals.

Purpose d)

6.34 The Site is not located adjacent to a historic town. The nearest designated heritage assets (the Church of St Lawrence and its former rectory) are at a sufficient distance and wholly screened by substantial vegetation for the Site to not fall within their setting. It therefore does not contribute towards this purpose and, accordingly, the Proposed Development will not have an impact in this respect.

Purpose e)

- 6.35 Whilst the intention of this purpose is to promote the reuse of derelict and other urban land outside of the Green Belt, it is relevant that the Site itself is disused PDL, following the closure of the garden centre. Whilst any inappropriate development on the Site would technically be contrary this purpose, the Proposed Development would still deliver the short term improvement and effective reuse of the Site, with significant regeneration benefits as set out elsewhere in this Statement – thus it is considered that the Proposed Development complies with the spirit of this Green Belt purpose.

Summary

- 6.36 Given the above, it is clear that the Site in its existing form does not make a significant contribution to the purposes of including land within the Green Belt. Furthermore, the Proposed Development would not meaningfully affect any contribution the Site makes in this regard, and even if it were concluded to do so, any such impacts would only be temporary and would be justified by the substantial economic benefits of the proposal.

Building a Strong and Competitive Economy

- 6.37 Local Plan Policy SO15 seeks to protect land for employment uses, with the aim to be able to meet the needs of different sectors of the economy. The London Plan (March 2021) emphasises the importance of enhancing London’s global economic competitiveness (Policy GG5), as the engine of the UK economy that includes its creative industries.
- 6.38 Paragraph 7 of the NPPF is clear that the ‘economic objective’ is a critical component of achieving sustainable development. This means helping to *“build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth...”* (emphasis added).
- 6.39 Paragraph 80 of the NPPF states that planning decisions should help create conditions where businesses can invest, with *“significant”* weight placed on the need to support economic growth. Further, paragraph 82 identifies that planning decisions should recognise the specific locational requirements of different sectors.

Economic Benefits

- 6.40 The economic benefits of the Proposed Development are set out within Section 4 of this Planning Statement.

- 6.41 In summary, the film and TV industry has been one of the fastest growing sectors of the UK economy for a number of years but the shortage of film studios is a major issue within the UK industry. The COVID-19 pandemic has only served to exacerbate the issue with an increased demand for content adding to the backlog of productions which were paused due to lockdown.
- 6.42 The Proposed Development has the potential to create average employment of approximately 100 direct jobs on-site which can be realised almost immediately.
- 6.43 The scheme will also generate substantial supply chain benefits and indirect jobs through an extensive range of skills and expertise required to support film and TV production. This will range from the patronage of local shops, hotels and restaurants to the demand for specialist services such as costume designers, make-up artists and set creators. Research by the British Film Institute has shown that for every job created in the core UK film industry, a further job is supported through indirect and induced multiplier impacts taking the total jobs supported to approximately 200 – a significant boost for the economy at a time when it is most needed⁶.
- 6.44 Furthermore, as Brunel University London is the freeholder of the Site, it should be noted that the Applicant is exploring the opportunity for production companies to offer work experience or placements to students completing courses associated with the creative industries. The Applicant would also like to offer guest lecturers from the industry to speak to students about their experiences and entry into this sector. This would help support the next generation of skilled personnel in the film industry for which the UK is already so well regarded.
- 6.45 Overall, the creation of so many highly skilled jobs represents a substantial benefit of the Proposed Development which aligns with both local and national planning policy and should be afforded substantial weight.

Transport Impacts

- 6.46 Local Plan Policy T1 seeks to steer development to the most appropriate location in order to reduce its impact on the transport network. Against either the lawful garden centre function of the Site or its temporary use for hospital car parking, the Transport Statement identifies that Proposed Development would result in fewer trips on the highway network.

⁶ BFI, The Economic Impact of the UK Film Industry, 2012

- 6.47 Policy T1 also encourages access by sustainable modes of travel, including public transport, walking and cycling, consistent with NPPF paragraph 102 and 103. In this regard, the Site is served by two adjacent bus stops on Pield Heath Road for routes U3 and U5 between Uxbridge, Hayes and Heathrow Airport; Pield Heath Road has a footway along its northern side; and there is a cycleway / footpath through the open space to the south that provides a direct link to the Site from Yiewsley.
- 6.48 Thus is considered the Site is in a suitably accessible location that offers opportunities for travel other than by the private car.
- 6.49 The Transport Statement that accompanies the application details that 108 car parking spaces will be retained on the Site, which is sufficient in accordance with the range of between 67 and 132 spaces presented by the Council's parking standards for the Proposed Development (considered in this respect to be akin to a B2/B8 type use).
- 6.50 Appropriate cycle parking on the Site can be secured by condition.

Design Considerations

- 6.51 Good design is a key aspect of sustainable development – that development should be visually attractive and sympathetic to local character, while being able to innovate and respond to change (paragraphs 124 & 127 of the NPPF) and make optimal use of land (paragraph 123).
- 6.52 Policy BE1 of the Local Plan adds that the Council will require all new development to improve and maintain the quality of the built environment through the design of buildings and surrounding landscape.
- 6.53 As only required for a period of 12 months, the design of the workshop buildings reflect that temporariness – that they have a functional appearance, led by their construction method and intended use. This allows the buildings to be constructed quickly and removed and reused elsewhere following the 12 month period.
- 6.54 It is also relevant that the buildings will not be widely visible from the surrounding area, with views into and out of the Site contained by the adjacent woodland / scrub.
- 6.55 Given the temporariness of the buildings, including the construction techniques used, it would be inappropriate to consider them against any BREEAM standards in the same way as a building with a 60 to 100 year lifetime.

Impacts on Flooding and Drainage

- 6.56 The five temporary buildings of the Proposed Development would be located within flood zone 1, and would not increase the risk of flooding on the Site or elsewhere.
- 6.57 Whilst the south west corner of the Site is shown to be within flood zone 2, there would be no change to this area by the Proposed Development.
- 6.58 Safe access to and from the Site would remain via the entrance driveway connecting to the south east corner.
- 6.59 Given the whole Site is currently covered by hardstanding, there would be no change to surface water drainage of the surrounding area as a result of the Proposed Development.

Very Special Circumstances

- 6.60 The NPPF is clear that substantial weight should be given to the harm to the Green Belt through inappropriateness. Paragraph 144 of the NPPF also requires the consideration of 'any other harm' either to the Green Belt or other areas as a result of the development.
- 6.61 In respect of further impacts upon the Green Belt, the Proposed Development would result in a greater impact upon the openness of the Green Belt than the existing Site. However, having regard to case law in respect of temporary impacts upon the Green Belt, it is considered only moderate weight should be afforded to the identified harm.
- 6.62 No meaningful impacts upon the Site's contribution to the purposes of including land within the Green Belt are considered to arise.
- 6.63 Overall, the Proposed Development brings a significant number of benefits, as set out below, which collectively are considered to represent VSC:
- facilitating the investment of major film production company in the Borough;
 - the creation of 100 direct jobs on Site and supporting a further 100 jobs in the supply chain;
 - enhancing the vitality of local services including hotels, restaurants, convenience stores and taxi companies;
 - the creation of educational opportunities to support the next generation of skilled personnel;
 - promoting the effective use of PDL; and

- returning the Site to its former condition following the expiry of any planning permission given.

6.64 Given the above, it is demonstrated that the substantial benefits derived from the Proposed Development would clearly outweigh any harm to the Green Belt. Accordingly, VSC exists and the Proposed Development should be approved.

Appendix A



British Film Commission

The Arts Building

Morris Place

London

N4 3JG

Tel +44 (0)20 7613 7675

www.britishfilmcommission.org.uk

www.filmlondon.org.uk

London Borough of Hillingdon
Civic Centre
High Street
Uxbridge
Middlesex
UB8 1UW

May 2021

To whom it may concern

REF: Stage Space Support & Development: Former Wyevale Garden Centre, Pield Heath Road

The British Film Commission (BFC) is the UK Government's national organisation responsible for supporting inward investment film and TV production in the UK, funded by the Department for Digital, Culture, Media and Sport (DCMS) through the BFI and by the Department for International Trade (DIT), with corporate sponsorship from key film and TV clients including HBO, Netflix, Walt Disney Studios, and Warner Bros. The BFC leads on:

- Maximising and supporting the production of major international feature film and high-end television in the UK;
- Strengthening and promoting the UK's film and television infrastructure;
- Liaising between the Government and the film and television industry on legislative issues that impact on production.

We were excited to learn about this potential new studio development opportunity in Greater London. Redevelopment opportunities such as this in key film and TV production hubs are unfortunately rare so the BFC is keen to support this initiative. Studios in Greater London and the south east of England have hosted some of the highest-profile and most commercially successful film and TV productions of all time. An example of a recent success based locally is Shondaland's *Bridgerton*, Netflix's most successful series ever which has since been recommissioned for a further two seasons. The region benefits from the UK's largest crew base, leading creative talent, iconic locations and cutting-edge production, post-production and visual effects facilities, all of which contribute to the area's reputation as one of the best places in the world to produce high-end content.

UK Government recognises that film and TV studios are a unique economic and cultural proposition, highlighting "the impact that creative anchor institutes can have on pride and economic performance in an area", and citing film and TV studios as an example of how creative businesses and local investment increase employment and share spill-over benefits across the area and the supply chain.

This Government backing was consolidated in the Spring 2020 budget when the Chancellor of the Exchequer announced support to increase stage studio space capacity in the UK: *The Budget allocates £4.8 million to*

expand the work of the British Film Commission to promote the UK as a destination of choice for studio space investment. The British Film Commission will act as a single source of expert advice for investors and developers and provide targeted support at the early stages of viable projects to facilitate increased provision of studio facilities across the UK.

Due to the growing demand for filmed content, the UK film and TV industry has become increasingly valuable in terms of employment and investment. Inward Investment film production spend in the UK increased by 30.6% over the five years to financial year 2019/20; with inward investment High-End TV spend increasing by 265.5% in the same time-frame. Furthermore, despite a global suspension of production due to COVID-19, inward investment spend from major international productions still reached £2.34 billion in 2020, with £1.19bn spend in the final quarter, the second highest spend ever over a 3-month period.

Film, TV and the wider Creative Industries have grown at five times the rate of the UK economy as a whole. Their contribution to GVA has outstripped that of the automotive, aerospace, life sciences and oil and gas industries combined.

The success of the UK as a production destination has led to extreme stage space capacity issues. To meet the continuing demand for content, the requirement for additional stage space of the right scale and in the right geographical locations with access to the UK's world-class skills and infrastructure, has never been higher.

The British Film Commission is fully supportive of Locate Studios and TSG proposal to create additional capacity through development of the former Wyevale Garden Centre.

If the BFC can provide any further support or evidence of the importance of additional stage space and studio capacity, please do not hesitate to contact us.

Yours faithfully,



Samantha Perahia MBE
Head of Production UK
British Film Commission



Planning
London Borough of Hillingdon
Civic Centre
High Street
Uxbridge
Middlesex
UB8 1UW

29th April 2021

To whom it may concern,

Re Studio Development Proposal, former Wyevale Garden Centre, Pield Heath Road

I write to you in my capacity as Head of Production Services of Film London. Film London is the capital's screen industries agency, funded by the Mayor of London, the National Lottery through the BFI, with support from Arts Council England and Heritage Lottery Fund.

Inward investment from the production of international feature film and high-end TV (HETV) drama reached record levels in the UK in 2019. London attracts over 75% of the film and TV industries UK spend and international feature films alone spent £1.3bn in the London region in 2019. The screen industries support thousands of jobs and have wider benefits for our city, boosting tourism and raising our international profile. Despite the COVID19 pandemic halting all production in March 2020, our ability to be one of the first industries to re-start in the summer led to only 21% reduction on combined total spend in the UK (at £2.84bn) compared with the previous year. As you're no doubt aware 2021 is already exceedingly busy as the industry makes up for lost time. We fully expect that film and TV production will play a key role in the economic recovery of the capital over the coming years.

With this success come challenges: London's increased popularity as a filming destination has led to severe capacity issues, most notably for studio space. By nature, our film and HETV tax reliefs encourage productions to maximise their UK-based activity, and are best suited to major high-end projects. These typically require multiple large-scale sets spread over stage space totalling an average of anywhere between 40,000 and 120,000sqft, plus associated workshop, office, back lot, and other auxiliary space. The finite amount of purpose-built, or re-purposed, studio space in the UK has led to the loss of several major multi-million dollar feature film and TV projects to competitor territories, with the resultant loss of investment, employment, and tax revenue for UK plc and the London economy. Even in an industry that utilises alternative stage space resourcefully, the loss of projects and resultant loss of investment is considerable. As Lucasfilm and Disney's long-term residence continues, newer major players such as Netflix,

Amazon, Apple and Hulu continue to enlarge the marketplace, a film-friendly government, and a relatively attractive £:\$ exchange rate, the proliferation of major film and HETV projects, the resultant capacity issue, is set to continue – if not, more likely, to increase.

In recognition of the importance of the creative industries, which are worth £92 billion, employ two million people, and are growing twice as fast as the rest of the economy, the UK Government sustains Creative Sector Tax Reliefs to attract further business and ensure the UK retains its position at the forefront of global production.

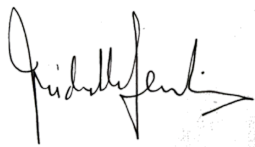
Inward tourism spend is also strongly associated with the production of film and HETV. Tourism, as a result of British film, is estimated to have brought 8,400 FTEs and £400m GVA, while more than £200m of inward tourism spend is associated with HETV.

Due to the large and experienced crew base, diverse and cinematic filming locations, easy access to the world's leading VFX and post-production hub in Soho, and film-friendly local government, London and South East England are probably the busiest areas for high-end production in the world. As you know, West London sits at the heart of this and is home to numerous businesses in the production industry supply chain. As such, studio/stage space capacity and ancillary workshop space is a key priority for the area. Additional stage capacity would not only allow London and South East England to build their already established and impressive reputation amongst international clients, and increase the level and diversity of stage space in the UK, but would also provide a considerable and essential boost to the combined efforts of Film London, and our public and commercial partners, to market London globally as a leading destination for major HETV and feature film production.

Film London wholeheartedly supports Locate Studios and TSG's proposal to convert the old Wyevale Garden Centre site on Pield Heath Road for film and TV production purposes. The proposal to first use the site for workshops and prop storage is an excellent way to test the workability of the site and provide much needed support space to productions filming in West London.

If Film London can provide any further support or evidence of the necessity for a significant increase in stage and auxiliary space capacity in London, please do not hesitate to contact us.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Michelle Jenkins', with a stylized flourish at the end.

Michelle Jenkins
Head of Production Services
Film London

Copy to : Adrian Wootton OBE, Chief Executive, Film London



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T: 020 8607 2500

E: info@westlondon.com

Twitter: [@westlbusiness](https://twitter.com/westlbusiness)

London Borough of Hillingdon
Civic Centre
High Street
Uxbridge
Middlesex
UB8 1UW

27 April 2021

To whom it may concern,

Re. Film Studio Facility on Pield Heath Road

West London Business (WLB) is the voice of the sub-region's business-community, with a membership including large firms such as Heathrow and Asahi, as well as SMEs Fullers, JCP Law, Kingston Smith LLP, micro enterprises and education institutions such as Brunel University. Established in 1994, our mission is to ensure that West London remains the best place to do business. West London is an amazing sub-region: a pre-COVID £73bn economy and the UK's global gateway. Our members work together through WLB to raise West London's global economic competitiveness, whilst pursuing social and environmental sustainability.

This letter is to confirm West London Business support for the proposed film facility on Pield Heath Road at Brunel University.

West London is already home to a vibrant film and TV industry – an exciting economic and creative cluster that already has a competitive advantage: superior connectivity (Heathrow), major studio base (e.g. Ealing, Osterley, Elstree, Pinewood and Shepperton), international players (e.g. Sky, Disney, Discovery, Paramount, UKTV, QVC) and a flourishing supply chain of smaller businesses.

A new film studio at Brunel University will strengthen West London's and the UK's position in the global marketplace for film and tv. It will also bring new investment to West London as well as the investment and creation of jobs. Equally important, West London Business is very encouraged by the facility's commitment to engage and work with the programmes and facilities Brunel University already offers as part of its TV/Film work.

www.westlondon.com

West London Business Ltd
Company limited by guarantee, registered in England number: 02934029
VAT registration number: 674069512

Please do not hesitate to contact us directly if we can expand on any of the points above.

Yours sincerely,



Bill Boler

Director, Creative Enterprise West
West London Business
c/o MKS LLP
The Shipping Building
The Old Vinyl Factory
Blyth Road
Hayes UB3 1HA

T: 020 8607 2500

W: www.westlondon.com

www.westlondon.com

West London Business Ltd
Company limited by guarantee, registered in England number: 02934029
VAT registration number: 674069512

Appendix B

Appeal Decision

Site visit made on 16 November 2015

by Jonathan Manning BSc (Hons) MA MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

Decision date: 25 January 2016

Appeal Ref: APP/Y3615/W/15/3133032

Land at Wisley Airfield, Hatch Lane, Ockham, Surrey, GU23 6NU

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Wisley Property Investments Ltd against the decision of Guildford Borough Council.
 - The application Ref 14/P/01664, dated 5 September 2014, was refused by notice dated 23 February 2015.
 - The development proposed is temporary use of land for filming, incorporating associated temporary structures and use of the site and hardstanding for parking and storage, with associated access.
-

Decision

1. The appeal is dismissed.

Main Issues

2. The appeal site is located within the Green Belt and from the evidence before me, I consider the main issues of the appeal are:
 - Whether the proposal would be inappropriate development in the Green Belt;
 - The effect of the proposal on the openness of the Green Belt;
 - The effect of the proposal on the living conditions of the occupants of neighbouring properties, in terms of noise and disturbance and light pollution;
 - The effect of the proposal on ecological features;
 - The effect of the proposal on highway safety; and
 - Whether the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations, so as to amount to the very special circumstances (VSC) necessary to justify it.

Reasons

Whether the proposals would be inappropriate development?

3. The National Planning Policy Framework (the Framework) at Paragraph 89 sets out that the construction of new structures in the Green Belt should be considered as inappropriate. There are a number of exceptions to this,

however, a material change of use is not included. Consequently, the proposal represents inappropriate development and conflicts with Section 9 of the Framework in this regard.

4. The proposal would be for a temporary 12 month period of time and the site would be returned to its current state after this time. There would also not be any permanent conflict with any of the purposes of including land within the Green Belt, as identified in Paragraph 80 of the Framework. I consider that this limits the harm arising from the proposal as a result of the inappropriate nature of the development and its conflict with the Framework. Although, I am mindful that 12 months is not an insignificant period of time and therefore, I attach a moderate level of harm against the scheme due to its inappropriate nature.

Openness

5. Openness is an essential characteristic of the Green Belt. The appeal site is currently an open disused airfield. The proposal would result in the construction of filming sets, welfare facilities and a considerable parking area that could accommodate up to 120 cars and 17 Heavy Goods Vehicles (HGVs). As set out above, this would be for a temporary 12 month period and the site would be returned to its current state. I consider that there would be a considerable level of harm to the openness of the Green Belt for the temporary 12 month period and this would be in addition to the harm arising from the inappropriate nature of the proposal. I consider that given the temporary nature of the proposal that this carries a moderate level of weight against the proposal.

Living conditions

6. Wisley Airfield covers a large area, although the proposed filming activities would be restricted to a 'filming hub' within the northwest part of the wider site. The 'filming hub' would be located approximately 85 to 130 metres from the nearest residential properties and their curtilages at Elm Corner to the northeast. Whilst this is a reasonable distance, I have not been provided with any substantive details of potential activities that would take place on the site. The appellant has also confirmed that at this point in time there is no confirmed user of the proposal. As a result, I agree with the Council that without details of the types of production, equipment, sets and any special effects that would be used, it is not possible to conclude that there would not be any harm caused to the living conditions of the occupants of neighbouring properties.
7. I accept that the activities are proposed to take place between 07.00 to 18.00 Monday to Friday and 08.00 to 17.30 on Saturdays. Whilst this would go some way to minimising potential impacts, in the absence of any details on activities, I consider that it cannot be ruled out that even during such time constraints that unacceptably noisy and unneighbourly activities would take place. The appellant has confirmed that they are content for a condition to be imposed that restricts the use of pyrotechnics. However, I consider that this in itself, is not sufficient to address my concerns.
8. I acknowledge the advice provided by the Council on a previous planning application (Council Ref: 13/P/02165), which was refused. However, this does not affect my findings above. Further, it is evident that in that case, the

Council also advised that information on the types of activities being carried out would be required. The appellant has set out that the site was recently used as a park and ride for an Army Service Day. I am mindful that such an activity is very different from the proposed filming use in this case. Therefore, I am not of the view that this sets a precedent for the use of the site for filming purposes.

9. The Council has also raised concern with regard to the effect of light pollution on the living conditions of the occupants of neighbouring properties. I acknowledge that external lighting is likely to be required particularly in the winter months. However, I agree with the appellant that such matters can be suitably controlled by the imposition of a planning condition that would require a lighting scheme to reduce any potential harm to an acceptable level, to be agreed with the Council. Although, this does not overcome my above concerns.
10. In conclusion, in the absence of any substantive details of potential activities on the site and potential noise impacts, I consider that it cannot be concluded that there would be no harm to the living conditions of the occupants of neighbouring properties, in terms of noise and disturbance. Consequently, the proposal conflicts with Policy G1(3) of the Guildford Borough Local Plan (2003) (the LP). The policy seeks to ensure that the amenities enjoyed by occupants of buildings are protected from unneighbourly development.

Ecology

11. The site itself is not designated as a statutory nature conservation site. However, it lies immediately to the south of the Ockham and Wisley Commons Site of Special Scientific Interest (SSSI), which forms part of the Thames Basin Heaths Special Protection Area (SPA). Further, the western end of the site is designated as a non-statutory Site of Nature Conservation Importance (SNCI).
12. A revised ecological report has been submitted with the appellant's appeal evidence. This determines that with the implementation of a number of recommendations that significant impacts on ecological features would be avoided. However, as set out above, I have very limited details on the potential activities that would take place on the appeal site and the ecological assessment also includes limited details in this regard. Despite the fact that Natural England and the Surrey Wildlife Trust did not raise any objection to the planning application, I cannot to any certain degree, be sure that the proposed recommendations in the revised ecological report are sufficient to mitigate any potential harm to ecological features and protected species.
13. Given this and the sensitive nature of the appeal site, it must be concluded that the scheme has the potential to cause harm to ecological features and protected species. The proposal therefore runs contrary to Policies NE1, NE2, NE3 and NE4 of the LP and the Framework.

Highway safety

14. The proposed access to the site would be from Ockham Lane. Vehicles would then access the proposed 'filming hub' and parking area via an internal route along the former runway and taxiways. It is set out that the proposed parking area would include space for 120 cars and 17 HGVs. These vehicles would access Ockham Lane from the A3 via Old Lane.

15. The application is supported by a Transport Statement that provides estimates of the likely trips generated by the proposal. This sets out that the busiest period would be during the filming with approximately 200-240 car and minibus movements anticipated outside of peak hours. Further, it is identified that the largest number of HGV movements is expected to take place before and after the filming phase and would not coincide with the largest number of movements during the filming phase. A Travel Plan is also proposed and could be secured by a planning condition. This would set out measures to encourage the use of modes of transport other than the use of a private car, including using minibuses to transport staff.
16. I observed that Old Lane is subject to a 7.5 tonne weight limit, however, I understand that this does not apply for access purposes. Given the above and my observations on the site visit, I consider that the scheme would not cause any harm to highway safety. I am also mindful that the County Highway Authority, subject to the imposition of planning conditions share this view. Further, I observed that the proposed access would offer suitable visibility in both directions.
17. As a result of these findings, I conclude that the proposal would not cause any harm to highway safety and complies with Policy G1 (2) 'Transport Provision, Access, Highway Layout and Capacity' of the LP.

Other matters

18. The appellant has set out that the proposal would result in a significant number of employees and I accept that the proposal would have significant economic benefits, which is supported by Paragraphs 18 and 28 of the Framework. I also accept that there are likely to be 'spin-off' economic benefits to the local area, although it is difficult to ascertain accurately what these would be. In any event, I consider that such economic benefits carry substantial weight in favour of the scheme.
19. The site is previously developed land and I understand that the site is earmarked for potential redevelopment and these matters weigh in the proposal's favour. I also acknowledge that the nature of the site lends itself for filming activities. However, a number of interested parties have set out that there are alternative sites in more acceptable locations and have provided examples. The appellant has not provided any substantive details on the suitability of alternative sites in the wider area and therefore, I consider that this matter should be afforded little weight.
20. I accept that the site has been used for filming in the past, although, I understand that full details of the filming activities were provided in that case. Consequently, I am not of the view that this sets a precedent for the proposal.
21. The appellant has set out that Class E Part 4 (Schedule 2) of The Town and Country Planning (General Permitted Development) (England) Order 2015 allows (a) the temporary use of any land or buildings for a period not exceeding 9 months in any 27 month period for the purpose of commercial film-making; and (b) the provision on such land, during the filming period, of any temporary structures, works, plant or machinery required in connection with that use. The appellant has, however, set out that such limitations do not provide suitable flexibility in regard to scale and duration. Whilst such permitted development rights are a material consideration, Class E E.2(2) sets

out that prior approval for such activities is required from the local planning authority, which includes considerations such as noise and light impacts. Consequently, I afford limited weight to such permitted development rights and to any potential fall-back position.

Overall conclusion

22. The proposal would be inappropriate development and the Framework establishes that substantial weight should be given to any harm to the Green Belt. Given the temporary nature of the development, I consider that this matters carries moderate weight against the scheme. There would also be a considerable loss of openness for the 12 month temporary period attracting a moderate level of weight against the proposal and this harm is in addition to the inappropriate nature of the proposal. I consider that the scheme in the absence of any substantive details of activities has the potential to cause harm to the living conditions of the occupants of neighbouring properties and I cannot be sure that the development would not have any unacceptable ecological impacts. Both of these matters carry significant weight against the scheme.
23. On the other hand, the proposal would result in significant economic benefits that carry substantial weight in favour of the scheme. The site is also previously developed land and is potentially earmarked for redevelopment.
24. I have afforded little weight to the appellant's view that there are no obvious other sites in the wider area and to any potential fall-back position from permitted development rights. Further, I consider that previous filming on the site does not set a precedent for the proposal, as in that case full details of the proposed activities were provided. Whilst I have found that the proposal would not cause any harm to highway safety this is a matter of neutral weight.
25. On balance, I consider that the identified benefits of the proposal individually or in combination do not clearly outweigh the harm to the Green Belt by reason of inappropriateness, and the other identified harm. Consequently, very special circumstances do not exist and the proposal runs contrary to Section 9 of the Framework.
26. Interested parties have raised a large number of other concerns. However, as I am dismissing the appeal on other grounds, such matters do not alter my overall conclusion and have therefore not had a significant bearing on my decision.
27. For the reasons given above and having regard to all other matters raised, the appeal is dismissed.

Jonathan Manning

INSPECTOR

Nexus Planning

Reading

5th Floor Thames Tower
Station Road
Reading RG1 1LX

T: 0118 214 9340

nexusplanning.co.uk