



Robert Freeman
Planning & Development
Dacorum Borough Council
The Forum, Marlowes
Hemel Hempstead
Herts. HP1 1DN

Our Ref:

Your Ref:

20th July 2022 (by email)

Dear Robert Freeman,

Applications no. 22/01836/MFA

Rectory Farm, Kings Langley

Comprehensive development comprising 135 residential units, new community buildings (including cafe and farm shop, cycle hub, repair shed, meeting & office space) creation of new public open space and play space, provision of new vehicular and pedestrian access from Hempstead Road, provision of cycle and car parking and associated works

I write with regard to the above application, to which CPRE Hertfordshire objects for the following reasons.

1. The site lies within the London Metropolitan Green Belt as defined in the adopted Dacorum Borough Core Strategy, according to criteria in the National Planning Policy Framework (NPPF). Development in the Green Belt is inappropriate unless very special circumstances apply and it is entirely inappropriate to suggest that an allocation in an emerging Local Plan is justification for the proposal in the present circumstances.
2. It is noted that Dacorum Borough Council has decided to defer further progress on its emerging Local Plan pending further preparatory work. This is presumably due in large part to the huge public opposition to the Regulation 18 consultation on the proposals being made on designated protected land in the Borough.
3. Public responses to the Regulation 18 consultation overwhelmingly rejected proposals for development on the Green Belt throughout the Borough and local community concerns have been reflected in recent Ministerial statements re-emphasising the significance of designated protected land. Recent statements by former and present Ministers of Housing in response to queries by Hertfordshire MPs; Daisy Cooper MP (from Minister of Housing Chris Pincher) and Jane Marson MP and Sir Oliver Heald MP (from Minister of Housing Stuart Andrew), and others including CPRE Hertfordshire, have reiterated the government's intention to resist development on Green Belt.



4. Further, the recently published Levelling Up and Regeneration Bill Policy Paper: Further information” re-emphasises the Government’s support for protection of the Green Belt: “the increased weight given to plans and national policy by the Bill will give more assurances that areas of environmental importance – such as National Parks, Areas of Outstanding Natural Beauty...- will be respected in decision on planning applications and appeals. The same is true of Green Belt, which will continue to be safeguarded.” (LURB Policy paper: May 2022)
5. These statements have policy weight and highlight the inconsistencies which have arisen recently in council and planning inspectors’ decisions on applications and appeals on designated protected land throughout the County and further field. It is inappropriate for the Applicant to suggest that this application should now be determined when the reasons for the deferral of the Local Plan are directly relevant to the consideration of this proposal and as a responsible local planning authority Dacorum Borough Council would rightly wish its Local Plan to reflect local community concerns and aspirations, as required by the National Planning Policy Framework.
6. The Applicant’s Planning Statement deals at some length with what it calls “Green Belt Matters” (Section 7) and “Planning Assessment” (Section 8) which purport to demonstrate that very special circumstances are demonstrated with regard to the proposed site by virtue of overall housing need in Dacorum and lack of housing land supply overriding policy constraints relating to designated protected land. Very special circumstances should relate to the local conditions affecting the site and not be determined on the basis of criteria which could relate to any site in the Borough.
7. This is to misrepresent fundamentally key elements of the local planning system which are as much to articulate local community concerns as to promote development which is inappropriate in this location by virtue of its planning status. The proposed development clearly constitutes encroachment, impacting on the openness of the highly valued green open space adjacent to and between built-up areas which should be maintained.
8. A similar argument relates to the provision of affordable housing. Recent research by CPRE Hertfordshire indicates the complete inability of speculative market housing to address in any way the demand for housing by average or below average income households in both Dacorum and Hertfordshire as a whole. The proportion of affordable housing proposed is regarded by the Applicants as supporting the case for very special circumstances and again this is misleading.
9. CPRE Hertfordshire continues to challenge the scale of development proposed for the Green Belt, based as it is on out-of-date information relating to future housing need, as



we noted in our response to the Regulation 18 consultation. We would also anticipate that the recent Natural England instruction to suspend the issuing of planning decisions including residential development within a radius of the Chilterns Beechwoods SAC will affect this proposal.

10. It would be highly inappropriate for the Council to determine this application in advance of this new legislation which is seeking to respond to the justifiable concerns of the Government and local communities. We urge the Council to refuse this application on the basis of it being inappropriate development in the Green Belt.

Yours sincerely,

Chris Berry
Planning Manager