

St Albans City and District Local Plan Issue 5 – Policy B3 West Redbourn Land at Gaddesden Lane

Vistry Group

October 2025

Vistry Group

**Bovis
Homes**



**COUNTRYSIDE
Homes**



**Linden
HOMES**

Turley
Planning

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Client

Vistry Group

Our reference

BOVC 3000 SK

October 2025

1. Responses to Issue 5 - Redbourn and Hemel Hempstead Site Allocations

Introduction

- 1.1 This Hearing Statement has been produced by Turley on behalf of Vistry Group (Vistry) who have a significant land interest in the southern area of the Broad Allocation (B3) West Redbourn, south of Flamsteadbury Lane (see preceding page).
- 1.2 The comments made in this Statement directly respond to the questions raised by the Inspector and should be read in conjunction with our Regulation 19 representations. The Inspector's attention is also drawn to the fact that Vistry have a live, outline planning application for 300 new homes awaiting determination by St Albans Council (submitted in December 2021). Therefore many of the comments in this Statement draw upon the technical information produced in support of the current outline application.

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

- 1.3 Yes. The scale of development proposed to the west of Redbourn is proportionate to the scale, role and existing function of Redbourn. In terms of the appropriateness of the scale of the allocation, the linear nature of the B3 allocation makes optimum use of the existing hinterland between the western settlement edge and the M1 corridor.
- 1.4 This area of highly contained Green Belt does not contribute strongly to any wider Green Belt purposes and so is not strongly perceived as open countryside, due to the elevated boundaries of the M1 corridor and visible electricity pylons, which collectively constrain any open countryside views further west.
- 1.5 In terms of role and function, Redbourn is a Tier 4, large village, in the current settlement hierarchy and benefits from a good range of local services and facilities, most of which are found in the high street. According to the 2021 Census, Redbourn has a population of 5,450 persons, and the proposed scale of development at West Redbourn would add around 1,200 additional people to the 2021 baseline population figure.
- 1.6 This equates to an uplift in population to around 6,650 persons during the new plan period to 2041, of which the percentage of new B3 residents in the expanded overall settlement would be 18%. This additional scale of population and resultant increased local footfall in the high street will however assist in providing greater critical mass and improved overall long-term vitality and viability for Redbourn.

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

- 1.7 Yes. Taking into account the need for relevant mitigation and public open space, the overall site can reasonably accommodate the number of new homes proposed.

- 1.8 This is evidenced in that at 27 hectares gross, only around 50% of the site area is required to accommodate the quantum of new development at the Council's preferred minimum density of 40 dwellings per hectare in the emerging Local Plan (Policy LG1). This leaves circa 13 hectares available for use as public open space and other mitigation.
- 1.9 The above illustrative masterplan also shows that 300 new homes can be comfortably accommodated on Vistry's southern site in isolation, whilst still meeting the Council's minimum density and open space requirements. However, with regard to the need for SANG mitigation, a suitable, nearby, off-site solution has been fully secured by Vistry, which is discussed further in context below.

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?

- 1.10 This is primarily for the Council to answer, but our response at paragraph 1.2 above is pertinent to this question. The topographical nature and permanence of the elevated M1 corridor in this location, demonstrates that the new Green Belt boundary is clearly defined, using physical features that are readily recognisable and likely to be permanent.

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

- 1.11 This question is also primarily for the Council to answer, but we consider that exceptional circumstances do exist to justify amending the Green Belt boundary in this location, having regard to the evidence base of the emerging Local Plan and the physical characteristics of the B3 allocation site.
- 1.12 At the site-specific level of the outline application, illustrated above, the Site makes little or no contribution to the purposes a) b) or d) of the Green Belt, as set out in the NPPF. Assessed in isolation, the Site makes little or no contribution towards checking urban sprawl, preventing the merging of settlements, safeguarding the countryside, preserving historic settings or maintaining important gaps.
- 1.13 This is corroborated by the 2023 ARUP Stage 2 Green Belt Review, which forms part of the evidence base for the new Local Plan. This is also reflected in the site-specific Green Belt assessment submitted by Vistry, as part of the current application, that confirms that the sub-area immediately to the west of Redbourn, contained by the M1 corridor, is judged to contribute very little to the maintenance of the wider Green Belt.
- 1.14 The combination of very high levels of unmet housing need (demonstrated by a current five year housing land supply of only 0.9 years) a revised Local Housing Need calculation materially higher than the requirement upon which the Draft Local Plan is based, a low performing area of Green Belt, and a lack of viable local alternatives, therefore justifies amending the Green Belt in this location.

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

- 1.15 A Landscape and Visual Appraisal (LVIA) has been undertaken by CSA Environmental and has been submitted in support of the Vistry planning application. The conclusions of the LVIA in terms of landscape impact can be broadly summarised as follows:
- 1.16 The Site is assessed in the LVIA as being of an overall medium landscape value and medium - low landscape quality and sensitivity. This assessment is based on its very close proximity to the M1, which physically and visually separates it from the countryside, together with the close relationship of the Site to the existing built edge of Redbourn and its lack of distinctive landscape features.
- 1.17 The LVIA identifies that views of the Site are generally restricted to areas that are close by the Site. The M1 embankment to the immediate west of the Site also screens most of the views to the west. In addition, the combination of the adjacent settlement and undulating landscape, with generally high levels of vegetation, means that most views from further afield are also screened. This is suitably illustrated in the photo extract below, which is the view from the pedestrian bridge over the M1 at Flamsteadbury Lane, looking south towards the western boundary of the Site.



- 1.18 The LVIA identifies that close range views of the Site are possible from a number of nearby properties which border the Site, and from public rights of way which cross it. The LVIA notes that the Development Framework Plan shows how the Site could be developed and illustrates how the majority of existing landscape features on Site can be retained within the development proposals. These include most of the established hedgerows and hedgerow trees on the Site and the Development Framework Plan illustrates how new structural planting will strengthen the Site's existing boundaries.

- 1.19 The LVIA notes that this will include new tree planting within the development area to provide additional tree canopies to filter and screen views from the surrounding area. Views of the proposed development will hence be restricted to areas close by to the Site.
- 1.20 Those receptors which would experience the greatest degree of change are users of the footpaths which cross through the Site's central and northern areas where the new properties would be located. There would also be views from the adjacent residential properties to the east and south of the Site. Structural planting is proposed to reinforce the Site's existing boundaries, providing further screening as it matures.
- 1.21 The LVIA concludes that given the Site's relationship to existing built form and the M1 containing it from the surrounding countryside, it is capable of accommodating housing development in line with that shown on the Development Framework Plan, without resulting in any material harm to the surrounding countryside's landscape and visual character. Accordingly, the landscape impacts of the current Vistry proposals would have no harmful impact upon the setting of the Chilterns National Landscape further west.

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

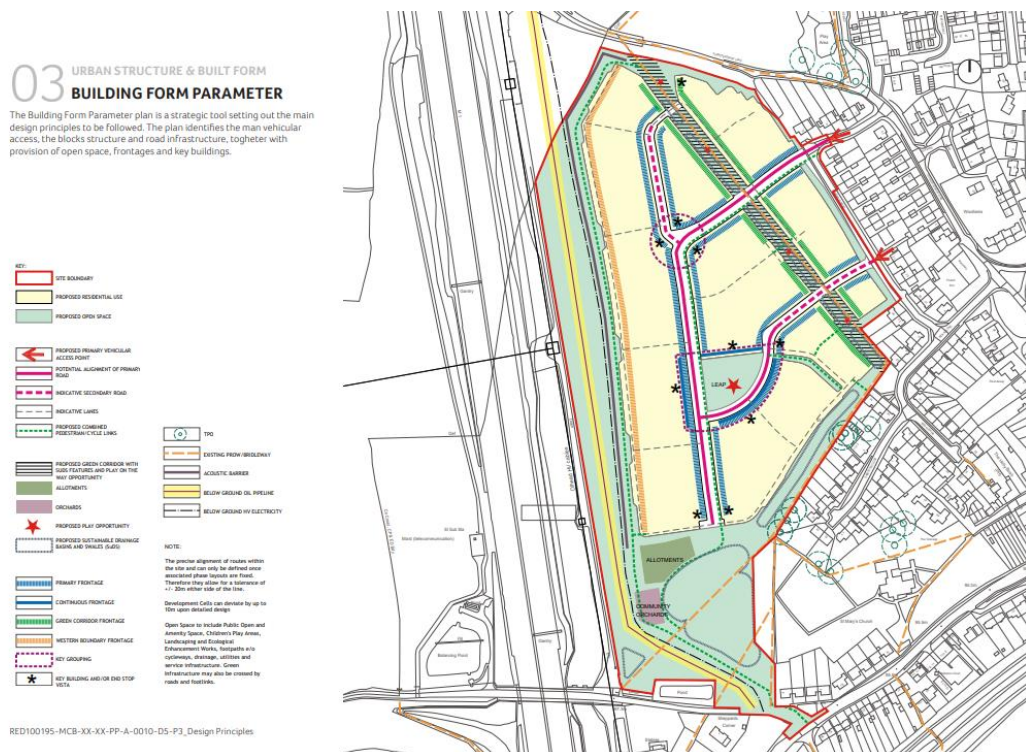
- 1.22 As part of the supporting documentation for Vistry's current planning application a Flood Risk Assessment (FRA) has been prepared by Rappor. This assessment has considered the risks of all types of flooding to the Site including tidal, fluvial, surface, groundwater, sewer and artificial sources and provided mitigation measures to ensure that the flood risk to the site is minimised and that flood risk off-site is not increased.
- 1.23 Principally, the site is located within Flood Zone 1 as shown on the Environment Agency Flood Map for Planning and so is at low risk of tidal, fluvial, groundwater and sewer flooding, however, the Site is at increased risk of surface water and reservoir flooding. The proposed development on the Vistry site therefore takes a sequential approach to development and so there is no built form proposed by the application in the areas considered to be at risk of surface water and reservoir flooding.
- 1.24 The principle of all forms of development in Flood Zone 1 locations is considered to be acceptable by the FRA. Surface water runoff from the development is to be directed to an attenuation basin sufficiently sized for the 1% AEP event with 40% climate change allowance, prior to a proposed outfall to the Thames Water asset. A safe pedestrian access is also available east onto Mansdale Road and Flamsteadbury Lane.
- 1.25 The FRA however recommends that finished floor levels should be set a minimum of 300mm above the proposed ground levels to provide protection against flooding from any surface water runoff.
- 1.26 In compliance with the requirements of the National Planning Policy Framework, and subject to the mitigation measures proposed, the FRA concludes that development will therefore not cause, or be subject to, any significant flood risk issues.

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?

- 1.27 Following the submission of the Vistry's outline planning application in December 2021, Vistry was notified by the Council that the Site fell within the expanded catchment of the Chiltern Beechwoods Special Area of Conservation (CBSAC). Consequently, the Council indicated that to mitigate the recreational impact on the CBSAC, Suitable Alternative Natural Greenspace (SANG) would need to be provided as part of the application.
- 1.28 Given the constraints of the application site area, it was determined at an early stage that an off-site solution would be required. Vistry therefore located a suitable SANG site close to the current application site, comprising 16 hectares, with a new visitor car park, utilising surplus agricultural land. The site is located approximately two kilometres to the west of the application site, and can be easily accessed from Gaddesden Lane.
- 1.29 This SANG site is located within Dacorum Borough (the M1 demarcates the boundary between the two LPA's) and so a separate change of use application was submitted to Dacorum Borough Council (DBC) in 2024.
- 1.30 The SANG application was submitted following full engagement with Natural England and other stakeholders, to ensure that the general location, quality and accessibility of the proposed SANG were all fully acceptable. It was upon this firm basis that the SANG planning application was submitted to DBC and officers recommended to Members that planning permission for the SANG should be granted.
- 1.31 The SANG application was subsequently refused by DBC Members at Committee in April 2025, and Vistry appealed the decision to the Secretary of State. This appeal was allowed on 30th September 2025 and the decision is provided at **Appendix 1** of this Statement.
- 1.32 In allowing the SANG appeal, the Inspector concluded that the proposed development would be an attractive alternative natural green space, in a suitable location, meeting the guidance for SANG set out by Natural England and the relevant criteria within the CBSAC Mitigation Strategy. The Inspector also concluded that the SANG location would intercept visitors who may otherwise travel to the SAC at Ashridge Commons and Woods from developments within the 4km catchment area of the SANG.
- 1.33 Accordingly, after considering all the issues raised, the Inspector found that the SANG would contribute towards mitigating the adverse recreational pressure impacts at the CBSAC and was satisfied that a likely significant effect of the proposal on the designated site could be ruled out. There was accordingly no requirement for the Inspector to undertake an appropriate assessment in relation to the effect of granting permission for the SANG on the integrity of the CBSAC.
- 1.34 This Appeal decision provided at Appendix 1 demonstrates that in relation to the site area controlled by Vistry in the southern part of the Broad Location, full and appropriate mitigation for the CBSAC has already been secured.

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?

- 1.35 A Heritage Assessment (HA) has been undertaken and submitted in support of the Vistry planning application. The HA notes that the Site is located proximate to two Areas of Archaeological Significance, identified on the HER (and in the Local Plan), associated with historic settlement at Church End to the east of the Site and The Aubreys scheduled monument to the west.
- 1.36 The HA identifies that the Site is located c. 20m west of Redbourn Conservation Area and c. 120m west of the Grade I listed Church of St Mary. The current proposals minimise harm to designated heritage assets through the provision of open space within the southern area of the Site, so as to retain the open character of land immediately west of Redbourn Conservation Area and the Grade I listed Church of St Mary.
- 1.37 With this in place, the HA anticipates that any harm to the Grade I listed Church of St Mary would be less than substantial. The HA notes importantly that this would also be at the lowermost end of this harm spectrum and any harm to Redbourn Conservation Area as a whole would be negligible, which is to say less than substantial harm and at the very lowermost end.
- 1.38 The Application proposals would have a very limited effect on the Site's current situation by reason of specific exclusion of built development in the vicinity of the heritage asset. It is concluded therefore by the HA that the Vistry proposals would not result in any harm to the setting or significance of the heritage asset with the design parameters shown.



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?

- 1.39 A Transport Assessment (TA) and Residential Travel Plan has been prepared by Pegasus Transport to support the current Vistry application which considers the traffic impact of the submitted development proposals on the adjacent highway network.
- 1.40 The TA notes that the local area offers good everyday services including a primary school (Redbourn Primary), a special educational needs school (St Luke's), a leisure centre, convenience stores, a Post Office, restaurants and cafes, a health centre and a dentist. The TA notes that Redbourn High Street includes additional shops, eateries and a vet. The Vistry site is located within walking and cycling distance of existing services and amenities that are typically required by future residents on a daily basis.
- 1.41 In terms of access, the development proposed by Vistry will be served from two new points of access from Mansdale Road, as shown in the image above and in more detail at **Appendix 2** of this Statement. To the north, the existing Mansdale Road carriageway will be subject to a minor realignment with the existing north-south section forming the minor arm of a new priority junction. Another junction on Mansdale Road will be provided around 115 metres to the south, opposite and between 19 and 21 Mansdale Road. In line with HCC's Design Guide, this will provide a 5.5-metre-wide carriageway and two-metre-wide footways on both sides.
- 1.42 The TA concludes that the proposed development is broadly in accordance with the transport policies of local and national government. It also concludes that the Site is suitably located and that appropriate measures are proposed to ensure that there are opportunities for travel without reliance on single occupancy car travel. Trips associated with the proposed scheme can be accommodated on the local highway network and that operational and safety issues are addressed. As such, there are no transportation-related reasons why the current development proposal should not be granted permission.

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

- 1.43 As set out in our Regulation 19 Submissions, Vistry strongly supports Policy B3 in its overall construct and development intentions, but however finds two specific elements of the overall B3 policy unsound, one of which, is a recent major modification (self-contained housing with care units) upon which we have not been able to previously comment. Vistry therefore seeks modification of Policy B3 for the two following reasons:
- 1.44 With regard to the self-contained housing with care units, the recent main modification requires 70-80 of the overall number of new homes to meet these specifications, which represents nearly 15% of the overall dwelling quota and reduces the remaining dwelling yield to only **465** new homes. This also has a bearing on the educational requirement, as discussed below, as such specialist units are not counted in terms of assessing pupil yield.

- 1.45 Vistry's principal concern in this regard is there is no tangible evidence to justify this level of specialist care provision for an overall scheme of this size. The combination of up to 80 new housing with care units, plus a minimum of 40% affordable housing, also means that the market housing available reduces to only 279 units across the whole site.
- 1.46 The modification sought by Vistry is therefore for this recent modification to be removed in its entirety and replaced with a more general wording, which aligns with the following:
- A proportion of new homes, delivered as self-contained housing with care units, will be encouraged, the details of which, are to be agreed at the application stage.*
- 1.47 With regard to new education infrastructure, Policy B3 requires the allocation site to provide a site and contributions for a new 2FE primary school. However on the basis of the anticipated pupil yield from the scheme and the surplus capacity currently available, there is no evidence to justify this requirement.
- 1.48 Primarily, on the basis that the B3 allocation has a maximum pupil-bearing yield of only **465** new homes, the requirement for a new Primary School site would have a land take equivalent to the loss of a further 80 new homes (based on a 2 hectare site and the loss of homes at 40 dwellings per hectare). Therefore the total number of new homes on the site, actually generating pupils, would be only 385 family dwellings.
- 1.49 In terms of pupil yield, based on Hertfordshire County Council's Tier 2 of 1FE per 500 dwellings, a need would arise for up to 0.77FE (or 0.93FE if no land is lost). In comparison current forecasts for Redbourn Primary School indicate that there are surplus places available equivalent to 1.2FE. Furthermore, the scale of the freehold site at Redbourn Primary School suggests that expansion to 3FE is feasible in the future, in the event that it was ever needed, but for the avoidance of doubt, there is no immediate need arising from the development of the B3 allocation site.
- 1.50 Accordingly, we consider that this prescriptive element of Policy B3 is not justified and so should be deleted in favour of proportionate, evidenced-based contributions towards new educational infrastructure, as part of the S106 obligations at the application stage, should a justifiable need be identified, which accords with the CIL Regulations. Vistry also reserves the right to bring further corroborating evidence to the hearing, as required.

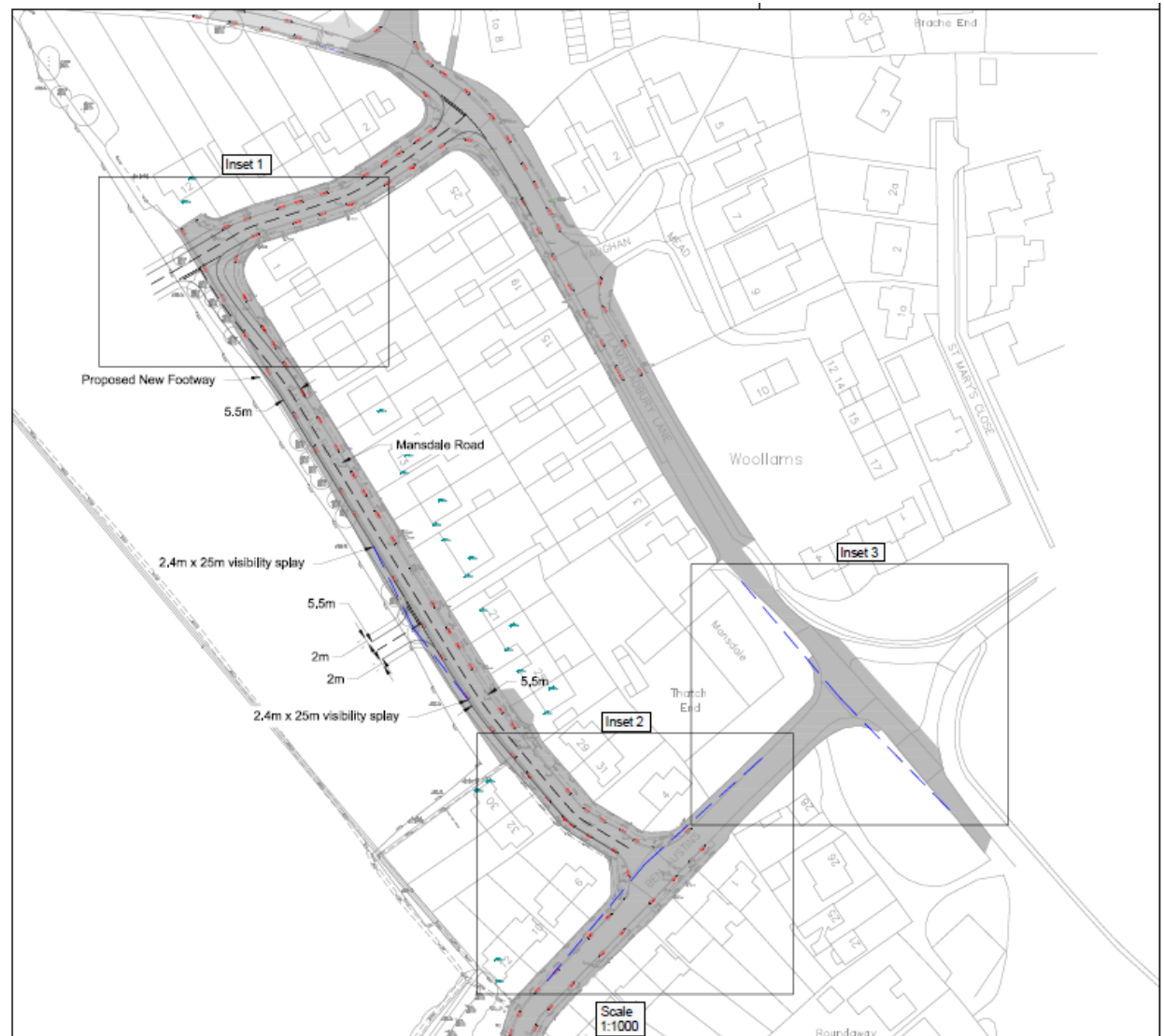
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Appendix 1

SANG Appeal Decision - Land at Green Lane

Appendix 2

Land North of Gaddesden Lane, Redbourn Proposed Access Arrangements via Mansdale Road



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