

PLANNING COMMITTEE

NOTICE AND AGENDA

For a meeting to be held in the Penn Chamber, Three Rivers House, Northway, Rickmansworth on Thursday, 21 November 2024 at 7.30 pm

Members of the Planning Committee:-

Councillors:

Chris Whately-Smith (Chair)
Harry Davies
Steve Drury
Chris Lloyd
Andrea Fraser
Philip Hearn

Elinor Gazzard (Vice-Chair)
Abbas Merali
Debbie Morris
Chris Mitchell
Stephen King

*Joanne Wagstaffe, Chief Executive
Wednesday, 13 November 2024*

The Council welcomes contributions from members of the public to aid discussions on agenda items at Planning Committee meetings.

Details of the procedure are provided below:

For those wishing to speak:

Please note that, in the event of registering your interest to speak on an agenda item but not taking up that right because the item is deferred, you will be given the right to speak on that item at the next meeting of the Planning Committee.

Members of the public are entitled to speak on an application from the published agenda for the meeting either in support of the application or against. Those who wish to speak can arrive on the night from 7pm to register with the Committee Manager. One person can speak in support of the application and one against.

Please note that contributions will be limited to no more than three minutes.

For those wishing to observe:

Members of the public are welcome to attend the meetings. If you wish to observe you can arrive on the night from 7pm.

In accordance with The Openness of Local Government Bodies Regulations 2014 any matters considered under Part I business only of the meeting may be filmed, recorded, photographed, broadcast or reported via social media by any person.

Recording and reporting the Council's meetings is subject to the law and it is the responsibility of those doing the recording and reporting to ensure compliance. This will include the Human Rights Act, the Data Protection Legislation and the laws of libel and defamation.

1. APOLOGIES FOR ABSENCE

2. DECLARATIONS OF INTEREST

To receive any declarations of interest.

3. NOTICE OF URGENT BUSINESS

Items of other business notified under Council Procedure Rule 30 to be announced, together with the special circumstances that justify their consideration as a matter of urgency. The Chair to rule on the admission of such items.

4. 22/1945/FUL: HYBRID APPLICATION FOR THE CREATION OF A FILM HUB TO INCLUDE DETAILED APPROVAL FOR DEMOLITION OF A NUMBER OF EXISTING BUILDINGS INCLUDING CHILDREN'S FARM BUILDINGS AND CHANGE OF USE OF LANGLEYBURY HOUSE AND AISLED BARN FOR FILMING AND THE CONSTRUCTION OF A CAFE WITHIN THE WALLED GARDEN, NEW CAR PARKING AREA TO NORTH OF SITE, ALTERATIONS TO EXISTING ACCESS POINTS ALONG LANGLEYBURY LANE, CHANGE OF USE OF THE L SHAPED BARN (TO MULTI PURPOSE USE INCLUDING CYCLE HUB, SHOWERS AND VEHICLE STORAGE) AND CHANGE OF USE OF GROUND FLOOR OF THE EXISTING LAUNDRY TO RECEPTION FACILITY, TOGETHER WITH OUTLINE PLANNING APPROVAL (MATTERS RESERVED: SCALE, LAYOUT, APPEARANCE AND LANDSCAPING) FOR CHANGE OF USE OF SITE TO A FILM HUB TO INCLUDE CRAFT WORKSHOP BUILDINGS, SOUND STAGES, SUPPORT WORKSHOPS, PRODUCTION OFFICES, BACKLOTS, FILM AND TELEVISION TRAINING FACILITY BUILDING, OFFICES, ANCILLARY BUILDINGS, PARKING AREAS AND RELOCATION OF LANGLEYBURY CHILDREN'S FARM INCLUDING NEW FARM BUILDINGS.

(Pages 5 - 190)

Hybrid application for the creation of a Film Hub to include detailed approval for demolition of a number of existing buildings including children's farm buildings and change of use of Langleybury House and Aisled Barn for filming and the construction of a cafe within the Walled Garden, new car parking area to north of site, alterations to existing access points along Langleybury Lane, change of use of the L Shaped Barn (to multi purpose use including cycle hub, showers and vehicle storage) and change of use of ground floor of the existing Laundry to reception facility, together with outline planning approval (matters reserved: Scale, Layout, Appearance and Landscaping) for change of use of site to a Film Hub to include Craft Workshop buildings, Sound Stages, Support Workshops, Production Offices, Backlots, Film and Television Training Facility Building, Offices, Ancillary Buildings, parking areas and relocation of Langleybury Children's Farm including new farm buildings. Alterations to existing cycle path and pedestrian network within the site, to include provision of a new pedestrian/cycle access within the site to the A41 at Land to the east of Langleybury lane, including Langleybury House Estate, Langleybury Lane.

Recommendation: That planning permission is refused.

5. OTHER BUSINESS - IF APPROVED UNDER ITEM 3 ABOVE

Exclusion of Public and Press

If the Committee wishes to consider any items in private, it will be appropriate for a resolution to be passed in the following terms:

“that under Section 100A of the Local Government Act 1972 the press and public be excluded from the meeting on the grounds that it involves the likely disclosure of exempt information as defined in Part I of Schedule 12A to the Act. It has been decided by the Council that in all the circumstances, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.”

(Note: If other confidential business is approved under item 3, it will also be necessary to specify the class of exempt or confidential information in the additional items).

General Enquiries: Please contact the Committee Team at
committeeteam@threeivers.gov.uk

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PLANNING COMMITTEE

22/1945/FUL: Hybrid application for the creation of a Film Hub to include detailed approval for demolition of a number of existing buildings including children's farm buildings and change of use of Langleybury House and Aisled Barn for filming and the construction of a cafe within the Walled Garden, new car parking area to north of site, alterations to existing access points along Langleybury Lane, change of use of the L Shaped Barn (to multi purpose use including cycle hub, showers and vehicle storage) and change of use of ground floor of the existing Laundry to reception facility, together with outline planning approval (matters reserved: Scale, Layout, Appearance and Landscaping) for change of use of site to a Film Hub to include Craft Workshop buildings, Sound Stages, Support Workshops, Production Offices, Backlots, Film and Television Training Facility Building, Offices, Ancillary Buildings, parking areas and relocation of Langleybury Children's Farm including new farm buildings. Alterations to existing cycle path and pedestrian network within the site, to include provision of a new pedestrian/cycle access within the site to the A41 at LAND TO THE EAST OF LANGLEYBURY LANE, INCLUDING LANGLEYBURY HOUSE ESTATE, LANGLEYBURY LANE

Parish: Abbots Langley

Ward: Gade Valley

Expiry of Statutory Period: 16 February 2023

Case Officer: Suzanne O'Brien

Extension agreed to 29 November 2024

Recommendation: That Planning Permission is Refused

Reason for consideration by the Committee: The application has been called in to committee by three Members of the Planning Committee. The application was called in due to effect on Green Belt and traffic issues. In addition the proposal represents a departure from the Development Plan.

To view all documents forming part of this application please go to the following website:

<https://www3.threerivers.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=RJZMS6QFLCB00>

1 **Relevant Planning History**

- 1.1 20/1775/RSP - Retrospective: Erection of palisade fence and associated gate - Permitted - 23.10.2020.
- 1.2 20/2301/LBC - Listed Building Consent: Internal and external repairs to the kitchen and north bay window, including repairs to roof, walls, ceilings and kitchen windows - Permitted - 21.12.2020.
- 1.3 20/2759/LBC - Listed Building Consent: Temporary retention of alterations to interior and exterior of Langleybury House for film set dressings – Permitted - 11/08/2021.
- 1.4 20/2760/LBC - Listed Building Consent: Retention of permanent alterations to interior and exterior of Langleybury House as a result of filming use - Permitted - 23.07.2021.
- 1.5 21/0460/ADV - Retrospective Advertisement Consent: Erection of 2no. non-illuminated signs at the entrance to the Drive, and 1no. non-illuminated sign at the entrance to Home Farm Drive – Permitted - 20.04.2021.
- 1.6 20/1697/RSP - Retrospective: Temporary change of use of the site and buildings to film studios, erection of sound studio building and engineering operations including formation of hardstanding and levels changes and associated works with the change of use including film sets, storage compounds, marquees and lighting (temporary permission of period of three years) – Permitted – 03.09.2021.

- 1.7 24/0666/RSP - Variation of Condition 1 (Temporary Permission) pursuant to planning permission 20/1697/RSP (Retrospective: Temporary change of use of the site and buildings to film studios, erection of sound studio building and engineering operations including formation of hardstanding and levels changes and associated works with the change of use including film sets, storage compounds, marquees and lighting (temporary permission of period of three years)) to extend the temporary permission for a further 36 months – granted temporary planning consent up to July 2027.

Pending Applications

Langleybury House

- 1.8 22/2064/LBC - Listed Building Consent: A scheme of internal repairs throughout the building combined with external removal and dismantling works (to include stripping out/demolition, set removal, temporary dismantling, and unit salvage) – Pending Consideration.
- 1.9 22/2131/LBC - Listed Building Consent: External landscaping works to Walled Garden and formal garden of the Mansion including repair works in respect of stairs, fountain plinth and bench, boundary walls, North Yard, Garden Walls, Boiler House and Historic Pond – Pending Consideration.

Stable Block

- 1.10 22/2075/LBC - Listed Building Consent: External works to building to include removal of modern features and fixings and dismantling, replacement/reinstatement of features including lead work, roof, clock tower, vents pipe works, brick features and fenestration – Pending consideration.

Aisled Barn

- 1.11 22/2075/LBC - Listed Building Consent: External works to building to include removal of modern features and fixings and dismantling, replacement/reinstatement of features including lead work, roof, clock tower, vents pipe works, brick features and fenestration – Pending consideration.

L Shaped Barn

- 1.12 22/2082/LBC - Listed Building Consent: Conversion of building to multi purpose use including cycle hub, showers and vehicle storage including internal alterations, demolition of lean-to structure, removal of truncated door and removal of corrugated metal roof covering – Pending consideration.

Former Laundry Building

- 1.13 22/2083/LBC - Listed Building Consent: Internal works to allow the change of use on ground floor from laundry to reception facility. External works to include elements of demolition and improvement works, such as the removal of existing UPVC windows and replacement with timber framed windows and repairs to existing roof and brickwork as required – Pending consideration.

Old Farm Cottages

- 1.14 22/2078/LBC - Listed Building Consent: A scheme of external works to include dismantling and reinstatement of chimneys and parapet walls, lead work removal, masonry cleaning, and a comprehensive programme of repair work to building including to windows, and all windows and doors to be repainted – Pending Consideration.

2 Description of Application Site

- 2.1 The application site comprises 63.40ha of largely open countryside to the south west of Abbots Langley beyond the A41 and bounded by Langleybury Lane to the west and the M25 slip road to the south. Within the site to the northwest is Langleybury House and grounds (Grade II* listed), Langleybury Stables (Grade II listed), the Aisled Barn at Langleybury (Grade II listed) and Old Farm Cottages (Grade II listed) in addition to a number of other buildings associated with the historic Langleybury Estate and a series of two and three storey buildings associated with the former Langleybury School (which closed in 1996). The site includes a number of existing residential properties that are not proposed to be changed in use and also encompasses the existing Childrens Farm sited within the historic Walled Garden. The site extends southwards from Langleybury House down to the boundary with the M25 slip road; the land to the south and east of the built form consists of open undulating parkland landscape.
- 2.2 Since the closure of the school in 1996, different parts of the site have been put to various uses, with agricultural uses taking place generally to the south of the site, a children's farm to the north, and filming activities taking place within Langleybury House and its surrounding land including in and around the school buildings which currently have temporary consent for filming.
- 2.3 More recently the house, its curtilage, the stable buildings, the school buildings and grounds have been used on a larger scale for filming, with external areas being used for short term and long term film sets. A sound studio building has been constructed within the courtyard of the former school buildings and a number of the former school buildings are used for ancillary purposes to filming, for example, as workshops. Land levels have been altered within parts of the grounds to provide a level platform to allow for the construction of external temporary film sets; and this has also resulted in the laying of additional areas of hardstanding around the existing buildings.
- 2.4 Home Farm, the agricultural unit to the south west of Langleybury House, comprising the land and buildings included within the red line of the application site, have been changed in use on a temporary basis to serve the wider filming within the House and previous school site. The two additional buildings that are sited within the agricultural unit do not benefit from any temporary consent.
- 2.5 The application site is located on the western side of the Gade Valley. Beyond the mansion, to the east of the site, the ground level falls steeply in elevation until it reaches the River Gade and the Grand Union Canal in the centre of the valley. There is a small area of parkland lawn to the north of the main house, the remains of a formal terraced garden to the east, and the remains of a walled garden to the northwest of the mansion.
- 2.6 The site is located within the Metropolitan Green Belt and the Chilterns Landscape Area. The northern boundary of the site is adjacent to the Hunton Bridge Conservation Area. St Pauls Church sited to the north east of the northern boundary of the application site, on the northern side of Langleybury Lane is a Grade II* Listed Building. The church yard contains a Grade II listed Lych Gate and Lloyd Memorial Cross, with the Grade II listed Langleybury War Memorial located east of the yard.

3 Description of Proposed Development

- 3.1 This hybrid planning application seeks outline planning permission for the creation of a Film Hub to include detailed approval for demolition of a number of existing buildings including the Children's Farm buildings and for the change of use of Langleybury House and the Aisled Barn for filming and the construction of a cafe within the Walled Garden, a new car parking area to north of the site to the south east of the Mansion, alterations to the existing access points along Langleybury Lane, change of use of the L Shaped Barn (to multi-purpose use including cycle hub, showers and vehicle storage) and for the change of use

of the ground floor of the existing Laundry to a reception facility. Outline planning approval (matters reserved: Scale, Layout, Appearance and Landscaping) is sought for Craft Workshop buildings, Sound Stages, Support Workshops, Production Offices, Backlots, a Film and Television Training Facility Building, Offices, Ancillary Buildings, parking areas and for the relocation of Langleybury Children's Farm including new farm buildings. Alterations to the existing cycle path and pedestrian network within the site are proposed, is ought, to include provision of a new pedestrian/cycle access to the A41.

3.2 Detailed elements

3.3 The detailed elements of the application consist of the development seeking full planning permission. The detailed part of the application is concentrated around the Langleybury House, Walled Garden and part of the agricultural unit.

3.4 The detailed elements seek full planning permission for the change of use of this part of the site to filming on a permanent basis. They include the following:

3.5 The change of use of the Langleybury House and Aisled Barn and external areas to use for filming. This would not involve any alterations to the buildings in terms of increase in built form. Internal and external making good of these buildings and external landscape features are proposed, details of which do not require planning permission. Full details of the alterations to the buildings are set out within the relevant applications for Listed Building Consent identified within the Planning History section above. The Masterplan (Drawing 1005 Rev R) references that a number of buildings would retain their existing use however it should be noted that the buildings currently being used for filming only benefit from temporary planning permission. As such these buildings would be subject to change of use as part of this application.

3.6 The construction of a café (Building 08-01 on the submitted masterplan): The existing structures within the Walled Garden associated with the existing use as a children's farm would be demolished. The café building would be sited within the historic walled garden to the north west of the Langleybury House. The existing historic wall would be made good where required, with the installation of a pedestrian opening proposed to serve the café. The café would be located along the eastern aspect of the wall. It would measure 10.8m by 27.3m (including the roof overhang) with a maximum height of 4.4m, a double pitched roof, central valley and gabled ends. Internally the café would contain a kitchen, W/Cs, seating area, flexible space and outside covered seating area and is proposed to be used solely to serve the film hub. The café would be predominantly glazed along the south east and south west elevations. A 3.1m wide (approx. 136m long) access path would be provided between the main access road and the north western elevation of the café. The historic gardens would be converted into working gardens.

3.7 Change of use of the ground floor of the existing Laundry building into an office and reception space (Building EX08 on the masterplan): The Laundry building sits in the previous agricultural part of the site and is located to the west of the mansion and stable building. The two existing first floor level residential flats would be retained. The change of use would not result in any alterations to the scale of the building but would include internal alterations including an internal door and the subdivision of the internal layout. Externally no material changes are proposed.

3.8 Change of use of the L shaped barn (Building EX05 on the masterplan); The L shaped barn is sited within the farm yard. It is proposed to be changed into a shower and W/C, maintenance and repair shop, buggy parking, E Bike charging and bike storage. With the exception of the demolition of the small lean to and installation of an external timber door, the building would be made good with few changes to the original features.

3.9 Additional car parking areas would be provided. One would be sited to the south east of the mansion where approximately 46 demarcated car parking spaces will be. The land

levels to the east of the mansion that have historically been raised to serve the temporary filming use of the site, will be regraded back to pre-existing levels. This area however will be retained as hardstanding for parking. A second parking area measuring 31m by 18m would be provided to the north west of Langleybury House (area marked as 11-03); no details of the number of parking spaces proposed here have been provided. A further 9 parking spaces would be provided in a third area, with a 5.3m wide access road sited to the north west of the Laundry Building to provide access.

- 3.10 The application seeks full planning permission for all access points to the site. The two existing vehicular accesses from Langleybury Lane serving Langleybury House and Farm would be improved through an increase in width, demarcation and improved visibility splays. The third access will be served by the existing access serving South Lodge to the south of Langleybury House this again will be increased in width and formalised including demarcation and improved visibility splays, security fencing and gates (elevational details of which have not been provided). The existing historic access leading from the A41 will be upgraded to provide a new pedestrian and cycle route through the lower end of the site with access leading to the filming area and through The Rookery (woodland) to Langleybury Lane. New permissive paths, in addition to the existing public right of ways, will be introduced in the field to the south of the site and a new pedestrian access onto the canal will be provided.
- 3.11 Outline elements (matters reserved: Appearance, Landscaping, Layout and Scale). Although detailed plans have been submitted showing the matters that are reserved, the details on the plans are only indicative.
- 3.12 Children's Farm (Building 07-01 on the submitted masterplan): This is proposed to be relocated to the north of the site and west of St Pauls C of E Primary School. This would be sited adjacent to and served by the access road serving St Pauls C of E Primary School. The indicative plans for the Children's Farm building shows that it would measure 8.4m by 17.2m with a height of 4m and a flat roof. The field to the west of the school's access road would include a new car park, with access and lighting that would serve both the Farm and Primary School.
- 3.13 Propellor Stage Building (Building 05-01 on the masterplan): The existing school building and ancillary buildings will be demolished, including the buildings that only have temporary consent. The replacement structure would consist of a 'propeller stage' building that is proposed to be utilised as two sound stages. This building would provide a training/educational facility that will aim to provide opportunities for further and higher education students to gain experience by working on film and television projects through a combination of paid work and work experience. The 'propeller stage' building would measure a maximum of 80.8m by 22.7m and would have an indicative maximum height of 8.9m.
- 3.14 Commercial Office (Building 12-01): A new building would be sited to the east of the L shaped barn that would be used as commercial office space.
- 3.15 Construction of 'Craft Zone' (PR-01, buildings 01-01 to 01-11) to the south, concentrated around the existing E shaped barn (Building EX07): This would provide warehousing style development that is proposed to provide a series of units available for long term hire as a base for supply chain companies. It is anticipated that the buildings will be occupied by companies involved in: Prop storage, Sculpting, Special Effects, Carpentry, Stunts, Location Supplies, Lighting, Camera Equipment, Grip, Costume or Wardrobe, Hair or Make Up, Visual Effects, Generators, Rigging, Scenery, Photography, Catering, Plant Hire, Editing and Post Production, Recycling and Environmental Work. The indicative plans identify that the buildings would range in height and scale with the larger structures measuring 20m by 12m with a height of 8.3m to the smaller structures measuring 9m by 12m with a height of 6.7m. Parking for cars and HGVs would be provided within and surrounding the Craft Zone.

- 3.16 Development to the south of Langleybury House and existing Farm complex: This area would consist of the studio, support space and backlot. An indicative gap of approximately 181m (increase from 152m within the application as originally submitted) would separate the development within the farm complex and the backlot; 277m would separate the proposed buildings within the Craft complex and the proposed support space (this is increased from 107m within the application as originally submitted).
- 3.17 Support Space (Buildings 03-01 to 03-10): The support and studio buildings would extend along Langleybury Lane and shown to be set in an indicative distance of approximately 28m from the southern boundary that adjoins the M25 slip road. 10 Support buildings (reduced from 20 originally proposed) would be provided. The indicative layout shows that these would be constructed in a linear pattern; it is indicative that these buildings would measure 22m by 36m and 22m by 32m and have a height of 8m. These buildings are anticipated to be occupied as support space to serve the proposed development as workshops, storage and rehearsal space. Each unit has the design and capacity to be subdivided to create two separate units.
- 3.18 Sound Stages (Buildings 02-01 to 02-04): Four sound stages would be provided within the southern part of the site. These would have a maximum height range of 17m and would measure 42m by 48.5m (buildings 02-01/02) and 36.8m by 42.2m (buildings 02-03/04). The Sound Studios to the south of Access 3 site two of the would be sited closer to Langleybury Lane with the support buildings sited behind. To the north of Access 3, the support space would front Langleybury Lane with the Sound Stages behind. Production office space would also be provided adjacent to the Sound Studios.
- 3.19 A backlot would be provided to the rear of the Sound Stages (Area 09-01). This would occupy an existing plateau in the land measuring 300m in width and would project 135m beyond the sound stages (290m beyond the boundary with Langleybury Lane) and will be formed of hardstanding. The site sections indicate that this area will include an increase in height by a maximum of 2m to the east to provide a level surface. This area will be used for the construction of temporary film sets and will include temporary set builds, storage, external hoarding to screen the sets and temporary lighting, including lighting cranes. It is proposed that the temporary sets have a maximum height restriction of 20m. A parameter plan has been submitted detailing limitations of development within the proposed backlot. A level area (area 11-02) to the rear of the support buildings (03-08/10) for parking and internal access would be provided; the sections indicate that this area would be increased in height by a maximum of 3.5m to provide a level platform.
- 3.20 Landscaping
- 3.21 The development would include hard and soft landscaped features throughout the site, as shown on the submitted masterplan drawing. The land to the east between the proposed built form and the River Gade is to be retained as open space with improvements proposed. Existing footpaths are to be improved and new publicly accessible footpaths are proposed to be provided. These aspects fall within the Outline elements of the proposal and as such are indicative only. The indicative layout plans detail that all elements of the site will be connected via internal walk, cycle and vehicle routes.
- 3.22 The detailed part of the application includes the areas of hard landscaping which would be provided including the parking areas as set out above. New pathways would also be created around Langleybury House and the Walled Garden with the hardsurfacing within the existing farm area largely retained. Although landscaping is reserved, a detailed landscaping proposal has been provided as shown on Plan DE509_300 which includes orchard trees, wildflower areas and planting of new trees.

3.23 Amendments

3.24 The scheme has been revised since the preliminary report was presented to the March 2023 Planning Committee meeting. The revisions to the scheme include:

- Red line boundary amended to ensure that its extent extends to Langleybury Lane at the proposed access points;
- Removal of a single building (ref: 12-02) within the historic core;
- Reduction in the number of buildings proposed in the Craft Zone in order to create space around the E-Shaped Barn, resulting in a reduction of 6% GEA in the Craft Zone;
- Creation of a new green courtyard in front of the E-Shaped Barn, enabling a visual and physical link to the historic core of the site to be made;
- The education/commercial building has been significantly (47%) reduced in area, lowered in height (reduced to 1-2 storeys) and positioned further back from the brow of the hill to ensure the prominence of the mansion house is retained;
- The green break/valley between the Craft Zone and the south site has been significantly increased – the building to building distance has increased from 108m to 263m as part of this resubmission;
- Removal of a proposed production office building (ref: 04-01) within the south site;
- Number of sound stages within the main section of the south site reduced by 50%, down from 4 to 2;
- The 2 sound stages, together with the adjacent 2 storey production offices, located in the southernmost part of the site are now positioned on Langleybury Lane in order to reduce their impact when viewed from the parkland. They are both built into the ground by approximately 3.5m in order to present as low a frontage as possible to the lane; and,
- Total number of support workshop buildings is reduced from 20 down to 11 but, as a result of altering their configuration, the number of available units has been maintained at 22. These are also built into the ground in order to minimise their perceived height from Langleybury Lane.

3.25 Further amendments were received in July 2024. The amendments are just to the sound stage development to the most southern part of the site – the development located to the south of Access 3. The amendments include:

- Removal of the plant area; to the south of Access 3;
- Re-siting the two southern studios 27m away from the southern boundary of the site; adjacent to the M25 access road;
- Reduction in the indicative scale of the two studios to the south of Access 3 to measure 36.8m in width by 42.2m in depth a 5.2m reduction in width and 6.3m reduction in depth.
- Removal of the southern support building reducing the total number of support buildings to 10;
- Reduction in depth of the back lot through the removal of the eastern projecting spurs and 24m reduction in depth of the parking and access route to the east of the support buildings – these changes would result in resultant grading of the adjacent land levels and soft landscaping features.

3.26 In September 2024, further amendments were made to the development proposed to the southern part of the site. In particular, the height of the support buildings has been reduced by 1m. Furthermore, additional tree planting is now proposed along the boundary between the site and Langleybury Lane to provide additional screening of the development. The

screening will comprise hedging and trees, with a blend of deciduous and evergreen species and it will be maintained at a greater height than originally proposed. Further clarity has also been given regarding the extent of Green Space which is required to achieve the Biodiversity Net Gain (BNG) and will remain undeveloped on that basis.

3.27 The application is accompanied by the following documents which have been taken into account as part of this assessment:

- Environmental Statement which has been amended to reflect the revised scheme

Volume 1 – Main Technical Assessments covering the following areas: Scope, Methodology and Consultation; Site and Scheme Description; Landscape and Visual; Ecology and Nature Conservation; Cultural Heritage; Transport; Noise and Vibration; Air Quality; Socio-Economics; Water Environment; Climate Change and Resilience; Ground Conditions; Archaeology; Soils; Cumulative Residual Effects; Mitigation and Monitoring

Volume 2 – Technical Figures and Appendices including the following documents (these have been revised where applicable):

- Landscape and Visual Impact Assessment (Appendix D)
- Lighting Assessment (Appendix 7) – Amended document
- Ecological Survey Assessments (Appendix E)
- Arboriculture Report (Appendix E)
- Veteran Tree Assessment (Appendix E)
- Historic Buildings Report (Amended) (Appendix F)
- Transport Assessment (Appendix G)
- Travel Plan (Appendix G)
- Noise and Vibration Assessment (Appendix H)
- Air Quality Assessment (Appendix I)
- Flood risk Assessment (Appendix K)
- Energy Statement (Appendix L1)
- Ground contamination Report (Appendix M)
- Archaeology Desk Based Assessment (Appendix N)
- Geophysical Survey Report (Appendix N)
- Agricultural Land Classification Report (Appendix O)
- Soil Assessment (Appendix O)
- Soil Carbon Assessment. (Appendix O)

Volume 3 – Non-Technical Summary.

3.28 The application is further accompanied by the following documents:

- Design and Access Statement
- Planning Statement; Planning Statement Addendum
- Statement of Community Engagement
- Socio- Economic Assessment
- Health Impact Assessment
- Waste Strategy and Site Waste Management Plan
- Materials and Waste Assessment
- Green and Blue Infrastructure Strategy
- Outline Nature Recovery Plan
- Energy Statement
- Sustainability Statement
- Arboriculture Report
- Social Value Briefing Note
- Proposed Draft Heads of Terms (Terms have not been agreed)

- Education and Training Briefing Note
- Planning Benefits and Very Special Circumstances Note

4 Consultation

4.1 Summary of Statutory Consultation (All comments found in **Appendix 1**):

Abbots Langley Parish Council	1.1.1	Object
Three Rivers District Council - Landscape Consultant	1.1.2	No objection
Three Rivers District Council – Tree and Landscape Officer	1.1.3	No objection on tree grounds
Three Rivers District Council - Conservation Officer	1.1.4	Object
Historic England	1.1.5	Comment
Victorian Society	1.1.6	No comments received
National Amenity Societies	1.1.7	No comments received
Dacorum Borough Council	1.1.8	No objection
Watford Borough Council	1.1.9	No comments received
Environment Agency	1.1.10	No objection
Canal and River Trust	1.1.11	No objection
Hertfordshire County Council – Highways Authority	1.1.12	No objection
National Highways	1.1.13	No objection
Hertfordshire County Council – Footpath Section	1.1.14	Information
Hertfordshire County Council – Archaeology	1.1.15	No objection
Hertfordshire County Council – Lead Local Flood Authority and TRDC's appointed Drainage Consultant	1.1.16	No objection
Hertfordshire County Council – Minerals and Waste	1.1.17	No objection
Hertfordshire County Council – Property Services	1.1.18	No objection
Hertfordshire County Council – Public Health	1.1.19	No comments received
Hertfordshire County Council – Forward Planning Department	1.1.20	No comments received
Hertfordshire County Council – Ecology	1.1.21	No comments received
Herts and Middlesex Wildlife Trust	1.1.22	No objection
Natural England	1.1.23	No objection
Three Rivers District Council – Development Plans	1.1.24	No objection
Three Rivers District Council – Transportation and Parking	1.1.25	No comments received
Three Rivers District Council – Environmental Health Officer (Residential)	1.1.26	No objection
Three Rivers District Council - Environmental Health Officer (Commercial)	1.1.27	No objection
Affinity Water	1.1.28	No objection
Thames Water	1.1.29	No objection
British Pipeline Agency	1.1.30	No objection
National Grid	1.1.31	No comments received
Sarratt Parish Council	1.1.32	No comments received
National Planning Casework Unit	1.1.33	No comments received
Comments received from Local Groups and Organisations		
Chandlers Cross Residents Association	1.1.34	Object
The Countryside Charity Herts	1.1.35	Object
The Chilterns Society	1.1.36	Object

Herts Film Office	1.1.37	Support
University of Hertfordshire	1.1.38	Support
Creative England	1.1.39	Support
National Film and Television School	1.1.40	Support
Screen Skills	1.1.41	Support
British Film Commission	1.1.42	Support
British Film Institute	1.1.43	Support
Herts Local Enterprise Partnership	1.1.44	Support
Abbots Langley Neighbourhood Plan Steering Group	1.1.45	Support
Watford and West Herts Chamber of Commerce	1.1.46	Support

5 **Public/Neighbour Consultation**

- 5.1 **Site Notice:** Expired 12 December 2022 (a number of site notices were displayed around the perimeter of the site); Site Notice for amended scheme expired 11 September 2023.
- 5.2 **Press Notice:** Expired 18 December 2022; Press notice on consultation of amended scheme expired 11 September 2023
- 5.3 Number of neighbours consulted: 49 were initially consulted and 90 were consulted on the amended plans.
- 5.4 **Number of responses:** 48 (16 objections; 25 support; 1 Neutral)
- 5.5 Objections

Support the many benefits however points need addressing. Development would increase volumes of traffic along an already busy and fast road. Speed calming measures are required; Existing traffic lights cause significant queues up Langleybury Lane; Car park would lead to a large number of cars entering and exiting the road to the school, how will they be supported to enter and exit Langleybury Lane where sight lines are blocked; Bollards along verges would stop parking; Access from A41 should be developed; Trees should be replaced; Overdevelopment; Urban development on Green Belt land will damage landscape for ever; Destruction of the valley and wonderful heritage; Additional traffic; Claims for special circumstances are unsubstantiated; Do not know who the specific occupiers will be; Should be considered alongside Warner Bros which will result in extensive industrialisation of Green Belt land; Hunton Bridge already have experienced the intrusive sound stages and messy backlots; Very little Green Belt left in Hunton Bridge/Langleybury; Visual impact would be great with development clearly visible from A41 and M25; Not all parts of site will remain in Green Belt; Does not include proof of the methodology for claims of biodiversity; Will not bring employment this is evidenced by Warner Bros.; Additional traffic will be safety risk for children; Support demolition of school and renovation of the mansion but film hub will not be open to public; Adverse effect on Listed Building, conservation area and trees; Road will not be able to cope with traffic; Site has already changed; No justification of very special circumstances for speculative proposal; Will destroy views and character of west side of Gade Valley with industrial buildings; 18m high buildings will be very visible from viewpoints around the valley and will dominate skyline; Will push back Green Belt and open up for future infill; Light pollution; Will destroy rural view as set out in neighbourhood plan; Lack of information on sound stages or backlots; Covenants to prevent future development down the valley welcomed; Additional traffic to Langleybury Lane and surrounding roads; Should avoid building on fields in times of drought; proposed water storage will prevent water reaching aquifers; Overshadowing; Sympathetic development of the brownfield part of the site could be achieved; Should demand full information on scale of development from view points which will be affected by the proposal; Large area will not be opened up to the public; Noise pollution; Will remove all views along Langleybury Lane; Incursion into Green Belt; Too close to boundary; Current

traffic levels from existing use are excessive; Poor visibility; Large impact on pedestrian, equestrian and cyclist amenity and safety; Traffic report are inadequate; Lane could not cope with HGV traffic; Green Belt land in Hunton Bridge and Langleybury has been reduced; Not acceptable to spoil both sides of the valley; Will lead to increases in traffic along the A41; Following the granting of permanent permission for Warner Bros to use the UPPER GREEN BELT off Gypsy Lane the application is wholly inappropriate; The Green Belt in Hunton Bridge/Langleybury area has been severely reduced; Is it acceptable to ruin both sides of the valley with unpleasant sound stages; Hope TRDC will stand up to big business and reject the proposal; Hope Committee will have consideration for the destruction of green fields and established trees; This land is part of a dwindling Green Belt to have the same destruction as Warner Bros half a mile away is soul destroying; There will be no local benefit to the scheme and more traffic created by the incoming employees; Application should be considered in light of the recently lost Green Belt through approval of application 22/0491/FUL; This is the last walkable area of open green space from Hunton Bridge; Both light and emission pollution will be excessive; Permission is not needed; Unacceptable to lose both sides of a beautiful valley; Langleybury Lane is a lane that was widened to serve the gravel pits; A41 already busy at Hunton Bridge traffic lights and short way from M25; Existing create extreme traffic at times and coloured flags; Warner Bros. is a blot on the horizon; Do not want more film studios and hubs in the area;

Comments received after amendments were received and further consultation undertaken

Even a reduced development will still present significant issues of damage to the Green Belt, destruction of skyline view and setting a precedent for future infill developments in the area; Damage to the valley would be catastrophic; Development will impact on the climate even more; Support restoration of historic parts of site cannot see why large sound stages are an appropriate development of this site; No justification that 'very special circumstances' apply for this development in the Green Belt. Green Belt is even more valuable here due to the industrial development of the east side of the valley; Industrial development should not be allowed; Rural nature of Gade Valley will be destroyed; Sympathetic redevelopment of the brownfield parts of the site might have merit but ribbon development along Langleybury Lane will create an industrial eyesore and obliterate local views; Possibility of developing down the slope is still there; Legal covenants preventing future expansions of the slopes should be included; Draft Neighbourhood Plan include a locally significant view including the site; 17m high buildings will dominate the valley; Claims will not be visible are disingenuous and will be significant eyesores; Visual impact analysis underplays the value of the local views and the numbers of people who walk and cycle the area; Still object to the revised scheme; Sound stages of revised scheme are larger than previously proposed; Still inappropriate development in the Green Belt without very special circumstances; Damage skyline views and light pollution; Out of character and create potential for infill developments; Still generate significant vehicular movements and traffic; Still object to the revised scheme which does not alleviate the significant issues presented for the Green Belt; Reduced scope has not addressed significant issues presented by the proposal; No justification for a blight of stages and backlot on East side of the rural valley; Valued openness and established trees would be destroyed; Industrial- sized eyesore of a development; Destroy a precious part of inheritance; Proposal will incontrovertibly and irreversibly damage the area from social, environmental and logistic perspectives; Contrary to policy; Members should be mindful of the devastating effects of Warner Bros. Development to the local area including light pollution, destruction of habitat, nuisance noise to local residents and unwelcome security patrols in residential roads; Current proposal would compound those problems; Amended scheme is watered down version; Will impact on residents of Chandlers Cross; Signposting vehicular route would not prevent people using the fastest or shortest routes including the narrow lanes; If allowed there is nothing to prevent subsequent planning applications here in future; Subsequent owners could use the site for warehousing or other commercial purposes;

Support much needed training facility to support the ever growing motion picture industry in the UK; Will support infrastructure and operations of the film and TV industry complementary to the sound stages being built elsewhere; Will provide space for smaller independent productions that are squeezed out of space by long term takeover deals; Will allow the film industry to grow in a sustainable manner; Lack of film space in the south east; Good location; Herts is perfectly positioned to respond to demand; Would preserve the heritage asset which is a great filming asset; Film and TV Sector is a major contributor to the UK creative industries economy; Supply of studio space is not in line with growth; Film hub responds to the shortage of dedicated blended space; Support long term employment; Training will ensure industry will benefit local people; Will provide complementary development; The UK film and TV sector generates jobs, building skills and creates opportunities for young people; UK needs to expand the infrastructure; Allow restoration of the mansion; allow purpose built children's farm that will benefit school and local families; Parking will help school and traffic problems; will provide a place for people to learn and will respect local wildlife by maintaining green space; Site is within 30 minutes drive of 75 sound stages; Particular need for ancillary space; Will provide vocational experience opportunities; Will benefit local area and UK economy; Film industry also brings in tourism; Well placed to serve major studio productions and smaller domestic ones; In favour of additional parking; Siting of farm closer to school will cement close links and provide improved educational facilities; Café at farm for visitors; Will provide exceptional opportunity to support community, environment and create employment; Supported by Sunnyside Rural Trust and will be involved in the workings of the Walled Garden; Langleybury School Alumni support scheme.

Comments received after amendments were received and further consultation undertaken

Revised proposals reduce the visual impact; Will result in improved Biodiversity; Would like to remain on site; Langleybury Cricket Club (LCC) remain fully supportive of the application and are excited about working with the Applicants to ensure that LCC secures its future and an active and vibrant focal point within the community; Trustees of Langleybury Childrens Farm support the proposed development and replacement farm would be in keeping with their current family fun, educational feel and provide best enclosures and environments for the animals; Sunnyside Trust support the proposal and will be managing parts of the film hub development which will offer activities engaging and employing your people and adults with learning disabilities, wider vulnerabilities from the local community; Environmental benefits from the scheme; St Pauls C of E Primary School support the provision of the farm closer to the school and inclusion of a class room, additional pathways, car park which will facilitate pick up and drop off and exposure to long-term careers; Would like improvement of pathways around the school to further enable a safe route to school from the car park; There is a sustained demand for new and better quality production space in the UK and there will be demand for the facilities being proposed at Langleybury; The space for smaller independent productions will be beneficial as will the support to be provided to the training crew and providing opportunities for local people; The provision for purpose-built space for supply chain companies is welcomed and development will provide for local employment; Warner Bros supports this application;

5.7 Neutral

Overall support the application provided the children's farm is updated and either moved; Farm should not be destroyed without moving the animals and farm workers to a new location and have the same level of standard; Development should have facilities for general public, café, good meals or even a pub; Local people deserve money to be invested and spread wide, rather than just film makers.

6 Reason for Delay

6.1 The application has been extended beyond its original statutory determination period in order to enable the applicant to work with statutory consultees to address their objections.

7 Relevant Planning Policy, Guidance and Legislation

7.1 Legislation

7.1.1 Planning applications are required to be determined in accordance with the statutory development plan unless material considerations indicate otherwise as set out within S38(6) Planning and Compulsory Purchase Act 2004 and S70 of Town and Country Planning Act 1990).

7.1.2 S66 of Planning (Listed Buildings and Conservation Area) Act 1990 requires LPAs to have special regard to the desirability of preserving the listed buildings or their settings or any features of special architectural or historic interest which they process.

7.1.3 Other relevant legislation includes the Localism Act 2011, the Growth and Infrastructure Act 2013 and the Levelling Up and Regeneration Act 2023.

7.1.4 The Wildlife and Countryside Act 1981 (as amended), the Conservation of Habitats and Species Regulations 2010, the Natural Environment and Rural Communities Act 2006 and the Habitat Regulations 1994 may also be relevant.

7.2 National Planning Policy Framework and National Planning Practice Guidance

7.2.1 In December 2023 the revised NPPF was published, to be read alongside the online National Planning Practice Guidance. The NPPF 225 is clear 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”. Chapters 2 (Achieving Sustainable Development), 4 (Decision-making), 5 (Delivering a sufficient supply of homes), 6 (Building a strong, competitive economy), 9 (Promoting sustainable transport), 13 (Protecting Green Belt land), 15 (Conserving and enhancing the natural environment), 16 (Conserving and enhancing the historic environment) are relevant to the planning merits of the proposed development.

7.2.2 The NPPF states that: ‘Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.’ The NPPF Chapter 2 retains a presumption in favour of sustainable development. This means, in summary and as relevant, approving development proposals that accord with an up-to-date development plan without delay or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting planning permission unless Green Belt policy provides a clear reason for refusing the development proposed or any adverse impacts would significantly and demonstrably outweigh the benefits when assessed against the policies of the NPPF taken as a whole.

7.3 The Three Rivers Local Development Plan

7.3.1 The application has been considered against the policies of the Local Plan, including the Core Strategy (adopted October 2011), the Development Management Policies Local Development Document (adopted July 2013) and the Site Allocations Local Development Document (adopted November 2014) as well as government guidance. The policies of Three Rivers District Council generally reflect the content of the NPPF.

7.3.2 The Core Strategy was adopted on 17 October 2011 having been through a full public participation process and Examination in Public. Relevant policies include Policies CP1 (Overarching Policy on Sustainable Development), CP6 (Employment and Economic Development), CP7 (Town Centres and Shopping), CP8 (Infrastructure and Planning

Obligations), CP9 (Green Infrastructure), CP10 (Transport and Travel), CP11 (Green Belt) and CP12 (Design of Development).

7.3.3 The Development Management Policies Local Development Document (DMLDD) was adopted on 26 July 2013 after the Inspector concluded that it was sound following Examination in Public which took place in March 2013. Relevant policies include DM2 (Green Belt), DM3 (Historic Built Environment), DM4 (Carbon Dioxide Emissions and On Site Renewable Energy), DM6 (Biodiversity, Trees, Woodland and Landscaping), DM7 (Landscape Character), DM8 (Flood Risk and Water Resources), DM9 (Contamination and Pollution), DM10 (Waste Management), DM11 (Open Space, Sport and Recreation Facilities and Children's Play Space), DM13 (Parking) and Appendix 5 (Parking Standards).

7.3.4 The Site Allocations LDD was adopted in November 2014. Policies SA1: Site Ref: (H(7) (Langleybury House/School) and SA7: Langleybury and The Grove are relevant.

7.3.5 The adopted Langleybury and The Grove Development Brief (adopted June 2012) is also relevant to this application.

7.4 Other relevant considerations

7.4.1 Hunton Bridge Conservation Area Appraisal (July 2008).

7.4.2 The Community Infrastructure Levy (CIL) Charging Schedule (adopted February 2015).

8 Planning Analysis

8.1 Principle of Development – Economic Development

8.1.1 As stated within the NPPF (paragraph 7) 'The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner'. The NPPF (paragraph 8) identifies that the planning system has three overarching objectives:

- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

8.1.2 The Place Shaping Policies of the Core Strategy follows the Spatial Strategy which provides the direction for how future development is provided. The intention of the Spatial Strategy is to strike a balance between retaining urban sprawl, enhancing the countryside, and meeting needs in a sustainable way. The spatial strategy identifies the hierarchy of settlements across the District to facilitate in directing growth to the most sustainable and appropriate locations. Taking into consideration the size, function and importance of the Principal Town and Key Centres the Core Strategy identifies that future major development in Three Rivers should be primarily focused in and around these settlements. Abbots Langley is a Key Centre and is considered to be an accessible and sustainable settlement. The application site however falls outside of the settlement boundary of Abbots Langley

with the A41 separating Langleybury Lane from the settlement of Abbots Langley with no direct public transport links along Langleybury Lane. The provision of major development of the scale proposed sited outside of and divorced from the settlement of Abbots Langley would be contrary to the ethos of the Spatial Strategy which seeks to deliver sustainable development whilst restraining urban sprawl and enhancing the countryside (discussed in more detail within this report).

8.1.3 The NPPF supports economic growth; paragraph 85 states:

‘Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.’

8.1.4 Core Strategy Policy CP6 support employment and economic growth within Three Rivers, consistent with the objectives of the NPPF, stating:

The Council will support development that:

- a) Sustains parts of the District as attractive areas for business location
- b) Provides an appropriate number of jobs to meet strategic requirements
- c) Promotes skills and learning of the local workforce
- d) Provides for a range of small, medium and large business premises
- e) Reinforces the south-west Herts area’s existing economic clusters including film, printing and publishing, telecommunications and construction
- g) Aligns economic growth with housing growth in the area in order to balance the provision of homes and jobs and reduce out-commuting
- h) Retains overall levels of industrial and warehousing floorspace in the District and adopts a more flexible approach to the release of office floorspace for other uses

The sustainable growth of the Three Rivers economy will be supported by:

- j) Continuing to focus employment use within the key employment areas within the District: Leavesden Aerodrome, Croxley Business Park, Tolpits Lane, Maple Cross/Maple Lodge, Kings Langley Employment Area, Carpenders Park West, Rickmansworth Town Centre
- k) Ensuring that employment uses are accessible through a range of transport modes including by public transport
- o) Generally retaining general industrial and warehousing space in employment use, but recognising opportunities for relocation or mixed use redevelopment of industrial and warehousing space where this would contribute to wider sustainability objectives and would not harm the overall economic performance of the District.

8.1.5 Core Strategy Policy CP6 (e) supports development that reinforces the south-west Herts economic cluster including film. The provision of development that supports existing clusters is also supported by the NPPF (paragraph 87) which states ‘Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks’ including creative industries.

8.1.6 The growth of the film industry within Hertfordshire is also supported by the Hertfordshire Local Enterprise Partnership which has published the Film and TV Production Sector Action Plan (September 2022). The Action Plan sets out 6 key objectives:

- 1) A reliable supply of talent consistent with the scale of studios;
- 2) Novel Business models across the wider ecosystem;
- 3) Net Zero Outcomes;

- 4) Commercial property solutions for film and TV production (including the wider supply chain);
- 5) Outstanding digital infrastructure for film and TV production;
- 6) Hertfordshire as a location for film and TV production which is recognised around the world, promoted effectively and valued fully.

8.1.7 This application is multi-faceted including providing a relocated Children's Farm, a training/educational facility, provision for locational filming within the existing house and Listed Barn, a craft zone providing workshops and small scale industrial space, office space, support and studio space and backlot. In relation to how the development would reinforce the existing filming industry within Three Rivers and wider South West Herts cluster the Planning Statement (paragraph 3.18) states:

'This proposal seeks to do something different to a pure film studio, instead looking to create a facility that is multi-faceted and offers a collection of facilities which service the needs of the film industry beyond just sound stages. In this respect the site would not compete with existing studios but complement them and help address a significant unmet demand.'

8.1.8 The proposed development has support from the creative industry as identified within the comments received and the evidence details that the current scheme has been informed by the successful use of the mansion and school buildings for filming. The proposal would offer a collection of facilities which, as identified within the Hardisty Jones appraisal commissioned by TRDC which considers the economic impacts of the proposal, would serve the wider need of the film industry. This scheme proposes to complement rather than compete with the existing larger studios.

8.1.9 In terms of economic benefits and job creation the supporting evidence identifies that the operational phase of the proposed development would generate an estimated £93.3 million Gross Value Added, 845 direct jobs (390 direct FTEs permanently on site and 455 direct FTEs within the film and TV Production sector) and 695 indirect jobs. This is in addition to the economic benefits that would be secured through the construction phase of the development; which is anticipated to generate an estimated £70 million in Gross Value Added, 330 direct jobs and 365 indirect jobs. Due to the freelance nature of the filming and TV industry, the employees associated with the production of film and TV are not expected to be permanent on-site employees but would travel to the site for their specific productions. The jobs provided on site would however be wide ranging including the provision of permanent jobs involved with the operation of the site (390 jobs). The craft zone would also provide a permanent base for businesses, and therefore would operate in a different way to the changeable nature of the production and support spaces. The craft zone seeks to provide creative industry supply chain companies a permanent base that will be available for long term lease. Thus, the proposed development would support long term job opportunities on site.

8.1.10 The proposed development also seeks to promote skills and learning in accordance with the Strategic Vision and Core Strategy Policy CP6 through the delivery of the Propellor Building. It is anticipated that the building will predominantly provide space for smaller scale productions that will be sourced and subsidised through an educational facility; the subsidies will be based on the number of students that form the production crew. This will allow graduates or other people with transferrable skills to gain on set/production experience. The proposed use of the Propellor Building would be required to be secured within a Section 106 agreement.

8.1.11 Policy CP6 requires employment uses to be accessible via a range of transport modes including by public transport. The proposed development would be sited within an out of settlement location and not directly accessed by public transport connections along Langleybury Lane. There are bus stops along the A41. The Highways Authority have

confirmed that the provision of a Toucan Crossing along the A41 close to the proposed pedestrian connection with the A41 would improve the connection of users of the site to public transport connections along the A41. The Travel Plan (discussed in detail in paragraph 8.8.10) also seeks to reduce the use of private modes of transport to 70% usage. Notwithstanding these provisions it is not considered that the site is located within a sustainable location and there would be a heavy reliance on private modes of transport, as identified within the Travel Plan with only a proposed future 30% reduction in use of cars. The site and proposed use would therefore be contrary to Policy CP6 of the Core Strategy. The accessibility of the site is discussed further in the Highways Section below.

- 8.1.12 There is an estimated requirement of 21,945 sqm for industrial and warehousing space (or 5.5ha of employment land) in the District. The indicative development would deliver both small and medium sized industrial style units. The Economic Study identifies that there is a severe shortage of small industrial units (up to 1,858 sq.m) within the study area. The Study further identifies that within the study area there is a lack of supply of land suitable for small scale industrial uses in Dacorum, Watford and Three Rivers. It is not considered that the medium sized units (support space and studio space) due to their uses, to be leased for filming and production, would meet this provision for general industry. Although the use of the buildings in the craft zone would be restricted to use by people with an association with the creative industry the Craft Zone, this area would provide small scale industrial units that would provide a permanent base for supply chain companies serving the creative industry and considering they would deliver small industrial units would provide a form of development that would help to meet an identified need.
- 8.1.13 The economic development of the site, employment opportunities, supply of small scale industrial units and training provisions, would accord with economic growth and cluster principles as set out within Policy CP6 of the Core Strategy and NPPF; thus there are no in principle objections to the proposed development in this regard.
- 8.1.14 The acceptability of the proposal would however be required to be assessed in relation to all other material planning considerations including, but not limited to, Green Belt, Heritage, landscape and sustainability in accordance with the Development Plan and National Policies.

8.2 Principle of Development - Residential Allocation

- 8.2.1 Policy SA1 (Site H7 Langleybury House / School) of the Site Allocations Document identifies the replacement of the existing school buildings with 20 dwellings where the existing school is sited. This land is registered as a brownfield site (not including the mansion house or any of the listed buildings). The projected housing delivery date set out within the Site Allocations Document was 2016-2020. The housing has not been delivered within the estimated time period, and planning permission has not been sought for the housing delivery.
- 8.2.2 Three Rivers can currently only demonstrate a 1.9 year housing land supply, well below the requisite five year supply, and there is a pressing need for housing and affordable housing within the District. The delivery of up to 20 dwellings with 45% of affordable housing on a brownfield site would make a material contribution to meeting the objectively assessed need for housing.
- 8.2.3 In relation to housing delivery Policy SA1 of the Site Allocations Document states:
- ‘Permission will not be granted for development resulting in a net loss of housing unless conversion to other uses is necessary to provide a small-scale facility and provided the surrounding residential area is not significantly adversely affected.’
- ‘Allocated housing sites will be safeguarded for housing development.’

8.2.4 The NPPF also supports housing delivery; paragraph 60 of the NPPF states:

‘To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet as much of an area’s identified housing need as possible, including with an appropriate mix of housing types for the local community.’

8.2.5 The Planning Statement identifies that the proposal would be a departure from the Development Plan. In support of the proposal with regard to the loss of the allocated housing site the Planning Statement (paragraph 5.80) states:

‘This is an aged allocation that dates back to 2014, with no application having been submitted for residential use in the intervening period. There is also no intent to bring this application forward, particularly in the context of the current LFH proposal. Notwithstanding this, material considerations can plainly outweigh conflict with a Development Plan and we consider that this is true in this instance where a multi-faceted proposal offering significant benefits is now proposed.’

‘As a final thought on this, the key consideration must be about how best to secure the future of the Langleybury Estate, acknowledging the Council’s stated belief that there is a defined “need for change” in this location. The LFH proposal is a genuinely transformative one, offering as it does the chance to do deliver a full spectrum of benefits and assist in achieving wider regional objectives such as those of the Hertfordshire LEP who recognise the importance of the film and television production industry to the region and consider its growth an opportunity that cannot be missed. To prioritise a small scale housing allocation over this would be short sighted and represent a missed opportunity to deliver wider objectives with greater benefits to the residents of Three Rivers’.

8.2.6 Whilst a balance between economic growth and housing delivery needs to be made, the fact that part of the site where the development would be located is an allocated housing site within the existing Development Plan is a material consideration. Taking into account the acute need for housing and affordable housing within Three Rivers and the 1.9 year housing land supply, the loss of an allocated site for housing would be contrary to Policies CP1 and CP2 of the Core Strategy, Policies SA1 and SA7 of the Site Allocations LDD and the NPPF which seek to ensure the delivery of housing within Three Rivers to meet identified needs.

8.3 **Principle of Development - Development of Langleybury**

8.3.1 Policy SA7 of the Site Allocations DPD relates to development at Langleybury and The Grove and states:

‘Appropriate uses on the Langleybury site are hotel/leisure development and residential, and the continuation of agricultural uses remains appropriate.’

‘Proposals for the development of the Langleybury and The Grove sites should be in accordance with the adopted Langleybury and The Grove Development Brief (2012) and any subsequent revisions.’

8.3.2 The adopted Langleybury and The Grove Development Brief (June 2012) sets out the development parameters for future development at Langleybury and The Grove. It has not been revised since its adoption but is generally consistent with the NPPF. Although the Development Brief was adopted in 2012 and the aspirations of the site have changed, it remains an adopted document that holds weight and is a material consideration in the assessment of development within the Langleybury Estate and adjacent farm; not least since the aspirations within the document seek to deliver much needed housing alongside

an appropriate long term use for the mansion. The Development Brief identifies that 'At Langleybury hotel/leisure development is the preferred use, but residential use would also be appropriate. Where practical and feasible an element of housing development should complement any hotel / leisure development. The continuation of farming and agricultural uses (including the children's farm) on the Langleybury site remains appropriate'.

8.3.3 The Brief further identifies that:

'The inter-dependant development objectives for both sites are to:

- Significantly reduce the impact of the former Langleybury School on the Green Belt openness and landscape
- Create an enduring use for Langleybury House and result in the restoration and enhancement of this heritage asset
- Enhance the tourism infrastructure which will complement and support Leavesden Studios
- Result in significant economic benefits in terms of capital investment, additional direct and indirect employment and additional supply chain benefits
- Contribute to meeting housing needs, insofar as is necessary and suitable'

8.3.4 The assessment of impact on Green Belt and restoration and enhancement of heritage assets will be discussed in the relevant sections of this report. The proposed development however would result in economic benefits, create direct and indirect jobs and provide a place for supply chains associated with the wider SWH filming hub. The proposed development of Langleybury would not directly enhance the tourism infrastructure; however it is noted that this brief relates to both Langleybury and The Grove. The proposed development would also not contribute to meeting housing needs; as previously discussed.

8.3.5 The proposed development by virtue of its use and scale would far exceed the spatial and other development limitations identified within the Development Brief and would fail to deliver any housing. The proposed development would thereby be contrary to Policy SA7 of the Site Allocations DPD and the Langleybury and The Grove Development Brief.

8.4 **Green Belt**

8.4.1 The proposed development would be located in the Metropolitan Green Belt beyond the urban limits of Abbots Langley to the west of the A41. The National Planning Policy Framework (NPPF) sets out that the Government attaches great importance to Green Belts and that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; and that the essential characteristics of Green Belt are their openness and their permanence. The NPPF at paragraph 143 sets out that Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

8.4.2 Paragraph 152 of the NPPF sets out that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

8.4.3 Paragraph 154 of the NPPF identifies that the construction of new buildings should be regarded as inappropriate in the Green Belt; however, the paragraph sets out the following exceptions to this:

- a) buildings for agriculture and forestry;

- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) limited infilling in villages;
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
 - not have a greater impact on the openness of the Green Belt than the existing development; or
 - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

8.4.4 Paragraph 155 of the NPPF states that:

‘Certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it.

These are:

- a) mineral extraction;
- b) engineering operations;
- c) local transport infrastructure which can demonstrate a requirement for a Green Belt location;
- d) the re-use of buildings provided that the buildings are of permanent and substantial construction;
- e) material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and
- f) development brought forward under a Community Right to Build Order or Neighbourhood Development Order.’

8.4.5 Core Strategy Policy CP11 sets out that the Council will maintain the general extent of the Green Belt in the District and will “encourage appropriate positive use of the Green Belt and measures to improve environmental quality. There will be a presumption against inappropriate development that would not preserve the openness of the Green Belt, or which would conflict with the purpose of including land within it”. Development Management Policy DM2 notes that “As set out in the NPPF, the construction of new buildings in the Green Belt is inappropriate with certain exceptions, some of which are set out below”. Relevant to this current application is (a) New Buildings, which states: “Within the Green Belt, except in very special circumstances, approval will not be given for new buildings other than those specified in national policy and other relevant guidance”. Policy DM2 was adopted prior to the publication of the current NPPF. However, it was adopted after the publication of the original 2012 NPPF, and the Green Belt policies in the NPPF are not materially different between the two. It is considered, accordingly, that Policy DM2 is in accordance with the current NPPF (12/2023) in this regard and should be afforded full weight in the planning balance.

8.4.6 The Spatial Vision and Strategic Objectives of the Core Strategy which seek to limit changes to the Green Belt and to accommodate some growth required in locations which result in the least harm to Green Belt are considered to be in general accordance with the NPPF

which seeks to protect the Green Belt from inappropriate development and preserve its openness permanently.

Inappropriate development

- 8.4.7 Although some elements of the application proposals are detailed and some are for outline consent, the principle of acceptability of the proposed development in Green Belt will be considered as one.

Northern Development (Childrens Farm and Parking Area)

- 8.4.8 The Childrens Farm would be located on open undeveloped agricultural land which is currently used as grazing land. Petting/childrens farms do not fall under the definition of agriculture and as such the buildings used to serve the Children's Farm would constitute inappropriate development in the Green Belt. The change of use of the land and the buildings and hardstandings associated with the works required to accommodate the farm (not including the grazing land) would involve a loss of the openness of this part of the Green Belt contrary to the fundamental aim of Green Belt policy.
- 8.4.9 The parking area to the north would introduce an area of hardstanding, lighting and a more intensive active use above that of the existing agricultural use as a field for grazing. The change of use of this land and the engineering operations to facilitate parking of vehicles would not preserve the openness of the existing site where the development would be located and would represent inappropriate development.

Cafe

- 8.4.10 The existing structures within the walled garden would be demolished and replaced with a single café building. Although the existing structures are ad hoc in layout and significant in number these structures are predominantly low level and inconspicuous in the landscape and street scene and reflect the current low key use of this part of the site as a Children's Farm. Although the café would be sited behind the existing historic wall it would result in a single larger scale building than the smaller structures to be removed and would be served by large areas of hardstanding. The building would not be in the same use as the existing buildings and the proposed structure would be sited in an open part of the site away from the existing built form. The siting of the building relative to the existing built form, use and scale of the proposed café would therefore represent inappropriate development.

Development within the established Agricultural Unit

- 8.4.11 The land and built form (including hardstanding) that benefits from agricultural use does not fall within the definition of previously developed land within the NPPF. In light of this all of the proposed built form within the agricultural unit (the proposed development forming the craft zone and office buildings) would constitute inappropriate development.

Educational Area (Propellor Building)

- 8.4.12 The Propellor Building would consist of to small scale film studios with links to an educational facility that would allow students to gain on set professional experience (ground floor) and ancillary space at first floor including office space. This building would replace the existing educational buildings and would be sited on the designated brownfield site thus would be sited on the previously developed part of the application site. The resultant built form of this part of the site would be notably reduced in comparison to the existing built form and openness would be improved at this part of the site. As such the Propellor Building would consist of redevelopment of previously developed land and would meet criterion (g) of the paragraph 154 of the NPPF.

Development to the South (Support Space, Studios and Back Lot)

- 8.4.13 The studio and support space to the south of the site would constitute new buildings on existing open undeveloped agricultural land and as such would constitute inappropriate development in the Green Belt.
- 8.4.14 The backlot to be sited to the rear of the studio space to the south of the site is proposed to provide space for temporary set builds. It is proposed that the set builds be limited to a maximum height of 20m with no time limit for their duration on site. Although the set builds would be temporary in nature this would only be in relation to that fact that the sets would be changeable in height, scale and spread across the proposed backlot. Thus they would in practice create a permanent feature within the Green Belt. In light of this the change of use of this area and engineering operations to change the soft landscaping to hardstanding and increase in land levels would result in greater harm to openness than existing and encroachment into countryside (matters that will be discussed in greater detail below). The change of use to backlot including the hardstanding would therefore represent inappropriate development.

Development considered under Paragraph 155 (change of use and engineering operations)

- 8.4.15 The proposed change of use and engineering operations have been addressed based on the relevant individual elements above. It is however prudent to assess the overall change of use of the application site to a film hub and the associated activity and works proposed including hardstanding.
- 8.4.16 Planning permission 20/1697/RSP granted the temporary use of part of the wider application site for filming up to September 2024; this temporary consent was extended up to July 2027 under permission 24/0666/RSP. The planning unit granting temporary consent is tightly contained around the existing built form and curtilage of the house and all associated buildings and hardstanding are required to be removed following this temporary period. The current proposed change of use of the site, re-use of the buildings including the mansion and agricultural buildings and new buildings to support the site as a film hub on a permanent basis would result in a significant intensification of the use of the site, construction of external buildings, land level changes, hardstanding, lighting and change of use of the agricultural buildings. The impact of the proposed development would be permanent whilst the impacts of the temporary consent, whilst in place for a period of time, would be temporary.
- 8.4.17 The proposed hardstanding and land level changes to accommodate level platforms would comprise an engineering operation that falls under the consideration of paragraph 155 of the NPPF. The areas of hardstanding proposed across the entire site would be significant and result in an urbanising impact and allow greater intensity of use of these parts of the site which would serve to reduce openness through the movement, parking of vehicles of varied scale (cars to HGVs and support vehicles that will be associated with the individual productions) and siting of temporary sets. The associated works as a result of the change of use and engineering operations would result in greater harm to the openness of the Green Belt and result in encroachment of urbanising and harmful development within the countryside thus conflicting the purposes of including land within the Green Belt. The proposed re-use of buildings, change of use and hardstanding would be inappropriate development.
- 8.4.18 In summary the development would represent inappropriate development which, by definition, would be harmful to the Green Belt.

Openness

- 8.4.19 As the development would constitute inappropriate development the impact on openness is a material consideration. Although an assessment of openness has been made in relation to the provision of paragraphs 154(g) (previously developed land) and paragraph 155 of the

NPPF this is in relation to whether the proposal results in greater harm to openness than existing. This section will expand on the assessment of impact on openness.

8.4.20 The essential characteristics of Green Belts are their openness and their permanence (NPPF paragraph 142). The NPPG provides guidance on assessing the impact of a proposal on the openness of the Green Belt (Paragraph: 001 Reference ID: 64-001-20190722) stating:

‘Assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgment based on the circumstances of the case.

‘By way of example, the courts¹ have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:

- openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;
- the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and
- the degree of activity likely to be generated, such as traffic generation.’

8.4.21 Openness relates to the lack of development being present. In spatial terms, openness can be harmed by built development in the Green Belt even if it is not visible from the public or private realm. As noted in the Samuel Smith case, openness: “is not necessarily a statement about the visual qualities of the land, though in some cases this may be an aspect of the planning judgement involved in applying this broad policy concept.”

Northern Development (Childrens Farm and Parking Area)

8.4.22 The Children’s Farm would result in the introduction of built form where currently none exists. The proposed farm building would be sited to the west of St Pauls C of E School in an undeveloped field which is currently used for grazing in connection with the existing Children’s Farm. The proposed building in place of the existing open nature of the site would result in a reduction in openness. Notwithstanding this, from the main vantage points of the built form of the building, it would be viewed against a back drop of a wooded area to the east or the mansion house to the south which is set on higher ground. Subject to the assessment of the overall height and scale of the proposed built form at reserved matters stage it is considered that the resultant loss of openness as a result of the childrens farm may not be significant.

8.4.23 The new car parking area would be sited adjacent to where there is a degree of intensive activity currently at school pick up and drop off time on the land surrounding the field. The use of this field for car parking would change its rural context and have an urbanising influence and would result in the loss of openness of the existing open field through movement and the siting of vehicles within the site.

Curtilage of Mansion, Education and Agricultural Areas

8.4.24 The Propellor Stage Building would replace the existing school buildings where there would be a material reduction of built form and an improvement to the openness of this part of the site.

8.4.25 The development would however result in the addition of a number of industrial buildings with a height of 6.7-8.3m within the open agricultural part of the site which lawfully contains a barn and the E shaped barn (the E shaped barn will be retained). The indicative plans show that the Craft Zone would result in the spread of built form approximately 43m further

¹ R (on the application of Samuel Smith Old Brewery (Tadcaster) and others) (Respondents) v North Yorkshire County Council (Appellant) [2020] UKSC 3.

south and approximately 13m closer to Langleybury Lane. The scale of built form in relation to the existing agricultural buildings, spread of development outside of the existing curtilage of built form and intensification of use would spatially and visually reduce the openness of this part of the site.

- 8.4.26 The proposed café would be sited behind the existing wall; although it would sit higher than the wall it would not materially reduce the visual openness of the site in this location and would result in the removal of a variety of existing structures.
- 8.4.27 Further, a large area of hardstanding to the north of the existing school buildings would be retained. It is expected that this area would be used for parking of cars and larger vehicles, support vehicles (trailers for dress and make up etc) that is consistent with use of sites for filming. Historically this area contained a small parking area but consisted primarily of green space. The hardstanding and use of this part of the site for parking of cars and larger scale vehicles would introduce the siting of urban features that would serve to reduce the visual and spatial openness of this part of the site.

Development to the south

- 8.4.28 The development to the south would introduce built form of industrial scale and design, a backlot, and parking on existing open farm land. The LPA commissioned Stephenson Halliday Landscape Consultants to assess the impact of the development on the openness and purposes of the Green Belt. The assessment identified that the introduction of the proposed buildings, backlot, associated development and intensification of use, including the introduction of vehicles within the site would, have a significant visual impact in terms of loss of openness through the loss of the existing open agricultural land. Amended indicative plans have been received that have further lowered the height of the support and studio buildings to the south, reduced the area of hardstanding at the rear of the most southern part of the site and increased the gap between the proposed buildings and the southern boundary. It is not considered that these amendments serve to overcome the fact that the addition of built form of the scale proposed, in addition to the other elements of the scheme already mentioned and unaffected by the amended indicative plans, would result in the loss of visual and spatial openness of this part of the site.
- 8.4.29 It is noted that additional hard and soft landscaping is proposed within the site and along the boundary with Langleybury Lane. The inclusion of soft landscaping would serve to provide mitigation but would not overcome the visual loss of openness which is commonly taken to be the absence of built development. In the view of the Landscape Consultant the proposed landscaping would help to mitigate views of the proposed development from surrounding public vantage points reducing the visual impact of the development. However, whilst the landscaping would serve to mitigate/obscure views of the built development and associated engineering works from public vantage points, the loss in openness by virtue of the built form, backlot features, and associated paraphernalia and activity would remain visually apparent especially along Langleybury Lane and footpaths to the east. Whilst the impacts would be localised it would be apparent and does not lessen the fact that there would be a resultant loss of openness. Thus, the proposed landscaping would not mitigate the fact that the proposed development would result in the reduction of openness within the Green Belt. Further the intensive landscaping proposed to mitigate the extent of visual harm would, in itself, form a sense of enclosure and reduction in appreciable openness especially along Langleybury Lane. This is identified by Place Services Landscape Consultant who stated: 'There is a strong reliance on mitigation measures such as a hedgerow (to mature up to 4m in height) and 10m tree planting along Langleybury Lane. Although these landscape elements do provide some necessary screening, these measures contradict the current open countryside and parkland views that can currently be experienced and will not fully screen the proposed built form'.
- 8.4.30 Further, the intensification as a result of film and related activity that would be associated with the proposed change of use across the site, when compared to the existing parkland

and agricultural uses of the wider area of site, especially within the agricultural unit and to the south where no built development exists, would result in the loss of the openness of the Green Belt of which it forms part. This would be through significant increase in vehicular movements along Langleybury Lane and within the site, including HGVs, parked cars and lorries within the site and existing open landscape and the siting of paraphernalia associated with filming such as external storage, temporary lighting, fencing, signage and security gates, within the existing open undeveloped landscape. The intensification of use would further diminish the current appreciable open, rural space.

- 8.4.31 The proposed development would therefore result in loss of openness which would have both spatial and visual impacts.

Purposes of including land within Green Belt

- 8.4.32 As identified in paragraphs 142 and 143 of the NPPF the fundamental aim of Green Belt is to prevent urban sprawl by keeping land permanently open to serve the five purposes of Green Belt. The site is physically and functionally detached from the edge of the settlement of Abbots Langley by the A41. In light of its location in open countryside apart from and to the south west of the urban area it is evident that the development would constitute urban sprawl and encroachment in countryside in conflict with NPPF 142 and purpose c of including land within Green Belt in NPPF 143. While the application site is to the north east adjacent to the Hunton Bridge Conservation Area; the proposed development is not considered likely to materially affect the setting for Hunton Bridge or the character or appearance of the area and thus would not conflict with purpose d) of paragraph 143 of the NPPF.

- 8.4.33 As part of the evidence base informing the emerging Local Plan, a Green Belt review was undertaken by amec foster wheeler in 2017. Stage 1 of the Green Belt Review tests the Green Belt in the District against the five purposes set for it in national policy and to determine the extent to which it is contributing to those purposes. The application site sits in Parcel N1 of the review and forms the larger part of this parcel. The Green Belt review describes the parcel as:

'Pasture, woodland and scrub woodland between peripheral road corridors, with medium-distance views across from surrounding roads. Built development (expanded farmstead and other dwellings/structures) exists towards the centres of the parcel, diminishing its sense of openness, in combination with adjacent road corridors, although these are screened and the land retains a reasonably strong sense of open countryside.'

Table 3.1 of the review 'Assessment of Contribution to Green Belt Purposes' describes parcel N1 as 'Open countryside between Watford and the M25, helping to prevent sprawl, merger and encroachment.'

- 8.4.34 The proposed development to the north of the application site would be sited closer to existing built form, including St Pauls C of E Primary School and Vicarage, than elsewhere on the site. Langleybury Lane at this location is used as a pick up and drop off for the school. Although the land on which the development would be sited is generally open in character, the openness of the Green Belt in this location makes a limited contribution to safeguarding the countryside from encroachment by reason of the existing urbanising influences that enclose it. The development in this northern part of the site, therefore, would not materially conflict with this purpose of including land within Green Belt.

- 8.4.35 Taking account of the existing built developed nature of the mansion house, school and children's farm and the central part of the agricultural unit it is not considered that the proposed built form and associated change of use within this location would result in material encroachment into countryside and, as such, it would not conflict with the purposes of including land within Green Belt.

- 8.4.36 The Craft Zone would introduce industrial development of greater scale to the existing built form, would introduce an urbanising form of development relative to the existing agricultural units and would extend beyond the existing developed curtilage of the agricultural unit within the open landscape to the west and south of the existing built zone. The Craft Zone would therefore result in further encroachment of urbanising development into Green Belt where the open character of the land within this location serves to prevent encroachment into the countryside. However, considering its proximity to the existing built development on the site the degree of encroachment on countryside would not be significant.
- 8.4.37 The land to the southern part of the site, that would contain the studio, support space and backlot and internal access road and security building, consists of an open undeveloped countryside landscape with a small scale residential bungalow that compliments the rural character of the surroundings. It is noted that Little Liz (a traveller site) is sited opposite the application site along Langleybury Lane. However, this site consists of low level built form and is inconspicuous in the landscape. It therefore does not serve to detract from the open, countryside setting of the application site. Some views of the school building are appreciated when viewed in a north eastern direction and long range views of the development at Warner Brothers and Abbots Langley to the east are to be had from vantage points along Langleybury Lane. The farm has a built up appearance currently however this is due to the provision of two buildings that do not benefit from permanent planning permission and areas of hardstanding associated with the temporary consent for filming within the school site and farm. The existing situation does not therefore reflect the permanent lawful use and development within this part of the site. The views along Langleybury Lane in a north eastern direction are that of agricultural buildings, the school sited behind the agricultural unit and the historic mansion sited in large grounds. Whilst the existing development within Langleybury may be appreciated within the landscape it does not provide a sense of enclosure or create urbanising influences that would detract from the open rural countryside that characterises the southern part of the application site. The Green Belt review identifies that the Green Belt with parcel N1 which the application forms a large part of, 'retains a reasonably strong sense of open countryside and that the Green Belt in this location serves 'to prevent further incremental change across land which has been intruded by some incongruous built development at Langleybury'.
- 8.4.38 The M25 slip road bounds the far most southern part of the site; however, this is set on lower ground to the site and is unlit such that the visual urbanising influences within the open countryside associated with the M25 slip road are limited to when approaching the bridge along Langleybury Lane and does not introduce a visually urbanising feature within the wider landscape views. Langleybury Lane also bounds the western boundary of the site and this road is a rural road with no lighting. The experience of the southern part of the site as viewed from public vantage points along Langleybury Lane, A41 (from many points) and the footpaths to the east is that of open countryside.
- 8.4.39 The introduction of large scale industrial style buildings and backlot (with associated paraphernalia) on land to the south of the existing built form, would result in the addition of incongruous, urbanising development within open, rural land that, as existing, is visually unaffected by urbanising influences. The proposal would therefore result in the advancement of built form of significant proportions beyond the current limits of development and would represent encroachment of inappropriate development into the countryside / Green Belt. The encroachment of urbanising and harmful development would be exacerbated by the visibly detached nature of the southern development from the existing area of built form, movement and parking of vehicles and lighting in a rural open setting.
- 8.4.40 'The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open' (NPPF 142). 'Sprawl' can be defined as the spread out over a large area in an untidy or irregular way. Although the development is planned in nature by the fact that consideration has been made in relation to the design, location and setting of the buildings forming the southern part of the development, the introduction of large industrial style

development and a large backlot (which would include set builds up to 20m in height, storage containers, temporary lighting, lighting cranes and hoarding to screen) where the siting and proposed type and scale of development is divorced from the settlement of Abbots Langley would appear unplanned and incongruous within this open countryside setting. The development would introduce urban sprawl within the open Green Belt in conflict with the fundamental aim of Green Belt policy. The sprawl of incongruous urbanising development would be exacerbated by the separation of the industrial style development to the south from the existing area of built form to the north. Although it is noted that the Stephanson Halliday Landscape Consultants assessment of the scheme considered that the proposal would not result in unacceptable urban sprawl, for the reasons identified above, it is considered that the development would result in sprawl of urbanising development within the existing open landscape.

- 8.4.41 To summarise the introduction of a significant amount of built form, of industrial scale, on an undeveloped area would inevitably result in a significant loss of openness of the Green Belt causing material harm, as well as harm by inappropriateness. The development would conflict with the Green Belt purpose of safeguarding the countryside from encroachment. Irrespective of whether the identified harm is localised the impact of the development does not overcome the loss of openness or encroachment or that the Framework directs that substantial weight should be given to the Green Belt in the planning balance. The amended plans positioning the development 27m further from the southern boundary does not overcome this harm.
- 8.4.42 The proposed development would, accordingly, be contrary to the Policy CP11 of the Core Strategy, Policy DM2 of the Development Management Policies, the Langleybury and The Grove Development Brief and the provisions of the NPPF. The harm to openness and the conflict with purposes of including land with Green Belt, in addition to the harm by inappropriateness, carries substantial weight against the proposals.

8.5 Impact of proposal on heritage assets

- 8.5.1 The application is required to be assessed in line with the statutory requirement placed on local planning authorities by the Planning (Listed Buildings and Conservation Areas) Act, 1990, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses (Section 16(2)).
- 8.5.2 Strategic Objective S10 of the Core Strategy is “To conserve and enhance the historic environment by resisting the loss of, or damage to, heritage assets including important buildings”. Core Strategy Policy CP12 states that “in seeking a high standard of design, the Council will expect all development proposals to conserve and enhance natural and heritage assets”.
- 8.5.3 In relation to Listed Buildings DMP Policy DM3 refers to the historic built environment and states:
- ‘The Council will preserve the District’s Listed Buildings and will only support applications where:
- i) The extension/alteration would not adversely affect its character as a building of special architectural or historic interest both internally or externally or its wider setting
 - ii) Any change of use would preserve its character as a building of special architectural or historic interest and ensure its continued use/viability’
- 8.5.4 Applications will only be supported where they sustain, conserve and where appropriate enhance the significance, character and setting of the asset itself and the surrounding historic environment.

- 8.5.5 The application site contains a number of heritage assets including both listed buildings and curtilage listed buildings:
- The Langleybury Mansion House – Grade II* Listed
 Stable Block – Grade II Listed
 Aisled Barn – Grade II Listed
 Cottages (row of three dwellings) – Grade II Listed
 South Lodge – Curtilage Listed
 West Lodge – Curtilage Listed
 Former Gardeners Accommodation – Curtilage Listed
 E shaped Barn – Curtilage Listed
 Former Laundry Building – Curtilage Listed
 The historic garden and features such as the pond and Wall – Curtilage Listed.
- 8.5.6 The site is also adjacent to the Hunton Bridge Conservation Area, and beyond the north of the site, within the Conservation Area, are Grade II* listed Church of St Paul, and Grade II listed Lych Gate, Loyd Memorial Cross and Langleybury War Memorial located in or directly adjacent to the churchyard.
- 8.5.7 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states:
- “In considering whether to grant planning permission or permission in principle for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”
- 8.5.8 Paragraph 201 of the NPPF advises that:
- “Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.”
- 8.5.9 Paragraph 203 of the NPPF advises that:
- ‘In determining applications, local planning authorities should take account of:
- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - c) the desirability of new development making a positive contribution to local character and distinctiveness.’
- 8.5.10 Historic England describes the significance of the Langleybury House and relationship with the other heritage assets stating:
- ‘Langleybury House is a Georgian country house built circa 1725-8 for Sir R Raymond, Lord Chief Justice. It is built from red brick with stone dressings and a slated roof. There is a stone cornice to the 19th Century balustraded parapet with urns.

'The house was heavily altered and extended in the Victorian period firstly remodelled for W.J Loyd circa 1860-70 and extended for E.H Loyd, circa 1890.

'At this time the mansion was re-orientated, a closed porch with pedimented doorcase added and a two storey late 19th century canted link replaced the earlier covered passage to the service wing. The link adds irregularity and intrigue.

'Langleybury is a fine example of a Georgian country house with Victorian alterations consisting of a good-quality composition and a distinctive plan form.

'The house's more than special architectural and historic interest is reflected in its grade II* listing.

'The house is part of a wider estate of important ancillary buildings which are recognised nationally by their grade II designation. This includes the stable block, 'old farm cottages' and aisled barn thought to date from 15/16th Century. Unusually the historic farmyard is located very closely to the mansion house, situated directly to the south west. The house and estate buildings form a remarkable and highly important complex which is set in a historic parkland.

'Like the mansion house itself the grounds are also a result of multiple phases of development. The land to the north and east of the mansion was originally imparked while the southern area was absorbed into a larger area of imparkment in the later 19th Century. Some more recent buildings and landscaping relating to the site's use as a school in the 20th Century have had a detrimental impact to the house and its setting. At this point the landscaping was largely left to grassland, relatively few trees, and several areas of hardstanding. Modern development outside the park has also changed the wider setting. However, the landscape still retains a rolling parkland character within which the house is commanding sited on a plateau overlooking the land to the south.'

8.5.11 The Conservation Officer has also discussed the significance of the heritage assets including the Grade II Listed Building and curtilage listed buildings:

'Langleybury House is a large country house dating to the early eighteenth century and alteration in the mid-late nineteenth century. The house is set within its own grounds, which is bound to the north and west by Langleybury Lane, to the east by Watford Road and to the south by the road connecting the A41 and the M25. The historic parkland also includes the aforementioned curtilage listed buildings, the mid-late twentieth century school and structures associated with the children's farm. The parkland, Grade II listed buildings and curtilage listed buildings are an important part of Langleybury House's setting, they permit an understanding and appreciation of the asset's historic context as a large country house set within a rural landscape served by several associated buildings, as well as the functional use of the farmstead serving Langleybury House and the wider estate. Although the setting of the assets has been compromised by the construction of the twentieth century school, some modern agricultural buildings, and the environmental effects of the M25, the historic parkland remains open, verdant and naturalistic in its character and use. This contributes to the experience and appreciation of the heritage assets in a rural, agrarian landscape, akin to their original setting. The historic parkland therefore makes a positive contribution to the significance of the Grade II* house, Grade II listed buildings and curtilage listed buildings.'

8.5.12 Paragraphs 205 and 206 of the NPPF state that:

"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of

whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”

“Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.”

- 8.5.13 Historic England commented on the application as originally submitted, where they advised that they considered that the new build elements to create the ‘Film Hub’ would result in less than substantial harm of a high level to the setting and significance of the Grade II* Listed Mansion and other listed buildings and as such raised an objection to the proposed development. Since the preliminary committee hearing in March 2023 there have been a number of amendments made to the scheme as set out in paragraph 3.23 of this report. Following these amendments Historic England have advised that the level of harm has reduced from ‘high’ to ‘moderate to high’ less than substantial harm to the setting of the listed buildings and as such have removed their original objection to the proposed development.
- 8.5.14 On the amended scheme Historic England noted that although the elements of the scheme to the south have been reduced in scale and a greater buffer distance has been provided between the two parts of the development, the extent and scale of the support buildings and sound sheds would introduce buildings of a nature that would be incongruous and alien in a historic landscape. Historic England expressed that the backlot remains similar to the original proposal as such the impact and their concerns remain the same, which were: ‘This area extends into the parkland and into key site lines from the mansion house and its historic core. While the intention is for this to be used on a temporary basis large sets that would be set up for considerable periods of time and potentially on a back to back basis would dramatically alter the parkland character and detract from the rural setting of mansion house.’
- 8.5.15 TRDC’s Conservation Officer has also assessed the proposed development and their assessment of the scheme reaffirms Historic England’s evaluation confirming that the level of harm to the significance of the asset resulting from the proposed development would be less than substantial stating:
- ‘The proposed extent, scale and appearance of the development would significantly alter the setting of Langleybury House and other heritage assets. The proposal would have a detrimental impact on attributes that have been identified to positively contribute towards the significance of the assets. The aspects of the scheme that are positive are undermined by the harmful aspects of this scheme. This proposal would replace the existing, unsympathetic structures with a development of a vastly greater scale and extent. The proposed development would also be architecturally incongruous within the rural, pastoral and parkland setting of the heritage assets. The proposal would have an industrialising impact on the settings of the assets and detract from our ability to appreciate their architectural and historic interest. The proposal would be more harmful than the existing situation and would have a cumulative negative impact on the significance of the heritage assets.’
- 8.5.16 The extracts set out in the preceding paragraphs from the comments submitted by Historic England and Conservation Officer summarise the overall identified harm to the heritage assets. The impact on each heritage asset is described in detail within the consultee comments and will not be repeated within the report. Historic England and the Conservation Officer’s full detailed comments can be found at Appendix 1; Historic England paragraph 1.1.5 and Conservation Officer paragraph 1.1.4.
- 8.5.17 The level of less than substantial harm to each heritage asset has been identified by the Conservation Officer and is listed below:

*The Langleybury House – Grade II * Listed – Low to mid level*
Stable Bloc – Grade II Listed – low to mid level
Aisled Barn – Grade II Listed – low to mid level
Cottages (row of three dwellings) – Grade II Listed – low to mid level
South Lodge – Curtilage Listed – low to mid level
West Lodge – Curtilage Listed – low to mid level
Former Gardeners Accommodation – Curtilage Listed – low to mid level
E shaped Barn – Curtilage Listed – low to mid level
Former Laundry Building – Curtilage Listed – low to mid level
The historic garden and features such as the pond and Wall – Curtilage Listed.
Hunton Bridge Conservation Area and nearby Listed Buildings – No identified harm

Public Benefits

8.5.18 Where less than substantial harm to the significance of a heritage asset is identified, in accordance with paragraph 208 of the NPPF this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. Whilst Historic England and the Conservation Officer both identify that the proposal would result in less than substantial harm due to the impact on the setting of the heritage assets Historic England consider the resultant harm to be of a moderate to high level whilst the Conservation Officer considers the harm to be of a low to mid level of less than substantial harm. Whilst both sets of comments are detailed the Conservation Officers comments provide a detailed overview and assessment of the impact on all of the heritage assets. In light of this for the basis of the assessment of less than substantial harm to be weighed against the public benefits this balancing exercise will be based on the proposed development resulting in low to mid level of less than substantial harm on the heritage assets.

8.5.19 The NPPG advises that public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the NPPF. Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private building which secures its future use as a designated heritage asset could be a public benefit. There is no identified method of weighing public benefits.

8.5.20 Heritage benefits are included as part of the assessment of public benefits. The heritage benefits of the scheme are set out in full within the applicant's Historic Building Report (Appendix F of the Environmental Statement). The summary of the heritage benefits set out below are taken from the Planning Statement (paragraph 5.36; page 30). This section identifies the heritage benefits put forward by the applicant and includes comment from the Officer in respect of where these benefits might be affected by the proposed development:

1 Improve and enhance all listed and curtilage listed buildings on the site and remove detracting modern features, including later additions, uPVC windows, modern services, concrete floor finishes, cement-tiled roofs, concrete floors etc, halt any decline of the built fabric, allowing the house to be taken off the 'At Risk' register.

2 Establish a long-term beneficial use for all the historic buildings, including filming in the mansion and barn, a welcome building in the Laundry, a bicycle hub in the L shaped barn workshop building, workshops in the E-shaped barn, and continued residential uses in the other buildings, without needing damaging modern interventions which would result from many other potential uses, and promoting the buildings positively to a very wide audience both nationally and internationally.

Officer comment: The long term use of the heritage assets is noted and establishing a long term use is considered a benefit.

It is however prudent to note that the proposed continued use of the house and barn for filming is not devoid of interventions. Set builds serve to divide the larger rooms of the house, as viewed on site visits; rigging, lighting, flattage and painting of the original features adversely affect the merits of the heritage assets and introduce artificial features within the heritage assets.

A Heritage Partnership Agreement (HPA) has been proposed by the applicant. The HPA will allow the parties to agree a set of parameters of agreeable interventions to the building that would not need submission of separate Listed Building Consent applications every time a production occupies the building and would like to make changes to the building to suit their filming requirements. Whilst this is not part of the assessment of the current application it does identify that the use of the buildings for filming would result in interventions to the buildings.

3 Reinstate lost historic primary views from the house over the formal gardens and parkland through carefully considered removal and pruning of low-quality planting, including invasive woodland species (rhododendron etc.), and through enhanced landscaping of the formal garden and walled garden, including the remnants of the Victorian formal garden, reinstatement of a productive garden in the walled garden, and intensified planting in the wider parkland.

4 Reinstate the lost productive garden in the Walled Garden, reinstate a building on the east facing garden wall in the place of lost garden buildings, accommodating a public café function which will allow visitors to enjoy the formal aspect of the house and create a better appreciation of its heritage value.

Officer comment: As identified by the document titled Langleybury Film Hub – response to Planning Officer it was confirmed that the café will only be for the use of film hub users and will not be open to the general public.

5 Enhance the degraded formal setting of the main, north-facing elevation of the house, including retention of Victorian stone features which survive as fragments, and otherwise employ picturesque landscaping principles as shown on early depictions of the site.

6 Reinstate the ruinous water reservoir west of the barn, repair its brick work and replace modern brick with matching brick.

7 Allow public access to all historic buildings, except residences, when feasible between film productions, enabling a better appreciation of these heritage assets by all.

Officer comment: Although reference to public access is set out in the draft HOT it does not identify that the heritage assets would be open to the public for a specific number of days. As such, currently there is limited information of how many days and how this would be managed to allow officers to make a judgement of whether this is a benefit of any material weight.

8 Remove all detracting post-1948 agricultural buildings and their associated car parking and utilitarian hard landscaping and replace them with sympathetic buildings of high architectural quality.

Officer comment: The agricultural buildings form part of the historic use of the site and although some are modern in appearance they are a feature that respect the historic setting of the listed buildings. Their removal and replacement with large scale industrial units where the scale and use would not reflect the historic agricultural use of the site would dominate the setting and remaining listed and curtilage listed structures.

9 Remove the detracting post-war school and replace it with a building on a smaller footprint and in more sympathetic forms and materials, helping to re-establish the primacy of the

house in views from the canal and footpath and repairing views from the house across the parkland.

Officer comment: The removal of the existing school is a benefit. However, although this falls within the outline part of the application the indicative plans indicate that the school would be replaced with an equally large, modern and incongruous building, of similar vertical emphasis. There would be improvements to the views of the mansion from longer range views through the removal of the school however the propellor stage building would still be positioned in a prominent location to the south of the mansion and within the landscape. Further views of the mansion and from the mansion would be impaired by the parking of large scale HGV trucks associated with filming sited in the parking area which is located in a prominent position within the landscape directly to the east of the mansion.

10 Remove all temporary film-related structures and provide well-considered long term sustainable attractive buildings for filming and associated uses in the right place.

Officer comment: Two large buildings sited close to the agricultural part of the site do not benefit from planning permission and the other associated structures will be required to be removed when the temporary consent ends. This is not a heritage benefit.

11 Remove ad-hoc hard standing and car parking and re-provide hard surfaces in carefully chosen locations in the farm area and to the south, to enhance the setting of the listed buildings on site. There is a lot of hardstanding associated with the temporary use within the school ground and farm area that would be required to be removed to when this temporary use ceases.

Officer comment: The proposed development would still include large areas of hardstanding which would also include and facilitate the parking of large vehicles close to and impair the views into and out of the mansion, including the large area of hardstanding to the east of the mansion. The large extent of hardstanding associated with filming is acknowledged within the Historic Building Report.

12 Enhance the eroded parkland through succession planting and continue to allow limited grazing, creating greater biodiversity similar to that which historically characterised the parkland, and reinstate lost water bodies at the bottom of the parkland, enhancing its appearance and sustainability.

13 Enlarge the area for public access in the parkland through a larger accessible area along the canal and allow a better appreciation of the historic landscape and more views of the historic buildings.

14 Create useable and 'joined up' public footpath access across the site which will link to Cassiobury Park and across the parkland and 111 Rookery Woods to St Paul's Church Langleybury and beyond.

15 Improve visibility and accessibility to and from the canal and River Gade such that historical views of both the house and the Church can be enjoyed from these viewpoints again.

16 Create a more modern Children's Farm that is sustainable in the long term with educational remit, suitable to be used by the nearby school and others, with potential to educate visitors about the history of Langleybury as well as about animal welfare, biodiversity etc. The children's farm has been moved to allow for a café to be built where the existing children's farm is sited.

Officer Comment: This is not a heritage benefit.

- 8.5.21 Historic England noted that the LPA should ‘be convinced that the harm is outweighed by wider public benefits which could not be similarly delivered in a less harmful way as outlined in the NPPF’. It has not been evidenced that the heritage benefits, more specifically benefits 1, 3, 4, 5, 6, 8, 12, 13, 14 and 15, are dependent on the delivery of the development of the scale proposed. Notwithstanding this, it is acknowledged that some heritage benefits would result from the proposed development of which substantial weight is attributed to.

Economic Benefits

- 8.5.22 The proposals would create significant employment (845 direct jobs and 695 indirect jobs during operation of the development not including during the construction phase) and an increase in GVA (£93.3 million) with additional employment and GVA associated with the construction phase of the development. The proposed development would also provide development that would facilitate in meeting the demands of the filming industry within an existing filming hub and providing small scale industrial units where there is a demand for this type and scale of development within the District. Substantial weight is attached to the economic benefits associated with the proposed development.

Social Benefits

- 8.5.23 The social benefits associated with the development include increased public accessibility to open space to the east of the site through provision of additional publicly accessible paths and routes through the eastern part of the site; relocation of the Childrens Farm and provision of a modern facility and creation of a car park to serve the nearby school.
- 8.5.24 The Propellor stages propose the provision of an educational facility that would be leased and occupied by an educational provider such as the University of Hertfordshire that would provide on site real time invaluable experience for students and local people. Provided the building is secured to be used in accordance with this stated intention it would be a public benefit. The development would provide social benefits of which substantial weight could be attributed to.

Environmental Benefits

- 8.5.25 The supporting evidence identifies that the environmental benefits associated with the proposal include, regeneration of brownfield element of the site; implementation of green and blue infrastructure strategy including tree planting; implementation of Building with Nature to deliver high quality green infrastructure; 28% biodiversity net gain.
- 8.5.26 The proposal seeks to implement a green and blue infrastructure strategy which has been granted a Building with Nature Award. The award identifies that the proposed development would incorporate an infrastructure that aims to enhance the natural capital within the wider historic landscape by focusing on increased biodiversity, carbon capture and public accessibility. Public accessibility has already been considered under the Social Benefits. The Green and Blue Infrastructure, provision of additional tree planting and 28% biodiversity net gain are interlinked. The development would have environmental benefits of which hold substantial weight as a public benefit.
- 8.5.27 Paragraph 208 of the NPPF also identifies that, where appropriate, the optimum viable use can used as a tool to assess whether public benefits outweigh the less than substantial harm. In relation to the scale of the development and assessment of public benefits, including optimum viable use Historic England advised that:

‘It is important to consider the optimum viable use for the site and be convinced that the harm is outweighed by wider public benefits which could not be similarly delivered in a less harmful way as outlined in the NPPF (paragraph 202). We understand that an alternative use which could result in less harmful development within the park is quite likely to result in more intensive use of the mansion which could result in harm. However, due to the scale of

development put forward with this use we recommend that your authority should be satisfied the proposed film use is the optimum viable use for the site and that the fourth sound shed is necessary to secure this.'

8.5.28 The documentation identifies that the proposal would provide a long term use but does not specify optimum viable use. The agent has advised that the NPPF only required optimum viable use to be demonstrated where appropriate. The agent considers that as the development would deliver a long term use, not end use, and that there are public benefits associated with the proposal the optimum viable use in this instance is not required to be demonstrated.

8.5.29 The public benefits associated with the development and weight attached to these benefits are noted including that the proposed development would bring about the repair and long-term use of the buildings; the repair of the mansion is welcomed as it is on Historic England's Heritage At Risk register. However, as identified within paragraph 206 of the NPPF when assessing the effects of a development on the particular significance of a heritage asset this includes development that affects the setting of a heritage asset. Historic England and the Conservation Officer require clear and convincing justification for the scale of the development. The document titled 'A Briefing to TRDC on the Need for Langleybury Film Hub & the benefits of the Proposed Facilities' submitted in support of the application does however discuss the scale in terms of number of studios required to support the development stating:

'These are sound-proofed boxes where productions build and shoot sets. There is an under supply of stage space in the market to service future demand, particularly for smaller and independent productions. Typically, these productions will require an average of 2-3 stages each. However, as explained above, each production is unique and so requirements can be hugely varied. It is important we have the optimum mix of units to secure maximum occupancy across the different types of space on site.

'In light of the above, Langleybury Film Hub includes 4 sound stages, all at the smaller end of the spectrum in terms of what is expected by the industry.'

8.5.30 This provides justification of how the proposed development would work. No evidence has however been submitted identifying that the scale/quantum of development of the café, craft zone, studio space, support buildings and backlot, that would result in the less than substantial harm to the significance of the heritage assets through impact on their setting is the minimum necessary to release the heritage benefits identified. It is noted that a reduced scheme would reduce the scale of the identified economic benefits in terms of total GVA and employment but an alternative less harmful scheme could still yield benefits of substantial weight whilst lessening the harmful effects of the development.

8.5.31 Alternative schemes have been suggested for example removal of the southern aspect of the site which includes studio space, backlot and support structures. In response to the suggestion of an alternative scheme of reduced scale the LPA are advised that the development needs to be delivered as proposed to provide a viable scheme; although this is not supported by evidence. No evidence that the same heritage benefits could not be delivered on an alternative scheme have been submitted in support of this. There is evidence that a less harmful alternative scheme can be delivered on the site. The site benefits from adopted Policy SA7 of the Site Allocations DPD which states:

'The Council acknowledges the need for change in these two areas.

'Appropriate uses on the Langleybury site are hotel/leisure development and residential, and the continuation of agricultural uses remains appropriate.'

8.5.32 Policy SA7 is informed by a published document titled Langleybury and The Grove Development Brief, June 2012, which superseded a 1995 brief for Langleybury School site.

The Brief states: This Development Brief will be used as an evidence base document in relation to the TRDC Site Allocations document and will be a material planning consideration when determining any future applications on this site. In the Heritage section of the Brief it states:

'The following development parameters for development at Langleybury have been identified:

1. Alteration to the mansion - internal and external repair and alteration should protect or exploit key features of heritage value (for example the wood panelling and main staircase) and limit alteration to original fabric
2. Alteration to listed buildings (stables, aisled barn and cottages) or structures which add to the heritage value and character of the site overall (e.g. other farm barns) - proposals should consider the heritage contribution of buildings as a group and how this assists in revealing heritage importance of the assets on the site
3. Development in the setting of the mansion - development should seek to be complimentary in scale to the mansion
4. Development which may affect the setting of set pieces related to the original use of the mansion and estate (such as the walled garden) - proposals should consider the condition and purpose of functional elements of the buildings on the estate and how their relationship to the heritage value of the mansion can be maintained and protected
5. Development which may affect the relationship of the heritage assets to the garden, grounds and estate - the relationship of the mansion to its formal garden and wider estate should be a key consideration in the layout of proposed development
6. Materials and quality of construction - high quality materials should be used with construction techniques appropriate to the relative value and sensitivity of the heritage asset affected. Overall a presumption for high quality materials and appearance should be used'

8.5.33 It is noted that Policy SA7 forms part of the adopted site allocations DPD that was adopted in 2014 and the Development Brief was approved in 2012 thus are dated and alternative schemes for the site can be considered. However, what the Development Brief does identify an alternative less harmful use of the site; no evidence has been submitted that this use would not now be a viable prospect especially considering the site included a housing development as part of the proposal. Clear and convincing justification has not been provided for the scale and quantum of development proposed that would result in less than substantial harm to the significance of the heritage assets through harm to their setting contrary to paragraph 206 of the NPPF.

8.5.34 Section 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it processes. The Conservation Officer has advised that the proposed development would result in low to mid levels of less than substantial harm to the Grade II* Listed Building that the grade II* Listed mansion and other listed buildings derives from its setting. Public benefits, including heritage benefits, do exist however taking into consideration the impact that the design, scale and siting of the development would have on the heritage asset through impact on its setting and the considerable importance and weight that should be attached to preserving the setting of the Listed Building it is not considered that the harm is outweighed by the public benefits. The proposed development would therefore be contrary to Policy CP12 of the Core Strategy, Policy DM3 of the DMP LDD and the NPPF (2023).

Impact on Archaeology

- 8.5.35 The proposed development site comprises the former Langleybury Estate and Home Farm. Langleybury House [Historic Environment Record No 11391] is an early 18th century Grade II* Listed country house that was in use as a school between 1947-96. It is set within the remains of its former parkland and formal gardens [HER 12721], which were laid out in the mid 19th century. Associated buildings include the Grade II Listed Stables, to the south-west of the house, the notable late 14th century aisled barn, built by abbot John Moot [HER 4851], which is Listed Grade II, the Home Farm [HER 11393], and the associated 1-3 Old Farm Cottages (also Listed Grade II), which used to house farm workers. Herts Archaeology advised that that the proposed development area is of very substantial size, and that it is in a situation favourable to settlement. It therefore has a high potential to contain significant archaeological remains. The proposed development may have an impact upon undesignated heritage assets, some of which may be of regional significance.
- 8.5.36 Herts Archaeology required trial trenching to be carried out and submission of additional information. The trial trenching has been conducted and additional information submitted. Herts Archaeology have confirmed that the pre-determination archaeological trial trench evaluation of the site in late 2022 was carried out to a high standard, and the report that has been submitted is satisfactory. No archaeological remains of significance were identified. Herts Archaeology are now satisfied that the likelihood of encountering below ground heritage assets of significant archaeological interest is low, and confirm that they would not require any further below ground archaeological investigations. Thus, no objections are raised in relation to archaeological considerations, subject to conditions.

8.6 **Impact on the character and appearance of the street scene, locality and landscape**

- 8.6.1 Paragraph 131 of the NPPF states that:

“The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities...”

- 8.6.2 Paragraph 135 of the NPPF states amongst other things that:

“Planning policies and decisions should ensure that developments:

a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities); and

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”

- 8.6.3 Paragraph 139 of the NPPF states that:

“Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local

design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:

(a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes: and/or

(b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.”

8.6.4 Policy CP1 of the Core Strategy (adopted October 2011) advises amongst other things that:

“All development in Three Rivers will contribute to the sustainability of the District. This means taking into account the need to:

n) Promote buildings and public spaces of a high enduring design quality that respects local distinctiveness, is accessible to all and reduces opportunities for crime and anti-social behaviour”

8.6.5 Whilst this criterion talks about buildings and public spaces it stresses the importance of design quality and 'local distinctiveness.

8.6.6 In accordance with the requirements of Policy CP12 of the Core Strategy (adopted October 2011) development should amongst other things:

“a) Have regard to the local context and conserve or enhance the character, amenities and quality of an area.

b) Conserve and enhance natural and heritage assets.

d) Make efficient use of land whilst respecting the distinctiveness of the surrounding area in terms of density, character, layout and spacing, amenity, scale, height, massing and use of materials.”

8.6.7 In relation to landscape, the NPPF (Paragraph 180) identifies that planning policies and decisions should contribute to and enhance the natural and local environment by:

‘a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;’

8.6.8 Development Plan Policy DM7 requires development proposals to make a positive contribution to the surrounding landscape. It notes that proposals that would unacceptably harm the character of the landscape in terms of siting, scale, design or external appearance will be refused planning permission. The policy also states that the council will support proposals that: contribute to the delivery of Green Infrastructure. In regard to Green Infrastructure Core Strategy Policy CP9 states: ‘The Council will seek a net gain in the quality and quantity of Green Infrastructure, through the protection and enhancement of assets and provision of new green spaces’.

- 8.6.9 In relation to impact on character and landscape. The Langleybury and The Grove Development Brief states that:
- 'The following parameters for development at Langleybury have been identified:
- Development at Langleybury should avoid further encroachment on, or preferably remove detracting elements from views from the east of the site from within and across the Gade Valley
 - Development proposals should seek to restore the site to a more natural appearance in views from the Grand Union Canal to create a softer more natural appearance on the skyline
 - Development within the parkland lawn of the mansion should retain the strong connectivity of views from Langleybury Lane looking south up towards the mansion's north façade
 - Adverse visual impacts of development on Langleybury Lane should be minimised as far as possible. Potential for screening of development, for example by using the existing walled garden, should be explored as part of development proposals.'
- 8.6.10 The detailed aspect of the scheme would be concentrated around Langleybury House where there is existing built form. The existing buildings serving the Childrens Farm would be demolished and the historic wall where required would be made good. The café building would be sited on the opposite side of the historic wall from Langleybury Lane and would not result in a prominent or contrived feature as viewed from public vantage points.
- 8.6.11 The new Childrens Farm and parking area would result in the addition of built form to the north of Langleybury House. The area to the north of the Langleybury House is generally undeveloped and open in nature. However, due to its siting set back from Langleybury Lane, that the site sits at a lower level to the Mansion and enclosure by existing vegetation which screens the development of this part of the site, subject to appropriately designed farm buildings and soft landscaping enhancements, would not result in a prominent or incongruous feature as viewed from public vantage points.
- 8.6.12 The craft zone, commercial zones and Propellor Stage Building would be sited within the existing school and agricultural use areas of the site. These are to be considered under reserved matters; however the outline application is supported by indicative drawings. The proposed development within this location would however materially increase the scale of built form bringing it closer to Langleybury Lane and encroaching further into the open landscape to the south of the existing agricultural unit. The scale of development would appear more prominent within the setting than the existing built form and introduce a more urbanising feature in comparison to the existing agricultural buildings associated with the lawful use of the site. However, a sympathetically designed scheme of modest height, scale and architectural design may not result in significant demonstrable harm to the visual amenities of the street scene.
- 8.6.13 The Propellor Stage Building would be sited where the existing school building and ancillary structures are located. Considering the scale and design of the existing built form in this location it is not considered that the building as indicated in the drawings would result in an incongruous feature as viewed from Langleybury Lane or wider public vantage points along the existing PROW and proposed walking routes to the east of the site and wider long range views. Through the removal of the existing school buildings there would be a reduction in built form and enhanced views of the mansion from wider vantage points. The development within the historic farm area where the Listed barn is sited would be enclosed by existing and proposed built form thus its impact on the locality in terms of impact on visual amenities of the area would be limited.
- 8.6.14 The buildings forming the southern part of the development would sit in an elevated position relative to the land to the east which slopes down towards the Canal and would be located

within the open landscape. The southern part of the site is open and rural in character where the existing landscape characteristics positively contributes to the visual amenities and character of the street scene, character of Langleybury Lane and landscape. As such, the impact of the development on character of the street scene and landscape are intrinsically linked and will be discussed as such. This section will discuss the impact on the character including the Landscape Consultants comments on the proposed development.

8.6.15 The Site is located across two National Character Areas (NCA). The eastern part of the site falls within NCA 111: Northern Thames Basin, whilst the western part of the site is part of NCA 110 Chilterns. The most localised Landscape Character Assessment for this site is the County level Hertfordshire Landscape Character Assessment. Within this assessment, the application site is located within the Lower Gade Valley Landscape Character Area (LCA) with the Upper Gade Valley LCA to the north and Sarratt Plateau LCA to the west. The key characteristics of the Lower Gade Valley LCA include:

- narrow valley floor with wide canal and wetland habitats
- historic parkland landscapes, some in declining condition
- historic houses set on the plateau edge looking over the valley
- arterial routes and M25 to north of area ▪ gently sloping valley sides with minor secondary valleys
- urban development hidden by vegetation or set back from the slopes
- individual woods within parklands
- extensive public access to the south
- important mosaic of wildlife habitats adjacent to urban population

8.6.16 In relation to the existing landscape character of the site the Place Services Landscape Consultant comments dated 9 January 2023, stated:

‘the most distinctive feature of this landscape is the gently sloping valleys, historic parkland landscapes and mosaic of wildlife habitats.’

8.6.17 The proposed development to the south would introduce an urbanising, industrial style development within an open rural context. It would have an urbanising effect and appear out of character and incongruous within the setting as viewed from along Langleybury Lane where the size, scale and character of the development would not be in keeping with the existing setting. This would be exacerbated by the proposed formalisation of the existing rural accesses in keeping with the existing agricultural use of the land. The proposed introduction of industrial style urbanising development and of the scale proposed would therefore result in significant demonstrable harm to the visual amenities street scene of Langleybury Lane.

8.6.18 A Landscape Visual Impact Assessment (LVIA) has been submitted in support of the application which is set out within Chapter D of the Environmental Statement. Both the Landscape Consultants have agreed with the assessment criteria including the visual receptors and findings in terms of totality of landscape harm. The Landscape Consultant considered that the site has sensitive landscape qualities both designed and natural which need to be conserved. Whilst the Landscape Consultant is not opposed to the principle of development within this location, they identified that the development would have an adverse impact both on visual amenity and landscape character stating:

‘On review, we are of the judgement that the adverse visual impacts will primarily be limited to the local area, given the topography of the landscape and the vegetation within the immediate setting of the site.

This does not however mean that the localised impacts are not of significance and should still be of material consideration.

For example, at Year 15, we agree that the magnitude of change will reduce in leaf conditions, however we are of the judgement that the scale of effect on local visual receptors such as Langleybury Lane will still be significant at Year 15, especially when you consider winter views. There is a strong reliance on mitigation measures such as a hedgerow (to mature up to 4m in height) and 10m tree planting along Langleybury Lane. Although these landscape elements do provide some necessary screening, these measures contradict the current open countryside and parkland views that can currently be experienced and will not fully screen the proposed built form.'

- 8.6.19 Since receipt of these comments and referral of the preliminary report to the March 2023 Planning Committee amended plans have been submitted; the amendments are set out in paragraph 3.25 of this report. An environmental colour assessment has also been submitted which identifies colours that buildings could be finished in to help integrate them better within the landscape; the colour assessment does not relate to any temporary sets to be sited on the backlot.
- 8.6.20 The Landscape Consultant requested further details regarding lighting, sections, contours and details regarding backlot parameter plan. In relation to sections and proposed contours of the site the Landscape Consultant advised that the planting and proposed fencing (post and wire fencing), colour assessment of the buildings and re siting of the buildings under the amended scheme would help to mitigate the proposed development within the landscape including long range views of the back lot. The Landscape Consultant confirmed that 'The additional information sets out a range of mitigation measures (planting and colour assessment) to lessen the impact of the development on this site.'
- 8.6.21 The level of visibility and harm resulting from the proposed buildings could be lessened through planting along Langleybury Lane and within the parkland, as identified within the LIVA and wireline assessment. The planting would not however mitigate against resultant addition of an incongruous urbanising form of development that would fail to have regard to or conserve and enhance the open, rural character, amenities and quality of the site and rural street scene of Langleybury Lane. The change to the access to a formal access with asphalt, road markings, gates and signage and the proposed 17m high studios sited close to the access would intensify the use of the site relative to the existing use exacerbating the urbanising form of development proposed in the rural setting. The Landscape Consultant has also identified that the mitigation planting along Langleybury Lane would in itself result in harm to the existing landscape experience through materially changing the existing open rural character of the street scene where the Landscape Consultant states:
- 'There is a strong reliance on mitigation measures such as a hedgerow (to mature up to 4m in height) and 10m tree planting along Langleybury Lane. Although these elements do provide some necessary screening, these measures contradict the current open countryside and parkland views that can currently be experienced and will not fully screen the proposed built form.'
- 8.6.22 The amended scheme does not change the proposal in that it would still introduce an urban development in a rural location with enclosing landscaping. The change to the views along Langleybury Lane, by the proposed mitigation planting, is evident in Appendix 6 of the ES Addendum which includes wire lines (View Point 9) and identified below:



8.6.23 Whilst it has been identified that the planting and colour assessment of the buildings would serve to localise the harmful effects of the built development proposed as viewed from the east of the site, the full extent of harm of the proposed backlot within the wider landscape has not been evidenced within the supporting documentation. Details, such as indicative wirelines and cross sections, of the backlot and worst case scenario of the use of the backlot in the wider landscape have been requested. A parameter plan, pictures of backlot and lighting have been submitted. However no detailed sections or indicative plans have been received identifying how the backlot could potentially be used; this is not considered an unreasonable request considering the existing site contains a backlot. As such the full potential extent of harm of the use of the backlot within the landscape and from visual receptors cannot be determined as part of this submission. Further the Landscape Consultant in their original comments identified that a colour assessment of the proposed buildings would help to mitigate against the impacts of the buildings in the landscape from longer range views. The backlot, which would sit to the east of the proposed buildings adjacent to the brow of the hill, would not be subject to this colour assessment. As experienced at other local sites that include backlots and as experienced from backlot sets constructed on the application site, it is reasonable to assume the rear of any sets would face out to the east thus would consist of wooden panelling and scaffolding. The use of this part of the site as a backlot would also be subject to temporary lighting; the supporting evidence indicates that the lighting would be akin to flood lighting and can include high level lighting supported by cranes. The Lighting Assessment (Appendix 7) discusses production lighting, the anticipated harm to sensitive receptors arising from it and potential 'assumed' mitigation measures. Production lighting has not however been included on any of the light

spill plans, this could be due to the changeable nature of the use of the backlot. The harm resulting from the proposed use of the backlot and its prominent setting next to the brow of the hill and visibility to the east of the site has not been assessed as set out in the LIVA and cannot be determined at this time. In turn it cannot be confirmed that acceptable levels of mitigation planting have been or could be provided to mitigate or limit the harm resulting from the use of the land as a backlot and impact on the wider landscape including land to the east within the application site, A41 and from the open publicly accessible land sited between Old Mill Road and PROW 40.

- 8.6.24 Backlots are dependent on flexibility of use and for them to be a viable product they require to be able to accommodate structures of significant height and scale, including lighting, and not be restricted on hours of use. Conditions that are too restrictive in nature could therefore render this part of the scheme unviable or unusable. Therefore if the principle of the backlot is granted at the outline stage with the parameters shown on the plan, external lighting and heights of up to 20m it would not be reasonable to place undue restrictions at reserved matters if the scale proposed were deemed to be harmful at this later stage. Although requested, details have not been submitted as the use is classed as being temporary. The application would however permit permanent use of the backlot for external set builds which can be in place for unrestricted periods of time and quickly replaced with alternative sets. When considering the totality of harm of the development on the landscape and setting of the site the use of the backlot for use as a permanent feature containing built form of up to 20m in height is material to the assessment of the scheme.
- 8.6.25 As apparent with the existing filming on site and other studios, filming activities includes the presence of large scale support vehicles. It is presumed that the support vehicles would be sited in the large un-demarcated parking areas (indicated as 11-02, 11-04, 11-05, 11-06 in on the Masterplan Overview 2107-IFDO-00-RF-DR-A-1005). Although the vehicles would be moveable and dependent on filming schedules their presence would form part of the future landscape character of the area and exacerbate the urbanising harmful effects contrary to the existing open rural character of the site and setting. The agent has advised that the space around the studios and support buildings would be used for parking.
- 8.6.26 The proposed development would remove the existing detracting elements within the landscape for example removal of the school building. It would however introduce development substantial in scale that spreads new detracting elements within the open landscape further across the Gade Valley. The development would therefore fail to restore the site to a more natural appearance along the skyline. The proposal would be contrary to the Development Brief in this regard.
- 8.6.27 The development to the south of the site, by virtue of its siting, scale, and use, would introduce an urbanising and incongruous industrial form of development to the detriment of the existing open, rural character of Langleybury Lane and wider vantage points. The use, scale, height and massing of the development proposed and mitigation planting would not have regard to or be sympathetic to its local rural context and would not respect the open parkland distinctiveness of the site and open, rural qualities of the surrounding locality. It is considered that the development would not preserve or enhance but would cause significant harm to the character and appearance of the site and the local area. The true extent of harm within the setting has not been fully demonstrated, as such the proposed development would conflict with Policy CP12 of the Core Strategy, Policy DM7 of the DMP LDD and the NPPF.

8.7 Highways Impacts

- 8.7.1 Paragraph 114 of the NPPF advises that;

In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;

b) safe and suitable access to the site can be achieved for all users;

c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and

d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

8.7.2 Paragraph 115 of the NPPF states that ‘Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe’.

8.7.3 All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed (paragraph 117 of the NPPF).

8.7.4 Policy CP1 of the Core Strategy (adopted October 2011) advises that in ensuring all development contributes to the sustainability of the District, it is necessary to take into account the need to reduce the need to travel by locating development in accessible locations and promoting a range of sustainable transport modes.

8.7.5 Policy CP10 (Transport and Travel) of the Core Strategy (adopted October 2011) advises that all development should be designed and located to minimise the impacts of travel by motor vehicle on the District. Development will need to demonstrate that:

i) It provides a safe and adequate means of access

j) It is appropriate in scale to the existing infrastructure...

k) It is integrated with the wider network of transport routes...

l) It makes adequate provision for all users...

m) It includes where appropriate, provision for public transport either within the scheme or through contributions

n) The impact of the proposal on transport has been fully assessed...

o) The proposal is accompanied by a draft Green Travel Plan

8.7.6 The film hub would be served by the existing three accesses; all of the accesses would be increased in width and served by improved visibility splays. The farm and parking will be served by the existing access serving the primary school.

8.7.7 The application is supported by a Transport Assessment and Addendums and Travel Plan (Appendix G1) as set out within the Environmental Statement. Following the submission of additional information by the applicant no objections are raised by Hertfordshire County Council as Local Highway Authority in relation to the impact of the development on highway safety along Langleybury Lane or impact on the wider highway networks.

8.7.8 In direct response to improving sustainability connections to the site and to facilitate pedestrian access via the A41 which is identified as currently providing a barrier to the site for direct pedestrian/cycle access from the residential area of Abbots Langley, a Toucan Crossing is proposed along the A41. This would improve connectivity between the site and Hunton Bridge and to public transport networks on the east side of the A41.

8.7.9 In relation to person trip numbers the Transport Assessment mode split is based on 87.5% usage of the private car. The travel plan seeks to reduce this to 70%. No objections to the

level of car usage has been raised by the Highway Authority. The Highways Authority has assessed the development subject to impact on the junctions with the M25 and along the A41 most of the junctions have been identified as being at or over absolute capacity during peak times. Hertfordshire Highways have confirmed that whilst not ideal HCC do not consider that the impacts on capacity as a result of the development cannot be mitigated through the travel plan process and improving the site's accessibility. It has been identified that in the AM peak hour the addition of the development traffic would have a significant impact. The inside lane of the southbound A41 rises to almost absolute capacity. HCC consider that it is appropriate to mitigate this impact through the travel plan process and contributions to schemes encouraging a wider modal shift.

8.7.10 The application site sits outside of a settlement boundary. No objections have been raised by the Highway Authority in relation to the sustainability of the site. In accordance with NPPF paragraph 114 a) appropriate opportunities to promote sustainable transport modes including providing on site EV charging points will be encouraged as set out within the travel plan and the required delivery of a toucan crossing that would improve the accessibility of the site with the bus stops sited along the A41 and providing access to Watford Junction. The Travel Plan proposes the following sustainability measures:

- Improving/encourage walking and cycling; through improvements to PROW and cycle routes within the site, provide cycle parking, offer cycle to work scheme;
- Publicise Public Transport;
- Provision of an Electric Minibus that will provide a regular service between the site and Watford Junction;
- Encourage car sharing;
- Car Club;
- Provision of on site facilities (such as on site café);
- Offer personalised travel planning.

8.7.11 The three existing accesses will be upgraded into formalised accesses that can support two way traffic and HGVs. No objections are raised in relation to highway safety for the upgrade and use of these accesses.

8.7.12 To improve sustainability objectives £358,661 contribution towards local bus services and £502,699 contribution towards cycleway improvements has been agreed to be paid; this would be required to be secured within a S106 agreement.

8.7.13 National Highways have removed their original objection to the proposed development following the submission of further information. They have confirmed that the proposed development would not adversely affect the strategic road network.

8.7.14 On the basis of the above no objections are raised in respect of highways impacts.

8.8 **Vehicle Parking**

8.8.1 Three Rivers District Council are the Parking Authority, and Policy DM13 and Appendix 5 of the Development Management Policies LDD set out the car parking requirements for the District.

8.8.2 There are no parking standards relating specifically to film studio use. The Policy advises that for uses not specifically identified, standards should be considered on a case by case basis. The most closely related standards are considered to be:

- Office and Research Development 1 space per 30sqm
- Light Industry 1 space per 50sqm
- General Industry 1 space per 75sqm

- 8.8.3 Appendix 5 does indicate that the car parking standards may be adjusted according to which zone the proposed development is located in. The site is within Zone 4, equating to 75-100% of the demand based standard.
- 8.8.4 As the application is in outline for the majority of the new build and the plans are indicative only with scale and layout reserved and could be subject to change the level of parking for the wider site cannot be fully determined at this time.
- 8.8.5 The area for full planning permission (ie northern part of the site) would provide in excess of 100 parking spaces. With the exception of the café, which would serve the Film Hub, the detailed element of the scheme proposes limited increase in built form. The application is supported by a Travel Plan (Appendix G3 of the Environmental Statement) which sets out measures and initiatives to encourage use of sustainable modes of transport. This identifies that the measures proposed would seek to reduce the level of people using private modes of transport to access the site to 70%. Based on the parking levels set out within the supporting Parking Note sufficient parking would be provided to serve the development proposed under the full part of the application.
- 8.8.6 The Transport Assessment Addendum (Appendix G of the ES) sets out the parking projections and identifies that a total of 667 parking spaces would be required across the site (both full and hybrid). As experienced at the application site and alternative sites used for filming, due to the nature of employment there are significant parking pressures associated with filming. These parking pressures at alternative filming sites have required off site parking and subsequent applications for multi storey car parks. It is noted that it is not anticipated that all sets, support space, backlot, house, barn and propellor stages are proposed to be occupied at the same time. However, this could be the case thus placing significant parking pressures within the site. Further, the Parking Note identifies that the Propellor Stages would only generate a parking requirement for 9 parking spaces per day. The Social Briefing Note, dated 14 June 2024, however identifies that the Propellor Stage concept will facilitate 882 paid placements per annum, based on an average 6 week duration. This indicates an intensive use of the Propellor Stage building and raises concerns that this would generate a parking requirement in excess of 9 spaces. For example, the Transport Note submitted in relation to the use of the Propellor Stages is based on up to circa 600 personnel attending the education facility and identifies that this scale of use would generate 32 and 19 two way AM and PM vehicle trips thus identifying that the Propellor Stages are likely to generate a parking requirement in excess of 9 spaces. The Travel Plan does not indicate that students will only be allowed to access the site by sustainable transport methods. There are also no dedicated parking spaces for support vehicles.
- 8.8.7 Considering the lack of sustainable transport options directly serving the site it is anticipated that the use of private vehicles accessing the site will be high, as identified in the Travel Plan with an overall potential 30% reduction in car use. Thus, although sufficient parking would be provided in accordance with the parking evidence submitted with the application concerns are raised that the proposed intensity could require additional parking to serve the use. Although this is a concern a reason for refusal would not be justified on lack of parking provision.
- 8.8.8 A condition will be attached to any planning permission requiring the parking to be provided before first use of the site associated with this permission. It is noted that the Transport Assessment Addendum identifies that the development would include a creche; however a creche is not proposed as part of the scheme.

8.8.9 The Childrens Farm would share the proposed parking area with the school and it is not considered that there would be conflict between users of the Childrens Farm and school parents at pick up and drop off. The parking arrangements here could be controlled by planning condition, which would also restrict the use of this car park to ensure users of the film hub do not occupy spaces and therefore diminish the beneficial impact of this new car park. Thus, sufficient parking would be provided to the north of the site.

8.9 Impact on amenity of neighbouring occupiers

8.9.1 Paragraph 135 of the NPPF advises that planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

8.9.2 Policy CP6 of the Core Strategy (adopted October 2011) advises that the Council will support development that sustains parts of the District as attractive areas for business.

8.9.3 Policy CP12 of the Core Strategy (adopted October 2011) states that the Council will expect development proposals to protect residential amenities.

8.9.4 There are residential properties sited within and adjacent to the application site. Little Liz, the neighbouring Traveller site, is sited on the opposite side of Langleybury Lane to where the Sound Stages and Support Space will be located. The revised development has resulted in a reduction in the size of the development thus the proposed built form would be sited further from Little Liz. Considering the separation between the developments it is not considered that the proposed development would result in any loss of light or harm to the visual amenities of the neighbouring development.

8.9.5 The access serving the residential properties of Langleybury Fields and Berry Bushes Farm is sited opposite an access serving the Film Hub. These residential properties are however sited over 500m from the application site. St Pauls Vicarage is located on the opposite side of Langleybury Lane to the proposed parking area to serve the Primary School and Farm. Considering the relatively isolated location of the site from the surrounding residential properties the proposal would not result in any loss of light or harm to the residential amenities of the closest neighbouring properties. The Highways Authority have not raised any concerns regarding the siting of the access and conflict with the access serving the residential properties serving Langleybury Fields and Berry Bushes Farm.

8.9.6 The site is also elevated above the A41 and is clearly visible from the opposite side of the Gade Valley. The proposed development would change the landscape on the opposite side of the Valley from open countryside to an industrial style development which could be visible from the properties sited on the opposite side for example along Gypsy Lane. Although the development might be visible it would not impact on their residential amenities in terms of loss of light or harm to their visual amenities through creation of an overbearing development.

8.10 Pollution – Air Quality

8.10.1 Paragraph 180 of the NPPF advises that planning policies and decisions should contribute to and enhance the natural and local environment by amongst other considerations:

(e) Preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans;

8.10.2 The NPPG provides guidance as to when air quality would be relevant to a planning decision. In summary, it states that when deciding whether air quality is relevant to a planning application, considerations could include whether the development would, amongst other considerations:

- *Significantly affect traffic in the immediate vicinity of the proposed development site or further afield.*
- *Introduce new point sources of air pollution eg. furnaces.*
- *Give rise to potentially unacceptable impact (such as dust) during construction for nearby sensitive locations.*

8.10.3 In relation to air quality, Policy DM9 of the Development Management Policies LDD (adopted July 2013) advises that development will not be permitted where it would:

- Have an adverse impact on air pollution levels, particularly where it would adversely affect air quality in an Air Quality Management Area and/or*
- Be subject to unacceptable levels of air pollutants or disturbance from existing pollutant sources.*

8.10.4 The Environmental Statement includes an Air Quality 'Chapter I - Air Quality'. An Air Quality Assessment has been undertaken to assess the impacts of the construction and operational phases of the proposed development. The assessment of construction phase impacts concludes that the implementation of embedded mitigation measures during the construction phase, will substantially reduce the potential for dust and particulate matter to be generated and any residual impact on sensitive receptors is considered to not be significant.

8.10.5 The assessment of operational phase impacts concludes that there will be no exceedances of the relevant air quality objectives or target levels and negligible impacts. The residual effect of the proposed development on sensitive receptors is considered to not be significant.

8.10.6 The Environmental Health Officer has reviewed the submitted information and raised no objections to the proposed development subject to conditions.

8.11 **Pollution – Noise and Vibration**

8.11.1 Paragraph 180 of the NPPF advises that planning policies and decisions should contribute to and enhance the natural and local environment by amongst other considerations:

(e) Preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans;

8.11.2 Policy DM9 of the Development Management Policies LDD (adopted July 2019) sets out that planning permission will not be granted for development that has an unacceptable adverse impact on the indoor and outdoor acoustic environment of existing or planned development, has an unacceptable adverse impact on countryside areas of tranquillity which are important for wildlife and countryside recreation. As identified in the impact on residential amenities section there is residential development sited close to the proposed development the closest being Little Liz. It is important that the noise associated with the proposed development does not result in unacceptable noise and disturbance to the surrounding neighbouring properties.

8.11.3 The Environmental Statement includes a chapter on Noise and Vibration 'Chapter H -Noise and Vibration'.

- 8.11.4 The Council's Environmental Health Officer has reviewed the submitted information and has raised no objections to the operational phase of the development. The Environmental Health Officer has however noted that the site would use special effects and the noise generated from the use of special effects has not been assessed. It has been indicated that a noise assessment should be undertaken and submitted to and agreed by the Local Authority in relation to the potential impact.
- 8.11.5 The Environmental Health Officer has also suggested that as the noise from the use special effects are likely to have an adverse impact on residents, special effects proposals and mitigation needs to be submitted to the local authority within 10 days for approval. Surrounding neighbours must be provided with advanced warning of the intended use of special effects. Where night shoots are proposed to take place on the back lot, communication with all surrounding residents should be undertaken in advance, as soon as the schedule of filming is known.
- 8.11.6 Overall, providing the appropriate mitigation is put into place during the construction and operational phases, which can be secured by condition, the Environmental Health Officer has advised that they have no objections to the proposed development.
- 8.12 **Pollution – Light**
- 8.12.1 Paragraph 180 of the NPPF advises that planning policies and decisions should contribute to and enhance the natural and local environment by amongst other considerations:
- (e) Preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans;*
- 8.12.2 Policy DM9 of the Development Management Policies LDD (adopted July 2013) states in relation to lighting proposals, that development proposals which include external lighting should ensure that:
- i. Proposed lighting schemes are the minimum required for public safety and security*
 - ii. There is no unacceptable adverse impact on neighbouring or nearby properties*
 - iii. There is no unacceptable adverse impact on the surrounding countryside*
 - iv. There is no dazzling or distraction to road users including cyclists, equestrians and pedestrians*
 - v. Road and footway lighting meets the County Council's adopted standards*
 - vi. There is no unacceptably adverse impact on wildlife*
 - vii. Proposals in the vicinity of habitats and habitat features important for wildlife ensure that the lighting is sensitively designed to prevent negative impacts on use of these habitat features.*
- 8.12.3 The application is supported by a Lighting Assessment which reviews the lighting impact of the proposed development and concludes that the lighting methods suggested would reduce light spill over the site boundary into neighbouring areas, and minimise sky glow. The impact of lighting is also considered within the Ecology chapter (Chapter E) of the Environmental Statement; this relates to ecological implications of lighting.
- 8.12.4 Plan SK_04 SHEET_02 identifies the proposed light spill to the south of the site where the development would sit closest to potentially affected residential site – Little Liz. The plan indicates that, although any lighting would be visible from neighbouring sites the light spill would be contained within the site boundaries thus would not affect the residential amenities of the neighbouring residential property. The lighting of the parking area to the north would also have contained lighting that would not affect the residential amenities of any of the

surrounding neighbouring properties. The proposed planting would also help to mitigate light spill over time.

8.12.5 It is noted that the proposed lighting of the site, especially the external lighting to be sited along the eastern aspect of the proposed buildings, would be visible from across the valley. Although visible it would not affect residential amenities of neighbouring properties. It is not considered that the proposed lighting would result in unacceptable impact on the residential amenities of surrounding neighbouring properties. Lighting of the site especially to the south of the site would however introduce an urbanising feature in the countryside discussed in the Green Belt section of this report.

8.12.6 The impact of the development on residential amenities is confirmed by the Council's Environmental Health Officer who has reviewed the submitted documentation regarding lighting and advised that the lighting management plan for the construction phase is satisfactory and providing the mitigation measures outlined are implemented, it is not considered that there would be a significant impact to residents.

8.12.7 Herts Ecology have also reviewed the submitted documentation, whilst they have not objected to the development on impacts of lighting from an ecological perspective they have made the following comments regarding the associated with the proposed development:

'Use of lighting for film production areas on the skyline adjacent to Langleybury Lane could generate substantial light pollution on occasion, although such impacts from film production are not permanent and limited in extent. As such, the Lighting Assessment does evaluate the effects of production lighting as well as permanent lighting. The impacts from both must be considered. I note the intention to monitor lighting, but of what, to whom and why? Against what is this to be measured, to whom is it accountable and what are the consequences if levels are exceeded? More detail is needed for this to be meaningful. Indeed, By designing General Lighting to have an upward light ratio of less than the most stringent criterion of 2.5 %, it can be ensured that there is headroom to accommodate additional upward light associated with Production Lighting. (Lighting Assessment 8.5) This would seem to allow obtrusive lighting to be accepted whilst apparently staying within acceptable overall limits. However, if this activity generates light pollution, the overall success of limiting intrusive lighting will be reduced.'

8.12.8 No objections have been raised in relation to impact on the proposed fixed lighting associated with the proposed development. As identified within Section 8.6 of this report concerns are raised in relation to the lighting of the backlot and more information is required to understand the extent of potential harm resulting from this part of the development that would be changeable in nature both in scale and lighting requirements.

8.13 **Pollution – Land Contamination**

8.13.1 Policy DM9 states that the Council will only grant planning permission for development on, or near to, former landfill sites or on land which is suspected to be contaminated where the Council is satisfied that there will be no threat to the health of future users or occupiers of the site or neighbouring land, and there will be no adverse impact on the quality of local ground water or surface water quality.

8.13.2 Chapter M of the Environmental Statement discusses Ground Conditions, Contamination and Geotechnical. The preliminary risk assessment has identified a number of plausible contaminant linkages that require further investigation. The Environmental Consultant has recommended that a targeted ground investigation be undertaken.

8.13.3 The Environmental Health Officer has commented that a condition would be required to secure further investigatory works to be undertaken, and a remediation strategy and verification plan.

8.13.4 The site is located within Ground Source Protection Zones 1 and 2. The Environment Agency have not raised any objections to the proposed development subject to conditions. The Canal and River Trust have raised concerns regarding contamination of the canal and biodiversity networks and have identified that these matters can be addressed by condition.

8.14 **Impact on Wildlife, Biodiversity and Agricultural Land**

8.14.1 Section 40 of the Natural Environment and Rural Communities Act 2006 requires Local Planning Authorities to have regard to the purpose of conserving biodiversity. This is further emphasised by regulation 3(4) of the Habitat Regulations 1994 which state that Councils must have regard to the strict protection for certain species required by the EC Habitats Directive.

8.14.2 The protection of biodiversity and protected species is a material planning consideration in the assessment of applications in accordance with Policy CP9 of the Core Strategy (adopted October 2011) and Policy DM6 of the DMLDD. National Planning Policy requires Local Authorities to ensure that a protected species survey is undertaken for applications that may be affected prior to determination of a planning application.

8.14.3 Paragraph 186 of the NPPF states:

‘When determining planning applications, local planning authorities should apply the following principles:

a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons 63 reasons 67 and a suitable compensation strategy exists; and

‘d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate’.

8.14.4 Chapter E ‘Ecology and Nature Conservation’ of the submitted Environmental Statement is an Ecology report, with that chapter assessing the likely significant ecological effects of the construction and operational phases of the proposal. It is informed by a Preliminary Ecology Appraisal, Phase 1 Habitat Survey, Bat Survey, Bat Report Invertebrate Scoping report, Reptile survey report and bird survey report, Scientific Technical Report.

8.14.5 The application is further supported by a Green and Blue Infrastructure Plan and Outline Nature Recovery Plan. The submissions place significant emphasis on the provision of protecting and improving biodiversity. The proposal has obtained a Building with Nature Award. This is not a policy requirement, it does however indicate the applicant’s commitment to delivering environmental enhancements and protection to the site.

8.14.6 The submitted documentation has been reviewed by Herts Ecology (full comments can be reviewed in Appendix 1 Section 1.1.21). Herts Ecology have confirmed that the submitted Bat surveys (roost characterisation, presence/absence surveys) (dated September 2023) are thorough and reliable and are able to fully inform the proposals. It is acknowledged that a licence will be required for works to proceed but sufficient information has been provided that it is considered likely a licence would be issued. Herts Ecology have however requested that a condition requiring details of bat mitigation be attached to any planning permission.

8.14.7 Herts Ecology have confirmed that a Biodiversity Net Gain proposed on site in excess of 10% could be delivered. The application was submitted prior to the date for mandatory

BNG requirements as such mandatory 10% BNG would not be applicable to the proposal. A Biodiversity Gain Plan would be required to be submitted as a condition attached to any planning consent. The development would retain all veteran trees in accordance with Policy 186 of the NPPF.

- 8.14.8 The development proposes to increase public access into The Rookery. Herts Ecology have commented on this access provision and questioned how the disturbance associated with the increased access into the woodland would be controlled to prevent any additional ecological impacts of this area.
- 8.14.9 The submitted documentation identifies that there was no evidence of recent badger activity other than possible snuffle holes within the Rookery Spinney, but a disused sett was recorded. Herts Ecology advise that a walkover survey to confirm the position prior to works taking place should be carried out and guidance should be included within a Construction Environmental Management Plan that would be required under condition of any consent.
- 8.14.10 Herts Ecology do not object to the proposed development but do have some concerns regarding lighting however subject to conditions no objections are raised on ecology grounds. Their comments are summarised as:
- ‘On the basis of the above, I do not consider there is sufficient ecological interest present to represent a significant constraint on the proposals. Despite the loss of open parkland, a minimum of 10% BNG has demonstrated for the site and significantly exceeded. This is principally due to proposed improvements to the ecological quality of the remaining grasslands, which are considered to be achievable. Given the impact on the site generally, if approved I consider further details regarding landscaping to reduce lighting and visual impacts will be necessary, consistent with the site’s important parkland history, as will a detailed lighting scheme and a Biodiversity Gain Plan as conditions of approval’.
- 8.14.11 The NPPF identifies Best and most versatile agricultural land as land in grades 1, 2 and 3a of the Agricultural Land Classification. The NPPF encourages the retention agricultural land stating (paragraph 180): Planning policies and decisions should contribute to and enhance the natural and local environment by: b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland. Footnote 62 of the NPPF states that: ‘Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development’.
- 8.14.12 In respect of the potential impact of the proposal on Agricultural Land, the applicant has submitted an Agricultural Land Assessment. This demonstrates that the majority of the application site comprises Grade 3 Agricultural Land (good to moderate quality). The built form of the development will primarily be situated on non-agricultural land and Subgrade 3b land. Approximately 7.69ha of best and most versatile agricultural land and 11.89hectares of Subgrade 3b agricultural land will be permanently removed from agricultural use as a result of the development. A further 30.68 hectares of best and most versatile agricultural land will change use as part of the proposal. It is confirmed within the Planning Statement that 25 hectares of agricultural land will be retained for public access, landscape enhancement and restoration. Natural England have been consulted in relation to the proposed development however no objections have been raised in relation to loss of agricultural land which has historically been used for grazing. The development also seeks to result in improvements to the land through improved biodiversity and building with nature to the east of the site which will help to mitigate against the loss of the agricultural land.
- 8.14.13 Overall the proposed development would lead to ecological enhancements through increased Biodiversity Net Gain on the site. This is in accordance with the requirements of

the NPPF (para 186 (d)). The proposed development would therefore be in accordance with Policies CP1 and CP12 of the Core Strategy, Policy DM6 of the DMP LDD and NPPF.

8.15 **Impact on trees**

8.15.1 As previously noted, this application is submitted in outline with landscaping a reserved matter. Nevertheless, the application has been submitted with illustrative landscaping details, and layout is a matter for consideration, which requires consideration to be given to the impact on existing trees and hedgerows.

8.15.2 Paragraph 180 of the NPPF advises that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes.

8.15.3 In ensuring that all development contributes to the sustainability of the District, Policy CP12 of the Core Strategy (adopted October 2011) advises that development proposals should:

i) Ensure that development is adequately landscaped and is designed to retain, enhance or improve important existing natural features; landscaping should reflect the surrounding landscape of the area and where appropriate integrate with adjoining networks of green open spaces.

8.15.4 Policy DM6 (Biodiversity, Trees, Woodlands, Watercourses and Landscaping) of the Development Management Policies LDD (adopted July 2013) advises that development proposals for new development should be submitted with landscaping proposals which seek to retain trees and other landscape and nature conservation features. Landscaping proposals should also include new trees to enhance the landscape of the site and its surroundings as appropriate.

8.15.5 All 160 high quality (Grade A) trees will be retained. It is indicated in the Planning Statement that a small percentage of moderate quality and below grade tree are proposed for removal. Replacement planting (circa 680 trees) is however proposed although this will form part of the reserved matters for the Outline aspect of the scheme. In relation to impact on trees the Three Rivers Tree and Landscape Officer has stated:

‘The submitted plans indicate that the proposals would have a substantial impact on trees, with 22% of B grade (moderate quality) trees, and 47% of C grade (poor quality) tree being removed to facilitate the development. However, no trees protected by Tree Preservation Order, and no veteran trees are proposed for removal. The plans indicate that extensive new and replacement tree planting would be undertaken following development.

‘If the application is approved, a condition requiring the tree protection method statement to be following before and during construction should be applied. Further details of remedial landscaping, and tree planting should also be required.’

8.15.6 The proposal would also seek to retain all veteran trees on site as required by the NPPF (paragraph 186 (c)). In light of this no objections are raised to the proposed development in relation to impact on trees in accordance with Policy CP12 of the Core Strategy and Policy DM6 of the DMP LDD.

8.16 **Energy Use**

8.16.1 Paragraph 157 of the NPPF states that “The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure”.

- 8.16.2 Policy CP1 of the Core Strategy requires the submission of an Energy and Sustainability Statement demonstrating the extent to which sustainability principles have been incorporated into the location, design, construction and future use of proposals and the expected carbon emissions.
- 8.16.3 Policy DM4 of the DMLDD requires applicants to demonstrate that development will produce 5% less carbon dioxide emissions than Building Regulations Part L (2013) requirements having regard to feasibility and viability. This may be achieved through a combination of energy efficiency measures, incorporation of on-site low carbon and renewable technologies, connection to a local, decentralised, renewable or low carbon energy supply.
- 8.16.4 Three Rivers District Council declared a 'Climate Emergency' in 2019. The Climate Change Motion put forward by Members commits the council to use all practical means to reduce the impact of council services on the environment, use all planning regulations and the Local Plan to cut carbon emissions and reduce the impact on the environment. Following the declaration of the 'Climate Emergency' Three Rivers District Council agreed a Climate Change and Sustainability Report at its Full Council meeting on 25 February 2021. The TRDC Climate Strategy is not a planning document, but an overarching Council Strategy which is informed by the draft policies in the new Local Plan. Whilst the declaration of the Climate Emergency and Climate Change Strategy are noted, it is the current adopted Policy DM4 against which any planning applications must be currently be assessed.
- 8.16.5 The application is accompanied by Energy and Sustainability Statements. This sets out how the proposed development has been designed around a fabric first approach using building orientation, fabric enhancements and elements of thermal mass to deliver a series of low carbon buildings that will run on high efficiency of air and ground source heat pumps. It is estimated that the proposal will deliver 86% reduction in carbon emissions against current building regulations. The development is planned to be fossil fuel free with initially 20% of car parking spaces to include electric charging points; this will be supported by 100% coverage of planned car parking to be provided with the below ground infrastructure and sitewide power capacity to enable full sitewide vehicle electrification. Although the development is hybrid the reduction in carbon emissions is site wide commitment. As such, any planning permission would require the submission of a detailed of a comprehensive scheme demonstrating how the development would achieve the reduction in emissions as proposed to ensure the development would comply with Policy DM4.
- 8.17 **Flood Risk and Drainage**
- 8.17.1 The site is located within Flood Zone 1 and therefore has a 'low probability' of fluvial flooding, with less than a 1 in 1000 annual probability of river or sea flooding in any year. However, as the site area is over 1 hectare a Flood Risk Assessment is required.
- 8.17.2 Paragraph 165 of the NPPF states that;
- Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.*
- 8.17.3 Paragraph 180 of the NPPF advises that the planning system should contribute to and enhance the natural and local environment by remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.
- 8.17.4 Policy CP1 of the Core Strategy (adopted October 2011) recognises that taking into account the need to (b) avoid development in areas at risk of flooding will contribute towards the sustainability of the District.

- 8.17.5 Policy CP12 of the Core Strategy (adopted October 2011) also acknowledges that the Council will expect development proposals to build resilience into a site's design taking into account climate change, for example through flood resistant design.
- 8.17.6 Policy DM8 (Flood Risk and Water Resources) of the Development Management Policies LDD (adopted July 2013) advises that development will only be permitted where it would not be subject to unacceptable risk of flooding and would not unacceptably exacerbate the risks of flooding elsewhere and that the Council will support development where the quantity and quality of surface and groundwater are protected and where there is adequate and sustainable means of water supply. Policy DM8 also requires development to include Sustainable Drainage Systems (SuDs). A SuDS scheme for the management of surface water has been a requirement for all major developments since April 2015.
- 8.17.7 The application is accompanied by an Outline Flood Risk Assessment including Surface Water Drainage Statement and Section K 'Water Environment' discusses drainage and flood risk.
- 8.17.8 The Environment Agency have raised no objections to the proposed development and impact on the flood plain that is sited at the lower level part of the site.
- 8.17.9 In relation to sustainable drainage within the site further information has been submitted which has been reviewed by the Sustainable Drainage Consultant. The Consultants have confirmed that the sustainable drainage methods proposed to be implemented as part of the scheme area acceptable. The SUDs proposed will be secured by condition if permission is granted.
- 8.17.10 It should however be noted that part of the Drainage Scheme proposes the creation of water meadows on the lower fields. To allow continuous access for users of the existing footpath and to help retention of the water within the meadows it is anticipated that the existing PROW passing through this field will be required to be raised above existing ground levels but not by a height that would affect the open rural setting of the field.
- 8.18 Refuse and Recycling**
- 8.18.1 Policy DM10 (Waste Management) of the DMLDD advises that the Council will ensure that there is adequate provision for the storage and recycling of waste and that these facilities are fully integrated into design proposals. New developments will only be supported where:
- i) The siting or design of waste/recycling areas would not result in any adverse impact to residential or work place amenity
 - ii) Waste/recycling areas can be easily accessed (and moved) by occupiers and by local authority/private waste providers
 - iii) There would be no obstruction of pedestrian, cyclists or driver site lines
- 8.18.2 The County Council's adopted waste planning documents reflect Government policy which seeks to ensure that all planning authorities taken responsibility for waste management. This includes ensuring that development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities with the rest of the development and ensuring that the handling of waste arising from the construction and operation of development maximises reuse/recovery opportunities, and minimises off-site disposal.
- 8.18.3 Herts and Minerals Waste Team have confirmed that a Waste Strategy and Site Waste Management Plan (SWMP) has been submitted in support of the application. HCC have confirmed that the submitted SWMP provides sufficient and necessary details they would expect to see included; providing a high level of information relating to the estimated amount of demolition waste to arise. HCC have confirmed that details of Waste carriers and Waste

management facilities for where waste is proposed to be sent should also be provided and the SWMP should be updated periodically. This will be secured by condition.

- 8.18.4 In relation to minerals, the site falls entirely within the 'Sand and Gravel Belt' as identified in HCC's Minerals Local Plan 2002 – 2016. The Sand and Gravel Belt', is a geological area that spans across the southern part of the county and contains the most concentrated deposits of sand and gravel throughout Hertfordshire. In addition the site falls partly within the sand and gravel Mineral Safeguarding Area within HCC's Proposed Submission Minerals Local Plan, January 2019.
- 8.18.5 Adopted Minerals Local Plan Policy 5 (Minerals Policy 5: Mineral Sterilisation) encourages the opportunistic extraction of minerals for use on site prior to non-mineral development. Opportunistic extraction refers to cases where preparation of the site for built development may result in the extraction of suitable material that could be processed and used on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. Policy 8: Mineral Safeguarding, of the Proposed Submission document relates to the full consideration of using raised sand and gravel material on site in construction projects to reduce the need to import material as opportunistic use.
- 8.18.6 The county council, as the Minerals Planning Authority, encourage the opportunistic use of these deposits within the developments, should they be found when creating the foundations/footings. Opportunistic use of minerals will reduce the need to transport sand and gravel to the site and make sustainable use of these valuable resources. Following the submission of the Minerals Resource Assessment (MRA) Herts and Minerals have confirmed that they have no objections to the proposed development subject to conditions.

8.19 **Infrastructure Contributions**

- 8.19.1 Following receipt of Herts Highways comments the following has been identified as being required to be paid:
- £502,699 towards cycle way improvements
 - £358,661 towards local bus service improvements

8.20 **Referral to Secretary of State**

- 8.20.1 The Town and Country Planning (Consultation) (England) Direction 2024 requires Local Planning Authorities to consult the Secretary of State before granting planning permission for certain types of development. These include inappropriate developments in the Green Belt that by reason of their scale or nature or location would have a significant impact on the openness of the Green Belt.

8.21 **Very Special Circumstances and Planning Balance**

- 8.21.1 In accordance with Section 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Considerable importance and weight should therefore be given to the desirability of preserving the setting of listed buildings in the balancing exercise of whether public benefits would outweigh the identified low to mid less than substantial harm (as discussed in full within Section 8.5 of the report). It was considered that public benefits did not outweigh the identified harm to the heritage assets. The proposal would also result in harm to the Green Belt and as such an assessment of whether there are other considerations that would outweigh this harm and any other harm is required to be carried out.

- 8.21.2 This section brings together the assessment that has so far been set out in order to weigh in the balance relevant planning considerations in order to reach a recommendation on the application.
- 8.21.3 Statutory duties
- 8.21.4 Section 143 of the Localism Act amends Section 70 of the Town and Country Planning Act relating to the determination of planning applications and states that in dealing with planning applications, the authority shall have regard to:
- the provisions of the development plan insofar as they are material to the application,
 - any 'local finance considerations,' so far as they are material to the application (such as the likelihood of CIL receipts if applicable), and,
 - any other material considerations
- 8.21.5 In determining the planning application, section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that the application be determined in accordance with the development plan unless material considerations indicate otherwise.
- 8.21.6 The Planning (Listed Building and Conservation Areas) Act 1990 considerations are as follows:
- Section 66 of the Planning (Listed Buildings Conservation Areas) Act 1990 places a duty on the LPA to have special regard to the desirability of preserving listed buildings or their settings or any features of special architectural or historic interest which they possess.
- 8.21.7 Paragraph 11 of the NPPF sets out the presumption in favour of sustainable development which for decision taking means approving development proposals that accord with an up-to-date development plan without delay; or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date [footnote 8], granting permission unless the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed [footnote 7]; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.
- 8.21.8 Paragraph 12 of the NPPF states that the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.
- 8.21.9 Where, as in the case of the application proposals, inappropriate development is proposed in the Green Belt the NPPF 152 provides that the application should not be approved 'except in very special circumstances.' If very special circumstances are shown to exist, the harm by inappropriateness and any other harm is clearly outweighed by other considerations. This balancing exercise is applied by CS Policy CP11 and DMP Policy DM2 consistent with the NPPF.
- 8.21.10 As is recognised in the assessment above the proposed development constitutes inappropriate development in the Green Belt. In addition to the harm to the Green Belt by reason of inappropriateness, it has been shown that the development would result in other harm. The other harm is identified as:

- Loss of the openness of Green Belt and conflict with purposes of including land within Green Belt (set out in section 8.4 of this report); **substantial weight** is to be attached to this harm to the Green Belt applying the NPPF and Policies CP11 and DM2.
- Less than substantial harm to the significance of the heritage assets (set out in section 8.5 of report) – Grade II* Listed Buildings are considered to be assets of highest significance as such **substantial weight** is attached to the identified less than substantial harm to the heritage assets and to the conflict with Policy CP12 and DM3
- Adverse impact on the character of area (set out in sections 8.5 and 8.6 of report) – **Significant weight** is to be attached to the adverse impact on the character of Langleybury Lane and wider landscape impacts and the conflict with Policies CP12 and DM7.
- Loss of an allocated housing site and conflict of the development with the Langleybury and The Grove Development Brief (set out in sections 8.2 and 8.3 of this report); Considering the acute need for housing and affordable housing within the District and that an appropriate use of the site has been identified within an adopted development plan document that balances housing with economic development, **significant weight** is to be attributed to the loss of the housing site on existing brownfield land and the conflict with Policies CP1, CP2, SA1 and SA7.
- Unsustainable location of the site and proposing a development that would result in a heavy reliance on private modes of transport, **moderate weight** is to be attributed to the unsustainable location of the site and the conflict with Policies CP1 and CP12 of the Core Strategy.

8.21.11 There is no definition of what constitutes very special circumstances or what weight should be attached to any VSC, this is a matter of planning judgement. The very special circumstances forming part of the planning application consideration will be assessed against the following weightings: substantial, significant, moderate and limited.

8.21.12 The Development Plans Officer has commented on the application and has made reference to very special circumstances stating:

‘The site is located in the Green Belt. Policy CP11 of the Core Strategy (adopted 2011) states that ‘there will be a general presumption against inappropriate development that would not preserve the openness of the Green Belt, or which would conflict with the purpose of including land within it.’ Policy DM2 of the Development Management Policies LDD (adopted 2013) states that the construction of new buildings in the Green Belt is inappropriate, with certain exceptions listed in the National Planning Policy Framework (NPPF, 2021). The NPPF states, that inappropriate development is, by definition, harmful to the Green Belt and should not be approved unless the potential harm to the Green Belt by reasons of inappropriateness, and any other harm, is clearly outweighed by other considerations. The application supporting documents state the following benefits anticipate the very special circumstances in the NPPF; contribution to the economy and employment opportunities, heritage value, sustainable development, ecology and biodiversity net gain and inclusion of public space, open space and shared facilities with local services. On this basis, the development of a film hub on this site can be considered as very special circumstances.’

8.21.13 As stipulated within the NPPF (para 153) ‘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’. This requires a balancing exercise weighing inappropriateness and other harm, against the other considerations, namely, the benefits of the proposed development. The Development Plans Officer identifies that the development would be inappropriate but has not conducted an exercise to identify any other harm resulting from the proposal. No proper weighting of the benefits submitted in support of the application against the harm caused to the Green Belt

and any other harm has been carried out by the Development Plans Officer. As such, a proper assessment as to whether very special circumstances exist has not been conducted by the Development Plans Officer. A full assessment by officers is set out below.

Very Special Circumstances

- 8.21.14 A document titled Langleybury Film Hub - Planning Benefits & Very Special Circumstances Note has been submitted in support of the proposed development. This document sets out the benefits associated with the proposed development. Including:
- Socio-Economic Benefits
 - Heritage Benefits
 - Education/Training Benefits
 - Public Benefits
 - Benefits to Natural Capital and Sustainability

Socio-Economic Benefits

Meeting an Existing Demand

- 8.21.15 Meeting the existing demand for film and television facilities, meeting local and national government policy and the requirement to facility the SW Herts film cluster are aspects of meeting an existing demand benefit.
- 8.21.16 The submitted documentation identifies that the proposed development would serve to meet the needs of creative industry. It would support one of Hertfordshire's key economic sectors as set out within CS Policy CP6 and the Herts LEP which includes the Herts Film and Production Action Plan. This action plan identifies that the film and TV production sector is amongst the most dynamic parts of Hertfordshire economy and is considered to be of strategic importance to the County. The development supports the aims and ambitions of national and local economic strategies.
- 8.21.17 It is noted that there are a number of large scale studios within Hertfordshire including Warner Bros sited within Three Rivers District. The proposed development does not seek to compete with these studios as it is not a studio space led scheme which would support the filming on site and wider studios. The craft area especially would provide a space for the supply chain industries that are pushed out of the larger studios in place of the provision of large studios. The provision of commercial property solutions, including the wider supply chain is identified by the LEP within the action plan.
- 8.21.18 A review of the submitted information was commissioned by Three Rivers to identify whether there was a case that the proposed development would meet the needs of the industry. This review included a series of interviews with representatives of the film industry. The findings as set out in the Review of Economic Evidence by Hardisty Jones Associates identifies that there is evidence of a pipeline of new studio space which outstrips expected demand in purely quantitative terms. However, it is expected that not all of this will be delivered. The report does however identify that:

'The LFH proposals are welcomed by all consultees for helping to overcome both of the key constraints on sector growth, Langleybury is well located and has an established reputation within the sector, both of which are identified by consultees to be important factors for its success. The LFH proposals offer something slightly different to the large studios and there are consistent expectations that it will be in demand.'

- 8.21.19 It is noted that the filming industry including employment and uptake of studios has been affected by the Actors and Writers Strike. The agent has however confirmed that due to the users of the current site the uptake in demand for the current facilities were not affected by the strike action. The current facilities are of smaller scale to that of the proposed development. The strike action does however identify the fragility of the industry for employees and service providers (such as studio space providers) that can affect demand.
- 8.21.20 **Substantial weight** is, accordingly, attached to the development meeting both the demands of the filming industry within an existing filming hub and providing small scale industrial units where there is a need for this within the District.

Economic

- 8.21.21 In relation to economic benefits the Review of Economic Evidence identifies that:
- ‘There will be positive economic effects of the proposed development.’
- 8.21.22 Paragraph 91 of the NPPF states that planning decisions should recognise and address the specific locational requirements of different sectors. Co-location with other comparative facilities within the south-west Hertfordshire Cluster, can be considered a beneficial factor given the Government’s support for investment in clusters. Considering that the proposed development would provide complementary facilities that would help supply chain industries that support other studios the co-locational factor of the site weighs in its favour.
- 8.21.23 The proposals would create significant employment (845 direct jobs and 695 indirect jobs during operation of the development not including during the construction phase) and an increase in GVA (£93.3 million) with additional employment and GVA associated with the construction phase of the development.
- 8.21.24 An Employment and Skills Plan will be delivered through the S106 Agreement in order to ensure that local recruitment and training initiatives are carried out both during the construction phase of the development and the long-term operation of the Studios. This would be accompanied by a £20,000 monitoring fee payable to the Council as per Regulation 122A of the CIL Regulations.
- 8.21.25 **Substantial weight** is, therefore, to be attached to the jobs and GVA economic benefits associated with the proposed development.

Education/Training Benefits

- 8.21.26 It is identified that the proposed development would deliver employment opportunities as set out above. However, when the application was submitted one of the immediate issues the applicant identified with supporting expansion of the creative industry is the lack of experience in the workforce. The creative industry is an insular industry where it is difficult for people seeking a job in this career to obtain on-the-job experience and break into the sector. The development includes the provision of a Propellor Stage Building in a similar location to the existing educational facility. The Social Values Briefing Note sets out how the Propellor Stages will be used in partnership with an educational facility and delivering an anticipated 882 paid placements (feature films) and 92 paid placements (short form). Placements are students or people seeking a career change sourced through the educational provider.
- 8.21.27 The Briefing Note sets out that the Propellor Building would consist of two stages where independent film makers, are offered the opportunity to access sound stage, production equipment, unit base, marketing and legal support, post production help, sound design, VFX (visual effects) and SFX (sound effects) services at discounted rates. In exchange the production takes on an agreed proportion of learner crew, allowing them to gain a first professional credit and be guided by experienced heads of department’. It is anticipated that the leasing of the Propellor Building for independent films will be in partnership with an

educational facility such as the University of Hertfordshire. The supporting evidence implies that the education provider will source the independent film productions who will be offered subsidies based on part of the production crew consisting of students or people seeking to work within the creative industry.

- 8.21.28 The Hardisty Jones Economic Review of the evidence identified the skills development proposals would provide an opportunity to deliver an opportunity for enhancing employment and career development to local residents of Three Rivers and Hertfordshire.
- 8.21.29 Provided the concept of the use of the Propellor Building as set out in the Social Values Briefing Note is secured to ensure the use of the building provides educational, training and access to relevant experience for students to gain real life on set experience is suitably secured **substantial weight** can be attributed to the education/training benefits submitted.

Heritage Benefits

- 8.21.30 The heritage benefits associated with the proposed development are set out within section 8.7 of the report and are fully detailed within the Heritage Building Report. The improvement and enhancement of all listed and curtilage listed buildings on site and removal of the lawful modern features include; Establishing a long term use of the Listed buildings, including the Grade II* mansion which is on the building at risk register, without the need for damaging modern interventions; reinstatement of primary views from the house; reinstatement of the productive garden, the garden of the mansion and the formal setting of the mansion; reinstatement of the water reservoir; removal of lawful detracting agricultural buildings and improving visibility of the heritage assets from public vantage points, are benefits that would weigh in favour of the proposed development.
- 8.21.31 **Substantial weight** is, accordingly, attached to the enhancement and long term use of the heritage assets proposed as part of the development. Although heritage benefits are identified as discussed in the balancing of VSC this does not outweigh the identified harm to the heritage asset as previously discussed.
- 8.21.32 It is noted that 16 heritage benefits are set out in paragraph 5.36 of the Planning Statement. The removal of any temporary buildings and hardstanding associated with temporary consent 20/1697/RSP (expires September 2024) has not formed part of the assessment of heritage benefits as these elements are required to be removed and the land returned to its former setting following expiration of the temporary consent – much of the land where the hardstanding and built form is located only benefits from temporary consent consisted of soft landscaping. Further, the enhancements to the parkland (not including the garden and walled garden) forms part of the natural capital benefits and are discussed below.

Public Benefits

- 8.21.33 The supporting evidence demonstrates that the proposed public benefits attached to the scheme include the enlargement of the areas of parkland that are publicly accessible, improvements to the network of walking and cycling infrastructure in the local area, the creation of a new Children's Farm building, the provision of a new shared car park facility to resolve existing parking challenges associated with St Paul's Primary School and a partnership with Sunnyside Rural Trust to employ disadvantaged adults from the local community in the management of the Estate.

The Children's Farm and parking area

- 8.21.34 The supporting documentation identifies the Children's Farm as a community facility. DM Policy DM12 supports the retention of community facilities. The pre-amble to this policy identifies community facilities as uses and facilities such as health, education, places of worship, facilities for arts and community halls and in rural locations public houses, post offices and petrol stations. The provision of a Children's farm would not fall under this use

or facilities. It has however been a long established use of the site and is visited by members of the local community. It is noted that the retention of the Childrens Farm use forms part of the development potential of the site as set out within the Development Brief for the development of the site. Retaining the use within part of the site and the provision of a more modern useable facility closer to the settlement of Abbots Langley and the primary school is a benefit of **moderate** weight.

- 8.21.35 The proposed car park would serve the Children's Farm and provide a pick up and drop off point for parents and students of the Primary School. The car park is fully endorsed by the school, and it would also serve as an overflow car park for the cricket club. Although this is of a benefit, it would also serve a small part of the community with no wider reaching benefits. In light of this no more than **moderate** weight can be attributed to the provision of the car park.

Increased public access to the parkland and addition of a toucan crossing

- 8.21.36 The proposal would provide additional pathways through the eastern part of the site. The openness and landscape character of the site is already appreciated from within the site along the existing PROW. The additional footpaths would provide additional access though the field where the existing PROW is located. A new footpath would lead to the canal, although the canal can already be accessed via the site. A new path will also be provided that would lead up to through the Rookery (woodland) to the school. It is noted that this could provide an alternative route for school children however the improved links would only link to Langleybury Lane thus would not provide any beneficial connectivity to wider routes or wider benefits other than providing an alternative route for walkers.

- 8.21.37 The proposal would provide a pedestrian link between the application site and Hunton Bridge via a Toucan Crossing across the A41. The provision of a Toucan Crossing would improve accessibility for pedestrians however this is required as a direct result of the proposed development at the request of Herts Highways Authority to help improve the sustainable connection of the site to public transport networks and release the sustainable measures set out in the Travel Plan. In terms of wider users there is already a well lit and well used subway sited slightly further along the A41 closer to the school and cricket club that is utilised by people accessing the school and Langleybury Lane.

- 8.21.38 The provision of the toucan crossing is linked with the enhanced access to be provided through additional walking networks. These would provide a benefit for people who wish to walk to the site and through the southern part of the site. There would be no wider benefits associated with the increased connection to Hunton Bridge and addition of walking paths, on a site that can only be accessed on foot and already has a degree of public access. Only **moderate weight** can therefore be attributed to this consideration.

Sunnyside Partnership

- 8.21.39 The supporting documents identify that the proposed development would provide a partnership with Sunnyside Rural Trust (a charity which trains people with learning disabilities to acquire skills in rural and retail activities) to assist in the management of the estate. The potential future partnership with Sunnyside is a positive attribute of the scheme and a revised version of the Draft HOT sets out the commitment to progress with this partnership if planning permission is granted. The Social Value document identifies that a minimum of 4 and maximum of 8 full time opportunities would arise from this partnership. Considering the limitations of scale of opportunity that would be delivered through the partnership only **moderate weight** can be attributed to this consideration.

- 8.21.40 Natural Capital

BNG, arboricultural and environmental enhancements

- 8.21.41 The development would provide 28% biodiversity net gain, and this will be provided through the works identified within the Green and Blue Infrastructure Strategy. Policy DM6 requires development to not result in a net loss of biodiversity however does not seek a net gain. The provision of such a high net gain in biodiversity, in excess of the mandatory net gain requirement (which does not apply to this development because the application was submitted prior to the commencement of mandatory net gain), shows the applicant's commitment to the environment and is a benefit that weighs in favour of the proposal. It is however noted that part of the blue infrastructure is associated with the sustainable drainage measures required to be secured as part of the development thus is as a direct result of the infrastructure needs of the proposal.
- 8.21.42 The natural capital gains associated with the scheme have been independently audited and following this assessment it has been confirmed that the proposed development has been awarded a Building with Nature Award. Building with Nature ensures that nature is at the heart of development in a way that's good for people and for wildlife. To achieve this Building with Nature (BwN) provides a set of Standards, which provide planners and developers with evidence based, how-to, guidance on delivering high quality green infrastructure.
- 8.21.43 The Building with Nature Award identifies that the applicant is committed to the delivery a development of high biodiversity and environmental quality that will provide biodiversity benefits to the site. The NPPF at paragraph 186 states that:
- 'When determining planning applications, local planning authorities should apply the following principles:
- d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity'
- 8.21.44 The primary objective of the development is to deliver a film hub. Biodiversity enhancements and conservation is integrated as part of the design of the development and as identified by Herts Ecology would secure measurable net gains for biodiversity on site.
- 8.21.45 Given the extent to which biodiversity net gain would exceed the 10% requirement set out in the Act, **significant weight** is attributed to this consideration.

Sustainability

- 8.21.46 It is proposed that the development would be fossil fuel free. The development would also provide 86% less carbon emissions than current building regulations which far exceeds the current policy requirements.
- 8.21.47 The applicant's commitment to provide a fossil fuel free, energy efficient development is evident. Three Rivers District Council declared a 'Climate Emergency' in 2019. The Climate Change Motion put forward by Members commits the council to use all practical means to reduce the impact of council services on the environment, use all planning regulations and the Local Plan to cut carbon emissions and reduce the impact on the environment. Following the declaration of the 'Climate Emergency' Three Rivers District Council agreed a Climate Change and Sustainability Report at its Full Council meeting on 25 February 2021. The TRDC Climate Strategy is not a planning document, but an overarching Council Strategy which is informed by the draft policies in the new Local Plan. Paragraph 164 of the NPPF requires that new development should be planned for in ways that can help to reduce greenhouse gas emissions the proposed fossil fuel free and 85% reduction in carbon emissions would be in accordance with the principles of the NPPF and Development Plan. Considering that there would however be significant reliance on private modes of transport by employees (estimated 70% of staff), the on-site sustainability measures would help to

mitigate against the heavy reliance on private modes of transport that would be generated by the proposed development.

- 8.21.48 The proposed development would exceed the development plan requirements in delivering carbon reductions and provide a fossil fuel free development. Whilst the sustainability of the proposed development is commended the impact of development on climate change through reduction in carbon emissions and reliance on fossil fuels should be integral to the design principles of development proposals and serves to meet the environmental objective of the sustainable development principles as set out within the NPPF. The energy efficiency methods relate to the development of the site and the benefits associated with this would be neutral as they would not provide any wider ranging benefits. It is noted that the filming industry is also encouraging more sustainable methods which the development would help to achieve as such facilitates good marketing for the site. Further, as identified within Chapter L of the Environmental Statement, Greenhouse Gas Emissions during the construction and operational phases of the development would have an impact on climate change and there would be a heavy reliance on private modes of transport to service the proposed development from employees, deliveries and support vehicles. The carbon efficiency of the proposed development would therefore help to mitigate any potential effects of the development through use by private modes of transport and construction of the development rather than deliver wider reaching benefits.
- 8.21.49 **Limited weight** is therefore attached to the sustainability measures proposed as part of the development of the site.
- 8.21.50 The NPPF however states (paragraph 164) ‘that In determining planning applications, local planning authorities should give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic’. Thus, improvements to the efficiency of the existing buildings through energy efficiency and low carbon heating improvements could hold significant weight in favour of the development. The supporting context as set out in the Energy Statement (Appendix 15) and ES Appendix L (Climate Changes and Resilience) does not identify any energy efficiency improvements to the existing buildings on site.
- 8.21.51 The application is supported by a Social Value Briefing Note the contents of which has been considered when attributing weight to the relevant benefits associated with the scheme.

Where the development is inappropriate, whether the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations, so as to amount to very special circumstances necessary to justify the development within the Green Belt.

Table 1 – Assessed weighing against other considerations

Benefits	Weighting
Meeting Existing Demand	Substantial
Economic	Substantial
Heritage	Substantial
Educational/training contribution	Substantial (based on the use being secured by way of S106 in partnership with an educational facility)
Biodiversity	Significant
Childrens Farm	Moderate

School Car Park	Moderate
Public Access	Moderate
Sunnyside Trust Involvement	Moderate
Sustainability	Limited

- 8.21.52 The government attaches great importance to the Green Belt as set out in the NPPF. Substantial weight is attached to any harm to the Green Belt by reason of inappropriateness and any other harm arising from the proposal. The proposed development is inappropriate development, would adversely impact on the openness of this part of the Metropolitan Green Belt and conflict with the purposes of including and within it. The development would also result in less than substantial harm to the significance of the Grade II* and Grade II listed heritage assets, cause harm to the character and appearance of the area, conflict with the development plan through loss of an allocated housing site and proposes significant development in an unsustainable location.
- 8.21.53 The development would help meet current and projected demands for the filming industry, generate job creation, GVA and provision of an educational facility. The proposal would deliver heritage benefits, high levels of biodiversity net gain of significant to substantial weight that materially weigh in favour of the development. Public benefits through the retention of the children's farm, school car park and access and partnership with Sunnyside Rural Trust would weigh in favour but this of only moderate weight.
- 8.21.54 Only limited weight can be attached to the sustainability measures identified.
- 8.21.55 The determination of whether very special circumstances exist is a matter of planning judgement based on a consideration of all relevant matters. Very special circumstances cannot exist unless the harm to Green Belt, and any other harm, is clearly outweighed by other considerations. For the development to be acceptable in the Green Belt, within the setting of heritage assets in the open countryside the overall balance of other considerations must decisively weigh in favour of the development.
- 8.21.56 Although there are notable benefits associated with the development the totality of the other considerations as set out in the Table 1 above do not clearly outweigh the combined weight of harm to Green Belt by virtue of inappropriateness, loss of openness and conflict with the purposes of including land within it, less than substantial harm to the significance of the heritage assets, harm to the character and appearance of the street scene and landscape character, loss of an allocated housing site and conflict with the development plan in this regard and unsustainable location of the site. As such, the other considerations do not clearly outweigh the identified harm, and the very special circumstances necessary to justify the development are not shown to exist. The application is therefore recommended for refusal.

9 Recommendation

9.1 That PLANNING PERMISSION BE REFUSED for the following reason(s):

- R1 The proposed development would constitute inappropriate development in the Green Belt, would result in harm to openness in both spatial and visual terms, and would conflict with one of the five purposes of including land within the Green Belt. Substantial weight is given to the harm to the Green Belt. Other harm has been identified to the character and appearance and landscape of the area, unsustainable location and loss of an allocated housing site. The harm to the Green Belt and other harm is not clearly outweighed by other material considerations such as to constitute

the Very Special Circumstances necessary to permit inappropriate development within the Green Belt. The development is therefore contrary to Policies CP1, CP11 and CP12 of the Core Strategy, Policy DM2 of the Development Management Policies LDD and the NPPF (2023).

- R2 The proposed development, by reasons of its form, scale, layout and location would result in the addition of incongruous and alien features in the historic parkland landscape that would architecturally compete/contrast and dominate the heritage assets and result in low to mid less than substantial harm to the setting and significance of the Grade II* Listed Building (Langleybury House), Grade II Listed Buildings (Stable Block, Aisled Barn, Cottages) and curtilage listed buildings (South Lodge, West Lodge, Former Gardner's Accommodation, E Shaped Barn, Former Laundry Building and Historic Garden and features). The identified harm to these designated heritage assets is not considered to be outweighed by public benefits and there is no clear and convincing justification for the identified harm to their significance. The proposed development would, therefore, be contrary to Policies CP1 and CP12 of the Core Strategy (adopted October 2011), Policy DM3 of the Development Management Policies DPD (adopted July 2013), The Langleybury and The Grove Development Brief, and paragraphs 206 and 208 of the NPPF (2023).
- R3 The proposed development to the southern part of the site, by virtue of its scale, siting and use would result in an incongruous feature within the open and rural setting of Langleybury Lane and the character of the area. The proposed development would introduce an urbanising and contrived form of development that would result in the loss of open and rural character, causing significant demonstrable harm to the character and appearance of the area, contrary to Policies CP1 and CP12 of the Core Strategy (adopted October 2011), Policy DM7 of the Development Management Policies LDD (adopted July 2013) The Langleybury and The Grove Development Brief and the NPPF (2023).
- R4 In order to maximize sustainable travel options, a financial contribution towards supporting the improvement of cycling and walking routes in the vicinity of the site is required. In the absence of a relevant completed undertaking under the provisions of Section 106 of Town and Country Planning Act 1990, the development fails to meet this requirement. The application therefore fails to meet the requirements of Policies CP1, CP8 and CP10 of the Core Strategy (adopted October 2011) and the NPPF (2023).

9.2 **Informatives:**

- I1 The Local Planning Authority has been positive and proactive in considering this planning application in line with the requirements of the National Planning Policy Framework and in accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2015. Whilst the applicant and/or their agent and the Local Planning Authority discussed the scheme during the course of the application, and additional information was provided, the proposed development as amended fails to comply with the requirements of the Development Plan and does not maintain/improve the economic, social and environmental conditions of the District.

Appendix 1:

Langleybury Film Hub – Consultee Comments

1.1 Statutory Consultation

1.1.1 Abbots Langley Parish Council: [Object]

1.1.1.1 **Comments received on original plans:**

Members appreciate the driving force behind this development and acknowledge it would enhance local employment opportunities and achieve some of the aspirational points presented within the draft Neighbourhood Plan.

Members feel; however, this application demonstrates inappropriate development within the greenbelt whilst not demonstrating any special circumstances that would permit it. Members strongly object to the siting of the proposed structures towards the west ridge of the site, setting them on the west boundary. Their Height, Location and Scale (17.5m) would have a detrimental effect on the residents of Hunton Bridge to whom the buildings would be a large skylined ribbon of development presenting an overbearing backdrop.

Whilst members acknowledge the removal of the school structure, it should be noted that this structure is highly visible, despite being situated within the lower areas of the site. This further demonstrates the detrimental effect that the development would have as its siting on the topography would have a far higher ridge line and therefore be highly visible.

Members also believe the development would result in the greenbelt boundary being pushed significantly further west from the current urban boundary set on the River Gade. Resulting in an effective deepening of Hunton Bridge whose historic boundary lies to the east of the River Gade with its Banks forming the edge. Minimal development lies to the west of the Gade and is limited to the immediate bank side area. Whilst we appreciate that the current proposal for the lower area between the proposed development to the west and the Gade to the east would be historical and community gardens, the Precedent of allowing this development would open opportunities for future ‘infill’ development within this void.

The development abutting Langleybury Lane, would demonstrate that the junction of Old House Lane, or the journey from Chandlers Cross, would give the impression of Hunton Bridge starting on this west boundary, with the A41 being a Thru Route. This is completely out of character with the current historic context. The density and location of the proposed structures would block views across the valley and onto the site, further strengthening the belief that this is full urban infill and not a Ribbon Development.

The proposed community garden and accessible parkland would provide valuable community space, but the areas have limited accessibility on foot, and they further demonstrate a damaging spread of the urban environment across the River Gade. Members feel the same aims could be better achieved in other ways closer and more accessible to the central population within the Urban context.

1.1.1.2 **Comments received on amended scheme:**

Members acknowledge the slight reduction in buildings occupying the highest point on the site however this does not eliminate members overall concerns regarding the inappropriate nature of this development in greenbelt, the scale of buildings visible from Abbots Langley, and the concern that this development would push the boundary of Abbots Langley out to the M25 slip road that borders the proposed development therefore members maintain their objection to this application.

1.1.2 Three Rivers District Council Landscape Consultant (External Consultant comments on landscape impacts): [No objection]

1.1.2.1 **First comments received 9 January 2023 providing recommendations:**

Thank you for consulting us on the Hybrid application for the creation of a Film Hub to include detailed approval for demolition of a number of existing buildings including children's farm buildings and change of use of Langleybury House and Aisled Barn for filming and the construction of a cafe within the Walled Garden, new car parking area to north of site, alterations to existing access points along Langleybury Lane, change of use of the L Shaped Barn (to multi purpose use including cycle hub, showers and vehicle storage) and change of use of ground floor of the existing Laundry to reception facility, together with outline planning approval (matters reserved: Scale, Layout, Appearance and Landscaping) for change of use of site to a Film Hub to include Craft Workshop buildings, Sound Stages, Support Workshops, Production Offices, Backlots, Film and Television Training Facility Building, Offices, Ancillary Buildings, parking areas and relocation of Langleybury Children's Farm including new farm buildings. Alterations to existing cycle path and pedestrian network within the site, to include provision of a new pedestrian/cycle access within the site to the A41.

This letter sets out our consultation response on the landscape impact of the application and how the proposal relates and responds to the landscape setting and context of the site.

The following documents have been submitted for review:

- o Site Location Plan (dwg no. 2107-IFDO-00-RF-DR-A-0001, dated Oct 2022)
- o Outline Nature Recovery Plan (dated Oct 2022)
- o Lighting Assessment (dated Oct 2022)
- o Lighting Management Plan (dated Oct 2022)
- o Arboriculture Report (dated Oct 2022)
- o Veteran Tree Assessment (dated Oct 2022)
- o Green & Blue Infrastructure Strategy (dated Dec 2022)
- o Planning Statement (dated Oct 2022)
- o Design & Access Statement Rev C (dated Oct 2022)
- o Environmental Statement Volumes 1, 2 & 3 (dated Oct 2022)
- o Environmental Statement Addendum (dated December 2022)
- o Executive Design Summary Rev B (dated Nov 2022)
- o Detailed Area Landscape Masterplan (dwg no. DE509_300, dated Oct 2022)
- o Parameter Plan (dwg no. 2107-IFDO-00-RF-DR-A-1104 REV H, dated Oct 2022)
- o Masterplan Details
- o Proposed Site Sections
- o Existing Sections
- o Proposed Site Plan with Levels (dwg no. 2107-IFDO-00-RF-DR-A-1006 REV A, dated Oct 2022)
- o Light Monitoring Location Plan – Human (dwg no. SK-01 SHEET_01, dated Oct 2022)

- o Light Monitoring Location Plan – Ecological (dwg no. SK-01 SHEET_02, dated Oct 2022)
- o Assessed Scheme of Lighting 1-4
- o Site Demolition Plan (dwg no. 2107-IFDO-00-RF-DR-A-0505 REV B, dated Oct 2022)
- o Building Demolition Plan (dwg no. 2107-IFDO-00-RF-DR-A-0510 REV B, dated Oct 2022)
- o Masterplan Detail with Demolition Overlay (dwg no. 2107-IFDO-00-RF-DR-A-1030, dated Dec 2022).

The documents submitted as part of this planning application has been reviewed following a desktop study and a site visit by a Chartered Landscape Architect and Member of the Landscape Institute. The site visit was undertaken on a bright and clear day in late July 2022, when deciduous trees had full leaf cover and overall visibility was good.

The site lies in an undulating landscape comprising of broad topped hills and shallow valleys. The site occupies the east facing slope of a hill which lies on west side of the valley of the River Gade on the south-eastern side of the M25. The urban area of Abbots Langley lies to the north-west and Kings Langley is situated north of the M25.

Local Policy Context

The current Local Plan (2014) for Three Rivers District consists of the following Development Plan Documents:

- The Core Strategy (adopted October 2011);
- The Development Management Policies (DMP) Local Development Document (LDD) (2013);
- and
- The Site Allocations LDD (adopted November 2014).

Relevant policies within these documents include, but are not limited to:

- DM6: Biodiversity, Trees, Woodland and Landscaping (DMP LDD 2013)

This policy states under Section F: Trees, Woodlands and Landscaping that:

- i. Proposals for new development should be submitted with landscaping proposals which seek to retain trees and other important landscape and nature conservation features. Landscaping proposals should also include new trees and other planting to enhance the landscape of the site and its surroundings as appropriate.
- ii. Development proposals on sites which contain existing trees and hedgerows will be expected to retain as many trees and hedgerows as possible, particularly those of local amenity or nature conservation value or hedgerows considered to meet the criteria of the Hedgerows Regulations 1997.
- iii. Development proposals should demonstrate that existing trees, hedgerows and woodlands will be safeguarded and managed during and after development in accordance with the relevant British Standards.
- iv. Development should be designed in such a way as to allow trees and hedgerows to

grow to maturity without causing undue problems of visibility, shading or damage. Development likely to result in future requests for significant topping, lopping or felling will be refused.

v. Planning permission will be refused for any development resulting in the loss or deterioration to protected woodland (including ancient woodland), protected trees (including aged or veteran trees) and hedgerows, unless conditions can be imposed to secure their protection.

vi. Where the felling of a tree or removal of a hedgerow is permitted, a replacement tree or hedge of an appropriate species, size and in a suitable location will be required, taking account of issues such as landscape and biodiversity.

vii. Areas forming part of development proposals which are to be transferred to the local authority for maintenance should be designed for ease of access and low cost maintenance overheads and management regimes.

▪ DM7: Landscape Character (DMP LDD 2013)

Section B: Landscape Regions of this policy it states:

In all landscape regions, the Council will require proposals to make a positive contribution to the surrounding landscape. Proposals that would unacceptably harm the character of the landscape in terms of siting, scale, design or external appearance will be refused planning permission. The Council will support proposals that:

- i. Lead to the removal or a reduction in the impact of existing structures and land uses that are detrimental to the visual quality of the landscape
- ii. Enhance public access and recreation opportunities without detriment to the landscape or wildlife
- iii. Contribute to delivery of Green Infrastructure
- iv. Contribute to the measures identified in the Hertfordshire Landscape Strategy 2001 to strength, reinforce, safeguard, manage, improve, restore and reconstruct landscapes.

▪ It's also acknowledged that Policy SA7 of the Site Allocations LDD identifies the site as potentially being appropriate for hotel/leisure development and residential, with the continuation of agricultural uses also identified as remaining appropriate. On this basis, the film hub proposal is not in clear accordance with the uses identified in Policy SA7 and that, as such, any subsequent planning application would represent a departure from the Current Local Plan.

Landscape and Visual Impact

The application has been supported by a Landscape Visual Impact Assessment (LVIA) undertaken by Define on behalf of the applicant. The LVIA has been carried out accordance with the principles set out within the 'Guidelines for Landscape and Visual Impact Assessment', Third Edition ('GLVIA3') (2013) prepared by the Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA). The assessment includes a desktop study, a review of the landscape and visual baseline and an assessment of landscape and visual receptors, that includes value, susceptibility and sensitivity and an assessment of potential direct and indirect effects on landscape and the visual environment.

The methodology is generally supported; however, we advise the applicant reviews their criteria descriptions. For example, the Moderate Effect Criteria within Table D3.9 'Nature of Effect Criteria' states "the proposals would cause a barely perceived deterioration in the character and amenity of the view from the range of visual receptors and a range of distances". We would understand this to be an error and would advise it is amended to ensure the description aligns with the scale of effect.

Review of Landscape Character

The importance of understanding the landscape character of all landscapes in England is recognised in the NPPF, which states that planning policies and decisions should contribute to the natural environment by: "recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services". Landscape character assessment is the process which can identify these intrinsic values and unique characteristics of the diverse landscapes in the UK.

The LVIA has identified the landscape baseline of the site as including the National Character Area (NCA) as defined by Natural England and the Hertfordshire Landscape Character Assessment.

The Site is located across two National Character Areas (NCA). The eastern part of the site falls within NCA 111: Northern Thames Basin, whilst the western part of the site is part of NCA 110 Chilterns.

The Northern Thames Basin is a large and diverse landscape with a similar overarching character of agricultural land, interspersed with woodland, dissected by rivers and influenced by the urban areas of North London. Statements of Environmental Opportunity (SEO) are identified as part of the NCA guidelines. These include:

- SEO 3: Protect and appropriately manage the historic environment for its contribution to local character and sense of identity and as a framework for habitat restoration and sustainable development, ensuring high standards (particularly in the London green belt) which respect the open and built character of the Thames basin. Enhance and increase access between rural and urban areas through good green infrastructure links to allow local communities recreational, health and wellbeing benefits.
- SEO 4: Manage and expand the significant areas of broadleaf woodland and wood pasture, and increase tree cover within urban areas, for the green infrastructure links and important habitats they provide, for the sense of tranquillity they bring, their ability to screen urban influences and their role in reducing heat island effect and sequestering and storing carbon.

In contrast, within the NCA Chilterns, views are enclosed within branching valleys, sunken routeways and extensive woodland and hedgerow-enclosed fields. There are hidden, tranquil pockets along single track lanes and rights of way. The SEOs include:

- SEO 1: Manage the wooded landscape, the woodlands (including internationally important Chilterns beechwoods), hedgerows, commons and parklands with the aims of conserving and enhancing biodiversity and the historic landscape and its significant features; maximising the potential for recreation; and securing sustainable production of biomass and timber.
- SEO 4: Enhance local distinctiveness and create or enhance green infrastructure within existing settlements and through new development, particularly in relation to

the urban fringe and growth areas such as Luton. Ensure that communities can enjoy good access to the countryside.

The most localised Landscape Character Assessment for this site is the County level Hertfordshire Landscape Character Assessment. Within this assessment, the application site is located within the Lower Gade Valley Landscape Character Area (LCA) with the Upper Gade Valley LCA to the north and Sarratt Plateau LCA to the west.

The key characteristics of the Lower Gade Valley LCA include:

- narrow valley floor with wide canal and wetland habitats
- historic parkland landscapes, some in declining condition
- historic houses set on the plateau edge looking over the valley
- arterial routes and M25 to north of area
- gently sloping valley sides with minor secondary valleys
- urban development hidden by vegetation or set back from the slopes
- individual woods within parklands
- extensive public access to the south
- important mosaic of wildlife habitats adjacent to urban population

We would however conclude that the most distinctive feature of this landscape is the gently sloping valleys, historic parkland landscapes and mosaic of wildlife habitats.

We note that the applicant does make reference to the LI Technical Guidance Note (TGN) 'Assessing the Value of Landscapes Outside National Designations' 02-21 but has not been used in its entirety to assess the value of the Site. However, the assessment methodology does define the landscape features that provide value and on balance we are satisfied with the method used for assessing landscape value.

Of the effects judged, those that have been deemed significant are:

- LCA 11: Lower Gade Valley (Operation Stage Year 1) medium-high sensitivity landscape receptor would receive an effect that is Moderate-Major Adverse.
- Site and immediate setting (Operation Stage Year 1) medium-high sensitivity landscape receptor would receive an effect that is Moderate-Major Adverse.

At Year 15 it is judged that the nature of effect on LCA 11 and the Site and immediate setting landscape resource will go from "purely adverse to both adverse and beneficial. Whilst the scale of the effects is still identified as Moderate-Major, the effect is now considered to be Not-Significant as the benefits identified above offset the direct adverse changes to these landscape receptors" Although we agree that the establishment of the mitigation strategy will change the level of effect on these landscape receptors, we would argue that overall, the nature of effect remains as adverse given the introduction of large structures such as Sound Stages, Backlots and Ancillary Buildings will have an urbanising effect. However, the level would reduce from 'Moderate-Major adverse' to 'Minor-Moderate adverse' and therefore not be deemed significant in EIA terms.

Notwithstanding the above, we note that the Summary of Effects table (Table D8.1) does not reflect the judgements determined in the Chapter. For example, Lower Gade Valley and Site and Immediate Setting – Year 1 Operation Stage are deemed Significant. But in the table, they are judged as 'neutral' at Year 1, as well as Year 15.

Night-time character and Lighting

We note that a lighting assessment has been undertaken and welcome the details on the baseline night-time situation / existing sources of lighting in the landscape and supporting photography.

Fundamentally this assessment has considered the impact on human receptors from night-time views to proposed lighting. However, we would still expect to see an assessment of the anticipated change in lighting and the effect this would have on landscape receptors such as LCA 11: Lower Gade Valley and the Site and immediate setting.

Visual Amenity

Visual effects are a result of the sensitivity of visual receptors (people who will experience changes to existing views) to the proposed development and the magnitude of those changes. The visual envelope of the proposed development is influenced by the proximity of existing built form within the local area, the relatively level topography and limited established vegetation therefore we accept that the proposed viewpoints are adequate and represent the visual envelope appropriately.

The appraisal has identified visual receptors within the Study Area that are likely to have visibility of the Proposed Development. These include [but are not limited to]; Bridleway 045, PROW 038, Grand Union Canal and Langleybury Lane. Though for the majority of the assigned value, susceptibility and sensitivity judgements we are in agreement. It's worth noting that for all Visual Receptor Groups the visual sensitivity has been assigned the lowest judgement. For example, Visual Receptor Group 2 has been assigned a value of medium and a susceptibility of medium-high, resulting in an overall sensitivity of medium. Whilst Visual Receptor Group 3 has been assigned a medium-high value and a susceptibility of medium, also resulting in a medium sensitivity. The Receptors have differing judgements, yet the same outcome. Clarification is sought as to the justification for these choices.

Verified photography was undertaken in August 2022. Generally, we welcome the presentation of the photographs and the inclusion of the wirelines in accordance with The Visual Representation of Development Proposals Technical Guidance Note (TGN) 06/19 (Landscape Institute, September 2019). Preferably, photography should be undertaken in the winter months when leaf cover and screening are at a minimum and therefore representative of the worst-case scenario. However, we do note that the seasonal effect has been considered as part of the assessment as stated in Para D3.39.

On review, we are of the judgement that the adverse visual impacts will primarily be limited to the local area, given the topography of the landscape and the vegetation within the immediate setting of the site.

This does not however mean that the localised impacts are not of significance and should still be of material consideration.

For example, at Year 15, we agree that the magnitude of change will reduce in leaf conditions, however we are of the judgement that the scale of effect on local visual receptors such as Langleybury Lane will still be significant at Year 15, especially when you consider winter views. There is a strong reliance on mitigation measures such as a hedgerow (to mature up to 4m in height) and 10m tree planting along Langleybury Lane. Although these landscape elements do provide some necessary screening, these measures contradict the current open countryside and parkland

views that can currently be experienced and will not fully screen the proposed built form.

Cumulative Impact

The assessment of cumulative landscape or visual effects (Chapter P: - Cumulative and Residual Effects) follows the same methodology as the assessment undertaken in the LVIA (Chapter D of the ES) in that the level of effect is determined by assessing the sensitivity of the receptor and the magnitude of change, although the cumulative assessment considers the magnitude of change posed by multiple developments.

Proposed schemes as part of Warner Bros. Studios (Ref 22/0491/FUL, 20/2667/FUL, 22/0918/FUL and 19/1944/FUL) (referred to as schemes 6-9) have been considered as potentially having a cumulative effect during construction and operation phases.

From a landscape perspective, the assessment notes that the proposed built form associated with schemes 6-9 will de-sensitise the LCA 11 landscape receptor but will not have any notable additional effects during construction or operation. Though we don't necessarily completely agree with this judgement, it's felt that any additional change would not be significant.

In regard to visual amenity, it states that Visual receptor 9 (users of the public right of way to the east of the River Gade (Bridleway 40) will be slightly de-sensitised by increased visibility of built form associated with schemes 6- 9 but is unlikely to result in any notable additional effects at construction or operation stages, or any additional residual effects. We agree with this judgement.

Layout and Landscape Design

Notwithstanding the matters raised above, the inclusion of a Green Infrastructure Strategy as part of the application submission and the reference to Building with Nature and the 12 Standards is welcomed.

We do however seek clarification as to who has/is undertaking the assessment and ask that they are an Approved BwN assessor. Similarly, we ask whether a review from the BwN team has been undertaken to establish whether all standards at this application stage have been met.

As a design response and to help mitigate visual impact, we would also recommend that an Environment Colour Assessment (ECA) is produced to inform the colour palette for built form. The objective of an ECA is to help to resolve many of the issues associated with colour selection and specification and aid landscape and visual mitigation and enhancements. Commonly, the Natural Colour System (NCS) is used to identify the relevant colours; however, there are further details of the process available in the Landscape Institute ECA technical note (04/2018).

We would also recommend the following landscape principles and design amendments are explored:

- o The built form edge should be pulled further away from the western boundary and stronger edge to the countryside through mitigation planting commensurate to the scale of development being proposed. This could be accomplished by predominantly through woodland shaw / belt planting of native species and the creation of an 'ecotone' of native scrub / thicket and wildflower planting to assist the transition from built development to rural countryside.

o The blue Infrastructure section of the GI Strategy refers to drainage flow paths. We seek clarification as to whether there will be underground pipe systems in place, or whether nature based above ground solutions will be used?

Summary and Conclusion

Overall, based on our site visit and desktop study we consider the site has sensitive landscape qualities both designed, and natural, which need to be conserved. Though we are not fully opposed to the principle of development within this location, we are of the professional judgement that the proposed development will have an adverse impact both on visual amenity and landscape character and therefore noted errors need amending and clarifications are sought. In addition, the following information is still outstanding and needs to be provided prior to determination:

- An Environmental Colour Assessment (ECA).
- A landscape night-time assessment needs to be undertaken.

If you have any queries regarding the matters raised above, please let me know.

1.1.2.2 **Comments, dated 19 December 2023, on the revised scheme and submission of additional information:**

Thank you for consulting us on amended Hybrid application for the creation of a Film Hub to include detailed approval for demolition of a number of existing buildings including children's farm buildings and change of use of Mansion House and Aisled Barn for filming and the construction of a cafe within the Walled Garden, new car parking area to north of site, alterations to existing access points along Langleybury Lane, change of use of the L Shaped Barn (to multi-purpose use including cycle hub, showers and vehicle storage) and change of use of ground floor of the existing Laundry to reception facility, together with outline planning approval (matters reserved: Scale, Layout, Appearance and Landscaping) for change of use of site to a Film Hub to include Craft Workshop buildings, Sound Stages, Support Workshops, Production Offices, Backlots, Film and Television Training Facility Building, Offices, Ancillary Buildings, parking areas and relocation of Langleybury Children's Farm including new farm buildings. Alterations to existing cycle path and pedestrian network within the site, to include provision of a new pedestrian/cycle access within the site to the A41.

This response sets out our updated comments following the submission of further additional information regarding the site wide levels and contours, lighting, and SuDS strategy. These comments build on our previous response dated 20/11/2023.

Lighting

Drawing titled 'Assessed scheme of Lighting SK-03 SHEET 03' details the proposed lighting for the backlot area. Specifically, and including, Buildings 02-01 and 02-02 which are specified with 'Philips ClearFlood LED360-4S/830 DX51' mounted at 6m. This lighting facing easterly and will illuminate the backlot area. This point of the site is one of the most exposed and raised areas.

Drawing titled '1222007 LFH SK-04 Sheet_02 REV_C Light Spill' details the analysis of the lighting spill from the building mounted flood lights (Buildings 02-01 and 02-02). The plan shows that the lighting spill will be contained within the backlot site, spreading less than 50% across this area.

No lighting due east area is proposed within the area labelled as 11-02 (backlot parking).

Appendix 7 Lighting Assessment includes a section titled 'Embedded by design & planned operation'.

The section states;

- *the erection of 2.4m high close-boarded timber fences as set out in Strenger Drawing ref: SK-04 Light Spill; and*
- *by risk-assessed design & operation (by others), not lighting specific areas of the Proposed Development site and providing lighting with reduced levels of illuminance and uniformity.*

In reference to bullet point 1- this boundary specification is not included within the Light Spill plans. The use of 2.4m close board fencing to reduce lighting spill will need to be reviewed alongside other negative impacts of introducing this boundary type to this location.

Additional Sections Dec 2023

Additional sections have been produced based on our comments made during the site visit. Sections 1 to 8 set out indicative cross sections of the access road and backlots; linear sections from the redeveloped south-western corner of the site have also been included. The sections also indicate the potential cut and fill land grading to facilitate the new development.

Based on the submitted sections, the proposed earth works are kept to a minimum. Section 6, backlot 2 indicates the greatest change in levels on site. The level change at this point reflects the extended area of the backlot due east, which is then graded to meet the sloping site at this point. Proposed planting and a post and wire fence at the point of the new level change provides a break to the proposed gradation.

DE509_600_LFH_Existing and Proposed Contours

We previously requested a plan indicating the existing and proposed contours across the site. The existing and proposed contour lines are mapped on this submitted plan. The contours are set at 1m distances and detail how the proposed earthworks (at this stage) would tie into the existing site levels.

Alongside the additional sections, the contours plan provides a useful baseline of the impact of the proposed site and development. The proposed changes, alongside appropriate planting and mitigation have been managed in a sensitive and appropriate manner.

Indicative Backlot Parameter Plan

The backlot parameter plan sets out the initiative use and height thresholds for various locations within the backlot areas. The main area will be limited to a height of 20m with smaller, localised areas to the edge of the site being limited to 3m and 5m respectively. At this stage and level of detail submitted, together with the 'temporary use' of the site for sets and production it is noted that this is indicative. Proposed screening and additional tree planting has been proposed to mitigate long views back into the site.

Appendix 14 Outline Flood Risk Assessment_Part1

We previously raised a query regarding how the hybrid application would be able to deliver a strategic SuDS strategy across the site. The submitted flood risk and mitigation strategy is comprehensive and includes a study on page 13 fig. 9 which sets out the strategic approach to drainage catchments across three distinctive areas. Catchment 1 falls within part of the full application, catchments 2 and 3 within the Outline application areas. These distinct areas are deliverable in isolation whilst delivering a comprehensive site wide solution.

The additional information sets out a range of mitigation measures to lessen the impact of the development on this site. If minded for approval, further, more detailed sections/levels should be produced to demonstrate how the negative impact of the development could be mitigated further.

1.1.3 Three Rivers District Council Tree and Landscape Officer – [No objection relating to impact on trees]:

The submitted plans indicate that the proposals would have a substantial impact on trees, with 22% of B grade (moderate quality) trees, and 47% of C grade (poor quality) tree being removed to facilitate the development. However, no trees protected by Tree Preservation Order, and no veteran trees are proposed for removal. The plans indicate that extensive new and replacement tree planting would be undertaken following development.

If the application is approved, a condition requiring the tree protection method statement to be following before and during construction should be applied. Further details of remedial landscaping, and tree planting should also be required.

1.1.4 Three Rivers District Council - Conservation Officer: [Objects]

1.1.4.1 **First comments received dated 9 March 2023**

Heritage assets affected by the proposal:

- Langleybury House is a Grade II* listed building (list entry no: 1173157)
- Stable Block (Grade II, list entry no: 1100889)
- Aisled Barn (Grade II, list entry no: 1348205)
- 1, 2 and 3 Old Farm Cottages (Grade II, (list entry no: 1296346)
- The site also contains curtilage listed buildings and non-designated heritage assets

Initial thoughts:

- a) Considered inappropriate for scale to be a reserved matter
- b) Height parameters should be agreed through site section/elevation drawings
- c) Education and commercial zone building should not form part of the outline application. The full impact of the proposed building upon the setting of Langleybury cannot be adequately assessed. Scale and design would be fundamental to its acceptability from a conservation perspective.
- d) Concerns about PR12 (12-01-2) new commercial office space on the Parameter Plan forming part of the Outline and not the Full due to its proximity to the listed and curtilage listed buildings.

Detailed approval

Demolition of Childrens Farm Buildings

No objections to the demolition of modern farm structures.

Upper part of partially collapsed wall of boiler house to be remove; Is there scope for this to be repaired and retained or incorporated into the new structure.

Café Building

The scale of the café building raises concerns, the proposed structure is visually dominant. There is a recommendation to reduce the scale, so the ridge sits below or is the same height as the historic wall. At present, paragraph 202 and 206 of the NPPF would be relevant. There is a direct visual link to the Walled Garden from the principal house and whilst there is no in principle objection to a contemporary design approach, there is an opportunity for the structure to better reflect a traditional garden wall structure. The current design would appear overly modern with no reference to the character of historic garden structure. The at odds design, coupled with the scale would result in an incongruous addition to the site. There is also a recommendation to improve the appearance of the rear access to be more in keeping with the character of the asset.

Car Parking

Car parking to the north raises no in principle objections, details regarding landscaping can be secured by condition.

Access Changes

Changes to existing access to include widening raised no in principle objection, subject to details regarding, width, surface treatments and landscaping which can be secured by condition.

Change of Use

It is noted that the buildings on site have been used for filming for some time (some of which was unauthorised and subsequently granted on a temporary basis). It has been noted within previous advice the proposed use of filming is unlikely to be the assets' optimum viable use but would be beneficial in the short term to secure income for the repair and maintenance of the listed buildings.

There is a lack of information within the submitted information to demonstrate that the proposed change of use would secure the listed building's optimum viable use in the long term.

Regarding the L-shaped barn, the existing cobbled floor should be retained in-situ. A new suspended floor could be laid over the existing historic floor. This would preserve the historic floor in original location.

Outline/ Reserved Matters

There would inevitably be harm arising from the proposed scheme due to the fundamental alterations to landscape character, loss of open parkland associated with Langleybury House as well as quantity and design of built form within the setting of several heritage assets.

As noted above, there are concerns regarding some aspects of the scheme being reserved matters.

However, indications regarding scale have been outlined and proposed drawings submitted relating to the new structures. The below comments are relevant to the information submitted within this application.

Historic Core (new buildings)

12-01 Building E would be a barn type structure with traditional pitched roof, black cladding, clay tiled roof and modern glazed openings; No in principle objection to a new structure in this location, the appearance is considered sympathetic to the setting of the heritage assets. 12-02 Building F would be a single storey, timber frame structure with flat roof, glazed panels and sedum roof: The design is overly modern, contrasting with the traditional form and appearance of the existing historic farm buildings. It is recommended to amend the form and appearance of this structure to be more in keeping with the existing buildings.

Craft Buildings

Concerns were raised at pre-application regarding the proposed development surrounding the E shaped barn. The proposed buildings would isolate the E shaped barn from the historic core of the site and erode the legibility and understanding of the extent of the former farmstead associated with Langleybury House. The scale and appearance of the proposed buildings would be incongruous to the site and setting of the heritage assets. The number of units should be reduced, and the scale and form amended to be more in keeping with the character of the traditional farmstead.

Education and commercial zone

The existing school building is harmful to the setting of the listed buildings, and it would be positive to remove the existing school building from the site and reintroduce historic views. The principle of built form within this location has been agreed. However, the scale, form and appearance of the replacement building would be unacceptable. During pre-application, it was noted that the acceptability of any replacement building would be dependent on the details and that it should appear subservient to the principal house and more discrete than the existing school building. There are concerns that this aspect of the scheme forms part of the reserved matters. The submitted visualisations demonstrate how prominent the new structure would appear within the landscape, resulting in an architecturally competing addition within proximity to Langleybury House. The scale should be significantly reduced, and a more subtle design employed so the proposed new structure sits more discretely within the landscape.

South Site

The open parkland preserves the significance of the Langleybury House and associated heritage assets. The quantity, scale and appearance of the proposed structures within this area would dominate to landscape and fundamentally alter how the wider setting is experienced and understood. The quantity and scale should be reduced, and a more traditional form employed.

Large areas of hardstanding are proposed within this area which would adversely impact the verdant and rural landscape and setting of the listed buildings.

Children's Farm

Information relating to this aspect of the scheme is limited, although matters are reserved. However, the site is well screened from heritage assets by the dense tree screening, and it has been noted that main farm building will be a single-storey structure located in the lowest part of the site so that it is not visible from Langleybury Mansion.

Materials

There are some concerns regarding the proposed materials included within the Design and Access Statement. Although details relating to this matter are limited currently and advice can only be proportionate to the level of detail submitted. There are concerns regarding the corrugated metal and the use of dark materials on the large-scale buildings. Given the scale of development on site, it is recommended to produce a Design Code (or similar) that clearly sets out the design details of new buildings on the site.

Landscaping

The proposed boundary treatments within the landscape including 1 and 2m high post and wire fence; 1.5-2.5m high hedgerow that would run along the west boundary; hedgerow is not shown on the landscape master plan but is referenced within the Design and Access Statement. There are some concerns that this would be an intrusive feature within the historic landscape and impact views of heritage assets from Langleybury Lane.

There are some inconsistencies on landscape plans that should be rectified in order to provide fully informed feedback. It is unclear if the historic footpath to the historic footpath to the Grade II* listed Church of St Paul will be retained. There are also concerns about the quantity of lighting of modern lighting within a historic/ rural landscape and within the setting of the listed buildings.

Lighting should be kept to a minimum and be sympathetic to the setting of the listed building.

Clear and convincing justification

Presently, the change of use and filming structures have been granted approval on a temporary basis, and therefore once removed the harm would also be removed. This proposal would result in permanent changes to the setting of the Grade II* Langleybury House, associated Grade II and curtilage listed structures as well as non-designated heritage assets. It is acknowledged that there are aspects of the scheme that would be beneficial to the heritage assets significance, including improvements to their condition, removal of inappropriate modern structures (although these will be replaced by larger, modern structures), reinstatement of historic views and landscape enhancements. However, such benefits are not sufficient to outweigh the level of harm identified given the fundamental alterations to the site as well as the quantity, scale, form and appearance of the proposed new structures.

Additionally, there is insufficient information to justify the level of harm identified; The condition of the listed building's has deteriorated whilst in use for filming and there is a lack of guarantee regarding the long-term conservation of the heritage assets. I recommend a Conservation Management Plan is submitted to demonstrate how the proposal would secure the asset's optimum viable use and contribute to their long-term conservation.

The proposals would fail to preserve the special interest of the listed building, contrary to Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. With regards to the National Planning Policy Framework the level of harm is considered to be 'less than substantial' as per paragraph 202. Paragraphs 199, 200 and 206 would also be relevant.

1.1.4.2 **Second comments received, dated 6 December 2023, following submission of amended plans:**

The designated heritage assets affected by the proposal are:

- Langleybury House (Grade II* listed building, list entry no: 1173157)
- Stable Block (Grade II listed building, list entry no: 1100889)
- Aisled Barn (Grade II listed building, list entry no: 1348205)
- 1, 2 and 3 Old Farm Cottages (Grade II listed building, list entry no: 1296346)

The site also contains curtilage listed buildings, including South Lodge, West Lodge, Former Gardeners Accommodation, E-shaped Barn, Former Laundry, West Cottages, L-shaped barn, Southeast shed/ Garage Block as well as the curtilage listed features within the formal and walled gardens.

This is the second consultation within this application; initial advice pertaining to this application was provided on 09/03/2023. This formal application follows a PPA and pre-application which involved several on site meetings. In 2020, planning permission was granted for temporary change of use of the site and buildings to film studios (see application 20/1697/RSP).

Langleybury House is a large country house dating to the early eighteenth century and alteration in the mid-late nineteenth century. The house is set within its own grounds, which is bound to the north and west by Langleybury Lane, to the east by Watford Road and to the south by the road connecting the A41 and the M25. The historic parkland also includes the aforementioned curtilage listed buildings, the mid-late twentieth century school and structures associated with the children's farm. The parkland, Grade II listed buildings and curtilage listed buildings are an important part of Langleybury House's setting, they permit an understanding and appreciation of the asset's historic context as a large country house set within a rural landscape served by a several associated buildings, as well as the functional use of the farmstead serving Langleybury House and the wider estate. Although the setting of the assets has been compromised by the construction of the twentieth century school, some modern agricultural buildings, and the environmental effects of the M25, the historic parkland remains open, verdant and naturalistic in its character and use. This contributes to the experience and appreciation of the heritage assets in a rural, agrarian landscape, akin to their original setting. The historic parkland therefore makes a positive contribution to the significance of the Grade II* house, Grade II listed buildings and curtilage listed buildings.

DETAILED APPROVAL

Café Building

Previous advice at pre-application stage raised concerns regarding the scale of the café building and it was recommendation to reduce the scale, so the ridge sits below or is the same height as the historic wall. The proposed building has been reduced in scale which is positive. However, the height of the wall has been reduced (as shown on elevation 3 and 4) which results in the café building being more visible. The café building should be contained within the walled garden to lessen its visual impact in views from outside the walled garden. Previous comments from the first consultation within this application, dated 09/03/2023, which raised concerns regarding the appearance of the access door remain relevant; there is still an opportunity for the access door to be more in keeping with the character of the walled garden. It is also unclear why the wall would not be repaired to match its original height and reinstate its historic appearance, rather than lower a section of the wall.

The opportunities to mitigate the impact of the new building within the walled garden have not been fully realised. Concealing the building behind the wall and reinstating

the damaged section of wall to its historic height would improve this element of the scheme.

Access Changes

The proposed accesses do not appear to be indicative of a large country estate due to their appearance, including the width, line painting and central reservation with crossing and would contribute to the overall urbanising impact of the full scheme on the designated and non-designated heritage assets.

OUTLINE MATTERS

I acknowledge that there has been a reduction in the quantity and scale of proposed development within the site and additional green space proposed. However, this is not considered sufficient to reduce the degree of harm identified within previous advice. Previous advice dated 09/03/2023 considered the proposals to result in 'less than substantial' harm to the significance of Langleybury House and other designated heritage assets due to the impacts of the new development on their wider landscape and parkland setting.

There would inevitably be harm arising from the proposed scheme due to the fundamental alterations to landscape character, loss of open parkland associated with Langleybury House as well as the scale, quantity, and appearance of the development. The proposed development would be of an industrial scale and appearance which would be extremely inappropriate within the setting of the heritage assets which have been experienced in and draw significance from a largely undeveloped, rural landscape for hundreds of years. The proposed development would introduce development that would architecturally compete/ contrast with and dominate Langleybury House and the historic farm buildings/ cottages to the southwest and west of the house. This is particularly noticeable in viewpoints 1, 4, 5 and 6 within the visual illustrative views document.

The heritage statement notes that the removal of the school building, and other unsympathetic and temporary structures would be a benefit of the scheme. However, these would be replaced with a significant amount of built form (greater than the existing built form on site), that would also be inappropriate development within the setting of the designated heritage assets. The proposal would introduce permanent structures, and therefore the harm would be irreversible.

It remains unclear how the sound stages and craft zone will contribute to the optimum viable use of the heritage assets given this was established in a previous application. Advice pertaining to application 20/1697/RSP (for the use of Langleybury House for filming and the erection of temporary structures close to the house) stated that there would be 'less than substantial' harm to the significance of the designated heritage assets by virtue of some of the filming related activities (including the erection of temporary structures). However, the harm arising from the filming activities was balanced against the heritage benefit of on-going repairs and long-term maintenance of the listed buildings, one of which is on the Heritage At Risk Register, and that once filming ceased, the temporary structures would be removed.

Landscaping

A large area of hardstanding is proposed to the east of Langleybury House with no marked bays. It is annotated on the mansion carpark masterplan that this area is proposed to be used for 'Mansion Unit base temporary parking'.

The large area of hardstanding within such close proximity to the principal house would be clearly visible from the house and would be inappropriate to its immediate

setting. Improving views from inside the house, from the upper floor windows, out towards the landscape has been identified within the application as a benefit which would be achieved in the views looking east by excavating the area of hardstanding (to assumed historic levels) to minimise the visual impact, and through the management of trees to screen views of the car park from the principal house. The views from the house towards the wider landscape are just one aspect of how it is experienced (albeit an important aspect) and there are other views and aspects of its setting to consider which would be detrimentally impacted by the proposed hardstanding. The excavated land and screening would be visible from other aspects within close proximity to the heritage assets and the proposed mitigation measures would only lessen the impact from one aspect.

Whilst it is noted the land would be excavated to assumed historic levels, it is unlikely that the landscape would have presented as a large, flattened area of hardstanding for car parking. There are similar concerns for the landscape alterations to the south of the site; whilst setting the buildings into the landscape could minimise their perceived scale, the appearance of large, flat areas of hardstanding screened by dense planting would be incongruous within the site.

There are some concerns that the proposed tree planting would be excessive, particularly where it has been positioned to screen development. This results in denser areas of planting that does not correspond with designed, naturalistic tree planting seen on historic maps. Planting may also have an intrusive effect on the setting of the heritage assets.

Mitigation measures would only work to minimise the visual impact of the proposed development and do not remove the harm completely. The proposed development would also likely be emphasised during diurnal and seasonal changes and through the patterns of use when large vehicles are parked on the lots.

There would be no objection to the modern farm buildings, carparking to the north subject to details) and Children's Farm (whilst the information is limited, matters are reserved) The heritage benefits of the scheme and mitigation measures would be insufficient to outweigh the harm resulting from the proposed development. The proposals would fail to preserve the special interest of the listed and curtilage listed buildings that have been identified above, contrary to Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. With regards to the National Planning Policy Framework the level of harm is considered to be 'less than substantial' as per paragraph 202. Paragraph 199, 200 and 206 would be relevant.

1.1.4.3 Third set of comments received, dated 4 April 2024, providing detailed assessment of each element of the scheme and providing justification of level of identified less than substantial harm

This application is for a hybrid application for the creation of a Film Hub to include detailed approval for demolition of a number of existing buildings including children's farm buildings and change of use of Mansion House and Aisled Barn for filming and the construction of a cafe within the Walled Garden, new car parking area to north of site, alterations to existing access points along Langleybury Lane, change of use of the L Shaped Barn (to multi-purpose use including cycle hub, showers and vehicle storage) and change of use of ground floor of the existing Laundry to reception facility, together with outline planning approval (matters reserved: Scale, Layout, Appearance and Landscaping) for change of use of site to a Film Hub to include Craft Workshop buildings, Sound Stages, Support Workshops, Production Offices, Backlots, Film and Television Training Facility Building, Offices, Ancillary Buildings, parking areas and relocation of Langleybury Children's Farm including new farm

buildings. Alterations to existing cycle path and pedestrian network within the site, to include provision of a new pedestrian/cycle access within the site to the A41.

This is the third consultation response relating to this application. This letter should be read in conjunction with advice letters dating 09/03/2023 and 06/12/2023. In 2020, planning permission was granted for temporary change of use of the site and buildings to film studios (see application 20/1697/RSP). The proposed change of use and direct works to the listed buildings proposed as part of the full application are acceptable and advice has been provided under the accompanying Listed Building Consents. The indirect impacts of the proposal are considered within this advice letter, the indirect impacts are those that have an impact on the designated asset's setting. Setting contributes to the significance of the heritage assets.

Heritage assets outside of the application site:

Hunton Bridge Conservation Area

The northeast boundary of the application site bounds the southwest boundary of the Conservation Area. The Craft Zone development is separated from the Conservation Area by the Home Farm, Langleybury House and the mature trees within the Rockery; this would screen the development so the proposal would be unlikely to have a detrimental impact on the significance of the Conservation Area. Due to the east part of the Conservation Area being further removed by Watford Road, and set within a valley, the proposal would unlikely have any adverse impact within its setting.

Listed buildings

2 Church of St Paul (Grade II*, list entry: 1100890) is located to the north side of Langleybury Lane, northeast of Langleybury House. The significance of the asset would not be harmed by the proposed development due to existing landscape, intervening development and topography. Views looking north, from Langleybury House, towards the church would remain unchanged.

The following Grade II listed assets are also located in the wider surroundings of the site but would not be impacted by the proposal as their settings (from which the assets can be experienced) are not wide reaching into the site: St Paul's Lych Gate (list entry: 1173180); Langleybury War Memorial (list entry: 1436884); Loyd Memorial Cross (list entry: 1348206); and Mile Post south of A405 (list entry: 1348220)

Heritage assets within the application site:

Langleybury House (Grade II*, list entry: 1173157)

In statutory terms, the significance of Langleybury House is recognised by its designation as a Grade II* listed building which reflects its particular importance as a building of 'more than special interest', with only 5.8% of listed buildings being designated at Grade II*. 1 Langleybury House is an early eighteenth-century house with mid and late nineteenth century remodels, extensions, and alterations.

The principal significance of the listed building derives from its architectural and historic interest. Langleybury House is an important example of an early eighteenth-century country house. The building provides evidence of historic land use and ownership, as well as changes in fashion, and demonstrates an evolution of building techniques and materials. The building has a historic relationship with the rural landscape due to its function as the principal dwelling of a large country estate in the eighteenth, nineteenth and twentieth centuries. Furthermore, the existing house replaced an earlier building which also contributes to our understanding of the land use prior to the eighteenth century.

It is clear that the setting of the asset has been subject to change over time, some of which has had a detrimental effect on the setting of the listed building. The M25 has divorced the house from part of its former, wider estate and the former Langleybury Secondary School has introduced unsympathetic development within the parkland setting of the asset. Modern agricultural buildings have also been constructed which are not of architectural interest, however, they are utilitarian in character, reflecting the historic use of the site as a modern iteration of farm buildings and are not unexpected within a farmstead setting. Beyond the modern farm buildings and the former Langleybury Secondary School, a large amount of the undeveloped setting remains and still reflects the historic parkland setting as well as the rural countryside character.

The undeveloped, open parkland setting permits an understanding of Langleybury House's historic context as a large country house in a rural parkland setting, positively contributing to the asset's significance. The land between Langleybury Lane and the M25 is characterised by open fields and tree planting; this works to reduce the visual impact of the M25 by providing a buffer. Langleybury home farm buildings (including the designated assets of The Stables, Aisled Barn and Old Farm Cottages) and other curtilage listed assets such as the lodge buildings, Laundry, Walled Garden, workers' accommodation, are also an important part of the setting of Langleybury House, contributing 1 <https://historicengland.org.uk/advice/hpg/has/listed-buildings/> 3 to our understanding of how Langleybury House and the surrounding landscape functioned and developed for several centuries.

The existing use and character of the Site is found to make a positive contribution to the significance of the Langleybury House by permitting a continued appreciation of its architectural and historic interest as well as permitting an understanding of its historic context, despite the change in use and unsympathetic development.

The Education Building & The Craft Zone:

The education building would have a smaller footprint than the existing twentieth century school building and would reduce the amount of hardstanding in this location. However, it would still be an incongruous structure within the setting of the eighteenth-century country house by virtue of its scale, appearance and use.

Architecturally, it would be vastly different to Langleybury House and the historic buildings on site. The building would have large amounts of glazing divided by timber columns. The appearance would result in a building that would be visually pronounced due to its contrasting materials (and likely uncharacteristic reflective properties of the glazed elevations). The building would be an incongruous addition that would relate poorly to the scale, form and appearance of rural parkland setting of Langleybury House. Given the proximity of the education building to Langleybury House it is likely to be visible from Langleybury House and within views surrounding the house looking back towards it. Although no CGIs or visualisations demonstrate the visual relationship between the education building and Langleybury House, there are views from the wider parkland looking back towards Langleybury House and the education building. CGI Viewpoints 1 and 3 demonstrate the visual impact of the proposed Education Building and how dominant it would appear within the landscape. Due to the bulk, massing and appearance of the Education Building, with large amounts of glazing and timber columns (which give it a vertical emphasis), it would visually compete with Langleybury House. The removal of the former Langleybury Secondary School would be positive, but the Education Building would also be visually prominent within the landscape and would detract from Langleybury's primacy and ability to appreciate its architectural interest as the focal point of the parkland. Furthermore, when taking into consideration the extent of other development proposed, the reduction in footprint of built form and hardstanding in the

area of the former Langleybury Secondary School to the southeast, cannot outweigh the harm arising from the proposal.

Turning to the Craft Zone, the historic farmstead is of a notably subservient scale and appearance when compared to Langleybury House and the Stables which is indicative of the historic function and use. The proposed Craft Zone would introduce ten new structures within this part of the site. Nine of those structures would be of substantial scale within close proximity to the Grade II* listed asset, dominating the historic farm buildings and infilling the much of the undeveloped land between the farm buildings and Langleybury Lane. The substantial scale and appearance would be vastly different from the historic farm buildings and would be larger in footprint than the principal house. This would undoubtedly have a negative impact on the setting of Langleybury House by introducing typologically incongruous structures so close to the principal house and home farm, and by removing historically open space. Architecturally, the proposed buildings would be of an industrial scale and appearance, with a split pitch roof form with clerestory (a form typically associated with larger scale industrial buildings), the materials would have a very dark/ industrial appearance with dark grey zinc cladding, dark stained timber boarding, roller shutters and solar panels which would exacerbate their appearance in the landscape. They would have a deep, shallow pitched roof scape due to their large footprint. They would fail to relate to the traditional scale and proportions of the historic buildings 4 within the site. Building 12-01 would be of a more appropriate scale and appearance (seen in CGI Visualisation 6).

The Craft Zone, due to its extent and scale, would be visible upon the approach to Langleybury House from both access lanes to the west as well as from Langleybury Lane. The experience of the approach would change from an informal track, passing by the Lodges and home farm with a view of undeveloped farmland and parkland to a formalised approach with road markings and views of industrial scale buildings that would appear visually prominent and discordant within these views (see Viewpoint 1 of the Environmental Statement (ES), Appendix 6). This would alter the experience of Langleybury House and detract from our ability to appreciate the asset as a large country house set within a rural parkland setting. The proposed buildings would fundamentally alter the character of this part of this site by introducing buildings of an industrial scale and appearance, undermining the subservient context and traditional character of this part of the site. I acknowledge that there are modern farm buildings, but they are much smaller in quantity and scale, so they do not undermine the architectural and historic interest of the home farm buildings.

Heritage comments relating to the improved views from Langleybury House looking east towards the landscape have been addressed in the advice letter dating 06/12/2023.

I recommend that the temporary structures are omitted from the existing section drawings, these were only granted temporary permission under application 20/1697/RSP and will be removed once the temporary permission has lapsed. Therefore, they do not form a baseline from which this application is assessed.

Sound Stages and Backlot:

This part of the site currently comprises open undeveloped verdant land that slopes away from Langleybury House. Some of this area has been re-landscaped to accommodate school playing fields but remains verdant and open. The proposed development associated with the sound stages and backlot would be located partly outside of the land formerly associated within the estate, but this part of the site still forms an element of the asset's rural setting. The southern part of the site has

remained historically undeveloped, positively contributing to the significance of the asset by permitting an understanding of its rural, historic context.

The proposal would introduce four sound stages as well as several production offices with a maximum height of 18m. The buildings are of an industrial scale, massing and appearance. This would result in fundamental alteration to the land use and land character. The proposed buildings would be highly incongruous within the setting of the listed building. The proposed development would erode the rural landscape that surrounds Langleybury House and detract from our ability to appreciate the asset in its formerly wide-reaching rural setting. The backlot would be a large area of hardstanding, which would be used for temporary sets but there is limited detail of the appearance and scale of the temporary sets and the length of time they would be in place, so the full impact cannot be understood.

There is limited visibility from Langleybury House towards this part of the site, but it can be seen from some of the upper floor windows. Additionally, there are views from this part of the site back towards Langleybury House. Granted, the former Langleybury School Building is situated in front of the house and is visible within these views, but part of the house can still be seen. The soundstages and production offices would dominate this part of the site, particularly from the wider landscape and 5 Langleybury Lane. The buildings would block all views of Langleybury House from Langleybury Lane and would dominate the rural setting. The sound stages and backlot would be visible from other aspects within the rural and parkland setting of Langleybury House, which would detract from the experience of the asset in a rural parkland setting through the encroachment of unsympathetic development within the historically undeveloped landscape. The wider, rural landscape would be fundamentally altered through the proposed development (see Viewpoint 9 of the ES Appendix 6). The landscape would also be excavated to accommodate the sound stages and back lot, which would erode the naturalistic and rolling, parkland landscape which positively contributes to the setting of Langleybury House.

Stable Block (Grade II, list entry: 1100889)

The Stable Block is eighteenth-century in derivation, it has a nineteenth century clock turret, cupola and internal stalls and managers. The Stable block is contemporary with the principal house and faces it across an entrance court. The principal significance derives from its architectural and historic interest. Its setting also makes an important contribution to its significance, the north elevation faces onto Langleybury House, and the south elevation faces onto the Aisled Barn, Old Farm Cottages (both Grade II listed), with views of the home farm beyond. The northeast elevation is highly decorative in its architectural detailing which is indicative of the close functional relationship with Langleybury House and its higher status. The rear (southwest elevation) is simpler and utilitarian but of a scale that reflects its pre-eminence. The position, orientation, and architectural detailing is indicative of the direct function with both Langleybury House and the wider home farm; the asset's historic context remains appreciable today. Langleybury House and the Stable Block are visually related, positively contributing to our understanding of the historic functional relationship. The architectural detailing and proximity to Langleybury House attest to the primacy and higher status of the asset. The home farm structures are subordinate to both Langleybury House and the Stable Block by virtue of their ancillary scale and appearance, this ensures the Stable Block remains architecturally distinct from the other home farm buildings.

The former Langleybury Secondary School is located to the southeast of the asset and has eroded the former, rural and open landscape setting of the Stable Block and caused harm to its significance. The removal of this detracting element would be positive. There are no section drawings northeast-southwest through the site to show

the Stable Block in context with the proposed Craft Zone to illustrate how the Craft Zone would appear in the backdrop of the home farm, but due to the scale, extent and appearance of the proposed development associated with the Craft Zone and Education Building they would likely be visually prominent and dominant with the setting of the Stable Block.

Although the setting of the asset has been altered, the historic context can still be appreciated particularly due to the largely unchanged setting to the north, south and west. This setting to the south and west beyond the home farm would be all but removed by the proposed development; the historic farmstead and a small area of land would remain undeveloped, but this too would change in character. The proposed changes would include pedestrian routes and more managed planting (albeit naturalistic wildflower beds), but it would not reflect the historic context of the asset. For example, the land to the west was used as a paddock/ meadow in the mid-nineteenth century and has remained as an undeveloped field since.² This character would be removed, and the experience of the asset altered.

Due to the proximity of the proposed Craft Zone and Education building to the heritage asset, they would be visible in views looking east, west and south from the asset and back towards the asset, for example standing near the E-shaped barn looking northeast through the home farm towards to the Stable Block, these views would be flanked by large, industrial style buildings. The proposed buildings would be of an industrial scale and appearance and would be incongruous within the rural landscape and contrast with the traditional and utilitarian character of the home farm. The use of materials, such as the dark, modern cladding, large amounts of glazing, and solar panels, would be more prominent within the landscape and architecturally compete with the Stable Block. The proposed development would be more incongruous within the setting of the Stable Block than the existing former Langleybury Secondary School due to the greater extent of built form, inappropriate appearance and dominating scale. The proposal would diminish attributes that positively contribute to significance and detract from our ability to appreciate its architectural and historic interest.

Home Farm (including Aisled Barn (Grade II, list entry: 1348205); 1, 2 and 3 Old Farm Cottages (Grade II, list entry: 1296346); and Curtilage Listed Barns)

The Aisled barn is timber-framed barn of fifteenth or sixteenth origin with later eighteenth and nineteenth century alterations. The asset has architectural interest as a good surviving example of a fifteenth/ sixteenth century barn that has been adapted over time and historic interest due to its association with Langleybury Estate and interrelationship with other heritage assets within the home farm. The twentieth century turret would be removed as part of this proposal (accompanying Listed Building Consent: 22/2077/LBC) which is positive.

1, 2 and 3 Old Farm Cottages comprise a row of seventeenth century cottages that were re-fronted and extended in the eighteenth century from which their architectural interest derives. They were constructed to house the labourers of Langleybury Home Farm, attesting to their historic interest.

There are two other historic barns within the complex which are considered to be curtilage listed; the L-shaped Barn is a late nineteenth single storey range and the E-shaped Barn was constructed in 1903, originally built as cow sheds. The assets are of architectural interest through their nineteenth and early twentieth century fabric. As well as their scale, form and appearance which attest to their historic function and use. They have historic interest due to them being part of the Langleybury Home Farm, providing evidence of the changing agricultural practices at the estate and function of the wider landscape.

The historic setting of the home farm buildings, although no longer pastoral/agricultural in use, can still be appreciated today due to the largely undeveloped, open green space that surrounds them (particularly to the south and west). This arrangement of the historic farm also remains appreciable today. This positively contributes to their significance.

As a group of historic farm buildings, varying in age and type, they are representative of the historic use, function and evolution of Langleybury Estate and its home farm. They have a distinctive historic and utilitarian character that contrasts with the grandeur of Langleybury House and the associated Grade II listed Stable Block. The group of historic agricultural buildings provide visual interest in this context and visibly attest to the varying status, function and hierarchy of the buildings and spaces between Langleybury House, the Stables and the farmyard. Whilst no longer in their original use, they have retained their character and layout which positively contributes to the experience of the assets in their historic context, reinforcing an understanding and appreciation of their function and use.

The proposed development of the Craft Zone and Education Building would introduce new structures of an industrial scale and character, vastly different to the modest appearance and scale of the historic farm buildings. Resultingly, the proposed development would architecturally compete with and visually distract from the significance of the assets. This is due to their scale, massing, large footprints, use of large amounts of glazing, dark cladding and use of contrasting materials and incongruous features such as solar panels.

The proposed buildings would dominate this part of the site, and due to their positioning and layout would physically and visually isolate the assets from their historic setting, particularly the E-shaped barn which would be subsumed by the Craft Zone and divorced from the home farm. As farm buildings, the use and function of the buildings are intrinsically linked to the surrounding landscape; the home farm buildings and their setting are no longer in their historic use, despite this, their use and relationship to the surround land is still legible. The proposed development would sever the last link between the assets and their original setting. This would alter how the assets are experienced and appreciated. The remaining undeveloped land to the west and within the historic courtyard would also change due to the proposed landscape alterations including vehicle tracks, parking bays pedestrian pathways and wildflower planting in informal beds; all of which would be more formal and managed than the existing site.

There are no sections running east to west looking southwest or visualisations of the same aspect, so the full visual impact of the development within the backdrop of the asset cannot be appreciated. However, CGI viewpoints 3, 4, 5 and 6 demonstrate how jarring the Craft Zone and Education Building would be within the landscape and adjacent to the historic farm buildings.

Whilst the modern farm buildings are not sympathetic, they are not unexpected structures and reflect the historic use of the farmstead. The former Langleybury Secondary School building has negatively impacted the setting of the farm buildings by removing the historically undeveloped setting to the east. However, the proposed development would cause additional harm to the assets by introducing development of an even greater extent and scale to the east, west and south. This change cannot be considered to have a neutral or beneficial impact on the significance of the heritage assets. As the Craft Zone would surround the home farm and divide it from the wider site, the Sound Stages and Production Offices would have a limited visual impact but there would likely be wider environmental impacts from lighting and additional movement.

Other Curtilage Listed Structures:

Laundry Building and West Cottages

The Laundry Building is a single storey, late nineteenth building, and West Cottages are a pair of attached single storey farm cottages built in red brick. They are formed of two phases, mid to later nineteenth century and early to mid twentieth century. These assets are located immediately west of the Stable Block and southwest of Langleybury House. They have some architectural interest due to their surviving late-nineteenth century fabric and historic interest through their functional link with Langleybury House, and they are indicative of the evolution of Langleybury Estate in late nineteenth century. The proposed Craft Zone development would result in the fundamental alteration of land character to the south and southwest of these assets, the introduction of large industrial buildings within their rural and pastoral setting would detract from our ability to appreciate and experience the assets in their historic context.

Former Gardener's House

Former Gardener's House is a two-storey, late nineteenth century gardener's house in an Arts and Crafts style. The asset has some architectural interest through the survival of its late nineteenth century fabric and the design which relates to both national and local styles. Its historic interest derives from its association with Langleybury House and the wider estate, furthering our understanding of the development of the estate and land use in the late nineteenth century. The immediate setting of this asset would remain largely unchanged. There would be some views from the asset of the proposed Craft Zone due its scale and extent, which would fundamentally alter and erode the rural character of the site. The Former Gardener's House is surrounded by trees which partially screens the Walled Garden when viewed from the Former Gardener's House. There may be glimpsed views of the roof of the café building above the wall, but this would not have an adverse impact on the setting of the asset.

The Lodges

South Lodge is a late nineteenth century gate lodge house with modern extensions and alterations. The proposed development of the sound stages and backlot would surround the asset, divorcing it from its historic and intended setting. The gate lodge would no longer be experienced and appreciated as in isolated lodge building, positioned at a historic entrance signifying the entrance into the historic parkland. This would detract from our ability to appreciate and understand its historic relationship and function with the wider estate and parkland of Langleybury House.

West Lodge is also a late nineteenth century lodge building. The proposed development within the Craft Zone would remove a large part of the asset's historic and undeveloped setting which still remains appreciable today. The development would be prominent and incongruous in the backdrop of the asset affecting how it is experienced and appreciated as a former gate lodge, separated from the home farm and principal house by undeveloped fields.

Walled Garden

The Walled Garden is of nineteenth century derivation and it has architectural significance in its nineteenth century fabric, scale and appearance. The Walled Garden forms part of the wider Langleybury Estate ensemble and contributes to our understanding of how the estate functioned and evolved in the late nineteenth century. The setting of the asset is formed of the internal space which was formally used as a kitchen garden and the surrounding landscape through its historic

functional connection with Langleybury House which is still legible today (despite it no longer being in its original use).

As part of the proposal, the piecemeal modern structures associated with the Children's Farm would be demolished which is positive. It is also positive that the kitchen garden use would be reinstated as this would enhance our understanding and appreciation of its historic and intended use. It is proposed to construct a large café building which would abut the northeast and northwest wall and run perpendicular with the northwest wall. The proposed building due to its scale, form and appearance would be an incongruous addition within a nineteenth century walled garden. I acknowledge that it is not unexpected to have glass structures within a walled garden and there are small glass structures present on the late nineteenth century Ordnance Survey maps. However, these were significantly smaller in scale, and the proposed café building would have a large footprint with a double pile roof form, metal cladded roof, arched entrance, deep overhanging eaves, timber cladding all of which would not reflect a traditional, glass house of a nineteenth century walled garden. There is scope for some development within the Walled Garden, but I recommend it is more akin to a traditional glasshouse. The removal of the remnants of the boiler house and the stepped height of the wall would also result in the café building projecting above the height of the walled garden in the north-east corner; this is not objectionable but the detailing of this aspect is important. Amending the design of the door and roof to be more akin to a tradition glass house could lessen the visual impact and address concerns.

There are also wider environmental impacts to consider such as additional light spill, additional movement through traffic and noise, changes to general character, changes to building surroundings and introduction of large areas of hardstanding all of which would erode the rural and parkland setting to an even greater degree than the existing use and development. Additional planting is proposed throughout the site in attempt to mitigate the visual impact of the proposal. However, additional planting and screening cannot fully mitigate the impact of the proposal due to the extent of development and fundamental alteration to the landscape character. There are also aspects of the scheme that cannot be fully assessed at this point, for example the impact of the temporary sets and parking of large vehicles within the backlot, so it is not known what mitigation measures would be required. The proposed development would also likely be emphasised during diurnal and seasonal changes and through the patterns of use.

Harm and the level of harm to the designated heritage assets:

The following aspects of the scheme are considered positive: - Securing a use for the designated heritage assets;

- Repair/ restoration of the features of the Victorian formal garden;
- Improvements to the view from the mansion across the parkland to the east;
- Removal of the twentieth century school building; and
- Removal of modern agricultural buildings.

The Planning Practice Guidance (Paragraph: 020 Reference ID: 18a-020-20190723) states an example of heritage benefits may include 'sustaining or enhancing the significance of a heritage asset and the contribution of its setting'. The Historic Buildings Report submitted (October 2022 and May 2023) states that the proposal would establish a long-term beneficial use for the historic buildings.

The proposed use of Langleybury House would ensure that the house remains as a single entity. This would sustain the significance of the property's fabric to some degree as the house would remain as a complete unit in a single composition. It is certainly less invasive than other potential uses including conversion to multiple residential units; but this is not a proposal being considered and there are no details of such a proposal. However, during filming within Langleybury House (and other historic buildings) scenery flattage would be installed which could result in harm to the historic buildings by obscuring architectural features, effecting room proportions and changing the character of the interior. It is acknowledged that this harm would be temporary for the time that the scenery flattage is in place but these too have the potential to be installed on a long-term basis so the full impact of any set construction cannot be determined.

Furthermore, the proposed development within the setting of the heritage assets would neither sustain nor enhance their significance due to the extent, scale and typology of the proposed buildings and infrastructure. The proposed development would be intrusive within the setting of the heritage assets and detract from their significance. Resultingly, there would be limited heritage benefit arising from the use of the house and other historic buildings for filming. The significance of the heritage assets would be sustained to some degree and due to the limited permanent intervention to their fabric but there would still be harm from the temporary set building, and there would still be harm arising from the development within the setting of the heritage assets.

As outlined above, the proposed extent, scale and appearance of the development would significantly alter the setting of Langleybury House and other heritage assets. The proposal would have a detrimental impact on attributes that have been identified to positively contribute towards the significance of the assets. The aspects of the scheme that are positive are undermined by the harmful aspects of this scheme. This proposal would replace the existing, unsympathetic structures with a development of a vastly greater scale and extent. The proposed development would also be architecturally incongruous within the rural, pastoral and parkland setting of the heritage assets. The proposal would have an industrialising impact on the settings of the assets and detract from our ability to appreciate their architectural and historic interest. The proposal would be more harmful than the existing situation and would have a cumulative negative impact on the significance of the heritage assets.

I afford limited weight to the heritage benefits given the overall impact of the proposal. Taking this into consideration, the proposal would cause a low-to-mid level of 'less than substantial harm to the significance of Langleybury House, Stable Block, Aisled Barn, Old Farm Cottages and the curtilage listed structures (excluding the Walled Garden). Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and paragraph 208 of the NPPF should be considered. With regard to the Walled Garden, this is within a more isolated position within the site and the impact of the proposed café building is not wide reaching and is isolated to the Walled Garden. There is also a benefit arising from the reinstatement of the kitchen garden. For this reason, the level of harm to the curtilage listed structure would amount to the lowest level of 'less than substantial' harm to the asset's significance. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and paragraph 208 of the NPPF should be considered.

As per paragraph 205, when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). Furthermore, the proposed fails to make a positive contribution to local character and distinctiveness making paragraph 203c relevant.

1.1.5 Historic England: [Less than substantial harm]

1.1.5.1 **First set of comments received, dated 22 February 2023, objecting to the proposed development.**

Summary

Langleybury is a fine example of a Georgian country house with Victorian alterations consisting of a good-quality composition and a distinctive plan form.

The house is part of a wider estate of important ancillary buildings which are recognised nationally by their grade II designation. This includes the stable block, 'old farm cottages' and aisled barn which is thought to date from the 15/16th century. The house and estate buildings form a remarkable and highly important complex which is set in historic parkland.

The current planning application is a hybrid application for detailed approval and reserved matters. The detailed approval relates to change of use of the Langleybury House and ancillary buildings and the construction of a café in the walled garden. The reserved matters application relates to change of use of the site to a Film Hub to include craft workshop buildings, sound stages, support workshops, production offices, backlots, film and television training facility building, offices and ancillary buildings.

The proposed 'film hub' and buildings would result in a high level of less than substantial harm to the significance that the grade II* Langleybury House and other listed buildings at Langleybury House derive from their setting.

Historic England does not consider that clear and convincing justification in line with planning policy (NPPF, paragraph 202) has been provided to show that the proposals are required to secure the future of the site. While the heritage benefits would be positive in repairing the Langleybury House and other listed structures, restoring parts of the landscape and reinstating formal garden features, we do not consider they alone outweigh the harm that would result from the proposals. Nor is it clear that the proposals are required to deliver these or that alternative, less harmful ways of delivering them have been considered.

It is for your Council to consider the wider public benefits and weigh the harm against these. In doing so we would urge you to give very great weight to the conservation of this highly significant place.

Historic England has serious concerns regarding the amount and scale of proposed new buildings on the site. If the proposals are not amended to reduce scale of development considerably and further justification for the scale of the development is not forthcoming, please treat this as an objection.

Historic England Advice

Significance

Langleybury House is a Georgian country house built circa 1725-8 for Sir R. Raymond, Lord Chief Justice. It is built from red brick with stone dressings and a slate roofs. There is a stone cornice to 19th century balustraded parapet with urns.

The house was heavily altered and extended in the Victorian period firstly remodelled for W.J. Loyd circa 1860-70 and extended for E.H. Loyd, circa 1890.

At this time the mansion was re-orientated, a closed porch with pedimented doorcase added and a two storey late 19th century canted link replaced the earlier covered passage to the service wing. The link adds irregularity and intrigue.

Langleybury is a fine example of a Georgian country house with Victorian alterations consisting of a good-quality composition and a distinctive plan form.

The house's more than special architectural and historic interest is reflected in its grade II* listing.

The house is part of a wider estate of important ancillary buildings which are recognised nationally by their grade II designation. This includes the stable block, 'old farm cottages' and aisled barn thought to date from the 15/16th Century. Unusually the historic farmyard is located very closely the Langleybury House, situated directly the south-west. The house and estate buildings form a remarkable and highly important complex which is set in an historic parkland.

Like the Langleybury House itself the grounds are also a result of multiple phases of development. The land to the north and east of the mansion was originally imparked while the southern area was absorbed into a larger area of imparkment in the later 19th century. Some more recent buildings and landscaping relating to the site's use as a school in the 20th century have had a detrimental impact to the house and its setting. At this point the landscaping was largely left to grassland, relatively few trees, and several areas of hardstanding. Modern development outside the park has also changed the wider setting. However, the landscape still retains a rolling parkland character within the which the house is commandingly sited on a plateau overlooking the land to the south.

The Langleybury House is currently on the Historic England Heritage at Risk Register (HAR).

Impact of the proposals

The proposed new build elements to create the 'Film Hub' complex would result in less than substantial harm of a high level to the setting and significance of the mansion and other listed buildings.

Historic England has been involved in pre-application discussions regarding these proposals and proposals for repair of the Hall and other structures.

a) Proposals and context

The current application is hybrid for detailed approval for the demolition of a number of existing buildings including children's farm buildings and change of use of Langleybury House and Aisled Barn for filming and the construction of a cafe within the Walled Garden, new car parking area to north of site, alterations to existing access points along Langleybury Lane, change of use of the L Shaped Barn (to multi purpose use including cycle hub, showers and vehicle storage) and change of use of ground floor of the existing Laundry to reception facility.

Outline permission (matters reserved: Scale, Layout, Appearance and Landscaping) is sought for the change of use of site to a Film Hub to include Craft Workshop buildings, Sound Stages, Support Workshops, Production Offices, Backlots, Film and Television Training Facility Building, Offices, Ancillary Buildings, parking areas and relocation of Langleybury Children's Farm including new farm buildings. Alterations to existing cycle path and pedestrian network within the site, to include provision of a new pedestrian/cycle access within the site to the A4. While the plans are indicative from our pre-application discussions we understand the submitted proposals reflect the intentions for the site.

The proposals arise from a desire to create a film hub at the site, building on its current success as a filming location. The intention is to repair the Langleybury House and other listed and non listed structures within the ownership, restore some of the landscape and reinstate garden features.

b) Children's Farm

The children's farm is currently located in an ad-hoc manner along the garden walls. The proposals seek to re-locate this facility further north and link the car-park with the school and cricket club.

We welcome the removal of the detrimental ad-hoc farm buildings from the walled garden. The proposed location would work logistically due to the access to the school and the car park. The details of this element would be reserved so we do not have detailed comments to make at this stage. While we can see the merit of the proposed location, we have some concerns relating to the scale of the play equipment which should be low key and low scale as should any buildings proposed for this site.

c) Walled Garden

The proposals in this area include a café building, the restoration and recreation of historic walled garden walls and associated planting. As is set out above, we welcome the removal of the detrimental ad-hoc farm buildings and the restoration of the garden walls.

The proposed café building is quite substantial in scale and would sit above the garden walls. We acknowledge the double pitched roof would keep the roofline lower than a single pitch, but wonder if the height could be reduced further? The long structure contains a café at one end, further seating along half the width with half a seating area and then covered seating area at the other end. If the covered seating area was reduced, this would help to decrease the length and scale of the building.

The proposals show this structure would be timber clad with large areas of glass and a standing seam zinc roof. The design and materials would give the building an incongruous appearance making it overly prominent within the immediate setting of the Langleybury House.

d) Farm Buildings

The historic farmyard is located directly to the south-west of the mansion. The proposals for this area show demolition of some detrimental modern additions. Two new buildings would be added in this area.

The majority of the buildings in this location run on an axis with the Langleybury House with the exception of the return element of the 'L-shaped barn'. The proposed building labelled 12.02 would sit at 90° to this current axis and act as a bookend, creating a small courtyard with the aisled barn and L-shaped barn. This would go against the existing grain of development. The proposed modern scandi design style with flat roof, large areas of glazing and light coloured timbers would be incongruous with the traditional service buildings. This building would be particularly prominent in views from the main access. This would have a negative impact on the significance that the Langleybury House and the grade II farm buildings derive from their setting.

e) Craft Sheds

The proposed craft sheds would be in an area directly south west of the farmyard in the historic core of the estate. The Former Dairy (referred to as the 'E shaped barn'). It was built as an Edwardian addition on land which was imparked in the 19th century.

This element is part of the reserved matters application. We understand the layout on proposed drawings is indicative of the intentions for any further applications. The proposed craft sheds would surround the E-shaped barn and isolate it among a sea of modern development. This would cut it off from its former context as part of the farm complex and working estate, this would impair the legibility of the site, causing harm to the significance the Langleybury House and listed farm buildings derive from their setting.

The amount of new build in this area so close to the Langleybury House is dramatic and while the buildings proposed are single storey the amount and footprint of this proposed craft village is inappropriate in its context within the immediate setting of the Langleybury House.

If the proposed new build was drawn back into the site, perhaps by the removal of the range opposite the E-shaped barn and the removal of one or two buildings opposite that it could create a visual connection between the historic estate and the E shape barn. This would also help to reduce the numbers of units in this area.

f) Education Building

The application seeks to demolish the existing school buildings and construct a new building on the same site to a smaller footprint. The building is intended for educational use for the film sector, however the detail of what would be taught and who the end user would be is unclear.

The school is located to the immediate south of the Langleybury House. This building is part of the reserved matters application. The supporting information shows the current design approach as an ultra-modern design and radical form.

The existing school is large in scale and detracts from the setting of the Langleybury House. Any building/s that replace the school would need to be sensitively designed to minimise any impact to the significance the Langleybury House derives from its setting.

We have concerns regarding the indicative scale of the educational building.

Views from the main approach show this building looming in the background and views from within the parkland looking back towards the Langleybury House show the education building as the most prominent building. The building's siting on the top of the valley, on the same platform as the house, allows it additional prominence.

A proposal of this scale and design would have a considerable negative impact on the setting of the Langleybury House.

g) Sounds Sheds and development in the southern parkland

Although historic maps indicate that this is within part of the parkland created by the mid 1880's through the creation of Langleybury Lane and the land' enclosure, it still forms an important part of the experience of the landscape and the setting of the Langleybury House.

As with other proposals falling within the reserved matters application the proposed masterplan shows the intentions for the layout, amount and scale of the proposals in this area of the parkland.

The proposed scale and form of the development including all back plots and service roads would result in a large increase of built form in this part of the historic parkland altering the character of the soft landscape dramatically. The large scale and massing of the units would make them overly prominent and alien in the landscape. This would

result in harm to the setting of the Langleybury House.

In order to reduce this harm, development in this area needs to be substantially reduced in area to minimise the spread of built form into the historic setting of the building.

h) Backlot

This is the name given to the large area of hard standing behind the sound stages. This area would be used as ancillary storage area for the sound stages or as a space to set up large outdoor sets. The hard landscaping would be incongruous in the open soft landscape.

This area extends into the parkland and into key site lines from the Langleybury House and its historic core. While the intention is for this to be used on a temporary basis large sets that would be set up for considerable periods of time and potentially on a back to back basis would dramatically alter the parkland character and detract from the rural setting of Langleybury House.

i) General design

We have concerns regarding the general design approach.

We understand the desire to create buildings 'of their time' but in the context of the historic farm buildings we question whether buildings more traditional in form and material would be more appropriate.

We have concerns regarding the large areas of metal proposed on the larger buildings. While we understand this aspect of the proposal is outline, we feel important to raise concerns at this stage. Metal would be reflective and incongruous in the traditional parkland setting.

Legislation, Policy and Guidance

a) Legislation

Historic England's advice is provided in line with the statutory requirement placed on local planning authorities by the Planning (Listed Buildings and Conservation Areas) Act, 1990, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses (Section 16(2)).

b) National Planning Policy Framework (NPPF)

The overarching purpose of the planning system is to contribute to the achievement of sustainable development. This means the planning system has three overarching objectives, economic, social and environmental, which are interdependent and need to be pursued in mutually supportive ways, paragraphs 7 and 8.

Paragraph 197 encourages local planning authorities to take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness.

Paragraph 199 further advises that "when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to

less than substantial harm to its significance”.

Paragraph 200 states “Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.”

Paragraph 202 advises that “where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use”.

c) Guidance

Our advice reflects guidance in the good practice advice notes produced by Historic England on behalf of the Historic Environment Forum in GPA 2; Managing Significance in Decision- Taking in the Historic Environment, GPA 3; The Setting of Heritage Assets.

Historic England’s Position

A large amount of the proposals are matters reserved however we understand the submitted parameter plans are broadly of the scale intended for the site.

In our view the proposed new build elements to create the ‘Film Hub’ would result in less than substantial harm of a high level to the setting and significance of the grade II* listed mansion and other listed buildings.

This level of harm could be reduced if the amount of new development and its scale was reduced as indicated in our advice. This is particularly relevant for the proposed development in the southern part of the site (Sound Stages, Backlot and Support Workshops).

We understand these proposals are put forward to bring about the repair and long-term viability of the site. Historic England wants the house to have a secure future and, while we welcome the repair of the Langleybury House and associated buildings/ structures, we have serious concerns regarding the proposed level and scale of development associated with this use.

The supporting information does not demonstrate that the current proposals are the minimum necessary to support the site. We are therefore not yet convinced this level of development has been fully justified in accordance with paragraph 200 of the NPPF.

Your authority should also be satisfied that the proposed use would secure the long term future of this building at risk. Were the proposed use to cease, development of this scale would affect any other future use of the house. In addition, it is not clear how the long-term repair and maintenance of the house could be secured/ tied to these proposals and your authority might explore how this could be achieved.

National planning policy states that less than substantial harm should be weighed against the public benefits including securing an optimum viable use (paragraph 202).

It is for your Council to consider public benefits arising from this scheme and weigh the harm against these. In doing so we would urge you to give great weight to the conservation of this highly significant Langleybury House and its setting and be convinced that the harm is outweighed by wider public benefits which could not be similarly delivered in a less harmful way.

Historic England has serious concerns regarding the amount and scale of proposed new build on the site. In view of the significance of Langleybury House, the high level

of harm the proposed development would cause, together with the absence of a clear and convincing justification to show the proposals are required to secure the future of the site, if the proposals are not amended and a robust justification provided, please treat this as an objection.

Recommendation

Historic England objects to the application on heritage grounds.

We consider that the application does not meet the requirements of the NPPF, in particular paragraph numbers 197, 199, 200 and 202. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of these paragraphs of the NPPF.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If, however, you propose to determine the application in its current form, please treat this as a letter of objection, inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

1.1.5.2 Comments, dated 8 September 2023, received following the amendments to the scheme where their objection was removed and High to moderate level of less than substantial harm identified]

Thank you for your letter of 9 August 2023 regarding further information on the above application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application.

Summary

Langleybury is a fine example of a Georgian country house with Victorian alterations consisting of a good-quality composition and a distinctive plan form.

The house is part of a wider estate of important ancillary buildings which are recognised nationally by their grade II designation.

Historic England have been asked to provide advice on amended proposals for this hybrid application.

The amendments to the whole scheme and reduction of development in the south of the parkland has reduced the level of harm to the significance that Langleybury derives from its setting. Nonetheless, we consider this would result in a moderate to high level of less than substantial harm to the significance of the grade II* listed mansion and other listed buildings. This is due to the scale and incongruous nature of the sound sheds and support facilities. We consider this harm would be considerably further reduced if the most northern sound shed was removed from the scheme.

We understand these proposals are put forward to bring about the repair and long-term viability of the site. Historic England wants the house to have a secure future and we welcome the repair of the mansion house and associated buildings/structures, especially as the mansion house is on our HAR register.

Taking into account the reduction in the level of harm, the heritage benefits of repairing the mansion and historic garden features, we would not object to these

proposals. It is for your authority to weigh the harm against the public benefits at this point.

Historic England Advice

Significance

Langleybury House is a Georgian country house built circa 1725-8 for Sir R. Raymond, Lord Chief Justice. It is built from red brick with stone dressings and a slate roofs. There is a stone cornice to 19th century balustraded parapet with urns.

The house was heavily altered and extended in the Victorian period firstly remodelled for W.J. Loyd circa 1860-70 and extended for E.H. Loyd, circa 1890.

At this time the mansion was re-orientated, a closed porch with pedimented doorcase added and a two storey late 19th century canted link replaced the earlier covered passage to the service wing. The link adds irregularity and intrigue.

Langleybury is a fine example of a Georgian country house with Victorian alterations consisting of a good-quality composition and a distinctive plan form.

The house's more than special architectural and historic interest is reflected in its grade II* listing.

The house is part of a wider estate of important ancillary buildings which are recognised nationally by their grade II designation. This includes the stable block, 'old farm cottages' and aisled barn thought to date from the 15/16th Century. Unusually the historic farmyard is located very closely the mansion house, situated directly the south-west. The house and estate buildings form a remarkable and highly important complex which is set in an historic parkland.

Like the mansion house itself the grounds are also a result of multiple phases of development. The land to the north and east of the mansion was originally imparked while the southern area was absorbed into a larger area of imparkment in the later 19th century. Some more recent buildings and landscaping relating to the site's use as a school in the 20th century have had a detrimental impact to the house and its setting. At this point the landscaping was largely left to grassland, relatively few trees, and several areas of hardstanding. Modern development outside the park has also changed the wider setting. However, the landscape still retains a rolling parkland character within the which the house is commandingly sited on a plateau overlooking the land to the south.

The Mansion house is currently on the Historic England Heritage at Risk Register (HAR).

Impact of the proposals

Historic England provided advice on this application in our letter dated 22 February 2023. We have now been consulted on an amended proposals which we will discuss below.

a) Walled Garden

In our previous comments we expressed concerns regarding the scale, height and roofline of the Café building.

The amended proposals show a building which has been reduced in scale by 50%. The height of the building has been reduced to sit below the garden walls and the roofline has been amended to only cover the built form. This would better respect the historic garden wall.

These amendments would reduce the building's impact notably. While we still consider the design would give the building an incongruous appearance its reduced scale would help it sit within its context and not be overly prominent within the immediate setting of the mansion house.

b) Farm Buildings

We welcome the omission of building labelled 12.02 in the previous iteration.

The amended proposals also show a change in the design style from scandi to a more agricultural appearance. We consider this would be more appropriate in this context.

c) Craft Sheds

The proposed craft sheds would be in an area directly south west of the farmyard in the historic core of the estate. The Former Dairy (referred to as the 'E shaped barn'). It was built as an Edwardian addition on land which was imparked in the 19th Century.

This element is part of the reserved matters application. We expressed concerns with the original application regarding the proposed layout of development and the treatment of the Former Dairy.

Our main concern was that the proposed craft sheds would surround the dairy and isolate it among a sea of modern development cutting it off from its former context as part of the farm complex and working estate.

The layout has been amended to create an opening in the development and provide a green courtyard. This would allow visibility between the dairy and former farm complex allowing some legibility of their former relationship and context.

We consider the proposed development would still erode their relationship and the proposed height of the craft sheds would overpower the dairy's prominence. However, we acknowledge the amended proposals have come some way in reducing the resultant impact to this element of the estate and the mansion's setting.

d) Education Building

The existing school is located to the immediate south of the mansion house. We welcome the removal of this building which has a considerable negative impact on the mansion's setting.

The original proposals included a large new education building on the site of the existing school. We advised that the proposed building's scale, design and siting on the top of the valley would make it overly prominent in the mansion's setting which would detract from the mansion's prominence within its parkland.

The amended proposals show a building which has been reduced in height, the massing broken down and stepped back from the ridge to reduce the building's visibility and prominence.

This building is part of the reserved matters application so we will not comment on the detailed design.

Subject to the detailed design we consider the currently proposed building's impact and resultant harm to the setting of the mansion house has been notably reduced.

e) Sounds Sheds and development in the southern parkland

As with other proposals falling within the reserved matters application the proposed masterplan shows the intentions for the layout, amount and scale of the proposals in

this area of the parkland.

We expressed serious concerns regarding this element of the proposals in our previous advice. This aspect of the proposals have been subject to detailed discussions with the applicants in the interim.

As a result the green space which acts as a 'buffer' between the historic core and the wider parkland has been increased. The proposed development has been amended as follows;

In the northern section the height of the sounds sheds has been reduced to 25000ft high. Four sounds sheds have been reduced to two and 15 support structures have been reduced to nine.

It was agreed that the southern part of this element is less sensitive given its later addition to the parkland, proximity to the motorway and distance from the mansion.

In the southern element the 10 support structures have been reduced to 4 larger ones.

We acknowledge the efforts of the applicants in reducing the built form in this area. Consequently, the level of impact and resultant harm has been reduced. It is still important to recognise that buildings of this nature would be incongruous and alien in a historic landscape and would cause harm to the significance the mansion derives from its setting.

f) Backlot

This is the name given to the large area of hard standing behind the sound stages. This area would be used as an ancillary storage area for the sound stages or as a space to set up large outdoor sets. The hard landscaping would be incongruous in the open soft landscape.

This area remains similar to the original application and so the impacts and our concerns remain the same. We understand this is key to the proposed business use.

Legislation, Policy and Guidance

a) Legislation

Historic England's advice is provided in line with the statutory requirement placed on local planning authorities by the Planning (Listed Buildings and Conservation Areas) Act, 1990, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses (Section 16(2)).

b) National Planning Policy Framework (NPPF)

The overarching purpose of the planning system is to contribute to the achievement of sustainable development. This means the planning system has three overarching objectives, economic, social and environmental, which are interdependent and need to be pursued in mutually supportive ways, paragraphs 7 and 8.

Paragraph 197 encourages local planning authorities to take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness.

Paragraph 199 further advises that "when considering the impact of a proposed

development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to less than substantial harm to its significance”.

Paragraph 200 states “Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.”

Paragraph 202 advises that “where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use”.

c) Guidance

Our advice reflects guidance in the good practice advice notes produced by Historic England on behalf of the Historic Environment Forum in GPA 2; Managing Significance in Decision- Taking in the Historic Environment, GPA 3; The Setting of Heritage Assets.

Historic England's Position

In our view the proposed amended scheme has reduced the level of impact within the immediate vicinity of the mansion house. This includes the farmstead area.

The amendments to the whole scheme and reduction of development in the south of the parkland has reduced the level of harm to the significance that Langleybury derives from its setting. Nonetheless, we consider this would result in a moderate to high level of less than substantial harm to the significance of the grade II* listed mansion and other listed buildings. This is due to the scale and incongruous nature of the sound sheds and support facilities. We consider this harm would be considerably further reduced if the most northern sound shed was removed from the scheme.

We understand these proposals are put forward to bring about the repair and long-term viability of the site. Historic England wants the house to have a secure future and we welcome the repair of the mansion house and associated buildings/ structures, especially as the mansion house is on our HAR register.

Taking into account the reduction in the level of harm, the heritage benefits of repairing the mansion and historic garden features, we would not object to these proposals. It is for your authority to weigh the harm against the public benefits at this point.

It is important to consider the optimum viable use for the site and be convinced that the harm is outweighed by wider public benefits which could not be similarly delivered in a less harmful way as outlined in the NPPF (paragraph 202). We understand that an alternative use which could result in less harmful development within the park is quite likely to result in more intensive use of the mansion which could result in harm. However, due to the scale of development put forward with this use we recommend that your authority should be satisfied the proposed film use is the optimum viable use for the site and that the fourth sound shed is necessary to secure this.

Paragraph 200 of the NPPF requires clear and convincing justification for harmful proposals, we therefore will ask that the LPA thoroughly assess whether this is the minimum level of development to secure this business use.

If your authority are minded to grant consent we will ask them to ensure the repair of

the Mansion House and landscape are secured in this permission in a timely manner. This could be linked to different aspects of the proposals or the business operation.

Recommendation

Historic England has concerns regarding the application on heritage grounds.

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 197, 199, 200 and 202 of the NPPF.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

- 1.1.6 Victorian Society: No comments received.
- 1.1.7 National Amenity: No comments received.
- 1.1.8 Dacorum Borough Council: [No objection]

Thank you for consulting with Dacorum Borough Council (DBC) in relation to the above scheme for the creation of a film hub at Land East of Langleybury Lane and including Langleybury House Estate.

These comments are provided on behalf of the Council by a Lead Officer within the Development Management team and should be construed accordingly.

We would acknowledge the desire to see this land redeveloped for appropriate purposes as set out through the creation of a development brief for the site and note that the proposals have been subject to positive pre-application discussions. We do not wish to raise any objections per se to the development of the site, however we would ask you to consider whether public access and associated improvement works to the site (footpaths, habitat creation) could be undertaken with a view to providing Suitable Alternative Natural Green Space (SANG).

As you may appreciate, consultants working for DBC have recently identified that recreational pressure was causing substantial harm to the Chilterns Beechwoods Special Area of Conservation and Natural England therefore indicated that we should be subject to a moratorium on new residential development pending the formulation of a mitigation strategy.

The mitigation strategy has been approved as set out in the following document:

<https://democracy.dacorum.gov.uk/documents/s36836/Appendix%20A%20-20Draft%20Mitigation%20Strategy%202.pdf>

Whilst DBC are currently seeking to provide SANG solutions through the development of land within our ownership, the capacity of these sites is finite and is unlikely to sustain the level of housing growth anticipated in the Borough. This site may be able to assist in providing additional SANG capacity for Kings Langley and settlements in the south east of the borough subject to meeting the requirements in paragraphs 3.5.10, 3.5.17, 3.5.18 and Table 4 of this mitigation strategy.

We would ask that SANG is provided at this site if possible and would welcome further discussions on this matter.

Comments on the amended scheme

Thank you for consulting Dacorum Borough Council regarding amendments to the scheme.

The amendments are welcome and result a reduction in harm to both the Green Belt and historic setting of Langleybury House.

I note the improved public access in the site including the provision of access to the Rookery Woodland. The improvements undertaken may meet the minimum requirements for the site to be identified as SANG and I would encourage the development of this site as a SANG solution in respect of the Chilterns Beechwoods SAC and to addressing blockages to the delivery of housing within Dacorum. We would be grateful if you could discuss such proposals with the applicants and Natural England in consultation with our SAC team (Sac@dacorum.gov.uk)

1.1.9 Watford Borough Council: No comments received.

1.1.10 Environment Agency: [No objection] - EA confirmed on 15 August 2023 that they have no objection to the amended proposal and eight conditions previously requested are still applicable.

Thank you for consulting us on the above application which we received on 10 November.

As part of the consultation we have reviewed the documents submitted in line with our remit. Including the following specific documents:

Phase 1 Desk Study, No. 001, Rev. V2.0, dated October 2022, prepared by Wardell Armstrong LLP

Environment Agency Position

Based on a review of the submitted information we have no objections subject to the inclusion of the below Landscape and ecological management plan condition and 7 Groundwater and Contaminated Land conditions.

Biodiversity

The ecological enhancements that have been proposed including the proposed restoration of historic ponds, management of wet woodland and grazing marsh will require a management plan to be in place to ensure the landscape provides a maximum benefit to people and the environment and ensures their ongoing biodiversity value is not lost.

In light of the above, the proposed development will only be acceptable if a planning condition requiring a landscape management scheme is included.

This approach is supported by paragraphs 170 and 175 of the National Planning Policy Framework (NPPF) which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused. Without this condition we would object to the proposal because it cannot be guaranteed that the development will not result in significant harm to the existing wet woodland and grazing marsh.

Condition 1

Landscape and ecological management plan

No development shall take place until a landscape and ecological management plan, including long-term design objectives, management responsibilities and maintenance schedules for all landscaped areas (except privately owned domestic gardens), shall be submitted to, and approved in writing by, the local planning authority. The landscape and ecological management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the local planning authority.

The scheme shall include the following elements:

- details of maintenance regimes for the ponds, wet woodland and grazing marsh
- details of any new habitat created on site including the dimensions, depths of the ponds and proposed planting schemes for all habitats.
- details demonstrating how the buffer zone will be protected during development and managed over the longer term including adequate financial provision and named body responsible for management plus production of detailed management plan for the River Gade and the on-site tributary
- details of management responsibilities for the habitats across the wider site
- details of the proposed structure of the inlet to the River Gade including dimensions, materials and proposed management regime
- details of any proposed footpaths, fencing and lighting, ensuring that the river corridor remains a dark ecological corridor (light below 2 lux)

Reason(s) 1

To ensure the protection of wildlife and supporting habitat. Also, to secure opportunities for enhancing the site's nature conservation value in line with national planning policy and adopted policy DM6: Biodiversity, Trees, Woodland and Landscaping of the Three Rivers Local Plan.

Groundwater and Contaminated Land

The previous uses of the development site present a risk of contamination that could be mobilised during construction to pollute controlled waters. Controlled waters are particularly sensitive in this location because the site is located:

- within source protection zones 1 and 2
- upon a principal aquifer and secondary aquifers

The application demonstrates that it will be possible to manage the risks posed to controlled waters by this development. Further detailed information will be required before built development is undertaken. We believe that it would place an unreasonable burden on the developer to ask for more detailed information prior to the granting of planning permission but respect that this is a decision for the local planning authority.

Without these conditions we would object to the proposal in line with paragraph 174 of the National Planning Policy Framework because it cannot be guaranteed that the development will not be put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution.

Condition 2

Universal condition for development on land affected by contamination No development approved by this planning permission shall commence until a remediation strategy to deal with the risks associated with contamination of the site in respect of the development hereby permitted, has been submitted to, and approved in writing by, the local planning authority. This strategy will include the following components:

1. A preliminary risk assessment which has identified:

- all previous uses
- potential contaminants associated with those uses
- a conceptual model of the site indicating sources, pathways and receptors
- potentially unacceptable risks arising from contamination at the site

2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off-site.

3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the written consent of the local planning authority. The scheme shall be implemented as approved.

Reason 2

To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by unacceptable levels of water pollution in line with paragraph 174 of the National Planning Policy Framework.

Note 2

The following report was submitted as part of the Environmental Statement: Phase 1 Desk Study, No. 001, Rev. V2.0, dated October 2022, prepared by Wardell Armstrong LLP. This information is sufficient to discharge part 1 of the above condition.

Condition 3

Verification report

Prior to any part of the permitted development being brought into use, a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and approved in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

Reason 3

To ensure that the site does not pose any further risk to the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete. This is in line with paragraph 174 of the National Planning Policy Framework.

Condition 4

Long-term monitoring

The development hereby permitted shall not commence until a monitoring and maintenance plan in respect of contamination, including a timetable of monitoring and submission of reports to the local planning authority, has been submitted to, and approved in writing by, the local planning authority. Reports as specified in the approved plan, including details of any necessary contingency action arising from the monitoring, shall be submitted to, and approved in writing by, the local planning authority.

Reason 4

To ensure that the site does not pose any further risk to the water environment by managing any ongoing contamination issues and completing all necessary long-term remediation measures. This is in line with paragraph 174 of the National Planning Policy Framework.

Condition 5

Previously Unidentified Contamination

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by, the local planning authority. The remediation strategy shall be implemented as approved.

Reason 5

To ensure that the development does not contribute to and is not put at unacceptable risk from or adversely affected by unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with paragraph 174 of the National Planning Policy Framework.

Condition 6

SuDS Infiltration of surface water into ground

No drainage systems for the infiltration of surface water to the ground are permitted other than with the written consent of the local planning authority. Any proposals for such systems must be supported by an assessment of the risks to controlled waters.

The development shall be carried out in accordance with the approved details.

Reason 6

To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by unacceptable levels of water pollution caused by mobilised contaminants. This is in line with paragraph 174 of the National Planning Policy Framework.

Condition 7

Piling/boreholes/tunnel shafts/ground source heating and cooling systems– lack of information – details to be agreed Piling/ other foundation designs using penetrative methods shall not be carried out other than with the written consent of the local planning authority. The development shall be carried out in accordance with the approved details.

Reason 7

To ensure that the proposed development does not harm groundwater resources in line with paragraph 174 of the National Planning Policy Framework.

Condition 8

Decommission of investigative boreholes

A scheme for managing any borehole installed for the investigation of soils, groundwater or geotechnical purposes shall be submitted to and approved in writing by the local planning authority. The scheme shall provide details of how redundant boreholes are to be decommissioned and how any boreholes that need to be retained, post-development, for monitoring purposes will be secured, protected and inspected.

The scheme as approved shall be implemented prior to the occupation of any part of the permitted development.

Reason 8

To ensure that redundant boreholes are safe and secure, and do not cause groundwater pollution or loss of water supplies in line with paragraph 174 of the National Planning Policy Framework.

Informative

Land contamination: risk management and good practice

We recommend that developers should:

- Follow the risk management framework provided in Land Contamination: Risk Management, when dealing with land affected by contamination
- Refer to our Guiding principles for land contamination for the type of information that we require in order to assess risks to controlled waters from the site - the local authority can advise on risk to other receptors, such as human health

Consider using the National Quality Mark Scheme for Land Contamination Management which involves the use of competent persons to ensure that land contamination risks are appropriately managed

- Refer to the contaminated land pages on gov.uk for more information

Flood Risk Activity Permit

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert, or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activitiesenvironmental-permits> or contact our National Customer Contact Centre on 03702 422 549 or by emailing enquiries@environment-agency.gov.uk. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Advice to applicant

Water Resources

Increased water efficiency for all new developments potentially enables more growth with the same water resources. Developers can highlight positive corporate social responsibility messages and the use of technology to help sell their homes. For the homeowner lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments.

We recommend that all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.

We also recommend you contact your local planning authority for more information.

Final comments

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.

1.1.11 Canal and River Trust: [No objection]

The Canal and River Trust have confirmed that the amendments to the scheme do not appear to affect our previous comments dated 9th December 2022 information and our substantive response (as required by the Town & Country Planning (Development Management Procedure) (England) Order 2015 (as amended)) remains to advise that suitably worded conditions are necessary to address the above matters and we request that the Council continue to have regard to our earlier comments]

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a statutory consultee in the Development Management process.

The main issues relevant to the Trust as statutory consultee on this application are:

- a) The impact on the character and appearance of the waterway corridor.
- b) The impact on the biodiversity and water quality of the canal.
- c) Energy Efficiency

Based on the information available our substantive response (as required by the Town & Country Planning (Development Management Procedure) (England) Order 2015 (as amended)) is to advise that suitably worded conditions are necessary to address these matters. Our advice and comments follow:

The impact on the character and appearance of the waterway corridor.

The site lies to the west of the Grand Union canal which to the north-east of the site passes through the Hunton Bridge conservation area. The Masterplan provided indicates that the built form proposed would be set back substantially from the canal and is therefore likely to have minimal impact on the waterway corridor. The desire to maintain the majority of the open parkland and to supplement the existing trees is welcomed as this would aid in maintaining the current bucolic feel of the waterway in this location.

The majority of the wider site is separated from the canal by a main road and builder's yard, with only the southern third of the site having a direct connection to the canal corridor. Overall the proposals appear appropriate with access to existing footpaths being maintained and views from the canal would be sufficiently screened by the 'Parkland' area.

The submission indicates that access points are proposed to the towpath and full details on these, any necessary improvements/mitigation measures to the access points and provision of wayfinding signage should be provided to assist with the additional usage that the towpath will experience and to ensure that the Councils aspirations for improving walking and cycling are met. It should also be ensured that any landscaping close to the canal is of native species, appropriate to this waterside location, and has regard for any potential impacts on the stability of the canal. The future maintenance and management regimes and responsibilities for the open spaces should also be provided for consideration. These matters could be addressed by the submission of reserved matters and conditions on any outline approval. The Trust wish to be consulted on this information when available.

There is reference to the potential for new moorings on the canal though no further details have been provided, such as what type of moorings, works involved in their provision, assessment of impact on navigational safety/biodiversity, future maintenance /management requirements etc. Any proposals for moorings would require the separate agreement of the Trust and until such time that this detail is provided, to the satisfaction of the Trust, and relevant agreements/ consents are in place, the Trust cannot guarantee these works could be undertaken. Further discussions will be needed with the Trust's Business Boating Team and the applicant/developer is advised to review our Business Boating Online Moorings Process and discuss this with them. The applicant /developer is also advised that any access or connection to the towpath would also be subject to a separate commercial agreement with the Trust.

The impact on the biodiversity and water quality of the canal.

The waterways have a rich biodiversity, with many areas benefiting from SSSI, SAC, SLINC or CWS designations.

Developments can have an adverse impact on the ecology of the waterways. The drainage methods of new developments in particular can have significant impacts on the structural integrity, water quality and the biodiversity of waterways. It is important to ensure that no contaminants enter the canal from surface water drainage.

Potential contamination of the waterway and ground water from wind blow, seepage or spillage at the site should be avoided and details of pollution prevention measures

should be provided. Works should also be carried out at appropriate times to avoid adverse impacts to nesting birds / bats etc. This could be addressed by the imposition of a condition requiring the submission of a Construction and Environmental Management Plan.

The proposals indicate the restoration of wetlands and a historic inlet with discharge to the River Gade. These works would be close to the canal and any discharge would ultimately flow to the canal. It is therefore important to ensure that there is no contamination of the waterway during construction or operation of the site. The full details on the restoration of the wetlands and inlet should be provided and supported by appropriate ground investigations and remediation measures. This matter could be addressed by condition and the Trust wish to be consulted on this detail when available.

1.1.12 Hertfordshire County Council: Highways Authority [No Objection]

1.1.12.1 **Comments dated, 26 January 2023, recommending refusal:**

Recommendation

Notice is given under article 22 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 that Hertfordshire County Council as Highway Authority recommends that permission be refused for the following reasons:

REASONS AND COMMENTS

The proposals are not currently compliant with Policies 1 (The Transport User Hierarchy) and 5 (Development Management) and fail to maximise access by sustainable means. There is insufficient information on the number of person trips numbers to allow the council to gauge the impact of this development upon the sustainable transport network. Furthermore, the suitability of the base traffic models have not been compared to the base level of queuing in order to demonstrate their validity for use in further assessment.

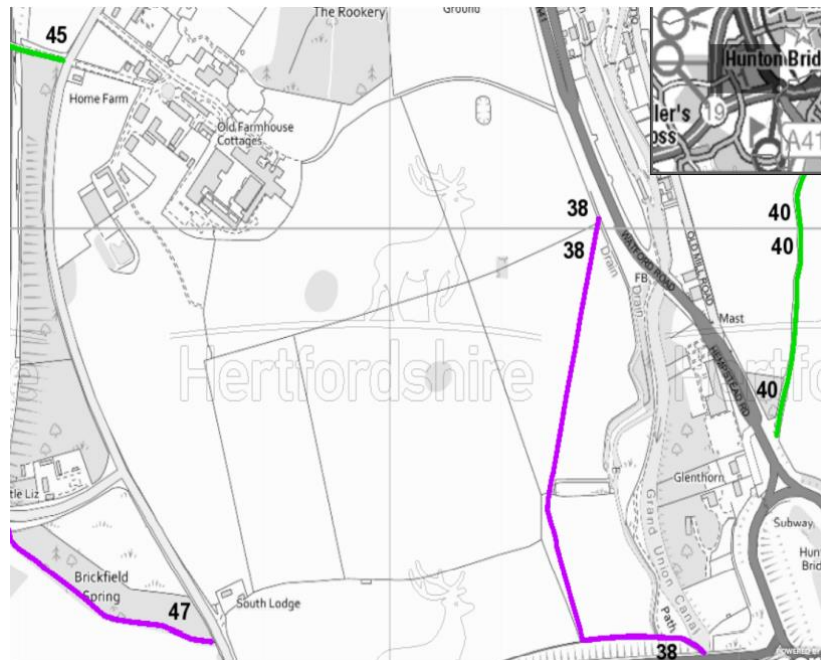
The existing Langleybury Estate (film hub and Children's farm) is located circa 6-7km cycle northwest of Watford's town centre and rail station. In addition to access to the national rail network the rail station also provides access to the London Over and Underground networks. The estate is bound to the south by the A41 spur road to Junction 19 of the M25 (dual carriageway); to the east by the River Gade and a single carriageway section of the A41 which bridges over the river; to the Northeast by the St Pauls CoE primary school; and to the north and west by the single carriageway Langleybury Lane. The film hub/ House and Children's Farm are located towards the north west of the estate. The A41 currently provides a barrier to the site for direct pedestrian/cycle access from the residential area of Abbots Langley (circa 1-4km east of the site).

The estate currently has two formal motorised vehicle accesses from Langleybury Lane, one directly opposite Langleybury Fields (farm access track and PROW 45) which serves the existing house/film hub; and a second access circa 30m north which serves the Children's Farm. There is also a third motor vehicle access onto Langleybury Lane for an individual residential property (South Lodge) and the southern field of the estate. A fourth and narrow (circa 3m wide) gated access to the northern fields of the estate forms the western arm of the mini roundabout which serves as the motor vehicle access to the St Paul's CoE primary school. The northeastern arm of the roundabout forms a priority 'T' junction with Langleybury Lane. circa 80m north east Proposals are to expand the Film Hub and relocate the Children's Farm north within the estate towards the St Paul's CoE Primary school access.

It is proposed that the former Children's Farm access is upgraded to facilitate two way working and HGV access and becomes the principal motor vehicle access to the Film Hub. Whilst the former main road access, which would be similarly upgraded, becomes a secondary vehicle road access. The third and less formal to the estate is to be upgraded into a formalised access that can also support two way traffic and HGV's. HCC would recommend that the number of access junctions into the expanded film hub are rationalised.

As mentioned previously the Children's Farm within the Langleybury Estate is being relocated towards the St Paul's CoE primary school. The relocated Children's Farm and a 50 space car park will be accessed from the eastern arm of the St Paul's CoE primary school access roundabout. The car park is being built to accommodate car parking for the school which is currently uncontrolled and problematic.

The public footpath PROW ABBOTS LANGLEY 038 currently traverses the south eastern area of the site.



Proposals would upgrade the PROW and extend it to Langleybury House and footpath connection made to the River Gade (Grand Union Canal) tow path towards the existing PROW's northern end. A further shared foot/cycle route will connect Langleybury House and the footway on the western side of the A41. Whilst this network of foot/cycleways is fine for recreational walks by staff, it is considered it is inadequate in terms of ensuring compliance with Policies 1 (The Transport User Hierarchy) and Policy 5 (Development Management) with regards to ensuring a safe and direct sustainable access to the site from along desire lines. As previously discussed the A41 currently obstructs the desire line from Abbots Langley. HCC Highways advised the applicant to look at providing a pedestrian/ cycle crossing across the single carriageway 40mph section of the A41 in the vicinity of the pedestrian/cycle access to the site to ensure that the development would be LTP4 compliant.



The developers transport consultant responded:

- 3.41 The future pedestrian / cycleway access will be provided onto the A41, however a crossing could be provided so that pedestrians/cyclists can tie into the existing footway network on the eastern side of the A41 due to the lack of footways along the western side. An image of where the crossing would be located is shown in **Photo 3.7** below. Vehicles may be travelling at fairly high speeds and therefore it is envisaged that the crossing would comprise a pedestrian island as a traffic signal crossing is not deemed appropriate.



Photo 3.7 – A41 Adjacent to Future Pedestrian/Cycleway Entrance

Further to this the HCC Road Safety team has been consulted and it is considered that a crossing could and should be provided. This is a 40mph section of road and is subject to 40mph for circa 600m on approach to a potential pedestrian crossing from the south. From the north the southbound approach reduces from a national speed limit dual carriageway to a 40mph single carriageway circa 70-90m in advance of a potential crossing. The short section of dual carriageway is interrupted by a signalised junction with Langleybury Lane/ Bridge Road circa 300m north of a potential crossing.

The junction is also subject to some congestion and the transport modelling presented in the supporting Transport Assessment (TA) corroborates this. It is not considered that traffic speeds in this location would be prohibitive to a pedestrian/cycle crossing. Furthermore, the recently HCC Highways DM approved Warner Bros expansion (22/0491/FUL) will install a pedestrian crossing circa 500m south of the potential crossing.

Road Safety (Personal Injury Accident (PIA) Analysis)

HCC Highways have reviewed the Personal Injury Accident (PIA) analysis within the TA and whilst there was a serious accident in the vicinity of the existing road access to Langleybury house this and other accidents within the last 5 years have been reviewed and the councils accepts the finding reported in the TA that these events are not consistent in the type of accidents, nor are they consolidated to any singular point, with the majority recorded to be as a result of driver or individual error. Hence there is no underlying road safety issues apparent in the vicinity of the site that would be exasperated by the proposals.

Trip Generation/ Attraction

Whilst HCC would have preferred a Multi Modal and Person Trip Based analysis HCC Highways DM has reviewed the traffic generation/ attraction presented within the TA and accept the rate/ traffic trip numbers presented.

Modal Split

In line with the previous comment regarding a people trip assessment the predicted percentage modal split should have been applied to person trips or applied retrospectively to predict the number of trips by all modes that this development would attract in order that the developments impact upon all modes can be predicted.

It is noted that whilst the 2011 census recorded that only 66% travel to work trips for trips with a destination within the Middle Super Output Area (MSOA) Three Rivers 003 within the development is located are by car, the TA predicts based on information from their consultants that 87.5% of the trips to the proposed site will be by private car.

Trip Distribution/Assignment

The origin of motorised vehicle trips to the proposed development has been predicted according to the pattern of journey to work trips to the MSOA observed in the 2011 census considering origins with greater than 5 trips. The subsequent trips have been assigned to the road network according to the traffic routing information provided by Google Maps. HCC Highways are satisfied by this process in order to consider their distribution on the Hertfordshire road network.

Traffic Analysis

The TA subsequently presents traffic analysis of the following junctions:

- 3 x Site Accesses (PICADY).
- School Access / Langleybury Lane (PICADY).
- Langleybury Lane / Old House Lane (PICADY).
- Langleybury Lane / Fir Tree Hill (PICADY).
- A41 / Langleybury Lane (LinSig).
- M25 Junction 20 (LinSig).

- A41 Western Avenue / A411 Hempstead Road (LinSig).

However, the base models of these junctions have not been compared against existing queues in order to demonstrate that they are valid for use and at this time the council is unable to gauge the traffic impact of the proposals.

Travel Plan

HCC's Travel Plan teams notes that the walking and cycling route audit included in the Transport Assessment assesses routes to main destinations, provides recommendations made rather than commitments. However it is noted that there is a willingness to contribute towards off site walking/cycling improvements is stated. However, the developer must also actively install pedestrian/cycle infrastructure to encourage modal shift in the interim and update the travel plan to reflect them.

At 670m away, the nearest bus stop is over the recommended accessibility criteria that we use (400m) and bus services have changed since the Transport Assessment and Travel Plan was written.

There is still the hourly 501 service on Sun between Aylesbury and Watford, but the 500 route has gone and been replaced with the 508 Hemel Hempstead-Mt Vernon service (Mon-Sat half hourly, hourly). Bus users subsequently require to change in Hemel Hempstead if you want to get to Tring/B'std/Aylesbury Mon-Sat. However, buses now continue to Mt Vernon and there is a better service with both 501 and 508 running. The proposals include extension of the existing shuttle bus between The Grove, Watford Jnc and Town Hall (every 20-30 mins) into the site and a willingness to put on an extra electric shuttle bus to Kings Langley station.

Whilst an updated travel plan given the addition of a commitment to annual monitoring would be acceptable at this stage in the planning process and the travel plan is considered generally good, there will be a need to assess the adequacy of public transport links once staff/visitor origins known so shuttle services can be tailored appropriately to complement available bus services and other sustainable transport options. Prior to its full acceptance post planning the travel plan team further comment that:

- Travel Plan Co-Ordinator contact details as well as those of a secondary contact to be made available on appointment. Details of hours allocated to the role and frequency on site will also need to be provided once known.
- A statement of commitment to the effective implementation of the Travel Plan is provided from a suitable member of senior management once in post is made;.
- Paragraph 6.4 which states that feedback from staff will be included in the review process – this should be formalised with a Steering Group for the Travel Plan which can comprise key individuals and form part of other meetings/groups that exist on site.
- The package of proposed measures is comprehensive. Discussion with HCC is recommended regarding the travel app as others already exist (eg in Watford) and there may be an opportunity to create links to relevant websites/data such as HCC travel information.
- Monitoring needs to be annual rather than every other year as proposed, with targets for each year based on survey data. Review of the plan should then take place after each survey. It is noted that no target is set for visitors. If visitor numbers are insignificant compared to staff/film hub workers then this is satisfactory, but may need review if not.

□ An Evaluation and Support fee of £1200 per year (for a 5 year plan, so £6000 total) secured by S106 must be committed to.

Contributions

HCC Highways operate two levels of S106 agreements, with items directly mitigating the impact of a development agreed through Strand 1 S106 agreement and those items mitigating the wider cumulative impact of development addressed in a Strand 2 S106 agreement.

In the first instance HCC would envisage that the agreed junction improvements and travel plan contributions are delivered via a Strand 1 S106 agreement.

With regards to a Strand 2 contributions:

As part of the nearby Warner Bros planning application a contribution of £1,226,400 was agreed for to be used towards cycleway improvements (SM17 - A411 Hempstead Road and Grand Union Canal Corridor Cycleway Improvements) to support their 70,559sqm expansion. This is in addition to substantial offsite works which will be delivered by the developer. The proposed Langleybury House development is a circa 28,922sqm expansion and similar in nature and location. Therefore, if the development were to proceed, HCC Highways would request a pro rata contribution of £502,699. This would be in addition to the A41 toucan (delivered by developer) and be used towards the cycleway improvements serving the site.

Warner Bros are also committing £875,000 towards the improvement of the local bus services. Therefore, if the development were to proceed, HCC Highways would expect a proportional contribution of £358,661.

In total, if the development were to proceed, HCC Highways DM would expect a Strand 2 Contribution of £861,360.

1.1.12.2 Following receipt of these comments further information was submitted and sent to the Highways Authority for comment; comments dated 24 February 2023. The amended information overcame the Highways objections:

Recommendation

Notice is given under article 22 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 that Hertfordshire County Council as Highway Authority does not wish to restrict the grant of permission subject to the agreed to Strand 2 contribution and the following conditions:

CONDITIONS

1) No development shall commence until full details (in the form of scaled plans and / or written specifications) have been submitted to and approved in writing by the Local Planning Authority to illustrate the following:

- i) Roads, footways.
- ii) Cycleways.
- iii) Foul and surface water drainage.
- iv) Visibility splays
- v) Access arrangements
- vi) Parking provision in accordance with adopted standard.

vii) Loading areas.

viii) Turning areas.

Reason: To ensure suitable, safe and satisfactory planning and development of the site in

accordance with Policy 5 of Hertfordshire's Local Transport Plan (adopted 2018).

2) Existing Accesses – Widened or Improved

Prior to the first occupation / use hereby permitted the vehicular access improvements, as indicated on drawing number (2107-IFDO-00-RF-DR-A-1005 Rev J), shall be completed and thereafter retained in accordance with details/specifications to be submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority.

Reason: To ensure construction of a satisfactory access and in the interests of highway safety, traffic movement and amenity in accordance with Policy 5 of Hertfordshire's Local Transport Plan (adopted 2018).

3) Surface Water: Prior to the first use of the development hereby permitted, arrangement shall be made for surface water from the proposed development to be intercepted and disposed of separately so that it does not discharge onto the highway carriageway.

Reason: To avoid the carriage of extraneous material or surface water from or onto the highway in accordance with Policy 5 of Hertfordshire's Local Transport Plan (adopted 2018).

4) Electric Vehicle (EV) Charging Points as % of total car parking spaces

Prior to the first occupation / use of the development hereby permitted, provision shall be made for 20% of the car parking spaces to have active provision for EV charging and 80% of the car parking spaces to have passive provision for EV charging.

Reason: To ensure construction of a satisfactory development and to promote sustainable

development in accordance with Policies 5, 19 and 20 of Hertfordshire's Local Transport Plan (adopted 2018).

5) Cycle Parking – Not shown on plan but achievable

Prior to the first commencement of the development hereby permitted, a scheme for the parking of cycles including details of the design, level and siting shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be fully implemented before the development is first occupied (or brought into use) and thereafter retained for this purpose.

Reason: To ensure the provision of cycle parking that meets the needs of occupiers of the proposed development and in the interests of encouraging the use of sustainable modes of transport in accordance with Policies 1, 5 and 8 of Hertfordshire's Local Transport Plan(adopted 2018).

6) Construction Management Plan

No development shall commence until a Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority. Thereafter the construction of the development shall only be carried out in accordance with the

approved Plan: The Construction Management Plan / Statement shall include details of:

- a. Construction vehicle numbers, type, routing;
- b. Access arrangements to the site;
- c. Traffic management requirements
- d. Construction and storage compounds (including areas designated for car parking, loading / unloading and turning areas);
- e. Siting and details of wheel washing facilities;
- f. Cleaning of site entrances, site tracks and the adjacent public highway;
- g. Timing of construction activities (including delivery times and removal of waste) and to avoid school pick up/drop off times;
- h. Provision of sufficient on-site parking prior to commencement of construction activities;
- i. Post construction restoration/reinstatement of the working areas and temporary access to the public highway;
- j. where works cannot be contained wholly within the site a plan should be submitted showing the site layout on the highway including extent of hoarding, pedestrian routes and remaining road width for vehicle movements;
- k. Phasing Plan.

Reason: In order to protect highway safety and the amenity of other users of the public highway and rights of way in accordance with Policies 5, 12, 17 and 22 of Hertfordshire's Local Transport Plan (adopted 2018).

7) Highway Improvements – Offsite

A) Design Approval

Notwithstanding the details indicated on the submitted drawings, no on-site works above slab level* shall commence until a detailed scheme for the off-site highway improvement works as indicated on drawing number (4909-006-Rev-) have been submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority.

B) Implementation / Construction

Prior to the first use of the development hereby permitted, the improvement works referred to in part A of this condition shall be completed in accordance with the approved details.

Reason: To ensure construction of a satisfactory development and that the highway improvement works are designed to an appropriate standard in the interest of highway safety and amenity and in accordance with Policy 5, 13 and 21 of Hertfordshire's Local Transport Plan (adopted 2018).

8) Rights of Way

A) Design Approval

Notwithstanding the details indicated on the submitted drawings no on-site works above slab level shall commence on site unless otherwise agreed in writing until a

Rights of Way Improvement Plan for the off-site and on-site Rights of Way improvement works has/have been submitted to and approved in writing by the Local Planning Authority.

B) Implementation / Construction

Prior to the first occupation/use of the development hereby permitted the off-site and on-site Rights of Way improvement plan works (including any associated highway works) referred to in Part A of this condition shall be completed to the written satisfaction of the Local Planning Authority.

Reason: To ensure construction of a satisfactory development and that the highway improvement works are designed to an appropriate standard in the interest of highway safety and amenity and in accordance with Policy 5, 13 and 21 of Hertfordshire's Local Transport Plan (adopted 2018).

9) Travel Plan – Requested Prior to Use

At least 3 months prior to the first occupation / use of the approved development a detailed Travel Plan for the site shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Highways Authority. The approved Travel Plan shall be implemented in accordance with the timetable and target contained therein and shall continue to be implemented as long as any part of the development is occupied subject to approved modifications agreed by the Local Planning Authority in consultation with the Highway Authority as part of the annual review.

Reason: To ensure that sustainable travel options associated with the development are promoted and maximised to be in accordance with Policies 3, 5, 7, 8, 9 and 10 of Hertfordshire's Local Transport Plan (adopted 2018).

10) Requirement for Traffic Monitoring

No development shall commence until a monitoring programme to assess the level of traffic generation at defined intervals of occupancy shall be submitted to and approved in writing by the Local Planning Authority. The monitoring programme shall be implemented as agreed.

Reason: To ensure that agreed traffic levels are not breached and thus highway network is adequate to cater for the development proposed to be in accordance with Policies 5 and 12 of Hertfordshire's Local Transport Plan (adopted 2018).

APPROPRIATE INFORMATIVES

HCC as Highway Authority recommends inclusion of the following Advisory Note (AN) / highway informative to ensure that any works within the highway are carried out in accordance with the provisions of the Highway Act 1980:

AN1) Extent of Highway: Information on obtaining the extent of public highway around the site can be obtained from the HCC website:

www.hertfordshire.gov.uk/services/highways-roads-and-pavements/changes-to-your-oad/extent-of-highways.aspx

AN2) Storage of materials: The applicant is advised that the storage of materials associated with the construction of this development should be provided within the site on land which is not public highway, and the use of such areas must not interfere with the public highway. If this is not possible, authorisation should be sought from the Highway Authority before construction works commence.

Further information is available via the County Council website at:

<https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/business-licences/business-licences.aspx> or by telephoning 0300 1234047.

AN3) Obstruction of highway: It is an offence under section 137 of the Highways Act 1980 for any person, without lawful authority or excuse, in any way to wilfully obstruct the free passage along a highway or public right of way. If this development is likely to result in the public highway or public right of way network becoming routinely blocked (fully or partly) the applicant must contact the Highway Authority to obtain their permission and requirements before construction works commence.

Further information is available via the County Council website at:

<https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/business-licences/business-licences.aspx> or by telephoning 0300 1234047.

AN4) Debris and deposits on the highway: It is an offence under section 148 of the Highways Act 1980 to deposit compost, dung or other material for dressing land, or any rubbish on a made up carriageway, or any or other debris on a highway to the interruption of any highway user. Section 149 of the same Act gives the Highway Authority powers to remove such material at the expense of the party responsible. Therefore, best practical means shall be taken at all times to ensure that all vehicles leaving the site during construction of the development and use thereafter are in a condition such as not to emit dust or deposit mud, slurry or other debris on the highway. Further information is available by telephoning 0300 1234047.

AN5) Avoidance of surface water discharge onto the highway: The applicant is advised that the Highway Authority has powers under section 163 of the Highways Act 1980, to take appropriate steps where deemed necessary (serving notice to the occupier of premises adjoining a highway) to prevent water from the roof or other part of the premises falling upon persons using the highway, or to prevent so far as is reasonably practicable, surface water from the premises flowing on to, or over the footway of the highway.

AN6) Works within the highway (section 278): The applicant is advised that in order to comply with this permission it will be necessary for the developer of the site to enter into an agreement with Hertfordshire County Council as Highway Authority under Section 278 of the Highways Act 1980 to ensure the satisfactory completion of the access and associated road improvements. The construction of such works must be undertaken to the satisfaction and specification of the Highway Authority, and by a contractor who is authorised to work in the public highway. Before works commence the applicant will need to apply to the Highway Authority to obtain their permission and requirements. Further information is available via the County Council website at:

<https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-anagement.aspx> or by telephoning 0300 1234047.

AN7) Roads to remain private: The applicant is advised that all new roads/ access routes associated with this development will remain unadopted (and shall not be maintained at public expense by the highway authority). At the entrance of the new estate the road name plate should indicate that it is a private road and the developer should put in place permanent arrangements for long-term maintenance.

AN8) Construction Management Plan (CMP): The purpose of the CMP is to help developers minimise construction impacts and relates to all construction activity both on and off site that impacts on the wider environment. It is intended to be a live document whereby different stages will be completed and submitted for application as the development progresses. A completed and signed CMP must address the way in which any impacts associated with the proposed works, and any cumulative impacts of other nearby construction sites will be mitigated and managed. The level of detail required in a CMP will depend on the scale and nature of development.

The CMP would need to include elements of the Construction Logistics and Community Safety (CLOCS) standards as set out in our Construction Management template, a copy of which is available on the County Council's website at:

<https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx>

AN9) The Public Right of Way(s) should remain unobstructed by vehicles, machinery, materials, tools and any other aspects of the construction during works. Safe passage past the site should be maintained at all times for the public using this route. The condition of the route should not deteriorate as a result of these works. Any adverse effects to the surface from traffic, machinery or materials (especially overflows of cement & concrete) should be made good by the applicant to the satisfaction of the Highway Authority. No materials shall be stored or left on the Highway including Highway verges. If the above conditions cannot reasonably be achieved, then a Temporary Traffic Regulation Order (TTRO) would be required to close the affected route and divert users for any periods necessary to allow works to proceed, for which a fee would be payable to Hertfordshire County Council. Further information is available via the County Council website at <https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/countryside-access/rightsof-way/rights-of-way.aspx> or by contacting Rights of Way, Hertfordshire County Council on 0300 123 4047.

AN10) Abnormal loads and importation of construction equipment (i.e. large loads with: a width greater than 2.9m; rigid length of more than 18.65m or weight of 44,000kg - commonly applicable to cranes, piling machines etc.): The applicant is directed to ensure that operators conform to the provisions of The Road Vehicles (Authorisation of Special Types) (General) Order 2003 in ensuring that the Highway Authority is provided with notice of such movements, and that appropriate indemnity is offered to the Highway Authority. Further information is available via the Government website www.gov.uk/government/publications/abnormal-load-movements-application-and-notification-forms or by telephoning 0300 1234047.

AN11) Travel Plan (TP): A TP, in accordance with the provisions as laid out in Hertfordshire County Council's Travel Plan Guidance, would be required to be in place from the first occupation/use until 5 years post occupation/use. A £1,200 per annum (overall sum of £6000 and index-linked RPI March 2014) Evaluation and Support Fee would need to be secured via a Section 106 agreement towards supporting the implementation, processing and monitoring of the full travel plan including any engagement that may be needed. Further information is available via the County Council's website at: <https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx> OR by emailing travelplans@hertfordshire.gov.uk

COMMENTS

The existing Langleybury Estate (film hub and Children's farm) is located circa 6-7km cycle northwest of Watford's town centre and rail station. In addition to access to the national rail network the rail station also provides access to the London Over and Underground networks. The estate is bound to the south by the A41 spur road to Junction 19 of the M25 (dual carriageway); to the east by the River Gade and a single carriageway section of the A41 which bridges over the river; to the Northeast by the St Pauls CoE primary school; and to the north and west by the single carriageway Langleybury Lane. The film hub/ House and Children's Farm are located towards the north west of the estate. The A41 currently provides a barrier to the site for direct pedestrian/cycle access from the residential area of Abbots Langley (circa 1-4km east of the site).

The estate currently has two formal motorised vehicle accesses from Langleybury Lane, one directly opposite Langleybury Fields (farm access track and PROW 45) which serves the existing house/film hub; and a second access circa 30m north which serves the Children's Farm. There is also a third motor vehicle access onto Langleybury Lane for an individual residential property (South Lodge) and the southern field of the estate. A fourth and narrow (circa 3m wide) gated access to the northern fields of the estate forms the western arm of the mini roundabout which serves as the motor vehicle access to the St Paul's CoE primary school. The northeastern arm of the roundabout forms a priority 'T' junction with Langleybury Lane. circa 80m north east.

Proposals are to expand the Film Hub and relocate the Children's Farm north within the estate towards the St Paul's CoE Primary school access.

It is proposed that the former Children's Farm access is upgraded to facilitate two way working and HGV access and becomes the principal motor vehicle access to the Film Hub. Whilst the former main road access, which would be similarly upgraded, becomes a secondary vehicle road access.

The third and less formal to the estate is to be upgraded into a formalised access that can also support two way traffic and HGV's.

The new Children's Farm and a small (50 space) car park shared with the primary school would be accessed the existing school access onto Langleybury Lane.

HCC Highways DM had originally objected to the proposals having then considered primarily that they were not at the time compliant with the policies both national and local, particularly those contained in HCC's Local Transport Plan (LTP) 4, aimed at creating sustainable developments. Secondly and related to the primary objection, HCC considered there was insufficient information on the number of person trips numbers to allow the council to gauge the impact of this development upon the sustainable transport network. At the time the suitability of the base traffic models were yet to be confirmed demonstrating their suitability for use in further traffic assessment.

Caneparo Associates have subsequently responded to these objections and HCC Highways request for Strand 2 Contribution in a Transport Technical Note (N12-JT-SD-Transport Response Note HCC F2 (230206)). Subsequently, this response by HCC Highways Development Management (DM) considers that note in addition to the original Transport Assessment (TA, October 2022).

Sustainable Transport Policy

Whilst proposals would upgrade the PROW network within the estate and establish a new foot/cycle path to the west side of the A41; the A41 is considered a barrier to direct sustainable access to the site to/from the nearby residential area of Abbots

Langley. HCC proposed a Toucan crossing of the A41 to overcome this barrier and unlock the site sustainably. Initially the applicant through Caneparo did not consider the crossing was required.

However the need for the Toucan crossing has now been recognised:

"It is understood that should a toucan crossing be provided that the proposed development would be compliant with Policy 1 and Policy 5, as the walking/cycling route to/from Abbots Langley would be improved."

Whilst Caneparo has also indicated that 'the Applicant is willing to provide the funding in order to allow a toucan crossing to be provided'. HCC Highways consider that in order to unlock the site in time appropriate to the development it is considered that the applicant should provide the crossing under a S278 agreement rather than waiting for the council to develop a scheme.

HCC Highways also had concern over the number of motor vehicle accesses to the proposal site, considering that this also did not establish a policy compliant site that considers the sustainable modes first. However, Caneparo have explained that for operational reasons the three accesses are required. Caneparo also point out that the original proposals had yet more accesses still and the number of proposed access have already been rationalised according to pre applications discussions with HCC Highways and further rationalisation would not be efficient in terms of the site operation.

Given the provision of the crossing and the explanation regarding the number of vehicle access points HCC Highways will withdraw the objection on policy grounds.

Mode Split

As indicated previously initially HCC Highways DM considered that there was insufficient information within the TA regarding the number of person trip numbers which would allow the council to gauge the impact of this development upon the sustainable transport network.

Caneparo have subsequently provided this information to HCC Highways in the transport technical note. It must be noted that estimates by Caneparo are based on a 87.5% usage of the private car, whereas the application travel plan seek to reduce this to 70% through greater use of the sustainable modes which the above 'toucan' crossing will help to facilitate. The existing modal split for employees destinating in Three Rivers 003 (the area which includes the site and west side of Kings Langley) includes only 66% driver mode share. 78% of employment trips destinating in the southern area of Kings Langley (Three Rivers 002) are driving a private car and 73% of employment trips destinating in the northern area of Kings Langley (Three Rivers 001). Therefore, the 70% target is considered realistic at this stage.

Furthermore, HCC Highways now accept the traffic generation attributed to the site subsequent to the person trip generation approach presented in the Traffic Technical Note.

Modelling

As indicated earlier HCC were unable to consider the traffic modelling analysis presented in the TA as it had not been demonstrated at that time that the base traffic models used in the analysis were approximately reflective of observed traffic queues. It must be noted however, that it is only feasible to capture traffic data, including queues, for a limited time window. There is also a large debate as to what actually constitutes a queue. Furthermore, a traffic model is unable to reflect the constantly adaptive nature of the traffic network. Thus predicted queues in a traffic model should

not necessarily exactly match only give an indication whether the model is approximately valid.

In response to HCC Highways concerns Caneparo have produced a Traffic Model Validation Report (Appendix E of the Transport Technical Note). The report also demonstrated the robustness of the utilised traffic inputs into the model. Having reviewed the Validation Report HCC Highways DM now consider the base traffic models suitable for further analysis.

Caneparo indicate that for distribution purposes they have selected Travel to Work trips residing MSOA 003 with destinations elsewhere from the 2011 Census results. HCC Highways consider though that this is the wrong way round and journey to work trips destinating in MSOA 003 and originating elsewhere should have been used for estimation purposes. However, once removing the large number of trips that drive within MSOA alone for work, HCC Highways have not found the utilised distribution estimate significantly different from that estimated by HCC Highways. Therefore, HCC Highways are happy with the distribution estimate utilised by Caneparo.

Caneparo have subsequently assigned these trip estimates to the highway network using Google Maps and making assumptions about the accesses use. HCC Highways are also satisfied with this.

M25 Junction 20

The analysis of the M25 Junction 20 roundabout presented by Caneparo indicated that the signalised roundabout operates currently well above its effective operational capacity (90% DoS) and just within its absolute capacity (100% DoS) during the peak hour. With the A41 southbound approach being subject to the most significant queuing (circa 36 pcu's per lane during the AM peak just before the lights change to green).

With growth alone 2025 the roundabout goes just over absolute capacity during the network peak hours (101.1% AM and 103.3% PM). The original Caneparo TA indicated that the queuing remains the exact same during the most critical AM peak hour, however that was considered by HCC Highways to be a 'copy and paste error' and Caneparo have sent a revised table of results for this junction which predicts (under growth alone) the highest mean maximum queue (MMQ) on the A41 southbound approach would rise to 42pcu's (passenger car equivalents). With the addition of the proposed development due largely to the instability of the junction operating over absolute capacity the highest MMQ rises by 5pcu's. Whilst not ideal, HCC do not consider that this is a significant impact that can't be mitigated through the travel plan process and improving the site's accessibility (predominantly the A41 toucan).

A41/ Langleybury Lane Traffic Signal Junction

The A41/ Langleybury Lane traffic signals according to the Caneparo analysis are currently

operating slightly above their optimal traffic efficiency level (90%) during the AM peak hour with the inside lane of the southbound A41 approach being slightly over capacity (although still within absolute capacity, 100%) at 91.3% seeing a MMQ of 23 pcu's before the lights go green. According to the Caneparo model all other approaches operate within capacity during the AM peak hour and the junction operates with sufficient operational capacity.

With traffic growth alone to 2025 the A41/ Langleybury Lane the performance of the traffic signals are predicted by the Caneparo model to slightly deteriorate. However,

the overall situation is approximately the same as presently. The degree of saturation of the inside lane of the southbound A41 approach being 92.5% during the AM peak hour and the corresponding MMQ before the lights go green is predicted to rise slightly to 24pcu. Furthermore, the junction though performs within its absolute capacity during the AM peak. During the PM peak hour as before the junction operates within its ideal capacity.

The addition of the development traffic in the AM peak hour is shown to have a significant impact.

The degree of Saturation of the inside lane of the southbound A41 rises to almost absolute capacity at 99.7% and the corresponding queue rises to 38pcu. HCC Highways consider that it is appropriate to mitigate this impact through the travel plan process, improving the site's accessibility (predominantly the A41 toucan) and as discussed at the end of this response contribution to schemes encouraging a wider modal shift.

A41/ Hempstead Road Partially Signalised Roundabout

The prepared model of the A41/ Hempstead Road Partially Signalised Roundabout suggests that the roundabout currently is operating over its operationally ideal capacity (90%) but within its absolute capacity (100%) during both peak hours. With the junction operating at 97.1% during the AM peak hour and 98.3% during the PM peak respectively. As with the previous analysis it is the southbound approach that experiences the greatest degree of congestion during the AM, operating with a Degree of Saturation of 97.1% and a MMQ of 8pcu, although other links within the junction experience slightly more queuing despite a lower operating DoS. During the PM conversely the NB approach to the roundabout suffers most, where the DoS is 98.3% and a queue of 22pcu's spread across 2 lanes.

With growth alone to 2025 the junction is predicted to be nearly at absolute capacity during the AM peak (DoS = 99.8%) and over its absolute capacity during the PM peak (DoS = 100.6%). This is seen in the queuing increasing slightly on the SB approach during the AM peak (MMQ = 11pcu's) but rising substantially for the NB approach during the PM peak where the predicted MMQ across two lanes is 48pcu's.

As growth due to other developments has done to the PM junction performance, growth due to the proposed development pushes the junction over absolute capacity during the AM peak (DoS = 100.8%) and the queuing rises significantly to 37 pcu's. During the PM peak hour whilst the proposals have little impact upon the peak NB direction, they create a new slightly greater peak on the southbound approach of 105.5% which generates significant queuing of 48 pcu's which is confined to a single lane (the left lane being a free flow slip). HCC Highways consider that it is important to mitigate this severe impact through the travel plan process, improving the site's accessibility (predominantly the A41 toucan) and as discussed at the end of this response contribution to schemes encouraging a wider modal shift.

Site Access Junctions, Old House Lane / Langleybury Lane and Grove Mill Lane / Langleybury Lane

The analysis presented by Caneparo indicates that the existing access junctions that will be reconfigured; Old House Lane / Langleybury Lane and Grove Mill Lane / Langleybury Lane are currently (2022) operating well within capacity at the moment with little or no queuing evident.

During the peak hours of 2025 prior to expansion of the Langleybury Studios the performance of these junctions (the existing access junctions that will be reconfigured; Old House Lane / Langleybury Lane and Grove Mill Lane / Langleybury

Lane) changes little, operating well within capacity and with little or no queuing evident.

With the addition of the proposed development and reconfiguring of the junctions there is a very marginal increase in queuing at the Grove Mill Lane / Langleybury Lane junction but certainly nothing that would be considered significant and the junction remains significantly within capacity (with the highest RFC being 0.26, where 0.85 is the desirable maximum capacity and 1.0 is the absolute maximum capacity). The other junctions (the reconfigured access junctions and Old House Lane / Langleybury Lane) continue to operate with significant spare capacity (the highest RFC being 0.13).

Contributions

HCC Highways operate two levels of mitigation agreements (Strand 1 and Strand 2). Strand 1 mitigation works being works that are directly required to unlock the development and solely the responsibility of the development. Strand 2 mitigation works being works that address the wider cumulative impact of the development for which the development isn't solely responsible for but does derive benefit from.

In the first instance HCC would envisage that the agreed junction improvements and travel plan contributions are delivered via a Strand 1 s106 agreement. This includes the support fee for the aforementioned Travel Plan.

In the second instance (Strand 2) HCC calculate an appropriate headline figure based on the findings of HCC's adopted Developers Planning Obligation Toolkit (2021). Strand 2 contributions should address the cumulative impacts of all development, large and small, facilitating delivery and enhancement of the necessary active and sustainable transport networks. These local sustainable networks must be provided in their entirety to provide the sustainable connections to the key trip generators, as such contributions will be pooled to fund these networks within the local area (subject to any legislative restrictions), as supported by National Planning Policy Framework (NPPF). This second strand contribution is intended to help implement broader transport measures in the catchments of new development from which contributions are secured. The need for second strand contributions will be balanced against the level of first strand contributions and any other relevant planning matters.

As part of the nearby Warner Bros planning application a contribution of £1,226,400 was agreed for to be used towards cycleway improvements (SM17 - A411 Hempstead Road and Grand Union Canal Corridor Cycleway Improvements) to support their 70,559sqm expansion. This is in addition to substantial offsite works which will be delivered by the developer. The proposed Langleybury House development is a circa 28,922sqm expansion and similar in nature and location. Therefore, if the development were to proceed, HCC Highways would request a pro rata contribution of £502,699.

This would be in addition to the A41 toucan (delivered by developer) and be used towards the cycleway improvements serving the site.

Warner Bros are also committing £875,000 towards the improvement of the local bus services.

Therefore, if the development were to proceed, HCC Highways would expect a proportional contribution of £358,661.

In total, if the development were to proceed, HCC Highways DM would expect a Strand 2 Contribution of £861,360.

Caneparo have agreed to this contribution in their February 2023 Transport Note "The requested contribution of £861,360 is agreed".

Summary

In summary, HCC Highways DM agrees that with the provision of the Toucan crossing, in order to establish a policy compliant proposal, and strand 2 contributions, to mitigate the development's impact in the area, our objection can be withdrawn. In order however, that the crossing is provided in good time to unlock this development sustainably in the interest of the developer it requires to be provided under a S278 agreement.

1.1.12.3 **Comments received in relation to the amended scheme dated 13 September 2023:**

Notice is given under article 22 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 that Hertfordshire County Council as Highway Authority does not wish to restrict the grant of permission subject to the following conditions and the agreed contribution of £861,360:

CONDITIONS

1) No development shall commence until full details (in the form of scaled plans and / or written specifications) have been submitted to and approved in writing by the Local Planning Authority to illustrate the following:

i) Roads, footways.

ii) Cycleways.

iii) Foul and surface water drainage.

iv) Visibility splays

v) Access arrangements

vi) Parking provision in accordance with adopted standard.

vii) Loading areas.

viii) Turning areas.

Reason: To ensure suitable, safe and satisfactory planning and development of the site in accordance with Policy 5 of Hertfordshire's Local Transport Plan (adopted 2018).

2) Existing Accesses – Widened or Improved

Prior to the first occupation / use hereby permitted the vehicular access improvements, as indicated on drawing numbers (2107-IFDO-00-RF-DR-A-1005 Rev N and 4909-005 (Sheets 1-4) Rev B), shall be completed and thereafter retained in accordance with details/specifications to be submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority.

Reason: To ensure construction of a satisfactory access and in the interests of highway safety, traffic movement and amenity in accordance with Policy 5 of Hertfordshire's Local Transport Plan (adopted 2018).

3) Surface Water: Prior to the first use of the development hereby permitted, arrangement shall be made for surface water from the proposed development to be intercepted and disposed of separately so that it does not discharge onto the highway carriageway.

Reason: To avoid the carriage of extraneous material or surface water from or onto the highway in accordance with Policy 5 of Hertfordshire's Local Transport Plan (adopted 2018).

4) Electric Vehicle (EV) Charging Points as % of total car parking spaces Prior to the first occupation / use of the development hereby permitted, provision shall be made for 20% of the car parking spaces to have active provision for EV charging and 80% of the car parking spaces to have passive provision for EV charging.

Reason: To ensure construction of a satisfactory development and to promote sustainable development in accordance with Policies 5, 19 and 20 of Hertfordshire's Local Transport Plan (adopted 2018).

5) Cycle Parking – Not shown on plan but achievable

Prior to the first commencement of the development hereby permitted, a scheme for the parking of cycles including details of the design, level and siting shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be fully implemented before the development is first occupied (or brought into use) and thereafter retained for this purpose.

Reason: To ensure the provision of cycle parking that meets the needs of occupiers of the proposed development and in the interests of encouraging the use of sustainable modes of transport in accordance with Policies 1, 5 and 8 of Hertfordshire's Local Transport Plan(adopted 2018) 6) Construction Management Plan No development shall commence until a Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority. Thereafter the construction of the development shall only be carried out in accordance with the approved Plan: The Construction Management Plan / Statement shall include details of:

- a. Construction vehicle numbers, type, routing;
- b. Access arrangements to the site;
- c. Traffic management requirements
- d. Construction and storage compounds (including areas designated for car parking, loading / unloading and turning areas);
- e. Siting and details of wheel washing facilities;
- f. Cleaning of site entrances, site tracks and the adjacent public highway;
- g. Timing of construction activities (including delivery times and removal of waste) and to avoid school pick up/drop off times;
- h. Provision of sufficient on-site parking prior to commencement of construction activities;
- i. Post construction restoration/reinstatement of the working areas and temporary access to the public highway;
- j. where works cannot be contained wholly within the site a plan should be submitted showing the site layout on the highway including extent of hoarding, pedestrian routes and remaining road width for

vehicle movements;

k. Phasing Plan.

Reason: In order to protect highway safety and the amenity of other users of the public highway and rights of way in accordance with Policies 5, 12, 17 and 22 of Hertfordshire's Local Transport Plan (adopted 2018).

7) Highway Improvements – Offsite

A) Design Approval

Notwithstanding the details indicated on the submitted drawings, no on-site works above slab level* shall commence until a detailed scheme for the off-site highway improvement works as indicated on drawing number (4909-006-Rev-) have been submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority.

B) Implementation / Construction

Prior to the first use of the development hereby permitted, the improvement works referred to in part A of this condition shall be completed in accordance with the approved details.

Reason: To ensure construction of a satisfactory development and that the highway improvement works are designed to an appropriate standard in the interest of highway safety and amenity and in accordance with Policy 5, 13 and 21 of Hertfordshire's Local Transport Plan (adopted 2018).

8) Rights of Way

A) Design Approval

Notwithstanding the details indicated on the submitted drawings no on-site works above slab level shall commence on site unless otherwise agreed in writing until a Rights of Way Improvement Plan for the off-site and on-site Rights of Way improvement works has/have been submitted to and approved in writing by the Local Planning Authority.

B) Implementation / Construction

Prior to the first occupation/use of the development hereby permitted the off-site and on-site Rights of Way improvement plan works (including any associated highway works) referred to in Part A of this condition shall be completed to the written satisfaction of the Local Planning Authority.

Reason: To ensure construction of a satisfactory development and that the highway improvement works are designed to an appropriate standard in the interest of highway safety and amenity and in accordance with Policy 5, 13 and 21 of Hertfordshire's Local Transport Plan (adopted 2018).

9) Travel Plan – Requested Prior to Use

At least 3 months prior to the first occupation / use of the approved development a detailed Travel Plan for the site shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Highways Authority. The approved Travel Plan shall be implemented in accordance with the timetable and target contained therein and shall continue to be implemented as long as any part of the development is occupied subject to approved modifications agreed by the Local Planning Authority in consultation with the Highway Authority as part of the annual review.

Reason: To ensure that sustainable travel options associated with the development are promoted and maximised to be in accordance with Policies 3, 5, 7, 8, 9 and 10 of Hertfordshire's Local Transport Plan (adopted 2018).

10) Requirement for Traffic Monitoring

No development shall commence until a monitoring programme to assess the level of traffic generation at defined intervals of occupancy shall be submitted to and approved in writing by the Local Planning Authority. The monitoring programme shall be implemented as agreed.

Reason: To ensure that agreed traffic levels are not breached and thus highway network is adequate to cater for the development proposed to be in accordance with Policies 5 and 12 of Hertfordshire's Local Transport Plan (adopted 2018).

APPROPRIATE INFORMATIVES

HCC as Highway Authority recommends inclusion of the following Advisory Note (AN) / highway informative to ensure that any works within the highway are carried out in accordance with the provisions of the Highway Act 1980:

AN1) Extent of Highway: Information on obtaining the extent of public highway around the site can be obtained from the HCC website:

www.hertfordshire.gov.uk/services/highways-roads-and-pavements/changes-to-your-road/extent-of-highways.aspx

AN2) Storage of materials: The applicant is advised that the storage of materials associated with the construction of this development should be provided within the site on land which is not public highway, and the use of such areas must not interfere with the public highway. If this is not possible, authorisation should be sought from the Highway Authority before construction works commence.

Further information is available via the County Council website at:

<https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/business-licences/business-licences.aspx> or by telephoning 0300 1234047.

AN3) Obstruction of highway: It is an offence under section 137 of the Highways Act 1980 for any person, without lawful authority or excuse, in any way to wilfully obstruct the free passage along a highway or public right of way. If this development is likely to result in the public highway or public right of way network becoming routinely blocked (fully or partly) the applicant must contact the Highway Authority to obtain their permission and requirements before construction works commence.

Further information is available via the County Council website at:

<https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/business-licences/business-licences.aspx> or by telephoning 0300 1234047.

AN4) Debris and deposits on the highway: It is an offence under section 148 of the Highways Act 1980 to deposit compost, dung or other material for dressing land, or any rubbish on a made up carriageway, or any or other debris on a highway to the interruption of any highway user. Section 149 of the same Act gives the Highway Authority powers to remove such material at the expense of the party responsible. Therefore, best practical means shall be taken at all times to ensure that all vehicles leaving the site during construction of the development and use thereafter are in a

condition such as not to emit dust or deposit mud, slurry or other debris on the highway. Further information is available by telephoning 0300 1234047.

AN5) Avoidance of surface water discharge onto the highway: The applicant is advised that the Highway Authority has powers under section 163 of the Highways Act 1980, to take appropriate steps where deemed necessary (serving notice to the occupier of premises adjoining a highway) to prevent water from the roof or other part of the premises falling upon persons using the highway, or to prevent so far as is reasonably practicable, surface water from the premises flowing on to, or over the footway of the highway.

AN6) Works within the highway (section 278): The applicant is advised that in order to comply with this permission it will be necessary for the developer of the site to enter into an agreement with Hertfordshire County Council as Highway Authority under Section 278 of the Highways Act 1980 to ensure the satisfactory completion of the access and associated road improvements. The construction of such works must be undertaken to the satisfaction and specification of the Highway Authority, and by a contractor who is authorised to work in the public highway. Before works commence the applicant will need to apply to the Highway Authority to obtain their permission and requirements. Further information is available via the County Council website at:

<https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx> or by telephoning 0300 1234047.

AN7) Roads to remain private: The applicant is advised that all new roads/ access routes associated with this development will remain unadopted (and shall not be maintained at public expense by the highway authority). At the entrance of the new estate the road name plate should indicate that it is a private road and the developer should put in place permanent arrangements for long-term maintenance.

AN8) Construction Management Plan (CMP): The purpose of the CMP is to help developers minimise construction impacts and relates to all construction activity both on and off site that impacts on the wider environment. It is intended to be a live document whereby different stages will be completed and submitted for application as the development progresses. A completed and signed CMP must address the way in which any impacts associated with the proposed works, and any cumulative impacts of other nearby construction sites will be mitigated and managed. The level of detail required in a CMP will depend on the scale and nature of development.

The CMP would need to include elements of the Construction Logistics and Community Safety (CLOCS) standards as set out in our Construction Management template, a copy of which is available on the County Council's website at:

<https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx>

AN9) The Public Right of Way(s) should remain unobstructed by vehicles, machinery, materials, tools and any other aspects of the construction during works. Safe passage past the site should be maintained at all times for the public using this route. The condition of the route should not deteriorate as a result of these works. Any adverse effects to the surface from traffic, machinery or materials (especially overspills of cement & concrete) should be made good by the applicant to the satisfaction of the Highway Authority. No materials shall be stored or left on the Highway including Highway verges. If the above conditions cannot reasonably be achieved, then a Temporary Traffic Regulation Order (TTRO) would be required to close the affected

route and divert users for any periods necessary to allow works to proceed, for which a fee would be payable to Hertfordshire County Council. Further information is available via the County Council website at <https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/countryside-access/rightsofway/rights-of-way.aspx> or by contacting Rights of Way, Hertfordshire County Council on 0300 123 4047.

AN10) Abnormal loads and importation of construction equipment (i.e. large loads with: a width greater than 2.9m; rigid length of more than 18.65m or weight of 44,000kg - commonly applicable to cranes, piling machines etc.): The applicant is directed to ensure that operators conform to the provisions of The Road Vehicles (Authorisation of Special Types) (General) Order 2003 in ensuring that the Highway Authority is provided with notice of such movements, and that appropriate indemnity is offered to the Highway Authority. Further information is available via the Government website www.gov.uk/government/publications/abnormal-load-movements-application-and-notification-forms or by telephoning 0300 1234047.

AN11) Travel Plan (TP): A TP, in accordance with the provisions as laid out in Hertfordshire County Council's Travel Plan Guidance, would be required to be in place from the first occupation/use until 5 years post occupation/use. A £1,200 per annum (overall sum of £6000 and index-linked RPI March 2014) Evaluation and Support Fee would need to be secured via a Section 106 agreement towards supporting the implementation, processing and monitoring of the full travel plan including any engagement that may be needed. Further information is available via the County Council's website at:

<https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx> OR by emailing travelplans@hertfordshire.gov.uk

COMMENTS

The existing Langleybury Estate (film hub and Children's farm) is located circa 6-7km cycle northwest of Watford's town centre and rail station. In addition to access to the national rail network the rail station also provides access to the London Over and Underground networks. The estate is bound to the south by the A41 spur road to Junction 19 of the M25 (dual carriageway); to the east by the River Gade and a single carriageway section of the A41 which bridges over the river; to the Northeast by the St Pauls CoE primary school; and to the north and west by the single carriageway Langleybury Lane. The film hub/ House and Children's Farm are located towards the north west of the estate. The A41 currently provides a barrier to the site for direct pedestrian/cycle access from the residential area of Abbots Langley (circa 1-4km east of the site).

The estate currently has two formal motorised vehicle accesses from Langleybury Lane, one directly opposite Langleybury Fields (farm access track and PROW 45) which serves the existing house/film hub; and a second access circa 30m north which serves the Children's Farm. There is also a third motor vehicle access onto Langleybury Lane for an individual residential property (South Lodge) and the southern field of the estate. A fourth and narrow (circa 3m wide) gated access to the northern fields of the estate forms the western arm of the mini roundabout which serves as the motor vehicle access to the St Paul's CoE primary school. The northeastern arm of the roundabout forms a priority 'T' junction with Langleybury Lane. circa 80m north east.

Proposals are to expand the Film Hub and relocate the Children's Farm north within the estate towards the St Paul's CoE Primary school access.

HCC Highways previously (24 February 2023) recommended approval of the site in response to Caneparo February 2023 Transport Note (N12-JT-SD-Transport Response Note HCC F2 (230206)) which addressed issues that HCC Highways had subsequent to the original application and agreed to provide through S278 a signalised crossing of the A41 to unlock the site sustainably in the immediate area and provide a Strand 2 (sustainable transport) contribution of £861,360 towards cycleway improvements the A411 Hempstead Road and Grand Union Canal Corridor (SM17) to complete the unlocking. The latest application seeks to lower the consented floor space in response to consultation with Historic England but continues to offer the provision of the A41 Toucan and the £861,360 Strand 2 contribution therefore, HCC Highways continues to recommend approval, where the conditions above are almost identical to the previous conditions apart from the updating of the access drawing references.

1.1.13 National Highways: [No Objection – National Highways have confirmed that their No Objection Response dated 20 December 2022 remains unchanged following the submission of the revised proposal].

1.1.13.1 **Comments, dated 23 November 2022 recommending planning permission not be granted for a specified period of time:**

Referring to the planning application referenced above, notice is hereby given that Highways England's formal recommendation is that we

a) offer no objection (see reasons at Annex A);

b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);

c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);

d) recommend that the application be refused (see reasons at Annex A)

Highways Act 1980 Section 175B is not relevant to this application.¹

¹ Where relevant, further information will be provided within Annex A.

National Highways Planning Response (NHPR 22-10) October 2022

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the Town and Country Planning (Development Affecting Trunk Roads) Direction 2018, via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

Annex A

National Highway's assessment of the proposed development NH has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN).

The SRN is a critical national asset and as such NH works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

In the case of this proposed site, National Highways is interested in the potential impact that the development might have upon the M25 Junction 20. We are interested as to whether there would be any adverse safety implications or material increase in queues and delays on the SRN during the construction and operation.

Accident data

Accident data has been analysed for 2017 to 2021. Two years of this data was during the Covid-19 pandemic where there were restrictions on travel. NH therefore request that data for a five-year period prior to the Covid-19 pandemic is analysed to ensure that the effects of the pandemic has been considered. Data used must be Stats 19 validated data. Furthermore, it is requested that Figure 2.4 is provided in a higher resolution in order to see the locations and severity of the accidents particularly around the M25 junction 20.

Accessibility

It is noted that the closest bus stops from the site are approximately an 8-minute walk, 670m east of the main site access with a frequency of one bus every 30 minutes. Whilst 670m is an acceptable walking distance to bus stop, this distance is taken from the eastern edge of the site and doesn't represent the average or 'worst case' walking distance to existing bus stops. Furthermore, with a low frequency of bus service it is not considered to be an attractive service to staff occupying the site.

Policy Review

It is noted that the DfT circular 02/2013 has not been included within the policy review.

Parking and Access

The TA has assumed a split of the following across the access points;

All staff arriving to the film hub would utilise Access Point 3

All staff arriving to the industrial units, office, education facility and creche will utilise either Access Point 1 or Access Point 2, depending on which direction they arrive from.

NH seek clarification on how the three accesses will be managed ie how will the site ensure that only the correct users are using each existing access point?

The Transport Assessment sets out the total number of car parking spaces for each land use. The overall reduction in the maximum standard is welcomed to promote the use of sustainable travel to the site.

It is also noted that the existing site currently accommodates a children's farm which will be retained, and that no new trips are associated with this land use. It is therefore unclear why the children's farm is seeking additional parking if there are no new trips on the network, furthermore the number of car parking spaces sought are substantially above the maximum parking standard as set out in the table below.

Use	Description	Area (sqm)	Standard	TA	Maximum	% Reduction/Increase
A3	A3 Ancillary Café	383	1 space per 5 sqm plus 3 spaces per 4 staff	0	Unknown number of staff	N/A
B1a	B1a Office Space	6,303	1:30 sqm	108	210	-49%
B1a	Craft Workshop	11,254	1:30 sqm	204	375	-46%

B1c	Sound Stages	10,596	1:30 sqm	215	353	-39%
B1c	Support Building	12,518	1:30 sqm	196	417	-53%
B1c	Production Offices	5,587	1:30 sqm	136	186	-27%
B1c	Backlot	30,000	1:30 sqm	0	1000	N/A
D1	D1 Creche	422	1 space per 4 pupils			
D1	D1 Education Facility	2,159	1 space per 4 pupils	11	Unknown number of pupils	Unknown number of pupils
Sui Generis (D2)	Children's Farm	136	1:22sqm	50	6	709%

An overview of the car Parking Management Plan has been set out. This indicates that priority will be given to those who car share and that fines will be issued if they don't comply. NH would request to know how many of the car parking spaces will be dedicated for car sharers and how will this be split across the site? Clarification of whether enforcement of the EV spaces will be included in the Car Park Management Plan is also required.

The use of an electric minibus to provide access to The Grove, Watford Junction and the Town Hall is welcomed. The Transport Assessment sets out the frequency of services and indicates that the levels of services will be increased to Watford Junction. However, details of the services and frequencies are required to indicate the site's commitment to this service. A new shuttle service will be provided between the site and Kings Langley Railway Station. This will provide two services each hour during the morning and evening commuting periods, with no services provided between 10:00-14:00. Due to the shift patterns of staff using the site and in line with the existing shuttle services to the other locations. NH requests that services are also provided throughout the duration of the day (ie the off peak hours) and that all new services are provided from first occupation.

Travel Plan (TP)

NH welcomes the inclusion of a travel plan. NH note that There are no firm commitments to provide a docking area for the cycle hire scheme closer to the site.

There are aspirations to provide a docking area within the proposed site and discussions have taken place with the operator. Appendix A simply sets out all the costs options available without any commitment to fund any option.

The TA indicates that 'it is pertinent to note that the first service during the week is at 05:18 which arrives at the site at circa 06:25, with the last servicing operating from the site at circa 22:00. This therefore demonstrates that travelling by bus is a viable

option for future staff.' However, the distance from the edge of the site to the closest bus stop is 670m. To the middle of the site, it is considerably further, therefore this is not considered a particularly viable option.

The target of 15% reduction in single occupancy car use is indicated. This 15% reduction is relied upon as part of the assessment of the junctions within the Transport Assessment.

It indicates in the TP that the Travel Plan co-ordinator will discuss the results of the surveys with HCC officers within one month of each survey and review progress towards any agreed targets. NH request to be given an opportunity to be included in the review process to be assured that the TP targets are being met.

Trip Generation and Mode Share

It is noted that the floor areas used in the Transport Assessment come from the scoping note. However, the floor areas being applied for within this application are different in comparison to the scoping note that NH has reviewed. The floor areas are slightly higher for the office and education land use and lower for the craft workshops in comparison to those used in the scoping note. Can the Transport Assessment be updated to use the correct updated floor areas? Can you also please confirm what the anticipated trip generation for the other land uses being applied for are ie Sound stages, support building, production offices and backlot or are these considered ancillary and won't create trips in their own right?

The modal share has been adjusted to reflect that car use will be the predominant mode of travel to the site. However there does not seem to be any justification for the changes and why the mode shares used have been selected.

Effect on the Highway Network

The network peak hour of 07:00-08:00 and 17:00-18:00 have been identified. It is unclear why 08:00 -09:00 has not been identified as the network peak hour.

In Appendix O there is a slight mismatch between the distribution for the film hub and the commercial vehicles leaving the site, the proportion turning from the northbound off slip right at the roundabout is slightly different for each scenario yet it is understood that the distribution is supposed to be the same (28% vs 31%). Census data has been used to determine the destination trips. Based on the information presented in the Transport Assessment, the number of trips is not likely to have a material impact on the M25 junction 20.

National Highways have requested additional information be supplied by the applicant and so, at this time, we are unable to conclude a review of the impact this development proposal may have on the SRN. For this reason, we recommend that the planning authority does not determine this application for a period of 56 days from the date of this recommendation – that is 18 January 2023 or until National Highways submits an alternative response.

1.1.13.2 **Comments, dated 20 December 2022, confirming no objection to the proposed development**

National Highways Ref: 18422

Referring to the consultation on a planning application dated 10/11/22 referenced above, in the vicinity of the M25 Junction 20 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

a) offer no objection (see reasons at Annex A);

Highways Act 1980 Section 175B is not relevant to this application.¹

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the Town and Country Planning (Development Affecting Trunk Roads) Direction 2018, via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to planningse@nationalhighways.co.uk.

Annex A National Highways' assessment of the proposed development National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

In the case of this proposed site, National Highways is interested in the potential impact that the development might have upon the M25 Junction 20. We are interested as to whether there would be any adverse safety implications or material increase in queues and delays on the SRN during the construction and operation.

We have undertaken a review of the documents accompanying the outline planning application, particularly the Transport Assessment (TA) dated October 2022 and the 1 Where relevant, further information will be provided within Annex A.

National Highways Planning Response (NHPR 22-12) December 2022 Technical Note ((N11-JT-SD-Transport Response Note NH F1 (221208)) dated December as prepared on behalf of the applicant by Caneparo Associates.

The proposed development comprises the creation of a Film Hub and ancillary land uses including alterations to existing access points along Langleybury Lane.

Accident data

Accident data has been provided which covers the M25 junction 20. There does not seem to be any pattern of accidents at the SRN junction/slip roads and therefore it is deemed that there is not an accident issue on the SRN which would be exacerbated by the proposed development.

Accessibility

It is noted that the closest bus stops from the site are approximately an 8-minute walk, 670m east of the main site access with a frequency of one bus every 30 minutes. Whilst 670m is an acceptable walking distance to a bus stop, this distance is taken from the eastern edge of the site and doesn't represent the average or 'worst case' walking distance to existing bus stops. However, it is recognised that an electric minibus service will be implemented which will drop off within the site and therefore it may be that the majority of people travelling by bus would use this service, rather than a routine bus service.

Parking and Access

The TA has assumed a split of the following across the access points. All staff arriving at the film hub would utilise Access Point 3. All staff arriving to the industrial units, office, education facility and creche will utilise either Access Point 1 or Access Point 2, depending on which direction they arrive from. It has been noted that the operator of the film hub will ensure that any suppliers and staff associated with the site are notified in advance of the access arrangements to ensure that all vehicles arrive to the correct access point. Signage will also be erected at each access point to assist motorists in understanding which access they should arrive at. A Car Parking Management Plan ('CPMP') will be implemented at the site which will include details on car sharing, as well as information regarding the enforcement of the electric vehicle charging spaces.

Trip Generation and Mode Share

It is noted that based on census data approximately 66% of staff are expected to drive to the site. However, due to the nature of the site and that staff may carry heavy equipment and start in the early hours of the morning, it is expected that the car driver modal share will be slightly higher and therefore a 87.5% car driver modal share for the film hub element has been assumed based on data from industry experts Location Collective.

The trip distribution for the site is based on Google mapping/directions. Having assessed the impacts at M25 junctions 19, 20 and 21a National Highways are content that the proposed development will not materially affect the safety, reliability and/or operation of the SRN.

National Highways Planning Response (NHPR 22-12) December 2022

Travel Plan (TP)

NH welcomes the inclusion of a travel plan. NH supports the use of an electric minibus to provide access to The Grove, Watford Junction and the Town Hall. The Transport Assessment sets out the frequency of services and indicates that the levels of services will eventually be increased to include Watford Junction. A new shuttle service will be provided between the site and Kings Langley Railway Station throughout the day.

NH request to be given an opportunity to be included in the travel plan review process to be assured that the TP targets are being met.

Recommendation

National Highways raises no objections based on the information presented with the planning application and through subsequent exchange of supplementary information through the applicants consultant team.

Standing advice to the local planning authority

The Climate Change Committee's 2022 Report to Parliament notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 73 and 105 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 104 and 110 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of PAS2080 promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.

1.1.14 Herts Footpath Section: [Information only]

I would draw the applicants attention to the County Councils Rights of Way Improvement Plan (ROWIP) suggestion list. The County Councils ROWIP is a requirement of the Countryside & Rights of Way Act 2000 and is a related document of the Local Transport Plan .

I have noted that a verge or field edge path has been identified. This would deliver a safer off road link for vulnerable non-motorised path users.

1.1.15 Herts County Council – Archaeology: [No Objection]

1.1.15.1 **Comments, dated 1 December 2022 objecting to the proposed development:**

Thank you for consulting us on the above application.

The proposed development site comprises the former Langleybury Estate and Home Farm. Langleybury House [Historic Environment Record No 11391] is an early 18th century Grade II* Listed country house that was in use as a school between 1947-96. It is set within the remains of its former parkland and formal gardens [HER 12721], which were laid out in the mid 19th century. Associated buildings include the Grade II Listed Stables, to the south-west of the house, the notable late 14th century aisled barn, built by abbot John Moot [HER 4851], which is Listed Grade II, the Home Farm [HER 11393], and the associated 1-3 Old Farm Cottages (also Listed Grade II), which used to house farm workers.

We have previously commented on pre-application advice request 22/1423/PREAPP (letter dated 16th September 2022), noting that the proposed development area is of very substantial size, and that it is in a situation favourable to settlement. It therefore has a high potential to contain significant archaeological remains. The proposed development may have an impact upon undesignated heritage assets, some of which may be of regional significance.

We recommended that should a planning application be submitted for this proposed development it should be supported by:

- The existing archaeological desk-based assessment prepared by Lichfields: Lichfields, Langleybury Film Hub Archaeological Desk-Based Assessment, September 2022
- The existing geophysical survey report prepared by Magnitude Surveys, Geophysical Survey Report Langleybury House, Hertfordshire, July 2022
- Any existing assessment of the impact of the proposed development on the historic built environment and designed landscape.

In addition, we recommended that the following works be carried out (to meet NPPF, para 194), and the results also submitted:

- An archaeological geophysical survey of additional areas of the overall development site, as appropriate
- An archaeological trial trench evaluation to test the geophysics results and quantify the archaeological resource.

- If not already in existence, an assessment of the impact of the proposed development on the historic built environment and designed landscape.

As per our pre-application recommendations, the Archaeological Desk-based Assessment prepared by the applicant's archaeological consultant (Lichfields), and the geophysical survey report prepared by Magnitude Surveys are included in the Environmental Statement (N1 – N4) submitted. I also note the submission, within the ES, of The Langleybury Estate, Kings Langley, WD4 8RP, Historic Buildings Report for Ralph Trustees Limited, Douglas Insall Associates, October 2022).

It is stated (Planning Statement. Archaeology):

5.124 With regard to below ground archaeology, Chapter N of the ES addresses this matter and is informed by a detailed Desk Based Assessment (DDBA) and a separate Geophysical Survey Report.

5.128 Further to this, a programme of trial trenching informed by a Written Scheme of Investigation (WSI) is to be agreed with the County Archaeologist and will be undertaken to allow a full assessment of archaeological potential to be made by the LPA. This assessment will be provided prior to the determination of the planning application.

ES Chapter N – Archaeology re-iterates this undertaking.

I can inform you that this office has agreed a Written Scheme of Investigation for archaeological trial trench evaluation with the applicant's archaeological consultant (Lichfields).

The trial trenching is currently being carried out by Wessex Archaeology, and is likely to be completed this month.

However, we will not be in a position to provide the Planning Authority with informed advice as to the impact of the proposal on the historic environment, or detailed recommendations as to the extent and nature of the archaeological mitigation that will be required, until a detailed report on the results of the evaluation has been prepared and submitted to the Planning Authority, and to this Office.

I therefore recommend that the planning application is not determined until this report has been submitted.

Please do not hesitate to contact me should you require any further information or clarification.

1.1.15.2 Comments, dated 14 March 2023, advising objection overcome:

Thank you for re-consulting us on the above application.

Further to our advice (Daniel Phillips, dated 14th March 2023), sent in response to your previous re-consultation on this application, I can advise you that we have no specific comments to make on the additional plans, documents and addendum that have now been submitted.

I do, however, note that in its comments dated 8th September 2023, Historic England have now advised you "Taking into account the reduction in the level of harm, the heritage benefits of repairing the mansion and historic garden features, we would not object to these proposals. It is for your authority to weigh the harm against the public benefits at this point. '

I shall not reproduce my colleague Daniel Phillips' comments in full, but confirm that the pre-determination archaeological trial trench evaluation of the site in late 2022 was carried out to a high standard, and the report that has been submitted to you is satisfactory. No archaeological remains of significance were identified.

We are now satisfied that the likelihood of encountering below ground heritage assets of significant archaeological interest is low, and confirm that we would not require any further below ground archaeological investigations should planning consent be granted.

However, I repeat our previous recommendation, that the following provisions be made, should you be minded to grant consent:

- 1.the archaeological monitoring of all works related to the listed buildings and curtilage listed buildings associated with the development.
- 2.a contingency for the rapid investigation and recording of any remains encountered during the monitoring programme.
- 3.the analysis of the results of the archaeological work with provisions for the subsequent analysis and publication of results, and the production of a report and archive.

I believe that these recommendations are both reasonable and necessary to provide properly for the likely archaeological implications of this development proposal. I further believe that these recommendations closely follow para. 205, etc. of the National Planning Policy Framework 2021, relevant guidance contained in the National Planning Practice Guidance, and Historic Environment Good Practice Advice in Planning Note 2:

Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015).

In this case three appropriately worded conditions on any planning consent would be sufficient to provide for the level of investigation that this proposal warrants. I suggest the following wording:

A No demolition/development shall take place/commence until an Archaeological Written Scheme of Investigation has been submitted to and approved by the local planning authority in writing. The scheme shall include an assessment of archaeological significance and research questions; and:

1. The programme and methodology of site investigation and recording
2. The programme for post investigation assessment
3. Provision to be made for analysis of the site investigation and recording
4. Provision to be made for publication and dissemination of the analysis and records of the site investigation
5. Provision to be made for archive deposition of the analysis and records of the site investigation
6. Nomination of a competent person or persons/organisation to undertake the works set out within the Archaeological Written Scheme of Investigation.

B The demolition/development shall take place/commence in accordance with the programme of archaeological works set out in the Written Scheme of Investigation approved under condition (A)

C The development shall not be occupied/used until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under condition (A) and the provision made for analysis and publication where appropriate.

1.1.16 Herts County Council – Lead Local Flood Authority – External consultant response:
[No Objection]

Summary

- 1 Hybrid application for the creation of a Film Hub to include detailed approval for demolition of a number of existing buildings including children's farm buildings and change of use of Mansion House and Aisled Barn for filming and the construction of a cafe within the Walled Garden, new car parking area to north of site, alterations to existing access points along Langleybury Lane, change of use of the L Shaped Barn (to multi purpose use including cycle hub, showers and vehicle storage) and change of use of ground floor of the existing Laundry to reception facility, together with outline planning approval (matters reserved: Scale, Layout, Appearance and Landscaping) for change of use of site to a Film Hub to include Craft Workshop buildings, Sound Stages, Support Workshops, Production Offices, Backlots, Film and Television Training Facility Building, Offices, Ancillary Buildings, parking areas and relocation of Langleybury Children's Farm including new farm buildings. Alterations to existing cycle path and pedestrian network within the site, to include provision of a new pedestrian/cycle access within the site to the A41.

Conclusions/Observations

Whilst we have retained most comments for consistency with our previous responses, the applicant has provided sufficient information for outline planning.

1. SuDS and drainage will be dependent on a 1 in 1 year storm event surface water sewer capacity. Events exceeding this are anticipated to discharge to two attenuation basins (1no. in Catchment 2 and 1no. in Catchment 3). Basins are understood to discharge via infiltration up to a 1 in 30-year climate change standard. Events exceeding this are anticipated to include unrestricted overtopping of basin capacity. (Phase 1 full planning is to be fully discharged to ground in Basin 2).
- 1.2 Applicant has provided a summary of proposed design measures, which are considered suitable for outline, to manage seepage and scour of downstream fields. The LPA would expect to see quantified details of this as the application (and detailed design) progresses. We recommend that this be conditioned.
2. Based on the provided layout, proposed wetland features appear not to have a profile that resembles wetlands. However, we understand that these are to be re-established based on previous extents. No further comments at this stage.
3. SuDS proposals include for various surface water swales. A descriptive response as to the function of proposed swales has been provided and is considered suitable for outline planning. We recommend that a standard condition for a detailed surface water management scheme would capture the detailed design of this as the application progresses to full/conditions.
4. We note that key areas of parking are to be formed as permeable paving with infiltration. Further localised infiltration testing has been undertaken to confirm viability. We recommend that a standard condition for a detailed surface water

management scheme would capture the detailed design of this as the application progresses to full/conditions.

5. Applicant has demonstrated a combination of a safety factor of 5 and a half drain down time within 24 hours up to the 1 in 100 year + climate change event for proposed infiltration basins. No further comments at this stage.

6. A full detailed drainage plan including location of SuDS measures, pipe runs and discharge points will be required at full planning. An appropriate level of details and controls should be provided, including full Micro Drainage (or equivalent) in accordance with requirements. We note that this has been provided for Phase 1 full planning areas.

7. A more detailed assessment of Catchment 1 has been provided based on updated localised infiltration testing and this is considered suitable for outline planning. No further comments at this stage. It is noted that the most recent Catchment 1 Porous Paving Calcs are currently in a separate document to the Outline FRA and Drainage Statement.

8. Whilst reuse of the cistern for watering gardens is a positive measure and a vision of how this will operate has been provided, the system is subject to further design and refinement. We recommend that a standard condition for a detailed surface water management scheme would capture the detailed design of this as the application progresses to full/conditions.

1.1.17 Herts County Council – Minerals and Waste Team: [No Objection]

1.1.17.1 **Comments, dated 7 December 2022, objecting to the proposed development:**

I am writing in response to the above pre-planning application insofar as it raises issues in connection with minerals or waste matters. Should the District Council be minded to permit this application, a number of detailed matters should be given careful consideration.

Waste

The proposed development as described above will result in the production of additional waste to be managed within the county, arising from the ground works and construction stages and proposed usage. As a result, waste matters will need to be considered as part of the proposed development and waste prevention, re-use, recycling and recovery options employed to minimise waste requiring disposal, in line with the waste hierarchy.

Government policy seeks to ensure that all planning authorities take responsibility for waste management when determining applications at a district/borough level. In particular, the Waste Planning Authority wishes to highlight the content of the National Planning Policy for Waste, which was published by government in October 2014. This is of relevance to local planning authorities as it provides the following guidance that relates to the determination of non-waste planning applications:

‘When determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that:

- the likely impact of proposed, non- waste related development on existing waste management facilities, and on sites and areas allocated for waste management, is acceptable and does not prejudice the implementation of the waste hierarchy and/or the efficient operation of such facilities;

- new, non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities with the rest of the development and, in less developed areas, with the local landscape. This includes providing adequate storage facilities at residential premises, for example by ensuring that there is sufficient and discrete provision for bins, to facilitate a high quality, comprehensive and frequent household collection service;
- the handling of waste arising from the construction and operation of development maximises reuse/recovery opportunities, and minimises off-site disposal. This includes encouraging re-use of unavoidable waste where possible and the use of secondary aggregates and recycled materials where appropriate to the construction. In preparing planning applications applicants are urged to pay due regard to policies within the adopted Hertfordshire County Council Waste Core Strategy and Development Management Policies Development Plan Document 2012 which forms part of the Development Plan. In particular the following policies are of relevance and applicants should ensure their objectives are met by way of details submitted with the application(s):
 - Policy 1: Strategy for the Provision for Waste Management Facilities. (This is relates to the penultimate paragraph of the policy only);
 - Policy 2: Waste Prevention and Reduction: &
 - Policy 12: Sustainable Design, Construction and Demolition.

In line with Policy 12, the Waste Planning Authority would expect the planning application to be supported by a Site Waste Management Plan (SWMP), which aims to reduce the amount of waste, produced on site and should contain information including types of waste removed from the site and where that waste is being taken to.

We are pleased to see that a Waste Strategy and Site Waste Management Plan (SWMP) (dated October 2022) has been submitted alongside this application.

The submitted SWMP provides sufficient and necessary details the Waste Planning Authority expects to see included. The SWMP provides a high level of information relating to the estimated amount of demolition waste to arise also detailed with EWC codes. Estimated amount of waste arising from the construction is also included, along with waste management proposal. A table for recording actual amount of waste arisings is also set out.

Details of Waste carriers and Waste management facilities for where waste is proposed to be sent should also be provided.

SWMP's are live documents which should be updated periodically throughout the duration of a project. Actual waste arisings should be recorded in the SWMP as the project progresses, as well as details of where waste is taken to.

Policy 12: Sustainable Design, Construction and Demolition of the Waste Core Strategy and Development Management Policies (2012) document under which the requirement for a SWMP has arisen, requests that completed SWMPs are submitted to the Waste Planning Authority to collate the waste data to assist with waste planning and monitoring by understanding the quantities of construction and demolition waste that is being produced which requires managing.

As a reminder, the SWMP must be available to any contractor carrying out work described in the plan and should be forwarded to the Waste Planning Authority when completed. There is no need to provide monthly progress; instead the final figures at the completion of the project would be sufficient. These should be sent to the Spatial

Planning and Economy Unit at the above postal address or by email to: MineralsandWaste@hertfordshire.gov.uk

Minerals

In relation to minerals, the site falls entirely within the 'Sand and Gravel Belt' as identified in Hertfordshire County Council's Minerals Local Plan 2002 – 2016. The Sand and Gravel Belt is a geological area that spans across the southern part of the county and contains the most concentrated deposits of sand and gravel throughout Hertfordshire. It should be noted that British Geological Survey (BGS) data also identifies superficial sand/gravel deposits in the area on which the application falls.

Adopted Minerals Local Plan Policy 5 (Minerals Policy 5: Mineral Sterilisation) encourages the opportunistic extraction of minerals for use on site prior to non-mineral development. Opportunistic extraction refers to cases where preparation of the site for built development may result in the extraction of suitable material that could be processed and used on site as part of the development.

Policy 5 further states that:

The County Council will object to any development proposals within, or adjacent to areas of potential mineral resource, which would prevent, or prejudice potential future mineral extraction unless it is clearly demonstrated that:

- i. the land affected does not contain potentially workable mineral deposits; and/or
- ii. there is an overriding need for the development; and
- iii. the mineral cannot practically be extracted in advance.

The Minerals Planning Authority therefore object to the proposed development and request a site investigation and evaluation by way of a Minerals Resource Assessment (MRA) to be undertaken in order to assess the potential for workable mineral deposits underlain at the site and to avoid the possibility of mineral sterilisation (please refer to Section 5(a) of the adopted Minerals Consultation Areas SPD).

It should be noted that if the full resource is to be extracted, there may be the need for a separate mineral planning application and potentially a separate EIA. If opportunistic extraction is undertaken the relevant issues could be covered within an EIA supporting the proposed development.

However, if the mineral resources are proposed to be left, justification of departure from policy must be demonstrated and this may also result in an objection from the county council.

1.1.17.2 Following receipt of these comments further information was submitted which Herts Minerals and Waste made the following comments removing their objections in comments, dated 10 January 2023:

After consideration of the submitted Minerals Resource Assessment (MRA) dated September 2022, the County Council, as the Minerals Planning Authority recognises the limitations to prior extraction of the site due to borehole evidence indicating low quantity and quality of mineral and constrains around existing residential development.

Given this, the County Council, as the Minerals Planning Authority, insists that the applicant explores further the opportunistic use of the deposits across the site should permission be granted. Opportunistic use of minerals will reduce the need to transport sand and gravel to the site and make for sustainable use of these valuable resources.

We would now withdraw our earlier objection subject to the recommendation that the following condition be applied, if officers are minded to approve:

Condition: Prior to the commencement of development/excavation or ground works in each phase of the development a minerals recovery strategy for the sustainable extraction of minerals shall be submitted to and approved in writing by the Local Planning Authority, in accordance with the submitted Mineral Resource Assessment dated September 2022. Thereafter, the relevant phase or phases of the development must not be carried out other than in accordance with the approved minerals recovery strategy. The minerals recovery strategy must include the following:

- a) An evaluation of the opportunities to extract minerals (sand and gravel, hoggin and other soils with engineering properties); and
- b) A proposal for maximising the extraction of minerals, providing targets and methods for the recovery and beneficial use of the minerals; and
- c) a method to record the quantity of recovered mineral (re-use on site or off-site).

REASON: In order to prevent mineral sterilisation, contribute to resource efficiency, promote sustainable construction practices and reduce the need to import primary materials in accordance with Policy 5 of the adopted Hertfordshire Minerals Local Plan Review and the National Planning Policy Framework.

1.1.18 Herts County Council – Property Services: [No objection]

I refer to the above mentioned application and am writing in respect of planning obligations sought by Hertfordshire County Council towards early years; primary and secondary education; SEND, library, youth, waste and HFRS services, to minimise the impact of development on HCC's services for the local community.

Planning obligations should only be sought for residential developments that are major development, which is defined in the National Planning Policy Framework as development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. Therefore we will not be seeking financial contributions.

However, you may receive separate comments from the Highways Unit.

PLEASE NOTE: Please consult the Hertfordshire Fire and Rescue Service Water Officer directly at water@hertfordshire.gov.uk, who may request the provision of fire hydrants through a planning condition.

Should you require any further information, please do not hesitate to contact the Growth & Infrastructure Unit.

1.1.19 Herts County Council – Public Health: No comments received.

1.1.20 Hertfordshire County Council – Forward Planning: No comments received.

1.1.21 Hertfordshire County Council – Ecology: No objection subject to conditions.

Thank you for consulting Hertfordshire Ecology on the above application. These comments are in response to a further consultation [9 August 2023] as a result of significant amendments and additional information submitted to TRDC.

1. A bat report (roost characterisation, presence / absence surveys) Sept 2023 has now been provided. Previous bat surveys (PEA and bat report) identified the presence of roosts and buildings with a range of potential for bats and recommended further surveys. These were needed to fully inform mitigation and compensation. Table 1

summarises the survey results from all relevant buildings. Roosting was confirmed by emergence or re-entry surveys in B1, B2, B3, B4 and B8. Only single or very low numbers of bats appear to have been recorded leaving / returning to these buildings. All were considered to be day roosts of pipistrelle species and possible brown long eared. I would consider these roosts to be of low conservation significance. No other building surveys showed any signs of active use.

I am satisfied the surveys are thorough and reliable, and are able to fully inform the proposals. Demolition of Buildings B14, B16, B17, B18, B21, B22 and B23 are considered to represent a negligible risk to bats.

It is acknowledged a licence will be required for works to proceed where active roosts are present. The report states 4.11 Specific mitigation details for Site will be specified during the Licence application process and will be guided by a Suitably Qualified Ecologist. However likely mitigation is outlined, and includes bat boxes, supervised removal of features likely to support bats, replacement of roosting opportunities, anti-snagging felt, and monitoring. I consider all of these to be suitable. On this basis I have no reason to consider a licence would not be issued.

However, for the record, I advise a copy of the proposals for bat mitigation, along with any plans showing locations of boxes, spaces, integrated boxes etc. should be submitted to the LPA as a Condition of approval.

2. In respect of Biodiversity Net Gain, a full Biodiversity Metric V4 has been submitted. This enables proper scrutiny of the assessments and calculation.

A detailed botanical survey was undertaken on 22nd June 2023 to confirm correct identification of grassland habitats, and the results are provided within a new report. Quadrat size was larger than the revised UK Habitat Classification requires but I suspect that is because of originally misleading UK Habitat guidance. In any event, it is clear that essentially all of the fields surveyed are agriculturally improved and / or species poor, although one small field in the SE corner of the site was considered to be Other Neutral Grassland (ONG), with a slightly better species-richness. I am satisfied the results are reliable and representative of the grasslands present on site. Consequently, the majority of the grassland baseline in the metric is identified as modified grassland. I have no reason to consider all other baseline assessments are not accurate.

The low lying easternmost grassland was originally considered to be grazing marsh. There is no historic map evidence to suggest this area was true marsh although it may naturally have been damper. The MAGIC description that it was a priority habitat grazing marsh is wrong.

Habitat creation on-site is proposed largely by creating ONG for the majority of the remaining open grasslands. There is an intention to create a marshy grassland (Lowland meadow) in the valley bottom, although this is not reflected in the metric, so presumably this will be a form of poorly drained ONG. A higher scoring lowland (wet) meadow community could be considered if the ground is wet enough and it can be successfully established. This proposal is described in the Biodiversity Impact Assessment and shown on the latest Masterplan both of which should, therefore, be consistent with the metric.

Despite a reduction in area of open grasslands at Langleybury from c.51ha to c.39ha largely as a result of built development, the creation of ONG for most of the remaining grassland increases all grassland BU scores from c.222 BU to c.277 BU. A range of

smaller creation and enhancements – such as implementation of a woodland management plan - also generate additional BU compared to the present. I consider that grassland creation and subsequent management by grazing and or hay cutting where appropriate for some areas, is achievable on this site assuming appropriate access to livestock etc.

The ability to secure the practical management required to achieve the landscape management proposals is critical to the long term delivery of BNG and associated benefits. This is best achieved using a local farming enterprise capable of providing the long term capability required to achieve this. On this basis, I consider the proposals for enhancements are deliverable.

I consider the site assessments have enabled accurate entries into the metric, which I consider is reliable. The Headline Results show that the development will achieve an on-site increase in Habitat Units of 28.17%, an increase in Hedgerow Units of 85.24% and an increase in River Units of 102.67%. The Trading rules have been satisfied.

On this basis, BNG in excess of 10% has been achieved for this development.

If the application is approved, a Biodiversity Gain Plan should be required. submitted as a Condition. In this respect, I acknowledge the Outline Nature Recovery Plan (May 2023) which presents broad objectives to manage the site for biodiversity. However, a Gain Plan will need to present details of management prescriptions for each of the principle habitats (and presumably veteran trees and other ecological features) proposed to be delivered in the metric / Masterplan, in order to demonstrate how BNG can be achieved in practice.

3. The development will by default introduce significant artificial light to the western side of the site, which is not currently present, however well controlled. I have no doubt that light spill itself (unwanted illumination at ground level) can be controlled by use of appropriately angled luminaires, and this is demonstrated on light spill plans. However, Langleybury Lane is a prominent location at the top of the western side of the Gade Valley and illuminating the development here will further degrade the existing rural-fringe environment already impacted by two motorway routes and Leavesden film studios on the other side of the valley. If light spill is controlled, intrusion of lighting will be generated by two other potential causes:

Glare from the luminaires themselves. Even if horizontal, unless they are embedded within the lamp hood, or cowling is also used to cut out their visibility from the site or beneath – they are likely to be visible from the valley bottom.

The visibility of the illumination itself (particularly when there is significant particulate matter in the atmosphere, such as rain or mist etc) and any reflected illumination, both of which will also generate a sky glow when observed from a distance. No lighting is currently present along Langleybury Lane, so this is an intrusion into what is a moderately darker landscape in the context of open land to the west of Hunton Bridge and Abbots Langley.

Use of lighting for film production areas on the skyline adjacent to Langleybury Lane could generate substantial light pollution on occasion, although such impacts from film production are not permanent and limited in extent. As such, the Lighting Assessment does evaluate the effects of production lighting as well as permanent lighting. The impacts from both must be considered. I note the intention to monitor lighting, but of what, to whom and why? Against what is this to be measured, to whom is it accountable and what are the consequences if levels are exceeded? More detail is needed for this to be meaningful. Indeed, *By designing General Lighting to have an upward*

light ratio of less than the most stringent criterion of 2.5 %, it can be ensured that there is headroom to accommodate additional upward light associated with Production Lighting. (Lighting Assessment 8.5) This would seem to allow obtrusive lighting to be accepted whilst apparently staying within acceptable overall limits. However, if this activity generates light pollution, the overall success of limiting intrusive lighting will be reduced.

Some proposed lighting will certainly reduce the impact of existing bad lighting where it is needed to be replaced, and the proposed luminaire designs appear to limit light pollution in being horizontal, downward facing and largely enclosed within protective hoods. Nevertheless, in addition to avoidance measures, additional landscaping to deflect visible impacts should be considered.

Whilst the lighting assessment and proposals have much to commend, I remain concerned about the proliferation of light into the darkest areas of the site (see Appendix A Light Map) which are currently not subject to any lighting at present. Consequently, I do not agree with the statement (Lighting Assessment 8.6) *lighting will be in fitting with its surroundings, thus preserving the surrounding nightscape*. Whilst the existing ecological interest of the site does not justify a refusal of the proposals on the grounds of lighting impacts, (despite the suggested high value of the site for bats), this should not justify the intrusion of additional external light. More detail regarding design is required to ensure there are meaningful limits and controls to reduce the impacts as far as possible; indeed, this is proposed within the Lighting Assessment (10.18), should the application progress to the next stage.

The lighting management plan during construction does seek to limit light pollution and would appear to be acceptable, given the limited expectation of use of some taller lighting only during construction.

TRDC will need to be satisfied that these issues have been – or will be – adequately addressed to limit impacts at this very visible and strategic location.

4. The orchard proposed adjacent to walled garden near around main house re-creates an historic feature, and is supported.

5. Whilst a significant area of the open grassland at Langleybury will be lost to built development, there will also be a significant reduction of views east across the parkland and Gade valley from the west, and visible on the skyline from the east. There is now, however, a slightly increased distance between building complexes which reduces the effective loss of parkland and views along western boundary, although this will be subject to further tree planting.

6. Protection of veteran trees within the existing parkland and as part of South Site development (backlot etc.) is supported.

7. The parkland areas have been identified as either Private Access – grazing parkland, or Public Access, Parkland. If the latter will not be grazed, how will the proposed ONG be maintained? Grazing with appropriate livestock can be undertaken with public access, although sheep tend to be more vulnerable because of irresponsible dog owners. The Rookery is also proposed for public access. How will disturbance associated with increased access be controlled?

8. The area was originally not considered to be parkland habitat due to the intensive grazing, lack of deadwood and grassland structure, so it does not meet a Habitat of Principle Importance. Whilst this is not an unreasonable assessment given its rather degraded character, the site is clearly of parkland origin and retains good evidence of

a wood pasture character with scattered mature trees over grassland. Historic maps show the majority or all of the existing area is included within the old parkland, other than the strip along the southern edge of the site. Parkland can even be reverted to arable or amenity use with scattered trees according to its UK Habitat description. The site still supports scattered clumps of trees within open grassland albeit largely improved, along with some veteran trees, and is apparently undergoing regenerative farming. A parkland at least since the Mansion was established, restoration and enhancement of parkland / wood pasture should therefore be a key priority for the majority of the site.

9. Historic ponds are present; it is unlikely they will be used as watercress beds as suggested, given the relatively intensive management this would require.

10. Rookery Wood has clearly been subject to planting, but I consider it could have ancient origins given historic map evidence. Whilst meeting priority habitat status, in my view none of the woodland is of regional importance as suggested.

I note Brickfield Spring is identified as possibly subject to increasing pressure from the development having a PROW through it. However, it is proposed to open access routes through Rookery Wood; presumably this will have similar results, although this issue is recognised. Regrettably, there is a reference to lighting in the wood to facilitate access – this should be avoided.

11. 20 older trees have been documented with varying extents and types of characteristics. 11 are considered veteran and nine notable. The oldest is a large Cedar of Lebanon which dates from 1672; an oak dates from around 1742, beech from 1750 and 1778, whilst the youngest are beech from 1870. Most are associated with Rookery woodland rather than open parkland. Some works are proposed to some the veteran trees to help maintain their presence, but none are proposed for removal as a result of the development.

12. A reptile survey for the main site was undertaken. Reptile habitat was generally considered to be poor largely due to the intensity of grazing. No reptiles were recorded from surveys in 2022 and it was concluded they are unlikely to be present. Precautionary recommendations are provided for any vegetation clearance works and are acceptable and should be followed. Proposals for enhancements in the form of habitat enhancements and hibernacula are also given.

13. The site is considered to be of negligible value for Great crested newts.

14. There was no evidence of recent badger activity other than possible snuffle holes within Rookery Spinney, but a disused sett was recorded. Consequently, the site should be subject to a walkover survey to confirm the position prior to works taking place. This guidance should be included within a CEMP.

15. An invertebrate scoping report assessed potential invertebrate habitats and some sampling. Grasslands were of low suitability for any significant invertebrates. Mature trees have the potential for deadwood invertebrates. Suggestions were made for providing enhancements, largely through reducing the grazing pressure.

16. The site is considered to be of negligible value for invertebrates; I find this a little surprising given the identification of veteran trees which is one of the key important habitats for insects, particularly associated within a parkland setting, although I acknowledge there are relatively few veteran trees and most of the grassland is improved. However, it is not reasonable to state invertebrates will decline further, as past

management will have already affected their status on site and the current regenerative farming should improve conditions for them. Further degradation of veteran trees will in fact provide more deadwood features, unless these are removed for safety reasons.

17. The future habitat extent and quality is expected to remain the same in the absence of development (E4.39). Whilst this is not unreasonable, it is also clear that agri-environment schemes, regenerative farming and a potential BNG receptor site role could all benefit the ecology of this site, if pursued, without the need to develop other parts of site. In this respect, the implication that only the proposed development is required to achieve this is not true, given the existing management regime could potentially change.

18. Impacts of Climate Change are not directly attributable to any particular development issue; this will affect all environments and developments everywhere. However, unless any given development is specifically proposed to address this (e.g. a solar farm), the wider issues remain and should be considered to reduce / future proof impacts accordingly.

19. The proposals for a Construction and Environment Management Plan is supported. The proposed lighting strategy should be independent of the CEMP, as this will impact on residual effects of development, not merely its construction.

20. The Green and Blue Infrastructure strategies are supported, although further detail will be required regarding site management, especially if grazing is to be removed from publicly accessible areas. This would limit the ecological diversity of the site and must be addressed. Sensitive grazing management is the most ecologically appropriate management tool for the valley floor and slope grasslands, and would have been the traditional management for most if not all of the grassland. Areas only to be cut for hay should be identified, although I am not satisfied such wetter grasslands would be suitable, depending on how permanently wet they were.

21. Proposed hedgerows should not detract from the historic parkland character of the site if designed with this landscape character in mind.

22. Highlighting impacts from livestock on new plantings should not detract from this management; it would be standard practice to protect any new trees etc. from grazing / browsing livestock, as necessary. This always was and still is simply a matter of basic estate management rather than a problem. The potential issues associated with increasing public access in respect of grassland and wetland habitats are, however, correct.

23. A LEMP is proposed and supported although this may overlap considerably with a Biodiversity Gain Plan. As suspected it is proposed to manage some areas for hay, although aftermath grazing would not be possible if livestock are to be excluded from such areas. It is not clear as to the rationale for 'agricultural' management as opposed to other management; the whole open parkland should aim to be managed in a traditional manner given its historic parkland landscape and ecological origins and current integrity. Any future landscaping buffers would also have to respect this; bunding to replace fencing creates introduces an equally artificial feature and intrusion into the landscape despite any contributions to BNG, particularly when it is provided to reduce harmful impacts in the first place. Such details will need further consideration.

24. No comments are offered on the impact on the landscape or merits of any landscaping. However, there are some considerations which appear pertinent:

The *Langleybury and Grove Development Brief (June 2012)* to support the local plan, includes the statements:

“The zones of visual influence for both Langleybury and The Grove are substantially contained by natural landscape features. The Langleybury Site, whilst more prominent in the landscape, is seen in the context of significant detracting elements from the M25 to the poor quality former school buildings on the Site.”

“Development at Langleybury should avoid further encroachment on, or preferably remove detracting elements from views from the east of the Site from within and across the Gade Valley”

“Development proposals should seek to restore the Site to a more natural appearance in views from the Grand Union Canal to create a softer more natural appearance on the skyline”

Whilst acknowledging the removal of school buildings which clearly detract from the parkland landscape (although they are associated with the existing building complex rather than more visible open parkland areas), they will be replaced by new buildings which:

Will cause significant encroachment onto the currently large expanse of open parkland away from the existing building complex;

Are seen on the skyline when viewed from the valley bottom westwards (ES document front covers);

Will impact on the wider valley when viewed across the valley from the east;

Will generate a substantial impact on views across the valley eastwards from Langleybury Lane. Much of the development will be adjacent to this part of the lane, removing the existing parkland and preventing any views (other than the small valley feature although this is proposed for tree planting towards the Lane) of the remaining parkland or across the whole valley.

Consequently, the LPA will need to consider the extent to which the proposals meet the Brief. The impact Leavesden already causes in a similar situation is clearly visible from Streetview. The weight this issue should be given needs to be considered in relation to other impacts resulting from the proposals, which are presented as beneficial.

25. The GI approach to areas of public access does not reflect any historic significance of land management, but more recent agricultural fencing for livestock management purposes. There is no sound rationale for this division into the future, other than restricting access to the rear of the backlot area under the guise of parkland restoration. Parkland restoration should clearly be for the whole site as appropriate as this would bring multiple benefits, and not be limited by inappropriate fencing, the location of which can be redesigned accordingly to better suit management and landscape considerations.

26. On the basis of the above, I do not consider there is sufficient ecological interest present to represent a significant constraint on the proposals. Despite the loss of open parkland, a minimum of 10% BNG has demonstrated for the site and significantly exceeded. This is principally due to proposed improvements to the ecological quality of the remaining grasslands, which are considered to be achievable. Given the impact on the site generally, if approved I consider further details regarding landscaping to

reduce lighting and visual impacts will be necessary, consistent with the site's important parkland history, as will a detailed lighting scheme and a Biodiversity Gain Plan as conditions of approval.

1.1.22 Herts and Middlesex Wildlife Trust: [No Objection]

1.1.22.1 Comments, dated 15 November 2022 objecting to the proposed development:

Application must demonstrate a measurable net gain to biodiversity in accordance with NPPF.

In accordance with NPPF, BS 42020, and The Environment Act 2021 the following information should be provided to demonstrate compliance with these documents

- Net gain to biodiversity (habitats) should be adequately and objectively demonstrated by

application of the Natural England Biodiversity Metric.

The NPPF states:

174. Planning policies and decisions should contribute to and enhance the natural and local environment by:

d) minimising impacts on and providing net gains for biodiversity

The object of an ecological report submitted in support of a planning application should be to demonstrate how the proposals are capable of being consistent with NPPF and local planning policy and deliver a measurable biodiversity net gain.

BS 42020 states:

'8.1 Making decisions based on adequate information

The decision-maker should undertake a thorough analysis of the applicant's ecological report as part of its wider determination of the application. In reaching a decision, the decision-maker should take the following into account:

h) Whether there is a clear indication of likely significant losses and gains for biodiversity.'

A Natural England Biodiversity Metric must be completed before a decision can be made. It must show a biodiversity net gain of >10% to be compliant with planning policy.

All habitats selected in the metric must be justified with data, e.g. botanical surveys with relative abundances and quadrat photographs. Habitats selected must correlate with UK Habitats definitions.

All condition assessment sheets for different habitats must be supplied with evidence to justify why they do not meet criteria.

1.1.22.2 Comments received confirming objection has been overcome:

Subsequent to our previous objection the applicant has submitted a biodiversity metric which demonstrates a biodiversity net gain. In order to secure these net gains in perpetuity, a condition should be applied to the decision. A suitable condition is:

'Development shall not commence until a biodiversity net gain management plan (BNGMP) has been submitted to, and approved in writing by, the local planning authority. The content of the BNGMP shall ensure the delivery of the agreed number

of units as a minimum (347 hu, 20 hrwu, 5.56 ru) to achieve a biodiversity net gain and include the following.

- a) Description and evaluation of habitat parcels to be managed, cross referenced to individual lines in the metric.
- b) Maps of all habitat parcels, cross referenced to corresponding lines in the metric.
- c) Appropriate management options for achieving target condition for habitats as described in the approved metric.
- d) Preparation of an annual work schedule for each habitat parcel (including a 30 year work plan capable of being rolled forward in perpetuity).
- e) Details of the body or organisation responsible for implementation of the plan.
- f) Details of species selected to achieve target habitat conditions as identified in approved metric.
- g) Ongoing monitoring plan and remedial measures to ensure habitat condition targets are met.
- h) Reporting plan and schedule for informing LPA of condition of habitat parcels for 30 years.

The BNGMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery.

The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the BNGMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the approved scheme.

1.1.23 Natural England: [No objection]

1.1.23.1 **Comments raising no objection to the proposed development:**

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Summary of Natural England's Advice:

No objection

Sites of Special Scientific Interest Impact Risk Zones

The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on "Development in or likely to affect a Site of Special Scientific Interest" (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website.

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

1.1.23.2 Comments, dated 4 September 2023, on the amended scheme raising no objection:

Based on the plans submitted, Natural England considers that the proposed development will not

have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

Natural England's generic advice on other natural environment issues is set out at Annex A.

Other advice

Priority habitats and Species

Priority habitats and Species are of particular importance for nature conservation and are included

in the England Biodiversity List published under section 41 of the Natural Environment and Rural

Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. A list of priority habitats and species can be found on Gov.uk.

Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found here.

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

Natural England's generic advice on other natural environment issues is set out at Annex A.

Sites of Special Scientific Interest Impact Risk Zones

The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on "Development in or likely to affect a Site of Special Scientific Interest" (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Annex A – Additional advice

Natural England offers the following additional advice:

Landscape

Paragraph 174 of the National Planning Policy Framework (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stonewalls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the Landscape Institute Guidelines for Landscape and Visual Impact Assessment for further guidance.

Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 174 and 175). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in GOV.UK guidance Agricultural Land Classification information is available on the Magic website on the Data.Gov.uk website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

Guidance on soil protection is available in the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, and we recommend its use in the design and construction of development, including any planning conditions. For mineral working and landfilling separate guidance on soil protection for site restoration and aftercare is available on Gov.uk website. Detailed guidance on soil handling for mineral sites is contained in the Institute of Quarrying Good Practice Guide for Handling Soils in Mineral Workings.

Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Protected Species

Natural England has produced standing advice¹ to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Local sites and priority habitats and species

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 175 and 179 of the NPPF and any

relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

Priority habitats and Species are of particular importance for nature conservation and are included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. List of priority habitats and species can be found on Gov.uk.

Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found here.

Ancient woodland, ancient and veteran trees

You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 180 of the NPPF. Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. Natural England and the Forestry Commission have produced standing advice for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications.

Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Environmental gains

Development should provide net gains for biodiversity in line with the NPPF paragraphs 174(d), 179 and 180. Development also provides opportunities to secure wider environmental gains, as outlined in the NPPF (paragraphs 8, 73, 104, 120, 174, 175 and 180). We advise you to follow the mitigation hierarchy as set out in paragraph 180 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you should consider off site measures.

Opportunities for enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding a green roof to new buildings.

Natural England's Biodiversity Metric 4.0 may be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. For small development sites the Small Sites Metric may be used. This is a simplified version of Biodiversity Metric 4.0 and is designed for use where certain criteria are met.

Natural England's Environmental Benefits from Nature tool may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside Biodiversity Metric 4.0 and is available as a beta test version.

Green Infrastructure

Natural England's Green Infrastructure Framework provides evidence-based advice and tools on how to design, deliver and manage green infrastructure (GI). GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.

Development should be designed to meet the 15 Green Infrastructure Principles. The Green Infrastructure Standards can be used to inform the quality, quantity and type of green infrastructure to be provided. Major development should have a GI plan including a long-term delivery and management plan. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

GI mapping resources are available [here](#) and [here](#). These can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision.

Access and Recreation

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to urban fringe areas should also be explored to strengthen access networks, reduce fragmentation, and promote wider green infrastructure.

Rights of Way, Access land, Coastal access and National Trails

Paragraphs 100 and 174 of the NPPF highlight the important of public rights of way and access.

Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on the any nearby National Trails. The National Trails website www.nationaltrail.co.uk provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts.

Biodiversity duty

Your authority has a duty to have regard to conserving biodiversity as part of your decision making.

Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available [here](#)

1.1.24 Three Rivers District Council - Development Plans: [Comment]:

Representation: This application seeks permission for the creation of a Film Hub through demolition and alterations of some existing buildings and the construction of new buildings. The application also seeks permission to relocate the existing Children's Farm. The proposal also comprises of improvements to Locally Listed and Grade II and II* Listed Buildings within the site, which are sought for in a separate application for Listed Building Consent.

The site is located in the Green Belt. Policy CP11 of the Core Strategy (adopted 2011) states that 'there will be a general presumption against inappropriate development that would not preserve the openness of the Green Belt, or which would conflict with the purpose of including land within it.' Policy DM2 of the Development Management Policies LDD (adopted 2013) states that the construction of new buildings in the Green Belt is inappropriate, with certain exceptions listed in the National Planning Policy Framework (NPPF, 2021). The NPPF states, that inappropriate development is, by definition, harmful to the Green Belt and should not be approved unless the potential harm to the Green Belt by reasons of inappropriateness, and any other harm, is clearly outweighed by other considerations. The application supporting documents state the following benefits anticipate the very special circumstances in the NPPF; contribution to the economy and employment opportunities, heritage value, sustainable development, ecology and biodiversity net gain and inclusion of public space, open space and shared facilities with local services. On this basis, the development of a film hub on this site can be considered as very special circumstances.

Policy CP1 'Overarching Policy on Sustainable Development' of the Core Strategy states that new development, in contributing to the sustainability of the District, needs to take account of protecting and enhancing existing community facilities and providing new facilities. Policy CP1(m) of the Core Strategy states development should take into account necessary infrastructure to enable and/ or support development, including (but not limited to) education, green infrastructure, leisure and community facilities. The application proposal includes improvements, alterations and enhancement to existing community facilities including the relocation of the Children's Farm, within the vicinity of the site, to adjacent to St Pauls Primary School and Nursery. The application supporting documents state a new parking facilities, a café and learning space will be provided alongside the Children's Farm, as a means to support its use. The supporting documents also state three new pedestrian and cycle access are proposed alongside a new public footpath and cycle path within the parkland area, where improvements to the landscape and woodland are proposed.

The Spatial Strategy in the Core Strategy states in order to achieve the Spatial Vision for Three Rivers, new development will be directed towards previously developed land. Policy CP1(m) states development should make efficient use of land by guiding development onto previously developed, brownfield land and incorporate mixed-use development wherever possible, recognising that some previously developed land can have significant biodiversity value. The National Planning Policy Framework's (NPPF) core planning principle is to encourage the effective use of previously developed land and also supports development of brownfield land. The application proposes development on green-field land with a portion of the application site on previously developed land and on a brownfield site. The development proposal also includes retaining a significant portion of green-field land with improvements to landscape alongside biodiversity net gain and the planting of approximately 680 new trees to enhance the green space. Therefore, the proposal complies with the Spatial Strategy and Policy CP1(m).

Policy DM3(a) 'The Historic Built Environment' supports the retention and enhancement of heritage assets and to putting heritage assets to viable and appropriate uses to secure their future protection. The policy states development should sustain, conserve and where appropriate enhance the significance, character and setting of the asset itself and the surrounding historic environment. The development site contains one Locally Important Building, three Grade II and one Grade II* Listed Buildings within the vicinity of the site. The application supporting documents states improvements and enhancements to all Listed and Locally-Listed Buildings on site will be sought in a separate application for Listed Building Consent. *On this basis*, the proposal would comply with Policy DM3(a) however this will be considered in more detail as part of the Listed Building Consent application.

The South West Herts Economic Study (2019) states the TV and film studios in 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. Therefore, the application proposal would be contributing towards the growth of the TV and film industry within the District. The Economic Study also estimates that there is a requirement for 28,800 sqm of industrial and warehousing floorspace over the period to 2036. After taking into account existing commitments and capacity on existing employment allocations, the total requirement for industrial and warehousing space is 21,945 sqm (or 5.5ha of employment land using the plot ratio of 0.4 recommended in the Economic Study). Policy CP6 of the Core Strategy states that the Council will provide for a range of small, medium and large business premises and retain overall levels of industrial and warehousing floor space within the district. The application proposes flexible units within the Craft Workshop zone which supports the use of industrial and warehousing space including B2 and B8 uses. The supporting documents state the South Site area will include Support Workshops whereby each workshop will have the facilities to support activity falling within B2 and B8 uses. Subsequently, the application complies with the South West Herts Economic Study and Policy CP6 of the Core Strategy.

In respect of proposed offices, Policy CP6(n) states that the sustainable growth of the Three Rivers economy will be supported by releasing office space from employment use where this is expected to be surplus to employment needs across the plan period, as indicated by an up to date Employment Land Study. The South West Herts Economic Study (2019) estimates an oversupply of 6,263sqm during the period to 2036 and so the proposal would not be in conflict with Policy CP6(n).

1.1.25 Three Rivers District Council – Transportation and Parking: No comments received.

1.1.26 Three Rivers District Council – Environmental Health (Residential): [No objection].

Construction Noise

Due to their being no construction management plan available, Wardell Armstrong have not been able to undertake a detailed assessment of the potential significant effects from construction on the nearest sensitive receptors. Therefore, indicative prediction of construction noise has been utilised.

Having considered the given background noise, the impact of predicted noise generated from the site during clearance and hardstanding laydown would be low to all NSRs (nearest sensitive receptors). The impact of predicted noise generated from the construction of the buildings, shows that without mitigation, there is potential for significant impact to NSRs 2, 4 and 5. As a result, noise mitigation is required. No appropriate site specific and best practice noise and vibration mitigation measures have been identified. Therefore, prior to commencement of any construction activities, a Construction Management Plan should be submitted to and agreed by

the Local Planning Authority. The CMP should include the suggestions outlined within paragraph H5.3 of the Noise and Vibration Document.

Construction Light

The lighting management plan for the construction phase is satisfactory and providing the mitigation measures outlined are implemented, we do not believe there will be a significant impact to residents.

Operational Phases

Noise

Predicted Operational noise levels generated from the construction of sets on the backlot operation, the Sound Stages, Craft Zone and Support Workshops has identified a negligible to low impact on all NSRs. Section H5.23 has mentioned the use of special effects, but the noise generated from the use of the special effects has not been assessed. Therefore, to safeguard residents from the potential impacts of noise generated from the use of special effects, a noise assessment should be undertaken and submitted to and agreed by the Local Authority.

We also suggest that as the noise from the use special effects are likely to have an adverse impact on residents, special effects proposals and mitigation needs to be submitted to the local authority within 10 days for approval (similar to Warner Brothers). Surrounding neighbours must be provided with advanced warning of the intended use of special effects. Where night shoots are proposed to take place on the back lot, communication with all surrounding residents should be undertaken in advance, as soon as the schedule of filming is known.

Overall, providing the appropriate mitigation is put into place during the construction and operational phases, we have no objections to the applications.

- 1.1.27 Three Rivers District Council – Environmental Health (Commercial): [No objection] The Environmental Health Officer confirmed that they had no additional comments to make on the revised scheme.

Air Quality

I have reviewed Chapter I - Air Quality of the ES.

An Air Quality Assessment has been undertaken to assess the impacts of the construction and operational phases of the proposed development.

The assessment of construction phase impacts concludes that the implementation of embedded mitigation measures during the construction phase, will substantially reduce the potential for dust and particulate matter to be generated and any residual impact on sensitive receptors is considered to be not significant.

The assessment of operational phase impacts concludes that there will be no exceedances of the relevant air quality objectives or target levels and negligible impacts. The residual effect of the proposed development on sensitive receptors is considered to be not significant.

I would recommend that a condition requiring the submission of a dust management plan be applied to any permission granted. The dust management plan should incorporate the recommended mitigation measures discussed in paragraphs I5.3-I5.5 of the Air Quality Assessment.

Measures aimed at reducing private car use during the operational phase are welcomed. I understand from reading the Air Quality Assessment that the applicant has prepared a Travel Plan. The plan is also discussed in the Transport Assessment. Unfortunately, I could find the Travel Plan amongst the documents available online.

Land Contamination

I have reviewed Chapter M - Ground Conditions of the ES and the Phase 1 Desk Study prepared by Wardell Armstrong (Report ref. GM12410/Final).

The preliminary risk assessment has identified a number of plausible contaminant linkages that require further investigation. The Environmental Consultant has recommended that a targeted ground investigation be undertaken.

Based on this, the standard contaminated land condition is recommended on this and any subsequent applications for the site.

1. Prior to the commencement of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:

i) A site investigation scheme, based on the Phase 1 Desk Study prepared by Wardell Armstrong (Report ref. GM12410/Final), to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site. This should include an assessment of the potential risks to: human health, property (existing or proposed) including buildings, crops, pests, woodland and service lines and pipes, adjoining land, ground waters and surface waters, ecological systems, archaeological sites and ancient monuments.

ii) The site investigation results and the detailed risk assessment (i) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

iii) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in (ii) are complete and identifying any requirements for longer term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these components require the express consent of the local planning authority. The scheme shall be implemented as approved.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

2. Following completion of measures identified in the approved remediation scheme and prior to the first use or occupation of the development, a verification report that demonstrates the effectiveness of the remediation carried out must be produced together with any necessary monitoring and maintenance programme and copies of any waste transfer notes relating to exported and imported soils shall be submitted to the Local Planning Authority for approval. The approved monitoring and maintenance programme shall be implemented.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried

out safely without unacceptable risks to workers, neighbours and other offsite receptors.

The above must be undertaken in accordance with the Environment Agency's 'Land contamination risk management (LCRM)' guidance, available online at <https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm>.

3. Reporting of Unexpected Contamination: In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken, and where remediation is necessary a remediation scheme must be prepared, which is subject to the approval in writing of the Local Planning Authority. Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

1.1.28 Affinity Water: [No objection]

Thank you for notification of the above planning application. These are referred to us where our input on issues relating to water quality or quantity may be required.

You should be aware that the proposed development site is located within an Environment Agency defined groundwater Source Protection Zone 1 (SPZ1) corresponding to our Pumping Station (HUNT). This is a public water supply, comprising a number of Chalk abstraction boreholes, operated by Affinity Water Ltd (AW).

We currently object to the application and require the submission of further information for our review, to allow us to assess the application in greater detail and, if we are able to remove our objection, provide informed condition requirements. This further information should include the following:

- i) Intrusive Ground Investigations to identify the current state of the site and appropriate techniques for any on site works to avoid displacing any contamination to a greater depths, including the generation of turbidity.
- ii) A Risk Assessment identifying both the aquifer and the abstraction point(s) as potential receptor(s) of contamination (including turbidity).
- iii) Proposals for the likely depth and type of excavations (e.g. piling) including mitigation measures (e.g. appropriate piling design, etc.) to prevent and/or minimise any potential migration of pollutants to public water supply.
- iv) Proposals for a Surface Water Drainage Strategy demonstrating appropriate use of sustainable urban drainage systems that prevent the mobilisation of any contaminants ensuring protection of surface and groundwater.

We need to ensure we have been provided with as much information as possible for our review, as issues arising from the development can cause critical abstractions to switch off resulting in the immediate need for water to be sourced from another location, which incurs significant costs and risks of loss of supply during periods of high demand.

At this time it is our view that the development as proposed represents a risk to groundwater, however if our requests, set out above, have been addressed we may ask that appropriate conditions are imposed to protect the public water supply.

Water efficiency

Being within a water stressed area, we expect that the development includes water efficient fixtures and fittings. Measures such as rainwater harvesting and grey water recycling help the environment by reducing pressure for abstractions in chalk stream catchments. They also minimise potable water use by reducing the amount of potable water used for washing, cleaning and watering gardens. This in turn reduces the carbon emissions associated with treating this water to a standard suitable for drinking, and will help in our efforts to get emissions down in the borough.

Infrastructure connections and diversions

There are potentially water mains running through or near to part of proposed development site. If the development goes ahead as proposed, the developer will need to get in contact with our Developer Services Team to discuss asset protection or diversionary measures. This can be done through the My Developments Portal (<http://affinitywater.custhelp.com/>) or aw_developerservices@custhelp.com.

In this location Affinity Water will supply drinking water to the development. To apply for a new or upgraded connection, please contact our Developer Services Team by going through their My Developments Portal (<https://affinitywater.custhelp.com/>) or aw_developerservices@custhelp.com. The Team also handle C3 and C4 requests to cost potential water mains diversions. If a water mains plan is required, this can also be obtained by emailing maps@affinitywater.co.uk. Please note that charges

Comments received xxx – No objection

We have reviewed the response submitted to our objection letter dated 25/08/23 and are now prepared to remove our objection providing that the following conditions are applied to the planning permission.

1. Contamination through Ground Works

Any works involving excavations that penetrate into the chalk aquifer below the groundwater table (for example, piling or the installation of a geothermal open/closed loop system) should be avoided. If these are necessary, then the following condition needs to be implemented:

Condition

A) Prior to the commencement of the development, no works involving excavations (e.g. piling or the implementation of a geothermal open/closed loop system) shall be carried until the following has been submitted to and approved in writing by the Local Planning Authority in consultation with Affinity Water:

i) An Intrusive Ground Investigation to identify the current state of the site and appropriate techniques to avoid displacing any shallow contamination to a greater depth.

ii) A Risk Assessment identifying both the aquifer and the abstraction point(s) as potential receptor(s) of contamination including turbidity.

iii) A Method Statement detailing the depth and type of excavations (e.g. piling) to be undertaken including mitigation measures (e.g. turbidity monitoring, appropriate piling design, off site monitoring boreholes etc.) to prevent and/or minimise any potential migration of pollutants including turbidity or existing contaminants such as

hydrocarbons to public water supply. Any excavations must be undertaken in accordance with the terms of the approved method statement.

The applicant or developer shall notify Affinity Water of excavation works 15 days before commencement in order to implement enhanced monitoring at the public water supply abstraction and to plan for potential interruption of service with regards to water supply.

Reason: Excavation works such as piling have the potential to cause water quality failures due to elevated concentrations of contaminants through displacement to a greater depths and turbidity generation. Increased concentrations of contaminants, particularly turbidity, impacts the ability to treat water for public water supply.

2. Contamination during construction

Construction works may exacerbate any known or previously unidentified contamination. If any pollution is found at the site, then works should cease immediately and appropriate monitoring and remediation will need to be undertaken to avoid any impact on water quality in the chalk aquifer.

Condition

B) If, during development, contamination not previously identified is found to be present at the site, then no further development shall be carried out until the following has been submitted to and approved in writing by the Local Planning Authority in consultation with Affinity Water:

iv) A Remediation Strategy/Report detailing how contamination was/will be dealt with. The remediation strategy shall be implemented as approved with a robust pre and post monitoring plan to determine its effectiveness.

Reason: To ensure that the development does not contribute to unacceptable concentrations of pollution posing a risk to public water supply from previously unidentified contamination sources at the development site and to prevent deterioration of groundwater and/or surface water.

3. Contamination through Surface Water Drainage

Surface water drainage should use appropriate Sustainable Urban Drainage Systems that prevent the mobilisation of any contaminants where a direct pathway to the aquifer is present. This should use appropriate techniques that prevent direct pathways into the aquifer and that ensure sufficient capacity is provided for all surface water to be dealt with on site, preventing consequential flooding elsewhere.

Condition

C) Prior to the commencement of development, no works shall be carried out until the following has been submitted to and approved in writing by the Local Planning Authority in consultation with Affinity Water:

v) A Surface Water Drainage Scheme demonstrating appropriate use of sustainable urban drainage systems that prevent the mobilisation of any contaminants ensuring protection of surface and groundwater.

Reason: Surface water drainage can mobilise contaminants into the aquifer through infiltration in areas impacted by ground contamination. Surface water also has the potential to become contaminated and can enter the aquifer through open pathways, either created for drainage or moved towards existing open pathways where existing drainage has reached capacity. All have the potential to impact public water supply.

Issues arising from any of the above can cause critical abstractions to switch off resulting in the immediate need for water to be sourced from another location, which incurs significant costs and risks of loss of supply during periods of high demand.

The construction works and operation of the proposed development site should be done in accordance with the relevant British Standards and Best Management Practices, thereby significantly reducing the groundwater pollution risk.

For further information we refer you to CIRIA Publication C532 "Control of water pollution from construction - guidance for consultants and contractors".

Water efficiency

Being within a water stressed area, we expect that the development includes water efficient fixtures and fittings. Measures such as rainwater harvesting and grey water recycling help the environment by reducing pressure for abstractions in chalk stream catchments. They also minimise potable water use by reducing the amount of potable water used for washing, cleaning and watering gardens. This in turn reduces the carbon emissions associated with treating this water to a standard suitable for drinking, and will help in our efforts to get emissions down in the borough.

Infrastructure connections and diversions

There are potentially water mains running through or near to part of proposed development site. If the development goes ahead as proposed, the developer will need to get in contact with our Developer Services Team to discuss asset protection or diversionary measures. This can be done through the My Developments Portal (<https://affinitywater.custhelp.com/>) or aw_developerservices@custhelp.com.

In this location Affinity Water will supply drinking water to the development. To apply for a new or upgraded connection, please contact our Developer Services Team by going through their My Developments Portal (<https://affinitywater.custhelp.com/>) or aw_developerservices@custhelp.com. The Team also handle C3 and C4 requests to cost potential water mains diversions. If a water mains plan is required, this can also be obtained by emailing maps@affinitywater.co.uk. Please note that charges may apply.

1.1.29 Thames Water: [No objection]

Waste Comments

This site is affected by wayleaves and easements within the boundary of or close to the application site. Thames Water will seek assurances that these will not be affected by the proposed development. The applicant should undertake appropriate searches to confirm this. To discuss the proposed development in more detail, the applicant should contact Developer Services - <https://www.thameswater.co.uk/developers>

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

The application indicates that SURFACE WATER will NOT be discharged to the public network and as such Thames Water has no objection, however approval should be sought from the Lead Local Flood Authority. Should the applicant subsequently seek a connection to discharge surface water into the public network in the future then we would consider this to be a material change to the proposal, which would require an amendment to the application at which point we would need to review our position.

Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network and as such we have no objection, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks.

Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network and as such we have no objection, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network.

Water Comments

With regard to water supply, this comes within the area covered by the Affinity Water Company. For your information the address to write to is - Affinity Water Company The Hub, Tamblin Way, Hatfield, Herts, AL10 9EZ - Tel - 0845 782 3333.

The applicant is advised that their development boundary falls within a Source Protection Zone for groundwater abstraction. These zones may be at particular risk from polluting activities on or below the land surface. To prevent pollution, the Environment Agency and Thames Water (or other local water undertaker) will use a tiered, risk-based approach to regulate activities that may impact groundwater resources. The applicant is encouraged to read the Environment Agency's approach to groundwater protection (available at <https://www.gov.uk/government/publications/groundwater-protection-position-statements>) and may wish to discuss the implication for their development with a suitably qualified environmental consultant.

1.1.30 British Pipeline Agency: [No objection]

Thank you for your correspondence regarding the above noted planning application.

Having reviewed the information provided, the BPA pipeline(s) is not affected by these proposals, and therefore BPA does not wish to make any comments on this application.

However, if any details of the works or location should change, please advise us of the amendments and we will again review this application.

Whilst we try to ensure the information we provided is accurate, the information is provided Without Prejudice and we accept no liability for claims arising from any inaccuracy, omissions or errors contained herein.

1.1.31 National Grid: No comments received.

1.1.32 Sarratt Parish Council: No comments received.

1.1.33 National Planning Casework Unit: No comments received.

Responses were also received from the following local organisations/groups:

1.1.34 Chandlers Cross Residents Association : [Object]

Chandlers Cross Residents Association represents residents living in Chandlers Cross, Bucks Hill, Commonwood and Sarratt.

CCRA has no issue with the brownfield part of the site being developed; but we object strongly to the proposed loss of Green Belt which would result if the studios are built. While many residents might welcome the promise of local jobs, the application would mean inappropriate and unnecessary development within our precious natural environment.

The height and visual impact of the proposed development on Green Belt along Langleybury Lane would be considerable. Their location and height- 17 metres tall- would utterly transform what is now a green field with mature trees into industrial space. No exceptional circumstances are presented which would justify the loss of Green Belt for this purpose. It appears to be a commercially expedient application which disregards the NPPF and the protections it provides.

Warner Bros have already been permitted development of sound studios on the other side of the valley. If even more capacity is needed, the applicants could use the brownfield part of the site; or other already developed land elsewhere.

A commercial development- and subsequent operation- of this size would impact local traffic

significantly. This would particularly be the case at the start and end of the school day at St Paul's C of E primary school in Langleybury.

Signposting the A41 is all that the applicant can offer; but many vehicles have satnav which will lead drivers through the 'fastest' or 'shortest' route to their destination- down narrow country lanes such as Fir Tree Hill or Old House Lane, which is single track for much of its length.

Langleybury traffic lights junction is already busy and queuing at peak hours, as is traffic joining the M25 at J20 or heading south on the A41 to Hunton Bridge Roundabout. There is frequent congestion and no capacity for yet more vehicles.

We urge Three Rivers to reject the application.

1.1.35 The Countryside Charity Hertfordshire: [Object]

I write with regard to the above application to which CPRE Hertfordshire objects strongly for the following reasons.

The land identified for this proposed development is designated as London Metropolitan Green Belt in the Three Rivers Core Strategy where development is seen as inappropriate unless very special circumstances are identified which clearly outweigh the harms caused, according to criteria in the National Planning Policy

Framework (NPPF). CPRE Hertfordshire is very aware of the negotiations which have taken place with regard to this proposal and that the Applicant quotes the Local Planning Authority (Planning) Policy Officers: “the development of a film hub on this site can be considered as very special circumstances”(paragraph 4.8 Planning Update Statement, July 2023).

We disagree profoundly with this statement by the Council’s Policy officers and note that this opinion was provided in October 2022. Subsequently, detailed work has been taking place on the emerging Three Rivers Local Plan which will soon be subject to Regulation 18 public consultation.

Similar recent local plan consultations in neighbouring authorities, Hertsmere and Dacorum, have received record-breaking responses with regard to the proposed allocation of sites for development on the Green Belt. It is reasonable to suggest that, in the present context, similar levels of response will occur which should lead to a reassessment of the role and function of designated protected land such as Green Belt and the value and benefits of open countryside.

The Government’s commitment to maintaining the Green Belt has also been expressed frequently recently in Ministerial statements, responses to Parliamentary questions, and in the Levelling Up and Regeneration Bill presently under consideration. The “Levelling Up and Regeneration Bill Policy Paper: Further information” re-emphasises the Government’s support for protection of the Green Belt as follows: “the increased weight given to plans and national policy by the Bill will give more assurances that areas of environmental importance – such as National Parks, Areas of Outstanding Natural Beauty...- will be respected in decision on planning applications and appeals. The same is true of Green Belt, which will continue to be safeguarded.” (Creating beautiful places and improving environmental outcomes; In the Bill: LURB Policy paper, May 2022)”

Further, “Existing Green Belt protections will remain, and we will pursue options to make the Green Belt even greener.” (Creating beautiful places and improving environmental outcomes; Alongside the Bill: LURB Policy paper, May 2022).

In addition, the Levelling-Up and Regeneration Bill seeks to rebalance economic activity to locations where it is needed most, and away from areas which are already under significant pressure from development. This is clearly the case in southern Hertfordshire and modern commercial and industrial activities, including film-making and related uses, need not be limited to specific locations.

7. The nature of employment is changing rapidly and this can permit much more flexibility with regard to the location of modern high tech industries and commerce. The benefits asserted by the developer relate to economic issues, “natural capital and sustainability“ and “public benefits“, all of which can exist elsewhere with significantly less harm to protected countryside.

The pressures on open land in southern Hertfordshire are relentless, both from residential and commercial development and very considerable concerns are expressed CPRE is working nationally and locally for a beautiful and living countryside CPRE Hertfordshire is a Charitable Incorporated Organisation regularly by local communities at further development in the Borough’s highly valued protected countryside. We support the expression of these concerns with regard to the loss of protected countryside and note that the constant onslaught on designated land such as Green Belt is bringing the planning system into disrepute. We urge the Council to refuse permission for this application.

1.1.36 The Chiltern Society: [Object]

The Chiltern Society is well-established with circa 7000 members acting as a voice of all those championing the Chilterns and our countryside; campaigning to cut overbearing development, conserving the Chiltern landscape, and promoting the enjoyment and environmental understanding of the area.

The applicant's submission is a 'Full' Planning Application, however, the covering letter states that "since part of the application is submitted in outline, with all matters reserved except for access. Until specific occupiers are identified the precise specification of the development proposals cannot be known within the outline zone" This statement rather undermines the 'full' planning status of the whole application. Table 1 of the covering letter lists the buildings that fall into this 'outline' category, (which seems to cover the majority of the new buildings) where it is stated that this is "based on baseline site information and an understanding of potential future occupier requirements". If the applicant is unclear on future occupier requirements, why is a 'full' planning application submitted and how can an economic assessment of any validity be carried out.

This large Green Belt site is already part developed (in the North of the site) but the majority of the site is an undeveloped open landscape with unrestricted views across the Gade valley. Whilst sympathetic redevelopment of the brownfield parts of the site may have the benefits of industrial development leading to employment and economic growth, the Chiltern Society believe the proposed plans, particularly for the more rural parts of the site (in the Southwest) are far too industrial and overbearing, destroying large areas of open land and obliteration of the open view across the Gade valley in all directions. Proposed buildings of up to 9m, 17m and 18m (just under 60ft) are totally inappropriate for this site.

NPPF Para 140 refers to exceptional circumstances in relation to changes in Green Belt. This is not relevant in this case as it relates to changes in Green Belt itself, which can only be changed as part of a Local Plan. In this respect, the land concerned is currently and will remain Green Belt unless reviewed in a new Three Rivers Local Plan.

Accordingly, the only basis on which this application could be approved is under NPPF 146/7 which requires 'very special circumstances' to be established. None of the 'exceptions' listed in NPPF 149 apply to this case, therefore the development is classed as inappropriate.

The Chiltern Society reject the claim that "the increase in the built form.... "has been sensitively designed as to mitigate harm.... [in].. the wider landscape of the site" and we would not agree that the proposed mitigation would reduce harm even after 15 years of tree growth.

Abbots Langley Parish Council have published documentation supporting their draft Neighbourhood Plan on the importance of the Gade valley views which would be obliterated by this development.

As this development is intended to serve film operations across the South East it would add more traffic to Langleybury Lane, the A41 and surrounding motorway junctions. If the Warner Brothers expansion (22/0491/FUL) is approved, we will expect that the traffic flow analyses for this application will have to be reworked to incorporate the traffic flows in a new baseline.

It is our view that the 'very special circumstance' claimed has not been proven or expressed in relation to scale of the proposed development, in particular to the buildings in the more rural part of the site.

Para 5.32 of the Full Planning Statement claims that parts of the site will remain Green Belt and therefore will be protected for evermore. This clearly is a false assertion as all the land is currently Green Belt and under threat by this proposed development. Should this assertion be true no development would be able to take place across the whole site.

With the Developer's admission on the uncertainty surrounding the requirements of the potential occupiers and hence the economic viability of the site, the argument that the economics of the proposal tilt the balance harm/benefit to achieving the 'very special circumstances' claimed is clearly invalidated. With the proliferation of film making facilities in the local area (the expansion of Warner Bros at Leavesden, new facilities in Bovingdon and proposals for Marlow) one must question the risk of overcapacity.

With the site split between brownfield and rural, and the more speculative building in the rural section, the Chiltern Society would expect separate or phased assessments to be made with appropriate 'full' and 'outline' separate applications.

There are many misleading claims made by the developer. To claim the Langleybury mansion is "unique" is not true as the UK has many such buildings used for film sets. "Enhancements to the parkland" cannot be true with many oversized buildings overlooking the parkland. Only relatively small areas of the site will be opened-up to the public against the claim of "large areas of the site" to be open.

The Developer's site assessment shows that groundwater is vulnerable to pollution and this aspect requires independent scrutiny before any development is approved. Similarly, recognising the site is within a water stressed area more data is required on predicted water usage with comparisons to current usage.

Supporting information on biodiversity and net gain claims, including methodology used, could not be found in the application so comment is not possible at this stage.

Summary

In summary, the Chiltern Society consider this site as being two distinct areas which should be considered separately; one, the brownfield area to the North which may be suitable for sympathetic development; the other, an open landscape with views across the Gade valley that should be protected. With the Developer's very speculative and unsupported claim on the economic benefits, the assertion that the proposal meets the 'very special circumstances' test clearly fails.

The Society's position is therefore to strongly object to this proposed development.

1.1.37 Hertfordshire Film Office: [Support]

I'm writing to support the planning application for a film and television industry hub in Hertfordshire, crucial for the industry's infrastructure and overall operations. This initiative is an exciting development, bolstering the UK's global standing, fostering local job growth, skills development, and attracting future investments.

Hertfordshire has become a key player in the film and TV sector. With its strategic location near Heathrow Airport and London, Hertfordshire is well-situated within the hub of UK Film and TV Production, covering a broad area from central London to the M25 region, where Langleybury Estate is centrally located.

An independent report, commissioned by Hertfordshire LEP, has outlined the essential steps required for the sustainable growth of the industry and the maximization of its economic, social, and environmental contributions on local and national levels. A significant focus will be on addressing the demand for studio space

and, more notably, supplementary facilities in close proximity to accommodate Hertfordshire's remarkable growth in the film production sector.

The Langleybury Film Hub has a unique opportunity to establish a permanent presence in close proximity to effectively serve the rapidly growing film production industry, which is witnessing the emergence of numerous supply chain companies. A commercial office space will complement the existing facilities, offering additional on-site resources tailored to meet the film industry's needs.

As highlighted in Hertfordshire LEP's Sector Action Plan, one of the key strategic actions is to ensure a consistent supply of talent aligned with the scale of studios, both planned and proposed, and the productions they will host. To fulfill this, the inclusion of a Film and Television Training Facility is integral to our proposal.

Situating this training facility at the heart of the Langleybury Film Hub means that aspiring trainees will have immediate access to invaluable hands-on experience, positioning Langleybury as an ideal source of newly trained "graduates" for film studios in the surrounding areas.

This comprehensive proposal, encompassing studio and ancillary space, a training facility, and on-location filming within a sustainable, design-led environment, is poised to meet the diverse needs of the film industry.

This initiative will create long-term employment opportunities across various sectors, from carpentry to catering, benefiting not only the local community but also contributing to the broader UK economy. The collective commitment to stimulate investment, foster local job growth, and drive skills development, positioning Hertfordshire at the forefront of the film and TV industry's future expansion. We wholeheartedly endorse this planning application, recognizing its potential to make a substantial positive impact.

1.1.38 University of Hertfordshire: [Support]

As Dean of the School of Creative Arts at the University of Hertfordshire, submission of this letter confirms in principle support for the current application to develop the Langleybury Film Hub.

Hertfordshire is at the epicentre of a massive increase in production facilities that service the booming UK film industry. Analysis of the sector (BFI Skills Review 2022, Screen Skills 2022) has identified skills shortages and a lack of investment in training as major risk factors undermining the expansion of UK film.

The Hertfordshire Film Office, The University of Hertfordshire, and the county's FE partners are well placed to coordinate and co-deliver socio-economic impact for the region, specifically in the form of a more diverse and socially mobile workforce. Talent and content incubators, the Herts Propeller Stages, will provide a broad array of transformative career opportunities to meet sector skills needs within and beyond the region. An innovative, turbo-charged conservatoire approach, replicating and informed by best practice across the screen sector, will deliver a high volume of work ready talent.

"Hertfordshire's response to the skills shortage and one stop shop offering makes them a force to be reckoned with in the sector." British Film Commission Truly innovative in its approach, the Propeller Stages initiative was recently described by (co-chair of the Creative Industries Council) Sir Peter Bazalgette as a "best in class" exemplary model.

The proposal to develop the Propeller Stages at Langleybury will ensure optimal benefits for the people of Hertfordshire, countering the current situation whereby most

film-related employment opportunities are taken by professionals from outside the county. It is difficult to envisage how our ambitious workforce/ talent pipeline plans for the film sector might otherwise be delivered, as the Langleybury opportunity enables opportunities at the scale required of the sector. The proposal has received notable senior-level backing already from Warner Bros., Sky Elstree, the BBC, BFI, Sunset Studios and Screen Skills.

The University of Hertfordshire is working in conjunction with key delivery partners, fully endorsed and supported by senior leadership teams at the four Further Education providers in the County as well as Elstree Screen Arts Academy. Key objectives are to increase employment for inhabitants of the County and support future growth for the sector. A transformative social justice agenda, dedicated to working with schools and less privileged local communities (working also with Department for Work and Pensions, Job Centre + etc.) to challenge barriers to entry while creating accessible careers pathways, constitutes a driving principle for the project.

We fully support the opportunity to co-develop and shape such a dynamic opportunity, driven to maximise the wider economic benefits it will no doubt bring.

1.1.39 Creative England – Filming In England: [Support]

Creative England is the national agency endorsed by the Department for Digital, Culture, Media and Sport (DCMS) and funded by the British Film Institute (BFI) to maximise and support international and domestic film and TV production to shoot in England, outside London. We work to develop a production-supportive environment and support further spread in the levels of feature film and high-end TV production activity taking place across the English regions, ensuring communities across the nation enjoy the profile, job opportunities and economic benefits that the sector generates.

The film and TV sector is a major contributor to the UK creative industries economy, with an important role to play in the UK's economic recovery from the Covid-19 pandemic and

contributing to the Government's ambitions to grow and develop industries UK-wide. Official 2021 BFI statistics demonstrates the growth and resilience of the sector with record-breaking level of film and TV production spend in the UK reaching £5.64 billion, the highest ever reported and £1.27 billion higher than for the pre-pandemic year 2019. This highlights the confidence international filmmakers have in the UK's creativity, the expertise of our crews, world-class production facilities and diverse filming locations combined with the generous UK creative tax reliefs.

Despite the UK's success in attracting unprecedented levels of production, the supply of studio space infrastructure has not been in-step with demand and the current renewed demand for content has never been on a greater trajectory. The proposals at Langleybury compliments the current major studio developments in train - many of whom have long-term take over deals with streamers and major studios - by providing stage space for smaller, independent productions. The Langleybury Film Hub development proposals directly responds to the shortage of dedicated, blended space in the UK that Creative England have seen over the last number of years.

Langleybury Filming Hub proposals include preservation of Langleybury Mansion, a unique filming location that has welcomed filming for Paddington, Grantchester, Downton Abbey, The Crown, Kingsman 2, The Little Stranger, Endeavour and many more, validating its importance as a filming location in the UK. The planned workshop and ancillary support space, dedicated backlot and purpose-built space for supply-

chain companies would meet industry requirements and provide a high-quality working environment for the film and TV industry to operate from.

Hertfordshire located in the super production hub of the south-east of England, has attracted some of the most commercially successful and iconic names in film and TV of all time. From Warner Bros'. Wonder Woman and Fantastic Beasts to Netflix's Bridgerton and The Crown productions that are driving growth and stability in the sector. On a more local level, the studio proposals support establishing long-term employment & training opportunities for local people in Three Rivers District and the surrounding boroughs. This supports the UK in developing a sustainable and diverse workforce that is world leading and can support the huge quantities of content being produced.

The Langleybury Film Hub development offers the opportunity to ensure local communities enjoy the profile, job opportunities and economic benefits that the sector generates. Creative England would like to extend their full support to the proposed Langleybury Film Hub development.

1.1.40 National Film and Television School: [Support]

As Director of the National Film and Television School, I write in support of the proposed Langleybury Film Hub Development.

The proposed development is critical to cementing the local area as the leading destination for Film and Television in the UK whilst helping to maintain our position globally against fierce competition.

It is well documented that multiple sound stages are currently being built across the UK by established studios and at new developments to fulfil demand as the industry grows.

The Langleybury Film Hub Development is highly complementary to those developments as the provision of workshop and ancillary support space is critical to ensuring the needs of those new and growing studio facilities – such as Warner Bros Studios Leavesden, Sunset Studios Waltham Cross, and Sky Studios Elstree - can be effectively serviced. Purpose-built space for supply chain companies, to give them a home at the heart of the action and where they can best service their customer base is rare, and will be a major boon to local SMEs. I therefore support all aspects of the proposed development including the period filming location, workshops, production offices and backlot filming space.

I'm also very supportive of the proposed training facility and see it as a major opportunity for the local area to ensure the benefits of these major Hollywood studios benefit local people. I have met with the team on a number of occasions and have been impressed with their plans.

At the NFTS we run more behind the camera courses than any other film school in the world, with courses covering all aspects of film and television production. We have an extremely close connection with all the major UK studios, and many of our graduates are regularly employed at Leavesden Studios, Pinewood and Shepperton. They work in a variety of role on some of the biggest films in the world. For example, recently, we had a dozen graduates working on House of the Dragon at Leavesden and many are currently working on the Fast and Furious 10, Blitz, Barbie and Wicked.

At the NFTS we welcome all inward investment into the UK film industry, particularly when it will create and support so many jobs and opportunities for our graduates locally.

I hope you will give your full support to this investment, which will ensure that the local area remains at the heart of global film and television production for years to come, providing work for NFTS graduates and other local talent and will ensure that they have world-class facilities in which to practice their trade once they graduate.

1.1.41 Screen Skills: [Support]

We are the industry skills body for the screen industries, working to support continued growth and future innovation across the country by investing in a skilled and inclusive UK wide workforce. We provide insights, career development and wider skills opportunities to help people get into the industry and progress within it.

Our work includes:

Identifying skills gaps – current and future – to provide an evidence base for investment in skills and training

Providing careers information to inform the next generation of talent

Mapping and quality-marking professional pathways to improve entry-level diversity and work readiness

Supporting development at every stage of a professional career in screen including through training, mentoring and by offering bursaries

Working with wider Creative Industries partners to shape, support, influence and aid the practical application of key skills initiatives, economic growth, and areas of government's skills policy and beyond, including levelling up.

This letter is in support of the proposal of the Langleybury Film Hub for the following reasons:

It provides an ideal geographical location for the film and TV industry

As an already existing and iconic filming location, this project furthers the preservation, enhancement, and use of the area

In line with ScreenSkills goal of supporting, training, and investing in the current and future workforce, Langleybury offers a training facility to help support the pipeline of high quality, well qualified, experienced crew to ensure the film and TV industry in the UK continues to grow

Langleybury is not exclusively for larger productions. Smaller stage spaces mean smaller independent productions have the opportunity to access facilities and not feel squeezed out of spaces due to continuous takeover deals by major streamers and studios that is becoming a common occurrence

Langleybury is a high-quality, purpose-built facility that is design-led to allow productions to create amazing content.

Langleybury has taken into account the ever changing and demands of the industry and is aiming to support the infrastructure and operations of the film and TV industry with new development to fulfil the demands as the industry continues to grow.

1.1.42 British Film Commission: [Support]

As you may be aware, the British Film Commission (BFC) is the UK Government's national organisation responsible for supporting inward investment film and TV production in the UK, funded by the Department for Digital, Culture, Media and Sport

(DCMS) through the BFI and by the Department for International Trade (DIT). The BFC leads on:

1. Maximising and supporting the production of major international feature film and high-end TV in the UK;
2. Strengthening and promoting the UK's film and TV infrastructure;
3. Liaising between the Government and the film and TV industry to secure and maintain production friendly policies.

The global demand for audio-visual content for theatrical release, broadcast and streaming has never been greater. As a result, the film and TV industry has become increasingly valuable in terms of employment and investment. UK Government recognises that film and TV presents a unique economic and cultural proposition, highlighting "the impact that creative anchor institutes can have on pride and economic performance in an area". Film and TV studios are cited as an example of how creative businesses and local investment increase employment and share spill over benefits across the area and the supply chain.

The combined total UK spend on film and HETV productions for the 12 months from July 2021 to June 2022 was £5.72 billion. It is a 3% increase in spend on the previous 12-month period and is also now the highest figure seen since records began. Recent industry research concluded that, with access to appropriate skills provided by industry initiatives such as the one proposed within the Langleybury Film Hub development, film and HETV production in the UK is likely to exceed £7 billion annually by 2025.

As outlined in our recent support of the Application for expansion by Warner Bros. Studios Leavesden, facilities in the south east of England, not least those within Hertfordshire, have hosted some of the highest profile and most commercially successful film and TV productions of all time. The region benefits from the UK's largest crew base, leading creative talent, iconic locations and cutting-edge production, post-production, and visual effects facilities, all of which contribute to the area's reputation as one of the best places in the world to produce high-end content.

The British Film Commission is the national division of Film London. The BFC, together with our public and commercial partners, work together to ensure that the UK remains the leading destination for major international and domestic film and TV production. Key to this is supporting the revision of complementary developments in appropriately situated and easily accessible locations, such as those proposed at the Langleybury Film Hub, brought forward by Ralph Trustees Limited (RTL).

1.1.43 British Film Institute: [Support]

The BFI is the UK's lead organisation for film and the moving image. We are a cultural charity and a National Lottery distributor. We work with Government and industry to ensure the continued growth of the UK's screen industries.

The UK is a global hub for film, TV and screen sector production. We have world-class skills, locations and production facilities that are the envy of the world. The UK film and high-end TV (HETV) production sector is a global success story that has witnessed extraordinary economic growth in recent years, generating hundreds of thousands of jobs, building skills and creating opportunities for young people from all backgrounds.

Latest official figures published by the BFI's Research and Statistics Unit in July 2022 highlight the growth in the economic recovery of UK film and HETV production in the wake of the pandemic with record levels of spend contributed to the UK economy.

The combined total UK spend on film and HETV productions for the 12 months from July 2021 to June 2022 was £5.72 billion. This is a 3% increase in spend on the previous 12-month period and is also the highest figure seen since records began. Furthermore, recent industry research indicates, with appropriate resources and support, production spend could exceed £7 billion annually by 2025.

Such compelling evidence demonstrates the significant future demand from both domestic and inward investment film, TV and streaming content creators. The UK needs to expand its infrastructure capacity to capitalise on this projected growth, which would create and support long-term employment opportunities in a broad range of disciplines.

Situated within the UK's largest crew base, close to established studios - Warner Bros.

Studios Leavesden and Bovingdon Studios – the Langleybury Film Hub is proposed for a site already well known to, and well-used by, film-makers so has an established industry track record. In short, the proposal presents a compelling opportunity to compliment the area's existing screen infrastructure, attracting further investment and employment to the benefit of the local community and the wider UK.

1.1.44 Hertfordshire Local Enterprise Partnership: [Support]

I am writing in support of your planning application to Three Rivers District Council to create a hub for the wider film and television industry offering a blend of uses critical to the infrastructure and operations of the industry as a whole.

This is a really exciting step forward in the development of the film and TV industry locally, reinforcing the UK's position as a global player and supporting local job creation, skills development and future inward investment opportunities.

Hertfordshire is already a global leader in the industry and its creative sector has rapidly expanded in the past 12 months, strongly establishing the county as a key location for film and TV production in the UK and a prime destination for on-location filming with screen tourism a key focus for Visit Herts recovery strategy post COVID.

Hertfordshire is perfectly positioned to respond to this unprecedented demand. Driven in large part by access to Heathrow Airport and central London, the hub of UK Film and TV Production is defined around a 'wedge' that extends from central London (Soho) out through west London across an arc that (loosely) follows the M25 – approximately from the M3 in the west to the A1(m) in the east. Hertfordshire is fully part of this broader footprint and Langleybury Estate sits at its physical epicentre, currently within 30 minutes' drive of more than 75 sound stages.

An independent report into the health of the sector commissioned by Hertfordshire LEP, has identified what will be needed to enable the industry to grow sustainably as well as leverage its economic, social, and environmental value both locally and nationally. One of the key interventions will be to address the need for studio and, in particular, ancillary space in close proximity to support Hertfordshire's impressive growth trajectory, especially in film production. A loss of surplus capacity for employment growth has already been compounded by Permitted Development Rights (PDR) and the lack of a co-ordinated approach to transport infrastructure.

With many more supply chain companies being established due to the rate of industry growth, there is an opportunity for Langleybury Film Hub to provide a permanent base within close proximity to best service the film production industry. A commercial office space will provide complementary facilities that serve as an additional on-site resource to be utilised by the film industry.

One of the other key interventions identified in Hertfordshire LEP's Sector Action Plan is to provide a reliable supply of talent consistent with the scale of studios which are either planned or proposed and the productions that will use them. The inclusion of a Film and Television Training Facility is also integral to this proposal. Placing a training facility at the core of Langleybury Film Hub means that prospective trainees are on the doorstep of invaluable vocational experience opportunities, with Langleybury's location meaning it is ideally positioned to supply newly trained 'graduates' to all film studios in the surrounding areas.

With a varied offer comprising both studio and ancillary space, a training facility and on-location filming within a design-led, sustainable environment, this proposal will best serve the needs of this sector and provide longterm employment opportunities for local people across a wide range of areas from carpentry to catering.

Crucially, the benefits is not limited to the local area but will also support the wider UK economy.

Our Annual Conference broadcast live from Warner Bros. Studios Leavesden last year demonstrated that there is a real appetite to work together to stimulate future investment, drive local job creation and spearhead skills development, putting Hertfordshire at the fulcrum of the film and TV industry's future growth.

We strongly support this planning application which will best serve Hertfordshire's world-class film and TV industry and deliver huge positive benefits to residents and businesses in the supply chain.

1.1.45 Abbots Langley Neighbourhood Plan Steering Group: [Support]

Does not compromise the five purposes of Green Belt.

I am writing in support this planning application because of the many public benefits that result from these proposals, as result of major private investment from a local landowner - Ralph Trustees Ltd. I acknowledge that 'any development of Greenbelt Land must meet the requirements as defined in National Planning Policy Framework (NPPF) which states at Para 138: "Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas.
- b) to prevent neighbouring towns merging into one another.
- c) to assist in safeguarding the countryside from encroachment.
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land."

I believe none of the above five purposes will be compromised and legal agreements should be put in place to ensure any future development does not undermine this position. With regard to (c), the proposals do assist in safeguarding the countryside by the significant investment in renewing the natural landscape and removal of derelict and inappropriate buildings, whilst ensuring the new on-site activities provide funding for the continued maintenance of the natural environment of this estate.

The proposals do present 'exceptional' opportunities for the future use of this site NPPF Para 140: 'Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. ... Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to

those boundaries may be made through non-strategic policies, including neighbourhood plans.'

I believe the proposals in this Planning Application do represent 'exceptional circumstances' which provide proposals which are uniquely relevant to the Langleybury Estate. Eight particular benefits for the community include:

1. Restoring the Grade Two listed building, Langleybury House (built in 1720) and its formal gardens/orchard etc. This is on the English Heritage Buildings at Risk Register.
2. To replace the derelict Langleybury Secondary School that closed in 1996 - 26 years ago.
3. To provide a much-needed Craft Campus with units for long term hire as well as a Film and Television Training Facility, workshops, sound stages and production offices. These are facilities directly relevant to the future development of the film/TV industries in this area and ensure local people can receive the skilled training, experience and qualifications to allow them to work locally on well-paid employment.
4. The proposed enlarged area of open parkland with access to the Grand Union Canal and tree planting.
5. Providing a joined up public foot paths and cycle network, improved facilities and relocation/renovation of the Children's Farm, additional parking facilities and a café in the restored walled gardens of Langleybury House.
6. The proposals have been developed in consultation with Historic England and could provide many benefits for the area as well as restoring the historic views from Langleybury House including the restored parkland.
7. Interest was shown by the Ralph Trustees in an Aspirational Project (See Draft Abbots Langley Neighbourhood Plan, Chapter 12, Page 100, <https://www.abbotslangley-pc.gov.uk/parish-council/draft-2abbots-langley-neighbourhood-plan/>)for a Community Garden and the range of services that the Sunnyside Trust could provide, if this planning application receives permission to go ahead. Sunnyside were asked to respond to this opportunity by preparing a list of proposals for the Langleybury Estate and summarise their 25 years of experience providing training and work for young people and adults with

learning disabilities. This document was submitted by the Sunnyside Trust to the Ralph Trustees for discussion on 20th November 2022.

The Sunnyside Trust 'would like to be part of and potentially coordinate a group of community partners (Langleybury Church, St Paul's School, the Children's Farm, the Cricket Club, Electric Umbrella, New Hope, Watford Chamber of Commerce, Abbots in Transition) to offer a community hub to run a variety of social enterprises.

Addressing Local Concerns

The main two concerns that appear to be under discussion with regard to this planning application are:

1. Increased traffic on Langleybury Lane.
2. Siting new buildings on the south-west area of the site, adjacent to Langleybury Lane.

Response to 1. Increased traffic on this road should not be significant due to the activities at the Film Hub.

The current main uses relate to school traffic to/from St Paul's School, and movement from Abbots Langley to schools in the Croxley Green area. Proposals for additional parking which parents can use when at St Paul's School will improve safety and remove roadside parking on Langleybury Lane. This is a rural road with few buildings along this section. Any traffic pollution and noise will be insignificant compared to the nearby M25 which is adjacent to this lane, although screened by trees and the motorway cutting.

Response to 2. Having visited the exhibition of the Film Hub Proposals in November 2022, I understand that the proposed new buildings are beyond a ridge and therefore cannot be seen from the public parkland in the Gade valley. These buildings can be seen from the ridge across the valley, adjacent to Gypsy Lane and some other housing areas in Hunton Bridge. If this is a concern for residents, I believe more native trees could be planted and, if necessary, additional earthworks on site, to ensure the rural views can be preserved.

My support for these proposals is because of the importance of this scheme for the local economy, the creation of employment and training for a wide range of people of differing abilities, the removal of derelict buildings and the restoration of our local heritage whilst offering improved recreational facilities for the community and enhancing the biodiversity of the area. This is an exceptional opportunity providing a relevant future for this site and is compatible with the policies presented in the Draft Neighbourhood Plan for Abbots Langley.

1.1.46 Watford and West Herts Chamber of Commerce: [Support]

The plans create exciting opportunities for the local economy, community and, more specifically, local charities and minority groups.

Within Watford, Three Rivers, and Dacorum, we have created the "Inclusion Network", a community of like-minded charities and businesses, including Woodoaks Farm, Sunnyside Rural Trust, Electric Umbrella and Blue Tangerine Federation. These fantastic organisations are championing disability confidence, employability and skills, numeracy, inclusion, diversity, and sustainability. They are also the key to unlocking Community Wealth, the United Nations SDGs and the more recent ESG strategies that businesses cannot do without.

We also have a well-established Digi-Cluster network, which supports local creative/digital agencies that have chosen to move their business into our "Golden Triangle". Keeping and boosting the film and creative industry within West Hertfordshire means more employment and opportunities for our community, more opportunities for local people and more opportunities for local businesses.

This planning application has the full support of the Watford Chamber.

We would welcome a conversation to tell you more and are keen to assist where we can, we feel that collaboration, partnerships, and community is the way forward for our districts.

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Langleybury Film Hub – 22/1945/FUL
Site Photos



Picture taken from public footpath to the east



Picture taken from the east of the site looking towards existing built form



Picture taken from the north of the Mansion



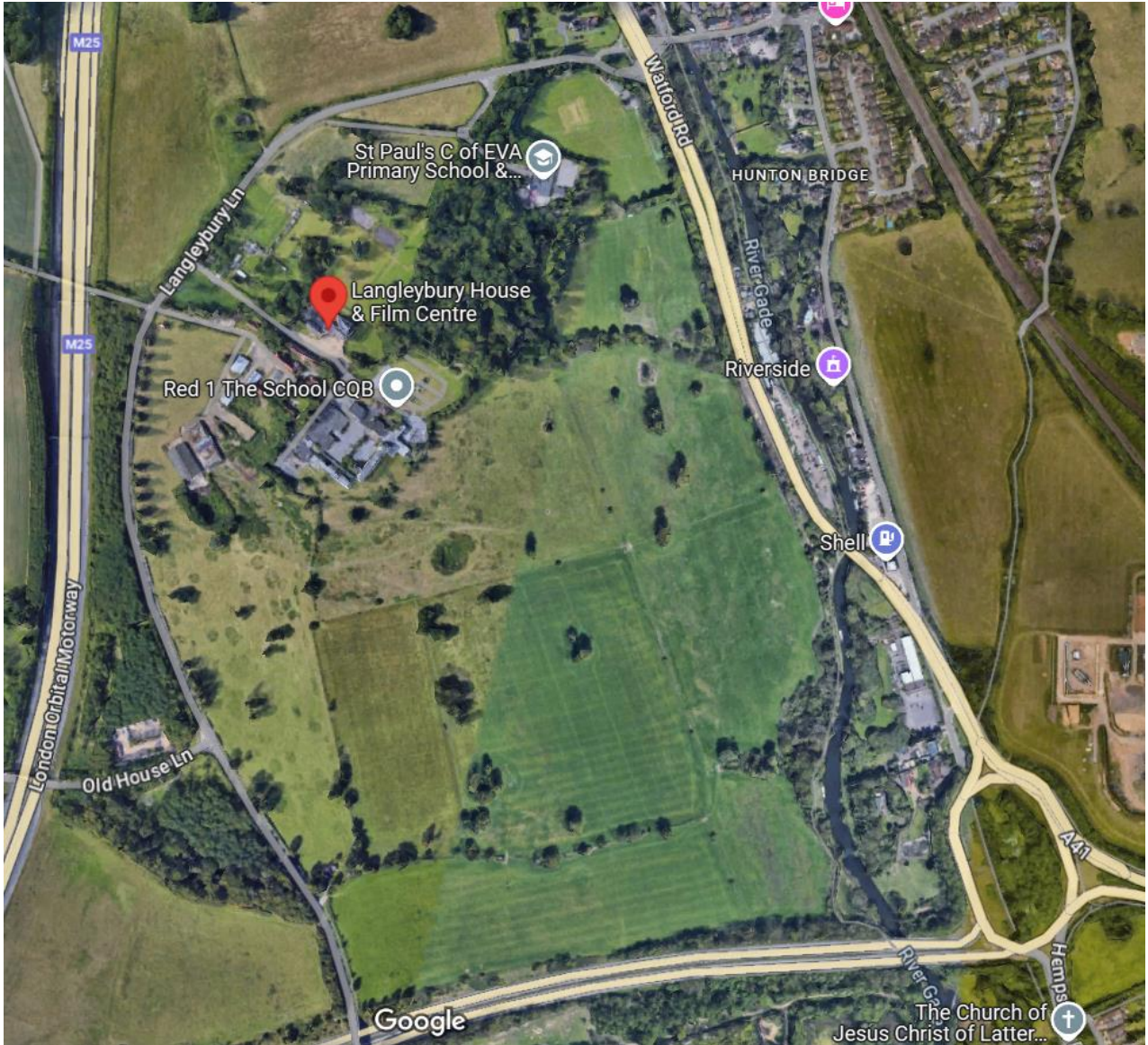
Views from the north east of the site



Picture taken from the publicly accessible open land to the east of the Old Mill Road



Picture taken from Old House Lane



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