

**PLANNING STATEMENT (INCLUDING DESIGN
AND ACCESS DETAIL)**

FOR

**FULL PLANNING PERMISSION TO RETAIN THE EXISTING
STUDIO BUILDING AND ASSOCIATED PRODUCTION SPACE IN
ASSOCIATION WITH THE APPROVED USE OF LAND FOR
FILM-MAKING**

AT

**BOVINGDON AIRFIELD
CHESHAM ROAD
BOVINGDON
HEMEL HEMPSTEAD
HP5 3RR**

**Submitted on behalf of
ITV Ltd**

May 2023

1. INTRODUCTION

- 1.1 This statement is submitted on behalf of our client, ITV Ltd, in support of a full planning application to retain the existing studio building and associated production space, for use associated with film making and TV productions, on land at Bovingdon Airfield, Chesham Road, Bovingdon, Hemel Hempstead, HP5 3RR.
- 1.2 By way of background, temporary planning permission was granted in 2018 (4/01152/18/MFA) for the use of land for film making for a five-year period. This included the erection of a temporary studio structure and associated production space which benefits from planning permission up to 24/08/2023. This application seeks to make the studio building permanent.
- 1.3 It is material to this application that in 2021, permanent planning permission was granted for use the land on which the building sits, for film making. This formed part of a wider permission for film making at Bovingdon Airfield (20/03194/MFA). It did not, however, extend the life of the temporary studio building erected under 4/01152/18.
- 1.4 This application, therefore, seeks permanent planning permission to retain the existing studio building and associated production space. No changes are proposed to the studio structure itself, nor to its use, which will remain in use for film making and TV Production. The application does, however, include the retention of additional production space, as explained in this statement.
- 1.5 We accept that, due to the location of the site in the Green Belt, and the nature of the proposal, the proposed development will be found to be 'inappropriate development' in the Green Belt. However, the building is positioned on previously developed land that is consented for film making. The retention of the existing studio can therefore meet demand for additional studio space without extending beyond the confines of the existing consent.
- 1.6 In addition, the retention of the studio will bring significant direct and indirect economic benefits to the local and national economy through employment and spend, supply and service and would support the growth of the creative sector, with the film making industry contributing £2.84bn to the UK economy in 2020 (BFI Research and Statistics Unit July

2021) . As such, we contend that very special circumstances exist to justify the proposed development.

1.7 At the request of Officers, (through a Pre-application Enquiry meeting), and if deemed necessary, the Applicants, ITV Ltd are willing to enter into the legal agreement to secure the employment and social benefits in the longer term.

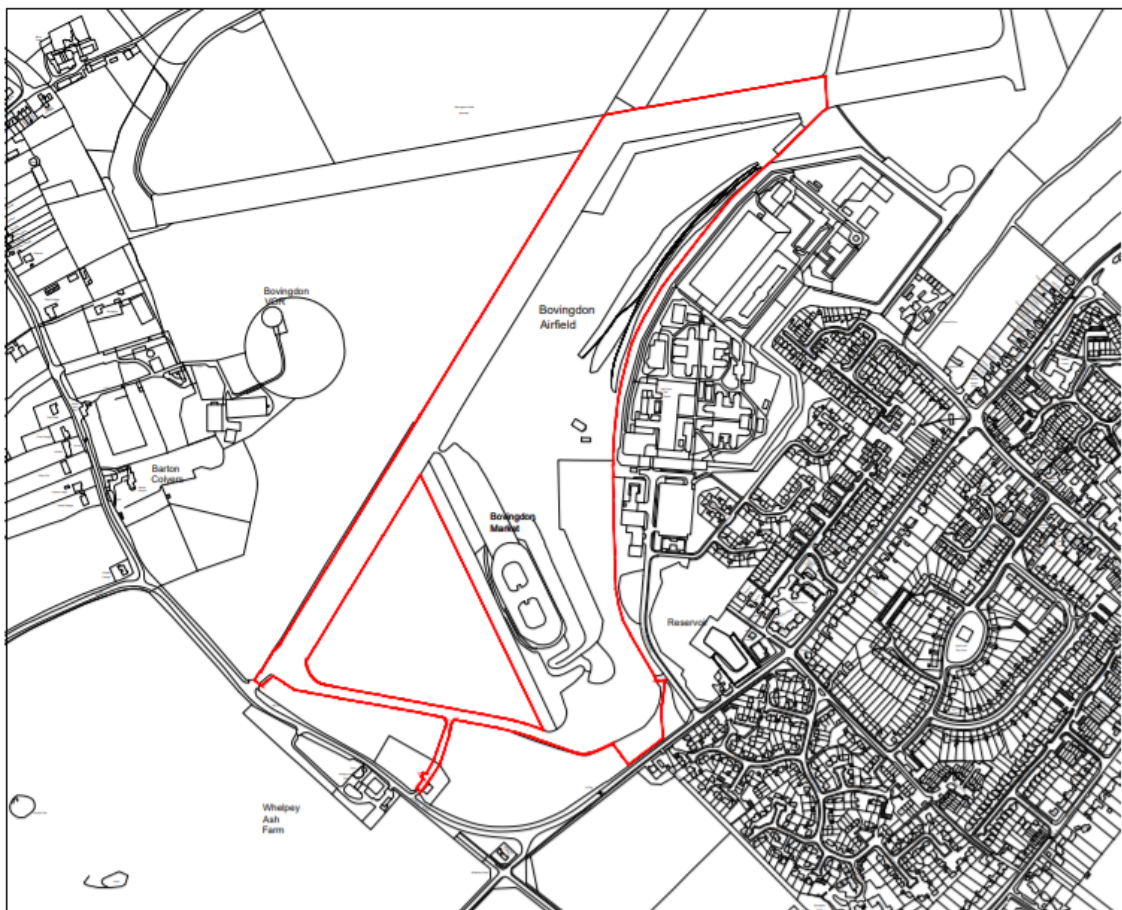
1.8 Within this statement we set out the context of the site and its history before describing the development. We then provide a detailed assessment of the proposal, demonstrating that the benefits of the development would clearly and demonstrably outweigh any resulting harm, such that planning permission can be approved.

1.9 The application is accompanied by the following documents:

- Location plan and Block plan
- Drawings of Studio
- Drawings of Props store
- Parameters plan of temporary Production buildings / Portacabins
- Statement from ITV Productions Ltd of Employment & Social benefits

2. SITE DESCRIPTION

- 2.1 The application site lies within Bovingdon Airfield which is located to the north of Bovingdon and east of Whelpley Hill. The airfield lies outside the defined settlements for these two villages on land designated as Green Belt.
- 2.2 The former airfield consists of two main runways in a 'X' formation, which are laid to tarmac and are in reasonable condition. A third runway lies to the southern end of the airfield site and is currently used by the weekly outdoor Bovingdon market, (which will be vacating the property in May 2022). The principle area of the airfield is shown on the mapping extract below, the red line denotes the area where a permanent planning permission was granted for film making in 2021, referenced 20/03194/MFA. The site, the subject of this application lies within and to the north of this redlined area.



*Site plan showing the area of land approved for film making outlined red
(20/03194/MFA)*

2.3 The application site is situated on an existing area of hardstanding comprising part of the former east – west runway. This is shown on the location plan below.



Site Location Plan

2.4 The site itself measures 9 hectares and the location of the site and building thereon can be seen in the aerial photograph below.



Aerial photograph showing the location of the existing studio building

- 2.5 In terms of access, the site is conveniently located close to the A41 to the north and Chesham Road to the south. This ensures easy access for vehicular traffic, including large HGV's.
- 2.6 Access for vehicles will be taken from Chesham Road, which borders the airfield to the south. There are two access points which are already used to serve existing film use permissions covering the site, and provide good sightlines onto the public highway, ensuring safe access to and from the site.
- 2.7 Any larger articulated vehicles will use the main western access, as has been the case with other filming applications approved at the site.
- 2.8 It is of note that there was no objection to the temporary studio on highway safety grounds. Nor has there been any highway objection to previous filming applications across the wider airfield site, which would have taken into account the impact of this building, in combination.

3 PLANNING HISTORY

- 3.1. Bovingdon Airfield has been host to a number of television and film productions in recent years, with a number of planning and prior notification applications made and approved for the temporary use of land for film making. This includes the application site which has been used to film Dancing on Ice, The Masked Singer, Michael McIntyre’s The Wheel, and other ITV and production company dramas, following a grant of temporary permission in 2018 (4/01152/18/MFA).
- 3.2 More recently, permanent planning permission has been approved to use the wider site (which includes the land on which the application building sits) for film making (20/03194/MFA).
- 3.3 The table below sets out the relevant planning history in relation to filming on the wider airfield site and reveals that there is significant and growing demand for appropriate filming space by the film and TV industry in this area.

Reference	Description	Decision
20/03194/MFA	Use of land for film making to include earth works to remove 'bund' and construction of 3 permanent studios & creation of 'backlot space' to allow for construction of temporary studios with associated support services and parking. Use of former control tower as office space and/ or as film set. Construction of security building at entrance	Approved 09/11/2021
20/04057/FPA	Temporary Use of Land for film making	Prior Approval Granted 25/02/2021
20/03594/FPA	Temporary Use of Land for film making	Prior Approval Granted 28/01/2021

20/02066/FUL	Temporary change of use of land for film-making for 8 month period. Construction of temporary 'studio' structure, following part removal of the bund and use of hardstanding for stationing of support services and storage.	Approved 22/10/2020
19/03213/FUL	Temporary use of land for filming.	Approved 09/04/2020
4/02683/18/FUL	Temporary planning permission for use of land for film-making for 35 weeks to include construction of set and use of hardstanding for stationing of support services, associated storage and parking	Approved 14/01/2019
4/01152/18/MFA	Temporary planning permission for use of land for film-making for 5 year period. To include temporary studio structures. Associated parking	Approved 28/08/2018
4/00394/18/FUL	Temporary planning permission for use of land for film-making for 40 weeks to include construction of set and use of hardstanding for stationing of support services, associated storage and parking	Approved 06/04/2018
4/00392/18/FPA	Prior notification of the temporary use of land for film making purposes under class e, part 4, schedule 2 of the town and country planning (general permitted development) (england) order 2015. Use of land for construction of stage set and associated parking	Prior Notification Refused 06/04/2018
4/02373/17/FUL	Temporary planning permission for use of land for film-making for 13 weeks to include construction of set and use of hardstanding for stationing of support services, associated storage and parking	Approved 09/11/2017

4/01678/17/FU	Temporary planning permission for use of land for film-making for 13 weeks to include erection of stage structure and use of hard standing for stationing of support services, and parking	Approved 13/09/2017
4/01559/17/FUL	Temporary planning permission for use of land for film-making for 28 weeks to include erection of studios and use of hard standing for stationing of support services and storage	Approved 23/08/2017

3.4 These permissions, and the desire by ITV to make the existing studio a permanent fixture at the site, demonstrate the demand for longer term filming at Bovingdon, with the site having established itself as an excellent filming location.

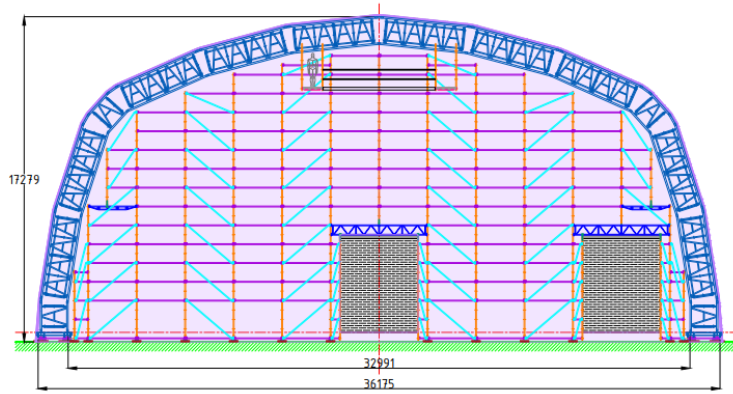
3.5 Of particular relevance to this application are applications 4/01552/18/MFA and 20/03194/MFA and these are looked at in more detail below.

3.6 **4/01152/18/MFA**

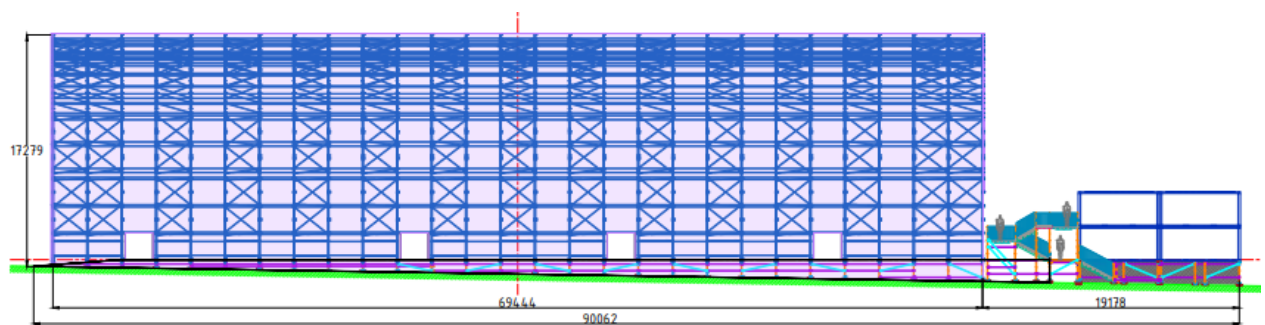
3.7 On 28/08/2018 temporary planning permission was granted to ITV Ltd for ‘use of land for film-making’ for a 5-year period. This included temporary studio structures and associated parking and was subject to the following condition:

2 This permission is for a limited period expiring on the 24/08/2023 by which time the use of the for filming shall have ceased and all structures and associated development shall be dismantled and permanently removed from the site.

Reason: The permission for the film use and building is based on a temporary basis and in the interests of the openness of the Green Belt, it shall be removed after the temporary period expires in accordance with policy CS5 and the NPPF.



Approved Section Plan (eastern end)



Approved Side Elevation (South)

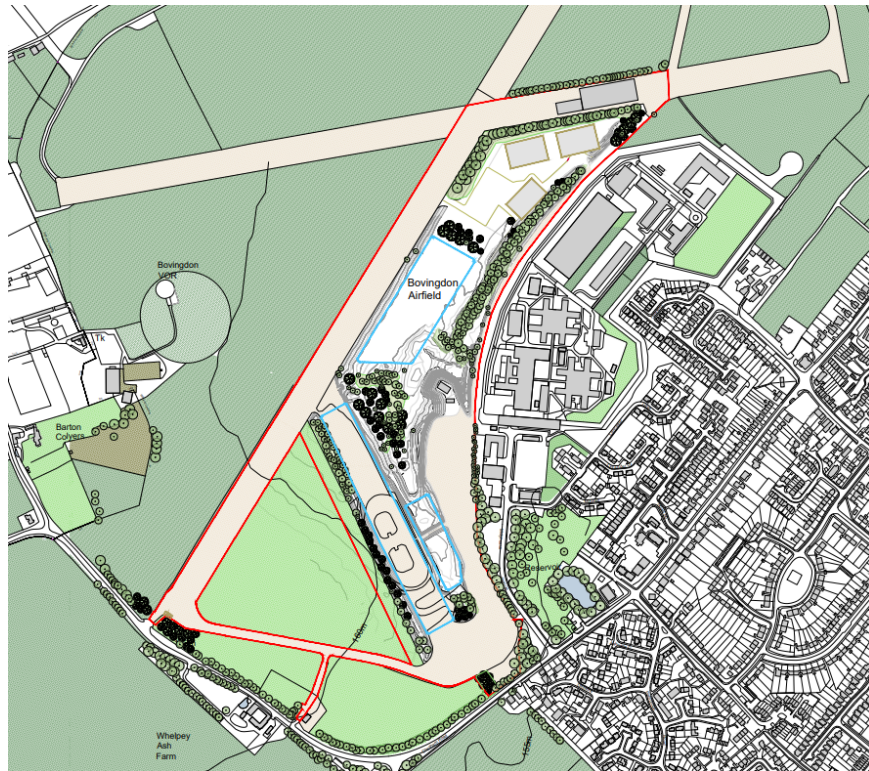
3.8 Since the building's approval, additional production cabins have been added to the western end of those approved (visible in the aerial image above) and this application seeks their retention.

3.9 The use of the land for film making has since been made permanent with the approval of permission reference 20/03194/MFA, which covers a substantial area of the airfield to the immediate south of the application site and including the application site (see below). With the use of the land for film-making approved, this application is solely for the permanent retention of the building thereon.

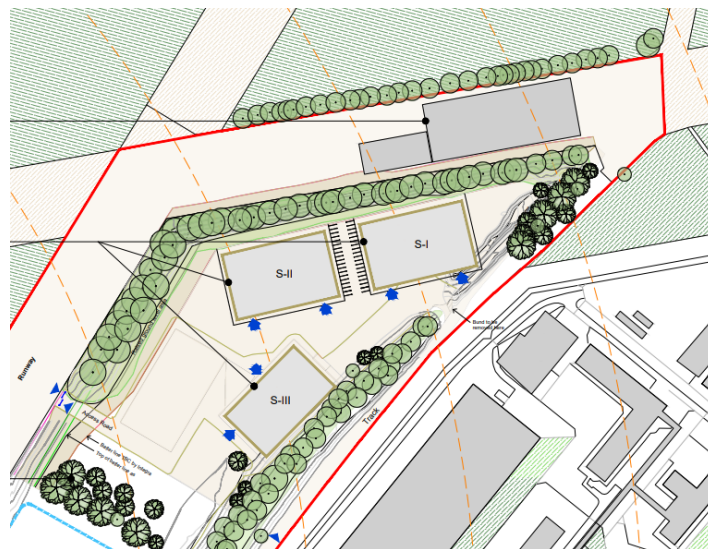
3.10 20/03194/MFA

3.11 On 9 November 2021 planning permission was granted for use of land for film making to include earth works to remove an earth 'bund' and construction of 3 permanent studios & creation of 'backlot space' to allow for construction of temporary studios with associated support services and parking. Use of former control tower as office space and/ or as film set and construction of security building at entrance.

3.12 The approved site plan can be seen on the following page with the three permanent studios sitting to the south of the application site. These buildings measure between 15 – 17m in height and from 2067sqm in area to 2530sqm. and have now been constructed and will shortly be in use for a major feature film production.



Approved Site Plan (20/03194/MFA) with the red outline indicating the area approved for film-making



Site Plan Extract – Northern Quarter – showing existing ITV studio

4 THE APPLICATION PROPOSAL INCLUDING DESIGN AND ACCESS DETAIL

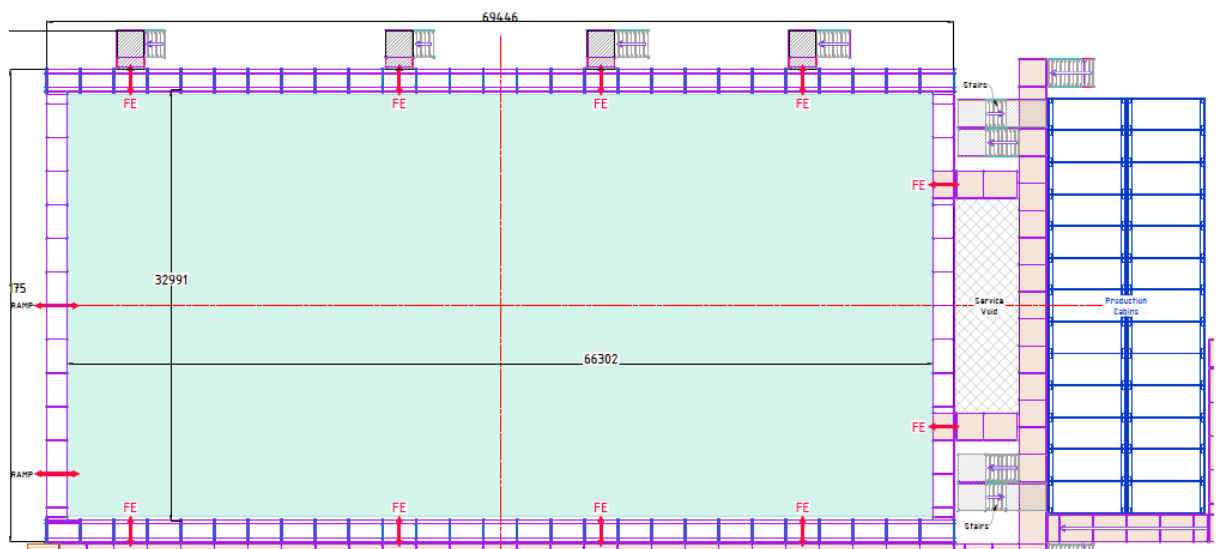
USE AND AMOUNT

- 4.1 Planning permission is sought for the retention of the existing studio building and associated production space for the purposes of commercial film-making. The studio building was granted temporary planning permission for 5 years under application reference 4/01152/18/MFA. This application site area proposes a modestly enlarged area to the temporary consent granted to include additional land for car parking adjacent to the studio building.
- 4.2 The main studio building measures 70m deep by 35m wide and is 17.3m in height. This gives the studio building a floor area of 2,450sqm.
- 4.3 The space is owned and operated by ITV Ltd and has been used to film TV productions including The Masked Singer, Dancing on Ice and The Wheel, as well as other ITV productions.
- 4.4 The studio space is also available for dry hire to other film and television companies (dry hire being the hire of the space / venue only) which has proved immensely popular. There remains a high demand for studio space for film and High End TV productions and particularly this studio, which provides an exceptional space for filming given its overall height and floor area.
- 4.5 Attached to the studio building is associated production space. This comprises a range of 26 single storey buildings connected to each other and the studio space by a walkway link. These are temporary 'porta-cabins' but it is intended these remain in situ. Due to the varying needs of each production the number of portacabins on site is subject to change, however typically 26 are present. A parameters plan/ building schedule accompanies this application to show the area and extent of portacabins at the site alongside their typical appearance.
- 4.6 To the eastern side of the studio building, a series of 'prop' stores are present. Like the production space, prop storage space may fluctuate between productions. In addition,

to the portacabins and prop stores, there may be an additional need for marquees to the east or west of the site, these will typically be used for welfare purposes in association with a TV or film productions. These would be temporary in nature and be put up for a matter of months to be used by a specific production and to meet their requirements. We supply with this application images / drawings of a typical structure.

LAYOUT AND SCALE

- 4.7 The size of the studio building was dictated by the technical requirements of the original use (the TV series - Dancing on Ice). This created a generous studio that has since met the needs of other ITV productions and been sought after by other producers. This is due to the quality of the space provided, its generous clearance height and high specification 'mother truss' (rigging) system.
- 4.8 In addition to the studio structure, this application proposes the retention of the production offices and associated welfare facilities contained within the smaller, attached buildings, to the west of the studio.
- 4.9 Floor plans of both the studio and production space are provided on the following page, with the layout shown on the submitted block plan.



Floor plans

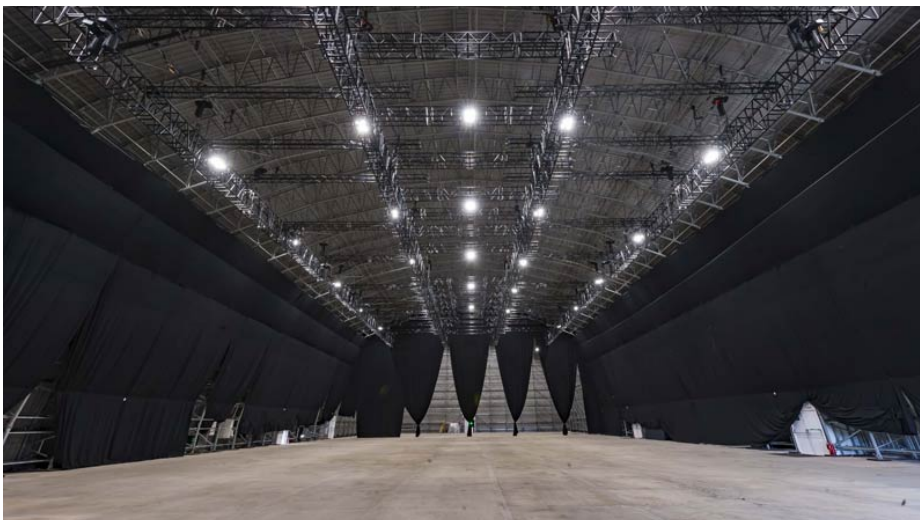
APPEARANCE

- 4.9 The main studio structure comprises a scaffold frame over which have been placed a cover of rigid panels. These are finished in dark green to reduce the visual impact of the building.
- 4.10 The production space, comprising two large cabins, are also finished green. Elevation plans have been submitted with the application proposal and photographs of the inside and outside of the building are provided below.



ITV Studios and Production Cabins – West and South Elevations

Source: ITV Studios Bovingdon



Internal view of the existing studio building (Source: ITV Studios Bovingdon)



*Existing studio building – west elevation
(Source: ITV Studios Bovingdon)*

LANDSCAPING

4.11 The site is already well screened by existing trees and vegetation. The result is that the building is seen against the backdrop of existing planting which screens the development in longer distance views. New landscaping has also been approved under application 20/03194/MFA and includes significant planting in the area to the immediate south of the existing building. This will help further soften the development, with the details to be submitted to and approved by the local planning authority, in accordance with condition 16 of this consent.

ACCESS

4.12 Access for vehicles will be taken from two existing access points on Chesham Road which borders the airfield to the south. These are established access points and provide safe access and egress to the site. They have been used historically by the airfield and more recently by the Saturday 'Bovingdon Market' and other filming applications at the site.

- 4.13 Traffic associated with the film use has been and will continue to be instructed to approach the site from the A41 to the east, joining the B4505 through Bovingdon village and onto the Chesham Road to the site entrance to the north west of the village.
- 4.14 The type of vehicles and the level of traffic to and from site will fluctuate depending on the requirements of each production and the filming phases, but will be no greater than has been seen over the past 3 years use of the ITV studio which has been deemed acceptable .
- 4.15 In general, the preparation prior to each production coming onto the site will involve the movement of trucks to and from site to deliver / collect set, plant and machinery for filming purposes. The prep/strike period following filming will generally involve a low volume of larger vehicles to and from the site.
- 4.16 The highest number of car movements will be seen on filming days, in particular where those involve studio audiences. The number of vehicles involved, however, would be much lower than those typically seen on Saturdays for visits associated with the market.

PARKING PROVISION

- 4.17 Parking associated with filming will take place on the former runway (existing hard standing only), adjacent to the studio on its western side. The area is extensive and sufficient in size to accommodate the amount of space required for the parking of associated vehicles and equipment in relation to the filming use of the land.
- 4.18 Parking on site will be provided to meet the current standard as set out within the Council's adopted Parking Standards SPD. Officers confirmed, within their report (20/03194/MFA) to Committee that they were of the opinion that a film studio fell into Class B2.
- 4.19 Appendix A of the Parking Standards SPD states that B2 uses are required to provide one space per 75m² (GEA). The floor area of the building is 2,450sqm, thus relating to a requirement to provide 33 spaces. The proposal will meet this standard.
- 4.20 As with application 20/03194/MFA there will be an over provision of parking spaces, above the current B2 standard. The nature of the filming use and the location of the

site is such that parking levels above the adopted standard is necessary. It is worthy to note, that the nature and level of parking will fluctuate throughout a production period with prep and strike periods having a lower need for vehicular parking compared to filming.

- 4.21 The area adjacent to the studio has been a sufficient size to deal with the level of vehicles associated with the temporary studio use. The permanent retention of the studio building will not alter the level of parking need over existing requirements and it is the case that the area identified is considered of a sufficient size to accommodate the required level of parking of associated vehicles and equipment in relation to the filming use.

5. RELEVANT PLANNING POLICY

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires all applications for planning permission to be determined in accordance with the development plan, unless material considerations indicate otherwise.

5.2 In terms of local planning policy, the development plan comprises the Dacorum Borough Council Core Strategy 2016 – 2031 (Adopted 25/09/2013) and Dacorum Borough Local Plan 1991- 2011 (Adopted 21/04/2004).

5.3 The Core Strategy sets out the strategic vision, objectives and spatial strategy for the borough for 20 years and those policies relevant to this application include:

- NP1 Supporting Development
- CS1 Distribution of Development
- CS5 Green Belt
- CS7 Rural Areas
- CS8 Sustainable Transport
- CS9 Management of Roads
- CS12 Quality of Site Design
- CS25 Landscape Character

5.4 The Local Plan should be read alongside the Core Strategy with the following saved development management policies considered relevant:

- Policy 34 Other land with established employment generating use
- Policy 51 Development and transport impacts
- Policy 57 Provision and management of parking
- Policy 111 Height of buildings

5.6 The National Planning Policy Framework (NPPF) 2021 is a material consideration in the determination of this case and the following are considered relevant:

- Chapter 6 - Building a strong, competitive economy
- Chapter 9 - Promoting Sustainable Transport
- Chapter 11 - Making effective use of land
- Chapter 12 - Achieving well designed places
- Chapter 13 – Protecting Green Belt land

- 5.7 The NPPF post-dates both the adopted Core Strategy and the Local Plan. However, paragraph 219 of the NPPF sets out that existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of this Framework. Due weight should be given to them, according to their degree of consistency with this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given).

Supplementary Planning Documents

- 5.8 Of specific relevance is the Bovingdon Airfield Area Based Policies SPG 2004 which identifies the Green Belt designation and indicates that the derelict condition of the site will not be taken as general justification for inappropriate development in the Green Belt.
- 5.9 In terms of the main airfield Policy 2 of this document specifies that: The area immediately surrounding the air traffic navigation beacon will be safeguarded from development and careful attention will be paid to the height restrictions over the remainder of the safeguarding zone in consultation with the Civil Aviation Authority
- 5.10 NATS were consulted on the original planning application and no objection was raised to the proposed development at the height shown. This is because they were satisfied that the proposed development would not affect the function of the beacon in relations to its air traffic control function.
- 5.11 With no change proposed to the height of the existing building we do not anticipate any objection in this regard, with no resulting conflict with the intention of Policy 2 of the SPG.

Emerging Planning Policy

- 5.12 Dacorum Borough Council is in the process of preparing a new Local Plan for 2020 – 2038. Once adopted, it will replace the Core Strategy, the saved policies of the Local Plan and the Site Allocations Development Plan Document.
- 5.13 The Dacorum Local Plan Emerging Strategy for Growth was consulted on between November 2020 and February 2021. This contained the emerging Bovingdon Delivery Strategy which makes specific reference to the airfield, and states that the plan will support the principle of film and television production on the land subject to the normal Green Belt considerations.

5.14 Emerging Policy DM40 provides further information with regard to the airfield and identifies that the airfield has established itself as a location for film and television productions. The supporting text to DM40 identifies the importance of such activities and the contribution it makes to the UK film and television industry and local economy.

Policy DM40 - Bovingdon Airfield

1. *The Council will support the principle of filming, television and related production at Bovingdon Airfield where the applicant can demonstrate that the proposal:*
 - a. *minimises its impact on the Green Belt and the wider landscape of the airfield;*
 - b. *supports local economic and social benefits;*
 - c. *is for temporary studios, stages and sets, ancillary storage, office and crew buildings and associated plant and machinery;*
 - d. *is acceptable in terms of its transport impacts and allows safe and convenient access for all construction vehicles, crew and visitors;*
 - e. *limits a wide range of environmental impacts (e.g. lighting, glare, noise, ecology etc.), particularly on the amenity of nearby residential properties;*
 - f. *carefully controls the heights and siting of buildings and other structures;*
 - g. *is restricted to existing hardstanding areas; and*
 - h. *does not interfere with the safe operation of the NATS navigation beacon.*
2. *In each case the Council will need to consider whether the proposal is:*
 - a. *not inappropriate development; or*
 - b. *demonstrates very special circumstances.*
3. *The acceptable area for filming and television production is shown on the Policies Map.*

4. The derelict condition of the site will not be taken as general justification for inappropriate development in the Green Belt.

5.15 While this policy is emerging and currently carries very little weight in the decision-making process, it does provide an indication of the direction of policy towards film development at the airfield, in particular the preference for temporary studios.

5.16 This application, however, seeks planning permission on a permanent basis and, having regard to the particular circumstances of this application including the continued demand for high quality studio space and the benefits that the retention of this studio would have locally and in terms of its contribution to the UK film industry, we contend that very special circumstances exist to justify the retention of the existing studio on a permanent basis.

6 PLANNING CONSIDERATIONS

6.1 The principle of development

6.2 The site is in the Green Belt, outside any village settlement, where both the NPPF and Core Strategy Policy CS5 identify the construction of new buildings as inappropriate development except for a number of identified exceptions.

6.3 The erection of buildings for commercial film making does not fall within one of the identified exceptions and, although the site is previously developed land, we accept that the proposed development would have a greater impact on the openness of the Green Belt in this part of the site than the former airfield use.

6.4 As such, we accept that Dacorum Borough Council will find the proposal to be 'inappropriate development' in the Green Belt.

6.5 The NPPF identifies at paragraph 147 that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

6.6 Paragraph 148 goes on to state that, when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt.

6.7 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.

6.8 In this case, we contend that the harm resulting to the Green Belt from the permanent retention of the existing studio building is clearly outweighed by the economic benefits that the development would bring and our case for very special circumstances is set out below.

6.9 Impact on the Green Belt

6.10 We accept that the proposal is inappropriate development in the Green Belt, and that this will be ascribed substantial weight, as required by the NPPF.

- 6.11 We also accept that harm will result from the permanent retention of the studio building on part of the former runway where there was not previously any built form. This is from the building itself, which, given its large size both in floor area and height, has a significant presence.
- 6.12 It is, however, situated on a previously developed part of the site. This lessens the impact as the development would not result in any encroachment beyond the existing runway hardstanding and would be seen in the context of the approved use. As such, the proposal does not conflict with any of the purposes of the Green Belt.
- 6.13 While the airfield is situated in a countryside location for planning purposes, the countryside here is not open on account of the use of the site, its characteristics and proximity to existing development. As such, the development would not result in any encroachment of built form onto 'open countryside'.
- 6.14 Furthermore, it would not result in any significant harm to the visual amenities of the Green Belt given its situation within the airfield site, limited public view and presence of existing vegetation. This is clear as the building exists and thus its actual impact can be seen, on the ground.
- 6.15 As can be seen on site, the existing building sits below the existing tree line and, despite its size, is neither prominent nor dominant in short or longer distance views. Cladding the building green has further lessened its visual impact, with the building seen against the backdrop of existing vegetation.
- 6.16 Retaining the building in its current location would ensure that the development is sited close to recently permitted studio space and HMP The Mount, thereby keeping development close to existing built form and concentrating studio space in one location.
- 6.17 Very special circumstances
- 6.18 Whilst we accept that the proposal will result in harm to the Green Belt by reason of inappropriateness and from the retention of what is, a large building, we contend that the economic benefits resulting are sufficient to clearly and demonstrably outweigh the identified harm identified.

- 6.19 In addition to the economic and social benefits, which are set out below and within the accompanying '*Report on Economic and Social Benefits Associated with the Film Studio Development*' statement accompanying this application, consideration should also be given to both permitted development rights for filming and the recent approval for film making at the site.
- 6.20 Starting with the recent approval, this establishes the principle of using the site, on a permanent basis, for film making. The Council has accepted this use, and, in accepting this use, it can be expected that television and film producers using the site will require studio space. Indeed, 20/03194/MFA included the provision of three permanent studios, two of which had been previously erected under permitted development rights.
- 6.21 The application studio already has temporary consent until 2023. Demand, however, is such that ITV would like to retain this space both for its own productions and to meet the needs of external production companies. This is required in addition to the three studios recently approved, with demand outstripping available studio space at both a local and national level. This is due to the increasing popularity of Bovingdon and the UK as a whole, as a location for film production.
- 6.22 Ongoing and sustained demand for filming at Bovingdon is evidenced from the planning history for the wider airfield site and demand for use of this particular studio building.
- 6.23 Permitted development rights could be used to meet the need for studio space, and this has been relied upon in the past to facilitate filming at the site, with permitted development rights allowing for structures up to 15m in height.
- 6.24 However, repeated set build and strike is not efficient in terms of time or cost and does not give the applicant the certainty they require in terms of access to studio space and production planning. It is also not sustainable in terms of the traffic generated and the movement of, often large structures and associated welfare facilities, on and off the site.
- 6.25 Therefore, recognising the ongoing demand for the studio space at Bovingdon and recognising unmet need for studio space nationally, permission is sought for the scheme as submitted.
- 6.26 In support of this application and as evidence of demand for the additional studio space letter of support will be provided by Creative England, ITV and the British Film Commission.

6.27 Economic benefits

6.28 Weighing in favour of this application is the significant economic benefit it will bring. The NPPF is clear that planning decisions should help create the conditions in which businesses can invest, expand and adapt and significant weight should be placed on the need to support economic growth and productivity (NPPF paragraph 81).

6.29 Looking at the specific economic benefits:

6.30 The global film and television industries have grown annually over the last decade indicating a high demand for production space. The introduction of additional permanent filming space at Bovingdon and adding to the variety of facilities it can offer will be highly useful in servicing a range of potential clients and their specific requirements.

6.31 The Government set out in 2018 that the Creative industries is a priority for targeted investment and paragraph 83 of the NPPF sets out that 'decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries'. The proposed development would serve a creative industry and its approval would add to the existing cluster of film production facilities available at Bovingdon.

6.32 It is understood that the Government is committed to protecting the Green Belt. However, a lack of studio capacity is hindering the industry's growth and the provision of a further permanent studio at Bovingdon would provide an opportunity to counter this shortage and further expand the industry throughout the UK.

6.33 It will offer further production space in the area surrounding London, and an alternative to Pinewood and Leavesden studios which are fully let and not available to smaller film /TV productions. Development of additional permanent studio space at Bovingdon will further assist to meet the Government's target for the continued growth of the UK film industry.

6.34 This application proposal is therefore a form of business enterprise which accords with the NPPF. The proposal will stimulate local growth and provide financial input directly to the local and national economy.

- 6.35 It has been shown that filming can bring considerable economic benefit. Nationally, there was a £2.84bn spend on film and high end TV production in 2020 and although this was down 21% on 2019's level (due to upheaval associated with the Coronavirus pandemic, which put a stop to film making for the first half of 2020) the final three months of 2020 recorded a £1.19bn spend – the second highest over a three-month period on record (Source: BFI) .
- 6.36 The most recent official figures from the British Film Institute reveal a record £5.64 billion film and high-end TV production spend in the UK in recent years. This is forecast to increase by 90% by 2025.
- 6.37 In terms of local benefits, research has shown that 'location filming' enhances supply chain relationships and safeguards jobs, with an estimated 6,700+ people working in film and associated sectors in Hertfordshire alone. For every job supported in the core UK film industry a further job is supported through indirect and induced multiplier affects.
- 6.38 Location filming also brings about local spend, and as evidenced in the figures provided to the Council in respect of this studio, the impact is significant.
- 6.39 A typical production results in local spend on staffing, hotel facilities, transport, cleaning, security, catering, plant hire, traffic management and waste requirements along with spend in local restaurants and shops. This all helps to enhance the vitality and viability of local services and facilities.
- 6.40 Looking in more detail at the specific benefits of this studio, in 2019, between Dancing on Ice and The Masked Singer, ITV Studios and 3rd party clients spent over £1.3 million in the Bovingdon and Hemel Hempstead area on local filming and related suppliers, local hotels and transport and local crew.
- 6.41 In 2020, despite the pandemic, this figure was £1.46million.
- 6.42 These figures, and a detailed breakdown, can be found in the information setting out the 'benefits to the local area' of the existing studio, provided to the LPA under the requirements of Condition 3 of 4/01152/18/MFA. These are attached at Appendix 1 of the accompanying 'Report on Economic and Social Benefits' document and demonstrates significant economic and social benefits associated with the use of the

studio for filming activity in 2020 and 2019. It is reasonable to assume that similar benefits will continue if the studio is granted permanent consent.

Dry Hiring

6.43 The Studio is, and will continue to be, also available for dry hire to other film and television companies. Dry hire is where the space/ venue only is hired. Dry hiring has proved immensely popular, (and largely due to the provision of studio space for short term hire for smaller productions). Dry hiring represents potential additional economic and social benefit to the permanent retention of this studio.

6.44 Local Employment

6.45 As well as continuing to spend money in the local area, ITV continue to develop their relationship with the local community and employ local staff and suppliers as part of the shows which use the studio at Bovingdon.

6.46 The development of the film studios at Bovingdon Airfield has resulted in the creation of 2 no new full time jobs. These include :

- ITV Studio Manager . Employed on site within the ITV offices
- Bovingdon Airfield – Location manager

6.47 As demonstrated in Appendix 1, both Dancing on Ice and The Masked Singer have sought to proactively employ people from the local area for roles in security, transport, cleaning, catering and on the ground facilities teams. With local firms providing maintenance support to the studio site. ITV will continue to invest in local employment.

6.48 At Appendix 2 we include a list of local suppliers / staff. This includes Birkin Cleaning Company, Eat to the Beat Catering, SRM Security and AC Hobbs for repairs and groundworks.

6.49 It is clear that the presence of a permanent studio building on the site would bring about significant economic benefits to the local area from local spend alongside enhancing local employment. These are significant benefits that weigh in favour of the proposal.

6.50 **Social Benefits/ Community Engagement**

6.51 Alongside the significant economic benefits there are a range of social benefits that also weigh in favour of this application. These are set out in detail in the accompanying 'Economic and Social Benefits of Filming' document that accompanies this submission and are summarised below:

- Community Liaison role
- Work experience programme offered by ITV
- Masterclass from ITV industry professionals
- Tour of Studios by ITV
- Skills/ Work Placement Plan by Independent Production Companies
- Production Tickets provided by ITV to local groups
- Donation of Ex Props to Charity by ITV

6.52 The existing presence of ITV studios on site have realised a number of social benefits for the local community to date. ITV are committed to maintaining these benefits and further engaging with the local community to provide a broader spectrum of benefits. ITV will also encourage Independent Production Companies to offer similar social benefits to the local community.

6.53 In combination the social and economic benefits of the development weigh heavily in favour of the proposed development and provide Very Special Circumstances.

6.54 **Securing Social and Economic Benefits**

6.55 The Applicant recognises that the LPA, in line with the temporary permission for the site (planning application 4/01152/18/MFA) may wish to secure the continued evidencing of the associated benefits of filming.

6.56 The Applicant is willing to commit to the continued submission of yearly statements setting out the specific benefits of the studio building's presence on the local area. This can include benefits such as breakdown of local spend, local employment initiatives and

results, involvement with local community and school as well as any other benefits arising from filming.

6.57 The LPA have previously secured this by way of a suitably worded condition attached to the temporary planning permission 4/01152/18/MFA. We suggest that a similarly worded condition can be imposed by the LPA for this application.

6.58 If deemed more appropriate, the applicants are willing to enter into a Section 106 legal agreement to ensure Social and Employment benefits continue to accrue from this development.

6.59 **Other relevant considerations**

6.60 Design, visual amenity and impact on character and appearance

6.61 The building has been designed to serve its function and is utilitarian in nature. In the context of a former airfield, this is not out of keeping.

6.62 The building is clearly sizable. However, on account of its colour, existing and proposed landscaping associated with 20/03194/MFA), its siting close to existing and additional consented studio buildings and its context, seen in relation to large buildings at HMP The Mount, the building will have a neutral impact on the character and appearance of the wider area. As such the proposal is considered to comply with Core Strategy Policies CS11 and CS12

6.63 Impact on neighbour amenity

6.64 On account of the design of the studio building (with no windows), the single storey nature of the production space, the distance to the nearest neighbour (HMP The Mount) and intervening vegetation, it is the case that the proposed development would result in no loss of light, privacy or overbearing impact.

6.65 In terms of noise, filming itself is not a noisy activity and activity would take place inside the building, minimising its impact. In the context of a former airfield which is still used by aircraft as well as a regular large-scale market and driving experience track days, the noise associated with the use, including that generated by comings and goings associated with the use, would not result in any unacceptable harm to neighbouring residents, who are located some distance away.

6.66 We are also not aware of any noise complaints associated with the use of the existing studio and understand that a Noise Management Plan has been conditioned as part of the use of the land on which the application building sits.

6.67 Highway and parking considerations

6.68 Parking in association with the use will continue to take place on the runway, as existing.

6.69 The cumulative impact of the existing studio, in addition to existing uses and the recently approved studios and permanent film making use, would have been considered by the County Highway Authority when determining 20/03194/MFA.

6.70 When determining this application, the access arrangements were found acceptable and subject to filming not coinciding with Bovingdon Market (which can be controlled by condition) it was concluded that highway capacity would not be adversely affected. In any event, it is the case that the market will be closed within 18 months of 20/03194/MFA being approved – as required by the associated S.106 agreement.

6.71 We therefore do not anticipate an objection on highway safety, capacity or parking grounds

7. CONCLUSION

- 7.1 The retention of the existing studio and associated production space represents inappropriate development in the Green Belt. However, in this case, the benefits of the scheme clearly and demonstrably outweigh the harm which has been identified.
- 7.2 In the context of this proposal, we contend that the only harm is that resulting to the Green Belt, with the application found acceptable in terms of its impact on the character and appearance of the area, neighbour amenity and highway safety.
- 7.3 We accept that inappropriate development is, by definition, harmful to the Green Belt and that substantial weight has to be given to this harm. The actual harm to the openness of the Green Belt and its purposes is, however, limited by the location of the proposal on previously developed land, within an area consented for film making, where no encroachment of built form would result into 'open countryside' and where the visual amenities of the Green Belt would not be significantly impacted.
- 7.4 Against this harm is the significant benefits that the proposal would bring to the local and national economy. The film making industry in the UK is growing and demand currently outstrips supply for studio space. The retention of the existing studio on a permanent basis would allow ITV and other producers to access high quality studio space and to continue with the planning and production of popular shows and new productions.
- 7.5 The benefits of this particular studio to the local economy have been evidenced with the annual submission to the Council of local spend by ITV, as required by condition 3 of planning permission 4/01152/18/MFA. This figure (£1.48mn in 2020) is significant and contributes both directly to the vitality and viability of many local jobs and services. The indirect 'spin off' benefits have not been quantified (for example spend by staff put up in local hotels on local restaurants, pubs, shops, cafes etc) but also weigh in favour of this proposal.
- 7.6 In addition to the local economic benefit, is the benefit provided to the UK economy by the film and television sector. This proposal would support a growing sector that provides significant input into the economy and is specifically identified for support by the NPPF.
- 7.7 The proposal will also bring about a range of social benefits to the local area. This includes through work experience opportunities, the intention to establish connections

with the local college alongside to provide 'master classes' provided by television/ film industry professionals, gifting show tickets to local groups/ charities alongside many more such that the proposal will bring about significant social benefits that will positively impact the local area and weigh in favour of the proposal.

- 7.8 Overall, it has been demonstrated that the retention of the studio would generate employment, bring significant spend into the local economy and support the growth of the UK film industry, which currently suffers from insufficient studio space to keep up with demand. The proposal will also bring about a broad spectrum of social benefits which will positively impact the local area. The benefits demonstrated are considered to attract substantial weight and, in our opinion, clearly and demonstrably outweigh the limited actual harm identified to the openness and purposes of the Green Belt.
- 7.9 We therefore respectfully request that planning permission is granted, without delay, for the development proposed.