



ISSUE 5 - LANGLEYBURY AND THE GROVE

Whether the approach anticipated for Langleybury and The Grove (Policy SA7) is appropriate in the context of relevant policy.

Introduction

1. This Statement is made on behalf of Ralph Trustees Limited (RTL), the owner and operator of The Grove Hotel and owner of the Langleybury Mansion (a grade 2* listed building on the Heritage at Risk Register) the redundant secondary school, and other land shown in the Development Brief (Development Brief page IV).
2. RTL supports the SALDD and considers that it is sound in respect of policy SA7 and related housing allocation H10.
3. We have been encouraged by TRDC to participate at the Examination on issue 5, given RTL's longstanding involvement in the formulation of SALDD Policy SA7 and Allocation H10, and the Development Brief (SD50), in the context of RTL's development aspirations for the Langleybury and The Grove Estates.
4. Accordingly, we set out our observations on the questions raised under issue 5, in order to assist the Inspector and the Examination.

Background

5. The Grove, since opening in 2003, has become a leading 5 star resort and is recognised as one of the best hotel and spas in the world. It is an important economic asset to the local area and region, providing a source of stable employment for over 500 staff as well as generating considerable local and regional supplier spend.
6. The Grove also plays an important role in promoting the local area and region on an international stage by attracting leading international organisations such as Google,



- Deutsche Bank, HSBC and Warner Bros., as well as providing a base for the England football team and visiting NFL Super League Teams, before matches at Wembley.
7. The principle of residential reuse of the Langleybury mansion and residential redevelopment of the former school buildings dates back to TRDC's 1995 Planning Brief. A housing allocation on the Langleybury House/School Site was initiated in TRDC's Core Strategy Preferred Options (SD03) consultation in Spring 2009 (Table 1, Site 13) which was taken forward at the start of the consultation on the SALDD (SD44, November 2010). TRDC has consistently promoted residential development on the disused school and mansion elements of the Estate, originally showing an indicative dwelling capacity of 60 / 75 units.
 8. The idea of a Development Brief was initiated in May 2011, in advance of the Core Strategy Examination, at which RTL was originally an objector. RTL and TRDC agreed that the most appropriate way to plan for the future at both The Grove and Langleybury was as follows:
 - *"TRDC to prepare separate Site Allocations for The Grove and Langleybury sites, for inclusion in the Site Allocations DPD Preferred Options consultation stage (Autumn 2011). The Langleybury Site Allocation will specifically examine the suitability of the site for housing and economic development uses.*
 - *"To inform the Site Allocations DPD, TRDC, in conjunction with RTL and other stakeholders, is to prepare a Planning Brief for both The Grove and Langleybury sites (during June to August 2011) to set out the parameters for development and the types of uses envisaged. This Brief would address the unique characteristics of each site and the economic development opportunities which exist."* (RTL and TRDC Joint Core Strategy Examination Statement, NLP letter 23.5.11)
 9. This approach was welcomed by the Inspector at the Core Strategy Examination, albeit she did not comment on it in her 16 September 2011 report.
 10. RTL has closely worked with TRDC and liaised with other stakeholders (e.g. English Heritage (EH)), on the preparation of a holistic Development Brief covering and linking the two sites, leading to its adoption (SD50, June 2012).



5.1 Whether the adopted development brief and SALDD are mutually consistent.

11. The SALDD Policy SA7 and allocation H10 were initiated prior to the commencement of the Development Brief. The Development Brief has informed the content of the SALDD Policy SA7 (page 68) and H10 (page 12) during the course of TRDC preparing the Proposed Submission (SA CD 1). It also sets out the guidelines / parameters for future proposed development at the development management stage.
12. The SALDD will provide the statutory development plan framework for Langleybury and the Grove. The Development Brief will supplement Policy SA7 and Housing Allocation HA10, by providing guidance on the nature of specific proposals at the development management stage.
13. Both the SALDD (para 10.5) and Development Brief (page 1) recognise that the future restoration and enhancement of the Langleybury Estate is best linked to the use and operation of The Grove, given the similar planning considerations, landownership, physical proximity and potential uses on the sites.
14. SALDD SA7 acknowledges the need for change at both sites and indicates:
“Appropriate uses on the Langleybury site are hotel / leisure development and residential Appropriate uses on The Grove site will be hotel / leisure use.” The Development Brief identifies hotel / leisure development as the preferred use at Langleybury, and that residential is also an appropriate use. For The Grove it similarly identifies hotel / leisure as appropriate (Development Brief p15).
15. Policy SA7 supporting para 10.8 identifies the ‘main proposals’ for the Langleybury site to include: *“...the removal of the old school buildings, refurbishment and extension of Langleybury House to hotel use and some residential (around 20 homes) and new leisure development in the least sensitive parts of the site.”* The location of these uses is also consistent with the parameters provided within the Development Brief (pages 15 & 24/27) and the indicative development concept (pages 29/31). Both SA7 and the Development Brief promote hotel and residential uses at Langleybury.



16. Policy SA7 and H10, like the Development Brief, do not identify the proportional split of demolished building footprint to be transferred between The Grove and Langleybury. That is the correct approach, as neither the Allocations nor the Brief should be so prescriptive. They both encourage a distribution of the demolished building footprint to less sensitive Green Belt and heritage locations at Langleybury (i.e. a 'policy compliant' approach), and The Grove (i.e. a 'policy compliant plus' approach, delivering even greater public heritage benefits at Langleybury).
17. Thus, the reduced scale of new build dwellings proposed in H10 allows for a transfer of footprint to The Grove. Such an opportunity is only deliverable through RTL's ownership of both sites.
18. The concept masterplan contained within the Development Brief (page 30) identifies how that footprint might be appropriately distributed. However, the indicative quantum of housing (i.e. around 20 homes) is, quite properly, provided in the SALDD, and is consistent with the guidance in the Development Brief indicating an element of residential development on the former secondary school site.
19. Thus, the Development Brief and the SALDD are mutually consistent.

5.2 Whether the SALDD is consistent with national policy in respect of heritage assets

20. The NPPF & draft NPPG seek to sustain and enhance heritage assets and put them to viable uses. The NPPF (para 126) requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets at risk (e.g. Langleybury Mansion).
21. Ordinarily SALDD policy SA7 could have provided separate positive strategies for Langleybury site which would have been consistent with the NPPF. However, linking it with The Grove provides a more creative approach capable of achieving a far greater reduction in the amount of unsightly development affecting the setting of Langleybury Mansion, a grade 2* listed heritage asset.



22. EH recognises that, through the redevelopment of the Langleybury Estate, there is an opportunity to achieve the repair and reuse of the grade 2* Mansion and other heritage assets, and the potential to significantly enhance the setting of these assets which have been degraded by the adjoining, dominant and poorly designed former Secondary School. Furthermore, EH appreciates that this only achieved by a positive strategy of 'trading' development, considering this to be *"justified by the exceptional circumstances pertaining to the highly graded historic building at risk."* (SA CD5a Rep 6017)

23. However, instead of welcoming such a 'policy compliant plus' approach, EH seeks all new development replacing demolished building footprint to be used to facilitate the expansion of The Grove business. There is no heritage policy justification for such an approach which is effectively turning the opportunity of trading built footprint 'on its head'. Furthermore, as there is no economic reason for this scale of development at The Grove, nor any evidence that such an extent of new building footprint is achievable, there is no realistic prospect of this being deliverable anyway.

24. Sustaining and enhancing the significance of the Mansion, securing an appropriate and enduring viable reuse, removing it from being at risk and making a positive contribution to its setting, are all public heritage benefits (NPPG para 7) which, together with significantly reducing development which harms Green Belt openness, would be secured through development delivered in accordance with SA7 and H10. Furthermore, the opportunity to provide a new conference wing at The Grove would bring considerable economic benefits through enhancing this significant local economic asset.

25. These benefits are reliant on a comprehensive approach and RTL's ownership at both sites. These would not be achieved if the SALDD sought to restrict development to reuse of the Mansion (which is not viable by itself anyway) or if Langleybury was in separate ownership from The Grove.

26. It is therefore wholly unjustified to suggest all development must be hotel/leisure use and all demolished built footprint should be transferred to The Grove, when the uses and distribution that are encouraged by the SALDD and Development Brief will provide far more policy benefits than, consistency, with national policy alone.



27. Furthermore, the degree of compliance or otherwise with both national and local heritage policy is controlled at development management stage by the NPPF and Development Management Policies (DMP) LDD DM3.

5.3 Whether the anticipated housing and other development may be considered 'enabling' development

28. The housing proposed in H10 and the hotel / leisure development at Langleybury and The Grove comprise highly acceptable development (for the reasons set out in response to 5.2 above).

29. They cannot be considered to be 'enabling development' – i.e. *“Development that would be unacceptable in planning terms but for the fact that it would bring heritage benefits sufficient to justify it being carried out, and which could not otherwise be achieved”*. (PPS5, glossary)

30. On the contrary, this can be considered as 'facilitating' development, one that is far more than policy compliant, by delivering many heritage, Green Belt and economic benefits.

31. The Development Brief has not highlighted any other constraints to development on either site which cannot be overcome through careful and sensitive design as well as appropriate mitigation.

32. Thus, the anticipated development does not amount to 'enabling development', nor is any required.

5.4 Whether the proposed development as a whole may be considered sustainable

33. Sustainable development is about positive growth and has three dimensions – economic, social and environmental (NPPF foreword and paras 6/7). The sustainability of SA7 and H10 proposals must be judged as a whole against all the economic, social and environmental considerations, not solely from the perspective of the suitability of Langleybury as a location for housing. An holistic approach is required.



34. The Sustainability Appraisal (SA) which accompanies the SALDD (SA CD3 Appendix 7, pages 10 and 56) identifies a number of positive sustainability benefits of H10, namely:

- significant economic benefits through job creation and inward investment;
- heritage benefits through the restoration of the heritage assets at Langleybury;
- landscape benefits by enhancing the Green Belt, through the demolition of the former Secondary School buildings; and
- helping to achieve the District's housing target.

35. The only negative element which was identified in the SA and cannot be overcome through design or mitigation is the relationship of the proposed Langleybury housing site to local services and amenities. The site is not within the identified thresholds, but it is located adjacent to a local primary school and within walking distance of Hunton Bridge, which provides a local convenience store, a public house and bus services to Kings Langley, Abbots Langley and Watford.

36. This one element does not outweigh the weighty positive aspects of the allocation's sustainability and role in delivering Policy SA7, including its contribution to achieving the District's housing target and the significant economic benefits, when assessing Langleybury in isolation.

5.5 Whether the anticipated housing and other development would be regarded as inappropriate within the Green Belt or whether it may be regarded as not inappropriate

37. Whilst the construction of new buildings in the Green Belt is generally inappropriate by definition (NPPF para 89), the exceptions include:

"the extension or alteration of a building providing it does not result in disproportionate additions over and above the size of the original building", and

"limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development." (our emphasis)



38. Both the small scale extensions and infill development at The Grove, and redevelopment of the former Secondary School site at Langleybury for housing (H10) or other development, would be likely to fall under these exceptions, and thus would comprise acceptable development within the Green Belt, so long as they would have no greater impact on Green Belt openness. The Development Brief demonstrates how the careful siting of any new development could achieve this requirement.
39. For the additional development at The Grove which would, by definition, be considered 'inappropriate' Green Belt development, there is potential for a 'very special circumstances' case to be established (Development Brief p17) to justify any such development. This would be principally based on the benefits to the Green Belt from the demolition of the prominent and visually intrusive former Secondary School buildings at Langleybury, combined with the economic benefits.
40. The detailed assessment of whether development proposed is 'inappropriate' or 'not inappropriate' is a development management matter controlled by the NPPF and DMP LDD DM2.