
Examination of the St Albans City and District Local Plan

Matter 7 – Residential Ste Allocations Issues: Redbourn and Hemel Hempstead Allocations

1. Introduction

- 1.1. This examination hearing statement has been prepared by Savills on behalf of Richborough.
- 1.2. Richborough is one of the UK's leading independent land promoters. Richborough use their land, planning and commercial expertise to identify sites and secure planning permission on behalf of landowners, delivering buildable schemes in the most efficient manner.
- 1.3. Richborough has entered into a promotion agreement with landowners Pennard Bare Trust and Ulvir Limited, who control part of the proposed allocation reference: B3 - West Redbourn, Redbourn, AL3 7HZ. The area of land controlled is c.12.1 hectares and has at times been referred to as Land West of Tassell Hall, Redbourn.
- 1.4. Richborough provided a response to the Regulation 19 consultation on the Local Plan, which is examination document reference: SADC/ED60.
- 1.5. Richborough have entered into a statement of common ground with St Albans City and District Council, which is examination document reference: SADC/ED26. Among other matters this statement of common ground states that the Council and Richborough generally support what is set out in the Local Plan Part A and what is set out in the Local Plan Part B, including the Key Development Requirements for Site B3.
- 1.6. This examination hearing statement responds only to the questions considered relevant to Richborough's land interest within the Matters, Issues and Questions for Stage 2, which is examination document reference: SADC/ED84.
- 1.7. Where appropriate, this response comments on the proposed modifications relevant to B3 - West Redbourn, as submitted by the Council and given examination document references: SADC/ED85A, SADC/ED85B and SADC/ED85C.
- 1.8. In this response just the questions set by the Inspectors are reproduced in bold text and the response on behalf of Richborough is in unbold text.

2. 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?

- 2.1. Yes, the scale of development is appropriate and proportionate to the scale, role and function of Redbourn.
- 2.2. It has been established in the submitted local plan that the largest settlements in the District are St Albans City and Harpenden, followed in size by London Colney, then the two large villages of Redbourn and Wheathampstead, and numerous smaller villages and hamlets.
- 2.3. Redbourn has a district centre, schools, community facilities and employment at the settlement.
- 2.4. It is considered that Redbourn is justified being placed in Tier 4 Large Village, in the settlement hierarchy.
- 2.5. Policy B3 is West Redbourn which is proposed, under modifications put forward by the Council, to be identified with a minimum capacity of 545 dwellings. This is a reduction in the minimum from 593 dwellings as contained in the submitted Local Plan.

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

- 2.6. Yes, the site can accommodate the number of homes proposed, which is a proposed minimum number of homes.
- 2.7. The area of land identified in the submitted Local Plan under Policy B3 is some 27 hectares.
- 2.8. The area of land is contained within the District and it partly adjoins Dacorum Borough.
- 2.9. The proposed uses for Policy B3 within Part B of the Local Plan, as proposed under modifications from the Council, is 'primarily residential 545 units (indicative)'.
- 2.10. There is a planning application registered under reference: 5/2021/3631, on the southern part of the land area by Vistry Homes Limited for up to 300 dwellings, etc.
- 2.11. Richborough are preparing a planning application on the northern part of the land area which might be for some 250 dwellings, although this amount is not yet fixed.
- 2.12. In addition, there is land located near to Flamsteadbury Lane, which is within the proposed allocation B3 but is not within either the existing or emerging planning applications, which has potential for additional dwellings.

- 2.13. All planning applications within the land area of Policy B3 will need to demonstrate sufficient mitigation and open space, assessed against relevant development plan policy at the time of determination of each planning application. The Council is in control of this through the development management function.
- 2.14. The combined total of dwellings by Vistry and Richborough is around 550 and hence this is above the proposed minimum of 545 dwellings. This figure is both described by the Council as a minimum but also as indicative.
- 2.15. There is potential for the combined total dwellings by Vistry and Richborough to be over 550 and possibly at or above the as submitted minimum figure of 593 dwellings.

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?

- 2.16. The proposed allocation of B3, which is justified under the proposed spatial strategy and settlement hierarchy, is the justification for the proposed alteration to the Green Belt boundary.
- 2.17. The proposed boundary alteration is consistent with paragraph 148 e) and f) of the Framework.
- 2.18. The proposed boundary within the District is able to demonstrate that the Green Belt boundary will not need to be altered at the end of the plan period, as per paragraph e of the Framework.
- 2.19. However, this cannot be said for the land over the boundary in Dacorum Borough, which is not proposed in the Dacorum Local Plan to come out of the Green Belt for development. We acknowledge this is a matter for that local plan.
- 2.20. The boundary of the proposed Green Belt in this location i.e. west of Redbourn within the District, is clearly defined, using physical features that are readily recognisable and likely to be permanent.

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

- 2.21. Yes, exceptional circumstances exist to justify amending the Green Belt boundary in this location.
- 2.22. Paragraph 145 of the Framework states in part that Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process.
- 2.23. The proposal West of Redbourn is through the plan-making process, fully evidenced and justified.
- 2.24. The strategic policy-making authority i.e. the Council has demonstrated that it has examined fully all other reasonable options for meeting its identified need for development.

- 2.25. The strategic policies in the Local Plan, take into account the preceding paragraph in the Framework, and whether the strategy takes into account limbs a to c of paragraph 146.
- 2.26. The exceptional circumstances demonstrated within this local plan are applicable to the land over the border in Dacorum Borough, but East of the M1.

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

- 2.27. We consider this is one for the Council to comment on.

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

- 2.28. We consider this is one for the Council to comment on.

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?

- 2.29. The proposed development will have to demonstrate sufficient mitigation, for example in the form of Suitable Alternative Natural Greenspace, as discussed with stakeholders such as the Council and Natural England.

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?

- 2.30. We consider this is one for the Council to comment on.

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?

- 2.31. Safe and suitable access from the local highway network is capable of being achieved to different parts of the proposed allocation B3. For example, access is proposed by Vistry to their land control and access is proposed by Richborough to their land control.

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

- 2.32. Yes, policy B3 as originally submitted for examination is justified, effective and consistent with national planning policy.
- 2.33. There are aspects of the proposed modifications to Policy B3 from the Council, which are questionable and we have not been able to fully assess the evidence for the proposed modifications to the policy.
- 2.34. Proposed 0A is that 70-80 self-contained housing with care units (these units are included within the indicative dwellings figure) is now proposed for this allocation.
- 2.35. The proposed modification does not appear to be justified or effective in that the wording is open to interpretation.
- 2.36. Proposed Policy HOU3 Specialist Housing, defines housing with support as retirement living or sheltered housing in the Framework and Use Class C3. These terms are not defined in the Framework.
- 2.37. Proposed Policy HOU3 Specialist Housing, defines housing with care as extra care housing or housing with care in the Framework and Use Class C3 or C2. These terms are not defined in the Framework.
- 2.38. Therefore, it is not clear how the proposed modification here is justified or effective.
- 2.39. The proposed modification to the new 2FE primary school is inclusion of a site and contributions, to serve the new and wider community. This is not evidenced and hence questionable as to whether this is justified and effective. We might look to discuss this aspect of policy B3 at the examination hearing with a specialist advisor.
- 2.40. Proposed1A. is that a childcare setting capable of providing 30 places including 0-2 year olds, is provided under this proposed allocation. This is not explained and hence it is difficult to see how this can be justified or effective.
- 2.41. Proposed1B. is the delivery of / contribution to the provision of essential transport infrastructure, including mitigating the impact of traffic associated with the development, and appropriate consideration of M1 Junction 9 interchange.
- 2.42. This is not explained in terms of evidence of assessment of the junction, a costed and timely scheme for works and how new residential development should contribute proportionally to the works.
- 2.43. The M1 junction 9 interchange proposal needs greater evidence and scrutiny.

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