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**KINGS LANGLEY & DISTRICT RESIDENTS ASSOCIATION**

**email: residents@greenbeltmatters.com**

**Facebook.com/greenbeltmatters www.greenbeltmatters.com**

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**Guidance for commenting on Rectory Farm – Cala’s application for 135 new homes (Ref: 22/01836/MFA)**

***To view the application documents please click*** [***HERE***](https://planning.dacorum.gov.uk/publicaccess/applicationDetails.do?activeTab=documents&keyVal=RD7TT7FO00C00)***. The main summary is included in the Planning Statement document*** [***HERE***](https://planning.dacorum.gov.uk/publicaccess/files/043B036F824231A7201E0475804740CB/pdf/22_01836_MFA-PLANNING_STATEMENT-1310790.pdf)***.***

***For information on how to submit your comments refer to page 6 of this Guidance.***

The KL&DRA is strongly against the development of green field, Green Belt land in and around Kings Langley. Not many of us who are like-minded and wish to comment on the above application are planning experts. This guide has been put together to help residents make sure their voice counts when Dacorum Borough Council (DBC) decide whether or not to allow it. The greater the number of residents who send in comments, then the more DBC will take notice of the strength of feeling in the village.

Some residents may support the development, but it is important to realise that Kings Langley is not a NIMBY (Not In My Back Yard) village. The village has and continues to increase in size due to numerous brownfield sites becoming available. The KL&DRA support well thought out brownfield developments and agree that Kings Langley must take its share (we did not object to the Miller Homes development of 55 houses on the brownfield area of Rectory Farm). But to develop on green field, Green Belt land is totally unnacceptable when brownfield sites are available across Dacorum and indeed across the whole country. We need green fields for our well being and for growing food, which not so long ago was going on at Rectory Farm. Rather than NIMBY, we are CAMBY (Care About My Back Yard).

Following is some context on why it is essential to protect our Green Belt and following that, some guidance on how villagers can comment. Please use whatever ideas mean something to you and fits with how you feel. If you can put comments into your own words, rather than just cut and paste, that will be more effective. Please respond, even if you just use one idea, your comment will count.

***Context***

Why do we have Green Belt designated land? The Green Belt serves 5 purposes as defined in a Government planning guidance document called the National Planning Policy Framework (NPPF):

1. to check the unrestricted sprawl of large built-up areas:
2. to prevent neighbouring towns merging into one another;
3. to assist in safeguarding the countryside from encroachment;
4. to preserve the setting and special character of historic towns; and
5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Once established, Geen Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified.

Before concluding that exceptional circumstances exist, local authorities should demonstrate that all other reasonable options, such as brownfield sites, have been examined fully.

***Rectory Farm is a key Green Belt area in Kings Langley***

The KL&DRA have been fighting for Rectory Farm’s Green Belt for over 22 years. In the previous Local Plan, we were successful in getting the site removed from the Local Plan ensuring its Green Belt status remained intact. The NPPF applied then, as it does now and since the last Local Plan, Kings Langley has seen significant expansion on brownfield sites, eg Ovaltine. This makes Rectory Farm a vitally important Green Belt site.

***Ideas for comments on Cala’s proposed development:***

**Comments based on the NPPF:**

* Say you do not believe Cala has demonstrated exceptional circumstances for removing the site from the Green Belt, as required by the NPPF. Housing need alone is not an exceptional circumstance as this need can be met from numerous other brownfield sites in and around Kings Langley (to illustrate the number of sites where new homes are being / potentially will be developed in Kings Langley, see our latest KL&DRA newsletter , pages 2 & 3, [***HERE***](https://www.greenbeltmatters.com/_files/ugd/fc2ef2_a9941e34ac0549b598c078d31817b4b3.pdf) .
* Say that the site provides a clear open green field boundary to the northside of Kings Langley – a clearly defined limit to that side of the village, preventing urban sprawl.
* Say that the site prevents Kings Langley extending into Nash Mills and Apsley and so stops the village merging into another settlement.
* The countryside around Kings Langley is why many of us came to live here in the first place. It supports biodiversity and being undeveloped suppresses pollution and carbon emissions if it stays that way. It provides great amenity. Rectory Farm is a piece of the countryside that we cannot lose and could provide great amenity if the whole of the site was opened up as green field amenity space for the village. Instead, all Cala are offering is a small strip of land along the canal to the community, the whole site should be retained in the Green belt as an open space for residents to use as amenity space.
* Kings Langley is defined by the Green Belt around it. Kings Langley is an historic village in danger of expanding into a town. All of our Green belt sites assist in maintaining the shape and special character of the village. Rectory Farm covered with houses creates a sprawling extension to the village that is unjustified and unnecessary. The site has already taken 55 homes on the brownfield part and that is enough for this area.
* Building 135 new homes on this Green Belt site does nothing to assist urban regeneration. Brownfield sites in around the village are already doing this to an extent that Kings Langley’s infrastructure cannot take anymore.
* Cala’s Executive Summary in their Planning Statement, paragraph 1.6, states “The proposed development delivers substantial planning benefits, which contribute to demonstrating Very Special Circumstances exist for the removal of the Site from the Green Belt.”:
  + *“Creation of 135 high quality residential homes, including family-sized dwellings;”*

Quantum, Quality and Type are not characteristics which are considerations for determining ‘Very Special Circumstances. Furthermore, Quality is subjective and there is no base line definition against which it can be compared or measured. High Quality usually defines price point and not much else and most residential developments carry a tag, e.g. Superior. Marketing jargon does not justify reasons for exceptional circumstance.

* + *“Provision of 54 affordable homes (40% of the total residential provision) which exceeds DBC’s adopted policy target of 35% and includes First Homes;”*

Affordable Homes are part of DBC’s Planning Policy requirement. It has no association with Green Belt. To exceed DBC’s requirement for this development by just 7 dwellings out of 135 does not constitute exceptional consideration.

* + *“Provision of 461 sq.m. of community facilities to be managed and delivered by a registered local charity;”*

Kings Langley already has many Community facilities – the Community Centre, three church halls, Scout Hut and two senior school Halls (KL Senior School and the Steiner School) – all more centrally located to the heart of Kings Langley and include substantial car parking on-site or adjacent. This proposal does not meet an unfulfilled demand in Kings Langley and, being located at some distance from the village centre, is unlikely to be regarded as an alternative option. By no yardstick does the proposed Community Centre rate as a ‘Very Special Circumstance’.

* + *“Creation of a 2.56ha canalside park, comprising 36% of the site area, to serve the development and the wider community;”*

The canalside park is self-contained. It does not connect with existing leisure routes and with access only possible through the new residential area it is highly questionable whether the wider community will regard it as a benefit, or use it. There are ample existing leisure routes in and around Kings Langley including along the canal towpath (east side). The canalside park does not satisfy any ‘Very Special Circumstance’ criteria.

* + *“Promotion of greener modes of travel through enhanced permeability and new pedestrian and cycle links across the Site;”*

Where is the evidence for suggesting that permeability (whether ‘enhanced’ (what is that) or not) or pedestrian and cycle links across the site will promote greener modes of travel? Whilst fewer cars might be desirable, local evidence such as for the Nash Mills redevelopment (e.g. parking on Red Lion Lane) strongly confirms that personal requirement for car usage far outweighs planning aspiration. It is notable that the number of car spaces proposed for this development is substantially below that required by DBC’s Parking Standard. Over-parking should therefore be expected (again as per Red Lion Lane) which of itself will act against permeability, ease of cycling, and access to the canalside park. By no means does this item constitute a benefit.

* + *“Incorporation of a high quality design, with a landscape-led approach, that responds to the context of the surrounding local area;”*

Again very subjective – high quality design, landscape-led approach, responds to the context! Certainly not reasons for consideration as Very Special Circumstances.

* + *“Inclusion of a high quality planting scheme to enhance the biodiversity and habitat value of the Site, achieving a net gain in biodiversity over 10% across the Site;”*

This again is not an exceptional circumstance for removing the site from the Green Belt. The stated 10% gain in biodiversity must be set against the loss of almost 18 acres of green fields that could support massively more biodiversity if not developed and properly managed.

* + *“Delivers tangible environmental gains including new tree planting, SuDS, and carbon reduction measures.”*

Real environmental gains would be achieved by returning the whole site to a natural and manged green space, not by planting a few trees on a small percentage of the overall site. The stated benefit is not an exceptional circumstance.

**Other ideas for comments:**

* Cala’s application does nothing to provide much needed vital infrastructure to support the additional homes. The development will pile on more pressure to the already over-stretched schools and health facilities in the village. Taking an average household size of 2.36, that’s 318 additional residents who will need healthcare and be added to doctor’s lists. Say, for example, 100 of those are school age children. Kings Langley’s schools are already over-subscribed. Cala’s application does not provide any additional essential infrastructure.
* We not need another Community Centre or café – we are already well served with existing facilities.
* Kings Langley has already taken its fair share of new development in terms of its allocation of house numbers in the draft local plan. Building on Green Belt at Rectory Farm is unnecessary and once the green fields have gone they cannot be replaced.
* Allowing development on Rectory farm could set a precedent for other developers to come forward with other Green Belt sites around the village, with an expectation that those will be developed as well.
* Cala’s offer of a strip of land for community use alongside the canal is pitiful. It is the area most likely to flood and therefore is not suitable to build on (as stated in their Planning Statement), so they offer it as something useful to the village. The whole of the green field site should be retained in the Green Belt and made available to the community.
* Cala state that the land is poor quality Green Belt. The NPPF does not grade the quality of Green Belt. It is Green Belt or not. If it is, then it serves the purposes of being Green Belt. When Cala infer the site is derelict, that is only because prevoius owners have not looked after it. Not so long ago, this land was used for growing community food which was sold at Kings Langley’s monthly local produce market and also shared out within the village. Many residents remember when Rectory Farm was a “pick your own” soft fruit farm.
* Our new Neighbourhood Plan (currently undergoing review) has a policy to encourage all agricultural lane to be brought back into use. This would be a far more appropriate and beneficial use of the site.
* Developing on green field, green belt does not contribute to climate change initiatives or carbon neutrality. Removing green space from our local environment does the opposite.
* Cala correctly state the government target for Dacorum is 16,596 homes across the Local Plan period which equates to 922 homes per annum. However, DBC are challenging this target with the Government and the KL&DRA is aware that these numbers are woefully out of date as they were calculated pre-Brexit and pre-Pandemic. Real local housing need is significantly lower. DBC know they can push back on these Government targets which why they pulled the draft Local Plan and are reconsidering it. Accordingly, there is no justification for Cala to build 135 new homes on Green Belt land in our village.
* DBC recently commissioned an ecological report which revealed more action is required to protect Sites of Special Scientific Interest (SSSI) which form part of the Chilterns Beechwoods Special Area of Conservation. As a result The Council now has to develop a mitigation strategy and in the interim will postpone issuing decisions on planning applications. Cala’s development facilitates the addition of over 300 new residents into the area which will increase the possible footfall in these protected areas.
* Cala say the impact of the extra vehicles on the site is minimal. They are providing 330 parking spaces which is not enough according to DBC policies. How can additional 330+ vehicles turning out on to the A4251 or onto Rectory Lane not cause signicant addional load on the one main thoroughfare through the village?
* The KL&DRA believe the height of the 4 storey blocks of flats planned for the site are too high and very much out of keeping with the rest of the village.
* Cala’s planning statement states “the affordable housing provision seeks to address the need for First Homes, aimed at accomodating younger residents of Kings Langley”. It does not state “will address” so there is no guarantee that younger residents of Kings Langley will benefit.

NB: You can also read other residents’ comments on the DBC Planning Portal, using the application reference (see below) and use the information contained within them if those comments strike a chord with you.

***Submitting your comments:***

You can submit your comments via the DBC Planning Portal (application ref. 22/01836/MFA) or by email.

***Via the Planning Portal:***

To make comments via the planning portal you need to register by following this link:

[Register here](https://planning.dacorum.gov.uk/publicaccess/registrationWizard.do?action=start&keyVal=RD7TT7FO00C00&activeTab=makeComment&caseType=Application)

Once registered, Login and make a comment by following this link: [Make a comment](https://planning.dacorum.gov.uk/publicaccess/applicationDetails.do?activeTab=makeComment&keyVal=RD7TT7FO00C00).

***Via email:***

Send your comments by email to the following address: [planning@dacorum.gov.uk](mailto:planning@dacorum.gov.uk)

* Make your email for the attention of Mr Robert Freeman, Planning Officer
* Include the application reference: 22/01836/MFA
* Set out your comments
* Include your name and address

**The Planning Officer has informed the KL&DRA that he will accept comments until the end of July 2022.**

**End of document**