

Redbourn Parish Council
Matter 7 – Residential Site Allocations

Issue 5 – Redbourn and Hemel Hempstead Site Allocations

Policy B3 – West Redbourn

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

RPC Response:

Redbourn Parish Council (RPC) considers that the scale of development proposed at Policy B3 (West Redbourn) is neither appropriate nor proportionate to the scale, role, and function of Redbourn as defined in the Draft Local Plan and its supporting evidence base. Redbourn is identified as a Tier 4 settlement in the Settlement Hierarchy, classified as a “Large Village.” Despite this designation, the Draft Local Plan proposes to allocate 618 dwellings directly to Redbourn, and a total of 3,718 dwellings within the parish boundary when including the Hemel Garden Communities allocations. This equates to approximately 30% of the total housing growth proposed across the District, which is a disproportionate figure for a village of Redbourn’s size and function.

The Settlement Hierarchy Study (2023) acknowledges that Redbourn lacks higher-order services like a major supermarket or leisure centre and has fewer employment sites than other settlements higher in the hierarchy, such as London Colney. The village is also poorly connected by public transport, with infrequent and limited bus services, especially in the evenings and on Sundays. While the Nickey Line is referenced throughout the Local Plan documents as a strategic active travel route, RPC has demonstrated that it is currently unsuitable for inclusive commuting due to poor surfacing, lack of lighting, and limited connectivity to key destinations, thus having limited capacity to support modal shifts in the village.

The Draft Local Plan’s spatial strategy claims to prioritise development in sustainable locations, yet the allocation of significant growth to Redbourn contradicts this principle. The village is car-dependent and lacks the infrastructure to support such expansion sustainably. The proposed growth would increase Redbourn’s population by approximately 30% within 12 years, based on average household size data from the Office for National Statistics. This scale of change risks undermining the village’s character, cohesion, and identity, as recognised in the Redbourn Neighbourhood Plan (2023), which emphasises preserving Redbourn’s rural setting and built heritage.

In conclusion, RPC maintains that the proposed allocation at West Redbourn is unsound. It is not proportionate to Redbourn’s role in the settlement hierarchy, is not supported by infrastructure, and is not aligned with the Local Plan’s strategic objectives.

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

RPC Response:

RPC does not consider that the site at West Redbourn can accommodate the number of homes proposed and comply with all other policy requirements and wider national design, natural and historic environment guidance and aspirations. The need for relevant mitigation and open space should be properly taken into account, as well as other constraints within the site.

The site is subject to a number of constraints that materially affect its developable area. These include:

- Noise pollution from the adjacent M1 motorway, which has not been properly assessed. The Draft Local Plan requires a noise assessment and mitigation strategy, but this work has not yet been undertaken. RPC considers this a potential “showstopper” for the site, and it is unclear whether mitigation can be achieved without compromising the developable area (subject to mitigation strategy).
- Air quality concerns, also linked to the M1, have been dismissed in the Sustainability Appraisal without proper technical assessment. The SA assumes that air quality concerns are decreasing nationally, but this is not a sound basis for allocating housing in a location exposed to high levels of pollution.
- Landscape and visual impacts, which have not been adequately addressed in the allocation policy. The Landscape and Visual Assessment Sheet (September 2024) identifies the need for careful mitigation, including structural tree planting and the creation of a green route through the site. However, these requirements have not been translated into the policy wording or the masterplanning principles. These should be considered and would have clear implications on development capacity.
- Heritage constraints, including proximity to the Grade I listed Parish Church of St Mary and the Redbourn Conservation Area. The allocation policy refers to minimising harm through masterplanning and setbacks, which definitely reduce the developable area.
- Infrastructure requirements, including a new primary school, pedestrian and cycle connectivity, and mitigation of utility infrastructure such as pipelines and electricity transmission lines. These have not been fully assessed or costed, and there is no evidence that the site can accommodate all of these requirements alongside the proposed housing quantum.

Taken together, these constraints significantly reduce the developable area of the site and raise serious concerns about its ability to accommodate 545 dwellings while also delivering the necessary mitigation, open space, and infrastructure. The Local Plan is not supported by evidence demonstrating that the site has the capacity to do so, nor has it tested development scenarios that account for the spatial requirements and mitigation measures set out in the Plan. Crucially, the Council has

failed to assess appropriate density ranges that would demonstrate whether the proposed housing numbers can be achieved alongside the required open space and environmental safeguards. RPC therefore considers that the site cannot accommodate the number of homes proposed in a manner that is justified, effective, or consistent with national policy.

- 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?**

RPC Response:

This will need to be explained by SACDC.

The Green Belt Review (Stage 1, 2013) identified only a small sub-area at the southwest edge of Redbourn as potentially suitable for further assessment. Yet, the Draft Local Plan proposes a larger release.

Moreover, the Green Belt Review (Stage 2, 2023) itself acknowledges that many of the sub-areas proposed for release, including those around Redbourn and Hemel Hempstead, do not meet the NPPF's criteria for permanence. The boundaries are described as "not likely to be permanent" and in need of "strengthening," which directly contradicts paragraph 148(f). The reliance on features such as the M1 motorway as a boundary is also questioned, as the motorway is not impermeable and allows for multiple crossings, undermining its effectiveness as a defensible edge. The northern boundary relies on a narrow and understated farm track, which does not prevent further encroachment into the green belt and does not represent a permanent and impermeable feature.

In terms of paragraph 148(e), which requires that boundaries endure beyond the plan period, the Parish Council highlights that the Local Plan does not provide any assurance that the proposed boundaries will remain fixed. On the contrary, the erosion of strategic gaps between settlements, particularly between Redbourn and Hemel Hempstead, is a clear indication that the permanence of these boundaries is already compromised. The Review fails to assess the cumulative impact of multiple Green Belt releases in close proximity, which together threaten the integrity of the Green Belt and its long-term function.

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

RPC Response:

RPC acknowledges that the Council's Green Belt and Exceptional Circumstances Evidence Paper (Sept 2024) provides a broad justification for releasing Green Belt

land across the district to meet housing needs. However, this reasoning is generalised and does not demonstrate why the West Redbourn site must be released.

Exceptional circumstances do not exist to justify amending the Green Belt boundary at West Redbourn.

The Council has failed to demonstrate that all reasonable alternatives have been exhausted, as required by paragraph 146 of the National Planning Policy Framework. There is no evidence of full utilisation of brownfield land (especially now that the Stage 2 Matter 1 Statement of Common Ground (October 2025) between SACDC and HCC suggests that site UC33 would be removed from the Local Plan), no clear strategy for optimising urban densities, and no substantive engagement with neighbouring authorities to explore alternative options. The proposed allocation disregards the findings of the Green Belt Review and would significantly erode strategic gaps between settlements, undermining the fundamental purposes of the Green Belt.

Q5. 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 impacts of the West Redbourn allocation have not been sufficiently considered, particularly in relation to how the Local Plan has responded to the findings of the Council's own Landscape and Visual Appraisal (September 2024).

While the appraisal identifies key sensitivities, such as the site's open arable character, its role in maintaining Redbourn's rural setting, and its proximity to the Redbourn Conservation Area and Grade I Listed Parish Church, it does not appear all findings have meaningfully shaped the allocation or its policy requirements. The northern part of the site, for example, is acknowledged as disconnected from the settlement and at risk of creating ribbon development along Lybury Lane, yet the allocation proceeds without clear safeguards or design principles to prevent this.

With regard to the Chilterns National Landscape, the appraisal concludes there is no intervisibility or impact on its setting. However, this conclusion is reached without detailed viewshed analysis, despite the site's sloping topography and potential for long-range views. The potential for indirect and cumulative impacts on the wider landscape character, particularly in combination with other nearby allocations, is not explored.

Mitigation measures proposed in the Landscape and Visual Appraisal, such as structural planting and green infrastructure, are generic and not tailored to the specific sensitivities of West Redbourn. Furthermore, many of the Landscape and Visual Appraisal's mitigation measures have not made it to the allocation policy.

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

RPC Response:

No response.

- 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?**

RPC Response:

This is a question for SACDC to answer.

- 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?**

RPC Response:

The Local Plan does acknowledge the proximity of the West Redbourn site to the Grade I listed Parish Church of St Mary and the Redbourn Conservation Area, and includes a policy requirement stating that, “through Masterplanning, the layout and design of development should minimise any harm to the setting and significance” of these heritage assets. It also suggests that this may include “appropriate set backs of development.”

However, this approach is limited and insufficient. It delegates the responsibility for safeguarding heritage entirely to a future masterplan, which is currently undefined and untested. There is no evidence that the allocation itself has been shaped by a detailed understanding of the significance of these assets or their setting. The policy wording implies that setbacks alone may be an adequate solution, yet this is a reductive and prescriptive approach to heritage conservation. The setting of a Grade I listed church and a designated conservation area requires a nuanced, site-specific response, one that considers views, landscape character, spatial relationships, and the experiential qualities of the place, not simply distance.

RPC’s Regulation 19 representations raise further concerns: the Heritage Impact Assessment (HIA) prepared for the site is not referenced in the policy, and its findings do not appear to have informed the allocation’s boundary, capacity, or design requirements. It also highlights that the site lies within the open landscape that contributes to the church’s setting and the village’s historic character, and that development here risks eroding this relationship. These issues don’t have a response in the allocation policy, neither in the site boundary, the policy requirements nor in terms of housing capacity estimates.

In summary, while the Local Plan includes a general reference to heritage, it does not demonstrate that the allocation has been properly informed by a robust assessment of the setting of the Parish Church of St Mary and the Redbourn Conservation Area. The reliance on future masterplanning and generic mitigation measures is ineffective and does not meet the requirements of national policy for the conservation and enhancement of designated heritage assets.

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?

RPC Response:

The Local Plan does not provide sufficient clarity or assurance that a safe and suitable access to the West Redbourn site can be achieved. While the allocation includes references to pedestrian and cycle connectivity, such as links to the Nickey Line and public rights of way, it fails to set out any expectations for vehicular access, which is critical to understanding the site's deliverability and suitability.

The policy for West Redbourn (B3) does not identify where vehicular access should be taken from, nor does it establish a route hierarchy, minimum number of access points, or preferred options. Roads such as Mansdale Road, Flamsteadbury Lane, Lybury Lane, and Gaddesden Lane could potentially serve the site, but each presents different implications for traffic flow, safety, and the scale of necessary highway improvements. Yet the Plan remains silent on these matters.

This lack of specificity means that users of the Plan, including residents, developers, and decision-makers, cannot understand what highway improvements may be required, where they would be located, or how they would be delivered. The issue is effectively delegated to future masterplanning, but the policy does not even confirm that access arrangements are to be addressed through that process. This creates uncertainty and undermines confidence in the site's deliverability.

In summary, the Local Plan fails to demonstrate that safe and suitable access to West Redbourn can be achieved and does not provide sufficient clarity on the necessary highway improvements. This omission affects the soundness of the allocation, particularly in terms of effectiveness and deliverability.

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

RPC Response:

Policy B3 (West Redbourn) is not justified, effective, or consistent with national planning policy in its current form.

It lacks a robust evidence base to support the release of Green Belt land, failing to demonstrate exceptional circumstances as required by paragraph 146 of the NPPF.

The allocation does not adequately respond to landscape, heritage, or access constraints identified in the Council's own evidence base and in Regulation 19 representations.

The policy is vague on critical matters such as vehicular access, highway improvements, and infrastructure delivery. It delegates key issues, such as safeguarding heritage assets to future masterplanning, without setting clear parameters or requirements. The reliance on generic mitigation measures and the absence of site-specific guidance undermines its effectiveness and deliverability.

To make the Plan sound, Policy B3 should be modified to:

- The housing capacity should be reduced so it is adequate to the actual capacity of the site and the settlement hierarchy.
- Clearly define access arrangements and required highway improvements/contributions.
- Include a landscape-led masterplanning requirement, with specific reference to the setting of Redbourn and the Chilterns National Landscape.
- Strengthen heritage protections with detailed design principles informed by a Heritage Impact Assessment.
- Reassess the scale and extent of development in light of these constraints.

Without these modifications, the policy does not meet the tests of soundness set out in the NPPF.

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?

RPC Response:

RPC does not consider the scale of development at M6 (approximately 68 dwellings) to be appropriate or proportionate to the village's scale, role, or infrastructure capacity.

Redbourn is identified as a Tier 4 Large Village in the settlement hierarchy (Policy SP3). The Local Plan already allocates a significant broad location at West Redbourn (B3) for a minimum of 545 dwellings, together with major growth at North and East Hemel Hempstead immediately adjoining the parish boundary. Collectively, these allocations will substantially increase the local population and traffic movements, place pressure on primary healthcare and education, and alter the village's setting and character.

Against this context, the addition of another 68 dwellings on a constrained, partly flood-affected greenfield site represents an overconcentration of growth at Redbourn, inconsistent with its role as a lower-tier settlement. It would also be out of scale with the village edge, eroding the semi-rural character that defines the settlement's relationship with the open countryside.

RPC therefore considers that the proposed scale is neither proportionate nor sustainable given the cumulative pressures on the village and the limited local infrastructure.

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:

RPC maintains that the alteration of the Green Belt boundary at M6 is not justified in strategic terms.

While it is accepted that the proposed boundary would follow clear, permanent physical features, notably Harpenden and the Nickey Line and A5183 Road, and is therefore likely to satisfy NPPF 148(e) and (f), this does not of itself justify the release of the land from the Green Belt.

The key issue is that the site performs a strong Green Belt function, contributing to:

- Safeguarding the countryside from encroachment (Purpose 3), and
- Preserving the setting and semi-rural character of Redbourn village (Purpose 4).

The exceptional circumstances case advanced for release remains unconvincing and non-site-specific, relying largely on borough-wide housing pressure rather than any unique spatial logic at this location.

Therefore, while the physical boundary may be clearly defined, the strategic justification for altering it remains unsound, and the release would erode the functional openness of this part of the Green Belt.

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

RPC Response:

RPC acknowledges that the Council's Green Belt and Exceptional Circumstances Evidence Paper (Sept 2024) provides a broad justification for releasing Green Belt land across the district to meet housing needs. However, this reasoning is generalised and does not demonstrate why the small parcel south of Harpenden Lane (M6) must be released.

Exceptional circumstances do not exist to justify amending the Green Belt boundary at Land South of Harpenden Lane (M6).

The Council has failed to demonstrate that all reasonable alternatives have been exhausted, as required by paragraph 146 of the National Planning Policy Framework. There is no evidence of full utilisation of brownfield land (especially now that the Stage 2 Matter 1 Statement of Common Ground (October 2025) between SACDC and HCC suggests that site UC33 would be removed from the Local Plan), no clear strategy for optimising urban densities, and no substantive engagement with neighbouring authorities to explore alternative options. The proposed allocation disregards the findings of the Green Belt Review and would significantly erode strategic gaps between settlements, undermining the fundamental purposes of the Green Belt.

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?

RPC Response:

RPC is not satisfied that a safe and suitable access has been demonstrated.

The site fronts Harpenden Lane, the A5183 Road and the High Street, heavily trafficked routes with limited visibility, no continuous footways, and congestion at the nearby A5183/High Street and A5183/Harpenden Lane junctions. Other potential access points could be from Crown Street, but this may not be capable to accommodate traffic for the proposed development as it is a road that sits lower in the hierarchy of routes in the area. The policy notes that direct access from the A5183 should be avoided but gives no clarity on an alternative access solution or its deliverability.

The evidence base contains no detailed transport assessment demonstrating capacity, visibility, or safe pedestrian and cycle connections.

Without defined improvement measures or identified delivery mechanisms, the Plan does not meet NPPF. A safe and suitable access has not been proven.

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

RPC Response:

Flood risk remains a fundamental concern.

The Council's Flood Risk Sequential and Exception Test (SADC/ED64, Dec 2024) confirms that site M6 was screened in for detailed assessment because of significant fluvial and surface-water risk at its eastern edge. Approximately 29 % of the site lies within Flood Zones 2 and 3, and around 39 % is affected by surface-water flooding.

Following assessment through the Strategic Flood Risk Assessment (2024), the site was required to undergo the Exception Test, which it subsequently passed, on the

basis that flood-affected areas could be excluded from development and that mitigation could be incorporated through sustainable drainage and open-space design.

RPC recognises that this formal testing has been undertaken. However, the evidence also demonstrates that a large proportion of the site remains at elevated risk, meaning its developable area and layout are tightly constrained. The ability to deliver housing safely while maintaining policy-compliant SuDS, open space, and ecological buffers has yet to be proven through detailed design.

In RPC's view, although M6 may technically have met the Sequential and Exception Tests, the residual risk and limited developable area make the allocation marginal and potentially undeliverable without significant mitigation. These factors reduce confidence that the site is a sound or sustainable choice compared with lower-risk alternatives.

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?

RPC Response:

This is a question for SACDC to respond to.

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

RPC Response:

RPC concludes that Policy M6 is not justified, effective, or consistent with national policy.

- Not justified: The allocation lacks robust, site-specific evidence on access, flood risk, and Green Belt release.
- Not effective: Key delivery dependencies—safe access, flood mitigation, and SAC contributions—remain unresolved.
- Not consistent with national policy: The proposal conflicts with NPPF principles on Green Belt (146–148), flood risk (163–168), and transport safety (110–111).

To make the Plan sound, RPC recommends either:

- Deletion of Policy M6 from the Local Plan, redistributing its small housing yield to more sustainable and deliverable locations; or
- If retained, major modification to require: the completion of an additional Exception Test and flood mitigation strategy before to inform capacity and design guidance; the explicit prohibition of vehicular access from the A5183 and more specific access tests and requirements, landscape-based design

ensuring the Green Belt boundary forms a defensible and permanent edge and that it manages flooding and water in general, sustainably.

Issue 11 – Urban Car Parks and Garage Sites

Policy UC33 (Land Rear of Snatchup, Redbourn)

Q1. What is the justification for allocating existing car parks and garages which remain in use? Are the sites available for development?

RPC Response:

The allocation of UC33 (Land Rear of Snatchup, Redbourn) is justified by its modest scale, sustainable location within the settlement boundary, and alignment with national policy encouraging the efficient use of land. Repurposing garage courts and car parks for housing can help meet local needs without encroaching on the Green Belt.

SACDC should provide evidence demonstrating that the site is available and identify when the development would be expected to in the plan period.

The latest Stage 2 Matter 1 Statement of Common Ground (October 2025) between SACDC and HCC confirms that site UC33 should be removed from the Local Plan due to its unacceptable flood risk and drainage constraints. The authorities agree that the site is not suitable for allocation, despite its small scale and sustainable village location. However, it is not clear the rationale of the removal of site UC33 and why M6 is to be retained in the Plan.

Q2. What is the justification for requiring surveys of car park usage before proceeding with development proposals as set out in Part B of the Plan? Has any evidence been provided at this stage to determine usage and consider the consequences of redevelopment on the availability of parking, highway safety, the living conditions of local residents and impacts on local businesses?

RPC Response:

Surveys are not required for a private garage site such as Land Rear of Snatchup; therefore, RPC considers this question not applicable and offers no response.