

Redbourn Parish Council

Matter 12 – Design Standards and the Historic Environment

Issue 1 – High Quality Design – Policies SP12 and DES1 – DES8

- Q1 Are Policies SP12 and DES1-DES8 positively prepared, justified, effective and consistent with national planning policy?**

RPC Response:

No response.

- Q2 Are Policies DES1/DES4 effective in setting a prescriptive requirement for all development to be set a minimum of 1m away from the neighbouring property / boundary above ground level?**

RPC Response:

No. A fixed dimension risks constraining good design and can be unnecessary where amenity, access/maintenance, fire safety and drainage can be secured by other means. DES1 and DES5 already provide robust, outcome-based tests (overlooking, overshadowing, overbearing, outlook, and future developability of adjoining plots). The policy should therefore be flexible, allowing site-specific design solutions where they demonstrably protect amenity and servicing.

- Q3 What is the density requirement in Policy DES3 based on? Is it justified and will it be effective in St Albans?**

RPC Response:

No response.

- Q4 What is the justification for referring to single storey extensions ‘not normally’ extending more than 3m along a party boundary. How does this take into account the context each site and the relationship between neighbouring properties? Is the policy effective?**

RPC Response:

RPC does not support use of the wording “not normally” because it creates uncertainty, making the policy criteria ineffective. The policy should set out a clear framework for design, and not include wording that could be interpreted differently by the local community, development management officers and developers.

- Q5 What is the justification for the specific separation distances and sizes in Policy DES5? Does the policy include adequate flexibility to account for site specific factors where alternative arrangements may also be acceptable? Is the policy effective?**

RPC Response:

RPC considers that specific separation distances should not sit in policy text. DES5 should remain outcome-based, focused on safeguarding living conditions: daylight/sunlight, outlook, privacy, and avoidance of overbearing. Where useful, illustrative distances and design techniques (e.g. oblique window placement, screening, split-level sections) can be set out in supporting guidance/SPD, not as determinative policy metrics. This keeps the emphasis on amenity performance, allows well-designed alternatives on constrained plots, and avoids mechanistic, distance-led decisions.

- Q6 What is the justification for the Building Height Control Area in Policy DES6? Is it based on appropriate, available evidence and are the requirements clear, effective and justified?**

RPC Response:

No response.

- Q7 Have an appropriate range of viewpoints been used to support Figure 12.1 and will be effective in managing development in the City Centre?**

RPC Response:

No response.

- Q8 What is the justification for requiring accordance with 'current local and County Council guidance' in Policy DES7, which do not form part of the development plan?**

RPC Response:

This is a question for SACDC to answer to.

Issue 2 – The Historic Environment – Policies SP11 and HE1 – HE8

- Q1 Are Policies SP11 and HE1 – HE8 positively prepared, justified, effective and consistent with national planning policy?**

RPC Response:

No response.

Q2 Is the Plan supported by appropriate and proportionate evidence in respect of likely effects on the historic environment? How has that evidence guided the approach in the Plan?

RPC Response:

While the Plan contains overarching heritage policies, the allocation evidence for Redbourn is not appropriate or proportionate to the level of change proposed and has not demonstrably guided the allocations in the way national policy expects. In Matter 7 evidence, RPC set out that the West Redbourn (B3) allocation lies within the open landscape contributing to the setting of the Grade I Church of St Mary and the Redbourn Conservation Area, yet the allocation boundary, quantum and requirements appear unchanged following the B3 West of Redbourn Heritage Impact Assessment: the policy relies on future masterplanning and generic “setbacks,” without tested parameters on view corridors, spatial relationships, townscape grain, landscape structure or experiential qualities. The submitted material does not show that a Heritage Impact Assessment (HIA) has shaped the capacity, layout principles or the policy wording for B3; nor does it assess cumulative effects with nearby growth (including Hemel Garden Communities) on the village’s historic character. In short, the Plan’s heritage evidence has not been carried through to allocation design and capacity, leaving an evidential gap for Redbourn.

To make the approach sound, RPC asks for: (i) a site-specific Historic Impact Assessment addendum for B3 that maps key views and attributes to the setting (e.g., Church End/High Street approaches and open foregrounds), tests capacity scenarios, and translates findings into binding allocation criteria (view protection, landscape-led edges, maximum building heights/typologies in sensitivity zones, and heritage-led masterplan principles); and (ii) a clear requirement that outline applications provide a heritage-and-LVIA-led masterplan with a Design Code that secures those parameters at permission stage. This would align the Plan with national policy by ensuring the heritage baseline drives the quantum and form of development, rather than being deferred to later design stages.

Q3 Does Policy HE2 apply only to non-designated heritage assets which are locally listed? Are criteria used to establish whether something represents a non-designated heritage asset clear and effective?

RPC Response:

RPC’s reading is that policy HE2 aims to safeguard non-designated heritage assets and apply weight according to significance, with the local list as an important (but not exclusive) subset, consistent with national policy. However, criterion (b) is

framed around “buildings” and risks excluding assets that are not buildings, such as spaces, landmarks/vistas, historic routes and paths, boundary treatments (walls/hedgerows), signage/wayfinding, street furniture and other townscape features. To improve effectiveness and align with how heritage significance is understood and recorded in the Historic Environment Record, criterion (b) should refer to “heritage assets” rather than “buildings”, and the supporting text should explicitly recognise non-built assets and their evidential, historical, aesthetic and communal values.

Q4 What is the justification for Local Plan Appendices 2-5?

RPC Response:

This is a question for SACDC to answer to.

Issue 3 – Climate Change and Building Efficiency – Policies SP2, CE1 and CE2

Q1 Is the prioritisation of previously developed land in Policy SP2 consistent with national planning policy?

RPC Response:

No response.

Q2 What is the justification for Policy SP2(k)? Is it effective and consistent with national planning policy?

RPC Response:

As drafted, SP2(k) risks being ineffective because the option of environmental payments/offsets could be read as a convenient substitute for actually meeting the Plan’s climate and environmental requirements on site. In practice, a “pay-to-offset” route could dilute or defer delivery of core expectations: fabric-first energy performance, on-site renewables, SuDS and surface-water attenuation, urban greening/biodiversity net gain, active-travel permeability and air-quality mitigation, etc. making other policies ineffective.

Q3 What is the justification for Policy CE1(b)? Is it clear to users of the Plan precisely what is required? Is the policy effective?

RPC Response:

No response.

Q4 How will decision-makers, developers and local communities determine if a proposal accords with Policy CE2(a) and (b)? Is the policy clear and effective?

RPC Response:

As drafted, CE2 is neither clear nor effective. It states an ambition to maximise renewable/low-carbon energy but does not tell applicants, or development management officers, who must do what, with what evidence, and against which metrics. It is unclear whether minor development must submit an Energy (or “Energy & Carbon”) Statement, and “low-carbon energy” is not defined. That ambiguity will lead to inconsistent validation, variable-quality submissions, and weak enforceability.

To make CE2 workable, the Plan should set out a simple, tiered expectation: all major schemes must submit an Energy Strategy demonstrating a clear energy hierarchy, quantified predicted operational energy and the proposed share met by renewables/low-carbon sources. Minor schemes should provide a proportionate Energy Statement confirming feasible measures or explaining, with evidence, any constraints.

With these clarifications, scope by development type, a defined hierarchy, clear metrics and a proportionate evidence list, decision-makers, developers and communities will be able to determine whether proposals accord with CE2(a) and (b).