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Standing up for Hertfordshire's countryside

Suzanne O'Brien Development Management Three Rivers District Council Three Rivers House Northway, Rickmansworth Herts. WD3 1RL

Our Ref:

Your Ref:

27th September 2023 (by email)

Dear Suzanne O'Brien,

Application no. 22/1945/FUL

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

I write with regard to the above application to which CPRE Hertfordshire objects strongly for the following reasons.

- The land identified for this proposed development is designated as London Metropolitan Green Belt in the Three Rivers Core Strategy where development is seen as inappropriate unless very special circumstances are identified which clearly outweigh the harms caused, according to criteria in the National Planning Policy Framework (NPPF). CPRE Hertfordshire is very aware of the negotiations which have taken place with regard to this proposal and that the Applicant quotes the Local Planning Authority (Planning) Policy Officers: "the development of a film hub on this site can be considered as very special circumstances" (paragraph 4.8 Planning Update Statement, July 2023).
- 2. We disagree profoundly with this statement by the Council's Policy officers and note that this opinion was provided in October 2022. Subsequently, detailed work has been

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taking place on the emerging Three Rivers Local Plan which will soon be subject to Regulation 18 public consultation.

- 3. Similar recent local plan consultations in neighbouring authorities, Hertsmere and Dacorum, have received record-breaking responses with regard to the proposed allocation of sites for development on the Green Belt. It is reasonable to suggest that, in the present context, similar levels of response will occur which should lead to a reassessment of the role and function of designated protected land such as Green Belt and the value and benefits of open countryside.
- 4. The Government's commitment to maintaining the Green Belt has also been expressed frequently recently in Ministerial statements, responses to Parliamentary questions, and in the Levelling Up and Regeneration Bill presently under consideration. The "Levelling Up and Regeneration Bill Policy Paper: Further information" re-emphasises the Government's support for protection of the Green Belt as follows:

"the increased weight given to plans and national policy by the Bill will give more assurances that areas of environmental importance – such as National Parks, Areas of Outstanding Natural Beauty...- will be respected in decision on planning applications and appeals. The same is true of Green Belt, which will continue to be safeguarded." (Creating beautiful places and improving environmental outcomes; In the Bill: LURB Policy paper, May 2022)"

5. Further,

"Existing Green Belt protections will remain, and we will pursue options to make the Green Belt even greener." (Creating beautiful places and improving environmental outcomes; Alongside the Bill: LURB Policy paper, May 2022)

- 6. In addition, the Levelling-Up and Regeneration Bill seeks to rebalance economic activity to locations where it is needed most, and away from areas which are already under significant pressure from development. This is clearly the case in southern Hertfordshire and modern commercial and industrial activities, including film-making and related uses, need not be limited to specific locations.
- 7. The nature of employment is changing rapidly and this can permit much more flexibility with regard to the location of modern high tech industries and commerce. The benefits asserted by the developer relate to economic issues, "natural capital and sustainability" and "public benefits", all of which can exist elsewhere with significantly less harm to protected countryside.
- 8. The pressures on open land in southern Hertfordshire are relentless, both from residential and commercial development and very considerable concerns are expressed



regularly by local communities at further development in the Borough's highly valued protected countryside. We support the expression of these concerns with regard to the loss of protected countryside and note that the constant onslaught on designated land such as Green Belt is bringing the planning system into disrepute. We urge the Council to refuse permission for this application.

Yours sincerely,

Chris Berry Planning Manager

NOTE: We would request that this letter is published on the Council's website as a document relating to this application and should be grateful if you would notify us of the date of the appropriate meeting if it is to be determined by planning committee.