

## Updated objection to Rectory Farm from KL&DRA, Submitted to DBC Planning on Tuesday 18/4/2023

### **Re: Planning application 22/01836/MFA – Comprehensive development comprising 135 residential units at Rectory Farm, Kings Langley**

The KINGS LANGLEY & DISTRICT RESIDENTS ASSOCIATION (KL&DRA) wish to comment on the additional 52 documents provided by, or on behalf of, the applicant. The Association is concerned and disappointed that the applicant has not taken the consideration to provide even a basic summary of what changes to their application these documents describe. The applicant also fails to indicate why these new documents have been provided. If they are in response to requested changes by Dacorum Planning or statutory or other consultees, this is also not apparent.

Notwithstanding this lack of clarity, the KL&DRA conclude that all of our previous objections have not been mitigated and therefore still stand as objections against the granting of permission of this application.

The KL&DRA further objects to the application for the following reasons:

The application breaches the Kings Langley Neighbourhood Plan (KLNP):

The Rectory Farm development application made by Cala Homes is the first major development to come under the scrutiny of the KLNP, which has clearly set out its Vision and Objectives, as well as its Policies and Design Codes. The KL&DRA contend the application breaches the Neighbourhood Plan as detailed below:

The KLNP Vision is - To preserve and enhance what villagers most value about Kings Langley in line with the priorities suggested by the 2019 Parish Plan Survey - its village status, environmental action, Greenbelt, proximity to open countryside, canal, woods and common, its thriving High Street and strong sense of community. - We believe the development Cala Homes is proposing breaches this Vision at every level.

Objective One -

To direct new development to within sites allocated by the Dacorum Local Plan, and to protect, as far as possible, the Green Belt, valued green space in and around Kings Langley and local character and heritage.

Development should contribute towards a proven local need. - The proven local need as shown from the Parish Plan survey data was for social housing and starter homes, and the Cala Homes development fails to meet this need, and is attempting to force through development that will bring added pressure to local education and health services.

Objective Two -

To require any new development, an assurance of the credibility of the developer and an assurance of the environmental sustainability of any proposed development with plans ideally approaching a 'zero carbon goal' through building materials, alternative energy sources, energy saving design, encouraging walking and cycling. - The Cala Homes planning application clearly fails to meet this objective. NB: The applicant has made no changes made to the Energy Statement – 1310784, which includes statements that are untrue:

- i. CALA are not proposing to build homes to "passivhaus" standards, so new homes could not possibly "reduce" carbon emissions and certainly not below that of the Green Belt land that is being built on.

- ii. The Energy Statement says there are no proposals for a local District Heating Network. This is not true, since Grand Union Community Energy (GUCE) commissioned Bioregional consultants to study a network which could heat a majority of homes in Kings Langley. Their report was submitted in March and can be found at:

<https://www.heatingkingslangley.guce.org.uk/project-updates>

The KLNP clearly lays out its Guiding Principle for new housing development:

The Guiding Principle - It is really important that development taking place in Kings Langley contributes positively to the benefit of the community. We cannot halt strategic housing development, but we can have a say in the sorts of housing they deliver, the design of that housing and what facilities it might provide to the benefit of the local community. The Parish Plan survey made it clear that 96% of residents were against development of Green Belt land.

These are the KLNP Policies that we believe challenge the suitability of the Cala Homes planning application:

Policy KL1 - Location of Development

Section B. - Development outside of the settlement boundary must not individually or cumulatively result in physical and/or visual coalescence and loss of separate identity of Kings Langley with neighbouring settlements including Hemel Hempstead and Watford. - The loss of this important parcel of Green Belt land will eventually lead to the inevitable coalescence with Apsley. There is history of a similar application being turned down on appeal (as part of the last DBC Local Plan) for the very same reasons, and the circumstances are no different today.

Section C. - In determining development proposals, substantial weight will be given to the value of using suitable Brown field land within the settlement boundary of Kings Langley. - The opportunity to develop Apsley One, and the eventual re-development of the BT Exchange in Kings Langley, challenges the rationale of needing to build on Green Belt land in the heart of Kings Langley.

Policy KL2. - Meeting local housing needs.

Section A. - Proposals which seek to deliver a higher proportion of one and two bedroom homes will be supported. - This application fails to recognise this policy statement.

Policy KL4. - Design of Development

Section 6.16 - Higher density, taller housing directed towards the bottom of the valley.

Development should take advantage of and complement existing buildings, landscape and topography and should preserve views and sight lines to and from current built up areas. - The recent phase one development (by Miller Homes) on the brown field part of Rectory Farm more closely complies with the KLNP, and sets the parameters for any further development of the site.

Section 6.17 - Whilst there are examples of developments where a large dwelling has been developed into apartments exceeding two storeys, this is usually where the previous building has been a heritage asset of height. New buildings should not exceed two storeys plus pitched roof where they would be out of keeping with the prevailing height of buildings in the Character Area. - This surely makes the development proposals challengeable on two counts:

1. There is a clear statement that buildings should not exceed 2 storeys plus pitched roof. This has been included in the Neighbourhood Plan as an over-arching statement to avoid large scale development along the canal, similar to the Sappi site and the subsequent issues caused along Red Lion Lane.

2. The Miller Homes development has stayed within this provision and therefore clearly sets a precedent for second phase developments to the same site, regardless that the application is from a separate company. The Character Area is now surely an extension of Inner Zone Two.

Policy KL3 - Character of Development

Section B. 1 - Make a positive contribution to the character of the area when viewed from the main highway approaches into the Parish (A4251 from the north and south). - We believe that a development that proposes to build blocks of flats of 3/4 storeys brings a negative contribution to the character of the area and therefore breaches this section.

Sect B. 4 - Not to have a significantly detrimental impact on the local views as set out in Policy KL15. View 2 sets out to protect the canal views from the Inner Zone. - We contend that this Application significantly impacts these views and therefore breaches the Neighbourhood Plan in this respect.

The amended drawing SECTION\_BBB-1387495 appears to show the blocks of flats A & B of at least three storeys high, with Block B even higher. These plans are not do not appear consistent with the KLNP Appendix B - Design Guidance and Code, which states in Section HO.01:

1. The scale and massing of new buildings should be consistent with the form and massing of neighbouring properties. - For this application, that is the Miller Homes development.
2. New developments should seek to respond to the surrounding context by using surrounding contexts by using similar configurations with a modern interpretation. Buildings and developments that do not respect the existing townscape should be avoided.
3. The height of new buildings should respond to the surrounding context and should not be overbearing or dominant in the existing street scene.
4. Development within Kings Langley should be at a scale and design to reinforce the locally distinctive character of each character area.

It is the Kings Langley & District Residents Association's position that this new application clearly undermines numerous important principles built into the newly approved Kings Langley Neighbourhood Plan. This application is seeking approval by offering community benefits, but at a cost of these breaches which is wholly unacceptable to the KL&DRA.