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Standing up for Hertfordshire's countryside

Mrs Claire Westwood
Development Management (Planning)
Three Rivers District Council
Northway
Rickmansworth
Herts WD3 1RL

Our Ref:

Your Ref:

1st April 2022 (by email)

Dear Mrs Westwood,

Application 22/0491/FUL

Warner Bros. Studios Leavesden, Warner Drive, Watford, WD25 7LP

The provision of new sound stages, workshops, production and post-production offices, Studio support facilities (including new welfare and café building) and new roundabout to provide vehicular access to the Studios and Island Site; the construction of decked car parking and a pedestrian footbridge (Island Site); the use of land to the west of the Studios for film production and associated activities (Backlot 2); ecological improvements to existing field (Lower Field) together with site-wide landscape and necessary utilities and infrastructure works, bund construction, and ground re-profiling.

I write with regard to the above application and would raise a number of concerns due to its location mainly in the Green Belt. We recognise the long-standing nature of the studios and the contribution they undoubtedly make to the local and wider economy, and their identification in the emerging Three Rivers and Watford Local Plans, and the support of their respective Councils.

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 Councils involved. Most of these proposals affect significant areas which are presently designated as Green Belt, and their implementation will result in a considerable reduction in the area of protected open countryside in the County.

In this case, significant resources have clearly been used in the preparation of the application and supporting documents and studies, but it is reasonable 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.

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.

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President: Sir Simon Bowes Lyon, KCVO

Chairman: Allan McNab

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Ideally therefore, we would seek any expansion of activity at Warner Studios to take place within their existing premises, preventing the need to use Green Belt land. In the event that the Council agrees that very special circumstances have been demonstrated for this inappropriate development, as required by the National Planning Policy Framework, we would urge you to impose wide-ranging and comprehensive conditions.

Recent legislation, including the Environment and Climate Change Acts, will 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. Together with recent Ministerial statements regarding the need to maintain the integrity of the Green Belt, these should constrain and guide any development which takes place in this location.

The opportunity should be taken, through this application if permitted, to improve those areas of the Green Belt which are released, 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 Warner Bros should be encouraged to go further to provide an exemplar development, given their high public profile and influence.

Yours sincerely,

Chris Berry
Planning Manager