



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

Our Ref:

Your Ref:

4<sup>th</sup> November 2022 (by email)

Dear Max Sanders,

**Application no. 22/1526/FULEI**

**Land North of Sky Studios Elstree, Rowley Lane**

**Development of a film and television production studio (Use Class E(g)(ii)) with ancillary floorspace, backlot, new access arrangements, car parking, landscaping, infrastructure and associated works**

I write with reference to the above application for the development of a new television and film studios in Elstree. The application is accompanied by very extensive supporting documentation and is clearly supported in principle by the Borough Council and significant business interests, both locally and nationally.

The proposed development is receiving mixed reactions from the local communities affected and it raises significant issues of economic and planning policy in addition to the local circumstances which will be relevant to the consideration of this application. CPRE Hertfordshire campaigns actively to protect and enhance open countryside, specifically land which has statutory protection, and we object strongly to this application for the following reasons.

1. The site lies within the London Metropolitan Green Belt as defined in the Hertsmere Core Strategy 2013 and Site Allocations and Development Management Policies Plan 2016 which proscribe inappropriate development according to criteria indicated in the National Planning Policy Framework (NPPF) unless very special circumstances are demonstrated. The Applicants in their Planning Statement identify the proposed development as an expansion of their existing studios located immediately to the south "to create a comprehensive studio complex, adding more jobs and investment into the local economy".
2. The site, over fifteen hectares, is entirely within the Green Belt and the Planning Statement (PS) notes that "The role of the Green Belt is considered and it is noted that the site makes relatively limited contribution to the five purposes of the Green Belt, as set out in para 138 of the National Planning Policy Framework (NPPF)". The PS continues to discuss the

“harm to the Green Belt... in the context of, inter alia, the Landscape and Visual Impact Assessment which accompanies this application (sic)”.

3. The Applicants accept “there will be an impact on openness and the perception of openness from the proposals”. To these concerns may be added encroachment on open countryside, significant changes to the character of the protected land and a clear extension of the urban area; implications which the designation of the Green Belt was designed to prevent permanently.

4. The NPPF is clear that alterations to Green Belt boundaries should only be undertaken through the Local Plan preparation process. It is entirely inappropriate to introduce issues in the PS relating to the purposes of the Green Belt when the requirement for planning applications is that very special circumstances be demonstrated within the existing designated area.

5. In any event, the recent shelving of the emerging Hertsmere Draft Local Plan due to the record-breaking public response to the Regulation 18 consultation demonstrates clearly local community concerns. The public responses to the emerging Draft Hertsmere Local Plan were overwhelmingly due to the allocation of protected land, specifically Green Belt, for residential and commercial purposes. This has led the Council to indicate that it will review and amend the emerging Local Plan and this may or may not include possible revisions to Green Belt boundaries.

6. In terms of the very special circumstances asserted by the Applicant as being demonstrated, three groups of issues are noted relating to:

- ‘need’; comprising the “overall need is compelling” based on national considerations
- the singularity of the location for the expansion of Sky Studios
- the socio-economic benefits accruing, which are not located.

7. CPRE Hertfordshire contends that neither a national requirement for economic activity nor generalised socio-economic benefits which may arise constitute very special circumstances which should relate to the conditions of the site and area affecting a proposal. The issue of the co-location with the existing Sky Studios should be weighted in the planning balance with the local detrimental impacts of the proposed development.

8. As relevant in our view is the recently published Levelling Up and Regeneration Bill and supporting policy information re-emphasising the importance of protection of the Green Belt, and forth-coming amendments to technical guidance should clarify the significance of this protection. It is increasingly clear that where all open land is designated as protected, such as in Hertsmere, there need to be special measures to maintain that protection and the re-



balancing of development away from what the Levelling Up and Regeneration White Paper referred to as 'over-heated areas' such as south west Hertfordshire.

9. CPRE Hertfordshire will continue to promote the opportunities offered by alternative locations for development which do not result in the use of open countryside. We do not believe that very special circumstances have been demonstrated for this particular development in terms of the planning balance, as additional economic activity of the type proposed can be located in alternative locations.

Your sincerely,

Chris Berry  
Planning Manager