St Albans Local Plan Examination - Additional Documents Consultation 4 July - 22 August 2025

Redbourn Parish Council Representations

Ref No	Document (Ref Number)	Source	Summary of Document	Redbourn PC Response
SADC/ED76	**Transport Note relevant to Transport documents SADC/ED76A through to SADC/ED76C**	SADC	Summary document of the transport-related conclusions and next steps arising from the Reg. 19 stage of the St Albans Local Plan, in relation to the Local Highway Network and the Strategic Road Network. The note confirms that HCC, as the local highway authority, has no objection to the LP proceeding to examination, provided that ongoing joint work continues through delivery. It acknowledges that while traffic growth is expected across the district, there are no "showstoppers" or "severe" impacts on the local highway network up to 2041, assuming that the necessary infrastructure investment is secured through planning applications and transport assessments. For the Hemel Garden Communities allocations (H1–H4), the note highlights ongoing work to define mitigation measures, including through	Implications for Redbourn: • M1 Junction 9 and A5183: These routes are critical for Redbourn and may be affected by traffic growth and rerouting linked to Hemel Garden Communities and other development. • Project Breakspear: Although focused on M1 Junction 8 and the A414, the success of these schemes will influence traffic patterns that could spill into Redbourn if not properly managed. • **Modal Shift Assumptions: The note relies heavily on behavioural change to reduce car use. If this is not achieved, Redbourn could experience**

			PPAs with developers such as The Crown Estate and Pigeon/Bloor. Key infrastructure projects include Project Breakspear Phases 1 and 2 (A414/Green Lane junction improvements), which are on the local network but support the strategic network's function. Phase 3, involving an M1 overbridge, is expected to be required post-2041. National Highways has requested further evidence to confirm the robustness of the LP. However, they also conclude that there are no severe impacts district-wide to 2041, conditional on infrastructure delivery and modal shift. Both HCC and National Highways are working with SADC towards Statements of Common Ground on transport matters, to be submitted at Stage 2 of the Examination in autumn 2025. These will include Main Modifications to Local Plan policies to improve effectiveness, including a "monitor and manage" approach.	**increased congestion and rat-running.** • **As RPC has set out in detail in its previous submissions to the Local Plan and Examination, the success of HGC relies on this modal shift / behavioural change from cars to walking, cycling and public transportation. The Local Plan assumes this shift to fully take place by 2041 across the County. This appears to be unrealistic and as a result this could cause severe transport issues for the area.** • It is our understanding that the preferred road layout for HGC (at North and East Hemel) is for a 'sustainable transport corridor' running north to south linking the various developments and hubs together. However, this corridor risks becoming a rat run or an M1 bypass as it effectively links traffic to junctions 9 and 8 of the M1. The only chance of success as a sustainable transport corridor is if 'modal shift' and its enabling

				infrastructure are delivered and active from the very start of the development. • Monitoring and Mitigation: RPC requests that local transport impacts and mitigation measures include rural routes are considered in the Statements of Common Ground with HCC (and potentially others) and in Local Plan policy.
SADC/ED76A	**Comet Forecasting report - Combined Joint Tests 2041 and 2050**	WSP	This document presents the results of strategic transport modelling undertaken to assess the cumulative impacts of proposed development in both SADC and DBC under their respective emerging Local Plans, with a forecast year of 2041. The modelling was conducted using HCC's COMET model, which is designed to simulate traffic flows and network performance across the county. This report specifically evaluates how the combined growth from both Local Plans, including major allocations such as Hemel Garden Communities, will affect traffic volumes, junction performance, and overall network stress. The modelling tests several scenarios, including: • A baseline (no Local Plan growth),	Redbourn Parish is impacted by the findings of the report: • Redbourn lies close to M1 Junction 9 and the A5183, which are forecast to experience increased traffic due to growth in both districts. This could lead to congestion and safety concerns on local roads. • The Hemel Garden Communities allocations are a major contributor to traffic growth in the area. RPC has previously raised concerns about overdevelopment and infrastructure strain, which this report confirms as valid. • **The modelling assumes behavioural changes to reduce**

			• A Local Plan growth scenario with committed infrastructure, • And a scenario incorporating modal shift assumptions (i.e. increased use of walking, cycling, and public transport). Key findings include: • Significant increases in traffic volumes across the network, particularly around Hemel Hempstead, St Albans, and key strategic junctions such as M1 Junctions 8 and 9, and M25 Junction 22. • Without infrastructure upgrades, delays and congestion are forecast to worsen, especially in peak hours. • With planned infrastructure and realistic modal shift, the network can accommodate growth, but with limited resilience and potential pressure points remaining. • The modelling highlights the importance of coordinated infrastructure delivery between SADC and DBC, especially in shared corridors like the A414 and the M1.	**car use. If these are not achieved, Redbourn could face increased rat-running and traffic diversion through its rural road network.** • The report reinforces the need for targeted mitigation measures and monitoring in areas like Redbourn, which may not be the focus of strategic infrastructure but are vulnerable to secondary impacts.
SADC/ED76A.i	**Appendix 1 - HGC Trigger Point Technical Note**	WSP	Transport modelling (COMET) assessment focused on identifying the point at which infrastructure upgrades, specifically at M1 Junction 8 and the A414 Breakspear Way/Green Lane junction, become necessary to support the Hemel Garden Communities development.	Implications: • Traffic Spillover Risk: If infrastructure upgrades at M1 Junction 8 and the A414 corridor are delayed or under-delivered, traffic may divert through alternative routes, including the

			The modelling scenario includes all committed developments and infrastructure across Hertfordshire to 2041, as well as housing and employment allocations from both SADC and DBC Local Plans. It incorporates mitigation schemes from both councils' Infrastructure Delivery Plans and assumptions about modal shift. Two sensitivity tests were run: • One with reduced employment at East Hemel Central (from 8,000 to 4,000 jobs), reflecting updated forecasts from the Crown Estate and Hertfordshire Futures. • Another with reduced trip generation, to test the impact of lower traffic demand. The modelling focused on congestion and delay at the A414 Breakspear Way corridor and M1 Junction 8. It found that: • Without intervention, delays and queueing increase significantly, especially in AM peak. • The signalisation of the A414/Green Lane junction is necessary early in the HGC build. • The M1 Junction 8 overbridge upgrade (Breakspear Phase 3) is likely needed after 2041, but its timing depends on actual traffic growth and delivery rates. • The report recommends a "monitor and manage" approach, with infrastructure delivery tied to specific trigger points in the development trajectory.	A5183 and rural roads near Redbourn. • Dependency on Modal Shift: The modelling assumes significant behavioural change. If this is not achieved, Redbourn could experience increased congestion and rat-running.

SADC/ED76A.ii	**Appendix 2 - SLR Vectos - 000197.R002.Hemel Local Plan Modelling Overview**	Vectos	The report compares two modelling tools: • COMET: HCC's strategic transport model, used for county-wide forecasting. • HHPM (Hemel Hempstead Paramics Model): A microsimulation model used for detailed, localised analysis of traffic flows and junction performance. The COMET model was used to assess strategic-level impacts of growth and infrastructure delivery across the wider network, while HHPM was applied to test specific junction layouts and localised traffic behaviour in Hemel Hempstead. The report highlights the benefits of microsimulation modelling, including its ability to capture detailed interactions at junctions and reflect real-world driver behaviour, though it also notes limitations such as data sensitivity and calibration complexity. The modelling incorporated various growth scenarios, including full build-out of HGC, and tested infrastructure interventions such as upgrades to the A414/Green Lane junction and M1 Junction 8. It found that: • Without mitigation, congestion and delays would increase significantly, especially in peak hours. • Infrastructure upgrades and modal shift assumptions (i.e. increased use of walking,	As above.

			cycling, and public transport) are essential to accommodate growth. • A phased approach to infrastructure delivery is recommended, with trigger points tied to development milestones. The report concludes that the proposed development is feasible from a transport perspective, provided that infrastructure is delivered in a timely and coordinated manner and that modal shift targets are met.	
SADC/ED76B	**St Albans Local Plan Transport Forecasting & Narrative Document**	SADC	The modelling acknowledges that traffic growth is expected in the district by 2041 even without the Local Plan allocations. When the proposed development sites are added, traffic volumes increase by an additional 5–9%, depending on the level of modal shift assumed, from car use to walking, cycling, or public transport. The modelling incorporates infrastructure improvements identified in the Infrastructure Delivery Plan, which help alleviate pressure on key corridors, especially the A414, and on rural routes that might otherwise be used as rat runs. One of the most critical areas identified is the A414/Green Lane junction, which is forecast to experience significant delays and queueing, particularly westbound, with a risk of traffic backing up onto the M1 northbound off-slip. The modelling tests alternative junction layouts and finds that with certain design tweaks,	Significant impact expected: Redbourn Parish lies close to Hemel Hempstead and the A414 corridor, meaning traffic pressures and infrastructure changes will affect local routes. Modal shift assumptions are critical: if not achieved, rural areas like Redbourn may experience increased rat-running and congestion. M1 Junction 8 and 9 upgrades are vital to prevent spillover traffic into Redbourn and surrounding villages. RPC questions: • The realism of modal shift assumptions. Insufficient active and sustainable travel. • The adequacy of mitigation measures for rural routes.

			delays can be reduced and queueing managed more effectively. The modelling also considers the cumulative impact of growth in neighbouring Dacorum, especially around Hemel Hempstead, and finds that coordinated infrastructure planning is essential to avoid network stress. The narrative also explores scenarios with lower employment growth, which show improved traffic performance and reduced delays, particularly in the East Hemel area. Given the uncertainties around future job growth and travel behaviour, the Council recommends a "monitor and manage" approach to infrastructure delivery, especially at critical junctions. The modelling narrative supports the Local Plan's growth strategy but highlights the importance of delivering infrastructure upgrades and achieving modal shift to ensure the transport network remains functional. It also underscores the need for ongoing monitoring and flexibility in response to changing conditions.	• The coordination between St Albans and Dacorum in managing cumulative impacts under the Duty to Cooperate.
SADC/ED76B.i	**Joint Comet Run Addendum Hemel Garden Community Comet Test**	WSP	The report evaluates multiple future scenarios, including baseline growth, Local Plan allocations, and infrastructure interventions. It incorporates assumptions about housing and employment growth, transport infrastructure upgrades, and behavioural changes such as	As above.

			modal shift (i.e. people switching from car use to walking, cycling, or public transport). The modelling tests the performance of key junctions and corridors, particularly around Hemel Hempstead and the A414 corridor, under different growth and infrastructure configurations. One of the central findings is that without significant infrastructure upgrades—especially at junctions like A414/Green Lane and M1 Junction 8—traffic congestion and delays will increase substantially. The modelling shows that with the proposed infrastructure and a realistic level of modal shift, the network can accommodate the growth, but only just. The report also highlights the importance of coordinating growth and infrastructure delivery between St Albans and Dacorum, given the shared pressure points and overlapping development areas.	
SADC/ED76C	**SADC Comet Run 2041 addendum - July 2025**	SADC	The modelling includes: • Flow change plots showing both absolute traffic volumes and changes attributable to Local Plan growth. • Detailed analysis of approach arms at major junctions, identifying where increases exceed thresholds (e.g. more than 30 vehicles per approach arm or 100 vehicles at merge/diverge points).	As above. The document also fails to explain any coordination and modelling together with neighbouring LPAs, especially with Dacorum BC.

			• Assessment of mode shift effects and the influence of planned infrastructure schemes from the Infrastructure Delivery Plan (IDP). The addendum confirms that the modelling was conducted for both AM and PM peak hours, and that the outputs were shared with National Highways in the form of spreadsheets and technical notes. These outputs are intended to support ongoing dialogue and ensure that the Local Plan's transport impacts are fully understood and mitigated. It reinforces the importance of coordinated infrastructure delivery and ongoing monitoring of traffic impacts, particularly on the SRN, as the Local Plan progresses toward adoption. It also demonstrates the Council's responsiveness to statutory consultees and its commitment to evidence-based planning.	
SADC/ED76C.i	**Appendix 1: 2024 Feb Technical Note**	WSP	Technical document with no significant value to RPC.	No response.
SADC/ED76C.ii	**Appendix 2: May 2024 Technical Note**	WSP	Technical document with no significant value to RPC.	No response.
SADC/ED76C.iii	**Appendix 3: January 2025 Technical Note**	WSP	Technical document with no significant value to RPC.	No response.
SADC/ED76C.iv	**Appendix 4: March 2025 Technical Note**	WSP	Technical document with no significant value to RPC.	No response.
SADC/ED76C.v	**Appendix 5: April 2025 Technical Note**	WSP	Technical document with no significant value to RPC.	No response.

SADC/ED76C.vi	**Appendix 6: May 2025 Technical Note**	WSP	Technical document with no significant value to RPC.	No response.
SADC/ED76C.vii	**Appendix 7 - St Albans & HCC LP Modelling Report**	WSP	The report assesses traffic flows, junction performance, journey times, and network stress across the district and surrounding areas. It identifies key pressure points, particularly around Hemel Hempstead, St Albans City, and the A414 corridor, and evaluates the effectiveness of proposed infrastructure interventions. The modelling shows that without significant upgrades, especially at junctions like A414/Green Lane and M1 Junction 8, traffic congestion and delays will increase substantially. However, with the proposed infrastructure and modal shift assumptions, the network can accommodate the growth, albeit with limited resilience. The report also highlights the importance of coordinated planning between St Albans and neighbouring authorities, particularly Dacorum, given the shared transport corridors and cumulative impacts of growth.	The Duty to Cooperate in relation to infrastructure delivery is essential, as highlighted in the report. While Redbourn is not the primary focus of the modelling, several implications arise: • Redbourn lies close to key transport corridors identified as under pressure. Increased traffic from Hemel Garden Communities and other growth areas could lead to congestion on local roads, especially if strategic junctions are not upgraded. • The modelling relies heavily on behavioural change to reduce car use. If these assumptions are not met, rural areas like Redbourn may experience increased rat-running and traffic diversion. • The success of the Local Plan's transport strategy depends on timely delivery of infrastructure. Delays or underfunding could disproportionately affect smaller settlements like Redbourn, which

				rely on regional connectivity. As set out in RPC's previous submissions the Infrastructure Delivery Plan lacks detail and certainty.
SADC/ED76C.viii	**Appendix A: St Albans LP - SRN Flow Tables**	WSP	Technical excel sheet with junction traffic flow calculations.	No response.
SADC/ED76C.ix	**Appendix B M1 J9 NB Diverge Assessment v2.**	SADC	Technical excel sheet with junction traffic flow calculations.	No response.
SADC/ED76C.x	**Appendix C M1 Junction 9 Safety Assessment 1.0**	SADC	M1 Junction 9 Initial Road Safety Assessment: technical review assessing the safety implications of proposed alterations to the northbound off-slip at M1 Junction 9, which connects to the A5183 near Redbourn. The assessment was conducted by a qualified road safety auditor using desktop tools (Google Streetview, aerial imagery, and collision data from the WSP GB Collision Dashboard), covering a five-year period from 2018 to 2023. The proposed changes to M1 Junction 9 include: • Widening the northbound off-slip to provide two lanes. • Relocating gantry and count marker signs. • Extending the Vehicle Restraint System (VRS). • Designing the off-slip to Layout B Option 2 (two-lane auxiliary diverge) under national highway standards.	The assessment was not based on a site visit, and it relied on Google Streetview and aerial images, which reduces the robustness of the assessment. • M1 Junction 9 is a key access point for Redbourn, especially for traffic travelling to and from the A5183. The proposed widening and safety upgrades could have several implications: • Temporary disruption during construction could affect local traffic patterns, especially on the A5183 and nearby rural roads. • If improvements at Junction 9 lead to increased traffic volumes or if congestion persists, there may be a risk of more vehicles diverting through Redbourn.

SADC/ED76C.xi	**Appendix C M1 J9 70119618-WSP-XX-XX-DR-LP-0100-01 (P02)**	SADC	Drawing in support of the M1 Junction 9 Initial Road Safety Assessment.	No response.
SADC/ED76C.xii	**Appendix C M1 J9 70119618-WSP-XX-XX-DR-LP-0100-02 (P02)**	SADC	Drawing in support of the M1 Junction 9 Initial Road Safety Assessment.	No response.
SADC/ED76C.xiv	**Appendix C M1J9 70119618-WSP-XX-XX-DR-LP-0100-04 (P02)**	SADC	Drawing in support of the M1 Junction 9 Initial Road Safety Assessment.	No response.
SADC/ED76C.xv	**Appendix C M1J9 70119618-WSP-XX-XX-DR-LP-0100-05 (P02)**	SADC	Drawing in support of the M1 Junction 9 Initial Road Safety Assessment.	No response.
SADC/ED76C.xvi	**Appendix D HCC_St Albans Meeting 12.05.2025**	Herts CC	The document is a technical note summarising a meeting between HCC and SADC regarding transport modelling and infrastructure implications of the emerging Local Plan. The meeting focused on key junctions affected by proposed development, including M1 Junction 9 and M25 Junction 22, and reviewed data inputs, modelling assumptions, and outputs from the COMET strategic transport model. At M1 Junction 9, HCC provided OS and LIDAR data to support further modelling work, which was pending highway boundary data. The modelling identified a net increase of 136 passenger car units (PCUs) on the northbound diverge, with nearly half (49%) directly attributable to Local Plan sites. Notably, 37 PCUs were forecast to originate from Local Plan	As per the points raised above, M1 Junction 9 is a critical access point for Redbourn, via the A5183. The modelling confirms that this junction will experience increased traffic volumes due to Local Plan allocations, particularly from East Hemel. This raises several concerns for Redbourn: • Increased use of M1 Junction 9 may lead to congestion on the A5183 and surrounding rural roads, potentially affecting Redbourn's local network. • The need for further design work and data collection suggests that current plans may not yet fully

			sites (36 from East Hemel, 1 from London Colney), and 31 PCUs were heading to Local Plan sites (26 to North East Harpenden, 5 to North St Albans). These figures highlight the junction's strategic role in accommodating growth-related traffic. The meeting confirmed that further modelling and design work would be required to assess mitigation options and ensure safe and efficient operation of these junctions under future growth scenarios.	address safety and capacity concerns. • The combined effect of traffic heading to and from multiple Local Plan sites near Redbourn (East Hemel, Harpenden, St Albans) could exacerbate congestion and rat-running through the village.
SADC/ED77	**Flood Risk Addendum**	SADC	The Council asserts that no sites were allocated where there were reasonably available alternatives in lower-risk areas. Where sites were retained despite some flood risk, it was because: • The risk was minor or could be mitigated. • The site was otherwise highly sustainable and met other strategic objectives. Sites were screened using a GIS-based approach to identify those intersecting with Flood Zones 2, 3a, and 3b, and areas of surface water flooding. Sites with significant flood risk were either: • Excluded from allocation. • Reduced in size to avoid high-risk areas. • Required to demonstrate mitigation through site-specific flood risk assessments.	Site M6 (South of Harpenden Lane) in Redbourn is one of the sites affected by flood risk. The Flood Risk Addendum confirms that site M6 was retained only where mitigation is possible and justified. RPC challenges whether the Sequential Test was robustly applied to M6, given the extent of Flood Zones 2 and 3 on the site, as well as groundwater and surface water flood risk on site. The viability of SuDS on site may be jeopardised due to high groundwater levels and other physical constraints of the site. The paper reinforces the need for site-specific flood risk assessments

			Regarding M6: more than 10% of the site is at risk of surface water flooding at 1% AEP; this is site M6 South of Harpenden Lane with 22% of the site at this level of flood risk. The indicative housing capacity for this site has already been reduced to take account of the proportion of the site subject to flood risk. The Addendum concludes that the approach to surface water flood risk for larger sites for the sequential test is that this type of flood risk can be managed on site through design and layout, and mitigation measures such as SuDS.	and SuDS, which Redbourn PC insists should fully evidenced before any development proceeds (if it were to be retained in the Local Plan as an allocation). A thorough assessment and overlay of surface, fluvial, reservoir and groundwater flooding areas should be carried out and provided to understand the actual capacity for development of the site. Housing numbers may have to drop further below the current figure of 68 units.
SADC/ED78	**Green Belt: Previously Developed Land - Clarification**	SADC	Three sites were allocated under the "Green Belt Previously Developed Land", contributing a total of 137 homes. These sites were selected since: They contained built development likely to meet the NPPF definition of PDL, they could deliver 5 or more homes, they were assessed as not causing substantial harm to the Green Belt. The Council explains why certain sites discussed during hearings were not allocated, citing issues such as: • Lack of sufficient built form. • Greater impact on openness. • Conflicts with Green Belt purposes.	Limited existing permanent built form is used by the Council as a reason for not allocating sites as a Green Belt PDL site. However, a calculation of the percentage of PDL area on each site ranges from 2% - 100% with a total of approximately 21 hectares of PDL in total.
SADC/ED79	**Meeting identified accommodation needs**	SADC	The Council confirms the need for 40 pitches for Gypsies and Travellers and 5	The Tullochside Farm site, located between Hemel Hempstead and

	of Gypsy Traveller and Travelling Showpeople - additional clarification		plots for Travelling Showpeople between 2024 and 2041. These figures are based on the Gypsy and Traveller Accommodation Assessment (GTAA) and updated definitions under national planning policy. The Local Plan proposes to meet this need through: Two new sites within Hemel Garden Communities (East Hemel Hempstead South and Central), each accommodating 15–20 pitches. Extensions or reconfigurations of existing sites, including Tullochside Farm. Temporary permissions being made permanent where appropriate.	Redbourn, is identified for potential expansion or reconfiguration. RPC has previously raised concerns about over-concentration of sites near Redbourn, especially in combination with Dacorum's proposals. Sites should be allocated where the need is and where there is sufficient infrastructure and services. The confirmation of two large new sites at East Hemel Hempstead (close to Redbourn) and potential expansion of Tullochside Farm would intensify these concerns. This could have implications for local infrastructure, landscape character, and community cohesion, and will warrant further representation or engagement by Redbourn Parish Council as part of a potential Stage 2 Examination. We also note the following regarding the high concentration ff existing and proposed sites: • There is a travellers' site proposed in Redbourn Parish, alongside Punch Bowl Lane in the Hemel East Central

				(employment) area of HGC. It is just inside the parish border. We want to highlight this as it is not that clearly visible in the evidence base. • There is also the Ver Meadows (HCC) site in Redbourn which recently burnt down but is being reinstated. • The travellers' site at Three Cherry Trees, whilst located in Dacorum is near the border with Redbourn/St Alban's District. In addition, there is another travellers' site planned at North Hemel in the Dacorum side of HGC.
SADC/ED80A	**SADC position on Chilterns National Landscape boundary extension cancellation**	SADC	Natural England announced in May 2025 that it would cease work on the Chilterns boundary extension project due to funding constraints. This decision directly affects the rationale behind excluding certain sites from the Regulation 19 Draft Local Plan, which had been removed based on their location within a proposed "area of search" for the extension. The Council acknowledges that: • The proposed extension had influenced earlier stages of the Local Plan, particularly the Regulation 18 consultation.	RPC raised concerns about landscape protection and the setting of the Chilterns National Landscape in its Regulation 19 representations. Policy NEB11 (Chilterns National Landscape) may need to be revisited to reflect the cancellation and clarify its scope regarding the setting of the existing boundary.

			• Natural England had identified several sites within the northern part of the district as potentially falling within the extended boundary. • However, the Council clarifies that the area of search did not affect the Spatial Strategy or any Broad Locations or Large Sites in the Regulation 19 Plan. • Only four small residential sites were excluded from the Regulation 19 Plan due to their location within the proposed extension area. • With the extension no longer progressing, the Council acknowledges that the rationale for excluding these four sites is no longer valid. It maintains that the overall Spatial Strategy and major allocations remain unaffected. • Likely Outcome: These sites are now being reconsidered for allocation, and the Planning Inspectors have asked the Council to clarify their position. The Council indicates that there is no longer any reason to exclude them. The document includes a transport and heritage assessment of the four sites.	
SADC/ED80B	**Statement on behalf of Jarvis Homes (rep ID 205) on Chiltern**	SADC	The statement submitted by DLA Town Planning on behalf of Jarvis Homes, addresses the exclusion of four sites from the LP due to a	An increase in housing allocations in other parts of the district could potentially result in a lower housing figure for Redbourn – particularly

	National Landscape extension update.		proposed extension of the Chilterns National Landscape (formerly AONB). The key argument is that the Council removed four sites (for up to 100 dwellings)—specifically including Land at Beesonend Lane, Harpenden (known as M14 (43 dwellings)—from the Regulation 19 Draft Local Plan based on the assumption that Natural England would extend the Chilterns National Landscape boundary. However, Natural England confirmed in May 2025 that the boundary extension project has been cancelled. The statement argues that excluding sites based on a speculative designation was inappropriate and unsound. It calls for the Council to revisit its decision, especially since the Beesonend Lane site was previously recommended for release in the Green Belt Review and included in the Regulation 18 draft plan.	when considering the Sequential Test for flood risk. This would result in a more balanced spatial distribution of development given that the scale of development proposed in Redbourn does not relate to its role in the Settlement Hierarchy and its lack of a railway station.
SADC/ED81	**Site Sifting Process Addendum**	SADC	Technical paper to explain how the pool of potential development sites was narrowed down for the Regulation 19 Draft Local Plan. The document outlines a three-stage sifting process applied to 678 initial sites identified through the 2021 HELAA and the UCS. These sites were assessed for suitability, availability, and deliverability. The first sift removed 112 sites, the second sift removed 346 more, and a final pre-Regulation 19 sift removed 117 sites.	RPC is concerned that further assessment work by SACDC may be required to understand the details of sites in the Green Belt in the event that these could be legitimate development options that were overlooked by the Council. If further assessment work were to lead to more housing allocations being proposed in the Green Belt this could lead to a change to the

			This left 103 sites that were ultimately allocated in the Draft Local Plan. The paper distinguishes between sites submitted via the Call for Sites (mostly Green Belt and urban greenfield) and those identified in the UCS (brownfield land). It also explains why certain sites were excluded, such as those outside the Green Belt buffer, superseded submissions, or sites already built out. The Council used detailed site selection proformas to assess remaining sites, considering factors like accessibility, landscape impact, flood risk, and infrastructure needs. Overall, the document aims to demonstrate that the site selection process was transparent, evidence-based, and aligned with national planning policy.	nature of the Local Plan's development strategy and would require significant public consultation and updates to extensive evidence base supporting the Local Plan.
SADC/ED81A	**Appendix 1 - HELAA Green Belt site sifting**	SADC	List of HELAA sites sifting.	See above
SADC/ED81B	**Appendix 2: Urban capacity site sifting**	SADC	List of UCS sites sifting.	See above.