

Redbourn Parish Council
Matter 11 – The Natural Environment

Issue 1 – The Green Belt – Policies LG5 – LG9

- Q1 Are any alterations proposed to the Green Belt boundary which do not form part of the site allocations under Matter 7? If so, what are the exceptional circumstances which justify the alterations proposed?**

RPC Response:

We are not aware of standalone boundary alterations in Redbourn outside the allocations considered under Matter 7.

- Q2 What is the rationale for Policy LG5 criterion a) and b), given that the overarching approach is to consider development proposals in the Green Belt against national planning policy?**

RPC Response:

LG5 correctly states that proposals will be assessed in accordance with national policy, then adds two supportive hooks. However, if the policy text/justification anchors (b) to the NPPF tests of not inappropriate development or very special circumstances, the clause is workable.

- Q3 Is Policy LG6 (and the Plan when read as a whole) consistent with paragraph 47 of the Framework, which states that plans should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements?**

RPC Response:

RPC's concern is that the Plan largely defers the where/what to application stage, rather than presenting an area-based concept or priority map for compensatory works. We therefore support LG6 but ask the Council to publish an indicative districtwide schedule/map of candidate compensatory projects (to be updated via AMR), so that obligations for sites like site allocation at West Redbourn (B3) are targeted, additive and monitorable.

- Q4 What is expected from development proposals on the smaller site allocations released from the Green Belt in Part B of the Plan? How will development proposals be expected to meet the requirements in Policy LG6?**

RPC Response:

This is a question for SACDC to answer to.

- Q5 What is the justification for referring to limited infilling in Policy LG7, which is concerned with rural exception sites?**

RPC Response:

This is a question for SACDC to answer to.

- Q6 What is the justification for referring to 'affordable-only' housing and setting a threshold of 9 dwellings in Policy LG7? Is this justified and consistent with national planning policy?**

RPC Response:

This is a question for SACDC to answer to.

- Q7 What is the rationale for Policy LG8, given that the overarching approach in Policy LG5 is to consider development proposals in the Green Belt against national planning policy?**

RPC Response:

No response.

- Q8 Is Policy LG8 consistent with national planning policy, with particular reference to whether the construction of new buildings is regarded as inappropriate development?**

RPC Response:

No response.

- Q9 What is the justification for using prescribed amounts in Policy LG9? Is this justified, effective or consistent with national planning policy?**

RPC Response:

This is a question for SACDC to answer to.

Issue 3 – Biodiversity and The Chilterns National Landscape – Policies SP10 and NEB5 – NEB12

Q1 Are Policies SP10 and NEB5 – NEB12 positively prepared, justified, effective and consistent with national planning policy?

RPC Response:

In order for policy NEB10 to be effective, RPC suggested refinements to the policy text at Regulation 19 stage, which should be incorporated. These changes are pragmatic: (i) ensure NEB10 requires a Landscape Strategy not only for “major” schemes, but where local sensitivity warrants it (e.g., development near the Chilterns NL setting or Green Belt edges); (ii) keep policy language focused on “landscape strategy” rather than “landscaping” so design-led integration isn’t reduced to planting lists; and (iii) align HGC/Broad Locations landscape requirements with the published assessments to avoid gaps or contradictions.

Q2 What is the justification for stating that a net gain of higher than 10% is strongly encouraged in Policy NEB6? Could this lead to confusion as to what is required from development proposals?

RPC Response:

No response.

Q3 Does Policy NEB7 provide sufficient flexibility to account for site specific circumstances?

RPC Response:

No response.

Q4 What is the justification for Policy NEB11, especially criterion b)?

RPC Response:

The proposed wording is justified, but it is not effective if it does not include specific mention to the setting of the National Landscape.

Criterion b has been removed in the proposed Main Modifications.