



The countryside charity
Hertfordshire

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Standing up for Hertfordshire's countryside

Peter Quaile
Planning and Development
Broxbourne Borough Council
Bishop's College
Churchgate
Cheshunt
EN8 9XQ

Our Ref:

Your Ref:

13th April 2022 (by email)

Dear Mr Quaile,

Application 7/22/0287/F

Theobalds Park Farm, Great Cambridge Road, Goffs Oak, Broxbourne

Redevelopment to create a new film and media studio complex including ground and enabling works partial demolition and demolition of existing structures works and change of use to existing listed buildings construction of stages workshops backlot and ancillary studio facilities and services (including offices staff amenity facilities mobility hubs and waste/recycling facilities associated with the principle use as a film and media studio complex) associated green space and other green infrastructure and associated works including soft and hard landscaping drainage utilities new vehicular access and associated works at A10 and Lieutenant Ellis Way junctions and other enabling works.

I write with regard to the above application and would raise a number of concerns due to its location adjacent to the London Metropolitan Green Belt. We recognise the very significant publicity which has surrounded the announcement of this proposed development and the strong support received from a wide range of institutions and organisations.

We also note that this proposal is one of several similar related to the expansion of the film and television production industry in Hertfordshire which are also being positively promoted by the Government and Councils involved. Most of these proposals affect significant areas which are presently designated as Green Belt, or recently removed from Green Belt through the Local Plan process, as in this case, and their implementation will result in a considerable reduction in the area of protected open countryside in the County.

In this case, as elsewhere, significant resources have clearly been used in the preparation of the application and supporting documents and studies, but, notwithstanding the allocation of this site in the Broxbourne Local Plan it is appropriate to question the strategic issues surrounding the further concentration of such activities in an area with so many constraints. The Government's levelling-up agenda would also suggest that economic activity should be re-balanced to provide jobs where they are needed more.

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

The recently published Levelling Up White Paper charts in significant detail the disparities between the regions of the United Kingdom in economic, social and political terms, and notes that not only the 'left behind' areas suffer from poor living conditions and low life satisfaction. The implications for areas with existing high levels of economic activity include increased pollution, congestion, high housing costs, and pressure on infrastructure (Levelling Up White Paper (LU WP) section 1.5.7), to which CPRE Hertfordshire would add pressure on open and highly valued countryside.

The Government's stated policy aims to address issues in both 'left behind' and 'steaming ahead' places, to reduce pressures on housing costs and living standards and related issues. As the White Paper notes; 'agglomeration can have negative side-effects for areas steaming ahead'. (LU WP section 1.7.1).

CPRE Hertfordshire believes that an entirely new commercial venture should be located where there would be greater economic benefit. Major film and TV studios are not limited to a specific location, and an alternative location should be sought when constraints are significant, as in Broxbourne.

Estimates for the provision of the employment to be provided by new development are regularly exaggerated by their promoters. The changing nature of employment, especially in the South and East of England, means that specific location is becoming less of a factor for employment provision.

Recent legislation, including the Environment and Climate Change Acts, will also place increasing responsibilities on local planning authorities and agencies to ensure that environmental issues are addressed appropriately, notably towards carbon reduction and biodiversity net gain. The various proposals for environmental treatment of the site are noted and these should be reviewed to ensure that they respond appropriately to the increasing requirements of present legislation.

In the event that the Council approves this application, we would urge the Council to impose wide-ranging and comprehensive conditions. The opportunity should be taken, through this application if permitted, to improve those areas adjoining the Green Belt to provide an enhanced open space for the surrounding communities. Similarly, the proposals made in the application for biodiversity net gain and carbon reduction are crucial, and Sunset Studios should be encouraged to go further to provide an exemplar development, given their high public profile and influence.



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Yours sincerely,

Chris Berry
Planning Manager