

## Report of the Head of Planning, Transportation and Regeneration

<b>Address</b>	WEST LONDON FILM STUDIOS SPRINGFIELD ROAD HAYES
<b>Development:</b>	Development of land north of playing pitches to provide an extension to West London Film Studios comprising construction of new sound stages, workshops and office accommodation, entrance structures and reception and security offices (Use Class Sui Generis), creation of new vehicular and pedestrian accesses from Springfield Road, with associated car parking, landscaping and the provision of an ecological enhancement area/landscape buffer zone.
<b>LBH Ref Nos:</b>	46378/APP/2019/2970
<b>Drawing Nos:</b>	Archaeology and Heritage Assessment BSA1940_1b July 2019 Response to LPA Comments: Landscape, Green Infrastructure and Greer Belt 11842_R07_RH_MM 17th Dec 2019 Supplemental Note on Land Availability & Building Suitability 20th Nov 2019 Proposed development for Film Sound Stages and ancillary buildings Development Appraisal Explanation Designer Response Statement (Flood Risk) 6100501-MLM-ZZ-XX-RP-C 0002-DR-0-101219 Botanical Survey Report 11842_R04_JM_LP 26th June 2019 Reptile Survey Report 11842_R03_RB_HB_13th June 2019 Economic Impact Appraisal September 2019 1918708 1st July 2019 11842 P12a Rev A (Sheet 1 and 2 CGI West London Film Studios View 01 CGI West London Film Studios View 02 CGI West London Film Studios View 03 Hillingdon Chamber of Commerce Aeronauts support letter Akshay Kumar Letter Alice Dawson - WLFS planning letter AP Switchgear - WLFS New site letter of support AG PAPER AK Builders Merchants Aidan Elliot Support Letter Ark Electrical Charles Wilson Letter Elveys Cleaning Services Costa Coffee Letter Goals - Support Letter for West London Film studios Hyatt Hotel - Support Letter British Film Commission and Film London - UK Studios Hireworks - Support Letter HYFC - West London Studio Football Julie Clark Letter LAD wlfs support Guru Nanak Sikh Academy - Support Letter Feature Medical Maree Gecks Supporting Letter

Macarena Montero Expansion Letter  
Mermaid Design - Support Letter  
MU  
Plank Supporting Letter  
MARVEL - West London Studios UK Support Letter  
Netflix - West London Studios Letter 1-28-2018  
Pact Letter of Support - West London Studios  
Shane Harford Supporting Letter  
THL - Letter of Support  
Toff Guys - West London Film Studios  
West London Film Studio Expansion Support - The G  
WLFS - Trinity Letter  
Last Christmas  
IMC - West London studios expansion letter  
WLFS Letter of Recommendation Ben Ah-Time  
Letter of Intent - MADE  
YayaProductionsLtd WLFS Letter Rev  
West London Studio SkyEx  
Location Secure west london expansion  
Marco Calabrese PS - Viva La Madness  
Adrian Kelly PM Killing Eve Support Letter  
Land Availability Report Sept 2018  
Covering Letter dated 6th Sept 2018  
SuDS Management Plan 6100501-MLM-ZZ-XX-RP-C-000  
1806.100 Rev B  
1806.101 Rev B  
1806.102 Rev B  
1806.103 Rev B  
1806.104 Rev B  
1806.105 Rev B  
1806.106 Rev B  
1806.107 Rev B  
1806.108 Rev B  
1806.109 Rev B  
1806.110 Rev B  
11842 P12a Rev B (Sheet 1 of 2)  
11842 P12a Rev B (Sheet 2 of 2)  
Design and Access Statement dated October 2020  
Car Parking Management Plan dated October 2020  
Transport Assessment dated October 2020  
Landscape, Visual and Green Belt Appraisal dated October 2020  
Ecology Technical Note Update dated October 2020  
Landscape Management Plan dated October 2020  
Landscape Specification dated October 2020  
Air Quality Assessment Report dated October 2020  
Drainage Strategy dated October 2020  
Energy Statement for Planning dated October 2020  
Environmental Noise Report dated October 2020  
External Lighting Statement dated October 2020  
Planning Statement dated October 2020

Sustainability Statement dated October 2020  
Travel Plan dated October 2020  
WLFS Supporting Information  
1806 101 Rev. C

<b>Date Plans Received:</b>	05/09/2019	<b>Date(s) of Amendment(s):</b>	05/09/2019
<b>Date Application Valid:</b>	09/09/2019		12/09/2019
			21/11/2019
			13/01/2020
			18/12/2019
			16/12/2019
			27/11/2020

## 1. SUMMARY

The application seeks planning permission to provide a film studio with new sound stages, workshops with ancillary office accommodation as an extension to the existing West London Film Studios situated 150m to the south of the site.

The application site lies entirely within the Green Belt. The application proposal does not fall within the exceptions outlined in paragraph 145 of the NPPF, the proposed development would therefore be inappropriate development in the Green Belt, and should not therefore be approved except in very special circumstances. The applicant has set out the very special circumstances and other considerations that would outweigh the harm to the openness of the Green Belt.

The proposed development would cause some limited harm to the openness of the Green Belt and the proposal is considered to conflict with one of the five purposes of Green Belt to a limited extent. It is considered the characteristics of the particular site, the relationship to the existing West London Film Studios, the individual circumstances of the film industry, and the details of the supporting economic case, taken together, clearly outweigh the harm to the Green Belt by reason of inappropriateness and harm to openness, even when affording this harm considerable weight. It is concluded very special circumstances exist to warrant allowing the inappropriate development, overriding the identified conflict with the Development Plan.

Officers have not identified any other material considerations that weigh against the development. For the reasons outlined within the report, it is recommended that planning permission is granted subject to a Section 106 legal agreement and planning conditions.

The application is referable to the Mayor of London for a Stage 2 response and the Secretary of State as it is a development comprising over 1,000 sq.m of floorspace and by reason of its scale or nature, would have an impact on the openness of the Green Belt.

## 2. RECOMMENDATION

**That delegated powers be given to the Head of Planning, Transportation and Regeneration to grant planning permission, subject to the following:**

**1. That the application be referred to the Mayor under Article 5 of the Town and Country Planning (Mayor of London) Order 2008.**

**2. That should the Secretary of State not call in the application, the application be deferred for determination by the Head of Planning, Transportation and Regeneration for an approval.**

**3. That the Council enter into a legal agreement with the applicant under Section 106 of the Town and Country Planning Act 1990 (as amended) to secure the following:**

**i) To secure all necessary highway works including written agreement from the Local Planning Authority; (Section 278);**

**ii) Highways contribution of £110,000 towards highways improvements works along Springfield Road;**

**iii) A full and formal Travel Plan with associated £20,000.00 bond to include a Sustainable Transport Measures is required to be submitted and agreed in writing by the LPA before occupation of the development. Thereafter, the Travel Plan is required to be reviewed annually to monitor and if required, update and/or amend the document to the satisfaction of the LPA, in order that its aims and objectives are achieved;**

**iv) Carbon Fund: a contribution for a carbon fund to make up for the shortfall for this development and in order to make the development policy compliant (£1800 for every tCO2/annum that is below the zero carbon target);**

**v) Air Quality in line with the SPD and given the site is located in an air quality management area, a contribution in the sum of £95,158;**

**vi) Employment Strategy and Construction Training - either a contribution equal to the formula within the Council Planning Obligations Supplementary Planning Document (SPD) 2014, or an in-kind training scheme equal to the financial contribution delivered during the construction period of the development. Details shall be in accordance with the Council Planning Obligations SPD with the preference being for an in-kind scheme to be delivered. Securing an Employment/Training Strategy Agreement is Council's priority. Financial Contribution will only be accepted in exceptional circumstances; and**

**vii) Project Management and Monitoring Fee: a financial contribution equal to 5% of the total cash contributions towards the management and monitoring of the resulting agreement.**

**4) That the applicant meets the Council's reasonable costs in the preparation of the Section 106 agreement/Deed of Variation and any abortive work as a result of the agreement not being completed.**

**5) That officers be authorised to negotiate and agree the detailed terms of the proposed agreement and conditions of approval.**

**6) That if any of the heads of terms set out above have not been agreed and the Section 106 Agreement has not been finalised before within 6 months of the committee meeting, or any other period deemed appropriate that delegated**

authority be given to the Head of Planning, Transportation and Regeneration to refuse the application for the following reason:

'The development has failed to secure obligations relating to a travel plan, highways improvements, air quality, low carbon and construction training. The scheme therefore conflicts with Policies DMCI 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020); the adopted Planning Obligations Supplementary Planning Document (July 2014); Policies 8.2 of the London Plan (March 2016); Policy DF1 of the London Plan - Intend to Publish Version (December 2019); and paragraphs 54-57 of the National Planning Policy Framework (February 2019).

7) That if the application is approved, the following conditions be attached:-

**1 COM3 Time Limit**

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

**REASON**

To comply with Section 91 of the Town and Country Planning Act 1990.

**2 COM4 Accordance with Approved Plans**

The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans, numbers: 1806.100 Rev B, 1806.101 Rev B, 1806.102 Rev B, 1806.103 Rev B, 1806.104 Rev B, 1806.105 Rev B, 1806.106 Rev B, 1806.107 Rev B, 1806.108 Rev B, 1806.109 Rev B and 1806.110 Rev B and shall thereafter be retained/maintained for as long as the development remains in existence.

**REASON**

To ensure the development complies with the provisions Hillingdon Local Plan: Part Two Development Management Policies (2020) and the London Plan (2016).

**3 COM5 General compliance with supporting documentation**

The development hereby permitted shall not be carried out except in complete with the specified supporting plans and/or documents:

Design & Access Statement October 2020 Rev.A  
Energy Assessment October 2020 Rev 02  
Transport Assessment (including a Travel Plan and Car Parking Management Plan)  
October 2020  
Landscape, Visual and Green Belt Appraisal October 2020  
Ecology Technical Note Update October 2020 (incorporating Botanical Survey Report July 2019 and Reptile Survey Report July 2019)  
Landscape Specification Rev A October 2020  
Landscape Management Plan October 2020  
Neighbouring Property Overview  
Noise Impact Assessment October 2020 Rev A  
Air Quality Assessment October 2020 Rev 05  
Drainage Statement October 2020 Rev 05  
Phase 1 Land Contamination Report  
Heritage and Archaeology Report

Economic Impact Appraisal  
Lighting Statement October 2020 Rev 03  
Planning Statement October 2020  
Travel Plan October 2020

Thereafter the development shall be retained/maintained in accordance with these details for as long as the development remains in existence

#### REASON

To ensure the development complies with the provisions of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) and the London Plan (2016).

#### **4 OM19 Construction Management Plan**

Prior to development commencing, the applicant shall submit a demolition and construction management plan to the Local Planning Authority for its approval. The plan shall detail:

- (i) The phasing of development works.
- (ii) The hours during which development works will occur (please refer to informative I15 for maximum permitted working hours).
- (iii) A programme to demonstrate that the most valuable or potentially contaminating materials and fittings can be removed safely and intact for later re-use or processing.
- (iv) Measures to prevent mud and dirt tracking onto footways and adjoining roads (including wheel washing facilities).
- (v) Traffic management and access arrangements (vehicular and pedestrian) and parking provisions for contractors during the development process (including measures to reduce the numbers of construction vehicles accessing the site during peak hours).
- (vi) Measures to reduce the impact of the development on local air quality and dust through minimising emissions throughout the demolition and construction process.
- (vii) The storage of demolition/construction materials on site.

The approved details shall be implemented and maintained throughout the duration of the demolition and construction process.

#### REASON

To safeguard the amenity of surrounding areas and manage highways impacts in accordance with Policies DMHB 11, DMT 2 and DMEI 14 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020).

#### **5 COM9 Landscaping (car parking & refuse/cycle storage)**

Prior to above ground works, a landscape scheme has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include: -

1. Details of Soft Landscaping
  - 1.a Planting plans (at not less than a scale of 1:100),
  - 1.b Written specification of planting and cultivation works to be undertaken,
  - 1.c Schedule of plants giving species, plant sizes, and proposed numbers/densities where appropriate
2. Details of Hard Landscaping
  - 2.a Refuse Storage
  - 2.b Cycle Storage for 24 spaces and shower and changing facilities within the development for staff

- 2.c Means of enclosure/boundary treatments
- 2.d Car Parking Layouts for 87 spaces (including demonstration that 20% of all parking spaces are served by active EVCP and 80% of all car parking spaces are served by passive EVCP, 9 spaces are reserved for blue badge holders with a further) and 5 motorcycle parking spaces with anchor points
- 2.e Hard Surfacing Materials
- 2.f External Lighting
- 2.g Gas pipeline mitigation (the landscaping plans should show any reinforced cross-overs or no build zones required to satisfy Cadent gas).

### 3. Living Walls and Roofs

- 3.a Details of the inclusion of living walls and roofs
- 3.b Justification as to why no part of the development can include living walls and roofs

### 4. Details of Landscape Maintenance

- 4.a Landscape Maintenance Schedule for a minimum period of 5 years.
- 4.b Proposals for the replacement of any tree, shrub, or area of surfing/seeding within the landscaping scheme which dies or in the opinion of the Local Planning Authority becomes seriously damaged or diseased.

### 5. Schedule for Implementation

### 6. Other

- 6.a Existing and proposed functional services above and below ground
- 6.b Proposed finishing levels or contours

Thereafter the development shall be carried out and maintained in full accordance with the approved details.

### REASON

To ensure that the proposed development will preserve and enhance the visual amenities of the locality and provide adequate facilities in compliance with policies DMHB 11, DMHB 14, DMEI 1 and DMT 6 of the Hillingdon Local Plan Part 2 (2020) and Policies 5.11 and 5.17 of the London Plan (2016).

## **6 COM26 Ecology**

Prior to above ground works, a plan for the enhancement of biodiversity shall be submitted to and approved in writing by the Local Planning Authority. The plan shall detail the measures to be incorporated within the 'buffer zone' (north western boundary) and shall include features such as logpiles, artificial refugia, bat and bird boxes. This area should also incorporate at least two waterbodies (i.e. ponds) to provide further diversification of habitat unless otherwise agreed in writing with the Local Planning Authority. The plan shall also identify the inclusion of bat and bird boxes within built structure of the development. Finally, the plan shall be accompanied by a maintenance strategy that demonstrate the 'buffer zone' shall be managed in perpetuity for its ecological value. The development must proceed in accordance with the enhancement plan and maintenance strategy.

### Reason

To ensure the development contributes to the provision of biodiversity value in accordance with Policy EM7 of the Local Plan: Part One (2012) and Policy DMEI 2of the Hillingdon Local Plan Part 2 (2020).

## **7 NONSC Carbon Reduction**

Prior to above ground works, a detailed energy assessment shall be submitted to and approved in writing by the Local Planning Authority. The assessment shall provide:

- 1 - Full baseline information on the regulated energy demand (in kgCO<sub>2</sub> and kWhr)
- 2 - full details of the energy efficiency measures to be included within the development to achieve the London Plan 'be clean' energy requirements and how these will impact the baseline and be monitored to ensure their efficacy.
- 3 - full details and specifications of the air source heat pumps in accordance with the outline energy strategy (MLM, 7134640-MLM-ZZ-XX-RP-SU-0001) and how they will impact on the baseline.

The development must proceed in accordance with the approved assessment.

Reason: To ensure the development contributes to the management of carbon emissions in accordance with London Plan Policy 5.2.

## **8 NONSC Sustainable Urban Drainage Scheme**

Prior to commencement,(excluding demolition and site clearance) a scheme for the provision of sustainable water management shall be submitted to, and approved in writing by the Local Planning Authority. The scheme shall clearly demonstrate how it, manages water and demonstrate ways of controlling the surface water on site by providing information on a scheme shall clearly demonstrate the following:

a) Suds features:

i. A site investigation must be provided to establish the infiltration potential and level of groundwater on the site to determine appropriate SuDs methods (This should be undertaken at the appropriate time of year as groundwater levels fluctuate).

ii. Evaluation of all sustainable urban drainage options in accordance with the hierarchy set out in Policy 5.13 of the London Plan. Where the proposal does not utilise the most sustainable solution, justification must be provided, Living Walls and Roofs and on site vegetation should be integrated in any drainage design Any proposal should use of methods to minimise the use of potable water through water collection, reuse and recycling by:

- incorporating water saving measures and equipment.
- providing details of water collection facilities to capture excess rainwater and or
- providing details of how rain and grey water will be recycled and reused in the development.

iii. calculations showing storm period and intensity and volume of storage required to control surface water and size of features to control that volume to Greenfield run off rates at a variety of return periods including 1 in 1, 1in 30, 1 in 100, and 1 in 100 year plus Climate change,

iv. Safe access and egress must be demonstrated - any above ground storage and or overland flooding or flows paths should be mapped, ( please include depths and velocities and hazards ) above the 100, plus climate change.

v. During Construction i. How temporary measures will be implemented to ensure no increase in flood risk from commencement of construction.

vi. Long Term Management and Maintenance of the drainage system including clear plans showing the responsibility of different parties should be provided, such as the landowner, PMC, sewers offered for adoption and that to be adopted by the Council Highways services. Where it is a PMC the details of the body legally responsible for the implementation of the management and maintenance plan must be provided.



## REASON

To ensure that surface water run off is controlled to ensure the development does not increase the risk of flooding contrary to: Policy EM6 Flood Risk Management in Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012), Policy DMEI 10 Water Management, Efficiency and Quality in Hillingdon Local Plan Part 2 Development Management Policies (2020), Policies 5.12, 5.13 and 5.15 of the London Plan (2016), National Planning Policy Framework (2019), and the Planning Practice Guidance (Flood Risk and Coastal Change March 2014).

### **9 NONSC External Lighting**

Prior to the relevant part of the works, an external lighting scheme shall be submitted and approved in writing by the Local Planning Authority. Details shall include measures to ensure that external lights are automatically turned off when the buildings are not in use. The development shall thereafter be completed in accordance with the approved scheme and shall remain in place for the lifetime of the development.

## REASON

To protect the biodiversity along the Grand Union Canal in accordance with policies DMHB 1, DMHB 8, DMHB 11 and DMEI 7 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) and to reduce energy demands in accordance with Policy 5.2 of the London Plan (2016).

### **10 NONSC Ecology**

Prior to above ground works, a scheme for the inclusion of ecological enhancement features within the proposal shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall identify measures within the fabric of the building (bat and bird boxes) and within the landscaping that will provide benefits for flora and fauna - all features must be clearly annotated on an appropriately scaled plan.

The development must proceed in accordance with the approved scheme unless otherwise agreed in writing with the Local Planning Authority.

## REASON

To ensure the development contributes to ecological enhancement in accordance with Policy EM7 (Local Plan) and Policy 7.28 of the London Plan.

### **11 NONSC Low Emissions Strategy**

The development shall not be occupied until a low emissions strategy has been submitted to and approved in writing by the LPA. The low emission strategy shall include:

1. Fleet composition - to include a quantified baseline for the current fleet, with targets set for the continued use of lower emission vehicles. This should be reviewed on annual basis to demonstrate continual improvement from this source of emissions, with a view to move towards a Euro VI fleet as soon as practicable;
2. Traffic management schemes - to include the enforcement of no-idling practices; and
3. Emissions from energy plant - to include the use of low NOx boilers.

The approved details shall be implemented and maintained throughout the duration of the demolition and construction process.

## REASON

To ensure the development complies with Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Policy 7.14 of the London Plan (2016) and paragraph 124 of the National Planning Policy Framework.

**12 NONSC Non Road Mobile Machinery**

All Non Road Mobile Machinery (NRMM) used on major development sites within the London Borough of Hillingdon are required to meet Stage IIIA of EU Directive 97/68/EC and the development site must be registered online on the NRMM website at <http://nrmm.london/>.

**REASON**

To ensure the development complies with Policy EM8 of the Hillingdon Local Plan: Part 1, Policy 7.14 of the London Plan (2016) and paragraph 124 of the National Planning Policy Framework.

**13 NONSC Restriction of Uses**

Notwithstanding the Town and Country Planning (Use Classes) Order (as amended), or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification, the development shall not be used for any purpose other than as a film studios.

**REASON**

To ensure that the provisions of the proposed development are secured to the film studios use to prevent detrimental impacts to the local highway network, in accordance with Policies DMT 1, DMT 2 and DMT 5 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

**14 COM14 No additional internal floorspace**

Notwithstanding the provisions of Section 55 of the Town and Country Planning Act 1990 (or any others revoking and re-enacting this provision with or without modification), no additional internal floorspace shall be created in excess of that area expressly authorised by this permission.

**REASON**

To enable the Local Planning Authority to assess all the implications of the development and to ensure that adequate parking and loading facilities can be provided on the site, in accordance with Policy DMT 1 and DMT 2 of the Local Plan: Part Two Development Management Policies (2020).

**15 NONSC Parking Allocation Scheme**

The development hereby approved shall not be occupied until a parking allocation scheme has been submitted to, and approved in writing by, the Local Planning Authority should the development be subdivided. The parking allocation scheme shall, as a minimum, include the appropriate level of provision for each use class and dedicated in such a manner for the life-time of the development.

**REASON**

To ensure that an appropriate level of car parking provision is provided on site in accordance with Policy DMT 6 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) and Chapter 6 of the London Plan (2016).

**16 NONSC Servicing and Delivery Plan**

Prior to the occupation of development details of a Delivery and Servicing Plan which identifies efficiency and sustainability measures to be undertaken once the development is operational shall be submitted to and approved in writing by the Local Planning Authority in consultation with Transport for London. This shall incorporate measures to minimise vehicle deliveries/servicing during am and pm peak hours.

## REASON

To encourage out of hours/off peak servicing to help mitigate the site's contribution to local congestion levels in compliance with Policies DMT 1 and 2 of the Hillingdon Local Plan Part 2 (2020).

### **17 NONSC Contaminated Land**

(i) Prior to commencement, other than demolition a scheme to deal with contamination shall be submitted to the Local Planning Authority (LPA) in accordance with the Supplementary Planning Guidance Document on Land Contamination, and approved by the LPA. All works which form part of the remediation scheme shall be completed before any part of the development is occupied or brought into use unless the Local Planning Authority dispenses with any such requirement specifically and in writing. The scheme shall include all of the following measures unless the LPA dispenses with any such requirement specifically and in writing:

(a) A further programme of targeted soil and groundwater sampling, monitoring and testing, together with reporting of the results of analysis and Detailed Quantitative Risk Assessment, shall be carried out by a suitably qualified and accredited consultant/contractor. The report should also clearly identify all risks, limitations and recommendations for remedial measures to make the site suitable for the proposed use; and

(b) A written method statement providing details of the remediation scheme and how the completion of the remedial works will be verified shall be agreed in writing with the LPA prior to commencement of each phase, along with the details of a watching brief to address undiscovered contamination. No deviation shall be made from this scheme without the express agreement of the LPA prior to its implementation.

(ii) If during remedial or development works contamination not addressed in the submitted remediation scheme is identified an addendum to the remediation scheme shall be agreed with the LPA prior to implementation; and

(iii) Upon completion of the approved remedial works, this condition will not be discharged until a comprehensive verification report has been submitted to and approved by the LPA. The report shall include the details of the final remediation works and their verification to show that the works for each phase have been carried out in full and in accordance with the approved methodology.

(iv) No contaminated soils or other materials shall be imported to the site. All imported soils for landscaping purposes shall be clean and free of contamination. Before any part of the development is occupied, all imported soils shall be independently tested for chemical contamination, and the results of this testing shall be submitted and approved in writing by the Local Planning Authority. All soils used for gardens and/or landscaping purposes shall be clean and free of contamination.

## REASON

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems and the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Policy DME1 12 of the Local Plan: Part Two - Development Management Policies (2020).

### **18 NONSC Fire Strategy**

A Fire Strategy Report shall be submitted to and agreed in writing by the local planning authority prior to above ground works. Thereafter it shall be implemented on site in conjunction with a suitably qualified consultant. Thereafter the development shall not be carried out other than in accordance with the approved details.

**REASON**

To ensure that the development meets Fire Safety Standards in accordance with policy D12 of the draft London Plan (Intend to Publish version 2019).

**19 NONSC Bird Hazard Management Plan**

Prior to the commencement of any superstructure works, a Bird Hazard Management Plan shall be submitted to and approved in writing by the Local Planning Authority, in consultation with Heathrow Airport Ltd.

The Bird Hazard Management Plan shall include design measures to:-

- Manage any flat/shallow pitched/green roofs on buildings within the site which may be attractive to nesting, roosting and "loafing" birds.
- Minimise any increase in the numbers of hazardous species (primarily large or flocking birds) as a result of the development proposed.
- Prevent gulls from breeding (using appropriate licensed means) on site.

The Bird Hazard Management Plan shall be implemented as approved and shall remain in force for the life of the buildings. No subsequent alterations to the plan are to take place unless first submitted to and approved in writing by the Local Planning Authority.

**REASON**

To minimise the potential of the works approved to provide a habitat desirable to hazardous large and/or flocking birds which have the potential to pose a considerable hazard to aviation safety. To ensure the development accords with the requirements of Policy DMAV1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) and paragraphs 95 and 182 of the National Planning Policy Framework (February 2019).

**20 A20 Access to Buildings for People with Disabilities**

Development shall not commence until details of access to building entrances (to include ramped/level approaches, signposting, types and dimensions of door width and lobby openings) to meet the needs of people with disabilities have been submitted to and approved by the Local Planning Authority. The facilities should comply with BS 5810: 1979 (Design Note 18 in the case of educational buildings) and be approved prior to the occupation of the development.

**REASON**

To ensure that people with disabilities have adequate access to the development in accordance with Policy R16 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

**21 B10 Parking/Turning/Loading Arrangements etc.**

The roads/turning/loading facilities/sight lines and parking areas (including the marking out of parking spaces) shown on the approved plans shall be constructed prior to occupation of the development, thereafter permanently retained and used for no other purpose.

REASON

To ensure that adequate facilities are provided.

**22 COM25 Loading/unloading/deliveries**

There shall be no loading or unloading of vehicles, including the collection[premises] [site]] shall not be used [for loading and unloading] [for loading and unloading in external areas] [delivery and the loading or unloading of goods] outside the hours of [T] and [T], Monday to Friday, and between the hours of [T] and [T] on Saturdays. The [premises] [site] [specified plant or use] shall not be used on Sundays or Bank Holidays.

REASON

To safeguard the residential amenity of the occupiers of adjoining and nearby properties in accordance with policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020).

**23 COM31 Secured by Design**

The building(s) shall achieve 'Secured by Design' accreditation awarded by the Hillingdon Metropolitan Police Crime Prevention Design Adviser (CPDA) on behalf of the Association of Chief Police Officers (ACPO). No building shall be occupied until accreditation has been achieved.

REASON

In pursuance of the Council's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in excising its planning functions; to promote the well being of the area in pursuance of the Council's powers under section 2 of the Local Government Act 2000 to ensure the development provides a safe and secure environment in accordance with Hillingdon Local Plan Part 2 policy DMHB 15 and London Plan (2016) Policies 7.1 and 7.3.

**INFORMATIVES**

**1 I52 Compulsory Informative (1)**

The decision to GRANT planning permission has been taken having regard to all relevant planning legislation, regulations, guidance, circulars and Council policies, including The Human Rights Act (1998) (HRA 1998) which makes it unlawful for the Council to act incompatibly with Convention rights, specifically Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

**2 I53 Compulsory Informative (2)**

The decision to GRANT planning permission has been taken having regard to the policies and proposals in the Hillingdon adopted Local Plan (21012 and 2020), including Supplementary Planning Guidance, and to all relevant material considerations, including the London Plan (2016) and national guidance.

NPPF- 12	NPPF-12 2018 - Achieving well-designed places
NPPF- 14	NPPF-14 2018 - Meeting the challenge of climate change, flooding and coastal change
NPPF- 2	NPPF-2 2018 - Achieving sustainable development
NPPF- 4	NPPF-4 2018 - Decision-making
LPP 3.1	(2016) Ensuring equal life chances for all
LPP 5.12	(2016) Flood risk management
LPP 5.13	(2016) Sustainable drainage
LPP 4.6	(2016) Support for and enhancement of arts, culture, sport and

	entertainment provision
LPP 4.12	(2016) Improving opportunities for all
LPP 5.2	(2016) Minimising Carbon Dioxide Emissions
LPP 5.3	(2016) Sustainable design and construction
LPP 5.7	(2016) Renewable energy
LPP 5.9	(2016) Overheating and cooling
LPP 6.3	(2016) Assessing effects of development on transport capacity
LPP 6.5	(2016) Funding Crossrail and other strategically important transport infrastructure
LPP 6.9	(2016) Cycling
LPP 6.10	(2016) Walking
LPP 6.13	(2016) Parking
LPP 7.2	(2016) An inclusive environment
LPP 7.3	(2016) Designing out crime
LPP 7.14	(2016) Improving air quality
LPP 7.13	(2016) Safety, security and resilience to emergency
LPP 7.15	(2016) Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
LPP 8.2	(2016) Planning obligations
DMCI 7	Planning Obligations and Community Infrastructure Levy
DME 2	Employment Uses Outside of Designated Sites
DMEI 2	Development of Land Affected by Contamination
DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMEI 1	Living Walls and Roofs and Onsite Vegetation
DMEI 10	Water Management, Efficiency and Quality
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 7	Biodiversity Protection and Enhancement
DMEI 9	Management of Flood Risk
DMHB 11	Design of New Development
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 6	Vehicle Parking
LDF-AH	Accessible Hillingdon , Local Development Framework, Supplementary Planning Document, adopted January 2010
SPD-PO	Planning Obligations Supplementary Planning Document, adopted July 2008

### **3            170            LBH worked applicant in a positive & proactive (Granting)**

In dealing with the application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our statutory policies from Local Plan Part 1, Local Plan Part 2, Supplementary Planning Documents, Planning Briefs and other informal written guidance, as well as offering a full pre-application advice service, in order to ensure that the applicant has been given every opportunity to submit an application which is likely to be considered favourably.

### **4            115            Control of Environmental Nuisance from Construction Work**

Nuisance from demolition and construction work is subject to control under the Control of Pollution Act 1974, the Clean Air Act 1993 and the Environmental Protection Act 1990. You should ensure that the following are complied with:

- (i) Demolition and construction works should only be carried out between the hours of 0800 and 1800 on Monday to Friday and between the hours of 0800 and 1300 on Saturday. No works should be carried out on Sundays, Public or Bank Holidays;
- (ii) All noise generated during such works should be controlled in compliance with British Standard 5228, and use "best practicable means" as defined in section 72 of the Control of Pollution Act 1974;
- (iii) Measures should be taken to eliminate the release of dust, odours and other emissions caused by the works that may create a public health nuisance. Guidance on control measures is given in "The control of dust and emissions from construction and demolition: best practice guidelines", Greater London Authority, November 2006; and
- (iv) No bonfires that create dark smoke or cause nuisance to local residents should be allowed at any time.

You are advised to consult the Council's Environmental Protection Unit to seek prior approval under Section 61 of the Control of Pollution Act 1974 if you anticipate any difficulty in carrying out the works other than within the normal working hours set out above, and by means that would minimise disturbance to adjoining premises. For further information and advice, contact the Environmental Protection Unit, 3S/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW (tel. 01895 250155).

## **5            I59                            Councils Local Plan : Part 1 - Strategic Policies**

On this decision notice policies from the Councils Local Plan: Part 1 - Strategic Policies appear first, then adopted Local Plan Part 1 policies (2020), then London Plan Policies (2016).

## **6            I60                            Cranes**

Given the nature of the proposed development it is possible that a crane may be required during its construction. The applicant's attention is drawn to the requirement within the British Standard Code of Practice for the safe use of Cranes, for crane operators to consult the aerodrome before erecting a crane in close proximity to an aerodrome. This is explained further in Advice Note 4, 'Cranes and Other Construction Issues' (available at [www.aoa.org.uk/publications/safeguarding.asp](http://www.aoa.org.uk/publications/safeguarding.asp))

## **7            I23                            Works affecting the Public Highway - Vehicle Crossover**

The development requires the formation of a vehicular crossover, which will be constructed by the Council. This work is also subject to the issuing of a separate licence to obstruct or open up the public highway. For further information and advice contact: - Highways Maintenance Operations, 4W/07, Civic Centre, Uxbridge, UB8 1UW.

## **8            I23B                            Heavy Duty Vehicle Crossover**

Prior to work commencing, you are advised to submit an application for a Heavy Duty Vehicle Crossover to Highways Maintenance, 4W/07, Civic Centre, Uxbridge, UB8 1UW to prevent damage to the highway from construction vehicles entering and leaving the site.

## **9**

The Equality Act 2010 seeks to protect people accessing goods, facilities and services from discrimination on the basis of a 'protected characteristic', which includes those with a disability. As part of the Act, service providers are obliged to improve access to and

within the structure of their building, particularly in situations where reasonable adjustment can be incorporated with relative ease. The Act states that service providers should think ahead to take steps to address barriers that impede disabled people.

## 10

All facilities, to include stage, performance and changing/shower areas, should therefore be fully accessible to BS 8300:2018, to allow equal participation by everyone, including wheelchair users.

### 3. CONSIDERATIONS

#### 3.1 Site and Locality

The application site lies to the west of Springfield Road and has an area of 1.3 hectares occupied by an area of unmanaged grassland situated on the west side of Springfield Road. The site is fenced off from public access by palisade security fencing. The square plot lies to the south of an industrial estate and to the east of Minet Country Park and the Hillingdon Cycle Circuit. The land to the south is also unmanaged grassland with a small building in the south-east corner.

The application site is located 150m to the north of the existing West London Film Studios facility which has been operating since 2005. The existing facility provides five independent studios for hire together with workshops (for set construction) and production offices (for rehearsals/script writing and administration etc). The applicant states within the submission that the current facility is utilised to 90% of its capacity with production companies often being turned away due to extensive demand.

Built form to the immediate north and east of the site comprises the Springfield Road Strategic Industrial Land consisting of a mix of large scale industrial and commercial units, storage yards and car parking.

The site lies in Flood Zone 1, it is designated as Green Belt, Site of Importance for Nature Conservation (SINC), and within a Ossie Garden Air Quality Focus Area (AQFA). There are no trees, TPO's or Conservation Area designations affecting the site.

Springfield Road connects to the A4020 Uxbridge Road, approximately 250 metres east of its junction with the TLRN (A312 The Parkway). The site has a public transport accessibility level (PTAL) of 2.

#### 3.2 Proposed Scheme

This full application seeks planning permission for development of a site within the Green Belt in close proximity to the existing West London Film Studios. The proposal comprises construction of new sound stages, workshops (Use Class Sui Generis) with ancillary office accommodation, entrance structures and reception and security offices. The proposal includes the creation of new vehicular and pedestrian accesses from Springfield Road, with associated car parking, and landscaping.

The application is supported by numerous technical reports, including a Sustainability Appraisal, Design & Access Statement, Energy Assessment, Transport Assessment (including a Travel Plan and Car Parking Management Plan), Landscape, Visual and Green Belt Appraisal, Botanical Survey report, Reptile Survey Report, Noise Impact Assessment,



Air Quality Assessment, Drainage Statement, Phase 1 Land Contamination Report, Heritage and Archaeology Report, Economic Impact Appraisal and Lighting Statement.

The Economic Impact Appraisal describes the status of the UK Television and Film Industry, its growing economic significance to the UK economy and the projected local economic benefits of the proposals should the development come forward. The proposed new development is anticipated to directly employ 5 full-time and 5 part-time operational staff, however the report states that The West London Film Studios currently provides 220 - 295 local jobs contributing around £18-£24m of local economic value. Approval of the planned expansion of the film studios would provide an estimated further 220-290 net additional jobs, generating an estimated £18 - £23m net additional value.

#### Access

Vehicular and pedestrian access would be via two new access points off Springfield Road.

#### Amount and Layout

The proposal will consist of a new film studio complex comprising four bespoke acoustic production stages together with associated offices, workshop and ancillary accommodation. The eaves height of the main stage building will be 15.42m. The total floorspace of the proposed development will be 7,312 sq.m., with a total gross external area of 8,328 sq.m. The main building containing the sound stages would be located centrally within the site with ancillary areas to the east and west. The proposed workshop buildings would be positioned on the western edge of the site adjacent to the Minet Country Park.

Externally car parking and soft landscaping is proposed around the perimeter of the site and green roofs are proposed for the workshop buildings so as to reduce the visual impact of the development from Minet Country Park.

#### Car and Cycle Parking

The application proposes 87 car parking spaces, 9 of which would be accessible. The proposal also includes the provision of 14 passive electric vehicle charging points, in addition to 5 active charging points. Two cycle shelters are proposed providing long stay space for 16 bicycles, in addition 8 short stay cycle spaces are proposed to the front of the site.

#### Refuse

Two communal refuse collection points are proposed with a total of 6 no 1,100 litre wheeled Eurobin containers for general waste and 5 no 1,100 litre wheeled Eurobin containers for recyclable waste. The collection points are located at the front of the site adjacent Springfield Road, one to the south and one to the north, which will allow the refuse collection vehicles to collect the waste from the one way front car park area without entering the rear secure area of the site or having to turn on site.

#### Hours of Operation and Use

The proposed new studio development would be operational 24 hours a day for at least 5 days a week; although some weekend use may also be required. Based on the existing site, most productions operate between the hours of 08:00-20:00 involving numerous

different activities (and staff) at any given time. The whole studio complex could be in use for a variety of purposes across a range of different production companies and for a wide variety of types of filming, from one-off commercials through to major film and television blockbusters. Based on experience of the existing film studio usage, the applicant estimates up to 50 people could be involved during live filming on each operational stage with around 25 people involved in pre- and post-production activities. This averages out around 37.5 people in any given week for each available production stage. With, on average, 4 out of 5 production stages being in use at any one time, this can mean around 150 film and television production crew can be on site at any given time, potentially reaching up to 200 if operating at maximum capacity.

#### Other Matters

The applicant has provided 44 letters of support for the development proposals. These include letters from the Chief Executive of the British Film Commission (BFC) and Film London, Marvel, Netflix and a host of other companies involved in Television and Film production, a number of which are based in the London Borough of Hillingdon. There are also letters of support from the adjacent Guru Nanak Sikh Academy, GOALs, Hayes & Yeading FC, Hyatt Hotel, Skyex and AK Builders Merchants on Springfield Road. There are also letters of support from the Hillingdon Chamber of Commerce, Global Acedemy, Trinity Homeless Charity and MADE Entertainment Charity.

### **3.3 Relevant Planning History**

#### **Comment on Relevant Planning History**

There is no planning history for the site relevant to the proposed film studio development.

### **4. Planning Policies and Standards**

#### Development Plan

Planning law requires that applications for planning permission be determined in accordance

with the development plan, unless material considerations indicate otherwise.

The Development Plan for the London Borough of Hillingdon currently consists of the following documents:

- The Local Plan: Part 1 - Strategic Policies (2012)
- The Local Plan: Part 2 - Development Management Policies (2020)
- The Local Plan: Part 2 - Site Allocations and Designations (2020)
- The West London Waste Plan (2015)
- The London Plan - Consolidated With Alterations (2016)

#### Material Considerations

The National Planning Policy Framework (NPPF) (2019) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

#### Emerging Planning Policies

Paragraph 48 of the National Planning Policy Framework (NPPF) 2019 states that 'Local Planning Authorities may give weight to relevant policies in emerging plans according to:

(a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);

(b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and  
(c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

Draft London Plan (Intend to Publish Version, December 2019)

The GLA consulted upon a draft new London Plan between December 2017 and March 2018 with the intention of replacing the previous versions of the existing London Plan. The Plan was subject to examination hearings from February to May 2019, and a Consolidated Draft Plan with amendments was published in July 2019. The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor on 8th October 2019.

The Mayor has considered the Inspectors' recommendations and, on 9th December 2019, issued to the Secretary of State his intention to publish the London Plan along with a statement of reasons for the Inspectors' recommendations that the Mayor did not wish to accept. The Secretary of State responded on the 13th March 2020 and stated that he was exercising his powers under section 337 of the Greater London Authority Act 1999 to direct that modifications are required. These are set out at Annex 1 of the response, however the letter does also state that if the Mayor can suggest alternative changes to policies that would address the concerns raised, these would also be considered.

More limited weight should be attached to draft London Plan policies where the Secretary of State has directed modifications or where they relate to concerns raised within the letter. Greater weight may be attached to policies that are not subject to modifications from the Secretary of State or that do not relate to issues raised in the letter.

### **UDP / LDF Designation and London Plan**

The following Local Plan Policies are considered relevant to the application:-

Part 1 Policies:

- PT1.E7 (2012) Raising Skills
- PT1.EM1 (2012) Climate Change Adaptation and Mitigation
- PT1.EM6 (2012) Flood Risk Management
- PT1.EM8 (2012) Land, Water, Air and Noise
- PT1.BE1 (2012) Built Environment
- PT1.T1 (2012) Accessible Local Destinations
- PT1.CI1 (2012) Community Infrastructure Provision

Part 2 Policies:

- NPPF- 12 NPPF-12 2018 - Achieving well-designed places
- NPPF- 14 NPPF-14 2018 - Meeting the challenge of climate change, flooding and coastal change
- NPPF- 2 NPPF-2 2018 - Achieving sustainable development

NPPF- 4	NPPF-4 2018 - Decision-making
LPP 3.1	(2016) Ensuring equal life chances for all
LPP 5.12	(2016) Flood risk management
LPP 5.13	(2016) Sustainable drainage
LPP 4.6	(2016) Support for and enhancement of arts, culture, sport and entertainment provision
LPP 4.12	(2016) Improving opportunities for all
LPP 5.2	(2016) Minimising Carbon Dioxide Emissions
LPP 5.3	(2016) Sustainable design and construction
LPP 5.7	(2016) Renewable energy
LPP 5.9	(2016) Overheating and cooling
LPP 6.3	(2016) Assessing effects of development on transport capacity
LPP 6.5	(2016) Funding Crossrail and other strategically important transport infrastructure
LPP 6.9	(2016) Cycling
LPP 6.10	(2016) Walking
LPP 6.13	(2016) Parking
LPP 7.2	(2016) An inclusive environment
LPP 7.3	(2016) Designing out crime
LPP 7.14	(2016) Improving air quality
LPP 7.13	(2016) Safety, security and resilience to emergency
LPP 7.15	(2016) Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
LPP 8.2	(2016) Planning obligations
DMCI 7	Planning Obligations and Community Infrastructure Levy
DME 2	Employment Uses Outside of Designated Sites
DMEI 12	Development of Land Affected by Contamination
DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMEI 1	Living Walls and Roofs and Onsite Vegetation
DMEI 10	Water Management, Efficiency and Quality
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 7	Biodiversity Protection and Enhancement
DMEI 9	Management of Flood Risk
DMHB 11	Design of New Development
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 6	Vehicle Parking

LDF-AH Accessible Hillingdon , Local Development Framework, Supplementary Planning Document, adopted January 2010

SPD-PO Planning Obligations Supplementary Planning Document, adopted July 2008

## **5. Advertisement and Site Notice**

**5.1** Advertisement Expiry Date:- **26th November 2020**

**5.2** Site Notice Expiry Date:- Not applicable

**26th November 2020**

## **6. Consultations**

### **External Consultees**

Consultation letters were sent to 39 local owner/occupiers on 18-09-19. The application was also advertised by way of site and press notices.

One response has been received which can be summarised as welcoming the application but raising concerns about potential highways impacts in terms of congestion and highway safety.

The applicant has provided 44 letters of support for the development proposals (these were submitted with the application rather than forming part of the Council's own public consultation). These include letters from the Chief Executive of the British Film Commission (BFC) and Film London, Marvel, Netflix and a host of other companies involved in Television and Film production, a number of which are based in the London Borough of Hillingdon. There are also letters of support from the adjacent Guru Nanak Sikh Academy, GOALs, Hayes & Yeading FC, Hyatt Hotel, Skyex and AK Builders Merchants on Springfield Road. There are also letters of support from the Hillingdon Chamber of Commerce, Global Acedemy, Trinity Homeless Charity and MADE Entertainment Charity.

### **EXTERNAL CONSULTEES**

#### **GREATER LONDON AUTHORITY (GLA) (summary)**

Principle of development: The proposal is inappropriate development within the Green Belt. The applicant must undertake a thorough assessment of the harm to openness and any other harm; submit a more compelling Very Special Circumstances case; including a rigorous alternative site search and a more robust visual impact analysis, which considers longer range views with acceptable impact mitigation measures. As it stands, the application does not comply with Policy 7.16 of the London Plan, Policy G2 of the draft London Plan, and the NPPF (paragraphs 13 to 21).

Urban design and inclusive access: The applicant is required to submit CGI visuals and additional LVIA of the development in order to assess thoroughly impact upon the Green Belt. The proposed measures to address inclusive access must be secured.

Sustainable development: Carbon savings exceed targets set within the London Plan and draft London Plan and the proposed measures must be secured through conditions. Clarification is required related to cooling demand and overheating risk, and evidence that PV has been maximised. Concerns related to flooding and green infrastructure must be addressed.

Noise and air quality: Given the application site is located within an Air Quality Management Area, all suggested recommendations regarding mitigation measures must be secured through suitable conditions/s106 agreement.

Transport: The proposals do not comply with transport policies of the London Plan and draft London Plan; to rectify this more work is needed on Healthy Streets, trip generation and transport assessment, car and cycle parking and servicing / construction.

#### **Recommendation**

That Hillingdon Council, be advised that the application does not comply with the London Plan and draft London Plan, for the reasons set out in paragraph 41 of this report; but that the possible remedies set out in that paragraph could address these deficiencies. The application does not need

to be referred back to the Mayor if the Council resolves to refuse permission, but it must be referred back if the Council resolves to grant permission.

#### TRANSPORT FOR LONDON (TfL)

The draft London Plan was published on 29 November 2017 and sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. TfL expects all new planning applications to give material consideration to the policies set out within this document, noting that the decision-maker is to determine the balance of weight to be given to adopted and draft policies.

#### Site and Surroundings

The development site is located on vacant, designated Green Belt land at Springfield Road and is bounded by the Hayes Industrial Area, Hayes Gate Football Club, Minet Country Park and Springfield Road. Springfield Road connects to the A4020 Uxbridge Road, approximately 250m east of its junction with the TLRN (A312 The Parkway).

The Uxbridge Road is served by bus routes 207 and 407 during the day and overnight by the N207. Consequently, the site has a Public Transport Access Level (PTAL) of 2 on a scale of 0-6b, where 6b is highest.

#### Assessment of Development

##### Healthy Streets

The Transport Assessment (TA) is not in the required Healthy Streets format and therefore has not been prepared with regard to the Healthy Streets and Vision Zero agendas as set out within draft London Plan policy T2. Additionally no active travel mapping has been undertaken to assess walking and cycling conditions in the vicinity of the site.

Key routes to and from the nearest bus stops (including Coldharbour Lane, if these are expected to be used) should be assessed and evidence provided to support the claims being made by the application regarding the delivery of the Healthy Streets indicators.

In addition, the applicant is urged to investigate a potential new link across Yeading Brook and the canal, which could be undertaken to provide new pedestrian and cycle access linking the development with Southall station.

##### Vision Zero and Road Safety

Vision Zero is an approach to road safety which seeks to eliminate deaths and serious injury collisions. The Vision Zero approach is based on the fundamental conviction that loss of life and serious injuries are neither acceptable nor inevitable.

TfL is committed to the Mayor's Transport Strategy (MTS) objective to achieve Vision Zero on all London streets by 2041. The Vision Zero approach is a shift in the emphasis towards a proactive approach of targeting road danger reduction, as opposed to tackling historic casualty trends.

As stated above, there has been no meaningful consideration of the Healthy Streets and Vision Zero agendas which is contrary to draft London Plan Policy T2. This must be rectified and demonstration provided that the increased activity associated with the proposals does not worsen road safety and degrade the measures proposed and introduced by the recent LB Hillingdon traffic calming scheme.

One of the proposed zebra crossings associated with the LBH scheme is located adjacent to one of the site entrances which is not ideal, as there is presumably an existing demand and problem being addressed by the intervention. Some indication of existing pedestrian and cycle flows should be

provided together with a demonstration that adequate mitigation is proposed to improve road safety on Beaconsfield Road.

This is a concern given the regular existing HGV movements on the road and the high traffic flows and demand associated with the Guru Nanak Sikh Academy which we understand has plans to expand its operations.

#### Trip Rates

Traffic surveys have been conducted at the three site entrances to establish the existing demand so that a trip rate can be calculated. This is welcomed. However,

- The surveys (24th-30th September 2018) were not undertaken when overspill parking was required and therefore does not represent the worst case as indicated in the TA.
- The survey data has been consolidated and presented for the whole site, it should also be provided for individual entrance is required to see the relative demands and movements.
- There is insufficient labelling and information to understand what traffic data is being presented in Appendix C (1 or 7 days worth of data for example).
- It is not possible to understand the methodology used to generate the trip rates from the presented data as the data summary does not match the presented data which is significantly higher.

Face value analysis of the presented data indicates that the maximum observed parking accumulation for the site would be 243 vehicles. Since the site has a physical capacity of around 90 spaces some explanation of how the site manages to function at all must be provided. The applicant is urged to also clarify whether this is a week or daily count total.

Far from being occasional, as claimed in the TA, overspill demand has occurred for 22 weeks of the year, which we would therefore regard as a normal occurrence. 7 of these weeks required more than one overspill location representing almost double the current levels of on-site car.

#### Traffic Impact

The presented data shows an additional 109 2-way movements in the AM peak (07:00-08:00) representing an 11% increase on the weekday average. TfL is not of the view that this is 'negligible', as the applicant has stated, and therefore raises concerns over the nature of the underlying survey data.

Dependent on the revised trip generation and totals, TfL may require an assessment of the Uxbridge Road junction to ensure that there are no strategic highway issues.

#### Data Collection

Given that the existing operations work on the basis of contracts and issued parking permits, there should be ample data available to illustrate the actual parking demand (including overspill) and generate a robust baseline. This can then be compared with the traffic survey data collected to establish how representative it is, and what the worst case levels of traffic to be used for assessment purposes are.

For these reasons outlined above, TfL does not consider the presented survey based trip rates to be robust and fit for purpose which undermines the rest of the Transport Assessment. In the first instance, the survey information must be re-provided in a more useable format and then complemented with additional data collection.

#### Cycle Parking

The provision of 16 long and 8 short stay cycle spaces is not considered compliant with draft London Plan policy T5 as it has been based on B8 sui generis land use. B1(c) is considered a more appropriate representation and an additional 16 long stay spaces should be provided to meet policy requirements.



## Car Parking

Paragraph 4.3.2 of the TA identifies a policy compliant level of parking to be 79 spaces, and then states that 87 will be provided. As no rationale or supporting evidence is presented to justify this level the parking, proposals do not comply with draft London Plan policy T6 and must be reduced.

While the capacity of the overspill car parks and the frequency of their use has been indicated, the actual volumes have not and so it is not possible to know the full overspill demand that has taken place over time. It is also noted that the current arrangements can be terminated by either side and therefore do not represent a permanent arrangement.

To resolve this situation the travel plan and car park management plan should be re-worked and resubmitted to avoid the need for overspill parking.

The current travel plan is aimed at the 8 full time members of staff and does nothing to address car-based demand or make any meaningful effort to promote sustainable travel for the development and as such is not acceptable.

Meaningful and effective objectives to reduce existing and eliminate all overspill parking must be put in place, and sustainable measures such as providing a shuttle service (similar to Shepperton Studios mentioned in the TA) should be secured in the s106.

The current car park management plan is a reactive process allowing clients to satisfy unrestrained car based demand by enabling clients to arrange overspill parking when required. In conjunction with the travel plan this must change to demonstrate how reducing levels of parking will be managed over time.

## Deliveries, servicing and construction

The Delivery and Servicing Plan (DSP) has covered refuse collections, but must also cover 'normal' day-to-day deliveries to the various stages, analysis of the existing situation and any issues encountered should inform the proposed arrangements.

The loading / unloading arrangements for the stages are not all clearly indicated on the swept path plans. These should include all vehicle manoeuvres required to reach any loading bays or unloading areas which must be clearly identified and marked. The applicant is also urged to note TfL's comments regarding Vision Zero.

The Construction plan needs more detail including an indicative programme of works. Guidance on the information required can be found at the TfL website.

## Mitigation

In addition, the applicant should note:

- Mayoral CIL (MCIL2) is chargeable at a rate of £60 per square metre
- Sustainable travel proposals are expected as part of the travel plan which should be secured as part of the s106

## Strategic summary / actions

At present the proposals do not comply with the London Plan, to rectify this more work is needed on Healthy Streets, trip generation and transport assessment, car & cycle parking and servicing/construction.

## HAYES TOWN PARTNERSHIP

I am writing on behalf of the Hayes Town Partnership in response to the public consultation on the application for the expansion of the West London Film Studios.

The Hayes Town Partnership is a multi-agency partnership set up by the Council to help regenerate the area. Besides the Council our members include Hillingdon Police, Hayes Town Business Forum, Hillingdon Chamber of Commerce, Uxbridge College (Hayes Campus) and Brunel University plus major employers and developers. This response is from the Partnership as a whole and does not purport to represent the corporate view of the Council or any of the other partners who may make their own submissions.

#### Principle of development on Green Belt site

Springfield Road is slightly outside the boundaries of Hayes Town Partnership but the future of the West London Film Studios is of such local significance that the Steering Group of the Partnership has agreed to submit comments in support of this application.

The presence of thriving film studios in Hayes is of benefit to the local economy and to the development of the cultural life of the area. We applaud the success of the British film industry in general and the West London Film Studios in particular. It is clear to us that the ongoing success has resulted in a pressing need for additional and purpose-built facilities and that in the absence of approval for the present proposals it is almost certain that the operators will be forced to relocate to a totally new site outside Hayes. That would be a loss to the area,

We are aware that the land which is proposed for development is designated as Green Belt and we are reluctant to see further loss of such sites in Hayes. However, we are of the view that this piece of land adds marginal benefit to the Green Belt and that it could be released subject to a number of mitigation measures outlined later in this response.

#### Environmental mitigation

In light of the proposed loss of an area of Green Belt we consider that the developers should enter into negotiations with the planning authority to carry out substantial mitigation measures to enhance the quality of the environment and the facilities offered by Minet Country Park. We do not have the knowledge or expertise to define these in any detail but the following possibilities might be considered:

- Restoration and improvement of the pond near to the cycle circuit
- Funding of environmental education for local schoolchildren in place of that previously given by the environmental charity A Rocha but discontinued due to loss of grant aid.
- Provision of information and interpretation boards
- Production of information leaflets to raise awareness of the Park and its environmental qualities amongst local residents.

#### Footpath improvements

In addition to the above it is considered that there would be great benefit to the users of the park and users of the cycle circuit if a new footpath could be provided on the eastern side of the circuit adjoining the boundary with the site of the proposed new studios. The current footpath crosses the cycle circuit and is a real source of danger to both walkers and cyclists.

The provision of a new path would not only remove this danger but it would provide the potential for a one mile walking circuit around the Park. This could be developed as part of the current programme of social prescribing being initiated by the National Health Service whereby General Practitioners can assist patients to get into exercise by providing information and encouragement to take up walking. The circuit could be suitably marked out with distance posts to enable patients to measure their progress and supplemented with guidance leaflets which could be given out by GPs.

To make the circuit useable by people with disabilities the paths leading from the north east corner of the Park would need to be provided with more gradual slopes. The potholes at the north western entrance would also need to be filled.

The proposals set out in this section of our response have arisen from discussions with the Friends of Minet Country Park and the Cycle Circuit Users' Group and have their support.

#### Employment

The current number of people directly employed by the Studios is relatively small but this will be increased if the development goes ahead. It is appreciated that filming companies bring their own staff but it is to be hoped that ways can be found to maximise the scope for the employment of local people. The availability of apprenticeships should be a priority.

#### Supply chain

Again, it is accepted that filming companies will have their own suppliers for issues such as set-building and lighting provision but it is considered that every opportunity should be taken to engage them with the local supply chain.

#### Community involvement

The presence of film studios in Hayes is largely unknown by the local community but it is good to see that there are links developing with Uxbridge College and the Global Academy. MADE in Hayes is already supported by the Studios and that can be further developed as can links with the Central Research Laboratory at the Old Vinyl Factory. The construction of new facilities will provide the opportunity to enhance all of these links and to bring in the wider community by means of open days and other initiatives.

#### Conclusion

As stated in the opening comments the Partnership supports this application subject to the provisos we have outlined and if planning permission is granted it will be more than willing to work with the West London Film Studios to take forward the proposals and suggestions set out in this response.

#### NATURAL ENGLAND

Natural England has no comments to make on this application.

#### THAMES WATER

##### Waste Comments

With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website:

<https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewater-services>

Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

As you are redeveloping a site, there may be public sewers crossing or close to your development. If you discover a sewer, it's important that you minimise the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes:

<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>.

We would expect the developer to demonstrate what measures will be undertaken to minimise

groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission:

"A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing [wwriskmanagement@thameswater.co.uk](mailto:wwriskmanagement@thameswater.co.uk). Application forms should be completed on line via [www.thameswater.co.uk](http://www.thameswater.co.uk). Please refer to the Wholesale; Business customers; Groundwater discharges section.

Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

#### Water Comments

With regard to water supply, this comes within the area covered by the Affinity Water Company. For your information the address to write to is - Affinity Water Company The Hub, Tamblin Way, Hatfield, Herts, AL10 9EZ - Tel - 0845 782 3333.

#### GREATER LONDON ARCHAEOLOGICAL ADVISORY SERVICE (GLAAS)

Recommend No Archaeological Requirement.

#### METROPOLITAN POLICE

I do not object to this proposal. I request a planning condition is adhered to it that the site achieved Secured By Design accreditation. This will ensure that appropriate physical security is installed on the site.

#### CADENT

Note that there are gas pipelines and associated equipment in the vicinity and the consultation has been referred to the Cadent Pipelines Team.

#### INITIAL COMMENTS

Objection - Developers planning to build alongside high pressure pipelines should be aware that there are 3 factors that are relevant: The pipeline easement - these are negotiated legal entitlements between Cadent Gas and the landowner and allow Cadent Gas to operate and maintain pipelines within the easement strip. Easement strips may vary in width typically between 6 and 25 metres depending on the diameter and pressure of the pipeline. The building proximity distance - this is a separation distance recommended by the Institute of Gas Engineers and Managers pipeline design code (TD1) which a pipeline industry recognised standard to reduce the hazard to individuals living in proximity to the pipeline. The separation distance varies depending on the pipeline pressure and design (wall thickness and diameter) and can vary between 3 m and 130 m. The land use planning distances - these are distances defined by the HSE to allow them to advise on the acceptability on new developments next to the pipeline and are controlled through the HSE's land use planning Advice for Developments near Hazardous Installations process. Further guidance on how these are

applied can be found on the HSE's website (please see attached). Unless written instructions are provided by Cadent, Cadent would want the pipeline easement to be maintained as Cadent would want to continue to have access for pipeline operation and maintenance purposes. Ideally Cadent would also want the building proximity distance to be maintained as this is a recognised safe distance for high pressure pipelines.

Officer comment: The objection took the applicant and planning team by surprise as the depth of the pipeline, its location near the road edge (re: Not close to proposed buildings) and a pre-application discussions the applicant had undertaken all suggested an objection was unlikely. Nonetheless the applicant's agent and Cadent Gas then discussed the objection and the applicant confirmed that they would 'remove the planting from and relocate the substation out of the easement and that any crossover relating to a new access into the site will be reinforced to the required standards set out in the documentation'.

Revised Comments: Cadent gas then withdrew the objection stating 'From the points stated within your email and confirmation that relevant crossing points will be to required standards then I am happy to withdraw the objection.'

Additional Officer Comment: Cadent Gas has not requested any planning conditions, as they will secure confirmation through a property agreement with the applicant to ensure they are satisfied the development will not place any risk on their pipeline. Nonetheless it is important that the site landscaping the planning team subsequently agrees matches the details of any property agreement separately agreed with Cadent Gas, as such the landscaping condition does have a reference to the applicant providing details of any mitigation required to satisfy Cadent Gas.

### **Internal Consultees**

#### **AIR QUALITY OFFICER**

The proposed development is located within the Ossie Garden Focus Area, producing traffic emissions which will add to current high ambient annual mean values and exceedances of nitrogen dioxide in this sensitive area. For a 'Standard Day', the project's Transport Consultant has calculated that the development will generate 177 Annual Average Daily Traffic (AADT) flows. For the 'Busiest Day', the proposed development will add 323 AADT to the local network.

Assuming a 'Standard Day', the proposal originates transport emissions at an equivalent damage cost of £111,950 for a standard day scenario. This is an underestimation of the total emissions as it does not account for the busiest days occurring throughout the year.

LBH requires new developments to incorporate air quality positive design measures from the outset and suitable mitigation measures to reduce pollution, especially in areas where the air quality is already poor (LBH Air Quality Local Action Plan 2019- 2024), namely Focus Areas. Furthermore, policy DMEI 14 of the emerging London Borough of Hillingdon Local Plan (part 2), requires active contribution towards the continued improvement of air quality, especially within the Air Quality Management Area.

In addition, the London Plan Intent to Publish version (December 2019) requires development to be air quality positive specially within focus areas, actively contributing to reduce pollutant emissions to the atmosphere.

A Travel Plan is to be submitted and delivered with targets of reducing traffic by at least 10% achieved, secured by a bond. In this context, a discount of 10% of the total damage cost has been applied. Finally, a further 5% discount was applied to account for likely emission reductions (non-quantifiable) associated with implementation of cycle parking. Should these reductions not be agreed with LBH, the total damage cost remains.

Assuming the above targets are accepted and achieved (to be secured via a bond of the vale subtracted), the remaining emissions need to be offset to actively improve air quality. Therefore, a section 106 agreement with the LAP of £95,158 is to be paid to contribute to Hillingdon to deliver its air quality local action plan and or implement specific measures on/along the road network affected by the proposal that reduce vehicle emissions and or reduce human exposure to pollution levels.

In addition, an Air Quality condition is required to develop and implement a Low Emission Strategy.

#### ACCESS OFFICER

I have considered the detail of this planning application and have no accessibility concerns about this proposal. However, the following informative should be attached to any grant of planning permission:

The Equality Act 2010 seeks to protect people accessing goods, facilities and services from discrimination on the basis of a 'protected characteristic', which includes those with a disability. As part of the Act, service providers are obliged to improve access to and within the structure of their building, particularly in situations where reasonable adjustment can be incorporated with relative ease. The Act states that service providers should think ahead to take steps to address barriers that impede disabled people.

All facilities, to include stage, performance and changing/shower areas, should therefore be fully accessible to BS 8300:2018, to allow equal participation by everyone, including wheelchair users.

#### CONTAMINATED LAND OFFICER

Historical mapping (from 1914) indicates the site was previously occupied by a former brick works, with evidence of, relatively small open clay pit workings shown within the area of the works. The mapping also indicates the open workings were subsequently in-filled. It is possible the infill materials may have comprised brick, kiln ash and other waste materials from the works.

The industry profiles for brickworks identify various ancillary activities, associated with brick manufacturing processes, and which may have caused contaminants to be present on the site, such activities include, but are not limited to: kiln construction, operation and refurbishment, engineering workshops; maintenance areas for plant and machinery; fuel storage facilities, including underground and above ground fuel tanks and supply lines.

Other contaminants which may also be present include asbestos building products and insulation materials used as part of the construction of the buildings and kilns, and which may have been disposed of on site.

The historical maps also indicate a track or possible haul road which may have been associated with the provision of vehicular access, from Springfield Road, to the former large scale infilling operations which were in progress on land immediately adjacent to the site.

The site is currently situated within a 250m radius landfill gas buffer zone which is associated with a possible risk of landfill gas emissions/migration from the above mentioned former tipping operations

It is therefore considered appropriate for a suitably phased approach to be adopted, to assess the site for contamination in accordance with recognised guidance and procedures, e.g. Model Procedures for the Management of Land Contamination (CLR11), and thereby assess the risks associated with any contaminants that may be identified at the site.

A condition is recommended for inclusion, in order to assess and address land conditions at the subject site.

## HIGHWAYS OFFICER

Springfield Road is an adopted public highway leading off the busy A4020 Uxbridge Road, it benefits from a 30 mph speed limit, street lighting and footways on both sides of the road. Along the southbound carriageway that borders the site, there is a mix of single yellow lines operational Monday to Friday 07:00 to 09:00 and 14:30 to 16:30 hours, double yellow lines and no parking restrictions at all. On the opposite side of the road there are double yellow lines only.

Springfield Road provides access to a range of uses including a hotel, a small retail park, wholesale retailers, small medium enterprises as well as Minet Country Park open space, the Guru Nanak Sikh Academy, Goals 5-a-side football pitches and Hayes and Yeading Football Club. The road is characterised by heavy good vehicles making deliveries/parking on-street, cars parked on-street and school traffic generated by the Sikh Academy. The developer has undertaken traffic counts in the vicinity of the application site which show that traffic flows peak in the morning 07:00 to 08:00 and afternoons 15:00 to 16:00 hours, these times correspond with pick up/drop off times at the Sikh Academy.

Transport for London use a system called PTAL (Public Transport Accessibility Level) to measure access the public transport network. PTAL assesses walk times to the nearest public transport location taking into account service frequency. The location is then scored between 0 and 6b where 0 is the worst and 6b the best. According to the Transport for London WebCAT service the application site has a PTAL ranking of 2 indicating access to public transport is poor compared to London as a whole. This suggests that there will be a strong reliance on the private car for trip making.

The proposed development would serve as an extension to the nearby West London Film Studio with almost identical operations and facilities. It would have 5 stages and employ 6 members of staff full time and 3 members of staff part time. The new development would have 87 on-site car parking spaces. However, the developer points out that in practice only 4 of the 5 stages could ever be in use at any one time.

The existing West London Film Studios provide a useful comparison for assessing the transport impacts of the proposed development. Compared to the existing building, the new development would have a slightly higher ratio of on-site car parking spaces to area of floors space. Ten percent of car parking spaces, 9 in total, would be wheelchair accessible which conforms to policy DMT 6 of the London Borough of Hillingdon, Local Plan Part 2 - Development Management Policies: October 2015. Five car parking spaces would have active electric vehicle charging points and a further 14 would have passive electric vehicle charging point infrastructure. The amount of electric vehicle car parking spaces to be provided is considered insufficient taking into account the targets for increasing electric vehicle use. Highway Authority require that 17 car parking spaces should have active electric vehicle charging points with the remainder having passive electric vehicle charging point infrastructure. The electric vehicle charging point standards in policy DMT 6 of the London Borough of Hillingdon, Local Plan Part 2 - Development Management Policies: October 2015 are minimum figures.

It is not clear from the planning application how many motorcycle, scooter and moped parking spaces will be provided, policy DMT 6 of the London Borough of Hillingdon, Local Plan Part 2 - Development Management Policies: October 2015 requires that these should be provided at the rate of 5% of car parking spaces. Any planning permission should include be subject a suitably worded condition to ensure that motorcycle parking is provided.

The developer proposes to provide 16 secure and covered long stay cycle spaces and 8 short stay cycle spaces near the entrance to the site; this is considered sufficient though the developer should

make provision for increasing this number in response to demand.

As mentioned above the proposed development would employ 6 full time and 3 part time members of staff, however when filming is taking place and 4 of the 5 stages are in use, the number of people working at the development would be many more. Based on information obtained from the existing West London Film Studios, The busiest time is when production and filming is taking place, there could then be up to 50 external staff working on each stage. However, when sets are being constructed, the number of external staff working at each stage is no more than 25 people.

To determine the number of trips the new development would generate, the developer has undertaken traffic surveys at the existing West London Film Studios. These were carried out at the peak times mentioned above. At the time of these surveys 4 of the 5 stages were being rented out, 2 were at the construction stage, 2 at the production and filming stage. This is considered representative but the results can not be considered a worst case scenario, this would be when all 4 stages are being used for production and filming. The result of these surveys has been used to forecast the number of trips that the proposed film studios would generate. The developer reports that the development would generate 15 two-way vehicle trips in the AM peak and 14 two-way trips in the PM peak. This volume of traffic represents only a small increase over and above the existing flows along Springfield Road. The developer highlights that vehicle trips are spread across the day and therefore there is no significant conflict with school traffic.

To accompany the planning application the developer has submitted a Travel Plan, this has been reviewed and is considered lacking; the bulk of the document is merely a summary of the sustainable travel options available locally for staff and visitors to use. Aside from giving each employee a 'Travel Information Pack' the Travel Plan contains little that would really incentivise sustainable travel behaviour. Nevertheless shower, changing room facilities and lockers will be provided and there is a commitment to participate in travel awareness events such as 'Green Transport Week' and 'Lift Share Week'. A Travel Plan coordinator will also be nominated.

Wherever a Travel Plan is required as part of a planning permission, the Highway Authority require the developer to provide a £20,000 bond as surety that the Travel Plan will be implemented. If the Travel Plan fails to meet its targets, then the Council will use this bond itself to deliver the Travel Plan. This £20,000 bond should be secured by way of a S106 agreement.

Whilst filming and production does not take place every day, the additional vehicular trips need to be catered for not least the demand for extra car parking spaces. In response a Car Parking Management Plan has been prepared and submitted alongside the planning application. This proposes that car parking at the new development would be managed along similar lines to the existing West London Film Studios. Each week an allocation plan of on-site parking will be prepared. Whenever a production company books a stage, the contract will set out how many car parking spaces/permits they would be allocated.

The traffic generated by the proposed development would generate additional demand for road space along Springfield Road which is already exceeding capacity evident by vehicles queuing at the Uxbridge Road junction. So that the development would be acceptable in highway terms a s.106 payment of £110,000 is required as a contribution towards a project that will transform Springfield Road from an unplanned road sometimes disfunctional highway to a managed and efficient access road serving a range of uses. This project will provide a shared use footway along the length of Springfield Road for cyclist and pedestrians to use. This will include facilities for pedestrians and cyclists as they cross the numerous access roads. The current parking and delivery regime will be reviewed and remodelled to remove injudicious parking and allow deliveries and servicing to take place without impeding the free flow of traffic or presenting a risk to road safety. New street lighting will be provided and the carriageway resurfaced and remarked in response to the improvements delivered. The scheme will include the provision of street trees and new benches so that the road is



characterised by the ten Healthy Streets indicators. Springfield Road will form part of a route linking the Uxbridge Road at the Borough boundary with Hayes town centre via Minet Country Park and Coldharbour Lane.

#### WASTE STRATEGY OFFICER

Satisfactory for waste and recycling requirements.

#### TREES AND LANDSCAPING OFFICER

This site is occupied by an area of unmanaged grassland situated on the west side of Springfield Road. The square plot lies to the south of an industrial estate and to the east of Minet Country Park's cycle track. Soft landscaping will incorporate 55 No. broadleaf native species, 1869 No. hedgerow plants 389 No. ornamental shrubs and 96 No. evergreen climbers. This will result in a net gain of woody species on this site which will benefit biodiversity, together with the sedum living roof. The land to the south is also unmanaged grassland with a small building in the south-east corner. There are no trees, TPO's or Conservation Area designations affecting the site. The site forms part of a proposed extension to Yeading Brook and Minet country Park SINC (Borough Grade I) The plot lies within the Green Belt, a designation which aims to retain openness, prevent urban sprawl and only permits development in special circumstances.

No trees will be affected by the development. A botanical survey, by Tyler Grange, concludes that this is species poor semi-improved grassland that has colonised formerly developed land. Ecological recommendations include the provision of green roofs, boundary planting to include selected native species (which are known to be of value to wildlife) and a financial contribution to the Minet Country Park SINC. The proposal will result in the construction of a large shed centred on the site with service roads, access and car parking (for 87 cars) around the north south and west boundaries. There will be a stand alone building along the north boundary with a living green (sedum) roof and a narrow strip of native planting between the building and the north boundary. The landscape scheme is supported by a (Soft) Landscape Specification and a Landscape Management Plan.

Clarification is required about how the hedge along the northern boundary can be managed and maintained, sandwiched between the building and boundary fence? Details of Green Blue Urban tree support systems have been submitted, however, it is not clear where these systems will be provided on site. Will they be used for all trees or only in selected locations? No details have been submitted about hard landscape details, such as: surfacing materials, boundaries, street furniture or external lighting? The landscape strip along the front boundary is too narrow to support a worthwhile landscape buffer. If car park spaces can be sacrificed the car parks along the south and east boundaries should be interspersed with additional soft landscape. In accordance with the London Plan, the Urban Greening Factor should be applied to the scheme (by the developer) in order to quantify the proposed green infrastructure, SUDs and wider environmental benefits offered by the scheme.

#### Recommendation

This assessment does not consider whether there are special circumstances to justify the development within the Green Belt. While there is a net gain of native trees and hedgerows, the proposed green infrastructure is too thin and will not mitigate the effect of the proposed built development. This proposal fails to provide a robust landscape proposal in relation to the impact of the development and is, therefore contrary to saved policy BE38.

#### Case Officer's comments

These comments were provided to the applicant who responded with further information in relation

to Landscape considerations (document ref: 11842\_R07\_RH\_MM dated 17th December).

## REVISED COMMENTS (NOVEMBER 2020)

Previous comments were submitted on 08/11/2019 and 13/01/2020.

No trees will be affected by the development.

A botanical survey, by Tyler Grange, concludes that this is species poor semi-improved grassland that has colonised formerly developed land. The report concludes that the site is of limited ecological value.

Ecological recommendations include the provision of green roofs, boundary planting to include selected native species (which are known to be of value to wildlife) and a financial contribution to the Minet Country Park SINC.

The proposal will result in the construction of a large shed centred on the site with service roads, access and car parking (for 87 cars) around the north south and west boundaries.

The amended scheme has removed a stand-alone building along the north boundary with a living green (sedum) roof and replaced it with a 20 metre wide soft landscaped buffer.

Soft landscaping will incorporate 68No. broadleaf native trees (up from 55), mixed native hedgerows (1974No. species) around the site perimeter, 1855No. mixed native scrub species and 431No. ornamental shrubs interspersed among the parking areas. This will result in a significant net gain of woody species on this site which will benefit biodiversity. The 20m landscaped buffer along the west boundary will provide a more significant landscape / environmental enhancement than the previously proposed sedum roof.

The landscape scheme is supported by a (Soft) Landscape Specification, ref.11842\_R06a and a Landscape Management Plan, ref 11842\_R05b. (The revised management still refer 'green roof development' although it appears that the green roof element no longer forms a part of the proposal?)

Details of Green Blue Urban tree support systems have been submitted. This detail will ensure that a suitable area of topsoil is available under the hard landscaped areas to support tree growth and long term sustainability.

A lighting report confirms 4 metre high lighting columns will be installed, with hooded luminaires and 4000K LED's. The lighting specification has been considered to be non-obtrusive, non-polluting and prevent glare.

Other hard landscape details, such as: surfacing materials, boundary security have yet to be proposed.

A landscape, visual and green belt appraisal has been prepared by Tyler Grange, in accordance with 'Guidelines for Landscape and Visual Impact Assessment', Landscape institute and Institute of environmental Management and Assessment, 3rd edition, 2013, and 'An Approach to Landscape Character Assessment', Natural England, 2018

## RECOMMENDATION

The current proposal incorporates additional soft landscape details which will provide significant ecological enhancement and a substantial landscape buffer with the adjacent Minet Park.

In accordance with the London Plan, the Urban Greening Factor should be applied to the scheme (by the developer) in order to quantify the proposed green infrastructure, SUDs and wider environmental benefits offered by the scheme.

This amended soft landscape proposals are comprehensive and provide a robust landscape proposal which seek to address the impact of the development. There are no landscape objections, subject to the outstanding impact on Green Belt considerations.

If you are minded to approve this proposal please add conditions COM9 (parts 1,2,4, 5 and 6).

#### URBAN DESIGN OFFICER

The application seeks permission for an extension to the West London Film Studios. This will involve the construction of new sound stages, workshops and office accommodation, entrance structures and reception and security offices and the creation of new vehicular / pedestrian accesses from Springfield Road, with associated car parking, landscaping and ecological enhancements.

The site comprises an area of 'scrubland' which lies to the west of Springfield Road and is situated within the Metropolitan Green Belt. Directly to the north and east of the site is the Hayes Industrial Area which is characterised by a mix of large industrial, commercial, office units, associated storage units and car parking etc. The buildings are functional in appearance and reflect their intended uses and are of no particular note.

The proposed studios and ancillary buildings would sit adjacent to light industrial units to the north and across the road to the west and would appear as a continuation of the Hayes Industrial Area. The proposed buildings would be of a better quality than many of the existing buildings within the estate and would fit in with the established industrial character of the area.

In design terms there would be no objection to the proposals, however, it is understood that the proposal conflict with Green Belt policies. If a special case can be made for the film studio expansion then some of the harm could be mitigated against with the introduction of more planting to the site and the use of green walls and roofs etc.

#### SUSTAINABILITY OFFICER

##### Energy

I have no objections to the proposed development however the information submitted is not detailed enough to base detailed designs on. Further work is necessary to provide the level of information that will provide certainty over delivery of the final energy proposals to ensure carbon reduction targets (35% from building regulations) can be met. The following condition is therefore necessary:

##### Condition

Prior to above ground works, a detailed energy assessment shall be submitted to and approved in writing by the Local Planning Authority. The assessment shall provide:

- 1 - Full baseline information on the regulated energy demand (in kgCO<sub>2</sub> and kWhr)
- 2 - full details of the energy efficiency measures to be included within the development to achieve the London Plan 'be clean' energy requirements and how these will impact the baseline [1] and be monitored to ensure their efficacy.
- 3 - full details and specifications of the air source heat pumps in accordance with the outline energy strategy (MLM, 7134640-MLM-ZZ-XX-RP-SU-0001) and how they will impact on the baseline [1].

The development must proceed in accordance with the approved assessment.

##### Reason

To ensure the development contributes to a reduction in CO<sub>2</sub> in accordance with London Plan Policy 5.2

#### ECOLOGY OFFICER

##### Summary

I have no objections to the proposed development subject to an ecological enhancement condition.

## Observations

The previous ecology report suggested that the extension to an existing SINC onto the proposed site was not appropriate. The contention was that the site offers little value and therefore should not be a SINC.

It is not clear if this position was presented through the review of designations during the Local Plan Part 2 development process. In any event, this position was not supported by the Council and the site is now designated a SINC (despite the amended note suggesting it is still just 'proposed'). Consequently, the site is regarded as having features of ecological merit regardless of the general conclusion in the report that the site is of little value.

The policy intention is to resist the development of SINC's however there are two mitigating factors in this instance:

- Firstly, the site is not in public ownership and therefore there is nothing stopping the landowner from clearing the site outside of the planning process (assuming correct protocols are followed to avoid a wildlife crime).
- Secondly, the site although having some merit, is essentially a derelict site with ruderal vegetation. This is not of 'no importance' or even the 'low value' assigned by the applicant but it is not exactly diverse habitat contributing to the wider SINC.

It would not be acceptable to continue with development of the site without any recourse to mitigation. However, it is noted that an extensive 20m buffer is now to be planted at the north western edge of the site. Assuming this is to be planted and maintained as an ecological buffer (as well as for landscaping and visual impact reasons) then there is the potential for this to more than offset the harm of the rest of the site; this woodland buffer, with other features of ecological importance could be a positive addition to the SINC. Furthermore, features within the built element of the scheme could provide additional ecological value providing a diverse opportunity for biodiversity.

The following condition is therefore required:

### Condition

Prior to above ground works, a plan for the enhancement of biodiversity shall be submitted to and approved in writing by the Local Planning Authority. The plan shall detail the measures to be incorporated within the 'buffer zone' (north western boundary) and shall include features such as logpiles, artificial refugia, bat and bird boxes. This area should also incorporate at least two waterbodies (i.e. ponds) to provide further diversification of habitat unless otherwise agreed in writing with the Local Planning Authority. The plan shall also identify the inclusion of bat and bird boxes within built structure of the development. Finally, the plan shall be accompanied by a maintenance strategy that demonstrate the 'buffer zone' shall be managed in perpetuity for its ecological value. The development must proceed in accordance with the enhancement plan and maintenance strategy.

### Reason

To ensure the development contributes to the provision of biodiversity value in accordance with Policy EM7 of the Local Plan.

## ENVIRONMENTAL PROTECTION UNIT

I have read through the submitted documents and in theory I have no objections to the proposed large extension. Recommendations for external lighting are cited in the External Lighting Statement and are deemed satisfactory. The applicant has not mentioned any fixed external plant/equipment such as air handling equipment in the proposal. The Opening Hours are from 06:00 to 23:00,

therefore in the event of the premises being in use in the late evening or early morning hours and the resulting activities result in disturbance then specific noise nuisance legislation will be used to address to resolve the problem. I have noted that the proposed development is a business/ trade area.

## FLOOD AND WATER MANAGEMENT

Objection - The application should be refused as the submitted information has not demonstrated that a Sustainable Drainage System can be implemented within the current site layout. Particularly, limited space has been allocated within the proposed site layout for the provision of green infrastructure that can be integrated into the drainage strategy. This is of particular concern given the sites current designation as a SINC in in the green belt. See more detailed observations below.

### Observations

A Drainage Strategy (MLM Consulting Engineers Limited report dated 30th August 2019) has been submitted to support the application.

### Flood Risk

The site is approximately 1.35 hectares in area, is currently greenfield land and lies in Flood Zone 1. There are parts of the site that are identified to be at low risk of surface water flooding (1% annual exceedance probability to 0.1% annual exceedance probability), however this is related to the embankment along the western boundary preventing surface water leaving the site. This is consistent with the topographic survey contained in the Drainage Strategy which states that land falls from Springfield Road to the west. While the proposed drainage strategy is likely to minimise flooding from this source, the low risk demonstrates the need to consider exceedance flow routes in the drainage strategy.

### Surface Water Management

The development includes a large film studio building in the centre of the site with a smaller workshop building along the western site boundary. There are areas of associated parking and access roads around the perimeter of the proposed studio. The proposed drainage strategy is to attenuate surface water flows and create a new connection to the Thames Water surface water sewer in Springfield Road. The Drainage Strategy has considered the SuDS hierarchy and has discounted the potential to drain via infiltration or to a watercourse. While the likelihood to discharge all collected surface water to the ground via infiltration is low, the possibility for partial infiltration should be retained as a consideration to detailed design to maximise the opportunities to reduce the volume of surface water entering the sewer network.

It is noted that the Drainage Strategy includes a ground investigation for a site in Clapham that is not relevant to the site under assessment. If a site investigation has been completed for the site, the corresponding report should be submitted to the Council for review.

The drainage strategy has not considered the potential for water reuse within the site in line with local and regional planning policies. The expectations of the Council for major applications are stated in the Sustainability Statement (MLM Consulting report dated August 2019), however this has not been addressed further in the documentation. Policy EM1 of the Hillingdon Local Plan Part 1 requires major developments to consider the whole water cycle impact of the proposals, including water consumption. Further, emerging Local Plan Part 2 Policy DME1 10 (G) requires all new development proposals to include the collection and reuse of rainwater. The current proposals are therefore not in line with local planning policy. A combination of permeable sub-base and below-ground attenuation crates is proposed for the site, with quantities of storage quoted as approximately 940m<sup>3</sup> and 1280m<sup>3</sup> respectively.

While the Drainage Strategy has considered the potential implementation of a range of SuDS

measures, many of the green infrastructure measures that would provide multifunctional benefits have been discounted at this stage of design. While it is welcomed that a green roof is proposed on the roof of the workshop, this is only a small proportion of the site area compared to the other impermeable surfaces.

The NPPF (2019) includes the requirement for SuDS in major developments to, where possible, provide multifunctional benefits. There are extremely limited benefits, other than controlling surface water runoff leaving the site, from the currently proposed drainage strategy. Given the location of the site in the green belt, on greenfield land and designated as a SINC, the drainage strategy should be integrated into a comprehensive landscaping plan and should incorporate green infrastructure SuDS wherever possible. This was communicated in pre-application advice to the applicant.

The advice noted that sufficient green infrastructure should be embedded in the drainage strategy and included on the site to screen any building from visual harm as well as reducing the urban heat island effect that will reduce the need for excessive cooling. These multifunctional benefits have not been addressed in the submitted drainage strategy.

Even though the detailed design of specific drainage elements may be conditioned post-planning, the drainage strategy at this stage should incorporate as many sustainable elements as possible so that these can be incorporated into the detailed design of the other elements (e.g. detailed landscaping and highway design). The current design is contrary to Part F of emerging Local Plan Part 2 Policy DMEI 10.

Case Officer's comments:

These comments were provided to the applicant who responded with further information in relation to Flood and Water Management considerations.

#### FLOOD AND WATER MANAGEMENT - REVISED COMMENTS

The applicant has submitted additional information in the form of a letter (MLM Consultants reference 6100501- MLM-ZZ-XX-RP-C-0002 dated December 2019) that alleviates my main concerns with the proposals. The additional green space improvements to the Country Park would provide local habitat enhancements and contribute to mitigating the loss of green infrastructure.

Should you be minded to approve the application, there are aspects that still need to be secured by way of a water management condition to ensure that the detailed design provides the most sustainable method of draining the site.

#### REVISED COMMENTS (NOVEMBER 2020)

No change to previous comments. The removal of the workshop has added the potential for above ground SuDS such as swales, rain gardens or ponds to be incorporated into the landscaping design for this area. This is referenced in the updated drainage strategy and should be secured by way of a condition through to detailed design.

#### PLANNING POLICY OFFICER

##### Principle of Development

All of the proposed development site is designated as Green Belt. The proposed development must therefore be assessed in accordance with the NPPF, London Plan policy 7.16, and Local Plan Part 2 policy DMEI 4 'Development on the Green Belt or Metropolitan Open Land' .

The use class of the proposed development is Sui Generis TV and Film Stages. As it does not fall within any of the exceptions outlined in paragraph 145 of the NPPF, the proposed development would be inappropriate development in the Green Belt, and it should therefore not be approved except in very special circumstances. The NPPF states that when considering any planning application, substantial weight should be given to any harm to the Green Belt and that very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and other harm resulting from the proposal, is clearly outweighed by other considerations. The applicant must therefore set out the very special circumstances they believe would outweigh the substantial harm to the Green Belt.

The second policy issue that will need to be addressed under national and emerging local planning policy is the potential harm to biodiversity given the site's emerging designation as a SINC. Proposals that result in significant harm to biodiversity which cannot be avoided, mitigated, or, as a last resort, compensated, will normally be refused.

#### Green Belt - Very Special Circumstances

The development site has been designated as Green Belt since the first Local Plan was produced in 1965 and has retained its designation through a recent review as part of the emerging Local Plan Part 2. The site has been assessed as meeting at least one of the five purposes of Green Belt which is to check the unrestricted sprawl of large built up areas. This area of Green Belt forms part of a larger ribbon that follows Yeading Brook and serves to separate parts of Yeading and Southall from Hayes. The Council acknowledges the information submitted by the applicant with regards to the Green Belt purposes of the site however, the Council is satisfied from its own review that the Green Belt boundary in this area of the borough has been appropriately defined.

#### a) Location and Need

The existing West London Film Studio (WLFS) building is located on Springfield Road in Hayes and is part of the Hayes Industrial Area Strategic Industrial Location (SIL). The proposal site is located slightly to the north of the existing site and on the opposite side of Springfield Road. It is located directly adjacent to the southern boundary of the SIL and is also adjacent to Minet Country Park to the west and the Goals Hayes football complex to the south.

The purpose of the proposed additional studio space on the application site is to cater for unmet demand on the current WLFS site. The applicant indicates that the current film stages are operating at 90% occupancy and that demand will continue to grow despite existing approved increases at the larger strategic studio sites just outside west London (Pinewood and Shepperton). WLFS is catering for a more independent, peripatetic client base whilst the major studios are linked to one client e.g. Pinewood will be used exclusively by Disney and Shepperton by Netflix. In addition, a Lambert Smith Hampton (LSH) 2018 report on the UK TV and Film Studios Market makes an assessment that there is a need for 1.6 to 1.9 million sq ft of new film studio floor space in the UK over the next 15 years. Only 0.8 million sq ft is identified as being in the pipeline and much of this is long term projects that may take many years to come on stream. The findings of the LSH report are supported by Film London Chief Executive, Adrian Wootton who in a quote provided to Council's economic regeneration team has stated that:

"Prior to the COVID pandemic, the UK screen industries were experiencing a period of unprecedented growth. Inward investment spend from major international productions topped £3bn in 2019. The spend on high-end TV production alone reached nearly £1.3bn - the highest figure since records began and a 51% increase on last year's figures..."

"..The main threats to long-term sustainability and to capitalizing on this growth, prior to the pandemic, have been around availability of studio and work space, and skills to meet the increased demand. And these challenges remain. Simply put, we need more studio space to accommodate rapidly increasing demand from domestic and international studios and streamers."

The success of streaming services during the COVID pandemic and need to keep refreshing content is anticipated to ensure that need for additional floorspace in the TV and film studio market will remain high as demonstrated by a recent deal signed for new studio space in the London Borough of Barking and Dagenham. West London Films Studios are the only such facility currently in the borough and offers the only opportunity for the local economy to benefit from such demand.

The location of the current WLFS as part of a wider West London studio cluster is also introduced as key to explaining the demand for additional studio space. Film London identity that approximately 75% of the existing TV and film industry is in London. Its traditional heartland is the western fringe of Greater London which is home to well established studios such as Pinewood, Leavesden and Shepperton. The location of the existing and proposed studios are located at the heart of the West London cluster allows them to capitalise on the infrastructure and skills that already support the success of the cluster as a whole. The applicant argues that if the studio is not able to expand in its existing location, it would be forced to look for premises outside of the borough and possibly outside of London to cater for the growing demand.

The last factor to consider is the need for the existing and proposed studios to be near one another. It is anticipated that once the second studio building is in operation that a large number of productions will work across both sites. TV and Film companies often require the use of more than one stage of varying sizes and the new studios will increase the flexibility that can be offered to such companies. The proximity of the studios will also allow projects to have crew from various departments (costume, make-up, art, etc) close by to all stages and will also faster turnaround of sets and a more efficient shoot. The applicant concludes that WLFS would not be able to attract the new productions its additional capacity is designed to accommodate unless the studio sites are able to operate in tandem with each other with crews continuously moving between the sites. The five-minute walk between the two studio buildings is considered that maximum that would still enable successful operation of multi-studio productions.

Based on all the information summarised above, it is considered that significant weight can be given to the need for the expansion of WLFS and the requirement for this to take place in close proximity to the existing studio site.

#### b) Alternative Sites/ Development costs

The next issue for consideration in terms of very special circumstances is the need for the expansion to take place on a Green Belt site. The current studios are on a brownfield site within an Strategic Industrial Location and the developer has been required to demonstrate through a sequential assessment that no alternative brownfield sites are available.

Evidence has been provided to try and demonstrate that the application site is the only suitable location for the proposed film studio development within a wider west London search area. To support this position, the applicants have provided a 'Land and Building Report' which has investigated the availability of development land or buildings which could accommodate a new studio of 75,000 - 100,000 sq ft. The search area included sites in LB Hillingdon, LB Ealing, LB Harrow, South Bucks, Spelthorne and Slough. It also covers in detail the industrial estate within which the current WLFS is located. It is noted that whilst the site assessment does cover a large number of industrial sites, it is not clear that this includes all designated and non-designated industrial sites in Hillingdon and surrounding boroughs or that alternative brownfield sites such as the former retail sites have been fully explored.

In terms of the availability report, nearly all of the sites and buildings listed are identified as unsuitable as they are not available for freehold purchase and/ or because the steel frame construction would cause acoustic issues in terms of noise transference. On the first matter the report identifies that the applicant requires a freehold site due to the investment required to adapt any such building into a film studio. This level of investment is not considered viable or cost-effective on a leasehold site,



primarily due to the high capital expenditure required and the time-limited nature of any lease. On the second issue of noise transference through steel frame construction, the report states that this is virtually impossible to limit through retrofitting.

However, as with any sequential assessment it is important to demonstrate flexibility and it is clear from the planning history on the current site of the West London Film Studio that the existing building was not a purpose built facility but has been operating successfully for a number of years. A short list of the most suitable sites would be expected together with a more detailed assessment of whether they could be adapted or redeveloped to meet the needs of the expanded film studio. There is also no detailed explanation of why all leasehold sites are discounted particularly when no further evidence has been presented on the likely terms of such leases. Consequently, the assessment is relatively high level and raises the concern that the position taken by the applicant is unrealistically inflexible given the nature of the industrial market in West London and the likelihood of a freehold brownfield site or an acoustically suitable building being available.

From the evidence submitted there are some sites near the WLFS which have been recently available and have not been pursued further by the applicant. These include the Hayes Data Centre, Glaze House and units at 180 Uxbridge Road. The availability reports rules out one of these sites in uses as a data centre as being economically unviable due to the high cost of the land. However, no detail is provided to explain in detail why this was considered unviable (comparative costings etc) or why the other sites weren't pursued further given in some respects, they would have been able to meet the applicant's requirements. T

Following a further meeting with the applicant they have submitted further evidence in relation to these sites as follows:

#### Glaze House

This was bought in March 2017 by Hermes Real Estate Investment Management (a well-known significant UK property fund) for £6.3m. The property is 1.8 acres reflecting £3.5m per acre. The existing property was immediately let to Express Reinforcements and a successful planning application to change the use from B8 to B1c, B2 & B8 made in November 2017. The existing building was wholly unsuitable for film studio purposes in respect of size, eaves height and the viability to redevelop was precluded by price as evidenced by Hermes reletting it as existing.

#### Hayes Data Centre

At the point of sale this building was still let for a further 3 years to Deutsche Bank AG and the investment sale was based on a rental of £2,646,040 per annum reflecting approximately £24.85 per sq ft on the total GIA or £44.54 per sq ft on the GIA excluding mezzanine floor.

None of the building was considered suitable for film studio purposes and the purchase price of £11m reflects £4.25m per acre. This pricing and the cost of reinstating any of the building to a beneficial use was prohibitive and continued data centre use is planned. The main 'warehouse' style building is 47,000 sq ft but has a mezzanine floor effectively halving the internal heights.

#### 180 Uxbridge Road (known as Hayes 180)

This is a 4 building speculative industrial/warehouse development by a major financial institution, AXA IM. The 2 larger buildings sit in the middle of the development, both smaller than WLFS requires and a combination of leasehold, too low an eaves height (10m minimum height to units 2-4) and a prime rent of £13.95 per sq ft provided too many compromises for such expense.

It is clear from these comments that as with the other sites investigated much of what is driving the applicant's comments on availability stems from costs. It is therefore useful that the application has submitted a development appraisal (November 2019) to demonstrate their case in terms of the higher build costs of a film studio when compared to a B8 warehouse. The appraisal seems to demonstrate that the cost of constructing a film studio is 3.5 times greater than that of an industrial

warehouse. The additional costs stem from higher prices for the building frame, external walls and upper floors which it is assumed are required to enable lighting rigs and sound proofing. There is also an additional cost for M&E which it is assumed is mechanical and electrical works which are not accounted for in the warehouse construction.

Unfortunately it is not possible for the Council to independently verify the scale of these additional costs but it does provide evidence in support of the principle which is accepted that due to the specialist requirements, the construction of a film studio is likely to be greater than a standard B8 warehouse. The applicant has indicated that given these additional costs it would not be viable for them to purchase or lease an existing commercial site. WLFS does not have the guaranteed end user of the larger studios such as Disney at Pinewood as it is seeking to provide studio space for independent, smaller scale productions. In addition, given the high upfront costs required to create studio floorspace, the applicant emphasises the importance of owning the site to ensure that this investment can be recouped over the longer term.

The 2018 Lambert Smith Hampton report referenced in section a) also adds some further context regarding the viability of potential brownfield sites. The report identifies that in locations such as West London where the logistics sector is prominent, sites that would be suitable for studio developments are being taken by this higher value sector limiting the availability of suitable sites for new studios, despite the evident strength of demand. In addition, the LSH report identifies that the uncertainty of income in the studio sector, with studios being rented on a short term basis by productions, can give new studio investments a relatively high risk profile making it more difficult for them to compete for sites which a logistics sector willing to take longer term leases. Furthermore, the LSH report shows that purpose-built film studios are able to secure significantly higher rents of approximately £50 per sq foot per year compare to less than £30 for re-purposed warehouses making the purpose-built option more sustainable to studio operators in the long term.

In summary, it is considered that there are alternative brownfield sites which would, in principle, be suitable for the purposes of expanding the WLFS. However, the evidence submitted by the applicant and set out in the 2018 LSH report has identified the unique characteristics of TV and film studio market that make it difficult for studio developers to access these sites. These include the increase construction costs due to sound proofing, increased floor to ceiling heights and strengthening of the building to hold light rigs. These factors, together with the higher risk profile of such developments in terms of future income, make it difficult for them to compete with the prominent industrial sector in West London of logistics. On this basis it is considered that the lack of suitable alternative brownfield sites can be given medium weight as a very special circumstance.

#### c) Potential Economic Benefits

An Economic Impact Appraisal has been submitted as part of the planning application. The key findings in terms of net job creation of the appraisal are as follows:

These estimates take into account the proportion of jobs that will be taken by people outside Hillingdon, the potential displacement of employment activity elsewhere, the proportion of employment that would have taken place anyway and multiplier effects on further economic activity (indirect and induced jobs).

The economic impact assessment identifies that the bulk of these jobs will be for production staff activity relating to the temporary use of the studios by production companies. Production companies bring a mixture of employed staff and self-employed contractors as well as utilising the services of local businesses. Once open, the studio itself will also employ a small number of employees directly. Taking all these factors into to account, the expansion of the studio would have a net benefit in terms of jobs in the local area and across wider London economy.

In terms of economic value to the local economy, it is estimated that the current WLFS contributes

£17.8 to £24 million of gross added value (GVA) to the local Hillingdon economy. The planned expansion is anticipated to contribute a further £17.7 to £23.3 million of GVA. The newly expanded WLFS will therefore contribute up to £47 million of GVA to the local Hillingdon economy. Undertaking the same calculation for the impact of an expanded WLFS on wider London economy the estimated combined figure is between £162.6 and £219.2 million.

These economic and employment benefits are significant to the local economy particularly given the recent challenges arising from the COVID19 pandemic and the need to capitalise on industries which continue to generate economic value. As discussed earlier, without expansion, it is likely that the studios would need to relocate away from the borough, and this would have a detrimental impact on the local economy in terms of economic value and employment opportunities. The potential to retain and enhance the economic benefits arising from an expanded WLFS should therefore be given significant weight as a very special circumstance.

#### d) Social Impacts

The proposed studio development will not have any direct social impacts and consequently such considerations cannot contribute to the demonstration of very special circumstances.

#### e) Impact on character and openness

Any new development should also seek to minimise its impact on the openness of the Green Belt taking into account the visual amenity and character of the surrounding Green Belt land. The proposed studio building is both large in scale and footprint and its impact on the surrounding Green Belt including Minet Country Park is a matter of concern. Amendments have been made to the scheme to introduce a 20-metre-deep landscape buffer to the western boundary of the site. The buffer is intended to soften the transition between the new studio building and Minet Country Park, limit the impact on the character and openness of the Green Belt as well as significantly enhancing the ecological value of the site. The building will also be clad in muted colours that are intended to reflect the trees and adjacent landscape.

The applicant concludes the location of the site at the urban fringe and adjacent commercial areas give it a low susceptibility to the proposed development despite its designation as Green Belt. The applicant states that the proposed development is contained within an area immediately adjacent to existing commercial development on Springfield Road to the north and east and the building line would not extend beyond that already established to the north. They conclude that when considered in relation to the context within which the site is situated the nature and scale of the existing development including that already within the Green Belt to the south, the proposals would result in a localised change that is in keeping with the urban edge and commercial development that is prevalent in the locality. This is despite the sound stages being taller than the adjacent development.

The most sensitive view is considered to be that to the west from Minet Country Park where it is concluded that the proposed ecological buffer will have the impact of filtering views into the site and soften the transition to this urban edge.

Whilst the Council does not support any of the points made by the applicant regarding the appropriateness of the Green Belt designation of the site, it is recognised that this particular Green Belt site is located on the urban fringe and provides the transition from a built up commercial area to the north and east of the parkland landscape of Minet Country Park to the west. It is also recognised that significant development has also already taken place on Green Belt areas to the south of the site providing a mix of sporting and educational facilities. As a result, it is recognised that the most important view of the site in terms of impact on character and openness is that from the west. It is agreed that the proposed provision of the 20-metre buffer planted with native trees and hedges on this boundary will have a significant impact on softening the visual impact from Minet Country Park. Accordingly, the impact on character and openness of the surrounding Green Belt is likely to be only slightly negative in this instance.

## Conclusion

Considering all the evidence submitted by the applicant, the potential very special circumstances have been weighted as follows:

- a) Need - medium significance
- b) Alternative sites/ Development costs - medium significance
- c) Economic impact - very significant
- d) Social impacts - N/A
- e) Impact on character and openness - slight negative significance

Thus on the basis of a combination of the high level of demand particularly in West London, the specific requirements of TV/ film studios and potential economic benefits of the scheme, particularly within the context of the COVID 18 pandemic, it is considered that very special circumstances justifying the development have been demonstrated in this instance. This is countered to some degree by the slight negative impact it is considered that the proposal will have on the overall character and openness of the surrounding Green Belt. However it is considered that this has been mitigated to a significant extent from the key view to the west, The combination of all these elements is considered key and presence of one on its own would not be enough to justify very special circumstances for development in this Green Belt location.

## ECONOMIC DEVELOPMENT OFFICER

From an economic development perspective, the application from the West London Film studios to expand its production capacity in Hillingdon is very much welcomed and supported.

The UK film and tv industry has over the last ten or so years seen unprecedented growth. The West London Film studios application needs to be considered in conjunction with this growth of the regional film and television sector.

### Sector growth

Since the introduction of film tax-relief incentives in 2006, which have been honoured and continued by successive governments Britain has become one of the world's movie centres. Tax Relief is now available at 25% for qualifying film production expenditure, regardless of budget,

Production spend in the UK has doubled since 2009, to a record £1.72bn on film alone in 2016.

In 2016/17, £582m of tax relief was granted to the UK film and television sector.

What has also accompanied the growth of the film sector is the growth of TV production due to the growth of 'streaming' services via Amazon, Netflix and Apple. Streaming services such as Amazon and Netflix accounted for a quarter of TV export sales in 2016/17 (£225m) and this share of the market is only likely to increase given the concentration of production facilities in the UK.

No country export more TV formats than the UK and PACT the organisation that represents the UK's independent TV production sector reported that in 2018 the TV exports business was worth more than £1.28bn. The UK's independent television production sector is stronger than ever, creating formats and content that are coveted by buyers the world over.

The film production sector has been reporting for several years that studio and film production facilities are fully booked. The West London Film studios in its discussions with the Council have consistently reported that, pre covid 19, the studios in Springfield Road are operating at full capacity and that they have had to turn down bookings on a regular basis.

It should be noted that the film and tv sector is not evenly distributed across the UK but the industry

has focused activity in studios in the London and West of London region.

#### Film studios

The expansion of the region's leading film studios has had a significant impact on film and tv production capacity and this has a bearing on the application from the West London film studios.

The larger studio complexes of Pinewood, Shepperton and Leavesden are synonymous with the production of blockbuster movies such as the James Bond, Star Wars and Harry Potter series.

These studios have become a destination of choice for Hollywood, with major studios making long-term commitments to the UK.

This commitment has seen Pinewood, Leavesden and Shepperton all expand capacity to meet the demand from the film sector. This commitment will have a long-term impact on the regions production sector.

The last two years has seen this expansion commitment from the Pinewood, Shepperton and Elstree studios rewarded with long term contracts.

In September 2019 it was announced that Disney productions, the film and TV giant behind the Star Wars, Marvel and Avatar movies will be leasing nearly all of Pinewoods expanded production capacity, some 20 stages plus other facilities in all.

This serves to provide Disney with a long-term dedicated UK base capable of handling their biggest films and equally the production capacity to deliver TV shows, which Disney will need to fill its new streaming service.

In July 2019 Netflix announced it was also taking a long-term lease on Shepperton Film Studios. As with Disney Netflix plan plan is to create a dedicated UK production hub, including 14 stages, workshops and office space. The deal, believed to be in place for 10 years, will see the Netflix production hub take up 435,000 square feet of the studios.

Leavesden the Warner Brothers owned studio base of the Harry Potter film series and the Harry Potter world visitor experience has a masterplan to expand facilities at the current 200-acre site. The plan is reportedly to create capacity to manage three 'blockbuster' movies per year, together with TV drama and independent productions.

Sky productions have also recently announced a major investment agreement with Elstree studios.

What is important to note is that the WLFS in the main serves the independent film and tv production sector. The investment in studios such as Pinewood by Disney and Shepperton by Netflix will benefit the production companies linked to Disney and Netflix but will not assist the independent production centre. The expansion of the WLFS capacity serves not only to expand the capacity of the studios to support independent film production but potentially serves to secure the future of film production in Hillingdon. The WLFS will create an anchor facility around which film support services will develop. There is also potential that in the long term the site adjacent to the Hyatt Plaza further down Springfield Road will expand to provide an apart hotel, which would be a perfect fit for the expanded studio provision.

#### Green belt

It is noted that both the expansion of the Pinewood and Shepperton studios was in land previously designated as green belt. The original application from Pinewood Studios was not approved but in summer 2014 the Secretary of state for Communities and local government allowed the studios appeal. The awarding of permission was supported by the government as it would 'address the

clear need for additional (studio) capacity in the UK'. At the time Pinewood welcomed the expansion as it would "secure future growth". This has been borne out by the recent Disney commitment.

The expansion of Shepperton studios granted in February 2019 again saw the existing studios expand into green belt. However, Spelthorne council took the view that harm to the green belt arising from the scheme was "clearly outweighed" by the proposal's economic benefits. Again, this decision to expand has secured a long-term commitment from Netflix.

#### Impact on the sector

Whilst the expansion of Pinewood, Shepperton and Leavesden will benefit the organisations who have secured the services of these studios, the recent events will have done little to reduce what a recent BBC report described as a chronic shortage of studio space from the independent film and TV sector.

A report from the land agents Lambert Smith Hampton estimated that there was demand for almost another 2million square feet of studio space.

What is important to note in relation to the application from West London Film studios is that the investment we are seeing in the film sector is long term. Given the scale of the commitment from key industry leads such as Disney and Netflix it is a sector that will continue to have significant impact on the regional and local economy for several decades.

#### West London film studios

The current studio set up in Springfield Road is thriving and the studios six stages are operating at near full capacity. Whilst the West London studios only have 99,000 sq ft of floor space the studio has an excellent reputation within the film industry, borne out by 'televisual magazine' rating West London Film Studios as one of UK's top ten studios in 2016. The studios have also recently produced some very highly acclaimed and in the case of Killing Eve award winning drama for BBC.

There has been a considerable amount of publicity and reporting into the value of the film and TV sector to the UK economy, which in 2017 was estimated to be some £17 billion.

The West London studios advise that the operation currently contributes £18-24m of economic value to the local economy and that the expansion will create between £18-23m of additional value once the studios capacity is extended. One indicator of the importance to the local economy of the West London studios is the number of letters of support from local companies who work with or benefit from an association with the studios.

The concentration of film studios and film production services in the West London area is to be welcomed. The studios permanent employees will be considerably boosted by the numbers of production crew that are required for each production. The WLFS studios predict that the expansion will create between 440-580 additional jobs.

By way of comparison, Shepperton studios secured its permission to expand on the economic benefits with a predicted 3,000 jobs being created once the expansion was complete. The projected employment figures from Shepperton serve to demonstrate the positive impact of the film sector on employment to local economies.

As with Pinewood and Shepperton studios securing the long-term future of the West London studios will support the growth of the specialist production and technical services that studios require. The creation of a West London sector is very much becoming a reality.

It is noted that jobs within the film sector are well paid; at least a third higher than employees in the

non creative sector. The current demand for skilled technicians will only continue to grow due to the expansion of the sector and likely to benefit residents living in the vicinity of this expansion.

What is also important to note is that the creative sector is one of the UK's growth sectors. The following are just some of the factors that are reportedly supporting this growth;

- tax incentives (for qualifying productions)
- exceptional calibre of UK based producers and writers
- London is the base to some of the world's leading visual/special effects companies.
- continued and growing appetite for English-language productions
- value of the £ against the US \$ and the Euro

There is a strong argument that as the UK leaves the European Union the UK's film and Television sector will have an ever more important role in supporting UK economic growth.

## Conclusions

An expanded West London film studios will be well placed to share in the projected future growth of the sector and in doing so provide local residents with well paid careers and job opportunities.

The supporting Economic impact assessment to the planning application from the WLFS details the economic value that the expanded WLFS will bring to the local economy. The investment in expanding the WLFS at this point in time is very welcome. The impact of covid 19 on Hillingdon's economy has been significant. Heathrow are currently reporting job losses at the airport of 16,000. This figure will be far greater when we take the impact of a decline in aviation into the wider Heathrow supply chain and support sector. The impact of covid on the aviation sector is also having a direct and adverse impact on employment in the hotel, transport and hospitality sectors. The positive impact that the film production has in terms of the hotel, transport and hospitality sectors is very much welcomed.

It is also worth noting that DWP in conjunction with Pinewood studios have in response to the covid crisis been running a training course for those made redundant in the aviation sector at Heathrow. The course is focused on careers in the film sector and serves to demonstrate that despite covid 19, the film sector is both confident of its future prospects and sees itself as requiring additional workers in the immediate future.

The expansion of the studios that granting the application brings is also significant in that it potentially serves to secure the future of film production in Hillingdon and paves the way for further investment in the infrastructure that supports film production.

## **7. MAIN PLANNING ISSUES**

### **7.01 The principle of the development**

Paragraph 133 of the NPPF (2019) states that the essential characteristics of Green Belts are their permanence and openness.

Paragraph 134 of the NPPF (2019) notes the Green Belt serves 5 purposes:

- (a) to check the unrestricted sprawl of large built-up areas;
- (b) to prevent neighbouring towns merging into one another;
- (c) to assist in safeguarding the countryside from encroachment;
- (d) to preserve the setting and special character of historic towns; and
- (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Paragraph 143 of the NPPF (2019) states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 144 of the NPPF (2019) requires local planning authorities to 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.

Policy 7.16 of the London Plan (2016) and the Mayor's intend to publish London Plan Policy G2 (2019) state that the strongest protection should be given to London's Green Belt, in accordance with national guidance. Inappropriate development should be refused, except in very special circumstances. Development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt as set out in national guidance.

Policy DME1 4 of the Local Plan: Part Two (2020) states that extensions and redevelopment on sites in the Green Belt and Metropolitan Open Land will be permitted only where the proposal would not have a greater impact on the openness of the Green Belt and Metropolitan Open Land, and the purposes of including land within it, than the existing development, having regard to:

- i) the height and bulk of the existing building on the site;
- ii) the proportion of the site that is already developed;
- iii) the footprint, distribution and character of the existing buildings on the site;
- iv) the relationship of the proposal with any development on the site that is to be retained; and
- v) the visual amenity and character of the Green Belt and Metropolitan Open Land.

The proposal seeks to provide a film studio which does not fall within the exceptions set out within Paragraph 145 of the NPPF (2019), the proposed development is inappropriate development in the Green Belt, and it should therefore not be approved except in very special circumstances.

The site currently meets one of the five purposes of Green Belt which is to check the unrestricted sprawl of large built up areas. This area of Green Belt forms part of a larger ribbon that follows Yeading Brook and serves to separate parts of Yeading and Southall from Hayes.

The proposal seeks to provide a new film studio (Use Class Sui Generis) with associated works on land designated entirely as Green Belt. The proposal does not fall within the exceptions outlined in paragraph 145 of the NPPF, the proposal is therefore, by definition, inappropriate development within the Green Belt and therefore should not be approved except in very special circumstances.

In line with the NPPF (2019), great weight is attached to the protection of the Green Belt and the preservation of its continuing openness. The proposal would therefore be harmful to openness by definition.

The film studio will be a considerable building of a substantial scale, bulk and volume on what is currently an open site. Though it would be set back from the road by approximately 21m, the building would nevertheless be a highly visible and prominent feature. The overt increase in coverage, scale and volume of development on this part of the site would also have an impact on both the spatial and



visual openness of the site. The development would result in a reduction in the openness of this part of the Green Belt. However, the Applicant has revised the proposal to minimise its impact from sensitive views. The proposed development is set back from its western boundary by 26m, between which it proposes a 20m wide landscape buffer adjoining Minet Country Park. Substantial tree planting is proposed across the site within the car parking areas.

The proposal would conflict with the first of the Green Belt policy purposes which is to check the unrestricted sprawl of large built up areas. The proposal constitutes a form of urban sprawl that the NPPF (2019) is seeking to constrain. Taking into account the context of Springfield Road and the commercial development immediately to the north of the site, the development would not appear isolated or remote from the main built form of Springfield Road. The development may give rise to a small sense of 'overspill'. However, any sense of urban sprawl would be minimal in scale.

The proposal lies immediately adjacent to Strategic Industrial Land and therefore it is not a countryside setting and it would not result in harm in terms of preserving the setting of the countryside or of an historic town. Furthermore, while resisting development here might encourage regeneration outside the Green Belt, the scale of development is such that it would be difficult to attribute any material harm to this objective.

The NPPF (2019) states that very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and other harm resulting from the proposal, is clearly outweighed by other considerations. Great weight has been attached to harm to the openness of the Green Belt.

Paragraph 141 of the NPPF (2019) enhancement of the beneficial of the Green Belt should be sought. Examples given are looking for opportunities to provide access and for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. The existing site is fenced off from public access by palisade security fencing it comprises an open grassed area. The consultee responses, confirms that the proposal would provide for a net gain in biodiversity within the site and enhanced habitats off-site. This carries some positive weight.

The proposal includes an extensive set of landscaping measures, including a 20m wide landscape buffer planted with native trees, hedgerow and shrubs adjoining Minet Country Park and the inclusion of extensive tree planting within the car park. However, the primary purpose of this would be to screen the development. In that respect it seeks to mitigate the impact of the development, and there is no evidence to suggest that the landscaping would represent an enhancement of visual amenity in its own terms.

In the views in which the proposed buildings would appear, due to their size and nature the development would be perceived as having the character and appearance of a business park, in contrast to the existing undeveloped and open landscape. Notwithstanding this, in views from within the surrounding area, the site is seen in context with adjacent commercial buildings set against the backdrop of the city skyline and adjacent to other urban fringe land uses including school buildings, sport facilities and associated infrastructure on the edge of Minet Country Park. Adverse visual effects would be minor and localised to those experienced when passing the site.

In addition to harm to the Green Belt by definition as a result of the inappropriate development, the proposal would therefore give rise to Green Belt harm by reason of loss

of openness, clear conflict with 1 of the 5 Green Belt purposes, and a low adverse effect on landscape and visual amenity. Minor Green Belt benefits would arise from gains to biodiversity.

The Application has put details of very special circumstances in support of the development which Officers have considered against the inappropriate development within the Green Belt and any other harm. Officers consider the Applicants evidence setting out very special circumstances in favour of the development fall into the following individual categories.

- 1) Location and Need
- 2) Alternative sites/ Development costs
- 3) Economic Impact
- 4) Social Impacts
- 5) Impact on Openness

- 1) Location and Need

The existing West London Film Studio (WLFS) building is located on Springfield Road in Hayes and is part of the Hayes Industrial Area Strategic Industrial Location (SIL). The proposal site is located slightly to the north of the existing site and on the opposite side of Springfield Road. It is located directly adjacent to the southern boundary of the SIL and is also adjacent to Minet Country Park to the west and the Goals Hayes football complex to the south.

The purpose of the proposed additional studio space on the application site is to cater for unmet demand on the current WLFS site. The applicant indicates that the current film stages are operating at 90% occupancy and that demand will continue to grow despite existing approved increases at the larger strategic studio sites just outside west London (Pinewood and Shepperton). WLFS is catering for a more independent, peripatetic client base whilst the major studios are linked to one client e.g. Pinewood will be used exclusively by Disney and Shepperton by Netflix. In addition, a Lambert Smith Hampton (LSH) 2018 report on the UK TV and Film Studios Market makes an assessment that there is a need for 1.6 to 1.9 million sq ft of new film studio floor space in the UK over the next 15 years. Only 0.8 million sq ft is identified as being in the pipeline and much of this is long term projects that may take many years to come on stream. The findings of the LSH report are supported by Film London Chief Executive, Adrian Wootton who in a quote provided to Council's economic regeneration team has stated that:

"Prior to the COVID pandemic, the UK screen industries were experiencing a period of unprecedented growth. Inward investment spend from major international productions topped £3bn in 2019. The spend on high-end TV production alone reached nearly £1.3bn - the highest figure since records began and a 51% increase on last year's figures.

.The main threats to long-term sustainability and to capitalizing on this growth, prior to the pandemic, have been around availability of studio and work space, and skills to meet the increased demand. And these challenges remain. Simply put, we need more studio space to accommodate rapidly increasing demand from domestic and international studios and streamers."

The success of streaming services during the COVID pandemic and need to keep refreshing content is anticipated to ensure that need for additional floorspace in the TV and

film studio market will remain high as demonstrated by a recent deal signed for new studio space in the London Borough of Barking and Dagenham. West London Films Studios are the only such facility currently in the borough and offers the only opportunity for the local economy to benefit from such demand.

The location of the current WLFS as part of a wider West London studio cluster is also introduced as key to explaining the demand for additional studio space. Film London identity that approximately 75% of the existing TV and film industry is in London. Its traditional heartland is the western fringe of Greater London which is home to well established studios such as Pinewood, Leavesden and Shepperton. The location of the existing and proposed studios are located at the heart of the West London cluster allows them to capitalise on the infrastructure and skills that already support the success of the cluster as a whole. The applicant argues that if the studio is not able to expand in its existing location, it would be forced to look for premises outside of the borough and possibly outside of London to cater for the growing demand.

The last factor to consider is the need for the existing and proposed studios to be near one another. It is anticipated that once the second studio building is in operation that a large number of productions will work across both sites. TV and Film companies often require the use of more than one stage of varying sizes and the new studios will increase the flexibility that can be offered to such companies. The proximity of the studios will also allow projects to have crew from various departments (costume, make-up, art, etc) close by to all stages and will also faster turnaround of sets and a more efficient shoot. The applicant concludes that WLFS would not be able to attract the new productions its additional capacity is designed to accommodate unless the studio sites are able to operate in tandem with each other with crews continuously moving between the sites. The five-minute walk between the two studio buildings is considered that maximum that would still enable successful operation of multi-studio productions.

Based on all the information summarised above, it is considered that significant weight can be given to the need for the expansion of WLFS and the requirement for this to take place in close proximity to the existing studio site.

## 2) Alternative Sites/ Development Costs

The next issue for consideration in terms of very special circumstances is the need for the expansion to take place on a Green Belt site. The current studios are on a brownfield site within an Strategic Industrial Location and the developer has been required to demonstrate through a sequential assessment that no alternative brownfield sites are available.

Evidence has been provided to try and demonstrate that the application site is the only suitable location for the proposed film studio development within a wider west London search area. To support this position, the applicants have provided a 'Land and Building Report' which has investigated the availability of development land or buildings which could accommodate a new studio of 75,000 - 100,000 sq ft. The search area included sites in LB Hillingdon, LB Ealing, LB Harrow, South Bucks, Spelthorne and Slough. It also covers in detail the industrial estate within which the current WLFS is located. It is noted that whilst the site assessment does cover a large number of industrial sites, it is not clear that this includes all designated and non-designated industrial sites in Hillingdon and surrounding boroughs or that alternative brownfield sites such as the former retail sites have been fully explored.

In terms of the availability report, nearly all of the sites and buildings listed are identified as unsuitable as they are not available for freehold purchase and/ or because the steel frame construction would cause acoustic issues in terms of noise transference. On the first matter the report identifies that the applicant requires a freehold site due to the investment required to adapt any such building into a film studio. This level of investment is not considered viable or cost-effective on a leasehold site, primarily due to the high capital expenditure required and the time-limited nature of any lease. On the second issue of noise transference through steel frame construction, the report states that this is virtually impossible to limit through retrofitting.

However, as with any sequential assessment it is important to demonstrate flexibility and it is clear from the planning history on the current site of the West London Film Studio that the existing building was not a purpose built facility but has been operating successfully for a number of years. A short list of the most suitable sites would be expected together with a more detailed assessment of whether they could be adapted or redeveloped to meet the needs of the expanded film studio. There is also no detailed explanation of why all leasehold sites are discounted particularly when no further evidence has been presented on the likely terms of such leases. Consequently, the assessment is relatively high level and raises the concern that the position taken by the applicant is unrealistically inflexible given the nature of the industrial market in West London and the likelihood of a freehold brownfield site or an acoustically suitable building being available.

From the evidence submitted there are some sites near the WLFS which have been recently available and have not been pursued further by the applicant. These include the Hayes Data Centre, Glaze House and units at 180 Uxbridge Road. The availability reports rules out one of these sites in uses as a data centre as being economically unviable due to the high cost of the land. However, no detail is provided to explain in detail why this was considered unviable (comparative costings etc) or why the other sites weren't pursued further given in some respects, they would have been able to meet the applicant's requirements.

Following a further meeting with the applicant they have submitted further evidence in relation to these sites as follows:

#### Glaze House

This was bought in March 2017 by Hermes Real Estate Investment Management (a well-known significant UK property fund) for £6.3m. The property is 1.8 acres reflecting £3.5m per acre. The existing property was immediately let to Express Reinforcements and a successful planning application to change the use from B8 to B1c, B2 & B8 made in November 2017. The existing building was wholly unsuitable for film studio purposes in respect of size, eaves height and the viability to redevelop was precluded by price as evidenced by Hermes reletting it as existing.

#### Hayes Data Centre

At the point of sale this building was still let for a further 3 years to Deutsche Bank AG and the investment sale was based on a rental of £2,646,040 per annum reflecting approximately £24.85 per sq ft on the total GIA or £44.54 per sq ft on the GIA excluding mezzanine floor.

None of the building was considered suitable for film studio purposes and the purchase price of £11m reflects £4.25m per acre. This pricing and the cost of reinstating any of the building to a beneficial use was prohibitive and continued data centre use is planned. The main 'warehouse' style building is 47,000 sq ft but has a mezzanine floor effectively halving

the internal heights.

180 Uxbridge Road (known as Hayes 180)

This is a 4 building speculative industrial/warehouse development by a major financial institution, AXA IM. The 2 larger buildings sit in the middle of the development, both smaller than WLFS requires and a combination of leasehold, too low an eaves height (10m minimum height to units 2-4) and a prime rent of £13.95 per sq ft provided too many compromises for such expense.

It is clear from these comments that, as with the other sites investigated, much of what is driving the applicant's comments on availability stems from costs. It is therefore useful that the application has submitted a development appraisal (November 2019) to demonstrate their case in terms of the higher build costs of a film studio when compared to a B8 warehouse. The appraisal seems to demonstrate that the cost of constructing a film studio is 3.5 times greater than that of an industrial warehouse. The additional costs stem from higher prices for the building frame, external walls and upper floors which it is assumed are required to enable lighting rigs and sound proofing. There is also an additional cost for M&E which it is assumed is mechanical and electrical works which are not accounted for in the warehouse construction.

Unfortunately it is not possible for the Council to independently verify the scale of these additional costs but it does provide evidence in support of the principle which is accepted that due to the specialist requirements, the construction of a film studio is likely to be greater than a standard B8 warehouse. The applicant has indicated that given these additional costs it would not be viable for them to purchase or lease an existing commercial site. WLFS does not have the guaranteed end user of the larger studios such as Disney at Pinewood as it is seeking to provide studio space for independent, smaller scale productions. In addition, given the high upfront costs required to create studio floorspace, the applicant emphasises the importance of owning the site to ensure that this investment can be recouped over the longer term.

The 2018 Lambert Smith Hampton report referenced in section a) also adds some further context regarding the viability of potential brownfield sites. The report identifies that in locations such as West London where the logistics sector is prominent, sites that would be suitable for studio developments are being taken by this higher value sector limiting the availability of suitable sites for new studios, despite the evident strength of demand. In addition, the LSH report identifies that the uncertainty of income in the studio sector, with studios being rented on a short term basis by productions, can give new studio investments a relatively high risk profile making it more difficult for them to compete for sites which a logistics sector willing to take longer term leases. Furthermore, the LSH report shows that purpose-built film studios are able to secure significantly higher rents of approximately £50 per sq foot per year compare to less than £30 for re-purposed warehouses making the purpose-built option more sustainable to studio operators in the long term.

In summary, it is considered that there are alternative brownfield sites which would, in principle, be suitable for the purposes of expanding the WLFS. However, the evidence submitted by the applicant and the evidence within the 2018 LSH report has identified the unique characteristics of TV and film studio market that make it difficult for studio developers to access these sites. These include the increase construction costs due to sound proofing, increased floor to ceiling heights and strengthening of the building to hold light rigs. These factors, together with the higher risk profile of such developments in terms

of future income, make it difficult for them to compete with the prominent industrial sector in West London. On this basis it is considered that the lack of suitable alternative brownfield sites can be given medium weight as a very special circumstance.

### 3) Economic Benefits

An Economic Impact Appraisal has been submitted as part of the planning application. The key findings in terms of net job creation of the appraisal are as follows:

These estimates take into account the proportion of jobs that will be taken by people outside Hillingdon, the potential displacement of employment activity elsewhere, the proportion of employment that would have taken place anyway and multiplier effects on further economic activity (indirect and induced jobs).

The economic impact assessment identifies that the bulk of these jobs will be for production staff activity relating to the temporary use of the studios by production companies. Production companies bring a mixture of employed staff and self-employed contractors as well as utilising the services of local businesses. Once open, the studio itself will also employ a small number of employees directly. Taking all these factors into account, the expansion of the studio would have a net benefit in terms of jobs in the local area and across wider London economy.

In terms of economic value to the local economy, it is estimated that the current WLFS contributes £17.8 to £24 million of gross added value (GVA) to the local Hillingdon economy. The planned expansion is anticipated to contribute a further £17.7 to £23.3 million of GVA. The newly expanded WLFS will therefore contribute up to £47 million of GVA to the local Hillingdon economy. Undertaking the same calculation for the impact of an expanded WLFS on wider London economy the estimated combined figure is between £162.6 and £219.2 million.

It is widely recognised that creative industries make a substantial contribution to the UK economy with an essential component of this industry. Key statements of Government policy, both in written and spoken form, attach great significance to the delivery of sustainable economic growth. In terms of the translation of this into planning policy, the NPPF identifies the important role that planning should play in supporting economic development and growth.

These economic and employment benefits are significant to the local economy particularly given the recent challenges arising from the COVID19 pandemic and the need to capitalise on industries which continue to generate economic value. As discussed earlier, without expansion, it is likely that the studios would need to relocate away from the borough, and this would have a detrimental impact on the local economy in terms of economic value and employment opportunities. The potential to retain and enhance the economic benefits arising from an expanded WLFS should therefore be given significant weight as a very special circumstance.

### 4) Social Impacts

Whilst the proposed studio development will not have any direct social impacts, it is recognised that the proposal will result in social benefits from employment generation including security and social cohesion. Limited weight is attached to the social benefits of the proposal.

## 5) Impact on Openness

Any new development should also seek to minimise its impact on the openness of the Green Belt taking into account the visual amenity and character of the surrounding Green Belt land. The proposed studio building is both large in scale and footprint and its impact on the surrounding Green Belt including Minet Country Park is a matter of concern. Amendments have been made to the scheme to introduce a 20-metre-deep landscape buffer to the western boundary of the site. The buffer is intended to soften the transition between the new studio building and Minet Country Park, limit the impact on the character and openness of the Green Belt as well as significantly enhancing the ecological value of the site. The building will also be clad in muted colours that are intended to reflect the trees and adjacent landscape.

The location of the site at the urban fringe and adjacent commercial areas give it a low susceptibility to the proposed development despite its designation as Green Belt. It is recognised that this particular Green Belt site is located on the urban fringe and provides the transition from a built up commercial area to the north and east of the parkland landscape of Minet Country Park to the west. The most important view of the site in terms of impact on character and openness is that from the west. It is agreed that the proposed provision of the 20-metre buffer planted with native trees and hedges on this boundary will have a significant impact on softening the visual impact from Minet Country Park. Accordingly, the impact on character and openness of the surrounding Green Belt is likely to be only slightly negative in this instance.

### Conclusion on the case for expansion

Considering all the evidence submitted by the applicant, the potential very special circumstances have been weighted as follows:

- 1) Need and Location - medium significance
- 2) Alternative sites/ Development costs - medium significance
- 3) Economic impact - very significant
- 4) Social impacts - limited significance
- 5) Impact on character and openness - slight negative significance

WLFS caters for an independent and peripatetic in London. It makes a significant contribution to the local economy. The proposal would allow the current operation approximately double in size and capacity. Government policy seeks sustainable economic growth, and as part of this attaches high importance to the creative industries and specifically film. There is a widely acknowledged current shortage in UK studio capacity, with strong industry support for the proposal.

The proposal would deliver substantial economic benefits if implemented and occupied in full.

Alternatives have been reasonably considered by the Applicant. There is no firm evidence to undermine the conclusion that there is no identifiable alternative site that could accommodate the scale and nature of the proposal in proximity to the existing studio.

On the basis of the high level of demand particularly in West London, the specific requirements of TV/ film studios and the economic benefits of the proposal, particularly within the context of the COVID 19 pandemic, it is considered that are very special

circumstances justifying the development.

This is countered to some degree by the slight negative impact, however, it is considered that the proposal will have a limited impact on the openness of the surrounding Green Belt. The impact has been mitigated, to a significant extent, in key views to the west. It is concluded that overall there is a very strong, credible economic case for the proposed expansion the WLFS at this site and the very special circumstances case is sufficiently compelling to be given substantial weight in support of the development.

#### **7.02 Density of the proposed development**

Not relevant to the determination of the application.

#### **7.03 Impact on archaeology/CAs/LBs or Areas of Special Character**

##### ARCHAEOLOGY

Policy DMHB 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that the Council, as advised by the Greater London Archaeological Advisory Service, will ensure that sites of archaeological interest within or, where appropriate, outside, designated areas are not disturbed. If that cannot be avoided, satisfactory measures must be taken to mitigate the impacts of the proposals through archaeological fieldwork to investigate and record remains in advance of development works. This should include proposals for the recording, archiving and reporting of any archaeological finds.

The proposed development has been examined by the Greater London Archaeological Advisory Service (GLAAS) who have recommended that there are no archaeological requirements.

The proposed development is therefore deemed to accord with Policy 7.8 of the London Plan (2016) and Policy DMHB 7 of the Local Plan: Part 2 - Development Management Policies (2020) and the London Plan (2016).

##### CONSERVATION AREAS, LISTED BUILDINGS AND AREAS OF SPECIAL LOCAL CHARACTER

The application site is not designated as a Conservation Area or Area of Special Local Character and does not have any Listed Buildings located on site.

#### **7.04 Airport safeguarding**

Due to the height of the proposed building airport safeguarding issues are not relevant to the determination of the application.

#### **7.05 Impact on the green belt**

The impact of the proposed development on the function of the green belt is considered above within Section 7.01 'The Principle of Development' of this report.

#### **7.07 Impact on the character & appearance of the area**

London Plan Policies 7.1 and 7.4 (2016) and the Mayor's intend to publish London Plan Policies D1, D3 and D4 (2019) seek to ensure that new developments are well-designed and fit into the local character of an area. New buildings and spaces should respond to the form, style and appearance to successfully integrate into the local character of an area, with a positive relationship with the natural environment and respect and enhancement of the historic environment. London Plan Policy 3.4 (2016) and the Mayor's intend to publish London Plan Policy D3 (2019) also seek to optimise the potential of sites, having regard to



local context, design principles, public transport accessibility, and capacity of existing and future transport services.

Policy BE1 of the Local Plan: Part One (2012) requires all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents.

Policy DMHB 11 of the Hillingdon Local Plan: Part Two (2020) re-emphasises the importance of good design in new development by A) requiring all new buildings and extensions to be designed to the highest standards, which incorporate principles of good design, such as harmonising with the local context by having regard to the scale, height, mass and bulk of surrounding buildings; using high quality materials and finishes; having internal layouts and design which maximise sustainability and the adaptability of the space; protecting features which contribute positively to the area and providing landscaping that enhances amenity, biodiversity and green infrastructure; B) avoiding adverse impacts on the amenity, daylight and sunlight of adjacent property and open space; C) safeguarding the development potential of adjoining sites and D) making adequate provision for refuse and recycling storage.

Policy DMHB 12 re-emphasises the need for new development to be well integrated with the surrounding area and provides design criteria as to how this would be achieved.

The proposed studios would sit adjacent to light industrial units to the north and across the road to the east and would be read in the context of the industrial buildings.

The footprint of the building is setback from Springfield Road by 20m. The building would be up to 16m in height. The proposal comprises ancillary workroom accommodation to the west of the site that is accessed through the central entrance core. Office accommodation is proposed on the eastern and western part of the building at first floor level.

Plant equipment to serve the development is located on the roof concealed by the parapet screening from views from Minet Country Park. The proposed studio will be clad in Kingspan XL Forte Camouflage (RAL 110 50 10) to provide a soft colour that reflects the surrounding vegetation within the Minet Country Park. The proposed buildings would be in keeping with the established industrial character of Springfield Road.

The development proposal creates a 20m wide planted buffer zone adjacent the western boundary setting the main building to be as far as is practical from the park boundary thereby reducing the visual impact of the development from Minet Country Park.

The landscape scheme for the development includes native hedgerow and tree planting to the southern and eastern boundaries. This provides a defined edge to the site, softening views of the development. Overall, the revised proposal is considered to accord with the requirements of Policy BE1 of the Local Plan: Part One (2012) and Policies DMHB 11 and DMHB 12 of the Local Plan: Part Two (2020).

#### **7.08 Impact on neighbours**

Policy DMHB 11 of the Local Plan Part Two (2020) requires that development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

The proposed film studios would be located some 300m from the closest residential neighbours, located to the west of Minet Country Park and the Parkway (A312). While there may be some increase in vehicle movements associated with the development this would enter the classified road network at the Springfield Road / Uxbridge Road junction and as such is unlikely that this would result in any perceptible difference to residents on the opposite side of Uxbridge Road. Any additional illumination or signage would be subject to separate advertising consent.

As such it is considered that the proposal does not result in an un-neighbourly form of development and complies with the requirements of Policy DMHB 11 of the Local Plan: Part 2 - Development Management Policies (2020).

As such it is considered that the proposal does not result in an un-neighbourly form of development and complies with the requirements of Policy DMHB 11 of the Local Plan: Part 2 - Development Management Policies (2020).

#### **7.09 Living conditions for future occupiers**

The application relates to a commercial development with no residential properties proposed. Considerations in relation to residential amenity for future occupiers is not a relevant material consideration for this application.

#### **7.10 Traffic impact, Car/cycle parking, pedestrian safety**

Policy DMT 1 of the Local Plan: Part Two (2020) requires development proposals to meet the transport needs of the development and address its transport impacts in a sustainable manner. Policy DMT 2 of the Local Plan: Part Two (2020) notes development proposals must ensure that safe and efficient vehicular access to the highways network is provided to the Council's standards.

Policy DMT 2 of The Local Plan: Part 2 - Development Management Policies (2020) ensures development proposal have safe and efficient vehicular access to the highway network and would provide a safe, secure and convenient access and facilities for cyclists and pedestrian.

Policy DMT 6 of The Local Plan: Part 2 - Development Management Policies (2020) requires development proposal to comply with parking standards unless it would not lead to a deleterious impact on street parking provision, congestion or local amenity.

The application site is situated on Springfield Road in Hayes. Springfield Road is an adopted public highway leading off the busy A4020 Uxbridge Road. Springfield Road provides access to a range of uses and is characterised by heavy good vehicles making deliveries/parking on-street, cars parked on-street and school traffic generated by the Sikh Academy. The application site has a PTAL ranking of 2 indicating access to public transport is poor compared to London as a whole. This suggests that there will be a strong reliance on the private car for trip making.

#### **Car and Cycle Parking**

The new development would have 87 on-site car parking spaces. 9 car parking spaces would be wheelchair accessible. The Highway Authority has recommended that 17 car parking spaces should be served by active electric vehicle charging points with the remainder served by passive electric vehicle charging point. 5 motorcycle spaces would be secured by way of a condition.

The Greater London Authority has commented on the application requiring justification for

the quantum car parking proposed. It is noted that the site is located in an area with a low PTAL rating which means the reliance on car generated trips would be high. The Highways Authority has commented on the application noting that whilst filming and production does not take place every day, additional vehicular trips need to be catered for, not least the demand for extra car parking spaces.

In response, a Car Parking Management Plan has been prepared and submitted alongside the planning application. This proposes that car parking at the new development would be managed along similar lines to the existing West London Film Studios. Each week an allocation plan of on-site parking will be prepared. Whenever a production company books a stage, the contract will set out how many car parking spaces/permits they would be allocated. It is considered the quantum of car parking proposed is the minimum necessary to ensure the proposal would not result in the displacement of car parking on the local highway network to the detriment of existing commercial occupants of the Springfield Road Strategic Industrial Location. On this basis the quantum of car parking proposed is considered appropriate.

16 secure and covered long stay cycle spaces and 8 short stay cycle spaces near the entrance to the site is proposed. The proposed cycle parking provision is considered sufficient, final details of which is secured by condition.

#### Trip Generation

The information submitted in support of the application states 5 full time and 5 part time members of staff would be employed on a permanent basis. However when filming is takes place and 4 of the 5 stages are in use, the number of people working at the development would be many more. Based on information obtained from the existing West London Film Studios, the busiest time is when production and filming is taking place, there could then be up to 50 external staff working on each stage. However, when sets are being constructed, the number of external staff working at each stage is no more than 25 people.

To determine the number of trips the new development would generate, traffic surveys at the existing West London Film Studios were undertaken. These were carried out at the peak times mentioned above. At the time of these surveys 4 of the 5 stages were being rented out, 2 were at the construction stage, 2 at the production and filming stage. This is considered representative but the results can not be considered a worst case scenario, this would be when all 4 stages are being used for production and filming. The result of these surveys has been used to forecast the number of trips that the proposed film studios would generate. The developer reports that the development would generate 15 two-way vehicle trips in the AM peak and 14 two-way trips in the PM peak. This volume of traffic represents only a small increase over and above the existing flows along Springfield Road. The developer highlights that vehicle trips are spread across the day and therefore there is no significant conflict with school traffic.

#### Travel Plan

To accompany the planning application the developer has submitted a Travel Plan, this has been reviewed and is considered lacking; the bulk of the document is merely a summary of the sustainable travel options available locally for staff and visitors to use. Aside from giving each employee a 'Travel Information Pack' the Travel Plan contains little that would really incentivise sustainable travel behaviour. Shower, changing room facilities and lockers will be provided and there is a commitment to participate in travel awareness events such as

'Green Transport Week' and 'Lift Share Week'. A Travel Plan coordinator will also be nominated.

Wherever a Travel Plan is required as part of a planning permission, the Highway Authority require the developer to provide a £20,000 bond as surety that the Travel Plan will be implemented. If the Travel Plan fails to meet its targets, then the Council will use this bond itself to deliver the Travel Plan. This £20,000 bond should be secured by way of a S106 agreement.

Subject to the above, there are no highway objections to this proposal as it would be in accordance with Hillingdon Local Plan: Part 2 Development Management Policies (2020) Policy DMT 1: Managing Transport Impacts, Policy DMT 2: Highway Impacts and Policy DMT 6: Vehicle Parking. The Highway Authority is satisfied that the development would not present a risk to road safety, hinder the free flow of traffic or lead to parking stress; there are no highway objections to this development.

#### Highways Contributions

The traffic generated by the proposed development would result in additional demand for road space along Springfield Road which is already exceeding capacity evident by vehicles queuing at the Uxbridge Road junction. So that the development would be acceptable in highway terms a s.106 payment of £110,000 is required as a contribution towards a project seeks to transform Springfield Road from dysfunctional highway to a managed and efficient access road serving a all road users.

The project will provide a shared use footway along the length of Springfield Road for cyclist and pedestrians. This will include appropriate facilities for pedestrians and cyclists as they cross the numerous access roads and critical given that pedestrians travelling from the existing film studio to the new film studio will be expected to use an appropriate pedestrian crossing.

The current parking and delivery regime will be reviewed and remodelled to remove injudicious parking and allow deliveries and servicing to take place without impeding the free flow of traffic or presenting a risk to road safety. New street lighting will be provided and the carriageway resurfaced and remarked in response to the improvements delivered.

The scheme will include the provision of street trees so that the road is characterised by the ten Healthy Streets indicators. Springfield Road will form part of a route linking the Uxbridge Road at the Borough boundary with Hayes town centre via Minet Country Park and Coldharbour Lane.

#### **7.11 Urban design, access and security**

##### Urban Design

Refer to Section 7.03 and 7.07 of this report.

##### Security

Paragraph 7.13 of the London Plan (2016) requires development proposals to contribute to the minimisation of potential physical risks and include measures to deter crime and anti social behaviour. A secured by design condition has been recommended and therefore the proposal is considered to accord with Policy 7.13 of the London Plan.

#### **7.12 Disabled access**

Policy 7.2 of the London Plan (2016) require all new development in London to achieve the highest standards of accessible and inclusive design and supports the principles of inclusive design which seek to ensure that developments:

- a can be used safely, easily and with dignity by all regardless of disability, age, gender, ethnicity or economic circumstances
- b are convenient and welcoming with no disabling barriers, so everyone can use them independently without undue effort, separation or special treatment
- c are flexible and responsive taking account of what different people say they need and want, so people can use them in different ways
- d are realistic, offering more than one solution to help balance everyone's needs, recognising that one solution may not work for all.

The building design has been developed to comply with relevant legislation with particular attention being paid to Building Regulations Approved Document (Part M). It should be noted that parts of the building are not considered suitable for general access by disabled persons particularly the high level working platforms and plant decks. However access for the disabled has been carefully considered to all appropriate areas. Level entry points will be provided to all stages and workshops and fully compliant disabled access lifts to all raised office areas.

The Council's Access Officer has reviewed the proposed development and confirmed they have no objection to the submitted details or to the proposed scheme. Therefore the proposed scheme is considered to be in accordance with the Policy 7.2 of the London Plan (2016), and the Council's Supplementary Planning Document 'Accessible Hillingdon', adopted September 2017.

#### **7.13 Provision of affordable & special needs housing**

The application relates to a commercial development with no residential properties proposed. Considerations in relation to affordable housing provision are not therefore relevant to the application.

#### **7.14 Trees, landscaping and Ecology**

Policy 5.10 of the London Plan (March 2016) states that development proposals should integrate green infrastructure to contribute to urban greening, including the public realm.

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) also requires that new development is high quality, sustainable, adaptable, and harmonises with the local context. Landscaping and tree planting should also enhance amenity, biodiversity and green infrastructure.

Policy DMHB 14 of the Local Plan: Part Two (2020) notes all developments will be expected to retain or enhance the existing landscape, trees, biodiversity and natural features of merit. Planning applications for proposals that would affect existing trees will be required to provide an accurate tree survey showing the location, height, spread and species of trees.

The proposal seeks to incorporate 68 broad leaf native trees, mixed native hedgerows around the site perimeter, 1855 mixed native scrub species and 431 ornamental shrubs interspersed among the parking areas. This will result in a significant net gain of woody species on this site which will benefit biodiversity. The 20m landscaped buffer along the west boundary will provide a more significant landscape / environmental enhancement than the previously proposed sedum roof.

Details of Green Blue Urban tree support systems have been submitted notes that a suitable area of topsoil is available under the hard landscaped areas to support tree growth and long term sustainability.

A lighting report confirms 4 metre high lighting columns will be installed, with hooded luminaires and 4000K LED's. The lighting specification has been considered to be non-obtrusive, non-polluting and it prevents glare.

The revised proposal incorporates additional soft landscape details which will provide significant ecological enhancement and a substantial landscape buffer with the adjacent Minet Park.

The Trees and Landscaping Officer has commented on the application noting the amended soft landscape proposals are comprehensive and provide a robust landscape proposal which seek to mitigate against the impact of the development. It has been recommended that a condition is secured requiring details of hard and soft landscaping.

Following extensive discussions with the Applicant and a review of the revised plans, the Trees and Landscaping Officer has raised no objection to the application subject to the inclusion of relevant condition and the proposal is considered to comply with Policy DMHB 14 of the Local Plan: Part Two (2020).

## ECOLOGY

Paragraph 170 of the NPPF (February 2019) states that planning decisions should contribute to and enhance the natural and local environment by: d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Policy 7.19 of the London Plan (March 2016) states that development proposals should wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity.

Policy G5 of the Intend to Publish Version of the London Plan (2019) requires development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

Policy DMEI 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that the design and layout of new development should retain and enhance any existing features of biodiversity within the site.

The site forms part of the Yeading Brook and Minet Country Park Site of Importance for Nature Conservation (SINC, Borough Grade 1). The site was recommended as part of a wider extension to the SINC as part of the Local Plan Part 2 and SINC review (2015). The SINC is recorded as a series of open spaces supporting a diverse habitat mosaic along watercourses (Yeading Brook and Grand Union Canal) providing a potentially valuable wildlife corridor between other existing SINC's.

The Ecology Officer has reviewed the submitted details and advised the Officer has no objections to the proposed development in terms of Ecology. The Officer notes an

extensive 20m buffer that is to be planted at the north western edge of the site. Should this be planted and maintained as an ecological buffer (as well as for landscaping and visual impact reasons) the ecological buffer could offset the harm of the rest of the site and the woodland buffer, with other features of ecological importance could be a positive addition to the SINC. Furthermore, features within the built element of the scheme could provide additional ecological value providing a diverse opportunity for biodiversity.

Subject to this planning obligation and other conditions, the proposal would be considered to accord with the NPPF (2019), Policy 7.19 of the London Plan (March 2016) and Policy DMEI 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

#### **7.15 Sustainable waste management**

Policy 5.17 of the London Plan (2016) requires suitable waste and recycling facilities in all new developments. Policy EM11 of the Local Plan: Part One (November 2012) requires proposed development to address waste management at all stages of a development life.

It is considered that the application site has sufficient capacity for refuse and waste management. The Waste Strategy has raised no objections to this application.

#### **7.16 Renewable energy / Sustainability**

Policy 5.2 of the London Plan (2016) development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:

- Be lean: use less energy
- Be clean: supply energy efficiently
- Be green: use renewable energy

Policy EM1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that the Council will ensure that climate change mitigation is addressed at every stage of the development process. This includes the reduction of carbon emissions through low carbon strategies and encouraging the installation of renewable energy to meet the targets set by the London Plan (2016).

Policy DMEI 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) requires that: A) All developments make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets; B) All major development proposals must be accompanied by an energy assessment showing how these reductions will be achieved; C) Proposals that fail to take reasonable steps to achieve the required savings will be resisted. However, if the Council is minded to approve the application despite not meeting the carbon reduction targets, then it will seek an off-site contribution to make up for the shortfall. The contribution will be sought at a flat rate at of £/tonne over the lifetime of the development, in accordance with the current 'allowable solutions cost'.

The Council's Sustainability Officer has reviewed the submitted details and advised that they have no objections to the proposed development in terms of Energy, however the information submitted is not detailed enough to base detailed designs on. Further detail is also required as to how the carbon reduction will be achieved. There is a requirement for an offsite contribution which needs to be captured in the S106. The recommended conditions and Heads of Term are secured.

Subject to the above condition the development is deemed in accordance with Policy 5.3 of

the London Plan (2016), Policy EM1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) and Policy DMEI 2 of the Emerging Hillingdon Local Plan: Part 2 Development Management Policies.

#### **7.17 Flooding or Drainage Issues**

Policy 5.13 of the London Plan (2016) states that development proposals should use sustainable urban drainage systems (SuDs) unless there are good reasons for not doing so and that developments should aim to achieve green-field run-off rates. Policy 5.15 goes on to confirm that developments should also minimise the use of mains water by incorporating water saving measures and equipment.

Policy DMEI 10 of the Local Plan: Part Two (2020) requires all major developments in Critical Drainage Areas or an area identified at risk from surface water flooding must be designed to reduce surface water run-off rates to no higher than the pre-development greenfield run-off rate in a 1:100 year storm scenario, plus 30% allowance for climate change for the worst storm duration. The assessment is required regardless of the changes in impermeable areas and the fact that a site has an existing high run-off rate will not constitute justification.

The proposed development is within Flood Zone 1. The Council's Flood and Water Management Officer reviewed the submitted details and raised concerns about the proposals. The applicant submitted additional information in the form of a letter (MLM Consultants reference 6100501-MLM-ZZ-XX-RP-C-0002 dated December 2019). The Council's Flood and Water Management Officer has confirmed that this additional information alleviates their concerns. The additional green space improvements to the Country Park would provide local habitat enhancements and contribute to mitigating the loss of green infrastructure.

A Water Management condition is recommended to be attached to any grant of planning consent to ensure that the detailed design provides the most sustainable method of draining the site. This condition would be recommended and therefore the application is considered in accordance with Policies EM1 and EM6 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012), Policy DMEI 2 of the Local Plan: Part 2 Development Management Policies (2020) and Policies 5.12 and 5.13 of the London Plan (2016).

#### **7.18 Noise or Air Quality Issues**

Noise

The National Planning Policy Framework (NPPF) gives the Government's guidance on noise issues. Policy 7.15 of the London Plan (2016) seeks to reduce noise and minimise the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals.

Policy 7.15 of the London Plan (March 2016) states that development proposals should seek to manage noise by:

- a. avoiding significant adverse noise impacts on health and quality of life as a result of new development;
- b. mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens on existing businesses;
- c. improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity);



- d. separating new noise sensitive development from major noise sources (such as road, rail, air transport and some types of industrial development) through the use of distance, screening or internal layout - in preference to sole reliance on sound insulation;
- e. where it is not possible to achieve separation of noise sensitive development and noise sources, without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through the application of good acoustic design principles;
- f. having particular regard to the impact of aviation noise on noise sensitive development;
- g. promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that the Council will seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated.

The Council's Environmental Protection Officer has raised no objections to the proposals. Recommendations for external lighting are cited in the External Lighting Statement and are deemed satisfactory. The development is considered in accordance with Policy 7.15 of the London Plan (2016).

#### Air Quality

Policy 7.14 of the London Plan (2016) requires developments to at least be Air Quality Neutral and not lead to further deterioration of existing poor air quality, particularly in Air Quality Management Areas.

Policy DMEI 1 of the Local Plan: Part Two (2020) requires major development in Air Quality Management Areas to provide onsite provision of living roofs and/or walls. A suitable offsite contribution may be required where onsite provision is not appropriate.

The Local Plan recognises that living walls and roofs allow a number of environmental goals to be achieved in a relatively small space. They also remove particulates that improve local air quality. The Council's EPU (Air Quality) Officer has requested that a condition is added to the decision notice to ensure the proposal contributes to air quality enhancements.

Policy DMEI 14 of the Local Plan: Part Two (2020) requires development proposals to demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants. Developments are expected to be:

- Air quality neutral;
- Include mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors; and
- Actively contribute towards the continued improvement of air quality, especially within the Air Quality Management Area.

The proposed development is located within the Ossie Garden Focus Area, producing traffic emissions which will add to current high ambient annual mean values and exceedances of nitrogen dioxide in this sensitive area.

.As per the London Plan Intent to Publish (December 2019) and LBH Air Quality Action Plan 2019-2024, Developments are expected to be at least air quality neutral and contribute actively to reduce pollution in sensitive areas. The proposed development will generate 177 Annual Average Daily Traffic (AADT) flows and 323 AADT during periods and as such, the development is not considered to be air quality neutral.

The Air Quality Officer notes the level of mitigation required associated with the operation phase of the proposed development is calculated using Defra's Damage Cost Approach for the proposed development for traffic emissions is £95,158. Therefore, a Section 106 agreement Head of Terms is required so Hillingdon may deliver its air quality local action plan and or implement specific measures on/along the road network affected by the proposal that reduce vehicle emissions and or reduce human exposure to pollution levels.

#### **7.19 Comments on Public Consultations**

Consultation comments and objections have been addressed within the main body of the report.

#### **7.20 Planning obligations**

The Community Infrastructure Levy Regulation 2010 (Regulations issued Pursuant to the 2008 Act) and the NPPF have put three tests on the use of planning obligations into law. It is unlawful (since 6th April 2010) to request planning obligations that do not meet the following tests:

- i. necessary to make the development acceptable in planning terms
- ii. directly related to the development, and
- iii. fairly and reasonable related in scale and kind to the development

The effect of the Regulations is that the Council must apply the tests much more strictly and is only to ask for planning obligations that are genuinely necessary and directly related to a development. Should planning obligations be requested that do not meet the policy tests the Council would have acted unlawfully and could be subject to a High Court challenge.

At a regional level, policy 8.2 'Planning Obligations' of the London Plan (2016) stipulates that when considering planning applications of strategic importance, the Mayor will take into account, among other issues including economic viability of each development concerned, the existence and content of planning obligations. It also states that development proposals should address strategic as well as local priorities in planning obligations.

Policy DMCI 7 of the Local Plan: Part Two (2020) seeks to ensure development is sustainable, planning permission will only be granted for development that clearly demonstrates there will be sufficient infrastructure of all types to support it. Planning obligations are sought on a scheme-by-scheme basis to ensure that development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal.

Relevant Officers have reviewed the proposal, as have other statutory consultees. The comments received indicate the need for the following contributions or planning obligations to mitigate the impact of the development.

The obligations sought are as follows:

- i) To secure all necessary highway works including written agreement from the Local Planning Authority; (Section 278);

ii) Highways contribution of £110,000 towards highways improvements works along Springfield Road;

iii) A full and formal Travel Plan with associated £20,000.00 bond to include a Sustainable Transport Measures is required to be submitted and agreed in writing by the LPA before occupation of the development. Thereafter, the Travel Plan is required to be reviewed annually to monitor and if required, update and/or amend the document to the satisfaction of the LPA, in order that its aims and objectives are achieved;

iv) Carbon Fund: a contribution for a carbon fund to make up for the shortfall for this development and in order to make the development policy compliant (£1800 for every tCO<sub>2</sub>/annum that is below the zero carbon target);

v) Air Quality in line with the SPD and given the site is located in an air quality management area, a contribution in the sum of £95,158;

vi) Employment Strategy and Construction Training - either a contribution equal to the formula within the Council Planning Obligations Supplementary Planning Document (SPD) 2014, or an in-kind training scheme equal to the financial contribution delivered during the construction period of the development. Details shall be in accordance with the Council Planning Obligations SPD with the preference being for an in-kind scheme to be delivered. Securing an Employment/Training Strategy Agreement is Council's priority. Financial Contribution will only be accepted in exceptional circumstances; and

vii) Project Management and Monitoring Fee: a financial contribution equal to 5% of the total cash contributions towards the management and monitoring of the resulting agreement.

#### Community Infrastructure Levy (CIL)

In addition to S106 contributions the Council has adopted its own Community Infrastructure Levy (CIL). However the application is not Hillingdon CIL liable with respect to new floorspace being created due to it's Sui Generis Use.

In addition to the London Borough of Hillingdon CIL, the Mayor of London's Community Infrastructure Levy (CIL) has introduced a charging system within Hillingdon of £60 per square metre of gross internal floor area to be paid to the GLA to go towards the funding of Crossrail. This application is CIL liable with respect to new floorspace being created.

#### **7.21 Expediency of enforcement action**

Not applicable to this application.

#### **7.22 Other Issues**

##### Contaminated Land

Policy DMEI 12 of the Local Plan: Part Two (2020) requires proposals for development on potentially contaminated sites to be accompanied by at least an initial study of the likely contaminants. Conditions will be imposed where planning permission is given for development on land affected by contamination to ensure all the necessary remedial works are implemented, prior to commencement of development.

The Council's Contaminated Land Officer has reviewed the submitted details and confirmed that the application is acceptable subject to a condition being attached to any grant of planning consent.

Subject to the above condition it is considered that the development is in accordance with Policy DMEI 12 of the Local Plan: Part 2 Development Management Policies (2020).

#### Fire Safety

Policy D12 (Fire safety) of the Intend to Publish of the London Plan (2019) states that in the interests of fire safety and to ensure the safety of all building users, development proposals must achieve the highest standards of fire safety. A condition is proposed be added to any permission to secure a Fire Strategy for all parts of the development in accordance with draft Policy D12 (Fire safety) of the London Plan - Intend to Publish (2019).

#### Cadent Gas

Cadent Gas had raised some concerns relating to the gas pipeline running alongside the development. The applicant provided clarity on easements. Following a review of the details provided by the applicant, Cadent Gas withdrew their objection.

Nonetheless it is important that the site landscaping the planning team subsequently agrees matches the details of any property agreement separately agreed with cadent gas, as such the landscaping condition does have a reference to the applicant providing details of any mitigation required to satisfy Cadent gas.

### **8. Observations of the Borough Solicitor**

#### General

Members must determine planning applications having due regard to the provisions of the development plan so far as material to the application, any local finance considerations so far as material to the application, and to any other material considerations (including regional and national policy and guidance). Members must also determine applications in accordance with all relevant primary and secondary legislation.

Material considerations are those which are relevant to regulating the development and use of land in the public interest. The considerations must fairly and reasonably relate to the application concerned.

Members should also ensure that their involvement in the determination of planning applications adheres to the Members Code of Conduct as adopted by Full Council and also the guidance contained in Probitry in Planning, 2009.

#### Planning Conditions

Members may decide to grant planning consent subject to conditions. Planning consent should not be refused where planning conditions can overcome a reason for refusal. Planning conditions should only be imposed where Members are satisfied that imposing the conditions are necessary, relevant to planning, relevant to the development to be permitted, enforceable, precise and reasonable in all other respects. Where conditions are imposed, the Council is required to provide full reasons for imposing those conditions.

#### Planning Obligations

Members must be satisfied that any planning obligations to be secured by way of an agreement or undertaking pursuant to Section 106 of the Town and Country Planning Act 1990 are necessary to make the development acceptable in planning terms. The obligations must be directly related to the development and fairly and reasonably related to the scale and kind to the development (Regulation 122 of Community Infrastructure Levy 2010).

## Equalities and Human Rights

Section 149 of the Equalities Act 2010, requires the Council, in considering planning applications to have due regard to the need to eliminate discrimination, advance equality of opportunities and foster good relations between people who have different protected characteristics. The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The requirement to have due regard to the above goals means that members should consider whether persons with particular protected characteristics would be affected by a proposal when compared to persons who do not share that protected characteristic. Where equalities issues arise, members should weigh up the equalities impact of the proposals against the other material considerations relating to the planning application. Equalities impacts are not necessarily decisive, but the objective of advancing equalities must be taken into account in weighing up the merits of an application. The weight to be given to any equalities issues is a matter for the decision maker to determine in all of the circumstances.

Members should also consider whether a planning decision would affect human rights, in particular the right to a fair hearing, the right to respect for private and family life, the protection of property and the prohibition of discrimination. Any decision must be proportionate and achieve a fair balance between private interests and the public interest.

### **9. Observations of the Director of Finance**

Not applicable.

### **10. CONCLUSION**

The application seeks planning permission to provide a film studio with new sound stages, workshops with ancillary office accommodation as an extension to the existing West London Film Studios situated 150m to the south of the site.

The application proposal does not fall within the exceptions outlined in paragraph 145 of the NPPF, the proposed development is therefore, by definition, inappropriate development in the Green Belt and should not be approved except in very special circumstances. The proposed development would cause some limited harm to the openness of the Green Belt, and conflict with one of the five purposes of the Green Belt to a limited extent. The definitional harm and other limited harm to openness of the Green Belt is afforded significant weight, that very special circumstances will not exist unless the potential harm to Green Belt by reason of inappropriateness and any other harm is clearly outweighed by other considerations.

It is considered that the very special circumstances and other considerations put forward by the applicant, particularly in relation to the location need, viability, economic and social benefits of the proposal. It is considered the characteristics of the particular site, the relationship to the existing West London Film Studios, the individual circumstances of the film industry, and the details of the supporting economic case, taken together, clearly outweigh the harm to the Green Belt by reason of inappropriateness and harm to openness, even when affording this harm considerable weight. It is concluded very special circumstances exist to warrant allowing the inappropriate development, overriding the identified conflict with the Development Plan.

It is recommended that planning permission is granted subject to a Section 106 legal

agreement and planning conditions.

## **11. Reference Documents**

Hillingdon Local Plan: Part One - Strategic Policies (November 2012)

Hillingdon Local Plan: Part Two - Development Management Policies (January 2020)

Hillingdon Local Plan: Part Two Policies Map (2020)

The London Plan (2016)

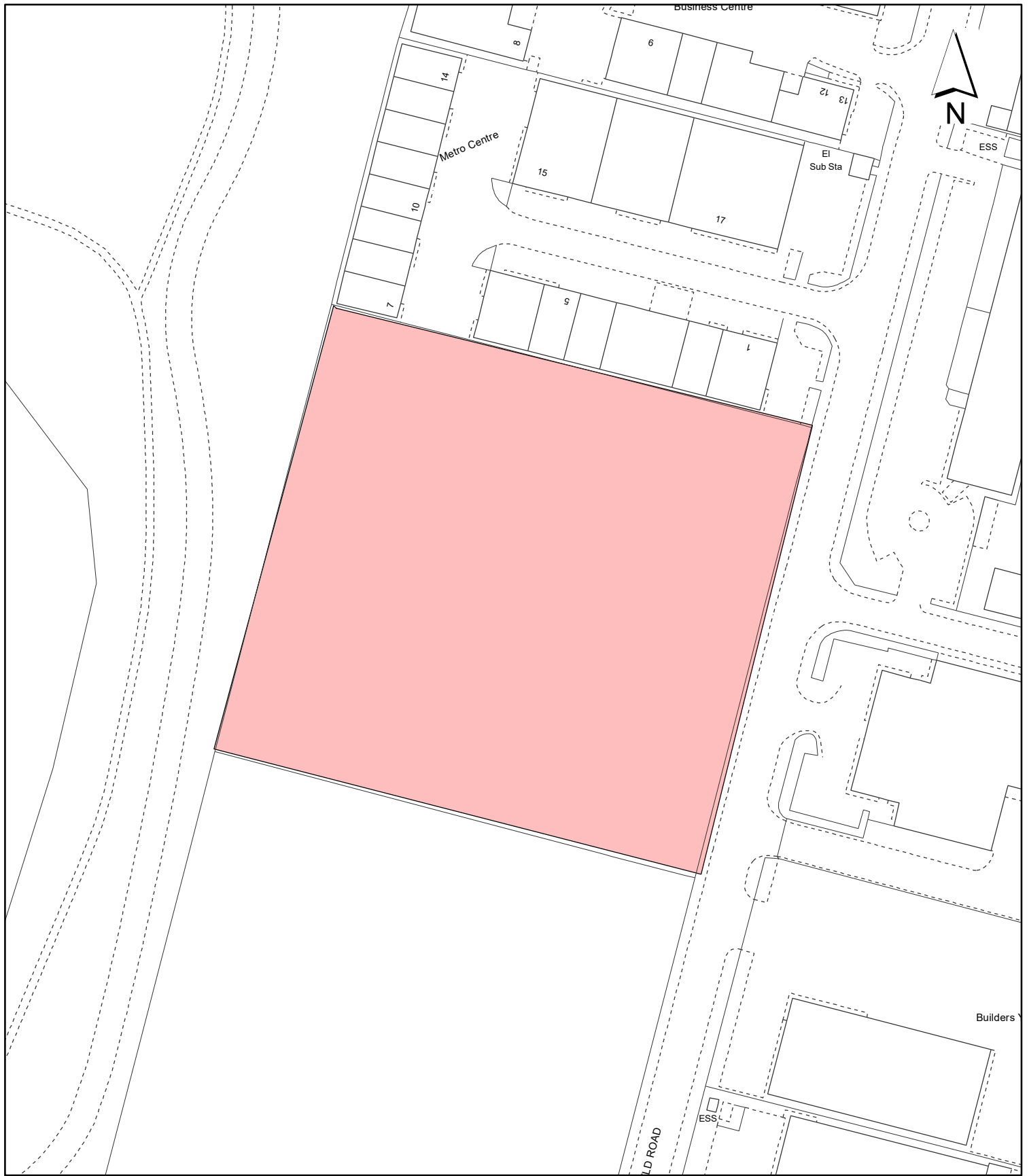
National Planning Policy Framework (2019)

London Plan Intend to Publish Version, December (2019)

Supplementary Planning Document 'Accessible Hillingdon', adopted September (2017)

**Contact Officer:** Zenab Haji-Ismael

**Telephone No:** 01895 250230



**Notes:**

 Site boundary

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Site Address:

**West London Film Studios**

**LONDON BOROUGH OF HILLINGDON**  
 Residents Services  
 Planning Section

Civic Centre, Uxbridge, Middx. UB8 1UW  
 Telephone No.: Uxbridge 01895 250111

Planning Application Ref:  
**46378/APP/2019/2970**

Scale:  
**1:1,250**

Planning Committee:  
**Major**

Date:  
**December 2020**



**HILLINGDON**  
 LONDON