



Dacorum Borough Council

Local Planning Framework

DACORUM CORE STRATEGY EXAMINATION IN PUBLIC

Statement by Dacorum Borough Council

Issue 13: Kings Langley

September 2012

Purpose of this statement

The purpose of this statement is to summarise the Council's position regarding the following issues raised by the Inspector in advance of their discussion at the public hearing sessions.

To avoid repetition this statement includes cross references to appropriate technical work and includes relevant extracts as appendices.

Matters raised by Inspector

- 13.1 Is the vision for growth and change in this area appropriate and justified, including in relation to national guidance and local needs, and in terms of economic, social and environmental impact? Should there be a specific policy for the village as a whole in order to ensure that Council's vision will be delivered?
- 13.2 Is the Council's approach to education provision satisfactory and in particular is it clear what policies apply to Kings Langley Secondary School?
- 13.3 Have the consequences of infill development on local infrastructure (including highways, car parking, schools and health services) been satisfactorily addressed?
- 13.4 Can it be demonstrated that the Council has and will continue to co-operate with Three Rivers District Council with regards to development at Kings Langley?

Dacorum Borough Council's Response

- 13.1 Is the vision for growth and change in this area appropriate and justified, including in relation to national guidance and local needs, and in terms of economic, social and environmental impact? Should there be a specific policy for the village as a whole in order to ensure that Council's vision will be delivered?
- 13.1.1 In order to ensure preparation of a distinctive planning framework that reflects the needs and priorities of different communities, the Council has prepared an overarching Core Strategy with spatially distinctive strategies for each place within the district. This includes Kings Langley.
- National guidance
- 13.1.2 Achieving sustainable development is the Government's stated purpose for the planning system (paragraph 6 NPPF): it is elaborated in sections 1-13 of NPPF (Examination Document REG15).
- 13.1.3 There are 3 aspects to sustainable development – i.e. an economic role, a social role and an environmental role. These roles are interlinked and should not be taken in isolation (ref paragraphs 7 and 8, NPPF). Economic, social and environmental gains should be sought jointly (also ref paragraph 8, NPPF).
- 13.1.4 Paragraph 9 (NPPF) summarises what pursuing sustainable development involves: i.e.
- “...seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including (but not limited to):
- making it easier for jobs to be created in cities, towns and villages;
 - moving from a net loss of bio-diversity to achieving net gains for nature;
 - replacing poor design with better design;

- improving the conditions in which people live, work, travel and take leisure; and
- widening the choice of high quality homes.

Plans (and decisions) need to:

“.... take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas.” (Paragraph 10 NPPF). Furthermore, “Local plans are the key to delivering sustainable development that reflects the visions and aspirations of local communities.” (paragraph 150 NPPF)

13.1.5 The Council concludes that:

- a) the purpose of the Core Strategy and place strategies is to ensure that new development is sustainable;
- b) the Core Strategy should guide development to sustainable locations;
- c) development should support the achievement of the objectives and factors listed above;
- d) the appropriate balance between these factors may vary from place to place, due to their particular characteristics and their current and intended role within the Borough; and
- e) due consideration should be given to local community aspirations.

13.1.6 These principles underpin and are articulated in the Core Strategy. The Council has looked at the role of each place within this context and outlined what it considers to be the most appropriate strategy.

13.1.7 The settlement hierarchy for the borough and descriptions in Table 1 is based on the function and character of each place, and potential scale of change which each settlement (and the countryside) can reasonably absorb without undue detriment (see question 2.1 in Issue Paper 2: The Distribution of Development (Settlement Hierarchy) and the Green Belt).

13.1.8 Table 1 identifies Kings Langley as a large village. Large villages are ‘Areas of Limited Opportunity.’ It has an important role in meeting local housing needs, jobs and services, both for residents and adjoining rural communities. The general approach is to support development that enables the population to remain stable, unless a small element of growth is required to meet community needs. The broad approach to development set out within the Dacorum Borough Local Plan 1991-2011 (Evidence Document OT1) remains appropriate.

Local Considerations

13.1.10 The Borough’s needs and those of places within it have been considered through the creation of a substantial evidence base. This comprises technical studies, the results of public consultation and testing through the sustainability appraisal process: among other things they address the matters listed in paragraph 9 NPPF (see above).

Technical studies

13.1.11 Technical studies form an important part of the Council's evidence base. They look at the Borough both as a whole, and specific places within it. For all technical work carried out until July 2009 (Guide to the Evidence Base: Examination Document OT4), the conclusions were broken down into key place-based recommendations to assist the formulation of the individual Place Strategies.

13.1.12 The approach to homes and jobs within Kings Langley has been informed by:

- Housing assessments (e.g. Examination Documents HG9, HG14 and HG16)
- Employment space studies (e.g. Examination Documents ED1, ED8 and ED12)
- Retail studies (e.g. Examination Documents ED2 and ED6).

13.1.13 For Kings Langley, key recommendations are as follows:

Employment – The majority of the village's employment space is within the eastern part of the villages which lies within the Three Rivers administrative area. Whilst recognising that some of this land is likely to be lost to housing, it is recommended that the majority is retained in employment use.

Retail – The latest retail assessment does not contain any recommendations for local centres such as Kings Langley. The village has a vibrant busy High Street which provides for most of the residents day to day needs. It is appropriate that the current local shopping and service role of the village should be maintained. Developments that promote the vitality and vibrancy of the local centre should be encouraged and a minimum level of shop uses safeguarded.

Housing – The Core Strategy seeks to provide around 110 new homes between 2006 and 2031. The sensitive location and compact nature of the Kings Langley, together with the housing development planned in the Three Rivers part of the village, limits both opportunities and need for additional housing within Dacorum. New housing will be expected to provide an appropriate mix of housing types and including affordable housing. Options for the outward growth of the village were considered through Assessment of Potential Local Allocations and Strategic Sites (Examination Document HG15):

- Rectory Farm to the north;
- Wayside and Broadfield Farms to the south west;
- land north east of the A41 bypass; and
- land east of Watford Road.

This assessment concluded that whilst the first two locations were considered to be suitable for development, it was recommended that neither is taken forward at the present time. This is due to advice from Hertfordshire County Council regarding the lack of capacity at Kings Langley primary school (see below) and because the future housing needs of the village are expected to be largely met through new development planned in the Three Rivers part of the village. The Wayside and Broadfield Farm option would also result in the loss of active farmland. Site options have been considered through consultation on the Site Allocations Development Plan Document (DPD) (Examination Documents SA1

and SA5).

Policy CS19: Affordable Housing sets a lower threshold for on-site delivery of affordable homes than in Hemel Hempstead, to reflect local conditions (see response to Issue 7.2).

Environmental – Key documents include the Urban Nature Conservation Study (Examination Document EN3), the Urban Design Assessment (incorporating updates) (Examination Document BP5), the Open Space Study (Examination Document EN6), Green Space Strategy and Green Infrastructure work (Examination Document EN14). Advice has also been received from experts, including English Heritage, the Council's ecological adviser from the Hertfordshire Biological Records Centre and the County Archaeologist. This advice has helped identify the urban structure of the village articulated on the Kings Langley Vision Diagram (Core Strategy Figure 25) and reflected in the Place Strategy. This structure includes urban and strategic wildlife corridors, open land, green gateways and urban design zones. The Grand Union Canal is identified as an important strategic wildlife corridor that runs through the village. Kings Langley Common is an important area of open land.

Infrastructure – Through technical work (especially the Infrastructure Delivery Plan Update – Examination Document ID5) and consultation, relevant thresholds for new infrastructure and the capacity of existing infrastructure, including schools (especially primary schools), road network, leisure and community uses and utilities infrastructure have been considered. Consideration has also been given as to whether there should be any 'jumps' in thresholds e.g. what infrastructure is needed to accommodate different scales of development. In particular, primary school planning has been a useful check on the scale of new development. No 'showstoppers' have been identified in relation to the level of growth planned for the village. The level of development proposed for the village in the Core Strategy is accepted by the County Council in terms of service issues. The Infrastructure Delivery Plan identifies a feasibility study for a new primary school in the Bedmond / Abbot's Langley / Leavesden area. The threshold for this school would relate directly to the level of local housing proposed in the area. Dacorum Borough Council are working closely with Three Rivers District Council and Hertfordshire County Council in relation to this issue. The Council and Three Rivers Council will be guided by HCC on primary provision, the current conclusion is that an additional school in the south of Hemel Hempstead would be sufficient to meet all relevant needs. See response to question 13.2 below for further consideration of infrastructure issues.

13.1.14 The recommendations of all this technical work has been taken into account when developing the Kings Langley Place Strategy – both in the formulation of the vision, the setting of local objectives and the approach to growth and change

Consultation

13.1.15 Consultation has been carried out with residents and stakeholders. A full summary of the consultation processes, the results received and how this consultation has resulted in changes to the Core Strategy (up to the stage of Pre-

Submission) is set out in the Report of Consultation (Examination Document SUB6). Key elements have been:

(a) Place Workshops (see Volume 3 of the Report of Consultation – refer to section 1).

13.1.16 This involved Officers from the district and county councils, local councillors, residents and representatives from other local organisations such as the Kings Langley Community Association. An Officer from Three Rivers District Council and representatives from Abbots Langley Parish Council (in Three Rivers District) also attended. A range of questions were asked in relation to crime and anti-social behaviour, leisure and recreation, transportation, the environment, housing, employment, population, development options and design/character of the village.

13.1.17 Key priorities for the village included addressing traffic in the High Street by implementing some traffic calming measures; avoiding coalescence with larger settlements to the north and south, preserving the 'village' character and retaining essential small businesses in the local centre.

(b) *Emerging Core Strategy* (see Volume 4 of Report of Consultation).

13.1.18 The Emerging Core Strategy (Examination Document CS8) contained draft settlement strategies for each place, with background context covering siting and size, landscape and built character, key views, leisure, sports and community facilities, and local business. The evidence base was summarised and presented by place at this stage to inform the consultation. Feedback was requested on a dwelling level of 150 new homes and on two greenfield sites: Rectory Farm and Wayside and Broadfield Farms.

13.1.19 Consultation feedback was generally positive, with the vision for Kings Langley being largely support. Issues raised included:

- Concerns that local services and infrastructure are already at capacity – especially schools.
- Growth should help to maintain a healthy balance between ages and income brackets to give a viable, diverse and inclusive village.
- The need to maintain Kings Langley as a village.
- Objections to the two greenfield housing options.

(c) *Consultation Draft* (see Volume 6 of the Report of Consultation)

13.1.20 In this version of the plan, feedback was sought on the proposed Kings Langley Place Strategy. As the outward expansion of the villages had been discounted for the reasons set out in paragraph 13.1.13, the main role of this consultation was to seek feedback on the proposed level of development (100 new homes) and highlight any specific issues that had become apparent for Kings Langley and what alternative options were for tackling these issues.

13.1.21 Feedback from this consultation was generally positive. There was support for

improvements to both primary and secondary schools, and for the relatively low overall level of growth proposed. Three Rivers District Council stated its general support for the proposed strategy.

(d) Citizen's Panel

13.2.22 Views from residents were separately sought through the Council's Citizens Panel. This helped to ensure that the views and aspirations of a representative range of people from all parts of the borough were considered.

13.2.23 There was a low level of response to the consultation regarding Kings Langley. Responses that were received highlighted a high level of support for the general approach to the village.

Sustainability Appraisal

13.2.24 Sustainability Appraisal (incorporating Strategic Environmental Assessment) has considered the issue of the distribution of growth (see response to Issue 2) and also considered each individual place strategy against a series of sustainability criteria (which were agreed following consultation with key bodies). The full assessments are contained in Examination Document SUB3. Key conclusions as follows:

- In terms of biodiversity the proposed new level of housing will required some development to take place on greenfield land which could have adverse impacts on habitats and species due to land take and habitat fragmentation.
- The spatial strategy recognises that the canal is an important part of Kings Langley and future development must relate well to the canal corridor. Therefore, this could have a positive impact on water quality and should help maintain the water dependent wildlife sites in the area.
- The spatial strategy recognises that new development should be consistent with the distinctive character of the village and respect the Conservation Areas.
- Maintaining the local shopping and service role of the village centre will help to progress SA objectives by reducing the need to travel to neighbouring centres.

Conclusions

13.2.25 Kings Langley is a relatively large village, with a population of around 4,000 people. It straddles the boundary of Dacorum Borough and Three Rivers District and has a strong relationship with Abbots Langley (in Three Rivers) which it adjoins.

13.2.26 The village is set within attractive landscape of the Upper Gade Valley on the southern edge of the Chiltern Hills. The town's urban structure, character and biodiversity are recognised in the Vision Diagram. The River Gade, Grand Union Canal and main rail line between London and Birmingham run through the village. There are good road links to Hemel Hempstead, Watford and beyond – in part due to the proximity of the village to the M25.

13.2.27 The village has a vibrant, historic local centre with a wide variety of shops and restaurants and attractive buildings.

13.2.28 The key issue has been how far the village should accommodate growth and change. Expansion of the village into the Green Belt has been discounted due to the recent (and continuing) high levels of residential development in the Three Rivers side of the village, and the implications this has for the capacity of local schools and other services and facilities.

13.2.29 Seen within this context, it is considered that the approach set out within the Kings Langley Place Strategy is both appropriate and justified.

13.2.30 A specific policy for Kings Langley is not considered to be necessary. The Place Strategy contains a vision, followed by a series of objectives – both those common to all places and specific local objectives and an overall strategy for the village.

13.2.31 The Place Strategy is intended to explain what the Council will do to achieve the vision and objectives. This is supported through policies in the 'theme' sections of the Core Strategy and will be further supported by the other documents that will comprise the Local Planning Framework e.g. specific site allocations. The Place Strategy is the one location where the policy main threads for Kings Langley are brought together, and was considered beneficial to local communities in understanding how the planning framework related to the town.

13.2.32 It is unnecessary to have a separate policy. Separate policies are only contained for the two 'Key Regeneration Areas' within the Borough, which are both located at Hemel Hempstead (see Key Diagram, Map 1 of the Pre-Submission Core Strategy). These policies act as a framework to guide significant levels of growth and change in these locations and provide a clear context for the associated master plans.

13.2.33 What may however be helpful is for the Council to explain the above approach more clearly in section 19, which provides an introduction to the place strategies. This would be the best place to articulate the approach which is common to all place strategies.

13.2 Is the Council's approach to education provision satisfactory and in particular is it clear what policies apply to Kings Langley Secondary School?

13.2.1 Hertfordshire County Council has expressed satisfaction with the Borough Councils approach to addressing educational needs within the village. The Borough and County Council have a good working relationship and will continue to co-operate (as set out in Examination Document SUB8) to find positive solutions to educational issues within the village (and across the Borough).

13.2.2 Kings Langley Secondary School is designated as a Major Developed Site (MDS) in the Green Belt. This designation is explained in paragraphs 8.30-8.32 of the Pre-Submission Core Strategy (Examination Document SUB1). The boundary of

this MDS is shown on the Proposals Map. Policy CS5: Green Belt states that proposals for designated Major Developed Sites will be determined in accordance with national Green Belt policy.

13.2.3 Policy CS23: Social Infrastructure sets out the Council's broad approach towards new school facilities. This includes the clear principle that social infrastructure that provides services and facilities to the community will be encouraged.

13.2.4 The Council has discussed the need for future school expansion with Officers from the County Council. It has formally written to the County Council in response to previous Core Strategy representations to explain that both the outer and inner (infill) boundary of the MDS will be reviewed through the Site Allocations DPD. In the meantime, the Council will apply its policies in a flexible and pragmatic manner that takes into account the recognised need for upgrading existing facilities. It will however be important to ensure that any new development does not increase the site's impact on the openness of the Green Belt. This can be achieved through the careful location of new buildings within the school site. This approach is accepted by Hertfordshire County Council as confirmed in the Statement of Common Ground prepared by the two parties (Examination Document SG4).

13.2.5 Funding for the new / upgraded secondary school has been secured direct from Government (through the Priority Schools Building Programme), and is therefore not reliant upon developer contributions.

13.2.6 See also response to questions 13.3 and 13.4 below and the response to Issue 8: question 8.2.

13.3 Have the consequences of infill development on local infrastructure (including highways, car parking, schools and health services) been satisfactorily addressed?

13.3.1 The Council is satisfied that the consequences of development on local infrastructure, as far as is practical, have been addressed. It recognises that Kings Langley is a relatively busy village, reflecting its popularity and attractiveness as a place to live. The village's infrastructure is sensitive to growth, and there are some constraints that include the issue of the provision of a new primary school facility in the area and the upgrading of secondary school facilities.

13.3.2 The need to ensure the timely provision of key infrastructure has informed the development of the Core Strategy from the beginning of the process and is threaded throughout the document – from the strategic objectives at the beginning to Policy CS35: Infrastructure and Developer Contributions in the final section.

13.3.3 The Council has worked closely with infrastructure and service providers at each stage of the Core Strategy as reflected in the work on the Infrastructure Delivery Plan and Dacorum Strategic Infrastructure Study (Examination Documents ID1).

13.3.4 The liaison with infrastructure providers undertaken for the Infrastructure Delivery Plan update (Examination Document ID5) included consideration of the timing of infrastructure provision. The Council gave the providers a breakdown of the sites in the housing trajectory by location and expected delivery date to inform their

assessments. As set out in the Infrastructure Delivery Plan the providers confirmed that the necessary infrastructure can be provided in time to serve the development at the expected timescales. No 'showstoppers' were identified for either Kings Langley or the Borough as a whole.

13.3.5 The Infrastructure Delivery Plan (ID5) identifies a feasibility study for a new primary school in the Bedmond / Abbot's Langley / Leavesden area. The threshold for this school would relate directly to the level of local housing proposed in the area. Dacorum Borough Council is working closely with Three Rivers District Council and Hertfordshire County Council in relation to this issue. The current conclusion is that in terms of provision within Dacorum, an additional school in the south of Hemel Hempstead would be sufficient to meet all relevant needs. This choice of location reflects information from the county council that showed about 42% of children currently attending Kings Langley Primary come from south east Hemel Hempstead. Hertfordshire County Council's current advice that this new school is not required until post 2016. The need for additional primary school provision is acknowledged within the Hemel Hempstead Place Strategy and will be progressed through the Site Allocations DPD. The County Council and Borough Council have already had informal discussions regarding potential sites for this new school. This will free up places at Kings Langley School for village residents. Policy CS23: Social Infrastructure has also been drafted to allow flexibility with regard to the expansion of the existing primary school site. (See also response to question 13.4 below)

13.3.6 Although parking and congestion was highlighted as an issue through the Place Workshops, no specific parking issues within the village have been identified. It is noted that there are on-street parking bays in the High Street and two public car parks within the village centre. This is a high level of provision when compared to a village of comparable size i.e. Bovingdon, which has no public car parks. Highway issues are considered generally in section 9 of the Pre-Submission Core Strategy, as amended by minor changes MC17 and MC18. The former of these changes refers to the need for all major new development proposals to be accompanied by a transport assessment, covering the relevant parts of the highway network and transport infrastructure. All development will be expected to accord with Policies CS8: Sustainable Transport and CS9: Management of Roads.

13.3.7 In terms of primary healthcare, the Infrastructure Delivery Plan Update (Examination Document ID5, paragraph 4.28) notes that modest growth of up to 500 registrations may be possible at the doctors surgery within the village. However, the impact of growth from Three Rivers (Abbots Langley) will need to be taken into account. The village has good access to secondary healthcare facilities i.e. Hemel Hempstead Local General Hospital (which has a 24 hour urgent care centre) and Watford hospital, which provides a wider range of facilities, including A&E.

13.3.8 It should be noted the level of growth in the Place Strategy is indicative rather than an absolute target (paragraph 19.4 in the Core Strategy (Examination Document SUB1), and assumes all available opportunities come forward. In reality, as at 1st April 2012 some of the new housing has already been built or is committed (Residential Land Position Statement: Examination Document) and

development is likely to be spread over the lifetime of the plan, which will help even out demands on the infrastructure and allow it to better adjust to change.

13.3.9 Overall, the infrastructure needs of the village are anticipated to be small. Infrastructure providers have not highlighted any particular issues for the village, with the exception of the primary school capacity, for which there is a practical and deliverable solution. Furthermore, all new schemes will need to contribute directly and/or financially to local infrastructure to support the development, in accordance with Policy CS35: Infrastructure and Developer Contributions.

13.4 Can it be demonstrated that the Council has and will continue to co-operate with Three Rivers District Council with regards to development at Kings Langley?

13.4.1 The village of Kings Langley straddles the Dacorum / Three Rivers boundary, which follows the line of the Grand Union Canal. As illustrated in Figure 25: Kings Langley Vision Diagram and text within the Place Strategy, the majority of the residential area and village services and facilities are to the west, within Dacorum, whilst some residential development and open space and the majority of employment land lies to the east in Three Rivers.

13.4.2 As a result of this, the Council has taken a co-ordinated approach to the issue of future growth and change within the village and has encouraged Three Rivers Council to do the same. When drawing up the Place Strategy consideration has been given to the needs of the village as a whole, rather than the part within the Council's administrative area. Three Rivers Council has supported this approach – as illustrated by the attendance of an Officer and elected representatives from Abbots Langley Parish Council at the Place Workshops (see Volume 3 of the Report of Consultation: Examination Document SUB6).

13.4.3 Dacorum Borough Council and Three Rivers District Council have a positive working relationship and will continue to engage constructively in terms of cross boundary issues. Hertfordshire County Council will also play a key co-ordinating and advisory role in their capacity as both highway authority and local education authority.

13.4.4 As set out in the Statement of Compliance with the Duty to Co-Operate (Examination Document SUB8), the Council envisages further collaborative planning with Hertfordshire County Council and Three Rivers District Council, particularly in terms of the completion of their local planning frameworks and infrastructure planning within the village and the lower Gade valley as a whole. Dacorum and Three Rivers Councils have already asked for feedback on their respective Infrastructure Delivery Plans and will continue to do so with regard to future updates.

13.4.5. The need to consider the cumulative effects of growth upon infrastructure – particularly primary schools - in the Kings Langley area was considered at the Three Rivers Core Strategy Examination in June 2011 (see the Three Rivers examination website for further information <http://www.threerivers.gov.uk/Default.aspx/Web/CoreStrategyExamination>). In

the statement of common ground prepared between the two councils it was agreed that:

- Three Rivers and Dacorum Councils will continue to work together and will jointly monitor the cumulative effect of development on infrastructure in the Kings Langley area, through annual updates of the Infrastructure Delivery Plans; and
- Three Rivers, Dacorum and Hertfordshire County Council will continue to monitor and share information about the need for primary school provision as sites in the area come forward. In assessing applications for housing development in the Kings Langley area, Three Rivers will liaise with Hertfordshire County Council to confirm whether critical levels of primary school provision will be breached, and if so, that provision has been provided for.

13.4.6 The adopted Three Rivers Core Strategy recognises Kings Langley as *“a cross boundary village shared with Dacorum Borough Council, which therefore requires a co-ordinated approach between the two authorities in planning for the future of the village.”*

13.4.7 Although cross-boundary issues are already reflected within the Kings Langley Place Strategy, a similar statement to that within the Three Rivers Core Strategy could be added, if the Inspector considers this to be necessary.