



The countryside charity
Hertfordshire

31a Church Street
Welwyn
HERTS AL6 9LW
www.cpreherts.org.uk
office@cpreherts.org.uk
01438 717587

Standing up for Hertfordshire's countryside

Max Sanders
Planning and Building Control
Hertsmere Borough Council
Civic Offices
Elstree Way
Borehamwood
Hertfordshire
WD6 1WA

Our Ref:

Your Ref:

16th February 2022 (by email)

Dear Max Sanders,

Application no. 22/0044/FUL
Land East of Rowley Lane, Borehamwood
Use of land for a temporary period of three years for a backlot in association with Sky Studios Elstree, including set construction, filming, holding areas, feeding areas, parking areas, security areas and associated work

I write with regard to the above application to which CPRE Hertfordshire objects strongly for the following reasons.

1. The site is located in the London Metropolitan Green Belt as defined in the Hertsmere Core Strategy 2013 and Site Allocations and Development Management Policies Plan 2016, and thus development is inappropriate unless very special circumstances are demonstrated, as defined by the National Planning Policy Framework (NPPF). Various temporary permissions and Certificates of Lawfulness have been issued for the enabling works to the existing permission granted for Sky Studios and the temporary storage of materials and car-parking.
2. These consents and the proximity of the Sky Studios presently nearing completion provide a context where continued expansion of the uses may appear to be convenient given the amount of development which has already taken place. CPRE Hertfordshire challenges this perception fundamentally and believes that it is important for the Council to maintain the statutory protections afforded by the NPPF in respect of the Green Belt.
3. The Backlot site is proposed for allocation within the Media Quarter Borehamwood (Policy E6) Special Policy Area in the Hertsmere Draft Local Plan Regulation 18 document which was published in October 2021 for public consultation. The Planning Statement supporting the application notes that "if the site's allocation as part of the Media Quarter...is confirmed through the Local Plan process it will be removed from the Green Belt" (Lichfields 2021).

CPRE is working nationally and locally for a beautiful and living countryside

CPRE Hertfordshire is a Charitable Incorporated Organisation

President: Sir Simon Bowes Lyon, KCVO
Chairman: Allan McNab

Registered Charity 1162419



4. The Planning Statement continues to set this proposal firmly in the context of continued development and expansion of the film and television industry in Borehamwood. Significant weight is given to the Draft Local Plan policies which promote the continued development of the film and television industry which will inevitably lead to further encroachment, and has already led to the use of significant areas of open countryside.
5. Given the inevitable impact on designated protected areas of any substantial development proposal on open land in the Borough, it is reasonable to question whether further expansion is either appropriate or necessary in the light of the Government's strong commitment to 'levelling-up' in terms of regional economic policy. Considerable claims are made with regard to the economic benefits of new development in terms of employment and these are routinely found to be excessive following implementation.
6. In fact, the Planning Statement notes that there will no employment benefit from this proposal.
7. The recent record-breaking public response to the Hertsmere Draft Local Plan indicates the over-whelming support by local communities for the Green Belt. In light of this response, the Council has announced its intention to 'shelve' the Draft Local Plan pending further review. We urge the Council to take note of the representations made by local residents in respect of both the principle and specific proposals for development on Green Belt land.
8. In line with a wide range of economic activities, significant changes are taking place in the film and television industry which call into question the need for traditional backlots, particularly when there is already a substantial studio presence with extensive ground coverage. Convenience for a studio should be set against the loss of designated protected open land which is a scarce resource in the Borough, and we do not accept that the proposed use is appropriate in this location.
9. CPRE Hertfordshire would also question the temporary nature of the application in view of the intensity and magnitude of the works proposed. It would seem unreasonable, and possibly uneconomic, to anticipate that works comprising significant earth movement, bunding and hard-standing construction would only be in place for three years.



10. It is clear from the Planning Statement that the intent of the applicants is to continue developing Sky Studios with the likely implication that more permanent use applications will be made in the future. These are likely to make further demands on scarce open land and we urge the Council to re-assess the role and characteristics of economic activity, taking account of the significant changes which are taking place.
11. A further concern is the impact of the proposal (and almost inevitable further related proposals) on the neighbouring community of Well End. A key purpose of the Green Belt is to prevent the coalescence of urban areas and this proposal would prejudice that purpose in this location.
12. The application is also deficient with regard to proposals relating to the increasing requirements to take account of climate change and the promotion of biodiversity. The recently enacted Environment Act 2021 increases these requirements, and the likelihood of enforcement, and it might be expected that a global media company such as Sky Studios would wish to lead the way in demonstrating their commitment to environmentally appropriate development.
13. As noted by others, the proposals made in these respects are disappointing and appear minimal. In the event that the Council considers granting permission, it will be necessary to place significant conditions regarding biodiversity net gain and carbon reduction requirements which are not apparent in the present application.

Yours sincerely,

Chris Berry
Planning Manager