

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 be 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.