Dacorum Local Plan (2020-2038) Emerging Strategy for Growth – Consultation.

Kings Langley Parish Council response

Thank you for the opportunity to comment upon Dacorum's draft Local Plan.

Kings Langley Parish Council start from a position that the current national housing targets are too high and there needs to be a more even distribution with less emphasis on London and the Home Counties. The current housing target (subsequently increased to 1,023 per annum) generated by standard housing methodologies produces a figure well in excess of the Office of National Statistics projection of housing need based on their latest (2018) figures.

If the latest figures were accepted it would result in a reduction in the annual housing target and help to reduce the 922 per annum figure in Dacorum's draft Local Plan. As you will know, the previous Local Plan housing target was set at 430; the current draft Local Plan target will result in a level of growth that can only be achieved with significant development of the Green Belt.

As Dacorum will also be aware, to achieve such a level of house building will be more than has been achieved within the Borough before. To expect to maintain this level of development annually until 2038 is clearly unrealistic.

Nevertheless, failure to meet the Government's targets will mean Dacorum is penalised under the Housing Delivery Test for housebuilders' failures to build enough homes, by being forced to release more Green Belt land for development. The more developers miss the Council's housing target, the more land Dacorum will be forced to release for development. A lower, more realistic target is far more likely to be achieved and consequently negate any demand to release further Green Belt land in the Borough. However, developers should be equally concerned that forcing the Borough to release more land for development will have a long-term, negative impact on their relations with the Council, which all parties should be keen to avoid.

The Borough's current reliance on Green Belt development to achieve its targets also runs counter to the Government's response to the local housing need proposals set out on 16th December 2020 in which it stated "... that in some places the numbers produced by the standard method pose a risk to protected landscapes and Green Belt. We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places". The Campaign for Rural England (CPRE) have also consistently pointed out that housing developments on Green Belt are invariably too expensive for those looking for a first home and do nothing to address the needs of younger people and families trying to put a roof over their heads.

As a result, Green Belt development will do nothing to address the Borough's housing needs. It will also undermine one of the aims of the latest version of the Kings Langley

draft Neighbourhood Plan (January 2021), namely "Providing homes in the parish that are financially accessible to younger people, especially young families and those stepping onto the property ladder for the first time".

If unrealistically high local housing targets are intended to increase the supply of housing for young people, the question needs to be asked as to how inflated house prices on Green Belt sites will help achieve this? The answer is clearly it will not. Similarly, what chance have Dacorum of meeting the commitment made at their Council meeting in January 2021 "to build on the positive work of previous years and continue work directly to develop homes for social rent and to seek further opportunities with partner registered providers to accelerate the delivery of new social rent homes". Developers will clearly be unwilling to increase the proportion of social rent housing on land where they have been obliged to pay a premium.

Regarding infrastructure, in Kings Langley the schools and health services are currently over-subscribed, local entertainment is limited to pubs and restaurants and the roads are over-loaded. Peak time traffic levels bring the High Street to a standstill in the morning and late afternoon, with Heavy Goods Vehicles exacerbating this issue, particularly when any of the surrounding roads or A41 by-pass are busy or closed for accidents or repairs. In addition, public transport services are very limited during the day, with a daily bus service only between Aylesbury and Watford buses and not running past 7pm for 6 days of the week nor beyond 6pm for the hourly service on Sundays. This is not an attractive proposition for young people or young families outside the village who would prefer to live in towns where they would be better served with a higher level of education and health services, public transport and other amenities.

Returning to the needs of local people, as you will be aware, in 2017 the Parish Council held a Village Poll asking the question "Do you believe the Green Belt in and around the parish should be developed, as is being considered in the Dacorum Local Plan 2017 consultation?": 99% of those who voted, cast their vote against ANY Green Belt development.

The Parish Plan survey in 2019 found 95% of respondents wanted Kings Langley to remain a village with 96% valuing the sense of community with accessibility to surrounding countryside being a key benefit to everyday living. The proximity of open space was regarded as a key defining characteristic by 98% of local people.

The latest version of the draft Neighbourhood Plan has an overarching vision "To preserve and enhance what parishioners most value about Kings Langley in line with the priorities suggested by the 2019 Parish Plan Survey - the village status of Kings Langley, environmental action, greenbelt, proximity to open countryside, canal, woods and common, its thriving high street and strong sense of community."

In addition, the Parish Council would also wish to make the point that Kings Langley 'straddles' the Grand Union Canal, even though the parish boundary is the canal itself.

(The area of Kings Langley to the east of the canal falls within Three Rivers District Council.)

As a community and in its employment, social and services infrastructure, the area of land that lies between the canal and the railway line to the east, from Gallows Hill bridge by Kings Langley Railway Station in the south to the Nash Mills bridge in the north, is an integral part of Kings Langley. The two areas are interdependent: retail and restaurants, doctors and dentists, schools, churches, community facilities, employment, commercial and public transport services. The majority of these are within the Kings Langley parish boundaries with the result that those living to the east of the canal tend to 'cross the canal' to access them.

However, the entire Employment Area in this part of Three Rivers, some 30 hectares, is classified as Brownfield land for housing development. Already lost is employment land at Pinnacle House, West Herts College, Shannon House, Alpine Press and two other sites in Primrose Hill amounting to over 250 units which have either recently been approved for housing or are currently going through the planning process. This is putting even more of a strain on roads, shops, schools, health services and related infrastructure in the parish of Kings Langley.

It should also be noted, Three Rivers initial draft Local Plan consultation document also included 2 enormous developments of hundreds of houses on Green Belt land close to Station Road on an area described in their consultation as 'Kings Langley Estate'.

Finally, the Dacorum draft Local Plan envisages nearly 300 dwellings in the village over the life of the plan, but it is likely over 80% will be built in the first few years putting an immediate strain on the village without any additional supporting infrastructure. This will inevitably compromise two other aims in the draft Neighbourhood Plan, namely "Safeguarding the rural, tranquil character, biodiversity and green spaces of the parish" and "Protecting the individual identity of Kings Langley, ensuring that encroachment on neighbouring settlements is minimised by maintaining the current inter-settlement gaps."

In summary, Kings Langley Parish Council would ask that Dacorum Borough Council reconsider its approach and respect the overwhelming views of our residents.