

**Issue 1**

1. ***Whether the SALDD has been positively prepared and whether, overall, it will deliver sustainable development in accordance with the broad thrust of the National Planning Policy Framework ('the Framework')***

***Q1.6 Whether the SALDD is sufficiently responsive and flexible to achieve the required amount of sustainable development over the plan period?***

***Q1.7 Whether the SALDD is complementary to and consistent with the Core Strategy and the Development Management Policies Local Development document (DMPLDD).***

- 1.1 We respond to Issue 1 specifically in relation to green belt matters and the need to make further necessary changes to the green belt at Warner Bros. Studios Leavesden (WBSL). (This is covered further in response to matter 2.)
- 1.2 The council's approach is inconsistent with the requirements for positive planning including the requirement at paragraph 85 of the NPPF to meet identified requirements for sustainable development. The council's current proposals for revisions to the green belt (as confirmed in letters to the Inspector dated 30<sup>th</sup> and 31<sup>st</sup> July and 8<sup>th</sup> August 2013) continue to constrain the future short and long term development needs of WBSL, compromising this nationally important employment site. This restrictive approach prevents the sustainable growth and development of this important site.
- 1.3 The council's approach to the green belt boundary at Leavesden is flawed and contradicts the pattern of development which has already occurred and WBSL's future development proposals for the site as shared with the council. It is insufficiently responsive and flexible and will constrain sustainable development at WBSL over the plan period. The green belt review is far too tentative and does not meet the requirements of the plan period for this site notwithstanding the longer-term development needs of the site. The SALDD therefore does not meet the requirements of para 85 of the NPPF and at the next review of the local plan there will undoubtedly be a requirement for further green belt releases. It is clear that the council has ignored this requirement of the NPPF and has not therefore satisfied itself that green belt boundaries will need to be altered at the end of the development plan period.
- 1.4 The SALDD also fails to accord with the adopted core strategy, particularly policies PSP2 and CP11, in that it fails to make the necessary revisions to the green belt boundary in order to ensure that the existing and future (0 – 10 years) development needs of this nationally important employment site are not compromised.

***Conclusion:***

- 1.5 In summary,

- (a) WBSL welcomes the council's further review of green belt boundaries at Leavesden and supports the removal of the Studios from the green belt.
- (b) However, the council's proposed amendment to the green belt boundary at GB(1) does not go far enough. WBSL therefore maintains its objection to the proposed green belt revision, as it continues to fail to accord with the recently adopted core strategy, particularly policies PSP2 and CP11, in that it fails to make the necessary revisions to the green belt boundary in order to ensure that the future development needs of this nationally important employment site are not compromised. It also fails to comply with the requirements of the NPPF, specifically paragraphs 14,19, 20, 21 and 85. The result of the council's proposed amendment is that the draft policy is not considered to be sound and is not justified, as it fails to remove all of the developed area of the Studios and the Island Site (future expansion land) from the green belt.
- 1.6 The importance of the Studios site (Leavesden Aerodrome site) in meeting the employment and housing needs of the district through a comprehensive mixed-use redevelopment remains key to the successful delivery of core strategy objectives.
- Proposed policy amendments**
- 1.7 The Site Allocations DPD should be amended to reflect the continuing importance of the Studios to the national and regional economy, both as a local employer and as a centre intended to contribute to the economic growth of the district for the plan period, as set out in core strategy policies PSP2, CP11 and paragraph 5.106. **In order to satisfactorily do this, the green belt should be revised as shown on the enclosed plan:** WBSL revised green belt Plan A (See Matter 2 Appendix 1 Plans). In addition parcel 4 should be allocated as public open space under policy SA5 to ensure this land remains protected from built development.
- 1.8 We also refer to Plan B showing the council's proposed amended green belt boundary superimposed on a site layout plan, which clearly highlights anomalies with the council's approach and the lack of readily recognisable and permanent boundaries. An aerial photograph dated July 2012 supports this position. In addition we enclose an updated indicative master plan (showing new building works completed and future expansion plans).