


Application Number: 22/06443/FULEA

Site Address: Land Adjacent South Side Marlow Road and A404 Junction
Westhorpe Park, Little Marlow, Buckinghamshire

Case Officer: Emma Crotty

Representation by: Save Marlow's Greenbelt

Submitted By: Sam Kershaw
Trustee, Save Marlow's Greenbelt


Date: 11th March 2024

Comment Type: Objection

The applicant's claims for very special circumstances are open to reasonable doubt and their weight in the planning balance cannot be determined solely on the basis of arguments presented in the Economic Case. The scope, complexity and uncertainty of the underlying issues are such that expert consultation is required to allow a proper consideration.

The extent of socio-economic benefits, such as new jobs and GVA, is dependent on the studio's occupancy rate. The applicant's economic case assumes constant, full occupancy, which is questionable. A probabilistic occupancy forecast that analyses the risks and dependencies within Marlow Studios' business model is required to properly estimate the value of these benefits.

A fundamental dependency is the national and regional demand for studio space. This demand is influenced by a variety of complex commercial and macroeconomic factors. The Economic Case alone is insufficient to allow an adequate consideration of these factors as its justification is based only on selected data, newspaper reports and anecdotal evidence. A comprehensive, independent analysis of current, reliable data is required to properly assess demand.

Furthermore, the development's level of support for local and national government policies cannot be properly determined without a reliable assessment of the demand for studio space and of the consequential socio-economic benefits.

The state of the film and HETV production industry has significantly changed since the application was first submitted. Consequently, the LSH report of 2022 is no longer reliable and its scope is insufficient to allow for a proper consideration of all relevant factors. Therefore, Buckinghamshire Council should commission a new, wide-ranging expert review of the Economic Case that includes ten-year probabilistic forecasts of the following -

- The supply and demand for studio space.
- The number of new direct and indirect FTE jobs created by Marlow Studios.
- Marlow Studios contribution to the growth of the UK Film and HETV production industry.
- Marlow Studios contribution to economic growth and productivity at a regional and national level.
- The value of Marlow Studios proposed training programmes.

The analysis should also consider the extent to which benefits are dependent upon the studio being built at the proposed site in Marlow.

A review of some issues that require expert analysis is provided below.

Socio-Economic Benefits

1. The applicant states that
 - a. *Marlow Film Studios would create approximately 4,000 new jobs. Of these jobs, approximately 2,000 would be technical and production roles created by the studios and a further 2,000 jobs would be in the wider economy.*¹
 - b. *Marlow Film Studios would lead to the creation of an estimated 1,780–2,415 full-time equivalent (FTE) jobs*²
2. The applicant does not explain how these estimates for new jobs were calculated nor does it identify the dependencies and risks.
3. Bucks' Directorate for Planning, Growth and Sustainability cannot simply accept these estimates without scrutiny, as it did in its report of 23rd July 2022.
4. Film studios directly employ a relatively small number of people (eg Pinewood employs less than 250 and Shinfield less than 10).
5. The vast majority of Film & HETV production jobs are performed by freelancers who work at different studios for the duration of a production.
6. There is no evidence that the availability of freelancer jobs is constrained by the availability of studio space. Nor is there evidence that the provision of additional studio space will directly lead to a proportionate increase in new freelancer jobs.
7. As a recent report from O&O³ makes clear, the creation of new jobs is dependent upon a variety of factors that are outside the influence of individual studio developers. It is not simply a case of "If you built it, they will come".
8. Consequently, there is reasonable doubt as to whether Marlow Studios will "create" 2,000 "new" jobs or whether it will merely create an alternative workspace for existing freelancers who would otherwise be employed elsewhere.
9. Furthermore, given the irregular nature of film production jobs, the applicant's calculation of full-time equivalency is also questionable.
10. These doubts are heightened by evidence that recent increases in studio space have not led to an increase in jobs. In fact, BECTU, in its recent report "*UK film and TV industry slowdown: a sector in crisis*" states that 68% of film and TV workers were out of work in February 2024 with 58% saying they have not seen any recovery in their employment since the end of US industrial action.
11. Therefore, in order to properly determine the weight of this benefit, it is necessary for Bucks Council to obtain-
 - a. A growth forecast for new UK film & HETV production jobs over the next ten years
 - b. An estimate of Marlow Studio's share of those new jobs
 - c. An estimate of the full-time equivalency of these jobs
12. The claim that 2,000 new jobs will be created in the wider economy is also open to question as no justification or analysis is provided and there is no evidence of a lack of capacity in the existing supply chain. Furthermore, the applicant has failed to properly respond to the Bucks Economic Development Officer's request for "*further discussion around broader supply chain opportunities; monitoring and potential targets; and the scope to develop a programme of tailored support for local small and medium sized enterprises that could help them grow and succeed in the sector.*"

¹ Update to the Economic Case, 2024, para 2.16

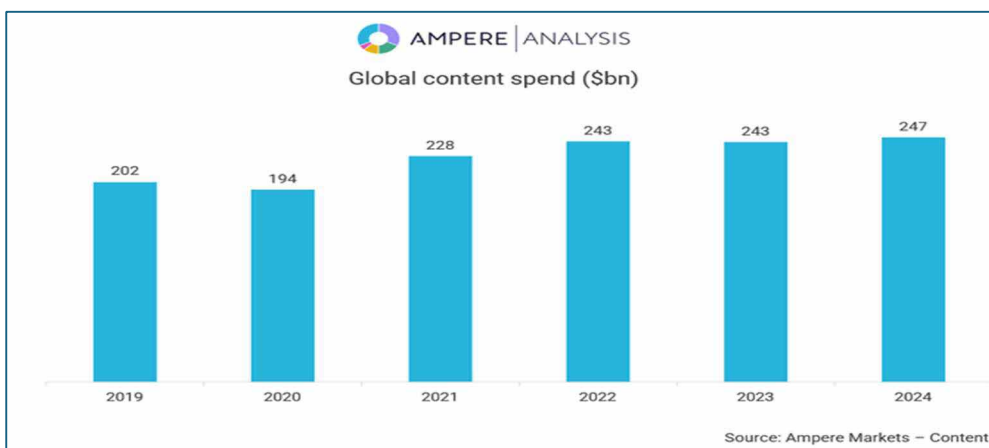
² Economic Case, 2022, para 7.4

³ O&O: Understanding the UK's TV Production Sector, August 2023

13. Similarly, estimates of the additional GVA generated by Marlow Studios are open to question as they assume there will be sufficient growth in demand to fully utilise all forecast UK studio capacity. If, as is likely, this is not the case, then there will be no net increase in national GVA as Marlow Studios will simply provide an alternative location for productions that would otherwise take place elsewhere. In these circumstances the national GVA is very likely to decline since increased competition will drive down studio fees and wages.
14. The value of the proposed training programmes should be independently assessed to determine their weight in the planning balance. The Economic Case does not describe the training that will be provided (or even whether it is training in film production skills) nor does it identify the types of qualifications attainable. Therefore, it isn't possible to determine its value or the extent to which the proposed 60 training places and investment of £105,000 pa (i.e £146 per person per month) will contribute to industry needs identified by SaUery and Nordicity in their report for ScreenSkills.⁴
15. The claim that Marlow Studios will “*help keep and attract young talent to Buckinghamshire*” is also questionable as the average age of the film production workforce is 39⁵. It worth noting that our “young talent” already has 15 film studios (including Pinewood) and the National Film and Television School within half an hour's drive of Marlow.
16. The applicant claims that 25,000 children across Buckinghamshire list the screen industry as their dream career and implies that Marlow Studios will enable them to realise this dream. This questionable claim is based on the applicant's dubious interpretation of a national BFI⁶ survey in which 20% of the 507 UK children questioned via TikTok stated that the film industry was their “dream career”. Of those surveyed, 51% wanted to be an 'actor', 25% said 'streamer' and 9% said 'director'.

Meeting the need for film and television facilities.

17. Section 2 and Appendix A of the Economic Case argues that Marlow Studios is needed to support growth in UK Film & HETV production.
18. Growth is primarily driven by external factors such as global investment, the UK's competitiveness and technological innovations such as AI.
19. Global Investment in original content production has flattened as a consequence of structural changes in the maturing streaming industry and the end of cheap money. It is now estimated to grow by less than 2% in 2024 with further declines anticipated.



⁴ <https://www.saUery.com/insights/articles/uk-film-and-tv-crew-need-more-training-investment-report/>

⁵ Skillset: Film Sector –Labour Market Intelligence Digest

⁶ BFI: What's stopping young people from pursuing a career in the screen industries?. <https://core-cms.bfi.org.uk/media/22249/download>

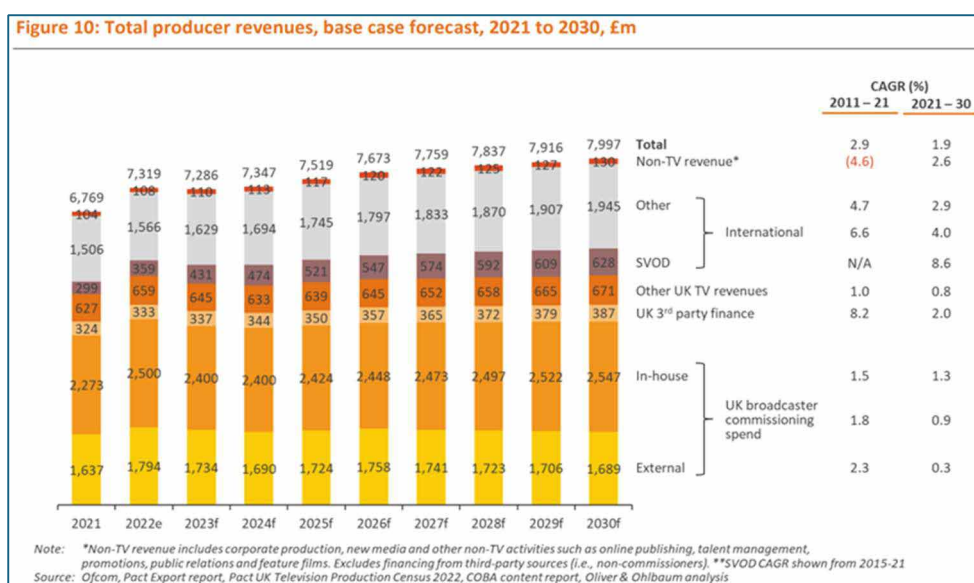
20. In parallel, the UK's share of global investment has declined for a variety of reasons including increased competition from other countries, the cost and availability of skilled staff and the UK's uncompetitive tax system (including punitive business rates for film studios).
21. The BFI recently reported⁷ that, in 2023, inward investment for HETV production fell by 43% and for film production by 40%.
22. The latest data from BFI on film and HETV production⁸ reveals that the number of UK projects has reduced from 568 in 2019 to 394 in 2023

Summary Table: Combined number of productions and UK spend of film and HETV projects 2019-2023

Year	No. Films	Film UK Spend (£b)	No. HETV	HETV UK Spend (£b)	Total No. Projects	Total UK spend (£b)
2019	399	2.17	169	2.47	568	4.65
2020	294	1.74	135	1.95	429	3.69
2021	337	1.64	247	4.72	584	6.36
2022	326	2.22	226	4.85	552	7.06
2023	207	1.36	187	2.87	394	4.23

Source: BFI

23. Oliver & Ohlbaum report⁹ that the forecast CAGR of producer revenues from 2021 to 2030 has reduced from 2.9% to 1.9% - this is less than the rate of inflation.



24. Anecdotal evidence indicates that many UK studios are working at significantly reduced capacity as a consequence of this severe slowdown. And recent reports from PACT¹⁰ and BECTU¹¹ describe how these developments are impacting the entire industry.
25. There is growing concern that the industry may be further impacted by the adoption of Artificial Intelligence in the production process. This concern has been heightened by recent news that Tyler Perry's planned \$800 million studio expansion in Atlanta has been halted due to his growing concerns over developments in AI¹².

⁷ <https://www.bfi.org.uk/news/official-bfi-2023-statistics>

⁸ BFI: Film and high-end television programme production in the UK: full-year 2023,

⁹ O&O: Understanding the UK's TV Production Sector (August 2023),

¹⁰ "A review of the challenges facing UK independent film and the impact of tax relief support", August 2023

¹¹ "UK film and TV industry slowdown: a sector in crisis", February 2024

¹² <https://variety.com/2024/film/news/tyler-perry-studio-expansion-openai-sora-concerns-1235920007/>

26. There is no evidence that this decline in growth is due to a shortage of UK studio space or to a lack of suitability sized studios in the southeast. Nor that an increase in the number of “best in class” studios in the southeast would reverse it. In fact, neither the availability, quality nor location of studio-space is mentioned in any of the aforementioned reports.
27. This recent data clearly demonstrates that the forecasts provided by Volterra for studio supply & demand are outdated and unreliable. As are those produced by various real-estate firms. They cannot reasonably be used as a basis for assessing very special circumstances.
28. The applicant’s assumption [para 3.11] that 75% of future production spend will occur in the southeast is also questionable. The LSH report of Dec 2022 commissioned by Bucks Council expressed scepticism about the applicant’s claim that the value of this type of studio is dependent upon its proximity to the critical mass of the “West London Cluster”. This scepticism has proven to be justified by recent announcements of new studio development, similar to the applicants’, across the UK, including the huge “Crown Works Studios” in Sunderland.
29. Therefore, a comprehensive, impartial analysis of recent, reliable data sources is necessary to enable Bucks Council to assess the real need for Marlow Studios and to estimate its consequential occupancy rate so that a proper consideration of very special circumstances can be made.

Meeting local and national government policy.

30. The Local Skills Report of 2022 identifies film & TV as a local priority sector on the basis of a 2020 study which states that “ *the creative industries were one of the fastest growing parts of the UK economy*”. As demonstrated above, this growth is now longer evident.
31. The Buckinghamshire Growth Strategy 2017-2050 identifies Pinewood Studios as an area of focus and recommends an investment of “£50m over five years for the development of a creative and digital industries growth hub to build on the world-leading cluster of studio, film and digital businesses at Pinewood”. Consideration should therefore be given to the potential harm to Pinewood caused by a large new studio in Marlow, less than 30 miles away,
32. The notion, presented in the Economic Case, that Bucks is somehow in competition with other counties to have the most studios is fanciful and not supported by any policies or strategies. If there is no demand for additional space then studios will be engaged in a zero-sum game in which economic benefits gained in one region will be offset by losses in others. In fact, the net-net is likely to be negative due to increased competition between studios.
33. No estimate is provided for the number of new jobs that would be filled by, or be suitable for, Buckinghamshire residents - a county with one of the lowest unemployment rates in the UK. The Marlow location has been selected to provide easy access for freelance workers from the West London Cluster so its effect on the Bucks employment rate is questionable.
34. The spring budget (6th March 2024) introduced a 53% expenditure credit (equating to a tax relief of approximately 40%) for UK film productions with a budget up to £15m. This aims to provide support for small independent productions and therefore has no significance to Marlow Studios which has been designed for use by major film and HETV productions.
35. The Budget also included funding for “Crown Works Studios” in Sunderland through a devolution package for the north-east of England that supports the aims of the Government’s Levelling-Up strategy . Marlow Studios would compete with the Crown Works Studios thereby reducing the impact of that investment and undermining the Levelling-Up initiative.