

Redbourn Parish Council
Matter 6 – Hemel Garden Communities (Sites)

ISSUE 7 – North Hemel Hempstead (H1)

Q1. What is the site boundary based on and is it justified and effective? What is the justification for the area highlighted as excluded from the allocation?

RPC Response:

The eastern boundary of the housing area is a row of pylons which is not a strong boundary and is therefore ineffective. We understand the reason for the boundary is due to land ownership alone, rather than for any technical or other physical reasons.

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?

RPC Response:

There is no justification for releasing the site from the Green Belt (as per our responses in Issue 1 and the question that follows).

In terms of the boundary, please see our response above. The approach taken means that there is a future risk that the revised boundaries will be subject to further unplanned change.

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

RPC Response:

No.

Area H1 comprises Green Belt Parcels 169a - 172. The Green Belt review indicates that all of these Parcels perform strongly against the purposes of the Green Belt, and that they make an important contribution to the wider Green Belt.

The review states that release of these Parcels would lead to large scale sprawl of Hemel Hempstead and significantly reduce the gap between Hemel Hempstead

and Redbourn, and that development would introduce urbanising influences that would diminish the sense of openness in the countryside. It is concluded that release of these would result in considerable harm to the Green Belt. The Review recommends that the Parcels are not considered further.

Release of these Parcels of land from the Green Belt has not been justified.

Q4. How have the landscape impacts of the allocation been considered, having particular regard to the setting of the Chilterns National Landscape?

RPC Response:

The Landscape Assessment does not outline the likely impacts on the landscape that will be caused by the proposed scale of development. It simply moves from identification of sensitivities to considerations for development, without having first established an evidence-led approach to impacts and mitigations. The mitigations proposed include landscape screening. However, it is not clear how this responds to the landscape character of the area.

There is no clear link in the assessment between identified harm and proposed mitigations. The assessment also fails to consider the cumulative impact of development on the gap between Hemel Hempstead and Redbourn, despite the report acknowledging that the gap is important in landscape terms. Furthermore, the assessment fails to consider the visual sensitivity of the area, and thus its relationship with the National Landscape and impacts on the setting of this. It is considered that the proximity of the development area to the National Landscape will have a detrimental impact upon the beauty of it.

Q5. How have the mix of uses been established and how will development proposals come forward in a coordinated and coherent manner that achieves the aims and objectives of the wider HGC proposals?

RPC Response:

This is for SACDC to respond to however please see our earlier responses which explain how there is no coordinated or coherent plan to show how infrastructure and development will take place across sites and local authority areas.

Q6. Can the allocation deliver the necessary mix of uses and supporting infrastructure? Is it developable within (and beyond) the plan period?

RPC Response:

No, please see our previous responses.

- Q7. 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?**

RPC Response:

This is unclear from the evidence. We also note that a Country Park is proposed; we consider it unlikely that people will choose to visit this over the SAC area.

- Q8. Is Policy H1 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?**

RPC Response:

Notwithstanding the fact that identification of the site is contrary to national policy on Green Belt, NPPF paragraph 35 requires policies to be "deliverable over the plan period" and capable of being implemented effectively, providing a clear framework for decision-making".

While Policy H1 sets out comprehensive obligations for the North Hemel Hempstead Broad Location, in practice its effectiveness is limited by vague and sometimes ambiguous language. For example, requirements such as providing a "range of community food growing opportunities," creating a "substantial new Significant Publicly Accessible Green Area," or enabling "enhancements" to Woodhall Farm local centre, are not sufficiently precise to guide developers or decision-makers on what would satisfy the policy. Similarly, instructions to "minimise harm" to heritage assets or the landscape are subjective and lack quantifiable or testable criteria.

This imprecision makes it difficult to determine how proposals should be assessed against the policy and creates the risk of inconsistent interpretation and application. Furthermore, the policy does not incorporate triggers or thresholds to ensure that obligations are proportionate to the scale, nature, or phasing of development. Without these mechanisms, there is a risk that smaller or phased proposals could be subject to obligations intended for the wider strategic allocation, reducing overall deliverability. There is also a risk that some medium-scale proposals may be interpreted by decision-makers or developers as not requiring compliance with certain requirements, when in fact they should, further undermining the policy's effectiveness.

In conclusion, the combination of vague language, mixed directive and aspirational elements, and lack of proportionate triggers undermines its effectiveness in line with NPPF paragraph 35. Strengthening clarity, distinguishing mandatory from aspirational elements, and introducing thresholds would improve the policy's deliverability and certainty for decision-makers and applicants.

ISSUE 8 – East Hemel Hempstead (North) – H2

- Q1. Having established at a strategic level that alterations were necessary to the Green Belt boundary, how did the Councils determine the extent of alterations required?**

RPC Response:

This is for SACDC to respond to, it is currently unclear.

- Q2. How do the proposed boundary alterations relate to the supporting evidence through the Green Belt Assessments and site selection methodology?**

RPC Response:

They do not.

Area H2 is within Green Belt Parcel 168. The Green Belt review indicates that the Parcel performs strongly against the purposes of the Green Belt, and that it makes an important contribution to the wider Green Belt. The review states that release of this Parcel would lead to the merging of built-up areas and that release, either in isolation or in combination with other Parcels, would significantly alter the performance of the Green Belt, and lead to large scale, irregular and disproportionate sprawl. The Review recommends that the Parcel is not considered further.

Release of this Parcel of land from the Green Belt has not been justified. It has not been demonstrated by SACDC that the need for housing has outweighed the harm to the Green Belt.

- Q3. Are the proposed boundary alterations 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?**

RPC Response:

The eastern boundary of the housing area is a row of pylons which is not a strong boundary and is therefore ineffective. The approach taken means that there is a future risk that the revised boundaries will be subject to further unplanned change.

- Q4. How have the landscape impacts of the allocation been considered, having particular regard to the setting of the Chilterns National Landscape?**

RPC Response:

This is for SACDC to respond to.

- Q5. How have the mix of uses been established and how will development proposals come forward in a coordinated and coherent manner that achieves the aims and objectives of the wider HGC proposals?**

RPC Response:

This is for SACDC to respond to however please see our earlier responses which explain how there is no coordinated or coherent plan for how infrastructure and development will take place across sites and local authority areas.

- Q6. Can the allocation deliver the necessary mix of uses and supporting infrastructure? Is it developable within (and beyond) the plan period?**

RPC Response

No, please see our previous responses.

- Q7. 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?**

RPC Response

This is unclear from the evidence. We also note that a country park is proposed; we consider it unlikely that people will chose to visit this over the SAC area.

- Q8. Is Policy H2 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?**

RPC Response

It is not justified, effective or consistent with national planning policy. Modifications would need to first be based on an appropriate strategy, proportionate evidence, demonstrated to be deliverable with cross-boundary strategic matters being dealt with rather than deferred.

ISSUE 9 – East Hemel Hempstead (Central) – H3

15. Site H3 is allocated as an ‘employment led mixed use (Enterprise Zone)’. Unlike allocations H1, H2 and H4, allocation H3 does not specify a quantum or capacity of employment land, nor what proportion of the site is anticipated to be developed within the plan period.

Q1. What is the scale of development proposed, how has it been established and is the Plan clear and effective around the types of development permitted?

RPC Response:

The scale of development allocated under Policy H3 is not clearly defined and lacks the precision necessary for effective plan-making and decision-taking. The policy identifies the site as an “employment-led mixed-use” allocation within the East Hemel Hempstead (Central) area, covering 53.42 hectares. However, it does not specify the quantum of employment floorspace, nor does it provide a clear breakdown of the types of employment uses anticipated, their phasing, or the proportion of the site expected to be delivered within the plan period.

While the policy refers to the site forming part of an “Enterprise Zone,” this is not accompanied by a clear framework or evidence base that sets out what this entails in terms of land use, job creation, or infrastructure requirements. The absence of a defined employment floorspace target or trajectory undermines the ability to assess whether the allocation is realistic, deliverable, or aligned with the wider economic strategy for the area.

Q2. How will development proposals come forward in a coordinated and coherent manner that achieves the aims and objectives of the HGC?

RPC Response:

This is for SACDC to respond to however please see our earlier responses which explain how there is no coordinated or coherent plan for how infrastructure and development will take place across sites and local authority areas.

Q3. What is the justification for criterion 16 under Policy H3 which safeguards land to the east of Junction 8 of the M1? Does this form part of the allocated site, and if so, what are development proposals expected to do in order to achieve compliance with the policy?

RPC Response:

This is for SACDC to respond to. However, it should be noted that the safeguarded land corresponds to a larger area previously considered for a new motorway junction (Junction 8a), which no longer appears to be an active proposal. Instead, the current infrastructure proposal is for a pedestrian and cycle bridge across the

M1, which would require a significantly smaller land take. If this is the case, the extent of the safeguarded land is excessive and unjustified.

It is also unclear whether this safeguarded land forms part of the allocated site under Policy H3. The policy and accompanying maps do not clearly delineate the boundary of the allocation in relation to the safeguarded area. This lack of clarity creates uncertainty for landowners, developers, and the local community.

- Q4. 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?**

RPC Response:

In contrast to other parts of the Hemel Garden Communities allocation, where the proposed Green Belt boundary relies on weak and impermanent features such as electricity pylons, the boundary alteration associated with Policy H3 is defined by the M1 motorway: a clear, permanent, and readily recognisable physical feature. This is aligned with paragraph 148(f) which requires Green Belt boundaries to be appropriately drawn using enduring landscape features.

However, this example also serves to underscore the inconsistency elsewhere in the Plan, where boundaries have been proposed without reference to such features. The reliance on electricity pylons in other locations fails to meet the same standard of permanence and clarity, highlighting a lack of a consistent, evidence-led approach to Green Belt boundary definition across the HGC area.

- Q5. Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?**

RPC Response:

No.

Area H3 is within Green Belt Parcel 167. The Green Belt review indicates that the Parcel performs strongly against the purposes of the Green Belt. It states that the Parcel makes an important contribution to safeguarding the countryside from encroachment and, in combination with Parcel 168 (East of Hemel, North), would lead to irregular and large-scale sprawl, and that it would significantly reduce the gap between Hemel Hempstead and Redbourn. Release of this Parcel of land from the Green Belt has not been justified.

Q6. How have the landscape impacts of the allocation been considered, having particular regard to the setting of the Chilterns National Landscape?

RPC Response:

This is for SACDC to respond to.

Q7. What is the justification for criterion 29 and the requirements for contributions towards Strategic Access Management and Monitoring and the provision of Suitable Alternative Natural Greenspace?

RPC Response:

This is for SACDC to respond to.

Q8. What is the justification for the provision of accommodation to help meet the needs of gypsies and travellers on H3, and not all other sites within the HGC Programme Area?

RPC Response:

RPC has previously raised concerns about over-concentration of sites near Redbourn, especially in combination with Dacorum's proposals. Sites should be allocated where the need is and where there is sufficient infrastructure and services. The two large new sites proposed at East Hemel Hempstead (close to Redbourn) and potential expansion of Tullochside Farm would intensify these concerns. This could have implications for local infrastructure, landscape character, and community cohesion.

Q9. Is Policy H3 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

RPC Response:

It is not justified, effective or consistent with national planning policy. Modifications would need to first be based on an appropriate strategy, proportionate evidence, demonstrated to be deliverable with cross-boundary strategic matters being dealt with rather than deferred.