

Examination of Three Rivers Site Allocations Local Development Document

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Dear Mrs May,

Examination of Site Allocations Local Development Document (SALDD) Leavesden Studios (In the context of Issues 1 and 2)

At the end of the Examination hearing sessions last week I undertook to write to the Council at an early date and under a separate head from the more comprehensive letter I intend to write later this month concerning a range of matters about which I have outstanding concerns and which would also affect my ability to return a conclusion of soundness. The purpose of such correspondence is to inform the necessary main modifications that you intend inviting me to recommend.

The reason for writing separately today is that the interaction between the matter of the Green Belt boundary in the vicinity of the Leavesden Studios and my other concerns regarding the SALDD is limited. As it is therefore effectively a discrete concern, and one which I anticipate you may wish to share with Watford Borough Council, whose area of jurisdiction is contiguous with your own in this vicinity, I perceive advantages in apprising you of my detailed thoughts, in writing, in advance of a more wide-ranging letter concerning other matters relevant to soundness.

At the opening day of the hearing sessions, in considering Issues 1 and 2, it was very evident that the anticipated need to use 'The Island' site for the further development of the Leavesden Studios is crystallizing and that, moreover, the scope for expansion and redevelopment within and around the Studios site requires maximization, notwithstanding that the open area of land known as the "Backlot" should be retained in the Green Belt long term as an integral part of the current WBSL operation, compatible with that status. It was indicated by those representing the Council at the hearing sessions that they therefore saw the logic not only of removing the relevant fringes of the developed area of the Studios from the Green Belt, namely sites 1 and 2 on the Map B (TOR 3) submitted by WBSL, but also site 3 ('The Island') and site 4 (an area of publicly accessible open space that the company suggests should be permanently devoted to that

purpose and allocated in the SALLD accordingly), reflecting the fact that the latter would in practical terms be severed from the altered Green Belt by the anticipated development of 'The Island' site.

The rationale for excluding the Leavesden Studios development sites from the Green Belt, thereby avoiding the uncertainty and unnecessarily onerous complication of demonstrating very special circumstances on sites clearly envisaged and apparently supported for employment development would be consistent with the approach (now proposed to be taken) to the employment land allocated at Maple Cross in the interests of soundness, certainly if the sites (other than site 4) were to be positively allocated for the Leavesden Studios operation, specifically, (which I believe they should be) rather than simply removed from the Green Belt with no positive allocation. Moreover, I consider the boundary suggested on Plan A (TOR 2) to be clearer and more rational with regard to the relevant parts of paragraph 85 of the Framework than that currently envisaged by the Council's pre-hearing letter to me of 31 July 2013. In short, the suggestion would represent a robust and defensible boundary to the Green Belt at this location.

To address the Leavesden Studios site in the manner suggested seems to me not only a positive approach but also one which would remove a significant doubt regarding soundness which has been raised, and which I share. I would therefore commend the approach to the Council. It seems to me pointless to persist with the retention of land in the Green Belt that is apparently supported for, and virtually certain to be ultimately used for, 'inappropriate' development simply to provide "control over future development" (SA CD5) notwithstanding that the Leavesden site is considered by the Council to be a significant one in a sensitive location. The necessary control can readily be exerted through the normal operation of the development management process having regard, amongst other things, to the principles embodied in section 7 of the Framework (*Requiring good design*) and policy CP12 of the Core Strategy, together with any supporting text for the allocation in the SALLD which the Council may consider necessary. (For example, it may be felt necessary and desirable to make it clear that any development of Site 1 must provide for the adequate landscaping of its western and northern boundaries in the interests of the visual amenity of the adjacent Green Belt, and similarly 'The Island' site itself could be indicated as one where the treatment of particular boundaries would require special attention.)

In commending the approach to the Council I am conscious that the Council's boundary with Watford bisects sites 3 and 4 and that this would arguably pre-determine Watford's approach, as this purely administrative boundary would be meaningless in Green Belt terms.

That, it seems to me, is a matter to be taken up by the Council in co-operation with Watford Borough Council, which I understand to be supportive of the Leavesden Studios and their potential to maximize their contribution to the local and national economies.

The Core Strategy at policy CP11 recognises the need to review the Green Belt boundary at Leavesden having regard to the important contribution the site is expected to make to meeting needs for housing and employment. The major housing development envisaged has now occurred and the Council has recognised that it would have been anomalous to leave it in the Green Belt. The employment potential remains constrained, however, and for the above reasons this seems to me unsound, bearing in mind not only the importance of maintaining the integrity of Green Belt policy as my pre-hearing letter of 10 July 2013 explained (albeit with reference to housing and school buildings) but also the intentions of Core Strategy policy CP6 regarding employment and economic development and those of the Framework to build a strong, competitive economy, notably as articulated in paragraphs 18-21.

I have no doubt that the Council will wish to consider the matter with a view to inviting modification(s) along the lines indicated above and discussed at the hearing.

In summary, to meet my concern, I consider the relevant areas of land should be removed from the Green Belt and allocated for the Leavesden Studios operation and open space, as appropriate.

Yours sincerely

Keith Manning

Inspector