

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?

- 1.1 Yes, it is considered that the scale of development proposed is appropriate and proportionate to the scale, role and function of Redbourn. Within the Settlement Hierarchy set out at Table 1.3 of LPCD 02.01 - Reg 19 Local Plan Part A (2024), Redbourn is classified as a Tier 4 Large Village, the key characteristics of which are:

Smaller population size compared to Small Town

Relatively self-contained settlements with provision of key services and employment sites

Functional relationship with Harpenden for higher order services

Availability of bus routes to provide public transport offer

- 1.2 Redbourn has a significant range of services and facilities that support the functioning of the settlement. The village has a high street with a range of shops, along with public houses, cafes and restaurants. There is a primary school, GP surgery, dentists, places of worship and extensive sports facilities at Redbourn Leisure Centre. The village also has a dedicated employment area at Redbourn Industrial Estate.

- 1.3 The Settlement Hierarchy Part 1 (2023) (LPCD 13.01) Appendix 2 shows that Redbourn has 2,124 existing homes.

- 1.4 LPCD 13.01 sets out that:

4.20 Redbourn is a village located five miles to the northwest of St Albans with a population of approximately 5,000 residents. Redbourn is described as retaining a unique and unspoiled village character, with a village centre including a relatively limited range of shops and services.

4.21 Redbourn is located in close proximity to Junction 9 of the M1, and is only around a 15 minute drive to Luton Airport. Rail (Thameslink) services are available at the railway station in neighbouring Harpenden around three miles east. The Nickey Line (closed branch railway line) now features a public footpath and cycle path.

- 1.5 Site B3 is assessed in the Green Belt Sites Recommended Broad Location Proformas (2024) (LPSS 02.04), with two sites in LPSS 02.04 making up the totality of B3 - C-096 and C-098, and the qualitative assessment for each include the following:

C-096

...

Part of the site is recommended for further consideration by the Green Belt Review Stage 2 Report.

...

This site adjoins Redbourn which is a Tier 4 settlement. The site could be brought forward as part of a co-ordinated cluster with C-098. If combined with site C-098, they offer a wide range of significant Economic, Environmental and Social benefits including a 2FE primary school, a significant scale of sustainable transport improvements and jobs.

C-098

...

The site is recommended for further consideration by the Green Belt Review Stage 2 Report.

...

This site adjoins Redbourn which is a Tier 4 settlement. The site could be brought forward as part of a co-ordinated cluster with C-096. If combined with site C-096, they offer a wide range of significant Economic, Environmental and Social benefits including a 2FE primary school, a significant scale of sustainable transport improvements and jobs.

- 1.6 For the Green Belt sites, justification for the assumption of 40 dwellings per hectare (dph) density is set out in the HELAA report (paragraph 3.30), with reference to the Council's previous Residential Density Report 2014. The 40dph is consistent and does not change to account for different density of adjacent development, in order to ensure efficient use of land and to minimise the amount of Green Belt land that is released. This is in line with the approach in the NPPF 2023 which sets out that, where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.
- 1.7 The Housing and Economic Land Availability Assessment (HELAA) report 2021 (HELAA 01.01) sets out:

3.31 This simple 40 dph calculation makes no specific allowance for infrastructure and major open space in larger development areas. To take into account allowances for infrastructure on larger sites, the Residential Density Report sets out only 60% of the site will be considered usable for residential, with 40% would be required to provide infrastructure, main roads, open space and public facilities.
- 1.8 The scale of development at Site B3 is therefore overall supported by the majority of the land being recommended for further consideration by the Green Belt Review (2024) and the location next to a Tier 4 settlement. The density of development is consistent with the standard approach of the new Local Plan, while the site provides the opportunity for additional benefits including a 2FE primary school, a significant scale of sustainable transport improvements and jobs.

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

- 2.1 Yes, taking into account the need for relevant mitigation and open space, it is considered that the site can accommodate the number of homes proposed.
- 2.2 The developable area and commensurate number of homes for B3 have been reduced to take account of the site constraints and relevant mitigations. These constraints include a motorway buffer along the west of the site to reduce noise and air pollution effects on the housing. There is also a reduction to take account of the setting and significance of the heritage assets of the Grade I Listed Parish Church of St Mary and the Redbourn Conservation Area. Furthermore, 2.03 hectares was removed for a 2FE primary school. The overall impact is that while the site is 27 ha in size, the standard calculation for homes was carried out on only 22.7 ha. The effect on the proposed number of indicative homes is to reduce this from 648 to 545.
- 2.3 The standard calculation approach to development on Broad Location sites such as B3 is that only 60% of the site will be considered usable for residential purposes, with 40% required to provide infrastructure, main roads, open space and public facilities. This will provide sufficient land to accommodate the open spaces requirements that are set out in the policies of Part A. Policy LG1 – Broad Locations states:

Proposals within the defined Broad Locations (or unallocated windfall development at this scale) must:

o) Provide new or provide contributions to enhance existing strategic, sports facilities, local and recreational public open space, including managed woodland and ecological network links;

- 2.4 Policy NEB12 - Green Space Standards and New Green Space Provision sets out the requirements for development that sites of the scale of B3 will be expected to meet on site.
- 2.5 Furthermore, Part B Site B3 requires the following key development requirement:

7. Access to and improvements to the existing Flamsteadbury Park children's play area must be provided.

- 2.6 The number of homes proposed is calculated based on the 60% of site area discussed above combined with an assumption of 40 dwellings per hectare (dph). The Housing and Economic Land Availability Assessment (HELAA) report 2021 (HELAA 01.01) sets out:

3.31 This simple 40 dph calculation makes no specific allowance for infrastructure and major open space in larger development areas. To take into account allowances for infrastructure on larger sites, the Residential Density Report sets out only 60% of the site will be considered usable for residential, with 40% would be required to provide infrastructure, main roads, open space and public facilities.

- 2.7 The 40 dph is consistent and does not change to account for different density of adjacent development, in order to ensure efficient use of land and to minimise the amount of Green Belt land that is released. This is in line with the approach in the NPPF 2023 which sets out that, where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.

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?

What is the justification for the proposed alteration to the Green Belt boundary?

- 3.1 The primary justification is the need to deliver the housing requirements set out in the Plan, which is seeking to meet the 'Standard Method' for housing in full. There is also the need to deliver a range of other associated infrastructure and community facilities.

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?

- 3.2 Yes, the proposed boundary alteration is considered to be consistent with paragraph 148 e) and f) which states:

148. When defining Green Belt boundaries, plans should:

...

e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and

f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

- 3.3 The Green Belt Review Report GB 02.02 (2023) set out a clear approach to defining sub-area boundaries based on NPPF paragraph 143. (N.B The Green Belt Review Report GB 02.02 refers to NPPF paragraph 143 based on the NPPF 2021. This is the same as the NPPF paragraph 148 in the 2023 version). This is set out in section 4.3.

- 3.4 Potential Green Belt boundaries were considered in the Green Belt Review Proforma Annex Report GB 02.03 (2023). For this site, relating to sub-areas SA-1, SA-3a and SA-3b, they were:

SA-1

Consideration of Boundaries

Commentary on boundary features and impact on Green Belt boundary strength

The inner and outer boundaries are readily recognisable and likely to be permanent. If the sub-area was released, the new inner Green Belt boundaries would meet the NPPF definition.

Categorisation & Recommendation

Sub-area category & recommendation

The sub-area performs strongly against NPPF purposes but makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would meet the NPPF definition for readily recognisable and likely to be permanent boundaries. Recommended for further consideration in isolation as RA-1 or in combination with SA-2 or SA-3a, as well as the wedge of Green Belt to the east of the sub-area and west of residential properties on Tassell Hall, as RC-1.

SA-3a

Consideration of Boundaries

Commentary on boundary features and impact on Green Belt boundary strength

The inner boundary and outer boundary to the west of the sub-area are readily recognisable and likely to be permanent. The outer boundaries to the north, north-east and south are predominantly recognisable but not necessarily permanent. If the sub-area was released, the new inner Green Belt boundary to the west would meet the NPPF definition; however, the remaining new inner Green Belt boundaries would not meet the NPPF definition. The new boundary would require strengthening.

Categorisation & Recommendation

Sub-area category & recommendation

The sub-area performs strongly against NPPF purposes but makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would not meet the NPPF definition for readily recognisable and likely to be permanent boundaries. The new boundary would require strengthening. Recommended for further consideration in isolation as RA-3 (including the Tassel Hall allotments to the east of the sub-area), or in combination with SA-2 and SA-1 as RC-1.

SA-3b

Consideration of Boundaries

Commentary on boundary features and impact on Green Belt boundary strength

The outer boundaries are predominantly readily recognisable but not necessarily permanent. If the sub-area was released, the new inner Green Belt boundaries would not meet the NPPF definition. The new boundary would require strengthening.

Categorisation & Recommendation

Sub-area category & recommendation

The sub-area performs strongly against NPPF purposes and makes an important contribution to the wider Green Belt. Not recommended for further considerations.

- 3.5 Relevant considerations are also set out in the EDH 05.01 - Landscape Visual Impact Appraisals Broad Locations SADC Local Plan Sites (2024). Pages 40 and 41 set out:

West Redbourn

The site's northern boundary is defined by Lybury Lane and an access track that runs between Lybury Lane and Nichols Farm. The eastern boundary abuts the settlement edge of Redbourn. The western boundary is defined by the M1 corridor, and the southern boundary is defined by Gaddesden Lane.

Settlement Form + Edge Character

- *The northern site boundary is defined by Lybury Lane and a farm access track – these are open highways with the exception of a hedgerow along the eastern edge of the lane.*
- *The existing settlement edge of Redbourn abuts the eastern site boundary – predominantly comprising the back gardens of residential properties.*
- *The M1 corridor and its associated cuttings/embankments/gantries and vegetation in combination with the pylon line and easement are located along the western edge.*

- 3.6 There are effectively four new proposed Green Belt boundaries in the Plan, which are:

Northern boundary – Lybury Lane and unclassified private road

North Eastern boundary – well-established hedgerow and tree belt

Western boundary – M1 corridor

Southern boundary – Gaddesden Lane

- 3.7 Overall, it is considered that the proposed boundary alteration will not need to be altered at the end of the Plan period, and has clearly defined boundaries 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?

- 4.1 Yes, it is considered that exceptional circumstances do exist to justify amending the Green Belt boundary in this location.
- 4.2 The strategic case to amend Green Belt boundaries is set out in answer to Stage 1 Matter 3, Issue 3, Question 1 and as addressed in GB 01.01 Green Belt and Exceptional Circumstances – Evidence Paper (2024) which sets out in paragraph 7.2 that:

The local context in which conclusions have been reached regarding the 'Exceptional Circumstances' necessary to require release of Green Belt land involves a variety of factors, including:

- The acuteness/intensity of the housing need.*
- The inherent constraints on supply/availability of non-Green Belt land.*
- The difficulties of delivering sustainable development without impinging on the Green Belt.*
- The nature and extent of the harm to the Green Belt that would arise if the boundaries were to be altered as proposed.*
- The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonable practicable extent.*

4.3 The evidence paper goes on to say in paragraph 7.3 that:

The Council has concluded that 'Exceptional Circumstances' do exist and it is necessary to amend Green Belt boundaries as set out in the draft Local Plan and its Policies Map. This includes amendments to facilitate both primarily residential and primarily employment land.

4.4 In relation to the specific case in this location, West Redbourn, Redbourn, AL3 7HZ, the specific localised Green Belt impacts are well understood because of the findings GB 02.02 Green Belt Review (2023) and GB 02.03 Green Belt Review Annex Proforma Report (2023). The Green Belt Review assessment of this site is comprised of multiple sub-area proforma assessments in this location. GB 02.03 relating to sub-areas SA-1, SA-3a and SA-3b, states:

SA-1

Purpose Assessment

Summary

The sub-area performs strongly against the purposes overall. The sub-area does not meet purpose 1 criteria (a) or purpose 4, performs weakly against purpose 2 and performs strongly against purpose 3.

Wider Green Belt Impacts

Summary

Overall, the sub-area plays an important role with respect of the strategic land parcel, however its release in isolation or in combination with SA-2 and SA-3a is unlikely to significantly harm the performance of the wider Green Belt.

Sub-area category & recommendation

The sub-area performs strongly against NPPF purposes but makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would meet the NPPF definition for readily recognisable and likely to be permanent boundaries. Recommended for further consideration in isolation as

RA-1 or in combination with SA-2 or SA-3a, as well as the wedge of Green Belt to the east of the sub-area and west of residential properties on Tassell Hall, as RC-1.

SA-3a

Purpose Assessment

Summary

The sub-area performs strongly against the purposes overall. The sub-area does not meet purpose 1 criteria (a) or purpose 4, performs weakly against purpose 2, and performs strongly against purpose 3.

Wider Green Belt Impacts

Summary

Overall, the sub-area plays an important role with regards to the strategic land parcel, however if released in isolation or in combination with SA-1 and SA-2 is unlikely to significantly harm the performance of the wider Green Belt.

Sub-area category & recommendation

The sub-area performs strongly against NPPF purposes but makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would not meet the NPPF definition for readily recognisable and likely to be permanent boundaries. The new boundary would require strengthening. Recommended for further consideration in isolation as RA-3 (including the Tassel Hall allotments to the east of the sub-area), or in combination with SA-2 and SA-1 as RC-1.

SA-3b

Purpose Assessment

Summary

The sub-area performs strongly against the purposes overall. The sub-area does not meet purpose 1 criteria (a) or 4, performs weakly against purpose 2, and performs strongly against purpose 3.

Wider Green Belt Impacts

Summary

Overall, the sub-area plays a partially important role with regards to the strategic parcel, however if released in isolation or in combination is likely to significantly harm the performance of the wider Green Belt.

Sub-area category & recommendation

The sub-area performs strongly against NPPF purposes and makes an important contribution to the wider Green Belt. Not recommended for further considerations.

- 4.5 The site was considered in the round in the site selection work, which included contextualising and balancing the results of the Green Belt Review with other factors. For this location, the site selection outcome is set out in LPSS 02.04 Green Belt

Sites Recommended Broad Location Proformas (2024) site references C-096 and C-098, in particular in the Qualitative Assessment:

C-096

Part of the site is recommended for further consideration by the Green Belt Review Stage 2 Report.

...

This site adjoins Redbourn which is a Tier 4 settlement. The site could be brought forward as part of a co-ordinated cluster with C-098. If combined with site C-098, they offer a wide range of significant Economic, Environmental and Social benefits including a 2FE primary school, a significant scale of sustainable transport improvements and jobs.

The site is recommended to progress.

C-098

The site is recommended for further consideration by the Green Belt Review Stage 2 Report.

...

This site adjoins Redbourn which is a Tier 4 settlement. The site could be brought forward as part of a co-ordinated cluster with C-096. If combined with site C-096, they offer a wide range of significant Economic, Environmental and Social benefits including a 2FE primary school, a significant scale of sustainable transport improvements and jobs.

This site is recommended to progress.

- 4.6 Overall, the site selection work concluded that the site was recommended to progress, and the exceptional circumstances are considered to exist to justify amending the Green Belt boundary in this location.

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

- 5.1 The landscape impacts of the allocation have been considered in the evidence submitted to date. This includes:

- LPSS 02.04 - Green Belt Sites Recommended Broad Location Proformas (2024)
- GB 02.02 - Green Belt Review Report (2023)
- GB 02.03 - Green Belt Review Annex Proforma Report (2023)
- EDH 05.01 - Landscape Visual Impact Appraisals Broad Locations SADC Local Plan Sites (2024)
- EDH 09.01 - Herts Landscape Character Area Statements St Albans District

5.2 Relevant impact considerations are set out in the EDH 05.01 - Landscape Visual Impact Appraisals Broad Locations SADC Local Plan Sites (2024), which also draws upon EDH 09.01 - Herts Landscape Character Area Statements St Albans District.

5.3 EDH 05.01 sets out considerations regarding mitigation on page 6:

- ***Mitigate the impact of motorway/railway noise (B1, B3, B8, H2)***

29. Where railway lines/motorways are located within or in close proximity to a broad location, noise impact assessments should be carried out as required.

30. Noise mitigation should be positively planned for within the development layout and design, and not retrofitted. The use of unattractive utilitarian features such as earth bunds and acoustic fencing should be avoided in favour of landscape led solutions such as the arrangement of green infrastructure and open space, and the provision of strategic planting. Where utilitarian features cannot be avoided, they should be fully integrated within a high-quality and attractive landscaping scheme and their impact minimised by the use of locally distinct materials and detailing, and planting.

5.4 With regard to Designated Landscapes EDH 05.01 sets out the following for Site B3:

- *There is no intervisibility / or impact on setting of Chilterns National Landscape.*

5.5 EDH 05.01 provides a landscape character and visual appraisal for site B3. The following mitigation and enhancements for the site are set out:

STRATEGIC MEASURES

- *Respond to context and character.*
- *Retain and protect important landscape features and views.*
- *Create multifunctional green/blue infrastructure and open space networks for people and/or wildlife.*
- *Provide new structural native planting.*
- *Mitigate motorway noise*

SITE SPECIFIC MEASURES

- *Understand and respond to the locally distinct character of Redbourn's valued landscapes such as Redbourn Common and the River Ver. Consider the positive relationship between open space and built form.*
- *The site occupies the distinct open tract of land between the existing settlement edge and the M1 motorway corridor. The M1 corridor provides a logical limit, and sense of containment, to the extension of the settlement edge westwards.*

- *The northern most field parcel of the site wraps around a distinct cluster of farm buildings and associated grass paddocks (which abut Lybury Lane along their eastern edge). Due to the sloping topography of the field parcel (orientated away from the existing settlement edge and towards Lybury Lane), the absence of any development to the other (eastern) side of Lybury Lane, and the 'severing' effect of the open paddocks, the northern part of the site feels remote and disconnected from the existing settlement. In addition the development of this parcel may result in coalescence with the existing properties along Lybury Lane to the north, which in turn may result in ribbon development. The approach here will require careful consideration to conserve the rural character of Lybury Lane and setting of the existing settlement, avoid incremental encroachment along Lybury Lane and create a legible settlement gateway. Options include avoiding built development in this field parcel or creating a robust landscape buffer strip to accommodate layers of structural shrub/tree/woodland planting and provide a defensible edge to the Green Belt.*
- *From the wider area to the south, there are oblique views across the proposed development as it cascades across the elevated and sloping topography. Across the slopes consider layering bands of structural tree planting along the contours to help soften the roofscape in views towards the development.*
- *To the south, respect setting of Redbourn Conservation Area and Grade I Listed Parish Church of St Mary*
- *To the west, mitigate visual and noise effects of M1 embankment/cutting/gantries with new structural shrub/tree/woodland planting. Opportunity to provide a green pedestrian/cycle route along here.*
- *Consider opportunity for links with wider network of green infrastructure routes and assets such as Redbourn Common, Flamsteadbury Park, Tassel Hall Allotments to north. Opportunity to create green route through centre of site (north to south) connecting to Nickey Line in the south.*

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

- 6.1 Site B3 West Redbourn was assessed, along with all other proposed site allocations, through the screening process carried out by SADCs SFRA Level 1 Addendum (2024) (EDH 02.01). The results from the SFRA screening assessment for site B3 are set out in the Flood Risk Sequential and Exception Test 2024 (SET) (SADC/ED64) in Appendix 1 - Sequential Test for Sites Considered for Regulation 19 Allocation:

The site is entirely in fluvial Flood Risk Zone 1. The Surface Water Flood Risk is a small proportion of the site. As such, there is no need to consider alternative sites in Flood Zone 1.

- 6.2 The proportion of the site B3 with surface water flood risk is 2%. As The Flood Risk Addendum – July 2025 (Examination Document SADC/ED77) sets out in the conclusions, paragraph 7.3 that:

In terms of the risk of surface water flooding, the SRFA Level 1 Addendum states that 'it is not anticipated that the sequential test for surface water would normally require alternative sites at lower risk to be considered, because the widespread and dendritic nature of surface water flood risk differs conceptually to river and sea flood risk.' and that 'in some circumstances, for example, for relatively small sites that are potentially substantially affected by surface water, alternative sites may be considered.' On this basis the approach to surface water flood risk for larger sites for the sequential test is that this type of flood risk can be managed on site through design and layout, and mitigation measures such as SuDS. It should be noted that surface water flood risk comprises less than 10% at each Broad Location site.

- 6.3 As a site of 27 hectares West Redbourn can therefore be considered suitable to manage surface water flood risk on site.
- 6.4 No groundwater flood risk was identified at this site by the SFRA Level 1 Addendum (2024).

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?

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?

- 7.1 The effects of development at West Redbourn, Redbourn, AL3 7HZ (B3) on the Chilterns Beechwoods Special Area of Conservation (CBSAC) have been considered in the Habitats Regulations Assessment 2024 (LPCD.04.01) (HRA). The HRA sets out in 'Table 3: LP Site Allocation Test of Likely Significant Effects' 'HRA Implications' that the allocation has the 'Potential for Likely Significant Effect'. It also sets out that any adverse impacts on the integrity of the site can be avoided and/or mitigated by adherence to the Council's Mitigation Strategy.
- 7.2 As set out in the Local Plan Part A Policy SP1 and SP10 the Local Plan supports:

Protection and enhancement of the Chilterns Beechwoods Special Area of Conservation (CBSAC);

Make appropriate contributions towards the Strategic Access Management and Monitoring Strategy (SAMMS), where the proposal is for additional housing within the Chilterns Beechwoods Special Area of Conservation (CBSAC) Zone of Influence (ZOI). Such development proposals will also need to make provision for a new Suitable Alternative Natural Greenspace (SANG), or alternatively contribute towards the maintenance of a suitable SANG project elsewhere;

- 7.3 In the emerging planning application (5/2021/3631) the applicant for B3 - Vistry - is seeking to deliver its own solution for the SANG requirements (and the solution will have considerable 'excess capacity' that may potentially be used by other sites as well). Vistry had identified land for a SANG in Dacorum, but the change of use from agricultural to SANG was refused by DBC's committee and it has since been appealed. The Appeal scheme for the SANG was approved in late September 2025.
- 7.4 The effect of development at West of Redbourn on the Chilterns Beechwoods Special Area of Conservation (CBSAC) and the approach to mitigation are considered in the HRA as follows:

Table 2: LP Policies Test of Likely Significant Effects

LG1 – Broad Locations

No.

This is a development management policy relating to broad locations of development. There are no realistic linking impact pathways present.

- 7.5 HRA Table 3: LP Site Allocation Test of Likely Significant Effects sets out in relation to Allocation B3:

Notes

Primarily residential 544 units (indicative) and care home development.

HRA Implications

Potential for Likely Significant Effect.

Located within the 12.6km core recreational Zone of Influence of Chilterns Beechwoods SAC.

- 7.6 The HRA identifies in Section 5.3 'In Combination Assessment' that the allocation could potentially result in a Likely Significant Effect upon the SAC in combination.
- 7.7 The HRA also sets out in Section 6.1 'Recreational Pressure' paragraph 6.1.1 that this allocation is part of the suite of policies and allocations that "...all provide for new residential development within the 12.6km core recreational ZOI and as such could provide a linking impact pathway to Chilterns Beechwoods SAC via increased recreational pressure (in combination) as a result of increased population living in the new dwellings provided by the LP."
- 7.8 The HRA then goes on to consider the mitigation measures in the Draft Plan, as follows:

6.1.2 No further analysis is necessary or possible given the strategic work already undertaken. Rather the focus of appropriate assessment needs to be on mitigation in the form of the available SANG capacity and its provision.

6.1.3 Paragraph 10.8 of the LP acknowledges this issue. It states:

6.1.4 “10.8... A buffer Zone of Influence of 12.6km around this covers part of St Albans District, and the Council is legally required not to issue decisions within this buffer until appropriate mitigation is secured through a Mitigation Strategy. A key element in the Mitigation Strategy will be the identification and/ or creation of Suitable Alternative Natural Greenspace (SANG) to draw people away from using the SAC.

6.1.6 In addition, suitable policy wording of the Local Plan is included within Strategic Policy SP10 to ensure that any windfall development that falls within the 12.6km core recreational ZOI does not result in a likely significant effect and also adheres to the forthcoming Mitigation Strategy.

7.9 The HRA then goes on to consider the St Albans Strategic Mitigation Strategy, including the following:

6.1.11 St Albans DC has been working with Natural England and partner authorities (Buckinghamshire Council, Central Bedfordshire Council and Dacorum Borough Council) in preparing the Chilterns Beechwoods SAC Mitigation Strategy. As the landowner, the National Trust has also been involved. The agreed Mitigation Strategy comprises of two parts, the Strategic Access Management and Monitoring Strategy (SAMMS), and Suitable Alternative Natural Greenspace (SANG) provision. The SAMMS addresses issues within the SAC itself. The interventions required have been identified and agreed. A range of projects will be implemented over a period of at least 80 years, (2022/23 to 2102/2103) by the National Trust. To fund the SAMMS, each new home built located within the ZOI within St Albans are required to pay a tariff of £828.6146 (subject to change). The SANG provision will provide alternative natural greenspace for recreation to divert recreational activities away from the SAC. All new residential development within the ZOI must contribute towards either a) a new (bespoke) SANG or b) contribute towards suitable SANG projects elsewhere; this is in addition to contributions towards the SAMMS. Larger developments (10 or more new homes) must provide their own suitable SANG that meets the guidance from Natural England. Smaller developments (1-9 homes) can contribute towards an existing SANG.

6.1.12 As previously detailed the SAMMS element of the Mitigation Strategy has been agreed by Natural England, which leaves only the SANG provision for the development planned by the St Albans Local Plan that requires further analysis. This is provided in the following paragraphs.

7.10 The HRA then goes on to consider SANG Provision to Support the Local Plan, including in relation to B3 as follows:

6.1.19 The Council expects any scheme to provide 10 or more dwellings within the ZOI to provide their own bespoke SANG. This requirement is outlined in the Chilterns Beechwoods SAC Mitigation Strategy as agreed in the Council's Policy Committee March 2023⁴⁷. Any SANG will need to be delivered in line with Natural England's SANG Criteria and agreed with Natural England to ensure the SANG is provided to an appropriate standard.

6.1.20 The Council's draft housing trajectory document identifies that allocation B3 is expected to complete its first dwellings in 2031/2032 (70 dwellings), ...

6.1.21 At the time of writing (September 2024), a planning application has been submitted to the Council for the southern portion of allocation B3 to deliver 300 dwellings (planning application number 5/2021/3631) (the full allocation is for a total of 545 dwellings). The potential SANG for this site is located within Dacorum. It is located circa 1700m west of the allocation site, joined by Gaddesden Lane. The applicants have submitted an application to Dacorum Council for a change of use from agricultural land to SANG for the proposed SANG site (Dacorum planning application number 5/2024/1397). It is possible that this application will not be decided for several months; however, the advanced nature of this application demonstrates the applicant's intention to provide SANG for this development.

7.11 The HRA concludes:

7.1.5 The Local Plan contains suitable policy wording to ensure that any allocations and any windfall development that falls within the 12.6km core recreational ZOI does not result in a likely significant effect and also adheres to the forthcoming Mitigation Strategy.

7.1.6 Following an analysis of the current position relating to the availability, deliverability and timing of SANG provision in relation to the expected delivery time frames for residential development, it was concluded that, whilst not all allocations have a SANG strategy identified, those without a SANG solution in place are not to be occupied until at least year 6 of the Local Plan. The Council has confirmed that they are confident that appropriate SANG solutions will be delivered for all of the relevant sites within the Local Plan. This confidence is in part demonstrated by the Council's commitment to the Chilterns Beechwoods SAC Mitigation Strategy as agreed in the Council's Policy Committee March 2023. It is considered that with the Chilterns Beechwood SAC Mitigation Strategy in place, and the Council's confidence to deliver SANG in a timely fashion, (acknowledging the excess SANG capacity at Hemel Garden Communities), that no adverse effects on the integrity of the Chilterns Beechwoods SAC would result.

7.12 It is considered that the potential effects of the development at B3 on the CBSAC have been suitably considered in the HRA and in the Plan, and that they will be appropriately mitigated as a result, through provision of SANG onsite and contributions towards SAMMS, as set out in the Plan.

- 7.13 This position is supported by Natural England, as set out in the Statement of Common Ground between SADC and Natural England (SADC/ED24), where it states:

Mitigating the impact of development on Chiltern Beechwoods SAC

- *12.6km Zone of Influence announced by Natural England where mitigation for new residential development will be required with SANGs and SAMMs.*
- *Strategic matter between:*
 - o *SADC*
 - o *Dacorum Borough Council*
 - o *Central Bedfordshire Council*
 - o *Buckinghamshire Council*
 - o *Natural England*

Conclusion

SADC and NE both support the approach in SADC's Regulation 19 draft Local Plan to mitigating the impact of development on the Chiltern Beechwoods SAC.

- 7.14 Taking the above into account, it is considered that the potential effects of the development at B3 on the CBSAC have been suitably considered in the HRA and in the Plan, and that they will be appropriately mitigated as a result, through provision of SANG onsite and contributions towards SAMMS, as set out in the Plan. It is also noted that the Council's approach in this regard is supported by Natural England.

Can mitigation be provided on site?

- 7.15 This is set out in paragraphs 6.1.19 - 6.1.22 in the HRA (2024) which are provided above in the first part of this question response. The following paragraph of the HRA is also relevant:

6.1.25 Whilst not all allocations have a SANG strategy identified, those without a SANG solution in place are not to be occupied until at least year 6 of the Local Plan. The Council has confirmed that they are confident that appropriate SANG solutions will be delivered for all of the relevant sites within the Local Plan. This confidence is in part demonstrated by the Council's commitment to the Chilterns Beechwoods SAC Mitigation Strategy as agreed in the Council's Policy Committee March 2023. It is considered that with the Chilterns Beechwood SAC Mitigation Strategy in place, and the Council's confidence to deliver SANG in a timely fashion, (acknowledging the excess SANG capacity at Hemel Garden Communities), that no adverse effects on the integrity of the Chilterns Beechwoods SAC would result.

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?

- 8.1 The effect of development on the setting of the Grade I listed Parish Church of St Mary and the Redbourn Conservation Area have been taken into account in the allocation of the site through the undertaking of a Heritage Impact Assessment and through the related policy requirements.
- 8.2 The strategy for undertaking Heritage Impact Assessments (HIAs) for certain sites was summarised in EDH 04.01 - Heritage Impact Assessment Draft Cover Report (2024) as follows:

2. Background

2.1. Prior to the Regulation 18 Draft Local Plan Consultation, which ran from July to September 2023, the Council identified that a number of the proposed site allocations could impact on the historic environment by affecting the setting of nearby heritage assets. At that stage it had not provided site-specific HIAs as part of its evidence base, but the intention was for these to be undertaken to a proportionate degree ahead of the Regulation 19 Plan.

2.2. The Regulation 18 Consultation Historic England (HE) response concurred with the Council's intention to produce proportionate site-specific HIAs to inform the Regulation 19 Plan. HE advised that the purpose of the HIAs will be to identify any heritage assets which could be affected by development of a given site, to consider their significance (including any contribution made by their setting), and assess the impact that any proposed development might have on the significance of those assets. HE suggested that the best way to explore options for mitigation is through the preparation of site-specific HIAs; particularly for large strategic sites or sites where there are particularly significant heritage issues e.g. highly graded heritage asset either on site or in close proximity. HE made clear that it is a question of proportionality; the bigger the site or the more important the heritage issues, the more evidence they would expect to see.

2.3. Through ongoing dialogue with HE it was established that a total of 52no. of the Regulation 19 allocation sites should be subject to the Council's Heritage Impact Assessment 2024, and the Council appointed Essex Place Services to undertake the longer and more detailed assessments. The proportionate approach agreed with HE resulted in the following HIA work being undertaken:

...

a) Detailed Site Assessments undertaken by Essex Place Services for the following 8no. sites:

...

- B3 - West Redbourn, Redbourn, AL3 7HZ*

- 8.3 As such, this site was one of the 8no. sites subject of Detailed Site Assessments undertaken by Essex Place Services, recognising the potential heritage impact of the

allocation. This HIA is at EDH 04.03 - Heritage Impact Assessment Appendix 2 B3 West of Redbourn (2024).

- 8.4 Section 5 of the HIA sets out the 'Potential Impact of Development' with three sub-sections focusing respectively on potential impacts on the Designated Heritage Assets of Redbourn Conservation Area, St Mary's Church and Flower's Farmhouse; and potential impacts in relation to Archaeology.
- 8.5 The HIA's 'Conclusions and Recommendations' section reads as follows:

6. Conclusions and Recommendations

6.1 This Heritage Impact Assessment has been prepared by Place Services for Site B3 West of Redbourn to provides an assessment of heritage impact for the Allocation of Site B3 ('the Site') as referred to in the Local Plan.

Design Recommendations & Mitigation

6.2 If the potential Allocation progresses, detailed discussions with the Local Planning Authority should be undertaken at an early stage as appropriate, with a detailed Heritage Impact Assessment defining the impact on all heritage assets within proximity to the Site required at planning application stage. This should consider how attempts to avoid or minimise harm to the asset have been explored, for example reducing housing density and the creation of open space to the south of the Site closest to the Church and Conservation Area boundary. There is greater scope to increase housing density to the north of the Site which makes a lesser contribution to the significance of these assets.

6.3 This assessment has identified that there is the potential for archaeological deposits to survive within the Site and these should be assessed by an appropriate desk-based assessment and geophysical survey supported by trial trenching if required. The results of these investigations may further inform the development proposal.

6.4 At planning application stage, an archaeological desk-based assessment will be required for the Site and this will need to be followed by non-intrusive and potentially intrusive evaluation to support and inform a planning application. Early consultation with the Local Planning Authority is recommended, as appropriate.

- 8.6 It is considered that heritage protection in line with the above is suitably secured through the requirement in Policy LG1 q) and the allocation Key development requirement 5; as follows:

LG1 – Broad Locations

Proposals within the defined Broad Locations (or unallocated windfall development at this scale) must:

...

q) For sites listed in Appendix 5, be informed by a detailed Heritage Impact Assessment and Archaeological Desk-Based Assessment which address the recommendations of the Council's Heritage Impact Assessment 2024;

...

Key development requirements

5. Through Masterplanning, the layout and design of development should minimise any harm to the setting and significance of the Grade I Listed Parish Church of St Mary and the Redbourn Conservation Area; this may include the incorporation of appropriate set backs of development.

- 8.7 It should be noted that further discussion with Historic England in relation to their Regulation 19 comments for this site resulted in agreement that no change is required for soundness, and that the aforementioned Key development requirement plus the relevant policy in chapters 3, 11 and 12 of Part A would provide an appropriate degree of protection. This is set out at M12I1Q7 - Appendix 2 - SoCG SADC and HE October 2025 and M12I1Q7 - Appendix 3 - HE Comments and Agreed Mods October 2025.
- 8.8 Taking the above into account, the effect of development on the setting of the Grade I listed Parish Church of St Mary and the Redbourn Conservation Area have been taken into account in the allocation of the site through the undertaking of a Heritage Impact Assessment and through the related policy requirements. It is also noted that the Council's approach for this site has the agreement of Historic England.

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?

Can a safe and suitable access to the site be achieved?

- 9.1 Yes, it is considered that a safe and suitable to the site can be achieved.
- 9.2 A Transport Impact Assessment (TIA) was completed for the site which informed the Local Plan by considering the impacts of developing the site in transport terms, and what mitigations (if any) are required. This included whether sustainable transport modes can be taken up, given the type of development and its location; whether safe and suitable access to the site can be achieved for all users; and whether any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.
- 9.3 It is important to note that HCC as the Highway Authority and Transport Authority directly contributed to all the TIAs and agreed the contents in regards to a safe and suitable access.

- 9.4 The TIA for the site in INF 09.05 – Transport Impact Assessment Appendix 1 Redbourn (2024) includes:

3. Access Strategy

The site has access onto Gaddesden Lane, Lybury Lane and Flamsteadbury Lane. A Local Transport Plan (LTP) compliant access strategy allowing safe access for all modes is deliverable..

...

Conclusion

...

The site will be making significant contributions to sustainable travel for Redbourn. An LTP compliant access strategy allowing safe access for all modes is deliverable. The Comet Model Forecast shows that traffic impacts generated from the site and cumulative traffic in the area can be mitigated to a degree that can be acceptable regarding the NPPF test of 'severe' regarding congestion and safety. Overall there are 'no showstoppers'.

Is it sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?

- 9.5 It is important to note that HCC as the Highway Authority and Transport Authority directly contributed to all the TIAs and agreed the contents. HCC also agreed what would comprise the necessary highway improvements and where and how they would be delivered. As set out in SADC/ED85B and SADC/ED85C this includes HCCs agreement to some small scale Main Modifications to the highways and public rights of way requirements.
- 9.6 The necessary highway improvements are made clear to users of the Plan in the key development requirements of the site allocation which are set out in LPCD 02.02 – Reg 19 Local Plan Part B (2024) and further amended for clarity in Main Modifications in SADC/ED85B and SADC/ED85C and state:

Key development requirements

...

- 1B. 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. Delivery of / Contributions /enhancements to support relevant schemes in the LCWIP and GTPs as indicated in the TIA. Including but not limited to improvements to the A5183 route between Redbourn and St Albans, and improvements to the Nickey Line and onward connection to Harpenden.
3. Provision of links and ~~support for~~ improvements via delivery or contributions to the Nickey Line as an active travel corridor. Right of Way improvement contribution to the link under the M1 and out into the wider recreational network to the West. The network of Public Rights of Way must be retained and

enhanced to encourage local walkers and dog walkers to use local routes into the wider countryside.

4. ~~Support for improvements~~ Improvements via delivery or contributions to enable direct walking and cycling routes into Redbourn to ensure that walking and cycling are the most attractive methods of travelling into Redbourn.

- 9.7 Overall, the key development requirements alongside policies including LG1 – Broad Locations, SP14 – Delivery of Infrastructure and IMP1 – Additional Infrastructure Requirements for Strategic Scale Development are considered sufficiently clear about where and how they would be delivered.

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

- 10.1 Yes, it is considered that Policy B3 is justified, effective and consistent with national planning policy.
- 10.2 As answered above in Policy B3 M7I5Q4, Policy B3 is considered to be justified as the general need for Green Belt release as set out in GB 01.01 - Green Belt and Exceptional Circumstances Evidence Paper (2024).
- 10.3 GB 02.02 - Green Belt Review Report (2023) recommended areas to be considered further for Green Belt release. As set out above in Policy B31 M7I5Q4 the Green Belt Review assessments can be found in GB 02.03 - Green Belt Review Annex Proforma Report (2023).
- 10.4 The site was considered in the round in the site selection work, which included contextualising and balancing the results of the Green Belt Review with other factors. For this location, the site selection outcome is set out across a proforma assessment (Sites ref C-096 and C-098) in LPSS 02.04 - Green Belt Sites Recommended Broad Location Proformas (2024).
- 10.5 Policy B3 is effective as the Council has engaged with the landowner(s) of the site and has continued joint working as appropriate with relevant bodies including, HCC, the Environment Agency, Historic England and Natural England. This is set out in the agreed Statements of Common Ground / EA Updated response to Local Plan Reg 19:
- SADC/ED3 - Statement of Common Ground between SADC and Hertfordshire County Council
 - SADC/ED65 – Appendix 7.2: Environment Agency updated response to Regulation 19
 - SADC/ED23 - Statement of Common Ground between SADC and Historic England

- SADC/ED24 - Statement of Common Ground between SADC and Natural England

- 10.6 Policy B3 is consistent with national policy as set out in the evidence base in its totality, including in particular the Green Belt Review and the Site Selection process LPSS 01.01 - Local Plan Site Selection Methodology Outcomes and Site Allocations (23 Sep 2024).
- 10.7 Overall, Policy B3 is considered to be justified, effective and consistent with national planning policy. We are of the view that it is an entirely appropriate allocation (in the context of the chosen spatial strategy) and is deliverable.
- 10.8 N.B. Policy B3 includes proposed Main Modifications as set out in SADC/ED85B and SADC/ED85C.

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?

- 1.1 Yes, it is considered that the scale of development proposed appropriate and proportionate to the scale, role and function of Redbourn. Within the Settlement Hierarchy set out at Table 1.3 of LPCD 02.01 - Reg 19 Local Plan Part A (2024), Redbourn is classified as a Tier 4 Large Village, the key characteristics of which are:

Smaller population size compared to Small Town

Relatively self-contained settlements with provision of key services and employment sites

Functional relationship with Harpenden for higher order services

Availability of bus routes to provide public transport offer

- 1.2 Redbourn has a significant range of services and facilities that support the functioning of the settlement. The village has a high street with a range of shops, along with public houses, cafes and restaurants. There is a primary school, GP surgery, dentists, places of worship and sports facilities at Redbourn Leisure Centre. The village also has a dedicated employment area at Redbourn Industrial Estate.
- 1.3 The Settlement Hierarchy Part 1 (2023) (LPCD 13.01) Appendix 2 shows that Redbourn has 2,124 existing homes.
- 1.4 LPCD 13.01 sets out that:

4.20 Redbourn is a village located five miles to the northwest of St Albans with a population of approximately 5,000 residents. Redbourn is described as retaining a unique and unspoiled village character, with a village centre including a relatively limited range of shops and services.

4.21 Redbourn is located in close proximity to Junction 9 of the M1, and is only around a 15 minute drive to Luton Airport. Rail (Thameslink) services are available at the railway station in neighbouring Harpenden around three miles east. The Nickey Line (closed branch railway line) now features a public footpath and cycle path.

- 1.5 Site M6 is assessed in the Green Belt Sites Recommended Medium & Small Site Proformas (2024) (LPSS 02.06) as site M-016 with the qualitative assessment including the following:

The site is recommended for further consideration by the Green Belt Review Stage 2 Report.

...

The site is adjacent to Redbourn, a Tier 4 Settlement in the Settlement Hierarchy. The whole site is within the Green Belt. It is within the 250 metres Green Belt Study settlement buffer.

- 1.6 It should be noted that the scale of development in relation to the size of the site has been considerably reduced to take account of the environmental factors on the site. While the total site comprises 12 hectares, development is proposed on just 2 hectares with the remaining 10 hectares being removed due to constraints of flood risk, mature trees, TPO trees, and other retained uses. This results in a proposed number of indicative units of 68.
- 1.7 The scale of development at Site M6 is therefore overall supported by the majority of the land being recommended for further consideration by the Green Belt Review (2024), the location next to a Tier 4 settlement, and the number of proposed units reduced to a realistic level.

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?

What is the justification for the proposed alteration to the Green Belt boundary?

- 2.1 The primary justification is the need to deliver the housing requirements set out in the Plan, which is seeking to meet the 'Standard Method' for housing in full. There is also the need to deliver a range of other associated infrastructure and community facilities.

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?

- 2.2 Yes, the proposed boundary alteration is considered to be consistent with paragraph 148 e) and f) which states:

148. When defining Green Belt boundaries, plans should:

...

e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and

f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

- 2.3 The Green Belt Review Report GB 02.02 (2023) set out a clear approach to defining sub-area boundaries based on NPPF paragraph 143. (N.B The Green Belt Review Report GB 02.02 refers to NPPF paragraph 143 based on the NPPF 2021. This is the same as the NPPF paragraph 148 in the 2023 version). This is set out in section 4.3.
- 2.4 Potential Green Belt boundaries were considered in the Green Belt Review Proforma Annex Report GB 02.03 (2023) which for this site, relating to sub-area SA-8, were:

Consideration of Boundaries

Commentary on boundary features and impact on Green Belt boundary strength

The inner and outer boundaries of the sub-area are readily recognisable and likely to be permanent. If the sub-area was released, the new inner Green Belt boundary would meet the NPPF definition.

Categorisation & Recommendation

Sub-area category & recommendation

The sub-area performs weakly against the NPPF purposes and makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would meet the NPPF definition for readily recognisable and likely to be permanent boundaries. Recommended for further consideration in isolation as RA-4.

- 2.5 There are effectively two new proposed Green Belt boundaries in the Plan, which are:

Northern boundary – Harpenden Lane

Eastern boundary – Nickey Line cyclepath (former railway line)

- 2.6 Overall, it is considered that the proposed boundary alteration will not need to be altered at the end of the Plan period, and has clearly defined boundaries using physical features that are readily recognisable and likely to be permanent.

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

- 3.1 Yes, it is considered that exceptional circumstances do exist to justify amending the Green Belt boundary in this location.
- 3.2 The strategic case to amend Green Belt boundaries is set out in answer to Stage 1 Matter 3, Issue 3, Question 1 and as addressed in GB 01.01 Green Belt and Exceptional Circumstances – Evidence Paper (2024) which sets out in paragraph 7.2 that:

The local context in which conclusions have been reached regarding the 'Exceptional Circumstances' necessary to require release of Green Belt land involves a variety of factors, including:

- The acuteness/intensity of the housing need.*
- The inherent constraints on supply/availability of non-Green Belt land.*
- The difficulties of delivering sustainable development without impinging on the Green Belt.*
- The nature and extent of the harm to the Green Belt that would arise if the boundaries were to be altered as proposed.*
- The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonable practicable extent.*

- 3.3 The evidence paper goes on to say in paragraph 7.3 that:

The Council has concluded that 'Exceptional Circumstances' do exist and it is necessary to amend Green Belt boundaries as set out in the draft Local Plan and its Policies Map. This includes amendments to facilitate both primarily residential and primarily employment land.

- 3.4 In relation to the specific case in this location, South of Harpenden Lane, Redbourn, AL3 7RQ, the specific localised Green Belt impacts are well understood because of the findings GB 02.02 Green Belt Review (2023) and GB 02.03 Green Belt Review Annex Proforma Report (2023). The Green Belt Review assessment of this site is comprised of multiple sub-area proforma assessments in this location. GB 02.03 relating to sub-area SA-8, states:

Purpose Assessment

Summary

The sub-area performs weakly against the purposes overall. The sub-area does meet purpose 1 criteria (a) or purpose 4 and performs weakly against purposes 2 and 3.

Wider Green Belt Impacts

Summary

Overall, the sub-area does not play an important role with respect to the strategic parcel, and if released in isolation is unlikely to significantly harm the performance of the wider Green Belt.

Sub-area category & recommendation

The sub-area performs weakly against the NPPF purposes and makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would meet the NPPF definition for readily recognisable and likely to be permanent boundaries. Recommended for further consideration in isolation as RA-4.

- 3.5 The site was considered in the round in the site selection work, which included contextualising and balancing the results of the Green Belt Review with other factors. For this location, the site selection outcome is set out under site reference M-016 in LPSS 02.06 Green Belt Sites Recommended Medium and Small Site Proformas (2024). This is set out in particular in the Qualitative Assessment:

The site is recommended for further consideration by the Green Belt Review Stage 2 Report.

...

This site is recommended to progress.

- 3.6 Overall, the site selection work concluded that the site was recommended to progress, and the exceptional circumstances are considered to exist to justify amending the Green Belt boundary in this location.

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?

Can a safe and suitable access to the site be achieved?

- 4.1 Yes, it is considered that a safe and suitable to the site can be achieved.
- 4.2 A Transport Impact Assessment (TIA) was completed for the site which informed the Local Plan by considering the impacts of developing the site in transport terms, and what mitigations (if any) are required. This included whether sustainable transport modes can be taken up, given the type of development and its location; whether safe and suitable access to the site can be achieved for all users; and whether any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

- 4.3 It is important to note that HCC as the Highway Authority and Transport Authority directly contributed to all the TIAs and agreed the contents in regards to a safe and suitable access.
- 4.4 The TIA for the site in INF 09.05 – Transport Impact Assessment Appendix 1 Redbourn (2024) includes:

3. Access Strategy

Proposals must demonstrate how the site will be accessed effectively from Redbourn safely for pedestrians and cyclists without the need for direct access to the A5183. There is a reasonable prospect that a Local Transport Plan (LTP) compliant access strategy allowing safe access for all modes is deliverable.

...

Conclusion

...

The site will be making significant contributions to sustainable travel for Redbourn. There is a reasonable prospect that an LTP compliant access strategy allowing safe access for all modes is deliverable.

The Comet Model Forecast shows that traffic impacts generated from the site and cumulative traffic in the area can be mitigated to a degree that can be acceptable regarding the NPPF test of 'severe' regarding congestion and safety.

Overall there are 'no showstoppers'.

Is it sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?

- 4.5 It is important to note that HCC as the Highway Authority and Transport Authority directly contributed to all the TIAs and agreed the contents. HCC also agreed what would comprise the necessary highway improvements and where and how they would be delivered. As set out in SADC/ED85B and SADC/ED85C this includes HCCs agreement to some small scale Main Modifications to the highways and public rights of way requirements.
- 4.6 The necessary highway improvements are made clear to users of the Plan in the key development requirements of the site allocation which are set out in LPCD 02.02 – Reg 19 Local Plan Part B (2024) and further amended for clarity in Main Modifications in SADC/ED85B and SADC/ED85C and state:

Key development requirements

...

3. Delivery of / Contributions / enhancements to support relevant schemes in the LCWIP and GTPs as indicated in the TIA.

5. Support for Improvements via delivery or contributions to enhanced connectivity of the Nickey Line into Redbourn and onwards to Harpenden would be welcomed, including improvements to access / crossings and to surfacing / lighting where

appropriate. This should be considered in line with GTP / LCWIP schemes and the Nickey Line Greenspace Action Plan.

- 4.7 Overall, the key development requirements alongside policies including LG4 – Large, Medium and Small Sites and SP14 – Delivery of Infrastructure are considered sufficiently clear about where and how they would be delivered.

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

- 5.1 Site M6 South of Harpenden Lane was assessed, along with all other proposed site allocations, through the screening process carried out by SADCs SFRA Level 1 Addendum (2024) (EDH 02.01). The results from the SFRA screening assessment for site M6 are set out in the *Flood Risk Sequential and Exception Test 2024 (SET)* (SADC/ED64) in Appendix 1 - Sequential Test for Sites Considered for Regulation 19 Allocation:

There is significant fluvial flood risk within all flood zones at the eastern side of the site. There is also significant area at risk of Surface Water Flooding. The Exception Test is required.

- 5.2 The SET shows 16% of the site is within Flood Zone 2 and 13% within Flood Zone 3a.
- 5.3 The *Flood Risk Sequential and Exception Test 2024 (SET)* (SADC/ED64) in Appendix 2 - Exception Test sets out for site M6:

The site is predominantly in Flood Zone 1. Development can be restricted to Flood Zone 1, following a sequential approach to layout and a proportionate reduction in the quantum of housing deliverable on site.

The Surface Water Flood Risk should be managed through approaches set out in the SFRA L2 recommendations.

The site will also support the delivery of sustainable growth in the context of SADC having a large need for new delivery of new housing and will therefore meet the District's wider sustainability objectives.

As such, there is no need to consider alternative sites in Flood Zone 1.

- 5.4 The key development requirements in the Reg 19 Local Plan Part B (2024) (LPCD 02.02) set out that:

Proposals must take account of the fact that approximately half of the site is in Flood Zone 3 and there must be no built form within the area of Flood Zone 3b. There must be no residential development outside Flood Zone 1 and the Exception Test is required for this site because there is significant fluvial flood risk within all flood zones at the eastern side of the site and the development type is 'vulnerable'.

- 5.5 The proportion of the site M6 with surface water flood risk is 22%. As The Flood Risk Addendum – July 2025 (Examination Document SADC/ED77) sets out in the conclusions, paragraph 7.3 that:

In terms of the risk of surface water flooding, the SRFA Level 1 Addendum states that 'it is not anticipated that the sequential test for surface water would normally require alternative sites at lower risk to be considered, because the widespread and dendritic nature of surface water flood risk differs conceptually to river and sea flood risk.' and that 'in some circumstances, for example, for relatively small sites that are potentially substantially affected by surface water, alternative sites may be considered.' On this basis the approach to surface water flood risk for larger sites for the sequential test is that this type of flood risk can be managed on site through design and layout, and mitigation measures such as SuDS.

- 5.6 As a site of 12.04 ha Land South of Harpenden Lane can therefore be considered suitable to manage surface water flood risk on site.
- 5.7 The site is 12.04 ha in size, but the standard calculation for homes was carried out on only 1.7 ha to allow for flooding (and other eg tree) constraints on the site. The effect on the proposed number of indicative homes is to reduce the capacity from 288 to 68.
- 5.8 Groundwater flood risk at a depth of less than 0.025m was identified across 51% of this site by the SFRA Level 1 Addendum (2024). This area of groundwater flood risk is within the 10.34 ha (86%) of the total site area of 12.04 ha not due to be built on.

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?

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?

- 6.1 The effects of development at South of Harpenden Lane, Redbourn (M6) on the Chilterns Beechwoods Special Area of Conservation (CBSAC) have been considered in the Habitats Regulations Assessment 2024 (LPCD.04.01) (HRA). The HRA sets out in 'Table 3: LP Site Allocation Test of Likely Significant Effects' 'HRA Implications' that the allocation has the 'Potential for Likely Significant Effect'. It also sets out that any adverse impacts on the integrity of the site can be avoided and/or mitigated by adherence to the Council's Mitigation Strategy.
- 6.2 As set out in the Local Plan Part A Policy SP1 and SP10 the Local Plan supports:

Protection and enhancement of the Chilterns Beechwoods Special Area of Conservation (CBSAC);

Make appropriate contributions towards the Strategic Access Management and Monitoring Strategy (SAMMS), where the proposal is for additional housing within the Chilterns Beechwoods Special Area of Conservation (CBSAC) Zone of Influence (ZOI). Such development proposals will also need to make provision for a new Suitable Alternative Natural Greenspace (SANG), or alternatively contribute towards the maintenance of a suitable SANG project elsewhere;

- 6.3 The effect of development at M6 on the Chilterns Beechwoods Special Area of Conservation (CBSAC) and the approach to mitigation are considered in the HRA as follows:

Table 2: LP Policies Test of Likely Significant Effects

LG4 – Large, Medium and Small Sites

No

This is a development management policy relating to large, medium and small sites. There are no realistic linking impact pathways present

- 6.4 HRA Table 3: LP Site Allocation Test of Likely Significant Effects sets out in relation to Allocation M6:

Notes

Housing 68 units (indicative)

HRA Implications

Potential for Likely Significant Effect.

Located within the 12.6km core recreational Zone of Influence of Chilterns Beechwoods SAC.

- 6.5 The HRA identifies in Section 5.3 'In Combination Assessment' that the allocation could potentially result in a Likely Significant Effect upon the SAC in combination.
- 6.6 The HRA also sets out in Section 6.1 'Recreational Pressure' paragraph 6.1.1 that this allocation is part of the suite of policies and allocations that "...all provide for new residential development within the 12.6km core recreational ZOI and as such could provide a linking impact pathway to Chilterns Beechwoods SAC via increased recreational pressure (in combination) as a result of increased population living in the new dwellings provided by the LP."
- 6.7 The HRA then goes on to consider the mitigation measures in the Draft Plan, as follows:

6.1.2 No further analysis is necessary or possible given the strategic work already undertaken. Rather the focus of appropriate assessment needs to be on mitigation in the form of the available SANG capacity and its provision.

6.1.3 Paragraph 10.8 of the LP acknowledges this issue. It states:

6.1.4 “10.8... A buffer Zone of Influence of 12.6km around this covers part of St Albans District, and the Council is legally required not to issue decisions within this buffer until appropriate mitigation is secured through a Mitigation Strategy. A key element in the Mitigation Strategy will be the identification and/ or creation of Suitable Alternative Natural Greenspace (SANG) to draw people away from using the SAC.

6.1.6 In addition, suitable policy wording of the Local Plan is included within Strategic Policy SP10 to ensure that any windfall development that falls within the 12.6km core recreational ZOI does not result in a likely significant effect and also adheres to the forthcoming Mitigation Strategy.

- 6.8 The HRA then goes on to consider the St Albans Strategic Mitigation Strategy, including the following:

6.1.11 St Albans DC has been working with Natural England and partner authorities (Buckinghamshire Council, Central Bedfordshire Council and Dacorum Borough Council) in preparing the Chilterns Beechwoods SAC Mitigation Strategy. As the landowner, the National Trust has also been involved. The agreed Mitigation Strategy comprises of two parts, the Strategic Access Management and Monitoring Strategy (SAMMS), and Suitable Alternative Natural Greenspace (SANG) provision. The SAMMS addresses issues within the SAC itself. The interventions required have been identified and agreed. A range of projects will be implemented over a period of at least 80 years, (2022/23 to 2102/2103) by the National Trust. To fund the SAMMS, each new home built located within the ZOI within St Albans are required to pay a tariff of £828.6146 (subject to change). The SANG provision will provide alternative natural greenspace for recreation to divert recreational activities away from the SAC. All new residential development within the ZOI must contribute towards either a) a new (bespoke) SANG or b) contribute towards suitable SANG projects elsewhere; this is in addition to contributions towards the SAMMS. Larger developments (10 or more new homes) must provide their own suitable SANG that meets the guidance from Natural England. Smaller developments (1-9 homes) can contribute towards an existing SANG.

6.1.12 As previously detailed the SAMMS element of the Mitigation Strategy has been agreed by Natural England, which leaves only the SANG provision for the development planned by the St Albans Local Plan that requires further analysis. This is provided in the following paragraphs.

- 6.9 The HRA then goes on to consider SANG Provision to Support the Local Plan, including in relation to M6 and the view of Natural England as follows:

6.1.19 The Council expects any scheme to provide 10 or more dwellings within the ZOI to provide their own bespoke SANG. This requirement is outlined in the Chilterns Beechwoods SAC Mitigation Strategy as agreed in the Council's Policy Committee March 2023⁴⁷. Any SANG will need to be delivered in line with Natural England's SANG Criteria and agreed with Natural England to ensure the SANG is provided to an appropriate standard.

6.1.20 The Council's draft housing trajectory document identifies that allocation B3 is expected to complete its first dwellings in 2031/2032 (70 dwellings), ...

6.1.21 At the time of writing (September 2024), a planning application has been submitted to the Council for the southern portion of allocation B3 to deliver 300 dwellings (planning application number 5/2021/363148) (the full allocation is for a total of 545 dwellings). The potential SANG for this site is located within Dacorum. It is located circa 1700m west of the allocation site, joined by Gaddesden Lane. The applicants have submitted an application to Dacorum Council for a change of use from agricultural land to SANG for the proposed SANG site (Dacorum planning application number 5/2024/1397). It is possible that this application will not be decided for several months; however, the advanced nature of this application demonstrates the applicant's intention to provide SANG for this development.

6.10 The HRA concludes:

7.1.5 The Local Plan contains suitable policy wording to ensure that any allocations and any windfall development that falls within the 12.6km core recreational ZOI does not result in a likely significant effect and also adheres to the forthcoming Mitigation Strategy.

7.1.6 Following an analysis of the current position relating to the availability, deliverability and timing of SANG provision in relation to the expected delivery time frames for residential development, it was concluded that, whilst not all allocations have a SANG strategy identified, those without a SANG solution in place are not to be occupied until at least year 6 of the Local Plan. The Council has confirmed that they are confident that appropriate SANG solutions will be delivered for all of the relevant sites within the Local Plan. This confidence is in part demonstrated by the Council's commitment to the Chilterns Beechwoods SAC Mitigation Strategy as agreed in the Council's Policy Committee March 2023. It is considered that with the Chilterns Beechwood SAC Mitigation Strategy in place, and the Council's confidence to deliver SANG in a timely fashion, (acknowledging the excess SANG capacity at Hemel Garden Communities), that no adverse effects on the integrity of the Chilterns Beechwoods SAC would result.

6.11 It is considered that the potential effects of the development at M6 on the CBSAC have been suitably considered in the HRA and in the Plan, and that they will be appropriately mitigated as a result, through provision of SANG onsite and contributions towards SAMMS, as set out in the Plan.

6.12 This position is supported by Natural England, as set out in the Statement of Common Ground between SADC and Natural England (SADC/ED24), where it states:

Mitigating the impact of development on Chiltern Beechwoods SAC

- 12.6km Zone of Influence announced by Natural England where mitigation for new residential development will be required with SANGs and SAMMs.*
- Strategic matter between:*

- o SADC
- o Dacorum Borough Council
- o Central Bedfordshire Council
- o Buckinghamshire Council
- o Natural England

Conclusion

SADC and NE both support the approach in SADC's Regulation 19 draft Local Plan to mitigating the impact of development on the Chiltern Beechwoods SAC.

- 6.13 Taking the above into account, it is considered that the potential effects of the development at M6 on the CBSAC have been suitably considered in the HRA and in the Plan, and that they will be appropriately mitigated as a result, through provision of SANG onsite and contributions towards SAMMS, as set out in the Plan. It is also noted that the Council's approach in this regard is supported by Natural England.

Can mitigation be provided on site?

- 6.14 No, it is understood that mitigation is unlikely to be provided on site as there is insufficient land that meets the necessary characteristics for a SANG to be provided on site.

- 6.15 As set out in paragraph 6.1.22 of the Habitats Regulations Assessment 2024 (LPCD.04.01):

... The applicant for allocation M6 is in the process of identifying its own SANG site. ... However, as detailed in the Hemel Garden Communities discussion above, it is understood that there is likely to be excess capacity within the Hemel Garden Communities SANG, and this is anticipated to be the primary SANG to support the St Albans District Local Plan.

- 6.16 Whilst still in process, the indications are that there may be likely excess capacity within the Hemel Garden Communities SANG and therefore potential capacity to support SANG for this site.
- 6.17 There is also now a SANG within Dacorum that has been recently allowed on Appeal, that is controlled by the housebuilder Vistry, that is associated with a planning application for M2 West of Redbourn, that has significant excess SANG capacity and may be available.

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

- 7.1 Yes, it is considered that Policy M6 is justified, effective and consistent with national planning policy.

- 7.2 Policy M6 is justified as the general need for Green Belt release as set out in GB 01.01 - Green Belt and Exceptional Circumstances Evidence Paper (2024). Paragraph 7.2 states:

The local context in which conclusions have been reached regarding the 'Exceptional Circumstances' necessary to require release of Green Belt land involves a variety of factors, including:

- *The acuteness/intensity of the housing need.*
- *The inherent constraints on supply/availability of non-Green Belt land.*
- *The difficulties of delivering sustainable development without impinging on the Green Belt.*
- *The nature and extent of the harm to the Green Belt that would arise if the boundaries were to be altered as proposed.*
- *The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonable practicable extent.*

- 7.3 GB 02.02 - Green Belt Review Report (2023) recommended areas to be considered further for Green Belt release. As set out above in Policy M6 M7I5Q3 the Green Belt Review assessments can be found in GB 02.03 - Green Belt Review Annex Proforma Report (2023).

- 7.4 The site was considered in the round in the site selection work, which included contextualising and balancing the results of the Green Belt Review with other factors. For this location, the site selection outcome is set out across a proforma assessment (Site ref M-016) in LPSS 02.06 - Green Belt Sites Recommended Medium & Small Site Proformas (2024) and as set out in Policy M6 M7I5Q3.

- 7.5 As set out in Policy B1 M7I1Q1 above, the Site Selection process set out in LPSS 02.04 - Green Belt Sites Recommended Broad Location Proformas (2024) assessed site B1 for potential allocation in the Plan and recommended the site to progress.

- 7.6 Policy M6 is effective as the Council has engaged with the landowner(s) of the site and has continued joint working as appropriate with relevant bodies including, HCC, the Environment Agency, Historic England and Natural England. This is set out in the agreed Statements of Common Ground / EA Updated response to Local Plan Reg 19:

- SADC/ED3 - Statement of Common Ground between SADC and Hertfordshire County Council
- SADC/ED65 – Appendix 7.2: Environment Agency updated response to Regulation 19
- SADC/ED23 - Statement of Common Ground between SADC and Historic England
- SADC/ED24 - Statement of Common Ground between SADC and Natural England

- 7.7 Policy M6 is consistent with national policy as set out in the evidence base in its totality, including in particular the Green Belt Review and the Site Selection process LPSS 01.01 - Local Plan Site Selection Methodology Outcomes and Site Allocations (23 Sep 2024).
- 7.8 Overall, Policy M6 is considered to be justified, effective and consistent with national planning policy. We are of the view that it is an entirely appropriate allocation (in the context of the chosen spatial strategy) and is deliverable.
- 7.9 N.B. Policy M6 includes proposed Main Modifications as set out in SADC/ED85B and SADC/ED85C.

Policy P3 – Friends Meeting House, Blackwater Lane, Hemel Hempstead

Q1 What is the justification for not seeking to amend the Green Belt boundary in this location? Can the allocation be deliverable whilst retained in the Green Belt? Is the allocation effective?

What is the justification for not seeking to amend the Green Belt boundary in this location?

- 1.1 The site is an existing large building with associated car parking. As such the site is identified as Previously Developed Land within the Green Belt. The site can therefore be developed without amending the Green Belt boundary.
- 1.2 The site does not adjoin an existing urban area. The Council's approach is to avoid punching holes in the Green Belt, which is an effect that would be created if the site were to be removed from the Green Belt.

Can the allocation be deliverable whilst retained in the Green Belt?

- 1.3 Yes, it is considered that the allocation can be delivered whilst being retained in the Green Belt.
- 1.4 The site was assessed through the site selection process with the details set out in the Green Belt Sites Recommended PDL Site Proformas (2024) (LPSS 02.07). The qualitative assessment states that:

The site is not recommended for further consideration by the Green Belt Review Stage 2 Report.

The site is relatively close to Hemel Hempstead, a Tier 1 Settlement in the Settlement Hierarchy. The whole site is within the Green Belt, but it is predominantly brownfield. It is partially within the 400 metres Green Belt Study Settlement buffer.

The site is approximately; 1.8 kilometres from a primary school, 3.2 kilometres from a secondary school, 170 metres from a bus stop, 4.3 kilometres from Aspley railway station and 1.2 kilometres from a Local Centre.

The site contains and is adjacent to areas of undesignated woodland. Individual trees and bushes are also present within the site.

An electrical substation is positioned along the sites north eastern boundary. The whole site falls within the Chiltern Beechwoods SAC Zone of Influence. Potential access is via an internal road leading onto Blackwater Lane.

The site is recommended to progress.

- 1.5 It can be additionally noted that significantly more facilities would be provided locally once HGC is built out, including a primary school, a secondary school and a Local Centre.

Is the allocation effective?

- 1.6 Yes, the allocation is considered to be effective. It is not considered that the retention of the Green Belt classification of this PDL site will prevent development from coming forward for development.

Q2 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?

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?

- 2.1 The effects of development at - Friends Meeting House, Blackwater Lane, Hemel Hempstead, HP3 8LB (P3) on the Chilterns Beechwoods Special Area of Conservation (CBSAC) have been considered in the Habitats Regulations Assessment 2024 (LPCD.04.01) (HRA). The HRA sets out in 'Table 3: LP Site Allocation Test of Likely Significant Effects' 'HRA Implications' that the allocation has the 'Potential for Likely Significant Effect'.
- 2.2 As set out in the Local Plan Part A Policy SP1 the Local Plan supports "*Protection and enhancement of the Chilterns Beechwoods Special Area of Conservation (CBSAC);*" and Policy SP10 sets out support for "*proposals that ensure the protection and improvement of the District's green infrastructure and the wider natural environment, where the proposals:*

...

Make appropriate contributions towards the Strategic Access Management and Monitoring Strategy (SAMMS), where the proposal is for additional housing within the Chilterns Beechwoods Special Area of Conservation (CBSAC) Zone of Influence (ZOI). Such development proposals will also need to make provision for a new Suitable Alternative Natural Greenspace (SANG), or alternatively contribute towards the maintenance of a suitable SANG project elsewhere;...”

- 2.3 HRA Table 3: LP Site Allocation Test of Likely Significant Effects sets out in relation to Allocation P3:

HRA Implications

Potential for Likely Significant Effect.

Located within the 12.6km core recreational Zone of Influence of Chilterns Beechwoods SAC.

The allocation states that: “Most of the site lies within the Chilterns Beechwoods Special Area of Conservation (CBSAC) Zone of Influence (ZOI). Appropriate contributions must be made towards the Strategic Access Management and Monitoring Strategy (SAMMS). Development proposals will also need to make provision for a new Suitable Alternative Natural Greenspace (SANG), or alternatively contribute towards the maintenance of a suitable SANG project elsewhere.’

- 2.4 ‘In Combination Assessment’ that the allocation could potentially result in a Likely Significant Effect upon the SAC in combination.
- 2.5 The HRA also sets out in Section 6.1 ‘Recreational Pressure’ paragraph 6.1.1 that this allocation is part of the suite of policies and allocations that “...all provide for new residential development within the 12.6km core recreational ZOI and as such could provide a linking impact pathway to Chilterns Beechwoods SAC via increased recreational pressure (in combination) as a result of increased population living in the new dwellings provided by the LP.”
- 2.6 The HRA then goes on to consider the mitigation measures in the Draft Plan, as follows:

6.1.2 No further analysis is necessary or possible given the strategic work already undertaken. Rather the focus of appropriate assessment needs to be on mitigation in the form of the available SANG capacity and its provision.

6.1.3 Paragraph 10.8 of the LP acknowledges this issue. It states:

6.1.4 “10.8... A buffer Zone of Influence of 12.6km around this covers part of St Albans District, and the Council is legally required not to issue decisions within this buffer until appropriate mitigation is secured through a Mitigation Strategy. A key element in the Mitigation Strategy will be the identification and/ or creation of Suitable Alternative Natural Greenspace (SANG) to draw people away from using the SAC.

6.1.6 In addition, suitable policy wording of the Local Plan is included within Strategic Policy SP10 to ensure that any windfall development that falls within the 12.6km core

recreational ZOI does not result in a likely significant effect and also adheres to the forthcoming Mitigation Strategy.

- 2.7 The HRA then goes on to consider the St Albans Strategic Mitigation Strategy, including the following:

6.1.11 St Albans DC has been working with Natural England and partner authorities (Buckinghamshire Council, Central Bedfordshire Council and Dacorum Borough Council) in preparing the Chilterns Beechwoods SAC Mitigation Strategy. As the landowner, the National Trust has also been involved. The agreed Mitigation Strategy comprises of two parts, the Strategic Access Management and Monitoring Strategy (SAMMS), and Suitable Alternative Natural Greenspace (SANG) provision. The SAMMS addresses issues within the SAC itself. The interventions required have been identified and agreed. A range of projects will be implemented over a period of at least 80 years, (2022/23 to 2102/2103) by the National Trust. To fund the SAMMS, each new home built located within the ZOI within St Albans are required to pay a tariff of £828.6146 (subject to change). The SANG provision will provide alternative natural greenspace for recreation to divert recreational activities away from the SAC. All new residential development within the ZOI must contribute towards either a) a new (bespoke) SANG or b) contribute towards suitable SANG projects elsewhere; this is in addition to contributions towards the SAMMS. Larger developments (10 or more new homes) must provide their own suitable SANG that meets the guidance from Natural England. Smaller developments (1-9 homes) can contribute towards an existing SANG.

6.1.12 As previously detailed the SAMMS element of the Mitigation Strategy has been agreed by Natural England, which leaves only the SANG provision for the development planned by the St Albans Local Plan that requires further analysis. This is provided in the following paragraphs.

- 2.8 The HRA then goes on to consider SANG Provision to Support the Local Plan, including in relation to site P3 as follows:

6.1.22 The applicant for allocation M6 is in the process of identifying its own SANG site. It is not known if the applicants for M7, M16 and P3 are currently looking for a SANG solution for their sites. However, as detailed in the Hemel Garden Communities discussion above, it is understood that there is likely to be excess capacity within the Hemel Garden Communities SANG, and this is anticipated to be the primary SANG to support the St Albans District Local Plan. Further, as identified above, it is noted that the housing trajectory document identifies that all these allocations are not due to be delivered until year 6 of the Plan or later. The Local Plan will be subject to review in year 5.

- 2.9 The HRA concludes:

7.1.5 The Local Plan contains suitable policy wording to ensure that any allocations and any windfall development that falls within the 12.6km core recreational ZOI does

not result in a likely significant effect and also adheres to the forthcoming Mitigation Strategy.

7.1.6 Following an analysis of the current position relating to the availability, deliverability and timing of SANG provision in relation to the expected delivery time frames for residential development, it was concluded that, whilst not all allocations have a SANG strategy identified, those without a SANG solution in place are not to be occupied until at least year 6 of the Local Plan. The Council has confirmed that they are confident that appropriate SANG solutions will be delivered for all of the relevant sites within the Local Plan. This confidence is in part demonstrated by the Council's commitment to the Chilterns Beechwoods SAC Mitigation Strategy as agreed in the Council's Policy Committee March 2023. It is considered that with the Chilterns Beechwood SAC Mitigation Strategy in place, and the Council's confidence to deliver SANG in a timely fashion, (acknowledging the excess SANG capacity at Hemel Garden Communities), that no adverse effects on the integrity of the Chilterns Beechwoods SAC would result.

2.10 It is considered that the potential effects of the development at P3 on the CBSAC have been suitably considered in the HRA and in the Plan, and that they will be appropriately mitigated as a result, through provision of SANG onsite and contributions towards SAMMS, as set out in the Plan.

2.11 This position is supported by Natural England, as set out in the Statement of Common Ground between SADC and Natural England (SADC/ED24), where it states:

Mitigating the impact of development on Chiltern Beechwoods SAC

- *12.6km Zone of Influence announced by Natural England where mitigation for new residential development will be required with SANGs and SAMMs.*
- *Strategic matter between:*
 - o SADC*
 - o Dacorum Borough Council*
 - o Central Bedfordshire Council*
 - o Buckinghamshire Council*
 - o Natural England*

Conclusion

SADC and NE both support the approach in SADC's Regulation 19 draft Local Plan to mitigating the impact of development on the Chiltern Beechwoods SAC.

2.12 Taking the above into account, it is considered that the potential effects of the development at P3 on the CBSAC have been suitably considered in the HRA and in the Plan, and that they will be appropriately mitigated as a result, through provision of SANG onsite and contributions towards SAMMS, as set out in the Plan. It is also noted that the Council's approach in this regard is supported by Natural England.

Can mitigation be provided on site?

2.13 No, it is understood that mitigation is unlikely to be provided on site as there is insufficient land that meets the necessary characteristics for a SANG to be provided on site.

2.14 As set out in paragraph 6.1.22 of the Habitats Regulations Assessment 2024 (LPCD.04.01):

... it is understood that there is likely to be excess capacity within the Hemel Garden Communities SANG, and this is anticipated to be the primary SANG to support the St Albans District Local Plan.

2.15 Whilst still in process, the indications are that there may be likely excess capacity within the Hemel Garden Communities SANG and therefore potential capacity to support SANG for this site.

2.16 There is also now a SANG within Dacorum that has been recently allowed on Appeal, that is controlled by the housebuilder Vistry, that is associated with a planning application for M2 West of Redbourn, that has significant excess SANG capacity and may be available.

Q3 Is Policy P3 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

3.1 Yes, it is considered that Policy P3 is justified, effective and consistent with national planning policy.

3.2 The Council's Approach to Green Belt PDL is set out in the 'Local Plan Evidence – Site Selection Methodology, Outcomes and Site Allocations' Paper (LPSS.01.01) as follows:

3.3. The Local Plan seeks to make the most effective and efficient use of land in the District and has undertaken an extensive and rigorous search for Previously Developed Land (PDL) (also known as 'Brownfield land' in national policy) within existing built-up areas. The approach has been underlain by the concept of 'leaving no stone unturned' in the search for appropriate sites on brownfield land. This extensive search has also included potential PDL opportunities in the Green Belt. However, an insufficient supply of Previously Developed Land led to the requirement to identify sites on Green Belt Land.

3.3 As set out in paragraph 3.1 of SADC/ED78 Green Belt PDL Sites - July 2025, site P3 is one of the three previously developed sites in the Green Belt allocated in the draft Local Plan, and:

The primary reason that these sites were allocated was that they were on those Green Belt HELAA sites which contained built development that was considered likely to meet the NPPF Annex 2 definition of 'Previously Developed Land'¹ ; sufficient to yield 5 or more homes (net) if applying the NPPF 2023 paragraph 154 g) PDL exception to inappropriate development in the Green Belt:

154. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are: ... g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: – not have a greater impact on the openness of the Green Belt than the existing development; or – not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

- 3.4 Secondly, there were no significant impediments to developing the site in terms of constraints or sustainability identified. The site was considered in the round in the site selection work. For this location, the site selection outcome is set out on pages 6 to 7 in LPSS 02.07 Green Belt Sites Recommended PDL Site Proformas (2024). This is set out in particular in the Qualitative Assessment:

The site is not recommended for further consideration by the Green Belt Review Stage 2 Report.

The site is relatively close to Hemel Hempstead, a Tier 1 Settlement in the Settlement Hierarchy. The whole site is within the Green Belt, but it is predominantly brownfield. It is partially within the 400 metres Green Belt Study Settlement buffer.

The site is approximately; 1.8 kilometres from a primary school, 3.2 kilometres from a secondary school, 170 metres from a bus stop, 4.3 kilometres from Aspley railway station and 1.2 kilometres from a Local Centre.

The site contains and is adjacent to areas of undesignated woodland. Individual trees and bushes are also present within the site.

An electrical substation is positioned along the sites north eastern boundary. The whole site falls within the Chiltern Beechwoods SAC Zone of Influence.

Potential access is via an internal road leading onto Blackwater Lane.

The site is recommended to progress.

- 3.5 Policy P3 is effective as the Council has engaged with the landowner(s) of the site and has continued joint working as appropriate with relevant bodies including, HCC, the Environment Agency, Historic England and Natural England. This is set out in the agreed Statements of Common Ground / EA Updated response to Local Plan Reg 19:

- SADC/ED3 - Statement of Common Ground between SADC and Hertfordshire County Council

- SADC/ED65 – Appendix 7.2: Environment Agency updated response to Regulation 19
- SADC/ED23 - Statement of Common Ground between SADC and Historic England
- SADC/ED24 - Statement of Common Ground between SADC and Natural England

3.6 Policy P3 is consistent with national policy as set out in the evidence base in its totality, including in particular the Site Selection process LPSS 01.01 - Local Plan Site Selection Methodology Outcomes and Site Allocations (23 Sep 2024) and SADC/ED78 Green Belt PDL Sites - July 2025.

3.7 Overall, Policy P3 is considered to be justified, effective and consistent with national planning policy. We are of the view that it is an entirely appropriate allocation (in the context of the chosen spatial strategy) and is deliverable.