Issue 2

2. Whether the SALDD addresses necessary changes to the Green Belt boundary in the appropriate fashion.

The following matters in particular are germane:

Q2.1 Whether the council’s signalled intentions to now remove most allocated edge of settlement sites from the Green Belt, having regard to the need to deliver housing and other forms of development, are sufficient to accord with the intentions of the Core Strategy in that respect.

Q2.2 Whether the SALDD is too tentative in its approach to altering the Green Belt boundary, as has been suggested, or whether the circumstances of Three Rivers justify a cautious approach focused primarily on the plan period itself.

Overview

2.1 No, the SALDD does not address the necessary changes to the green belt boundary in the appropriate fashion nor do the proposed changes accord with the intentions of the Core Strategy with respect to green belt.

• The council’s green belt proposal with respect to WBSL is flawed and fails to meet the requirements of paragraph 85 of the NPPF.

• The council’s review of the green belt has not sufficiently analysed the potential of land at WBSL to meet future economic and employment needs and is not positively prepared, sound or justified.

• The council’s tentative approach does not accord with the requirements of the NPPF to secure an enduring green belt boundary. Insufficient land has been released from the green belt at WBSL to allow for the development needs of the Studios during the plan period let alone beyond.

• Sustainable development at WBSL will not undermine the objectives of the green belt, in this location, this position has in the past been agreed by the council, as confirmed by decision notice 10/0080/FUL and 10/00051/FUL in association with the redevelopment of the studios In 2010, and 10/2230/OUT in association with a development in the order of 240 dwellings at Leavesden Park.

• In concluding that the revised green belt boundaries now proposed by the council at Leavesden form a readily recognisable and permanent boundary the Council is mistaken. Rather, the principal physical features of the locality in combination (including Aerodrome Way, Studio Tour Drive and the ditch that forms WBSL property boundary to the north-west) afford a more robust and permanent new boundary to the urban edge and green belt as shown on Plan A at Appendix 1. The council’s approach to the green belt boundary around Leavesden is unsound as it fails to meet the tests of NPPF para 85.

1 Letters to Inspector dated 30th and 31st July and 8th August 2013
Policy support for WBSL proposed changes

2.2 Policy CP11 (d) of the core strategy (2011) confirms the council will “Review ‘Major Developed Site in the Green Belt’ status in relation to Leavesden Aerodrome, having regard to the important contribution the site is expected to make to meeting needs for housing and employment.”

2.3 In relation to the former Leavesden Aerodrome the Core Strategy specifically states at Para 5.106: “With regard to Leavesden Aerodrome, the Council recognises the importance of the site in meeting future housing and employment needs as shown by the recent planning application to extend Leavesden Studios and previous public consultation on allocating housing development at the site. The Major Developed Site in the Green Belt status currently limits the scope to achieve both the extension to the Studios and development for housing and associated community uses. Therefore in order not to compromise the ability of the site to contribute to future development needs, the council will review the green belt designation and Major Developed Site status as part of the Site Allocations Development Plan."

2.4 As a result, Policy CP11 binds the council through the Site Allocations DPD to make the necessary revisions to the green belt boundary in order to ensure that future development needs are not compromised.

Compromising the development needs of a nationally significant site

2.5 Whilst the council’s recent modifications\(^2\) to remove further land at WBSL from the green belt are welcomed they remain irreconcilable with the recent planning history of the site and the policies of the Core Strategy in that they do compromise the future development needs of the site. It is inconsistent for the council to continue to take a partial approach to green belt review on this important strategic site. The council’s approach is not in accordance with para 85 of the NPPF and remains flawed and unsound. (Appendix 2 provides detail on the background to the site, recent relevant planning history and planning policy.)

2.6 The revised boundary remains too tightly drawn around the Studios, incorrectly identifying the extent of the Studios built development, which is more significant than indicated on the council’s plan, see Appendix 1 enclosed aerial photograph dated July 2012, and indicative masterplan which highlights recent development completed since this date and future development plans. Land parcel 1 as shown (on Plan B) is developed land currently comprising studio offices and production space, redevelopment proposals for this part of the site have already been developed in conceptual form. Parcel 2 is the Studio Tour car park, it is developed land that does not contribute to the objectives of the green belt.

2.7 By drawing the boundary so tightly around the Studios it does not allow future development needs within the plan period to be accommodated or give WBSL the confidence and certainty that they require to continue to plan, operate, manage and continue to invest in and expand the Studios in the future. It is of vital importance that Warner Bros. is given the appropriate level of flexibility and certainty to do this.

\(^2\) Letters to Inspector dated 31st July and 8th August 2013
2.8 WBDSL has provided robust evidence to demonstrate the important and significant contribution that WBDSL makes to the local, regional and national economy and the ability of WBDSL to attract other key supply-chain businesses to the local area. (See Appendix 3). In light of the presented evidence it is appropriate that the green belt designation is revised as shown on Plan A to take account of the economic realities of the situation, namely:

(i) the important and significant contribution that WBDSL makes to the local, regional and national economy;
(ii) the ability of WBDSL to attract other key supply-chain businesses to the local area;
(iii) the confidence and certainty that Warner Bros. requires to continue to invest in the management and operation of the Studios.

2.9 Green belt policy remains one of the strictest planning controls over development. The revised policy remains unreasonably onerous, at odds with the realities of the position ‘on the ground’ and contrary to Policy PSP2(d) and CP11 of the core strategy (2011). It would have the direct effect of creating a barrier to further investment, particularly from those key supply-chain businesses that would otherwise gravitate towards this core industry facility.

2.10 The retention of the green belt designation in this location as proposed by the Council, would mean proposals for development works falling within the built part of the Studio site yet within the green belt could only be justified if very special circumstances were demonstrated as an exception to well established green belt policy. This would impose considerable restraint involving a high degree of uncertainty, inflexibility and delay to any such development proposal and impose an unacceptable level of restraint on Warner Bros. business operations such that it may lead to an inability to fulfill its potential. A fetter of such a scale on an economic asset of such importance should only be imposed or retained where it can be fully justified.

Green belt review – The Island site – Compromising future expansion

2.11 It is also important that future expansion opportunities, provided by the Island Site (land parcel 3 as shown on Plan B and owned by WBDSL) are not similarly constrained by the green belt designation, such that it may meet the changing needs of WBDSL and the film and television industry to which WBDSL must respond. The nature of the film and other creative industries is by necessity very reactive and if WBDSL is to remain at the forefront of filmmaking in the UK it must be given the flexibility to respond quickly to changing circumstances and expand to meet industry demand.

2.12 Since Warner Bros. purchased the site in 2010 the site has seen considerable expansion, improvement and consolidation, which has gone beyond the level anticipated by the original redevelopment plan. Following completion of the initial redevelopment works in 2010 and the addition of J and K stage (the Studio Tour), 2011 saw the development of the new mill and workshop buildings, whilst in 2012 and 2013 the redevelopment of the flight shed, a further new workshop and a 76 x 76 sqm water tank for exterior filming have been consented and built to provide additional production space and augment the existing facilities at the studio. Planning applications for the extension of J stage and two further sound stages in the northern part of the site are also in preparation for submission this
autumn for immediate construction. This requirement for new development is unlikely to diminish in the short term whether it be for dedicated studio space, office or production space, support facilities or associated studio-related uses by WBSL or third parties. Now that the existing site is reaching capacity the business plan requires land to be available on the Island site to meet future development needs and provide the flexibility of space to accommodate the needs of an expanding and highly successful part of the economy. To this end, WBSL offers a very unique set of constraints to overcome.

2.13 We draw the Inspector’s attention to paragraph 2.4.5 of the Watford Core Strategy, which recognises the “nationally important Leavesden Studios”. In the context of paragraphs 19, 20 and 21 of the NPPF it is not appropriate for this nationally significant employment site to be constrained. Paragraph 21 makes clear that policies should be flexible to accommodate rapid responses to change and “plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries” (para 21 bullet 4). The revisions to the green belt outlined by the Council do not reflect government commitment to ensuring that the planning system does everything it can to support economic growth (para 19).

2.14 The Island Site is required by WBSL as a future expansion site for the Studios to accommodate film, media and other associated studio related uses, and is seeking its removal from the green belt as shown on Plan A and C at Appendix 1. Such release would enable WBSL to bring forward the future development of a film and media technology park on the Island Site, together with associated studio related uses. With the ever-increasing application of new technology and digital effects to film production, there is a strong demand for the full spectrum of pre and post-production services and other uses related to the studios to be accommodated on site. The ability to provide these facilities in such close proximity to the Studios will provide a world-class environment to support the existing range of film facilities provided on site enabling the Studios and the Island Site to fulfill their role as a strategic employment site.

2.15 It is anticipated that Warner Bros. will take forward development on the Island site within five years. By retaining the Island Site within the green belt this would have the direct effect of creating a barrier to further investment, particularly from those key supply-chain businesses that would otherwise gravitate towards this core industry facility.

Green belt review – Meeting the tests of NPPF para 80 and 85

2.16 By any objective measure, neither the Studios (in its entirety excluding the Backlot as shown on Plan A), nor the Island Site contribute to the purposes or objectives of green belt land and, as such, should be removed from the green belt, as the designation no longer serves any useful purpose. See Appendix 4, which provides a review of the Studios and Island site against NPPF para 80 green belt purposes. We note that the exceptional circumstances to justify the revision to the green belt boundary have already been accepted by the Council.

2.17 The reality is that the future of both sites has been determined by the grant of the two major planning permissions (10/0080/FUL and 10/2230/OUT) and the terms of their conditions and s106 obligations. It is plain in the case of the studio site that the site, aside from the backlot, does not continue to serve any green
belt purpose or objective and to maintain the fiction that it does so by retaining it within the green belt would serve no useful purpose and would tend to “compromise the ability of the site to contribute to future development need” as the authors of the Core Strategy foresaw in para 5.106 of the text supporting policy CP11.

2.18 Under the heading Reason for Change under site AGB (1) the Council state:

“Current green belt boundary includes area already developed which does not contribute to Green Belt objectives. Proposed boundary removes existing development at Huntonbury Village, Leasden park, Hill Farm Avenue and Leasden Studios from the Green Belt. On the Leasden Studio site, only the studio buildings and immediately surrounding areas of hardstanding are proposed to be removed from the Green Belt. Retaining Green Belt designation on the rest of the Studios Site provides control over future development of this significant site.”

2.19 The only reason given within the pre-submission (Additional Sites) DPD for the failure to release all of the Studios site (excluding the Backlot) and the Island Site relates to the council’s desire to control the future development of the site. Given that planning permission for the Studios was granted as an exception to established green belt policy by reference to the very special circumstances test, and that neither the Island Site nor the Studios site meets the purposes or objectives of green belt land, this has no justification in national policy and is perverse. In addition, the Council has the full range of statutory planning controls at its disposal to effectively and reasonably control future development of the site.

2.20 Green belt boundaries are required to be defensible and endure. The revised boundary proposed by the Council meets neither of these tests and is not sound, unlike the readily recognisable and clear physical boundaries proposed by WBSL shown on Plan A at Appendix 1 that are in accordance with NPPF para 85. The revision of these boundaries as shown on Plan A will ensure that WBSL is able to continue to make its vital contribution to the economy of the District for the plan period. The new boundaries, in accordance with the NPPF, will provide a green belt boundary that will endure, with Aerodrome Way, Studio Tour Drive and the ditch that marks the Studios north-western boundary providing a robust boundary edge. The new boundaries will not have any adverse impact upon the integrity of the green belt nor its ability to fulfill its defined purposes.

**Conclusion:**

2.21 In summary,

(a) WBSL welcomes the council’s further review of green belt boundaries at Leasden 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.

2.22 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

2.23 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. In addition parcel 4 should be allocated as public open space under policy SA5 to ensure this land remains protected from built development.

2.24 We also refer to revised plans showing the council’s proposed amended green belt boundary superimposed on a site layout plan, which clearly highlights anomalies with the council’s approach. 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) and summary tables 1 and 2 below.
<table>
<thead>
<tr>
<th>Appendix</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Appendix 1</td>
<td>Plans</td>
</tr>
<tr>
<td>Appendix 2</td>
<td>Site background, planning policy and planning history</td>
</tr>
<tr>
<td>Appendix 3</td>
<td>Contribution of WBSL to the economy – national and local benefit</td>
</tr>
<tr>
<td>Appendix 4</td>
<td>Meeting green belt objectives</td>
</tr>
</tbody>
</table>
Appendix 1
Plans

<table>
<thead>
<tr>
<th>Plan</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plan A</td>
<td>WBSL revised green belt</td>
</tr>
<tr>
<td>Plan B</td>
<td>TRDC proposed revision to green belt</td>
</tr>
<tr>
<td>Plan C</td>
<td>Illustrative masterplan</td>
</tr>
<tr>
<td><strong>Plan D</strong></td>
<td>Aerial photo dated July 2011</td>
</tr>
</tbody>
</table>
Appendix 2
Site background, planning policy and planning history

The studios site is located on the former Leavesden Aerodrome which, in broad terms, is located between the built up areas of Abbots Langley and Watford / Leavesden. It lies predominantly within the administrative area of Three Rivers District Council (TRDC), although a small proportion of the sites lies within an areas of Watford Borough Council.

The former Leavesden Aerodrome site ("the Site") comprises a significant number of buildings and land owned by WBSL. This includes the WBSL Studios ("the Studios"), a large backlot area ("the Backlot") which is used for filming and an undeveloped area of land to the south east of the Site ("the Island Site"). The balance of the Site has been developed for commercial use ("Leavesden Park") and is being developed for residential use ("the MEPC site") under outline planning permission 10/2230/OUT.

The Site has become an anomaly within the green belt. Originally, the green belt washed over the whole of this former WWII aerodrome. Later, when it became a major source of employment for the manufacture by Rolls Royce of helicopter engines, it was designated a Major Developed Site (MDS) in the green belt and was recognized as such in the Three Rivers District Local Plan of 2002. The Local Plan (2002) recognised the Site as "one of the most important employment and mixed use sites in the County. It is a very important site in the economy of this part of Hertfordshire" (para 7.19).

Historically development of the Site was governed by the terms of a planning brief approved in September 1993 by the three relevant local planning authorities: Hertfordshire County Council, Watford Council and TRDC and entitled "Rolls Royce Site Leavesden". That non-statutory or informal policy document was designed to guide the redevelopment and use of the site with a total area of 119ha, particularly for the then new film studio use, in accordance with the familiar precepts of annex C to PPG2 ‘Green Belts’ and its predecessors, particularly as a Major Developed Site in the Green Belt.

In 2010 and 2011 the council granted planning permission for two significant developments within this sector of the green belt. First, it approved the permanent use of the Studios for film production and related activities and the necessary building work to support that use (application 10/0080/FUL). Second, the council granted permission for 425 homes and associated uses in the green belt on the MEPC Site and use of land north of South Way for public open space (application 10/2230/OUT). In doing so, the council recognised that such developments could not be justified by reference to the MDS policies in PPG2 as any tolerance in the 1993 Planning Brief for further development had been used up. Nevertheless, both applications were approved, with the council in both instances following the guidance in PPG2 (para 3.2), namely, that the proposals were justified by very special circumstances that clearly outweighed the harm caused to the green belt and any other harm.

The report to committee on the MEPC application makes it plain that the proposal could only be justified by reference to the very special circumstances test”. Among these were identified “the contribution that the site would make to the delivery of economic growth in the district in conjunction with the previously permitted office and studio developments”, the latter being a reference to the studios permission. Another

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1 Report Para 7.2.19
2 Report Para 7.2.13
was the retention of a green wedge between Abbots Langley and Leavesden to protect against the coalescence of the settlements. The authors of the report were under no illusions as to the implications of the grant of permission “approval of the proposals would effectively pre-determine a minor part of the green belt review and Major Developed Sites re-designation envisaged by Policy CP11 of the submitted draft Core Strategy”\(^3\). We observe that the same is equally true with respect to the grant of permission on the studios site.

The TRDC Core Strategy adopted in October 2011 identifies the fact that Green Belt designation covers some 77% of the area of the District and records the need “to make some minor adjustments to the Green Belt boundary to accommodate growth in the most sustainable locations on the edge of existing settlements”\(^3\). One such location is the Aerodrome site where adjustment is deemed necessary as “the Council recognises the importance of the site in meeting future housing and employment needs as shown by the recent planning application to extend Leavesden Studios and previous public consultation on allocating housing development at the site”\(^4\). These are references to the above two major applications for planning permission made to TRDC which culminated in the grant of two planning permissions. This potential is also recognised, for example, in the text of policy PSP2 which directs development in the key centres of the District in these terms: “Recognise that the former Leavesden Aerodrome site which includes the nationally important film studios is anticipated to be significant in meeting needs for housing and employment through mixed use redevelopment. Specific proposals for the site will be included in the Site Allocations Development Plan Document.” Accordingly, Policy CP11, which relates specifically to the Green Belt, commits the Council to “Review ‘Major Developed Site in the Green Belt’ status in relation to Leavesden Aerodrome, having regard to the important contribution the site is expected to make to meeting the needs for housing and employment”.

These are the policies of the current statutory development plan which, by operation of section 38(6) Planning and Compensation Act 2004 are to be followed in the determination of planning decisions unless material considerations indicate otherwise. These are also the policies designed to frame the suite of LDF documents, including the Site Allocations DPD. However, the revised policy put forward by the council remains out of step with these policies of the Core Strategy.

WBSL has completed the development permitted under the 2010 permission and subsequent additional permitted development in the form of a new mill and workshop, an additional workshop and production rentals accommodation, and an exterior film tank for the shooting of sequences in water. In additional applications are currently being prepared for two further studio stages. Development is also being undertaken on the adjacent residential site.

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\(^3\) Above and 7.2.16
\(^3\) Para 5.1.1 and following
\(^4\) Para 5.106
Appendix 3
Contribution of WBSL to the economy – national and local benefit

Policy PSP2(d) and Para 5.106 of the TRDC core strategy (2011) acknowledge that the former Leavesden Aerodrome site (“the Site”) is one of the most important employment sites in the district. It also recognises the WBSL Studios (“the Studios”) and the backlot as a nationally important film studio with the ability to contribute to meeting the current and future employment needs of the district.

In 2010 WBSL invested approximately £120m in the redevelopment and expansion of the Studios in order to create Warner Bros. Studios Leavesden – a permanent UK film and television production base for the company – as well as establishing a Studio Tour that will give the general public a behind-the-scenes look at how the Harry Potter movie series was created. The Studio Tour opened in April 2012 with the refurbished Studio facilities opening in summer 2012.

Warner Bros.’ purchase makes it the only Hollywood studio to own and operate its own production facility in the UK and it has become one of the pre-eminent assets of the British film industry. Now representing nearly 40% of the UK’s dedicated studio space for major film production accounting for on average about 25% of UK inward investment production (attracting film production budgets of £704m in the five years between 2003 and 2008) and the home of the Harry Potter film sequence. Warner Bros.’ investment in WBSL will help sustain these levels of production activity and help enhance the country’s reputation for film making excellence. Since 2010 it is estimated WBSL has invested a further £10m in additional building works. The expansion of J stage and the two further sound stages that are in the pipeline represent further significant investment.

Warner Bros. is the biggest contributor to the film industry in the UK and has delivered on its employment promise to recruit locally. Since opening WBSL has directly recruited over 400 new employees, of which over 80% have been recruited from the local community. In addition over 200 staff are employed by third party contractors, many of which employ local residents for catering, cleaning and security jobs at both the Studios and the Studio Tour. In addition there are around 500 crew employed for each major production, with the potential for three major productions filming on site at any one time. This commitment to employ local people, coupled with Warner Bros.’ commitment to training all new recruits has resulted in a significant investment in skills and training in the local economy.

In addition to direct economic contribution, for every person employed in the core UK film industry a further job is created in an associated business. In this way the UK film industry helps support an additional 87,800 FTE jobs. Specifically at WBSL many local businesses are used as suppliers crossing a wide selection of services including transport, ground maintenance, printing, and cleaning. In addition both UK and overseas visitors to the Studio Tour have had a positive impact on the local economy by using hotels, taxi companies, restaurants etc.

The Warner Bros. Studio Tour – The Making of Harry Potter provides an exceptional contribution to both the UK and the London tourist industry, as it raises awareness of the film industry through the provision of a unique visitor attraction, encouraging and engaging with visitors to showcase the skills and expertise of the creative industries. Since opening the Studio Tour has welcomed two million visitors and has won various
awards including: Best UK Visitor Attraction – Group Leisure Awards 2012, the Outstanding Achievement Attraction award from the Themed Entertainment Association, the 2012 UKinbound award for Best Individual Attraction of the Year and a Certificate of Excellence from Trip Advisor.

The economic contribution of Warner Bros. in attracting inward investment both through the Studio Tour and through film production at Leavesden is clearly of national significance to the UK film industry.
Meeting green belt objectives

Paragraph 80 of the NPPF outlines the five purposes of including land within the green belt:

- checking the unrestricted sprawl of large built-up areas;
- preventing neighbouring towns from merging into one another;
- assisting in safeguarding the countryside from encroachment;
- preserving the setting and special character of historic towns; and
- assisting in urban regeneration, by encouraging the recycling of derelict and other urban land.

WBSL accepts that the Backlot assists in achieving these important objectives, as it remains essentially open. The report to committee on 10/0080/FUL recognised this: “the proposed extension of the backlot to the south east would retain the openness of the site” (para 7.6.7). WBSL is not seeking the removal of the Backlot from the green belt.

In contrast, neither the Studios nor the Island Site serve a justifiable purpose in accordance with Para 80 for including land within the green belt and therefore should be removed.

The Studios, (including that land to which WBSL seek the removal of green belt designation) is no longer open in character nor does it serve any of the identified functions of the green belt. The neighbouring built-up areas are separated, or are prevented from merging with each other, by other land within the green belt (owned by the council) and the Studios does not contribute in any way to this separation. This was recognised, for example, in the report on the MEPC Site (10/2230/OUT);

“The site does not play a significant role in the visual character of the green belt or its functional role in preventing coalescence between settlements... The proposals would, however, enhance the ability to retain a functionally usable green wedge between Abbots Langley and Leavesden to protect against coalescence. Nor would the grant of permission prejudice the ability to define defensible boundaries for the remaining green belt through the development plan process/Green Belt review” (para 7.2.16).

With regard to the Island Site, the land does not contribute to the purposes of including land within the green belt. The land is enclosed and surrounded by the highway network, giving it an urban character and preventing views through the Island Site. It does not perform the same role as the Backlot in maintaining the openness of the green belt, nor does it play a role in separating neighbouring built up areas or preventing their coalescence.

The other three identified purposes of including land within the green belt have no relevance to either the Studios or the Island site.

Para 83 of the NPPF provide that established green belt boundaries should only be altered where exceptional circumstances exist. Those exceptional circumstances have been recognised recently to exist by the council in the case of the Studios, in the Committee Report on the recently granted major planning permission for the Studios. There is no doubt that exceptional circumstances justify a revision to the green belt.
boundary, a point expressly accepted by the core strategy, which the Site Allocations DPD is required to follow.

The proposed boundaries will not have any adverse impact upon the integrity of the green belt nor its ability to fulfill its defined purposes. It is noted that the recreation land adjacent to Huntonbury Estate already benefits from protection as formally allocated public open space.
<table>
<thead>
<tr>
<th>NPPF para 80 objectives</th>
<th>Parcel 1 WBSL developed land to north-west</th>
<th>Parcel 2 Studio Tour car park</th>
<th>Parcel 3 Island site</th>
<th>Parcel 4 Public open space</th>
</tr>
</thead>
<tbody>
<tr>
<td>To check the unrestricted sprawl of large built-up areas</td>
<td>Not applicable. The site does not play a functional role in preventing urban sprawl. Other land owned by the Council (Leavesden Country Park, the Horsefield and Furtherfield) serves this purpose in separating Abbots Langley and Leavesden, in addition to the role played by the backlot. Parcel 1 does not contribute in any way to this separation.</td>
<td>Not applicable. The site does not play a functional role in preventing urban sprawl. Other land owned by the Council (Leavesden Country Park, the Horsefield and Furtherfield) serves this purpose in separating Abbots Langley and Leavesden, in addition to the role played by the backlot. Parcel 2 does not contribute in any way to this separation.</td>
<td>Not applicable. The site does not play a functional role in preventing urban sprawl. Other land owned by the Council (Leavesden Country Park, the Horsefield and Furtherfield) serves this purpose in separating Abbots Langley and Leavesden, in addition to the role played by the backlot. Parcel 3 does not contribute in any way to this separation.</td>
<td>A new urban boundary, defined by Aerodrome Way would ensure a long-term check to urban sprawl and a clearly defined Green Belt boundary. Parcel 4 should be designated protected open space under Policy SA5</td>
</tr>
<tr>
<td>To prevent neighbouring towns merging into one another</td>
<td>Not applicable. The site does not play a functional role in preventing coalescence between the settlements of Abbots Langley and Leavesden.. Other land owned by the Council (Leavesden Country Park, the Horsefield and Furtherfield) serves this purpose, in addition to the role played by the backlot.. Parcel 1 does not contribute in any way to this separation.</td>
<td>Not applicable. The site does not play a functional role in preventing coalescence between the settlements of Abbots Langley and Leavesden.. Other land owned by the Council (Leavesden Country Park, the Horsefield and Furtherfield) serves this purpose, in addition to the role played by the backlot.. Parcel 2 does not contribute in any way to this separation.</td>
<td>Not applicable. The site does not play a functional role in preventing coalescence between the settlements of Abbots Langley and Leavesden.. Other land owned by the Council (Leavesden Country Park, the Horsefield and Furtherfield) serves this purpose, in addition to the role played by the backlot.. Parcel 3 does not contribute in any way to this separation.</td>
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</tr>
<tr>
<td>To assist in safeguarding the countryside from encroachment</td>
<td>The site does not play a significant role in the visual character of the green belt. Parcel 1 is no longer open in character and contains significant built development</td>
<td>The site does not play a significant role in the visual character of the green belt. Parcel 2 is no longer open in character and contains significant built development</td>
<td>The site does not play a significant role in the visual character of the green belt. Not applicable, other land owned by the Council serves this purpose and the Studios</td>
<td>Parcel 4 can be designated under Policy SA5 as protected open space</td>
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(studio offices, production and support facilities), none of which contribute to meeting green belt objectives.

(Studio Tour car park and ancillary facilities to support the tour). The parcel does not contribute to meeting green belt objectives.

does not contribute in any way to this separation

To preserve the setting and special character of historic towns

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

| To preserve the setting and special character of historic towns | Not applicable | Not applicable | Not applicable | Not applicable |
| To assist in urban regeneration, by encouraging the recycling of derelict and other urban land | Not applicable | Not applicable | Not applicable | Not applicable |
Table 2: Meeting green belt review requirements (NPPF para 85)

<table>
<thead>
<tr>
<th>NPPF para 85 objectives: When defining boundaries, local planning authorities should:</th>
<th>Parcel 1</th>
<th>Parcel 2</th>
<th>Parcel 3</th>
<th>Parcel 4</th>
</tr>
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<tbody>
<tr>
<td>Ensure consistency with the Local Plan strategy for meeting identifies requirements for sustainable development</td>
<td>Removal of Parcel 1 from the green belt would allow consistency with CS policies PSP2 and CP11 and sustainable development objectives at WBSL – a nationally significant employment site – to be achieved</td>
<td>Removal of Parcel 2 from the green belt would allow consistency with CS policies PSP2 and CP11 and sustainable development objectives at WBSL – a nationally significant employment site – to be achieved</td>
<td>Removal of Parcel 3 from the green belt would allow consistency with CS policies PSP2 and CP11 and sustainable development objectives at WBSL – a nationally significant employment site – to be achieved</td>
<td>Removal of Parcel 4 will not conflict with Local Plan objectives and the allocation of Parcel 4 as open space under policy SA5 can ensure this land remains undeveloped.</td>
</tr>
<tr>
<td>Not include land which it is unnecessary to keep permanently open</td>
<td>Parcel 1 does not contribute to keeping land permanently open. Green belt objectives would remain intact if the boundary altered as shown on Plan A</td>
<td>Parcel 2 does not contribute to keeping land permanently open. Green belt objectives would remain intact if the boundary altered as shown on Plan A</td>
<td>Parcel 3 does not contribute to keeping land permanently open. Green belt objectives would remain intact if the boundary altered as shown on Plan A</td>
<td>Removal of Parcel 4 will not conflict with green belt objectives and allocation of this land as open space under policy SA5 can ensure this land remains undeveloped and permanently open.</td>
</tr>
<tr>
<td>Where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the green belt, in order to meet longer-term development needs stretching well beyond the plan period</td>
<td>Not relevant – Parcel 1 required as development land within the plan period</td>
<td>Not relevant – Parcel 2 required as development land within the plan period</td>
<td>Not relevant – Parcel 3 required as development land within the plan period</td>
<td>Not relevant – land should be allocated as dedicated open space under policy SA5</td>
</tr>
<tr>
<td>Satisfy themselves that green belt boundaries will not need to be altered at the end of the development plan period, and</td>
<td>Council proposal will require alteration during the plan period; boundaries proposed by WBSL will endure beyond the plan period,</td>
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</tr>
</tbody>
</table>
Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent

| Boundary proposed by the council does not meet this test and is not sound, unlike the readily recognisable and clear physical boundaries proposed by WBSL as shown on Plan A that will endure. Aerodrome Way, Studio Tour Drive and the ditch that marks the Studios north-western boundary will provide a robust boundary edge. |
| Boundary proposed by the council does not meet this test and is not sound, unlike the readily recognisable and clear physical boundaries proposed by WBSL as shown on Plan A that will endure. Aerodrome Way, Studio Tour Drive and the ditch that marks the Studios north-western boundary will provide a robust boundary edge. |
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