

Rowley Lane, Borehamwood New Hertsmere Local Plan

‘Call for Employment Sites’ 2021

Legal & General Assurance Society Limited on behalf of ReAssure
Ltd

March 2021

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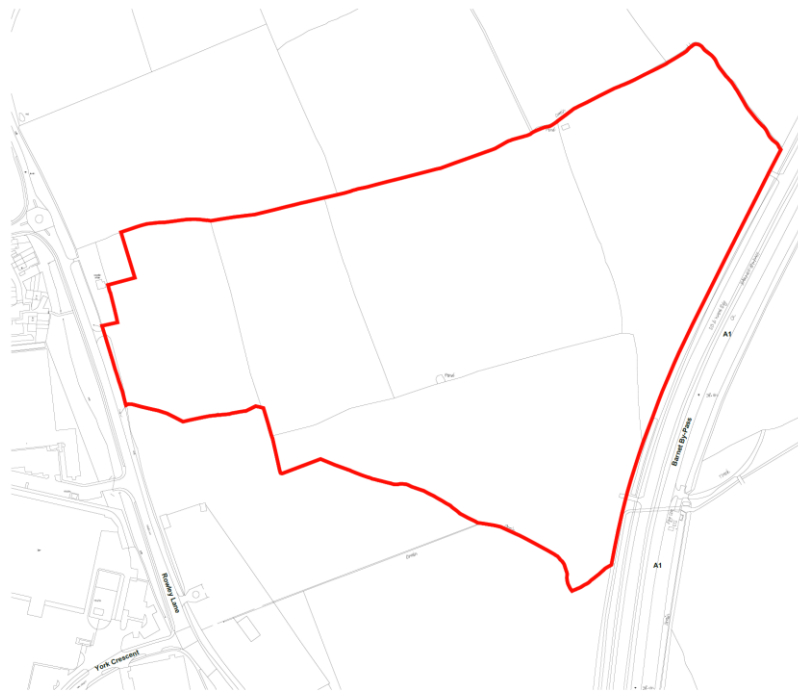
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1.0 Introduction

- 1.1 On behalf of our client, Legal & General Assurance Society Limited (“L&G”), we are pleased to have the opportunity to respond to Hertsmere Borough Council’s (“HBC”) new ‘Call for Employment Sites’.
- 1.2 L&G manages a 15 hectare area of land to the east of Rowley Lane, Borehamwood (“the site”) (as shown in Figure 1.1), on behalf of the landowner, ReAssure Limited.

Figure 1.1 Site plan



Source: UMC Architects

- 1.3 Lichfields submitted representations on behalf of L&G in relation to the site to the ‘Potential sites for housing and employment’ document in December 2018. These representations are enclosed at Appendix 1.
- 1.4 Details relating to ownership, current use, physical characteristics and constraints and timescales for development are set out in the completed Call for Sites Site Questionnaire which accompanies this submission.
- 1.5 The site was included as a potential site for employment (EMP3) in the ‘Potential sites for housing and employment’ document and is referred to in the Housing and Economic Land Availability Assessment (“HELAA”) published in 2019.
- 1.6 As outlined in section 2.0, construction on land to the south of the site is now underway to build a new film/production studio development, to be known as Sky Studios Elstree. This submission outlines the need case for, and suitability of, the remainder of the L&G site to be allocated for further employment/TV and film studio development and therefore its removal from the Green Belt.
- 1.7 It is envisaged that the site could be developed in a similar way to the adjacent Sky Studios scheme.

- 1.8 The remainder of this Call for Employment Sites submission comprises the following sections:
- Section 2.0 provides the background to the site, including planning history;
 - Section 3.0 assesses the overall requirement for additional employment land in Hertsmere;
 - Section 4.0 outlines the need for additional TV and film related development, with particular reference to findings in the South West Hertfordshire Economic Study Update (2019);
 - Section 5.0 assesses the site's suitability for employment/TV and film studio development; and
 - Section 6.0 provides our conclusions.

2.0 **Site background**

2.1 This section briefly outlines the background of the site, both in terms of existing designations and planning history.

Site characteristics

2.2 As noted above, details relating to the physical characteristics and constraints of the site are set out in the completed Site Questionnaire which accompanies this submission.

2.3 In summary, the site is generally flat and there are no overriding physical constraints to development. The South West Herts Economic Study Update (2019) notes the following in terms of the site's physical characteristics and its suitability for development:

“The majority of the site is currently undeveloped as it is Green Belt land. The topography is relatively flat and there is some vegetation, yet this is unlikely to impact development ... there are various options to address [access] through the delivery of an access road from Rowley Lane or as a second phase to land being developed directly to the south. The site is well positioned within close proximity to the A1 which provides strong connections to the M1 and M25 motorways. As identified above, this level of access connects the site to Greater London and markets across the nation.” (paragraphs D.121 – D.122).

In addition, the HELAA (2019) notes that the site is *“well positioned strategically, with strong access to the motorway network and labour pool”*.

Relevant site designations

2.4 The southern part of the wider L&G site is identified as safeguarded land for employment development under Policy SADM9 of the adopted Site Allocations and Development Management Policies document, which was adopted in 2016. It is outside the Green Belt.

2.5 The northern part of the L&G site, which is subject to these representations, remains designated as Green Belt land.

2.6 The representations made on behalf of L&G to the 'Potential sites for housing and employment' (enclosed at Appendix 1) outline how the site had been assessed in the (then draft) Stage II Hertsmere Green Belt Assessment. We summarise three of the key findings of the Stage II Hertsmere Green Belt Assessment – Final Report (March 2019) in respect of the site below.

- 1 The Green Belt Assessment scores each sub-area against the purposes of the Green Belt, as set out in the National Planning Policy Framework. The site does not score highly for any purpose; it scores moderately against some purposes and poorly on others (see Appendix 1).
- 2 The site is located adjacent to the large built up area of Borehamwood, and is adjacent to an area already released from the Green Belt ie the southern site now being developed.
- 3 The A1 forms a defensible feature which restricts the outward growth of Borehamwood.

Planning history

Expired planning permission for Centre for Sporting Excellence

- 2.7 An outline planning permission granted in 2016 covered most of the wider L&G site and permitted a mix of sports and employment uses comprising pitches, sports hall, sports academy, hotel/hostel, office/commercial and research buildings and parking.¹
- 2.8 This planning permission was not implemented and has now expired.

Sky Studios Elstree

- 2.9 Full planning permission was granted in September 2020 for the development of film/production studios on the southern part of the L&G site.² The scheme comprises a total of 54,391 sqm (GIA) floorspace, within new sound stages, production support buildings and a reception/admin centre. The development is to be known as Sky Studios Elstree.
- 2.10 The development will deliver a major large-scale purpose-built studio facility, providing flexible space for large TV and film productions. The Sky Studios Elstree development will contribute meaningfully towards objectives for economic growth and employment generation that are set out in the NPPF, representing a significant new capital investment into a high value, growing sector of the economy, which will help to raise the overall levels of economic activity in the local and wider impact area.
- 2.11 Sky Studios Elstree is envisaged to deliver a number of significant economic benefits to both the local and regional economy which were set out in the planning application. This includes supporting 929 person-years of construction employment over the build period. During its operational phase, the proposed development is expected to support above 1,500 FTE jobs and generate £720 million gross value-added contribution to UK GDP per annum.
- 2.12 All pre-commencement conditions have been discharged and work has started on site to implement the project. The entire scheme is being built out as one development (as opposed to in phases as demand justifies development). This demonstrates that there is a pressing need for new film/production studio space in this area. Sky Studios Elstree is expected to be operational in 2022.

¹ Ref. 14/1735/OUT, granted on 26 February 2016.

² Ref. 20/0315/FULEI, granted on 2 September 2020.

3.0 Employment land requirements

- 3.1 L&G's representations to the 'Potential sites for housing and employment' (enclosed at Appendix 1) summarised the employment land requirement in Hertsmere. These representations noted that the Council's preferred 'employment led' growth scenario is to achieve B-class job growth in Hertsmere from 2013 to 2036 of 13,800. The Council needs to identify suitable sites in the new Local Plan to accommodate this level of growth.
- 3.2 As noted above, HBC has since published the 2019 HELAA. The HELAA provides an overview of Hertsmere's housing and economic land supply to meet the borough's future development needs.
- 3.3 Paragraph 5.2 summarises notable strengths in South West Hertfordshire, as follows:
- 1 *"High rates of enterprise: highest business start-up rate in SW Herts, 22 new businesses per 1,000 working age people in 2016.*
 - 2 *Good transport connections: well-connected strategic road network, with A1 (M), M1 and M25. Along with notable rail links at Borehamwood, Radlett and Potters Bar.*
 - 3 *Strength in TV and Film production: High concentration in creative industries with high LQs in publishing, broadcasting, arts and entertainment."*
- 3.4 The latter two points above are of particular relevance to the L&G site. In terms of point 2, the site has excellent access to the strategic road network, with the A1 running along the site's eastern boundary. The site also benefits from its proximity to Elstree and Borehamwood train station (30 min walking distance or 9 min cycle distance). In terms of point 3, Sky Studios Elstree will clearly build on and enhance the strength of the TV and film sector in Hertsmere and South West Hertfordshire.
- 3.5 Paragraph 5.4 states that available industrial floorspace in Hertsmere is estimated to be 61,530 sqm, with demand being calculated at 81,900 sqm – indicating a shortfall of over 20,000 sqm. Paragraph 5.4 also refers to a very low vacancy rate in 2018 of 2.9%. Such a low vacancy rate means there is less flexibility in the market, meaning businesses potentially have less opportunity to expand or downsize as their requirements change.
- 3.6 This shortage of employment land is also noted in the South West Herts Economic Study Update, which identifies a shortage of such land, particularly in London fringe areas which is acting as a constraint on growth and investment. The loss of employment land to residential uses has put particular pressure on supply in some areas and means it is difficult to attract businesses which might be displaced from London (paragraph 4.25).
- 3.7 Paragraph 6.4 of the Economic Study Update states:
- "With such limited space available, it will be very difficult to accommodate demand for even modest amounts of space. There is therefore a significant danger that the FEMA will lose out on potential investment. There may also be knock-on consequences for productivity if local businesses are dependent on a supply of local storage and distribution facilities for their supply-chains."*
- 3.8 Paragraph 5.11 of the HELAA reiterates this buoyant demand for employment floorspace in Hertsmere, noting:

“As part of the SW Herts Economic Study, an assessment was conducted that analysed all of the existing employment sites, along with all of the potential employment sites (excluding car parks) that had been submitted at the time. The report concluded that current employment spaces are trading well and have high levels of occupancy, and that market demand for these sites appears to be strong. The only site that was identified to have significant supply of vacant space was at Cranbourne Road. Meaning that there were very limited opportunities for redevelopment or intensification within existing sites.”

- 3.9 The above outlines the context of employment land need in the borough, both in terms of the strong demand for existing space and there being limited opportunities for redevelopment or intensification within existing sites. There is a clear requirement to allocate new sites for employment development as part of the new Local Plan.

4.0 **Need for additional TV/film/production studio development**

4.1 This section outlines the need for additional film/production studio development in Hertsmere.

4.2 As noted in section 2.0, planning permission has been granted for a significant film/production studios development of 54,391 sqm on the southern part of the wider L&G site. This will deliver a range of economic and social benefits to Hertsmere and the surrounding area. The Sky Studios Elstree development will provide a significant amount of floorspace for an identified end user, and as such that new capacity being created is already fully accounted for and so there remains an additional need for TV and film related development in South West Hertfordshire, as outlined below.

Overall need

4.3 Within the creative industries sector, ‘Film, TV, video, radio and photography’ is the second largest contributor to UK GVA and in 2017 accounted for £16.7 bn of the UK economy, up 8.9% since 2016 and with a growth rate almost twice that of the overall UK economy.³

4.4 Within the TV and film sector, just over half of UK production spend in 2019 originated from film. The total spend on film in the UK in 2019 was £2.0 billion. This figure has increased by 104% over the course of the last decade (£1 billion in 2009),⁴ driven primarily by inward investment which currently accounts for 89% of film spending (£1.7 billion).

4.5 High-end television (“HETV”; productions costing more than £1 million per episode) production spend in the UK is also growing rapidly.⁵ The total spend on HETV in the UK in 2019 was £1.7 billion, a 29% increase from 2018, and the highest since reporting began. As with film, inward investment accounted for the vast majority of the overall increase. Inward investment on UK HETV production currently accounts for 78% of all spending, which is 51% higher than in 2018.

4.6 Given the above, studio space is becoming increasingly limited, especially in Greater London, a location which is key for attracting large scale TV and film productions into the UK. Many of the larger studio facilities such as Pinewood, Shepperton and Leavesden have been operating at full capacity for years as evidenced by their recent planning applications for proposed development in order to extend existing studio footprints to cater for increased demand.

4.7 In summary, the following factors demonstrate the need for additional TV and film related development:

- 1 The UK film and high-end television production industry is growing rapidly;
- 2 South West Hertfordshire, in which Hertsmere and the site are located, has a rich film heritage;
- 3 Analysis undertaken by Lambert Smith Hampton in 2018 confirmed that there is a requirement for between 1.6 – 1.9 million sq ft of new film studio space in the next 15 years;⁶
- 4 Given rapid growth in this industry, demand for studio space has increased and placed a strain on existing facilities;

³ UK Government, DCMS (2019), Sectors Economic Estimates 2017 (provisional): Gross Value Added.

⁴ UK Film Council (2010), UK Film Council Research and Statistics Unit: Film production in the UK: Full Year 2009 Report.

⁵ BFI (2020), BFI Research and Statistics Unit: Film, high end television and animation programmes production in the UK: full year 2019.

⁶ LSH (2018), Sites, Camera, Action: The UK Film & TV Studio Property Market 2018.

- 5 Greater London offers a number of benefits that are critical for large scale productions. This is due to the number of benefits the area can offer including: the close location of a film and HETV supply chain, access to cutting edge technologies and ultra-fast fibre networks and strong transport links provided by proximity to international Heathrow Airport which means that productions can tap into global talent at a relatively low cost and effort; and
- 6 It is clear that the UK Government hopes that the UK TV and film industry will play a key role in the UK's economic recovery from the impacts of Covid-19. The Department for Digital, Culture, Media and Sport launched a £500m scheme to help the industry in July 2020.⁷

4.8 Therefore, even accounting for the Sky Studios Elstree development once operational, there remains a significant quantitative need for new film/production space and South West Hertfordshire is a key location that can help meet this need.

Synergy with Sky Studios Elstree and other nearby Studios

- 4.9 Given construction is underway on Sky Studios Elstree and the project is expected to be operational in 2022, there will be a number of key benefits in locating additional film/production studio space in very close proximity. This is a unique site characteristic which gives significant weight for its release from the Green Belt.
- 4.10 As noted above, the site is located in South West Hertfordshire, a region well known for its rich film heritage courtesy of Leavesden Studios and Elstree Studios. Elstree and Borehamwood is already a focus for similar development, with Elstree Studios on Shenley Road and the BBC Elstree Centre on Eldon Avenue. At a local level, HBC has acknowledged the important economic contribution made by the TV and film sector in its Economic Development Strategy, 'Creative Hertsmere', which sets out the Council's vision for a vibrant and prosperous economy, underpinned by creativity and enterprise with a particular focus on the film and television industry.
- 4.11 Sky Studios Elstree will build on this rich history of TV and film heritage within the local area. Sky will work closely with the existing local studios as well as the wider community to further support Elstree as a key part of the UK creative industry. Additional studios space on the site to the north would further strengthen these links and help to cement the local area as the UK's premier TV and film studios location.
- 4.12 Hertsmere's proximity to London provides a number of benefits, for example access to marketing agencies, visual effects and post-production specialists like those located in Soho, strong international transport connections, and access to the capital's significant workforce. As a highly creative industry, co-locating studio production space is likely to encourage further inward investment.
- 4.13 Development of the site for TV and film related development could also help to maximise a range of operational and sustainability benefits, given the clustering of these specialist facilities in Elstree/Borehamwood together with Elstree Studios and the BBC Studios. As an example of the wider public benefits that arise from this concentration of facilities, as part of the Sky Studios Elstree project, a bicycle hire scheme is proposed which will encourage cycling between Elstree & Borehamwood railway station and the site (and elsewhere in Borehamwood). Sustainable transport initiatives, including an electric shuttle bus are also proposed. These could be expanded to increase the accessibility of the site by non-car modes.

⁷ Evening Standard, 'Government announces £500m scheme to kick-start film and TV production', <https://www.standard.co.uk/news/uk/film-tv-production-coronavirus-fund-ps500m-goverment-a4510976.html>

Bespoke film/production studio requirements

- 4.14 It should be noted that film/production studio developments typically contain large soundstages, with a range of supporting facilities. As such, film/production studio developments can be more land-intensive than other employment uses.
- 4.15 As production budgets have increased, film and HETV productions are becoming increasingly larger-scale and complex operations. These productions require bespoke production facilities which can operate at scale. Flexibility is key, as well as the close proximity of all major production facilities (i.e. studio facilities must provide a ‘one-stop-shop’).
- 4.16 A recent Pinewood report identified several key elements in the studio space specification for modern large-scale film and HETV productions.⁸ This included large sound stage sizes of 30,000 square feet or more, with enhanced height clearance to allow for larger sets; a generous provision of production support space including backlots and base camp; the capabilities to house streetscapes within the studio complex; and a robust digital and physical security network.
- 4.17 It is therefore clear that TV and film related development has bespoke site requirements. It is important that planning authorities seek to identify suitable, large sites that can accommodate this scale of development, to support the requirements of the sector and realise the spin off benefits it will bring.

Contribution to economic objectives

- 4.18 The intention to support the TV and film sector is established in adopted HBC planning policy. Hertsmere Core Strategy Policy CS11 (‘Promoting film and television production in Hertsmere’) confirms that the Council will support proposals relating to film and television production.
- 4.19 The South West Hertfordshire Economic Study Update (2019) identifies a functional economic market area (FEMA) made up of Dacorum, Hertsmere, St Albans, Three Rivers and Watford. The report provides an update on the 2016 report, which aimed to provide:
- An understanding of the functional economic market area and relevant policy context;
 - An objective assessment of long-term employment land and premises needs over the period 2018 to 2036, and the current and future supply of employment land; and
 - Possible local authority planning and strategic economic development responses, including the quantum, location and type of jobs and land use allocations required to meet these identified needs.
- 4.20 The Economic Study Update notes that the districts of South West Hertfordshire have specific sector strengths, highlighting the TV and film sector in Hertsmere and Three Rivers as an example. The Update notes that:
- “A key priority for Hertsmere is to capitalise on the expected growth in film and TV production over the next twenty years. Lambert Smith Hampton estimate that the UK will require between 1.6 and 1.9 million sq ft of additional film studio space by 2032 if recent growth rates are sustained. Given that the FEMA is home to two major studios (in Hertsmere and Three Rivers), South West Herts is well positioned to capture this growth if sites can be identified.*”

⁸ Pinewood (2013), Pinewood: The Case for Expansion.

Hertsmere BC could also look to maximise the potential supply chain and employment benefits of this growth for Hertsmere residents and businesses (eg supporting the Elstree University Technical College which is an industry school for the Creative Production Arts). Previous supply chain studies for film and TV production have identified significant expenditure on digital technologies and hospitality, and strong synergies with a number of other creative industries, including the arts, media, publishing, advertising and design.” (paragraphs 5.85 and 5.86).

4.21 The Economic Study Update concludes the TV and film studios in Hertsmere and Three Rivers are key assets for South West Herts’ creative industries. The forecast growth in demand for studio space presents significant opportunities to generate more value from these sectors (paragraph 10.5). The growth of established sectors, such as TV and film production, is key to addressing productivity challenges in South West Hertfordshire (paragraph 10.7). The main barrier to growth in established sectors such as has been “*a shortage of high quality business premises to attract investment*” (paragraph 10.8).

4.22 It is clear that the new Hertsmere Local Plan offers an opportunity to allocate suitable land for TV and film production related development, to meet the forecast growth in demand for studio space identified in the Economic Study Update and elsewhere.

Socio-Economic Benefits of the Allocation

4.23 On the assumption that development of the site would be similar in nature and scale to the Sky Studios scheme, there are a range of potential socio-economic benefits that can be anticipated, as summarised below:

- In the region of 1,500 full time equivalent (“FTE”) direct jobs in TV and film production;
- Further direct jobs from studio operations;
- Net additional FTE indirect and induced jobs generated within Hertsmere and the Hertfordshire LEP;
- The contribution of over £300 million net additional GVA annually in the Hertsmere economy, as well as wider economic benefits both for Hertfordshire and nationally;
- Supporting over £100 million in annual tax revenues;
- Employment opportunities would be provided and encouraged for local residents (including exploring training, work experience and apprenticeship schemes);
- Opportunities to provide training programmes for young people, with potential for collaboration with local further and higher education providers; and
- Procurement opportunities to be encouraged for local businesses to source products and services during the construction phase.

4.24 The allocation would therefore accord with the economic objectives of the Council as set out in the evidence based documents, including the Economic Study Update, which form the basis of the new Local Plan.

5.0 Site suitability

5.1 The NPPF outlines a requirement for LPAs to prepare strategic policies that make sufficient provision for employment development (paragraph 20). Paragraph 23 notes:

“Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area”.

5.2 In the context of overall employment land need outlined in previous sections, this section considers the site’s suitability for allocation for employment/TV and film studio development.

5.3 Table 8.11 in the Economic Study Update confirms that the site is potentially suitable for B1, B2 and B8 development i.e. a range of employment uses. The Economic Study Update goes on to note of the L&G site:

“The location of the site is an asset attractive to a mix of local and strategic industrial uses. However, demand for employment land development will likely be long term as the safeguarded land south of the site would likely come forward for delivery first. Given the flooding constraints, approximately 90% of the site is developable for employment land. The site requires the delivery of a local road network and supporting utilities infrastructure.

Conclusion: The site is well positioned strategically with strong access to the motorway network and labour pool which will likely attract investment from both local and strategic industrial markets. However, the site is currently Green Belt and located north of an existing safeguarded site, meaning the likelihood of development is long term. Any form of development would be a natural extension from the existing Elstree Way Employment Area.” (paragraphs D.125 and D.125).

5.4 The above confirms that the L&G site is well located strategically to provide additional employment development. The site’s close proximity to the Sky Studios Elstree development means that it is ideally placed to contribute to the strategic economic objectives outlined in the Economic Study Update. It is the optimum location in Hertsmere, of an appropriate scale, to meet the needs identified above.

5.5 Although the Economic Study Update refers to the development of this site in the long term, it is clear that its development potential should be recognised in the Local Plan which will run to 2036. In addition, this view on timescales has been overtaken by events on the site to the south. The Sky Studios development will operational in 2022 and there is a clear need for additional space over and above that being provided for Sky.

5.6 There are clear public benefits in clustering specialist facilities in close proximity in Elstree and Borehamwood including the new Sky Studios Elstree. There are limited opportunities for studio growth on existing brownfield land and no alternative sites of sufficient size (15 ha) that can realise these benefits and provide appropriate new facilities. L&G continues to work very closely with Sky who supports the allocation of the site to the north of their site for additional TV and film studio development and agree the need case is clear. Development of this site will maximise the economic benefits for both Hertsmere and South West Herts.

5.7 It is accepted that to meet the need for additional employment floorspace in the Borough some sites will need to be released from the Green Belt. In accord with para 137 of the NPPF it is considered that the above (in addition to the information in Appendix 1) confirms that there are exceptional circumstances exist which justify a change to the Green Belt boundary in this

location. The reasons are similar to those that led to the removal of the site to the south from the Green Belt (initially through the Core Strategy). This is the only realistic site option to meet the need, given the scale of the site, its strategic and sustainable location and the close proximity of the Sky Studios scheme. It is very clear that the need cannot be met on available brownfield land or underutilised sites within the Borough.

6.0 Conclusion

- 6.1 The southern part of the L&G site is subject to full planning permission for a film/production studios facility, to be known as Sky Studios Elstree. Construction work is underway and the development is expected to be operational in 2022. This project will deliver wide-ranging economic benefits. Once it is operational, the proposed development is expected to support above 1,500 FTE jobs and generate £720 million gross value-added contribution to UK GDP per annum. Assuming the northern part of the L&G site is allocated for employment/studio use, we anticipate this would achieve similar benefits for the local economy as Sky Studios Elstree and it would make a significant contribution to the Council's aspiration as part of the new Local Plan to create thousands of new jobs in the Borough.
- 6.2 There is an acute need for additional employment land in South West Hertfordshire and Hertsmere. The South West Herts Economic Study Update (2019), which forms a key part of the evidence base for the emerging Local Plan, recommends that established sectors, such as TV and film production, should be supported and that this is key to boosting economic growth over the Plan period.
- 6.3 As confirmed in the completed Site Questionnaire, the site is available and suitable and there are no constraints to development. As noted in the HELAA, the site is very well positioned strategically, with good transport connections and access to the labour market.
- 6.4 As well as being generally suitable for employment development, the site is the optimum location to accommodate additional film and studio floorspace. Synergies will be created with the adjacent Sky Studios scheme which cannot be achieved on any other large-scale site in the Borough. In overall terms, the site allocation will deliver huge benefits through job creation etc, it will build on the strengths of the TV and film sector in Elstree and Borehamwood and it will allow Hertsmere to capitalise on the expected growth in this sector. The co-location of new TV and film studios will be far more efficient in land use terms and provide a number of benefits in terms of sustainability.
- 6.5 L&G continues to work very closely with Sky who supports the allocation of the site to the north of their site for additional TV and film studio development and agree the need case is clear.
- 6.6 The Council's Green Belt Assessment confirms that the site does not score highly for any Green Belt purpose. It scores moderately against some purposes and poorly on others. The A1 provides a defensible boundary to the east and the site is well located on the edge of Borehamwood urban area. It has been recognised as a potentially suitable employment site in various documents, including the Economic Study Update.
- 6.7 On the basis of the above, we consider that there is an exceptional case to release this site from the Green Belt and for its allocation for employment development, including TV and film studio development. This will allow development to come forward that is consistent with sub regional and local employment objectives.

Appendix 1 Representations to Potential Sites for Housing and Employment document (December 2018)

Rowley Lane, Borehamwood Hertsmere Local Plan

**Consultation on Potential Sites for Housing and
Employment**

Legal & General

December 2018

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1.0 Introduction

1.1 On behalf of our client, Legal & General Assurance Society Limited (“L&G”), we are pleased to have the opportunity to comment on Hertsmere Borough Council’s (“HBC”) ‘Potential sites for housing and employment’ document (“Sites document”).

1.2 L&G controls a 26 hectare area of land to the east of Rowley Lane, Borehamwood.

Figure 1.1 Site Area



Source: Red Box Architecture

1.3 The L&G site is identified as a potential site for employment (EMP3). L&G welcomes the site’s inclusion in the document and seeks the allocation of the entire site for economic development.

2.0 Site Background

2.1 An extant outline planning permission (ref. 14/1735/OUT) covers most of the site and permits a mix of sports and employment uses comprising pitches, sports hall, sports academy, hotel/hostel, office/commercial and research buildings and parking.

2.2 The southern part of the wider site is identified as safeguarded land for employment development under Policy SADM9 of the adopted Site Allocations and Development Management Policies document. Paragraph 3.11 of the supporting text states “*a sports hub or sports centre of excellence is considered appropriate, particularly if it creates new jobs and can be accommodated satisfactorily in its surroundings*”. The extant permission is supported by Policy SADM9 with particular emphasis on generating opportunities for employment use. The permitted range of employment uses, including both commercial and research, can deliver this within the site. As noted in our previous representations on behalf of L&G, the site is available now and, therefore, should be allocated for the delivery of economic development in the short term.

3.0 **Potential sites for housing and employment**

3.1 The L&G site is identified within potential employment site EMP3 in the consultation document. EMP3 comprises the L&G site (referred to as HEL206 in the Sites document), the existing area safeguarded for employment (HEL387) and the northern part of the L&G site which is currently within the Green Belt (HEL376b) (see the site proforma for EMP3 at Appendix 1).

3.2 The Sites document identifies that a significant part of the area is already accepted as an appropriate location for economic development, i.e. land to the south. The land to the north is confirmed in the Sites document as *“a logical extension of existing industrial estate/employment area bringing inward investment to Borehamwood”*.

Employment land requirement

3.3 HBC’s Issues and Options document (published September 2017) states that the Council needs to plan for an additional 9,000 jobs in total within the Borough. This is based on the South West Hertfordshire Economic Study (February 2016). It is noted that under the preferred ‘employment led’ growth scenario, total B-class job growth in Hertsmere from 2013 to 2036 is expected to be 13,800.¹

3.4 The Economic Study concludes that:

“There is therefore a pressing need for the South West Herts authorities to identify additional sites in order to retain its competitiveness with other locations in East and South East England. Based on this evidence, the South West Herts authorities may need to consider whether the exceptional circumstances exist to justify Green Belt releases for employment purposes.” (para 9.46)

3.5 On the basis of the above and as noted in the Issues and Options document, the Council needs to identify accessible sites for new industrial and commercial development.

3.6 As set out in the representations submitted on behalf of L&G to the Issues and Options stage (enclosed at Appendix 1), we agree that the Council should plan positively to provide sufficient employment land for the full 9,000 new jobs identified in the Economic Study commissioned by the Council.

3.7 As also noted in the Issues and Options document, there is insufficient brownfield land in the borough to meet all the need for new employment land and residential development. Therefore, the Council will need to identify additional land, which is not previously developed, to meet these identified needs. Borehamwood is Hertsmere’s principal town and further economic development should be supported in this location as a priority.

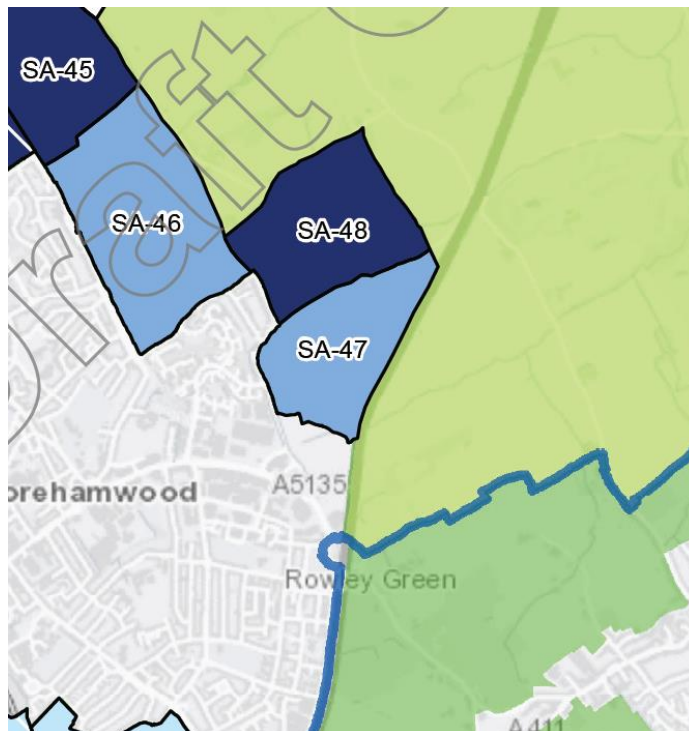
3.8 In view of the above, the existing safeguarded employment site (HEL387) should be extended to include all of the land within L&G’s ownership. The site is available now and, therefore, should be allocated for the delivery of employment development in the short term, i.e. within the next version of the Local Plan.

¹ It is noted that the Economic Study has a study period of 2013-2036, whereas the emerging Local Plan is being prepared to have a plan period of 15 years.

Green Belt

- 3.9 The existing area safeguarded for employment (HEL387) was released from the Green Belt by Policy CS13 of the HBC Core Strategy (2013). The area to the north, part of which forms the northern half of the L&G site, remains designated as Green Belt land.
- 3.10 A draft version of the Hertsmere Green Belt Assessment Stage II was prepared by Arup on behalf of HBC and was published in October 2018. Sub-area 47 (“SA-47”) in the Green Belt Assessment comprises the northern half of the L&G site (i.e. HEL376b) as well as additional land extending north and east (see Figure 3.1).

Figure 3.1 SA-47 Green Belt Sub-Area



Source: Arup (2018)

- 3.11 The Green Belt Assessment scores each sub-area against the purposes of the Green Belt which are set out in the National Planning Policy Framework. SA-47 does not score highly for any purpose, scoring moderately against some and poorly on others as set out in Table 3.1:

Table 3.1 Assessment of SA-47 against purposes 1-4

Purpose no.	Purpose	Score from 0 (lowest) to 5 (highest)
1	(a) Land parcel is at the edge of one or more distinct large built-up areas.	Pass
	(b) Prevents the outward, irregular spread of a large built-up area and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary.	3
2	Prevents development that would result in merging of or significant erosion of gap between neighbouring settlements, including ribbon development along transport corridors that link settlements.	1
3	Protects the openness of the countryside and is least covered by development.	3
4	Protects land which provides immediate and wider context for a historic town.	0

Source: Arup (2018)

3.12 The Assessment notes the following in respect of SA-47:

- SA-47 is located adjacent to the large built up area of Borehamwood, and is adjacent to an area already released from the Green Belt;
- The A1 forms a defensible feature which restricts the outward growth of Borehamwood;
- SA-47 forms a less essential part of the gap between Borehamwood and Potters Bar, which is of sufficient scale and character that the settlements are unlikely to merge;
- SA-47 does not abut an identified historic settlement core; and
- Overall, SA-47 performs less strongly against the Green Belt purposes than the wider Green Belt Parcel (18) it sits within.

3.13 It is also noted that Chapter C (Landscape and Visual Effects) of the Environmental Statement which accompanied planning application ref. 14/1735/OUT notes that traffic noise and tall buildings have a notable intrusive effect on the quality of the landscape in the northern half of the L&G site.

3.14 On the basis of the above, and in view of the “pressing need” for HBC to identify additional sites for economic development, we consider that the southern part of SA-47 (i.e. HEL376b) should be released from the Green Belt. The site is adjacent to a now established employment allocation and, as identified in the Sites document, is in close proximity to the A1 and M25 which means it has excellent connections to the wider transport network. The site is also adjacent to the principal town in Hertsmere, Borehamwood, and therefore has good access to labour and services. The Sites document also notes that Rowley Lane forms a “durable boundary feature” which would restrict sprawl.

3.15 As set out in paragraph 137 of the National Planning Policy Framework (NPPF) (2018), the release of Green Belt land will be considered in the context of whether a plan “*makes as much use as possible of suitable brownfield sites and underutilised land*”. As set out above, HBC has acknowledged that it does not have a sufficient supply of brownfield sites to accommodate the anticipated level of employment growth. As such, the release of Green Belt in Hertsmere is appropriate in this regard.

- 3.16 Overall, a number of significant factors set out in the Green Belt Assessment and the Sites document demonstrate that the site should be released from the Green Belt, which would facilitate a comprehensive development for employment uses of the wider site. The entire site would make a substantial contribution to the Borough's employment land requirements, and significant weight must be attached to this in consideration of the release of the site from the Green Belt.

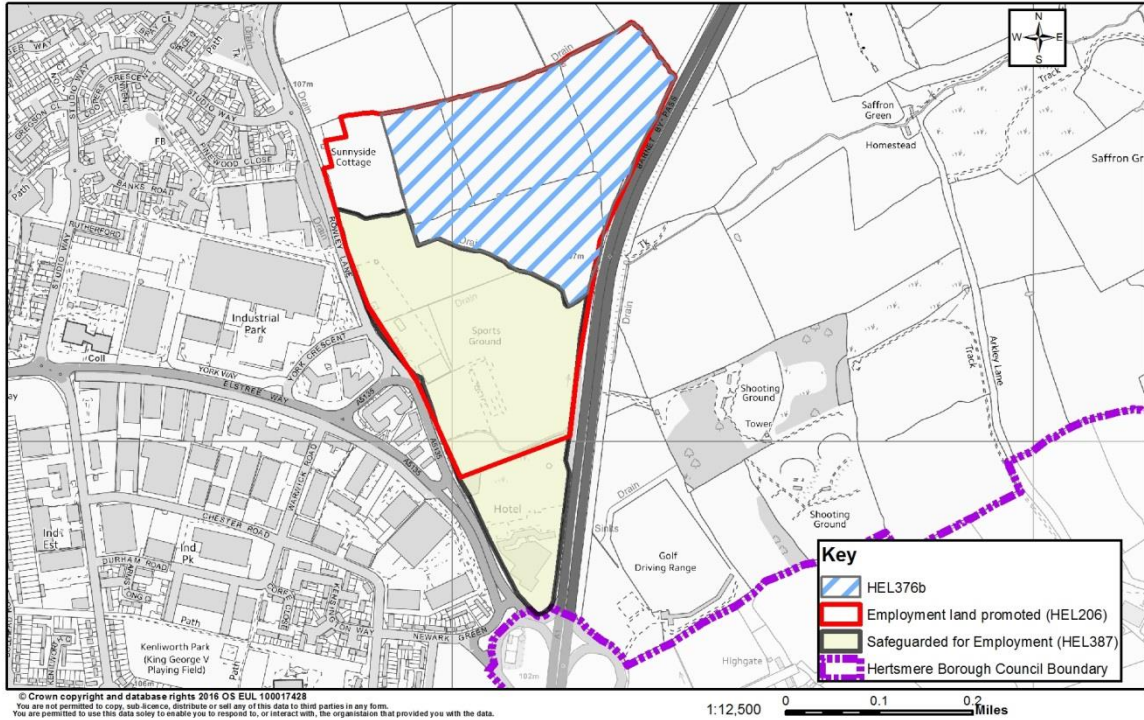
4.0 Conclusion

- 4.1 The wider L&G site (including that covered by the outline planning permission) can support economic development to contribute towards HBC's target of creating 9,000 new jobs over the plan period.
- 4.2 The South West Herts Economic Study (2016), which forms a key part of the evidence base for the emerging Local Plan, identifies a significant employment land requirement for Hertsmere. It has been acknowledged by HBC that this requirement cannot be met by brownfield land alone. Furthermore, the Economic Study concludes that the South West Herts authorities will have to consider releasing Green Belt land to meet the identified employment land requirements. The outline planning permission confirms that the site is highly accessible and can accommodate a significant level of development.
- 4.3 L&G therefore supports the allocation of site EMP3 for employment land in the emerging Local Plan, as identified in the sites document. We note that the existing site allocation set out in adopted Policy SADM9 also refers to the provision of a "*sports hub or sports centre of excellence*". Any allocation included in the emerging Local Plan should be consistent and also allow for sports related development as well as employment uses on the site.
- 4.4 On the basis of the above, the northern part of the L&G site (HEL387b) should be released from the Green Belt to allow development to come forward on this part of site. This would allow the entire L&G site to come forward in a comprehensive development to support economic growth in Hertsmere.

Appendix 1: EMP3 site proforma

3.2 Employment sites – Borehamwood & Elstree

Site address / location	Land east of Rowley Lane, Borehamwood	Site reference	EMP3
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Site information

Total Size (ha) gross	29.8 (HEL208) Employment land promoted	Site source	Call for sites 2017/Issues & Options 2017
	14.5 (HEL 387) site safeguarded for employment	Site promoter	Lichfields on behalf of Legal and General Assurance Society Ltd and Woolf Bond Planning on behalf of Wrotham Park Estates
Current use	Open land on the edge of built up area.	Issues and Options site category	Employment site
Surrounding uses	Borehamwood to West. A1M runs along the Eastern Edge. Hotel to South of the Site, Open fields with minor development to North.		
Potential to be joined to another site(s)	No		

EMPLOYMENT SITES, BOREHAMWOOD AND ELSTREE

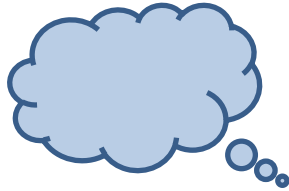
Proposed use	Economic development	Potential capacity	Number of jobs created dependent on businesses which would locate to the site
High level assessments			
Land Availability Assessment (2018)	The area promoted for employment use comprises open countryside in the Green Belt to the north but is largely undeveloped in the centre with land safeguarded for employment or developed in the south. Part of the site is within Flood Zones 2 and 3 and several watercourses cross the site. Several listed buildings and a wildlife site adjoin the northern part of the area. Access would be onto Rowley Lane, including through the creation of an eastern arm at the roundabout with Studio Way.		
Site ref: HELAA 206 376b and 387	The northern end of the site (HEL376B) is some distance from the centre of Borehamwood, being up to two miles from the rail station and over one mile from the edge of the town centre. Currently no buses serve the site, with the nearest bus stop approximately 200m from the south west site boundary. A detailed highway assessment would be required to assess the impact on both the local road network and the strategic road network, given the proximity to the A1.		
Green Belt assessment (Stage 1)	<p>A large proportion of the site has previously been safeguarded for economic development, and is not located within the Green Belt. The northern part of the site however, lies within the Green Belt.</p> <p>The Stage 1 Green Belt assessment identified much of the area within which northern part the site is located as scoring highly for purpose 3 (safeguarding the countryside). Rowley Lane is identified as one of a number of durable boundary features with the area as a whole largely comprising of open fields with long views and an unspoilt rural character.</p>		
Green Belt assessment (Stage 2)	The southern part of EMP3 is safeguarded land which is outside the Green Belt. The Stage 2 Green Belt assessment identifies the sub-area within which the northern part of EMP3 lies as meeting the Green Belt Purpose Assessment criteria moderately and making an important contribution to the wider Green Belt. It does not recommend this sub-area for further consideration.		
Accessibility Mapping	The accessibility mapping identified the site as scoring 3 out of 10 with the site located a considerable distance from public transport and other local services.		

Summary

Benefits and opportunities	Challenges and constraints
<p>A significant part of the area is already accepted as an appropriate location for economic development following independent examination of current Local Plan</p> <p>Logical extension of existing industrial estate/employment area bringing inward investment to Borehamwood</p> <p>Close proximity to A1 and M25</p>	<p>Local highways impact including cumulative effect of additional traffic onto surrounding roads and A1 junction</p> <p>Some distance from train station and town centre</p> <p>Loss of green belt land beyond existing safeguarded employment</p> <p>Landscape and visual impact beyond the southern part of the site</p>

EMPLOYMENT SITES, BOREHAMWOOD AND ELSTREE

Potential to improve the appearance of the southern part of the site close to the junction with the A1



Please provide your comments on site EMP3

Appendix 2: L&G representations to Issues and Options stage

Hertsmere Borough Council
Civic Offices
Elstree Way
Borehamwood
Herts
WD6 1WA

Date: 30 November 2017
Our ref: 13791/NG/TW/15133589v1
Your ref:

Dear Sir/Madam

Hertsmere Local Plan Issues and Options Consultation 2017

On behalf of our client, Legal & General Assurance Society Limited ("L&G"), we are pleased to have the opportunity to comment on Hertsmere Borough Council's Issues and Options document. L&G controls a 26 ha area of land to the east of Rowley Lane, Borehamwood.

An extant planning permission (ref. 14/1735/OUT) covers the site and permits a mix of sports and employment uses comprising pitches, sports hall, sports academy, hotel/hostel, office/commercial and research buildings and parking.

The site is identified as safeguarded land for employment development under Policy SADM9 of the Site Allocations and Development Management Policies document and paragraph 3.11 of the supporting text states "*a sports hub or sports centre of excellence is considered appropriate, particularly if it creates new jobs and can be accommodated satisfactorily in its surroundings*". The extant permission is supported by Policy SADM9 with particular emphasis on generating opportunities for employment use. The permitted range of employment uses, including both commercial and research, can deliver this within the site. The site is available now and, therefore, should be allocated for the delivery of economic development in the short term.

We set out our responses to relevant questions from the Issues and Options Consultation document below.

Question 8 (Jobs) – Do you agree that we should plan for this level of new jobs (9,000 new jobs over 15 years) to support business creation and meet the employment needs of an increasing population?

L&G agrees that the Council should plan for the full 9,000 new jobs identified in the Economic Study commissioned by the Council. It is important that the Council plans to support economic growth in the key sectors that are identified in the Issues and Options document, such as scientific research and development, pharmaceuticals, and wholesale and retail trade.

The Issues and Options document makes specific reference to the Rowley Lane site. It states:

"We have previously identified land on the edge of Borehamwood (between the A1 and Rowley Lane)...for future growth, but we think that some additional land will be needed" (page 19).

As noted above, the site is available now and, therefore, should be allocated for the delivery of employment development in the short term to support the Council's aspirations for delivering 9,000 new jobs over the plan period.

Question 12 (Redevelopment of urban brownfield sites) – *Which areas do you think are best placed to accommodate this type of growth and why?*

A range of sites will be required to meet the forecast growth, including brownfield land. As noted in the Issues and Options document, the Council will need to identify additional land to meet the Borough's identified employment needs. Borehamwood is Hertsmere's principal town and further economic growth should be supported in this location.

Conclusion

The Rowley Lane site can support employment development to contribute towards the Council's target of creating 9,000 new jobs over the plan period and to support economic growth in Borehamwood. The site is available now and, therefore, should be allocated for the delivery of employment development in the short term.

We trust that the above is self-explanatory and that our comments will be considered in the preparation of the next stage of the Hertsmere Local Plan. Please contact me or my colleague Tom Willshaw should you have any queries.

Yours faithfully



Neil Goldsmith
Senior Director

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