

16th October 2025

Stage 2 Hearing Statements – Matter 7

St Albans City & District Local Plan

On behalf of Lands Improvement Holdings & Lawes
Agricultural Trust

Contents

- Matter 7 – Residential Site Allocations
- Matter 9 – Housing Land Supply
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Stage 2 Hearings – St Albans City & District Local Plan

Weeks 4, 5 and 6 MIQ Response on behalf of Lands Improvement Holdings ('LIH') and Lawes Agricultural Trust ('LAT').

Overview

- 1.1 This response to the Stage 2 Examination, weeks 4, 5 and 6 Matters, Issues and Questions (MIQ's) has been prepared by Urbanissta Ltd on behalf of Lands Improvement Holdings ('LIH') and Lawes Agricultural Trust ('LAT') in relation to the Land at North East Redbourn ('Site').
- 1.2 The MIQ responses made in respect of weeks 4, 5 and 6 relate to:
 - **Matter 7 – Residential Allocations.**
 - Matter 9 – Housing Land Supply.
 - Matter 11 – Natural Environment.
- 1.3 Assistance has been provided by Town Legal (TL) in preparing these representations.
- 1.4 We note that Main Modifications to the Regulation 19 version of the Local Plan have been published by St Albans City & District Council (StADC), and these have been considered in our representations below. The documents included within this MIQ response include:
 - SADC-ED85A - Reg 19 Local Plan Part A - Main Mods (All modifications)
 - SADC-ED85B - Reg 19 Local Plan Part B - Main Mods (All modifications)
 - SADC-ED85C - Local Plan Table of Modifications
- 1.5 LIH is a strategic development company that acquires land and is the promoter partner of the Site owners, LAT. The Site has been deemed surplus to LAT's operational requirements and is available to provide longer term funding to support LAT. Together LIH and LAT seek to secure the release of the Site from the Green Belt for a residential led development scheme.
- 1.6 These MIQ submissions, supplement update and in some instances rely upon the material prepared and submitted at Regulation 18 and 19 stages of the draft Local Plan, as well as building upon MIQ submissions (oral and written) made for Matters 1 – 3 of the Examination before, during and after the Stage 1 hearing sessions. Submissions have also been made regarding the duty to cooperate (11th June 2025) and the St Albans City and District Council (StADC) Technical Consultation of August 2025 and Stage 2 Hearing Matters 1, 2, 3, 6 and 7. Collectively, these submissions in combination, are referred to in this MIQ Submission, as the "LIH/LAT Submissions"¹.
- 1.7 North East Redbourn is an omission site. A PPA has been agreed with StADC and an outline planning application is targeted for submission in January 2026. It is in a sustainable location, it is grey belt, capable of meeting the 'Golden Rules' as defined by the NPPF (2024). It has been accepted as such, by StADC in a pre-application response dated 23rd May 2025.

"it is considered that the site would be likely to constitute grey belt as defined in the NPPF, and may be capable of meeting the Golden Rules requirements..... the planning policy context has changed significantly since our previous discussions and there is greater potential than was previously the case for the proposal to be considered acceptable in principle."
- 1.8 The Site is not in the National Landscape (NL), or in the setting of the NL. It is located on an eastward facing slope facing away from the NL and is over 2.5km from the NL boundary. Visibility testing has confirmed that the Site and proposed development would not be visible from the NL and therefore would not affect the setting of the NL. North East Redbourn lies toward the edge of the 12.6km Ashridge Commons and Woods buffer and will provide its own SANG as mitigation for any potential impacts arising.

¹ LIH/LAT Submissions:

- Regulation 19 - St Albans Technical Submission - Final Draft - 7th November 2024 and associated material listed in paragraph 2.1 & 2.4 p8;
- Regulation 18 - St Albans Technical Submission - Final Submission - 25th Sept 23 and associated material listed in paragraph 1.6 p8 and the Identified Sites Deliverability Assessment (September 2023).
- Town Legal Letter to StADC 18th June 2024
- Appendix 3 - Green Belt Appraisal & Landscape Analysis 07 November 2024
- MIQ's Submissions Matters 1, 2 and 3 – 14th April 2025.
- Hearing Statement 11th June 2025 on Duty to Cooperate
- LIH Submission to the St Albans Technical Consultation - 18th August 2025 FINAL DRAFT
- Stage 2 MIQ Submissions Matters 1, 2, 3, 6 and 7 – 26th September 2025
- Ora Submissions Matters 1 – 3 Stage 2 Hearings 14th October 2025.

Stage 2 MIQ's

Lands Improvement Holdings & Lawes Agricultural
Trust

Matter 7

Residential

Allocations

Matter 7 – Residential Site Allocations (continued)

WEEK 4

Hearing Day 12: Tuesday 4 November 2025

No Attendance – Written Only

Deadline 17th October 2025

Issue 2 – Harpenden and Hatching Green Site Allocations

Policy B2 – North East Harpenden

Q1 What is the site boundary based on and is it justified and effective? What is expected of development proposals within the area retained as Green Belt?

- 1.9 The LIH/LAT Submissions¹ show in the Identified Sites Deliverability Assessment² that several technical considerations affect site B2 including matters of landownership constraints which affect deliverability; topographical constraints; and unfavourable ground conditions which render the site unable to deliver in part and possibly in whole.

Q2 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

- 1.10 The proposed allocation falls within Green Belt parcels SA-24 and SA-27 of the GBR (2023). They are all assessed as making a strong contribution to the purposes of the Green Belt but are partly recommended for further consideration.

Q3 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

- 1.11 Site B2 has capacity and deliverability constraints so it is questionable whether exceptional circumstances exist to justify amending the Green Belt boundary in this location.

Q4 How have the mix of uses been established and how will development proposals come forward in a coordinated and coherent manner?

- 1.12 The LIH/LAT Submissions¹ particularly in the Identified Sites Deliverability Assessment³ show that the site has complex land ownership considerations which affect the viability and ability of the site to come forward in a cohesive manner, as demonstrated by the EIA scoping submitted in 2024 for part of the site. For example, there is understood to be no collaboration agreement in place between the different land interests which may render the site incapable of comprehensive delivery. It has not been demonstrated that the Site can be developed at full capacity in a viable manner and that it is capable of delivery.

Q5 Can a safe and suitable access to the site be achieved? Is it sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?

- 1.13 The LIH/LAT Submissions¹ indicate in the Identified Sites Deliverability Assessment⁴ that a spine road through the proposed allocation site linking Common Lane and the Lower Luton Road is required to make the proposed development acceptable in transport terms. A mini-roundabout at the junction of Station Road/ Lower Luton Road in Batford is also considered to form a key constraint. Cycle access appears inappropriate and there is limited access to amenities within 800m. Securing appropriate routes through the site appear challenging given topography constraints.

Q6 How have the landscape impacts of the allocation been considered? Can the site be delivered in a way that avoids harmful landscape impact?

- 1.14 The LIH/LAT Submissions¹ show in the Identified Sites Deliverability Assessment⁵ that the elevated nature of the site makes visual impacts a key consideration.

Q7 Is Policy B2 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

² Paragraphs 3.17 – 3.33 - LIH Regulation 18 Submission Identified Sites Deliverability Assessment - 25th Sept 23

³ Paragraphs 3.30 – 3.33 - LIH Regulation 18 Submission Identified Sites Deliverability Assessment - 25th Sept 23

⁴ Paragraphs 3.23 – 3.26 - LIH Regulation 18 Submission Identified Sites Deliverability Assessment - 25th Sept 23

⁵ Paragraphs 3.29 - LIH Regulation 18 Submission Identified Sites Deliverability Assessment - 25th Sept 23

- 1.15 No. Site capacity and deliverability require detailed review and revision. Additional allocations are needed in the Plan for sites such as North East Redbourn, if it is demonstrated that site B2 (and others) cannot deliver as anticipated.

Policy B7 – North West Harpenden

Q1 What is the latest position regarding the development proposals for the site?

- 1.16 LIH/LAT Submissions¹ show in the Identified Sites Deliverability Assessment⁶ the potential drainage and engineering constraints to the Site's potential delivery as proposed in the Plan (including SADC-ED85A, SADC-ED85B and SADC-ED85C).

Q2 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

- 1.17 Site B7 has engineering constraints so it is questionable whether exceptional circumstances exist.

Q3 Is Policy B7 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

- 1.18 Additional allocations are needed in the Plan for sites such as North East Redbourn, if it is demonstrated that site B7 (and others) cannot deliver as anticipated.

Policy M7 – Townsend Lane

Q1 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

- 1.19 No comment.

Q2 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

- 1.20 No comment.

Q3 What effect will development have on the Chilterns Beechwoods Special Area of Conservation SAC and how will any adverse impacts on the integrity of the site be avoided and/or mitigated?

- 1.21 No comment.

Q4 Is Policy M7 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

- 1.22 No comment.

Policy M16 – Falconers Field

Q1 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

- 1.23 No comment.

Q2 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

- 1.24 No comment.

Q3 Is Policy M16 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

- 1.25 No comment.

Policy M17 – Land North of Wheathampstead Road

Q1 What is the site boundary based on and is it justified and effective? What is the existing use of the site?

- 1.26
1.27 LIH/LAT Submissions¹ show in the Identified Sites Deliverability Assessment⁷ that site M17 has arboricultural, heritage and capacity constraints.

⁶ Paragraphs 3.98 – 3.108 - LIH Regulation 18 Submission Identified Sites Deliverability Assessment - 25th Sept 23

⁷ Paragraphs 5.162 – 5.172 - LIH Regulation 18 Submission Identified Sites Deliverability Assessment - 25th Sept 23

Q2 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

- 1.28 Several landscape and design considerations have been identified, including:-
- Impacts on the setting and significance of the Granary and Aldwick Manor Grade II Listed building will need to be considered.
 - Significant trees on the southern boundary will be lost to form the vehicular access onto Wheathampstead Road.
 - Significant tree groups within the site compromise development potential, but probably not unit numbers. If trees on the south can be largely retained, the landscape impact is limited.
 - The interrelationship with the golf club access will be a challenge and require very low density.
 - Piggotshill Lane Junction spacing is tight.

Q3 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

- 1.29 Site M17 has various arboricultural, heritage and capacity constraints so it is questionable whether exceptional circumstances exist to justify amending the Green Belt boundary is this location.

Q4 Is Policy M17 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

- 1.30 Additional allocations are needed in the Plan for sites such as North East Redbourn, if it is to be demonstrated that site M17 (and others) cannot deliver as anticipated.

Policy M19 – Piggotshill Lane and UC47 – Crabtree Fields

Q1 What is the existing use of the combined site and what is the reason for having separate allocations?

- 1.31 The relationship of Site M19 to Regulation 18 Site M5 (Sewage Treatment Works, Piggotshill Lane, Harpenden, AL55UN) and UC47 has not been clearly set out in the Regulation 19 Plan (or SADC-ED85A, SADC-ED85B and SADC-ED85C)

- 1.32 LIH/LAT Submissions¹ showed in the Identified Sites Deliverability Assessment⁸ that Site M5 had questionable deliverability potential and we note that Site M5 was removed from the draft Local Plan at Regulation 19 stage. The ability for sites M19 and UC47 (proposed in SADC-ED85B as site M47) to deliver is also unclear.

Q2 Is it clear how the entire site will come forward for development? Is it deliverable?

- 1.33 No.

Q3 What is the extent of the area to be removed from the Green Belt? How does this relate to the land allocated for development?

- 1.34 Site M19's relationship to removed Site M5 and UC47 (proposed in SADC-ED85B as site M47) is unclear, and it's (their) deliverability is questionable in whole or part.

Q4 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

- 1.35 No.

Q5 Can a safe and suitable access to the site be achieved? Is it sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?

- 1.36 Site M19's relationship to removed Site M5 and Site UC47 (proposed in SADC-ED85B as site M47) is unclear socially in respect of proposed access arrangements and suitability.

Q6 Is Policy M19 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

- 1.37 Additional allocations are needed in the Plan for sites such as North East Redbourn, if it is demonstrated that site M19 and UC47 (proposed in SADC-ED85B as site M47) (and others) cannot deliver as anticipated.

Policy M21 – Land at Rothamsted Lodge, Hatching Green

⁸ Paragraphs 5.84 – 5.104 - LIH Regulation 18 Submission Identified Sites Deliverability Assessment - 25th Sept 23

1.38 *Q1 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?*

1.39 The LIH/LAT Submissions¹ show in the Identified Sites Deliverability Assessment⁹ that site M21 is not achievable or deliverable.

Q2 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

1.40 No, Site M21 is not achievable or deliverable.

Q3 Is Policy M21 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

1.41 Additional allocations are needed in the draft Local Plan for sites such as North East Redbourn, if it is demonstrated that site M21 (and others) cannot deliver as anticipated.

Policy M22 – Wood End, Hatching Lane

Q1 What is the site boundary based on and is it justified and effective? What is the existing use of the site?

1.42 No comment.

Q2 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

1.43 No comment.

Q3 Is Policy M22 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

1.44 No comment.

Policy M25 – Wood End, Hatching Lane

Q1 What is the site boundary based on and is it justified and effective? What is the existing use of the site?

1.45 The LIH/LAT Submissions¹ show in the Identified Sites Deliverability Assessment¹⁰ that the access to site M25 is ransomed and unlikely to be achievable without third party land. Part of the site is also in flood zone 3. Further, the site has limited amenities within 800m walking distance.

Q2 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

1.46 No, Site M25 is not considered deliverable.

Q3 How have the risks from flooding been considered as part of the site's allocation, having particular regard to surface water and ground water flooding?

1.47 Site M25 has drainage constraints, and it is questionable whether these have been fully explored in determining the Site's capacity.

Q4 Is Policy M25 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

1.48 Additional allocations are needed in the Plan for sites such as North East Redbourn, if it is demonstrated that site M25 (and others) cannot deliver as anticipated.

Issue 3 – London Colney Site Allocations

Policy B6 – West of London Colney

Q1 What is the site boundary based on and is it justified and effective? What is expected from the site area retained in the Green Belt?

1.49 The LIH/LAT Submissions¹ show in the Identified Sites Deliverability Assessment¹¹ that site B6 is in Flood Zone 3, has TPO and landscape/heritage designation constraints and it is not, therefore, considered to be realistically deliverable in NPPF terms, amongst other things, as it does not have good cycle and walking accessibility credentials.

⁹ Paragraphs 5.173 – 5.176 - LIH Regulation 18 Submission Identified Sites Deliverability Assessment - 25th Sept 23

¹⁰ Paragraphs 5.204 – 5.217 - LIH Regulation 18 Submission Identified Sites Deliverability Assessment - 25th Sept 23

¹¹ Paragraphs 3.87 – 3.97 - LIH Regulation 18 Submission Identified Sites Deliverability Assessment - 25th Sept 23

- 1.50 The proposed allocation lies immediately south of Napsbury Park, which is a Registered Park and Garden, Conservation Area, and area TPO. Taking account of these significant constraints, it is considered there is insufficient land to provide the necessary primary school, care home and residential development assuming a (policy compliant) density of 40dph. No account is taken of all the other necessary facilities and infrastructure required to accommodate the proposed development. Any additional constraints will further erode the ability to deliver the full capacity of the site.

Q2 How will the proposed secondary school be delivered, and what are the reasons for allocating land for the new school in this location?

- 1.51 No comment, for Hertfordshire County Council (HCC) to determine.

Q3 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

- 1.52 This has not been clearly set out.

Q4 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

- 1.53 No, Site B6 is not deliverable potential in whole but certainly in part, to the scale and degree proposed.

Q5 Can a safe and suitable access to the site be achieved? Is it sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?

- 1.54 The LIH/LAT Submissions¹ show in the Identified Sites Deliverability Assessment¹² that site B6 has questionable cycle and pedestrian connections.

Q6 How has the effect of development on the setting of designated heritage assets been considered, having particular regard to the Napsbury Hospital Registered Park and Garden, the Napsbury Park Conservation Area and the All Saints Pastoral Centre?

- 1.55 As detailed above at M713Q1B6.

Q7 Is Policy B6 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

- 1.56 Additional allocations are needed in the draft Local Plan for sites such as North East Redbourn, if it is demonstrated that site B6 (and others) cannot deliver as anticipated.

Policies U2 (Land south west of London Colney Allotments), UC20 (104 High Street) and UC27 (Berkely House)

Q8 Are the 'Urban Settlement' sites within London Colney justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

- 1.57 The LIH/LAT Submissions¹ show in the Identified Sites Deliverability Assessment¹³ Site U2 is not deliverable. Additional allocations are needed in the Plan for sites such as North East Redbourn, if it is demonstrated that site U2 (and others) cannot deliver as anticipated.

Issue 4 – Wheathampstead Site Allocations

Policy M2 – Hill Dyke Road

Q1 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

- 1.58 No comment.

Q2 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

- 1.59 The LIH/LAT Submissions¹ show in the Identified Sites Deliverability Assessment¹⁴ that Site M2 has limited amenities within walking distance.

¹² Paragraphs 3.92 – 3.94 - LIH Regulation 18 Submission Identified Sites Deliverability Assessment - 25th Sept 23

¹³ Paragraphs 7.19 – 7.31 - LIH Regulation 18 Submission Identified Sites Deliverability Assessment - 25th Sept 23

¹⁴ Paragraphs 5.40 – 5.52 LIH Regulation 18 Submission Identified Sites Deliverability Assessment - 25th Sept 23

Q3 How have the effects of development on the setting and significance of the Devil's Dyke and Slad Scheduled Monument been taken into account in the allocation of the site, including any impacts on assets of archaeological significance?

- 1.60 Impacts upon the Scheduled Monument (Wheathampstead earthwork incorporating Devils Dyke and the Slad) should be clearly demonstrated to substantiate the proposed site capacity.

Q4 Is Policy M2 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

- 1.61 Additional allocations are needed in the Plan for sites such as North East Redbourn, if it is demonstrated that site M2 (and others) cannot deliver as anticipated.

Policy M9 – Amwell Top Field

- 1.62 *Q1 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?*

- 1.63 No comment.

Q2 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

- 1.64 LIH/LAT Submissions¹ show in the Identified Sites Deliverability Assessment¹⁵ that site M9 is constrained, requiring third party land for access, that the area of the site is currently within the Landscape Conservation Area and is protected from development. The site's relationship to Wheathampstead also required consideration and has not been evident in the draft allocation.

Q3 How have the effects of development on the setting of the Amwell Conservation Area been taken into account in the allocation of the site?

- 1.65 It is not clear to us that the setting of the Amwell Conservation Area has been fully considered.

Q4 What impact does the pipeline running through the site have on its deliverability for housing, when also considering the need for mitigation in response to Q3 above?

- 1.66 It is considered that this is for StADC to respond to this MIQ.

Q5 How will the site be accessed? Can a safe and suitable access be achieved if Amwell Lane is not to be used?

- 1.67 Access constraints identified in LIH submissions¹⁴ show that access to the site will likely be taken from Amwell Lane which is a narrow one-way working lane of circa 3-3.5m in width from its junction with High Ash Road circa 50m north of the site boundary. There is currently no footway provision along Amwell Lane and therefore the provision of footway improvements in line with the objective/issue identified would likely require third-party land to facilitate these improvements.

- 1.68 With regards to vehicular access and making no allowance for any other dwellings beyond the proposed 60-unit allocation, the HDG would require a Minor Access to be provided as a minimum. Minor accesses allow up to 100 dwellings, have a minimum carriageway width of 4.8m. With regards to footway provision, a minimum width of 1.25m is considered the "*absolute limit*" for speeds below 30mph. In this context, the proposed allocation should provide, as a minimum, an access route from Marquis Lane with a cross section of 6.05m minimum (allowing for the minimum footway and carriageway widths only and excluding the additional width required to enable construction).

- 1.69 Regardless, the provision of a footway at the "absolute limit" width would not be conducive to encouraging walking and is contrary to the hierarchy and approach set out in HCC's LTP4 and in the emerging PMG as well as best practice set out in the CIHT's BPBTBP, resulting in an increased reliance on the private car.

Q6 Is Policy M9 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

- 1.70 Additional allocations are needed in the Plan for sites such as North East Redbourn, if it is demonstrated that site M9 (and others) cannot deliver as anticipated.

¹⁵ Paragraphs 5.122 – 5.137 LIH Regulation 18 Submission Identified Sites Deliverability Assessment - 25th Sept 23

Matter 7 – Residential Site Allocations..... Continued

Hearing Day 13: Wednesday 5 November 2025

Morning Session – -09:30 – 13:00

1) Matter 7 – Residential Site Allocations

Issues: Redbourn and Hemel Hempstead Allocations

Attendance

Deadline 17th October 2025

Issue 5 – Redbourn and Hemel Hempstead Site Allocations

1.71 Policy B3 – West Redbourn

Q1 Is the scale of development proposed appropriate and proportionate to the scale, role and function of Redbourn?

1.72 Redbourn is a sustainable village with a good range of services and facilities.

Q2 Taking into account the need for relevant mitigation and open space, can the site accommodate the number of homes proposed?

1.73 The LIH/LAT Submissions¹ particularly in the Identified Sites Deliverability Assessment¹⁶ show that the southern parcel of site B3 is the subject of a planning application by Vistry (ref 5/2021/3631) for circa 300 dwellings. The application was submitted in 2021, and a decision is still pending some 4 years later.

1.74 The whole site allocation is proposed for 545 dwellings in the Regulation 19 Plan (and SADC-ED85A, SADC-ED85B and SADC-ED85C). Limited progress appears to have been made on the application¹⁷ since submission in 2021 which brings the matter of deliverability to the fore.

1.75 LIH/LAT Submissions¹ show that a significant number of constraints affect the site and its potential capacity, including:

- The need for a suitable buffer for site B3 from the M1 noise and potential air pollution constraints.
- Ability to deliver/provide suitable natural green space (SANG's).
- Need for additional land assembly to deliver the full allocation.
- Potential for Buncefield pipeline constraints.
- Electric pylons.

1.76 We note that SADC-ED85A, SADC-ED85B and SADC-ED85C do not address the fundamental deliverability constraints of this site detailed to date in LIH/LAT Submissions¹.

1.77 From our analysis the current planning application is inadequate in several ways such as, for example, the lack of suitable provision of SANG's. It is also questionable whether the site fits the Vistry partnership delivery model and so it is uncertain as to whether the site can or will be delivered at all.

1.78 Not all the allocation is controlled by Vistry (circa 50%) and it is questionable as to whether and to what extent suitable commercial arrangement have been put in place to collaborate with the other land interests to bring forward the site in a comprehensive manner. The balance of the ownership of the remainder of the site application is understood to be a mix of private land interests.

1.79 It is also significant to note that the current application (ref 5/2021/3631) on part of the site, has been inactive for some time now, having been submitted back in 2021, some 4 years hence.

Q3 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

1.80 It is unclear to us for the reasons stated in the LIH/LAT Submissions¹.

Q4 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

1.81 No, the draft site allocation falls within Green Belt parcels SA-1, SA-3a and SA-3b. They are all assessed as making a strong contribution to the Green Belt purposes. Despite these strong assessed contributions, for

¹⁶ Paragraphs 3.34 – 3.59 LIH Regulation 18 Submission Identified Sites Deliverability Assessment - 25th Sept 23

¹⁷ <https://planningapplications.stalbans.gov.uk/planning/search-applications?civica.query.FullTextSearch=5%2F2021%2F3631#VIEW?RefType=PBDC&KeyNo=121984>

reasons unclear, parcels SA-1 and SA-3a are recommended for further consideration whereas parcel SA-3b is not recommended for further consideration.

Q5 How have the landscape impacts of the allocation been considered, having particular regard to the setting of the Chilterns National Landscape?

1.82 With regards to the National Landscape, it is considered that this is for StADC and the site promoters to justify.

Q6 How have the risks from flooding been considered as part of the site's allocation, having particular regard to fluvial flood risk?

1.83 Redbourn Parish Council representations 1st March 2022 (Appendix 1) indicate that the area to the south of the planning application (ref 5/2021/3631) site floods from underground.

Q7 What effect will development have on the Chilterns Beechwoods SAC and how will any adverse impacts on the integrity of the site be avoided and/or mitigated? Can mitigation be provided on site?

1.84 We question to what degree the delivery of the 11.7ha of SANG's requirements will influence the scale and extent of the site that can be achievably delivered. There is insufficient land to provide the 2FE primary school including early years provision, the minimum quantum of open space and residential development assuming an even density of 40dph.

1.85 No or no sufficient account is taken of all the other necessary facilities, noise mitigation buffer and infrastructure requirements necessary to accommodate the proposed development. Any additional constraints will further erode the ability of the proposed site to deliver the full capacity of the site as proposed in the Plan. The required SANG's provision is particularly significant in this regard. No details have been provided on the approach to the delivery of the site and associated social and natural infrastructure of such a material scale. On the contrary, the North East Redbourn Site, has a SANG scheme approved by Natural England which can offer excess SANG to allocation sites, should any compensation land be needed.

1.86 We also note in Dacorum Borough Council (DBC) representations on the application (26th April 2022) the need for habitat areas (within the Dacorum borough boundary) were highlighted and indicated to be likely to receive an in principle objection "on grounds of requiring land within our Green Belt in order to make the development acceptable, and for which planning permission would need to be sought from DBC".

1.87 DBC continue:

"You will no doubt be aware that the Zone of Influence of the Chiltern Beechwoods Special Area of Conservation (SAC) extends significantly into the SACDC area, thereby covering this site, and that you will not be able to issue any grant of approval until suitable mitigation measures are in place. It is unclear if the proposals will provide any mitigation for the SAC. Equally this will apply to any requirement for planning permission from DBC in connection with the 0.62 ha of land if this is required to support the development of residential units at the this site."

1.88 The application representation (March 2024) from Hertfordshire Couty Council Landscape, highlights that:
"The proposal give rise to adverse landscape and visual effects. The LVIA does state that mitigation will be delivered, importantly 'new planting within the development area' however this is not carried forward robustly enough within the landscape strategy and does not give assurances that this will actually be delivered. It's strongly advised that a more robust network of green infrastructure and structural large-scale planting is required to permeate throughout the development blocks. This should include a distinct hierarchy of genuinely useable streets and public open spaces with a distinct character and function for the community to benefit from (it should not be dominated by SuDS). The acoustic fence requires further landscape and visual mitigation"

1.89 It would therefore appear that there are several fundamental constraints that affect the southern half of the proposed allocation coming forwards and there is a lack of detail about the availability and deliverability of the northern parcel of the proposed draft allocation.

Q8 How have the effects of development on the setting of the Grade I listed Parish Church of St Mary and the Redbourn Conservation Area been taken into account in the allocation of the site?

1.90 The Regulation 19 Plan Policy B3 (bullet 5) (and SADC-ED85B) refer to the need for the site's master planning to resolve harm to heritage assets. There is no suggestion within the evidence base that this important matter has been considered by StADC at the plan making stage.

Q9 Can a safe and suitable access to the site be achieved? Is it sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?

- 1.91 With regards to transport the emerging policy¹⁸ states:
4. Improvements via delivery or contributions to enable direct walking and cycling routes into Redbourn to ensure that walking and cycling are the most attractive methods of travelling into Redbourn.
7. Access to and improvements to the existing Flamsteadbury Park children's play area must be provided."
- 1.92 In addition to the above matters, it is also noted that the southern portion of the site is currently the subject of an outline planning application submitted in 2021 (which remains undetermined) for "*Construction of up to 300 new homes including 35% affordable new homes, new landscaping, public open space and associated infrastructure works*" (Planning application reference 5/2021/3631).
- 1.93 With regards to item 3 of the emerging policy, it is considered that Flamsteadbury Lane and Lydbury Lane both represent considerable constraints to this proposed allocation. Assuming that the circa 600 dwellings included within the allocation are split evenly with 300 south of Flamsteadbury Lane, and the remaining circa 300 north (in line with the current application), this would result in a requirement for accesses to be built to accommodate half the proposed allocation.
- 1.94 Based on HCCs Place and Movement Planning Design Guidance (PMPDG), and LTP4, priority must be given to travel by active and sustainable travel before access by private vehicles. The constraints on the local highway network (Including Falmsteadbury Lane and Lydbury Lane) restricts the ability for this site to provide active and sustainable travel connections that would result in a meaningful shift away from private car use. This is evidenced by the proposed foot/ cycleway connection being proposed, by the current application, which Improves a connection towards the Nickey Line, but with limited Improvements proposed towards Redbourn Village Centre.
- 1.95 Turning to the vehicle access, HCCs PMPDG suggests that a P2/M1 connection should have a minimum width of 5.5m, and as such the scheme would require significant widening of both Falmsteadbury Lane and Lydbury Lane, potentially requiring third-party land.
- 1.96 Based on the submitted Transport Assessment, the Flamsteadbury Lane (between Ben Austins/ North Common and Hemel Hempstead Road) will increase significantly from circa 71 two-way movements¹ to circa 137 two-way movements in the morning peak hour and circa 77 two-way movements² to circa 157 two-way movements in the morning peak hour. This substantial level of increase would undoubtedly result in a detrimental transport impact on West Common.
- 1.97 In addition to the significant vehicular access constraints, the narrow local roads would also prohibit potential necessary accessibility improvements for pedestrians and cyclists. Focusing on the audit undertaken as part of the submitted outline planning application it is noted that whilst Redbourn High Street benefits from a continuous footway, the width is often limited to one metre. The Manual for Streets identifies a minimum footway width of 0.9m for a wheelchair user, 1.2m for a parent and child, and 1.5m for two parents with a pushchair, all of which would require a user to leave the footway to pass. Furthermore, it is noted within the Transport Assessment submitted for the outline application that in the vicinity of the Common, the land on either side of the footway is common land and would therefore potentially create a ransom scenario on any improvements being required on such third-party land.
- 1.98 A review of the proposed draft site allocation has also identified that the walking route from the site boundary to Redbourn High Street is circa 1,200m⁴, considerably above the 800m walkable neighbourhoods walking distance that is typically considered to be best practice. The walking distances identified will inevitably result in an increased reliance on the private car which is directly contrary to the hierarchy and approach set out in HCC's LTP4 and in the emerging PMPDG as well as best practice set out in the CIHT's BPBTBP.
- 1.99 The site is significantly constrained by the noise and air quality impacts from the M1. The Extrium website should only be used as a guide, but it shows approximately 50% of the site to be sitting above the 65dB noise threshold contour emanating from the M1. Given normal design criteria are closer to 50-55dB, the financial, land-take, and aesthetic impacts of mitigation to these levels needs to be considered. In short, such matters could detract from the viability and deliverability of the proposed development to the point it becomes unviable.

Q10 Is Policy B3 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

¹⁸ SADC-ED85B - Reg 19 Local Plan Part B - Main Mods (All modifications)

- 1.100 Additional allocations are needed in the Plan for sites such as North East Redbourn, if it is demonstrated that site B3 (and others) cannot deliver as anticipated.

Policy M6 – Land south of Harpenden Lane

Q1 Is the scale of development proposed appropriate and proportionate to the scale, role and function of Redbourn?

- 1.101 Redbourn is a sustainable village with a good range of services and facilities.

Q2 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

- 1.102 The LIH/LAT Submissions¹ particularly in the Identified Sites Deliverability Assessment¹⁹ show that Site M6 is constrained for several fundamental reasons:
- The site access position is unclear.
 - There are multiple land ownerships.
 - The flood risk, gypsy and traveller site and TPOs.

- 1.103 The Gypsy and Travellers site appears to be included within the proposed draft site allocation so it is unclear if vacant possession can be secured. There also appear to be multiple land titles on the site, and it is unclear to what extent these different ownerships have been assimilated and/or a collaboration framework is in place. As such, it is unclear whether the site can be delivered even if the technical constraints can be overcome

Q3 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

- 1.104 No.

Q4 Can a safe and suitable access to the site be achieved? Is it sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?

- 1.105 Regulation 19 Plan Policy M6 (Part B) and SADC-ED85A indicates that safe access avoiding the A5183 are required. SADC-ED85B also requires the "Delivery of / Contribution to the provision of essential transport infrastructure, including mitigating the impact of traffic associated with the development, and appropriate consideration of M1 Junction 9 interchange."

- 1.106 With regards to transport matters, the key development objectives/ issues to address as set out in the draft allocation in Appendix A of SCDC's DLP (July 2023) are:

*"2. Proposals must demonstrate how the site will be accessed effectively from Redbourn safely for pedestrians and cyclists without the need for direct access to the A5183.
3. Contributions / enhancements to support relevant schemes in the LCWIP and GTPs as indicated in the TIA ..
4. Active mode access to the Nickey Line, and support for its enhancement, will be required.
5. Support for enhanced connectivity of the Nickey Line into Redbourn and onwards to Harpenden would be welcomed, including improvements to access / crossings and to surfacing / lighting where appropriate. This should be considered in line with GTP / LCWIP schemes, and the Nickey Line Greenspace Action Plan."*

- 1.107 Access to the site is currently taken from High Street and the A5183, however as noted above vehicular access to any development coming forward on the site cannot be brought forward from the A5183. Access from Harpenden Lane to the north is unlikely to be possible due to the frontage's proximity to the existing roundabout, and therefore vehicular access to the site would need to be taken from the High Street.

- 1.108 Given that the existing bridges over the River Ver in the vicinity of the High Street access would present a visibility constraint it is likely that new bridges would be required to ensure that appropriate splays could be provided. The provision of a new bridge would represent a considerable constraint and cost to a scheme of circa 68 dwellings and would likely have significant viability implications for the scheme.

Q5 How have the risks from flooding been considered as part of the site's allocation, having particular regard to fluvial flood risk?

- 1.109 The Regulation 19 Policy M6 (Part B) indicates "approximately half of the site is in Flood Zone 3" and that "There must be no residential development outside Flood Zone 1 and the Exception Test is required for this site

¹⁹ Paragraphs 5.105 – 5.115 LIH Regulation 18 Submission Identified Sites Deliverability Assessment - 25th Sept 23

because there is significant fluvial flood risk within all flood zones at the eastern side of the site and the development type is 'vulnerable'."

1.110 Several landscape and design considerations are identified. These are:

- The site allocation overlaps with a gypsy sand traveller site.
- Flood Zone 3 in centre of site and TPOs to southern end.
- 1.3ha SANG is required from 68 dwellings which would need to be accommodated.

Q6 What effect will development have on the Chilterns Beechwoods SAC and how will any adverse impacts on the integrity of the site be avoided and/or mitigated? Can mitigation be provided on site?

1.111 Regulation 19 Plan Policy M6 (Part B) bullet 9 refers to SANG /SAMMS on site or elsewhere. The North East Redbourn Site, has a SANG scheme approved by Natural England which can offer excess SANG to allocation sites, should any compensation land be needed.

Q7 Is Policy M6 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

1.112 Additional allocations are needed in the Plan as site M6 cannot deliver as anticipated.

Policy P3 – Friends Meeting House, Blackwater Lane, Hemel Hempstead

Q1 What is the justification for not seeking to amend the Green Belt boundary in this location? Can the allocation be deliverable whilst retained in the Green Belt? Is the allocation effective?

1.113 No comment.

Q2 What effect will development have on the Chilterns Beechwoods SAC and how will any adverse impacts on the integrity of the site be avoided and/or mitigated? Can mitigation be provided on site?

1.114 No comment.

Q3 Is Policy P3 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

1.115 No comment.

Matter 7 – Residential Site Allocations..... Continued

Issue 6 – Bricket Wood Site Allocations

Hearing Day 13: Wednesday 5 November 2025

Morning Session – -09:30 – 13:00

1) Matter 7 – Residential Site Allocations

Issue: Bricket Wood Site Allocations

Written Only – No Attendance

Deadline 17th October 2025

Policy M4/OS1 – North of Oakwood Road

Q1 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

- 1.116 The LIH/LAT Submissions¹ show in the Identified Sites Deliverability Assessment²⁰ that site(s) M4/OS1 is barely large enough to provide the number of dwellings proposed. No account is taken of all other facilities and infrastructure. Any additional constraints will erode further the ability to deliver the full capacity of the site.

Q2 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

- 1.117 The LIH/LAT Submissions¹ show in the Identified Sites Deliverability Assessment¹⁵ that the Site access is questionable and may not be acceptable to the Local Highways Authority, due to the physical ability to deliver the site access with sufficient visibility.

Q3 What is the justification for separate allocations, rather than a single site covering M4 and OS1? Is it sufficiently clear what is required by Policy M4(1) which refers to co-ordination between the two sites?

- 1.118 It is unclear how the combined site operates or interacts within the plan and why sites M4 and OS1 have been allocated separately. This is not addressed in SADC-ED85A, SADC-ED85B and SADC-ED85C.

Q4 Can a safe and suitable access to the site be achieved? Is it sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?

- 1.119 The LIH/LAT Submissions¹ show in the Identified Sites Deliverability Assessment¹⁵ with regards to transport, the key development objectives/issues to be addressed set out in the draft allocation are:

"1. [now 2] Proposals must demonstrate suitable and safe access to residential areas to the south and not rely on pedestrians walking and cycling along the currently narrow path along the side of the North Orbital road."

- 1.120 Access onto the A405 is required which is a dual carriageway subject to a 50mph speed limit and forms part of Hertfordshire County Council (HCC)'s strategic network. It is noted that Policy 5 of LTP4 states that *"Only consider new accesses onto primary and main distributor roads where special circumstances can be demonstrated in favour of the proposals"* Item (f) of Policy 5 of HCC's LTP4 (2018). In this context, it is considered that access to the site may not be acceptable to the Local Highway Authority in principle, regardless of its deliverability.

- 1.121 The A405 is currently subject to a 50mph speed limit across the site frontage and therefore any access would be required to provide visibility splays of 160m or reduce the speed limit on the strategic road network. Additionally, the A405 in this location provides a key (and the only) link between the M25 and the M1 and therefore provides a strategic function beyond the countywide function of the wider A405.

- 1.122 With regards to pedestrian infrastructure, a narrow footway is currently provided on the eastern side of the A405. This would need to be widened to allow for the provision of a cycle link to align with best practice and the policy objectives in LTP4. To achieve this the existing bus stop provided in a lay-by within the left turn lane for Oakwood Road would be required to be removed or relocated resulting in a reduction in access to bus services for existing residents.

- 1.123 It is unclear in policy M4 (SADC-ED85B) how such matters will be addressed.

²⁰ Paragraphs 5.68 – 5.83 LIH Regulation 18 Submission Identified Sites Deliverability Assessment - 25th Sept 23

Q5 Are Policies M4/OS1 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

- 1.124 Additional allocations are needed in the Plan for sites such as North East Redbourn, if it is demonstrated that site M4/OS1 (and others) cannot deliver as anticipated.

Policy M15 – Bucknalls Drive

Q1 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

- 1.125 No comment.

Q2 Is Policy M15 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

- 1.126 No comment.

Policy M23 – Ashdale Lye Lane

Q1 What is the current use of the site and is it available for development within the plan period?

- 1.127 The LIH/LAT Submissions¹ show in the Identified Sites Deliverability Assessment²¹ that site M23 is almost entirely covered with woodland TPO 0571, Priority Habitat Woodland. Pylons running through western part of site. The site is not suitable for development in arboricultural terms.

- 1.128 The eastern half of the proposed allocation is covered by group TPO 0571, effectively removing, the potentially developable area unless the trees could all be replaced. It is unclear how the site could achieve the necessary biodiversity net gain. No account is taken of all other facilities and infrastructure necessary to accommodate the development. Any additional constraints will erode further the ability to deliver the full capacity of the site.

Q2 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

- 1.129 The site is not suitable for development.

Q3 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

- 1.130 No for the reasons stated at M716Q1M23.

Q4 Is Policy M23 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

- 1.131 Additional allocations are needed in the Plan for sites such as North East Redbourn, if it is demonstrated that site M23 (and others) cannot deliver as anticipated.

Issue 7 – How Wood Site Allocations

Policy L1 – Burstn Nurseries

Q1 What is the site boundary based on and is it justified and effective?

- 1.132 LIH/LAT Submissions¹ show in the Identified Sites Deliverability Assessment²² that site L1's capacity does not appear to be fully informed by a robust assessment of heritage or transport constraints as well as the relationship of development to the existing land uses on site.

Q2 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

- 1.133 No comment.

Q3 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

- 1.134 No comment.

²¹ Paragraphs 5.177 – 5.188 LIH Regulation 18 Submission Identified Sites Deliverability Assessment - 25th Sept 23

²² Paragraphs 4.3 – 4.18 LIH Regulation 18 Submission Identified Sites Deliverability Assessment - 25th Sept 23

Q4 How have the mix of uses been established and how will development proposals come forward in a coordinated and coherent manner, taking into account any existing planning permissions on the site?

1.135 No for the reasons stated at M7I7Q1L1.

Q5 How has the effect of development on the setting of designated heritage assets been considered, having particular regard to the Grade II listed Burston Manor House?*

1.136 Not sufficiently, for the reasons stated at M7I7Q1L1.

Q6 Is Policy L1 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

1.137 Additional allocations are needed in the Plan for sites such as North East Redbourn, if it is demonstrated that site L1 (and others) cannot deliver as anticipated.

Policy M10 – Tippetdell Lane and Orchard Drive

Q1 What is the current use of the site and is it available for development within the plan period?

1.138 No comment.

Q2 Is it sufficiently clear what is required of development proposals under Policy M10(1)?

1.139 No comment.

Q3 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

1.140 No comment.

Q4 Is Policy M10 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

1.141 No comment.

Matter 7 – Residential Site Allocations..... Continued

Issue 8 – Chiswell Green Site Allocations

WEEK 4

Hearing Day 13: Thursday 6 November 2025

Morning Session – -09:30 – 13:00

1) Matter 7 – Residential Site Allocations

Issues: Chiswell Green, Park Street, Colney Heath and Radlett Allocations

Written Only – No Attendance

Deadline 17th October 2025

Policy L3 - East and West of Miriam Lane

Q1 What is the current use of the site and is it available for development within the plan period?

1.142 No comment.

Q2 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

1.143 No comment.

Q3 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

1.144 No comment.

Q4 Is Policy L3 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

1.145 No comment.

1.146 Policy U4 – Greenwood United Reformed Church

Q1 What is the existing use of the site and is it developable within the plan period?

1.147 The LIH/LAT Submissions¹ particularly in the Identified Sites Deliverability Assessment²³ show that once access has been provided, the site will have a reduced capacity. The retention of the existing use onsite is also unclear.

Q2 Is Policy U4 justified, effective and consistent with national planning policy?

1.148 No.

Policy UC25 – Watford Road, Chiswell Green

Q1 What is the existing use of the site and is it developable within the plan period?

1.149 No comment.

Q2 Is Policy UC25 justified, effective and consistent with national planning policy?

1.150 No comment.

Issue 9 – Park Street Site Allocations

Policy L2 – West of Watling Street

Q1 What is the latest position regarding the development proposals for the site?

1.151 The LIH/LAT Submissions¹ particularly in the Identified Sites Deliverability Assessment²⁴ show the site has the benefit of planning permission (ref 5/2022/0267) for 95 dwellings as granted at appeal (ref APP/B1930/W/24/3343986) on the 8th November 2024.

Q2 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

1.152 No comment.

²³ Paragraphs 6.33 – 7.47 LIH Regulation 18 Submission Identified Sites Deliverability Assessment - 25th Sept 23

²⁴ Paragraphs 4.19 – 4.32 LIH Regulation 18 Submission Identified Sites Deliverability Assessment - 25th Sept 23

Q3 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

1.153 No comment.

Q4 Is Policy L2 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

1.154 No comment.

Issue 10 – Colney Heath and Radlett Site Allocations

Policy M13 – North of Boissy Close, Colney Heath

Q1 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

1.155 No comment.

Q2 Can a safe and suitable access to the site be achieved? Is it sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?

1.156 No comment.

Q3 Is Policy M13 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

1.157 No comment.

Policy P1 – Smallford Works, Colney Heath

Q1 What is the existing use of the site and is it developable within the plan period?

1.158 The LIH/LAT Submissions¹ show in the Identified Sites Deliverability Assessment²⁵ that site P1 has landownership, viability, and land use constraints. We note that SADC-ED85A, SADC-ED85B and SADC-ED85C indicate that this site should be removed from the Plan.

Q2 What is the justification for not seeking to amend the Green Belt boundary in this location? Can the allocation be deliverable whilst retained in the Green Belt? Is the allocation effective?

1.159 It is unclear if the existing operations and landowners/tenants on the site which are to vacate the property. The site has limited amenities within walking distance. We note that SADC-ED85A, SADC-ED85B and SADC-ED85C indicate that this site should be removed from the Plan.

Q3 Is Policy P1 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

1.160 We note that SADC-ED85A, SADC-ED85B and SADC-ED85C indicate that this site should be removed from the draft Local Plan. Additional allocations are needed in the draft Local Plan for sites such as North East Redbourn, if it is demonstrated that site P1 (and others) cannot deliver as anticipated.

Policy B8 Harper Lane, Radlett

Q1 What is the existing use of the site and is it developable within the plan period?

1.161 LIH/LAT Submissions¹ show in the Identified Sites Deliverability Assessment²⁶ that the site is significantly constrained not least, in summary, due to the following factors:

- Harper Lane and the Listed Building adjacent the site.
- One-way working bridge over the railway line which forms part of the signal-controlled junction of Watling
- Street and Harper Lane adjacent to the site will form a key constraint.
- Site access is potentially ransomed.
- Delivering the access constraints has costs, ransom risks, and scheme viability implications; and
- Unclear if the landownership position is fully reconciled and/or there is any collaboration agreement in place
- between the different land interests

Q2 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

²⁵ Paragraphs 6.1– 6.15 LIH Regulation 18 Submission Identified Sites Deliverability Assessment - 25th Sept 23

²⁶ Paragraphs 3.109– 3.125 LIH Regulation 18 Submission Identified Sites Deliverability Assessment - 25th Sept 23

1.162 No comment.

Q3 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

1.163 No, site B8 is significantly constraint in highways and access terms.

Q4 How has the location of development been considered as part of the site allocation process, having particular regard to proximity of the railway line and existing commercial uses?

1.164 See comments at M7I10Q18.

Q5 Can a safe and suitable access to the site be achieved? Is it sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?

1.165 See comments at M7I10Q18.

Q6 Is Policy B8 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

1.166 Additional allocations are needed in the Plan for sites such as North East Redbourn, if it is demonstrated that site B8 (and others) cannot deliver as anticipated.

Appendix 1

Web Comment Data Form Entry for Planning Ref: 5/2021/3631

Vicky Kidd (deputy clerk)

Redbourn Parish Centre
The Park
Redbourn
Herts
AL3 7LR

Redbourn Parish Council objects to this planning application.

The harm to the openness of the greenbelt to the west of the village of Redbourn would be significant and outweigh any benefits to the community.

The proposed access is via Flamsteadbury Lane and Mansdale Road which are not suitable roads for an increase in traffic.

There are other environmental issues too: The area at the south is prone to flooding; The River Red (a chalk stream) flows underground from this area before emerging nearby on Redbourn Common; Noise from the M1 would be considerable; The site is traversed by overhead electricity pylons and underground high pressure oil pipelines.

All of these factors make it an unsuitable site for a major development in Redbourn. In our Redbourn Neighbourhood Plan process, we considered potential development sites around the village and this site was rejected because of its location.

The planning application contravenes the following policies in the 1994 District Local Plan:

Policy 1, Greenbelt (and also chapter 13 of the NPPF)

Policy 34, Highways Considerations

Policy 83, Impact of Road Traffic Noise on Housing

Policy 84, Flooding and River Catchment Management

Object to Proposal

London

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E: info@urbanissta.co.uk

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Birmingham

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