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KINGS LANGLEY PARISH COUNCIL

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RESPONSE FROM KINGS LANGLEY PARISH COUNCIL

Thank you for the opportunity to respond to this consultation.

There are three main points:

The changes to housing targets, to make them 'advisory', are very welcome. However, the Government is still using out-of-date projections (2014); using the most up-to-date projections makes more sense if housing demand is not to be over-stated.

There needs to be a review of the Standard Method, which does not make housing affordable and simply supports developers and others to build homes where they want to rather than 'brownfield first'. They also need to be where they are needed at a price people can genuinely afford. The term 'affordable' in this context is certainly not the case in most parts of the country.

Thirdly, protecting the Green Belt should mean that and the very special circumstances for any development should be limited solely to those strictly defined in the National Planning Policy Framework.

Turning to specific comments:

- strongly support the changes proposed to paragraph 11 and the five-year housing supply. It is essential that councils can plan, instead of being subject to speculative development and planning by appeal.
- Welcome the greater protection given to Neighbourhood Plans in paragraph 14 in relation to the presumptions in favour of development
- the development of local plans should also include a full climate change assessment, including a climate change impact assessment (paragraph 16).
- 'justified' at paragraph 35 must be reinstated as a soundness test in plan-making – a local authority must be able to demonstrate why it has chosen a strategy and to support it with appropriate evidence. It should use the very latest demographic / population data.
- the overall aim in delivering a sufficient supply of homes (Chapter 5) should be to meet as much housing need as possible with an appropriate mix of housing types to meet the needs of communities.

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- there must be a 'brownfield first' policy. As per paragraph 61 brownfield and other under-utilised urban sites should be prioritised, and on these sites density should be optimised to promote the most efficient use of land, something which can be informed by local plans and design codes. This is to ensure that homes are built in the right places, make the most of existing infrastructure, and allow people to live near the services they rely on, making travel patterns more sustainable.
- paragraph 63 (in terms of establishing need) should explicitly include social housing. This is often an important stepping stone to home ownership. This should then be a golden thread through subsequent paragraphs in this chapter.
- paragraph 70 on small development sites could be more positive since they are arguably more sustainable and make less demand on other services, including local infrastructure. Consideration should be given to promoting such sites explicitly within the new NPPF, notably paragraph 77 where a local authority is not meeting the Housing Delivery Test. The need to regularly review progress on developments and the housing supply, whilst welcome, will potentially prove problematic unless some additional guidance is provided on how this is to be achieved.
- paragraph 106 should provide the opportunity to structure the involvement of highway authorities in any large developments at the pre-planning stage.
- As per paragraph 177 there must be protection for the intrinsic character and beauty of the countryside, and the wider benefits, including the economic and other benefits of agricultural land, and of trees and woodland. In particular, the protection of agricultural land to ensure 'food security' in this country for food production must be prioritised and protected in the NPPF explicitly. This would be both local and national interests given preference to the wishes of landowners and / or developers.

On behalf of Kings Langley Parish Council

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