



Redbourn Parish Council Representations

**St Albans Local Plan
Proposed Submission (Regulation 19)**

November 2024

CONTENTS

1.	Introduction	4
2.	Plan Period	6
	South West Hertfordshire Joint Strategic Plan	7
3.	Duty to Cooperate	10
	<i>South Hertfordshire Joint Strategic Plan SOCG</i>	11
4.	Sustainability Appraisal (SA)	14
	Noise and Air Quality	17
5.	Vision and Objectives	20
	Vision	20
	South West Hertfordshire Vision	21
	Objectives	22
6.	Spatial Strategy	23
	Policy SP1 (A Spatial Strategy for St Albans District)	23
	The Settlement Hierarchy	25
7.	Climate Emergency	37
	Policy SP2 (Responding to the Climate Emergency)	37
	Policy CE1 (Promoting Sustainable Design, Construction and Building Efficiency)	39
	Policy CE2 (Renewable and Low Carbon Energy)	39
8.	Housing Need and Requirement	40
9.	Exceptional Circumstances and Green Belt	41
	Exceptional Circumstances	41
	Green Belt Review	42
10	Strategic Policy LG1 (Broad Locations)	48
	Allocation B3 – West Redbourn	48
11	Policy LG2 (Support for Transformation of Hemel Hempstead)	54
	Green Belt	54
	Hemel Garden Communities Trajectory	59
	Development Lead in Times	60
	Housing Delivery Rates	64
	Infrastructure Delivery	65
	Transport Infrastructure	66
	Physical Infrastructure	68
	Viability	71
12	Policy LG3 (Hemel Garden Communities Growth Areas Place Principles)	74

13	Policy LG4 (Large, Medium and Small Sites)	75
	Site M6 South of Harpenden Lane, Redbourn	75
	UC33 Land Rear of 53 Snatchup, Redbourn	78
14	Policies SP4, HOU1, HOU2, HOU6 (Housing)	79
15	Employment	84
	South West Herts Economic Study (2024)	84
	Strategic Policy SP5 – Employment and the Local Economy	85
16	Transport	86
17	Policy NEB8 (Managing Flood Risk)	91
18	Policy LG5 (Green Belt)	93
19	Landscape	94
	West of Redbourn (Broad Location B3) Landscape and Visual Assessment	94
	North Hemel Hempstead Landscape Assessment (September 2024)	94
	Policy NEB10 – Landscape and Design	98
	Policy NEB11 – Chilterns National Landscape	99
20	Heritage	101
21	Agricultural Land	103
	Appendix A – Proposed Housing by Settlement	106
	Appendix B – ‘ <i>Start to Finish – How quickly do large-scale housing sites deliver</i> ’ 3 rd Edition, September 2024 (Lichfields)	111

These Representations are prepared and submitted on behalf of Redbourn Parish Council (RPC).

Redbourn Parish Council (RPC) confirms that it wishes to participate in the Local Plan Examination hearing sessions. Given the scale of strategic development proposed at Redbourn and Hemel Hempstead RPC considers it critical that it has the opportunity to provide further input into the Local Plan Examination process including the hearing sessions to elaborate on its representations, respond to other evidence and arguments put forward as part of the hearings and Examination.

1. Introduction

1.1 These representations provide a response, on behalf of Redbourn Parish Council (RPC), to the St Albans Draft Local Plan (Regulation 19).

1.2 RPC considers the Local Plan to not be legally compliant due to St Albans City and District Council's (SACDC) failure to discharge its Duty to Cooperate.

1.3 RPC considers the Local Plan's proposed spatial strategy and the proposed development within Redbourn Parish to be unsound as the plan fails all the tests of soundness set out in the National Planning Policy Framework (NPPF) (paragraph 35) which are set out below:

- **“Positively prepared** - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.”

We provide an overview of our conclusions on legality and soundness below which are expanded on in our detailed representations including our review and critique of key evidence base documents as well as the Sustainability Appraisal (SA).

<p>Policies/ Sections to which this relates:</p>	<ul style="list-style-type: none"> - Plan Period - Housing Trajectory - Vision and Objectives - Key Diagram - Policies Map - Green Belt Exceptional Circumstances - Agricultural Land - Policy SP1 (A Spatial Strategy for St Albans District) - Policy SP2 (Responding to the Climate Emergency) - Policy CE1 (Promoting Sustainable Design, Construction and Building Efficiency) - Policy CE2 (Renewable and Low Carbon Energy) - Policy SP3 (Land and the Green Belt) - Strategic Policy LG1 (Broad Locations) <ul style="list-style-type: none"> o Allocation B3 – West Redbourn - Policy LG2 (Support for Transformation of Hemel Hempstead) - Policy LG3 (Hemel Garden Communities Growth Areas Place Principles) - Policy LG4 (Large, Medium and Small Sites) <ul style="list-style-type: none"> o Site M6 South of Harpenden Lane, Redbourn - Strategic Policy SP4 (Housing) - Policy HOU1 (Housing Mix) - Policy HOU6 (Gypsies, Travellers and Travelling Showpeople) - Strategic Policy SP5 (Employment and the Local Economy) - Policy TRA2 (Major Transport Schemes) - Policy NEB8 (Managing Flood Risk) - Policy LG5 (Green Belt) - Policy NEB10 (Landscape and Design) - Policy NEB11 (Chilterns National Landscape) 				
<p>Legal Compliance and Duty to Cooperate</p>	<p>Soundness</p>			<p>Yes</p>	<p>No</p>
	<p>Yes</p>	<p>No</p>	<p>Justified</p>		<p>X</p>
<p>Legally Compliant?</p>		<p>X</p>	<p>Effective</p>		<p>X</p>
<p>Satisfies Duty to Cooperate?</p>		<p>X</p>	<p>Consistent with National policy</p>		<p>X</p>
			<p>Positively prepared</p>		<p>X</p>

2. Plan Period

- 2.1 The Draft Local Plan proposes a plan period of 2024/25 to 2040/41; however, it provides no justification for why this plan period has been selected. As we set out below SACDC has selected the very minimum plan period based on its current Local Development Scheme (Sep 2024) which does not appear to be adequate time to allow for the planning application and development process to take place as set out in the Local Plan's Housing Trajectory (Table 3.2 below).
- 2.2 The National Planning Policy Framework (NPPF) requires a minimum 15-year period from the adoption of the Local Plan. SACDC's LDS indicates a Local Plan adoption date of March 2026 so the minimum Local Plan period would end in March 2041. The proposed Draft Local Plan period would only be within the NPPF plan period requirement if it were indeed adopted by March 2026 which is a very narrow margin and assumes the Local Plan process (including examination) will stick to schedule with no margin for error. This is particularly relevant and concerning, as the Council admits in paragraph 3.5 of the Local Development Scheme that some aspects of the timetable are not within the control of the Council. Any delay in the adoption of the Local Plan would entail failure to comply with the 15-year rule of paragraph 22 NPPF.

	Regulation 18 Consultation	Regulation 19 Publication	Submission	Examination	Adoption
Local Plan	July – Sep 2023	Sep – Nov 2024	Dec 2024	Dec 2024 - Feb 2026	March 2026

Figure 2.1: Local Plan programme until adoption (Local Development Scheme, September 2024)

- 2.3 However, this assumes that the requirement for policies to be set within a vision that looks ahead at least 30 years imposed by paragraph 22 of the NPPF would not be required. The NPPF states:

"Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery."

- 2.4 There are clearly a number of options in the Draft Local Plan that do propose 'larger scale developments'. In this case, Local Plan policies should look further ahead and at least 30 years to account for the likely delivery time required for delivering strategic development. One need to look no further than the proposals at the 'Hemel Garden Communities' which, despite SACDC's optimistic development start dates and delivery rates, requires 750 dwellings to be delivered beyond the proposed plan period. In order to be effective and consistent with the NPPF, the Local Plan must extend its plan period to include the full development it is proposing.

2.5 Therefore, the plan and its policies clearly need to develop a vision which covers at least 30 years from the point of Local Plan adoption. If one assumes that the Local Plan adoption date is in 2025/26 then the policies and vision will need to extend to at least 2055/2056.

2.6 MHCLG introduced this change to the NPPF in response to the Building Better Building Beautiful Commission recommendations to clarify that councils need to take into account the likely timescale for delivery of larger scale developments which take considerable time to plan and deliver.

2.7 The proposed Draft Local Plan Housing Trajectory identifies broad locations for growth to be delivered from year 6 since the adoption of the Local Plan, until year 15 of the Local Plan. The trajectory also expects some smaller and specific sites to be delivered within the first 5-year period since the adoption of the Local Plan. However, the Local Plan only expects specific sites allocated in the Local Plan to be delivered in years 4 and 5. The expectation, according to the submitted trajectory, is that 482 new dwellings will be delivered in year 4 and 778 on year 5.

St Albans City and District Council - Regulation 19 Publication Local Plan Housing Trajectory (1 October 2024)

Category / Year	Past Completions			Estimated Completions		Years 1-5 (post adoption)					Years 6-10 (post adoption)					Years 11-15 (post adoption)					Total (2024/25 - 2040/41)	
	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41		
Permissions																						
Permissions (Past Completions)	314	401	385																			
Permissions (Estimated Future Completions)				478	507	258	310	190	202	110	100	100	100	91	20						2,365	
Permissions (Estimated Future Completions) - 8% Lapse Assumption				-38	-32	-22	-25	-15	-16	-9	-8	-8	-8	-7	-2						199	
Windfall Allowance						73	140	140	145	145	145	145	145	145	145	145	145	145	145	145	2,193	
Dependent NP Site Allocations									9	20	15	4									57	
Part B - Local Plan Site Allocations:																						
Hemel Garden Communities									100	175	250	325	360	365	365	440	490	500	495	465	4,280	
Broad Locations (250+ Homes)												240	500	500	500	500	500	497	354	280	232	4,077
Large Sites (100-249 Homes)												150	150	55	30						386	
Medium and Small Sites (15-99 Homes)									152	284	215	155	62	5							851	
Green Belt - Previously Developed Land									15	40	40	35	4								137	
Sites Within Urban Settlements (HELAA)									30	13											43	
Sites Within Urban Settlements (UCS)									188	286	183	83	57	40	25						860	
Part B - Local Plan Site Allocations (Total)									452	779	529	1,241	1,113	945	921	940	857	858	775	697	10,652	
Annual Housing Requirement				443	695	695	695	666	695	665	665	665	665	665	665	665	665	665	665	665	14,693	
Annual Housing Requirement (Stopped)				385	389	485	485	485	485	485	1,255	1,255	1,255	1,255	1,025	1,025	1,025	1,025	1,025	1,025	14,693	
Total Housing Land Supply (Including 20% buffer in years 1-5 brought forward from years 6-15 and overall 2.6% buffer)	314	401	366	432	365	320	430	316	622	1,063	1,178	1,482	1,350	1,194	1,094	1,085	1,102	1,003	926	842	14,989	

Figure 2.2: Table 3.2 (Draft Local Plan Housing Trajectory)

2.8 Whilst the Housing Trajectory suggests compliance with paragraph 69 of the NPPF with regards to broad locations between years 6-15, it fails to demonstrate specific, deliverable sites for the first 5 years since the intended date of adoption of the Local Plan.

2.9 We provide a detailed analysis and critique of the Housing Trajectory in relation to the Hemel Garden Communities covered under Policy LG2 (Support for Transformation of Hemel Hempstead)

South West Hertfordshire Joint Strategic Plan

2.10 The South West Hertfordshire Joint Strategic Plan (JSP), which covers the districts of St Albans, Dacorum, Three Rivers and Watford) is set to provide a long-term blueprint for South West Hertfordshire to 2050. It will be a document that will consider cross-boundary issues and will set out a strategic vision for the area, guiding future plans, setting out high level policies, coordinating the following matters:

- Climate change
- Strategic approach to Green Belt and AONB
- Net zero carbon

- Strategic growth opportunities
- Strategic infrastructure
- Economic opportunities
- Housing need

2.11 Given the failure of SACDC to discharge its Duty to Cooperate in its previous two Local Plan attempts, it is troubling to read in SACDC's LDS that there is no agreed nor coordinated timetable for the future preparation of the JSP. Given the clear requirement for cross-boundary strategic planning it would appear that any timetable for the St Albans Local Plan needs to be considered within the context of the JSP.

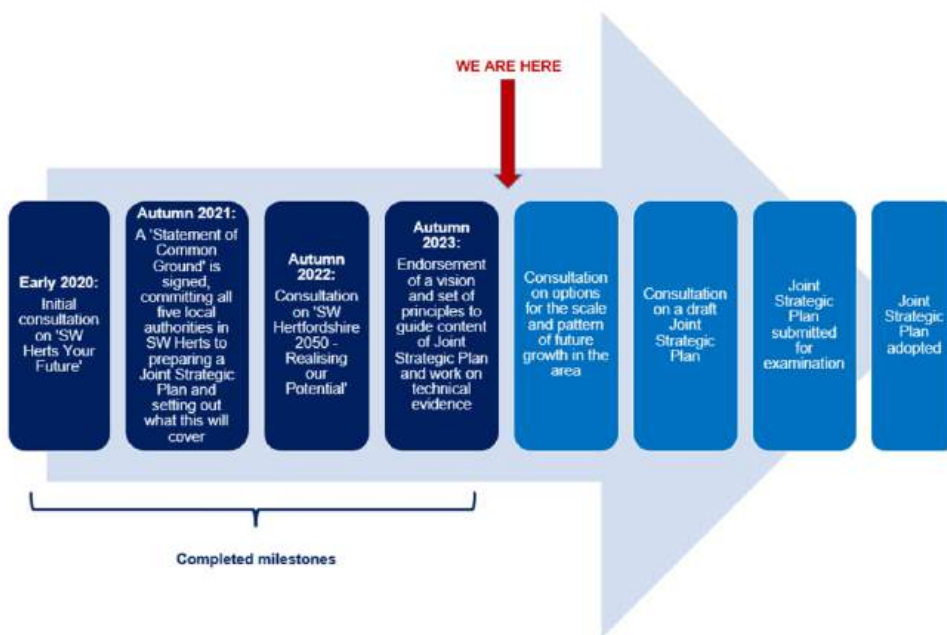


Figure 2.3: The most up-to-date board programme for the preparation of the preparation of the JSP. Source: JSP website.

	Informal Consultation : South West Herts – Your Future	Regulation 18: South West Hertfordshire 2050 – Realising Our Potential	Regulation 18: Options for the future pattern and scale of growth for the area	Regulation 19: Publication	Submission	Examination	Adoption
South West Hertfordshire Joint Strategic Plan	Spring 2020	Autumn 2022	Autumn 2025	TBC	TBC	TBC	TBC

Figure 2.4: The most up-to-date board programme for the preparation of the preparation of the JSP. Source: SACDC Local Development Scheme (September 2024).

2.12 It is also worth noting that the JSP timetable differs depending on the source. The JSP website does not determine the timetable for future stages, whilst the Local Development Scheme states that the Regulation 18 consultation for the JSP will take place in the Autumn 2025.

2.13 RPC suggests that SACDC should reconsider its timetable for production of the Local Plan so that it can prepare sound evidence base and properly align with the JSP whilst

working closely with its neighbouring authorities and prescribed bodies on transport modelling, infrastructure delivery, phasing and housing and employment delivery.

2.14 that SACDC should reconsider its timetable for production of the Local Plan so that it can prepare sound evidence base and properly align with the JSP whilst working closely with its neighbouring authorities and prescribed bodies on transport modelling, infrastructure delivery, phasing and housing and employment delivery.

3. Duty to Cooperate

- 3.1 RPC considers the St Albans Draft Local Plan to not be legally compliant due to St Albans City & District Council's (SACDC) failure to discharge its Duty to Cooperate.
- 3.2 SACDC has not complied with the Government's legal test for discharging its Duty to Cooperate. Local authorities must fulfil the legal requirement to cooperate with the Duty to Cooperate prescribed bodies by "*engaging constructively, actively and on an ongoing basis*"¹ on cross boundary strategic matters from the commencement of preparing the Local Plan to submission of the Local Plan to the Secretary of State for examination.
- 3.3 Section 33A of the Planning and Compulsory Purchase Act 2004, as inserted by section 110 of the Localism Act 2011² requires the council to cooperate with other local planning authorities and other 'prescribed bodies' in preparing and developing development plan documents and other local development documents so far as it relates to a strategic matter.
- 3.4 The Town and Country Planning (Local Planning) (England) Regulations 2012 states that:
- "(6) Where a local planning authority have co-operated with another local planning authority, county council, or a body or person prescribed under section 33A of the Act, the local planning authority's monitoring report must give details of what action they have taken during the period covered by the report."*
- 3.5 The NPPF is clear about the role and requirements imposed by the Duty to Cooperate which states:
- "Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere."*³
- 3.6 There is no supporting evidence provided by the Council in the Draft Local Plan Regulation 19 Publication or associated evidence base to help demonstrate that its legal requirements to discharge the Duty to Cooperate, as part of the plan-making process, have been fulfilled. Given the previous two failures of the St Albans Local Plan at Examination on Duty to Cooperate grounds and the development proposed in proximity and adjacent to neighbouring authorities with clear cross-boundary strategic matters, one would expect cross-boundary working on these matters to be active, ongoing and constructive from the commencement of Local Plan preparation to be set out transparently and in full.
- 3.7 The only meaningful reference to the Duty to Cooperate can be found in the latest Authority's Monitoring Report 2023, which covers the period between April 2022 and March 2023. There is no further record of the Authority's monitoring since March 2023 onwards and RPC is unable to understand whether any joint working has taken place with neighbouring authorities and Prescribed Bodies since then in the preparation of the Draft Local Plan.

¹ Section 33A of the Planning and Compulsory Purchase Act 2004, as inserted by section 110 of the Localism Act 2011 (2) (a)

² <https://www.legislation.gov.uk/ukpga/2004/5/section/33A>

³ NPPF paragraph 26

3.8 The Authority's Monitoring Report 2023 refers to several meetings and a workshop that took place with neighbouring authorities and Prescribed Bodies between 2021 and 2022 to discuss strategic cross boundary matters and a follow-up letter. However, the report does not explain what joint work has taken place since then in the following two years, to inform the currently proposed Draft Local Plan Publication (2024).

3.9 In order to demonstrate that effective and on-going joint working, Statements of Common Ground must be prepared and maintained with Prescribed Bodies and the PPG guidance on preparing a Statement of Common Ground (SOCG) is to be followed including the need for these to be publicly available through the plan making process for transparency:

*"In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency."*⁴

3.10 There are no published SOCGs with any prescribed bodies for communities and other stakeholders to view which help demonstrate that SACDC has fulfilled the legal and policy requirements of Government with relevant bodies since commencing with the preparation of the Local Plan.

South Hertfordshire Joint Strategic Plan SOCG

3.11 There is a SOCG on the South West Hertfordshire Joint Strategic Plan (JSP) website dated August 2021. It is unclear from the Draft Local Plan what the status of this JSP SOCG is. According to SACDC's Authority Monitoring Report (2022) this SOCG is in draft (see para 1.24 of the AMR). Regardless of existing a draft SOCG, this would only relate to the emerging JSP and not the St Albans Draft Local Plan 2041 in question.

3.12 Furthermore, whilst the JSP SOCG would be an essential element in the making of the JSP, it is only signed by the Local Planning Authorities that cover the South West Hertfordshire area but it is not signed by any of the Prescribed Bodies of Section 33A of the Planning and Compulsory Purchase Act 2004.

3.13 The published Overarching SOCG refers to the relationship between emerging Local plans and the JSP but it fails to identify how the Council and Prescribed Bodies have worked and continue to work jointly to ensure consistency and alignment in the production of local plans alongside the JSP.

Statement of Common Ground

3.14 RPC raises concerns with the high-level and insufficiently detailed SOCG that has been published together with the Draft Local Plan. The statement fails to include a plan showing the area of the SOCG and a justification for the selected area of application.

3.15 Furthermore, it does not include a timetable or programme for the development of the SOCG or subsequent individual statements with relevant bodies. There is no indication of expected milestones, stages or when reviews or updates to the SOCG would be

⁴ NPPF paragraph 27

required. This would be the normal case as the SOCG would evolve as joint working with Prescribed Bodies progress.

3.16 RPC is also concerned with the parties involved in the ‘Planning for Infrastructure’ and ‘Hemel Garden Communities’ Strategic Matters in the SOCG. These seem insufficient and relate mainly to highways and use of car as mode of transportation. It is no consideration of rail as one of the main modes of transport in the area, and Network Rail and Transport for London (and other rail service operators) have not been included in the list of bodies involved in the transport matter. Clearly, SACDC should have a more complete consideration of transport beyond car use and highway capacity and safety, including sustainable and active transport as part of the strategic matters in the SOCG. This is particularly relevant, as the Local Plan sets out climate change and low carbon as the first objective of the Local Plan. It would be reasonable to include sustainable transport and active travel in the SOCG and involve all relevant parties that contribute to deliver the necessary strategic cross-boundary infrastructure and services.

3.17 The SOCG is also ambiguous and provides no evidence of meaningful collaboration between SACDC and neighbouring authorities and Prescribed Bodies as there is no meaningful common ground between bodies in the SOCG. The common only common ground identified in the statement relates to the *“strategic geography and what comprises the strategic cross-boundary matters”*. This is clearly an insufficient common ground and only sets out minimal preliminary work of eventual joint working, which has not demonstrated yet.

3.18 Planning Practice Guidance (PPG) states that authorities should make any statements of common ground (SOCG) available on their website **by the time they publish their draft plan so that communities and stakeholders have a transparent picture of how they have collaborated:**

*“Authorities should have made a statement of common ground available on their website by the time they publish their draft plan, in order to provide communities and other stakeholders with a transparent picture of how they have collaborated”.*⁵

3.19 PPG states that the purpose of the SOCG is to demonstrate that plans are deliverable over the plan period:

*“It documents where effective co-operation is and is not happening throughout the plan-making process, and is a way of demonstrating at examination that plans are deliverable over the plan period, and based on effective joint working across local authority boundaries”.*⁶

3.20 Despite SACDC’s attempt to evidence that it has discharged the duty in its Statement of Common Ground (Overarching) (Autumn 2024), there is lack of substantive and up to date evidence that ‘active’, ‘ongoing’ and ‘constructive’ cooperation took place from the start of the preparation of the Local Plan. If further evidence of cooperation were to be submitted by SACDC in the lead up to, or after submission of the Local Plan then this would clearly demonstrate that the Local Plan and its policies were not informed by this engagement – which is, after all, the entire reason for the Duty to Cooperate as explained in the NPPF: *“effective and on-going joint working between strategic policy-making*

⁵ Paragraph: 020 Reference ID: 61-020-20190315 <https://www.gov.uk/guidance/plan-making#maintaining-effective-cooperation>

⁶ Paragraph: 010 Reference ID: 61-010-20190315 <https://www.gov.uk/guidance/plan-making#maintaining-effective-cooperation>

authorities and relevant bodies is integral to the production of a positively prepared and justified strategy”⁷.

3.21 The SOCG only establishes as common ground with SACDC’s strategic partners: the strategic geography and what comprises the strategic cross-boundary matters. Unfortunately, **the SOCG does not contain any substance on what constitutes the material cooperation between parties on the agreed strategic matters.**

3.22 RPC considers that SADC fails to provide the necessary evidence to demonstrate that it has discharged its Duty to Cooperate for the following reasons:

- The SACDC’s statement simply outlines the Duty to Cooperate bodies and the potential strategic cross boundary issues.
- There is no evidence provided of meeting minutes, emails or letters between SACDC and Prescribed Bodies. This makes it impossible for one to understand what sort of engagement, if any, has taken place between bodies.
- SACDC does not identify the stage of progress of any individual SOCG with any of the prescribed bodies.
- There is no indication of any governance arrangement for the cooperation process is in place.
- There is no indication of the distribution of needs in the area, or the process for agreeing the distribution of need (including unmet need) with partners.

3.23 **There is no SADC’s Duty to Cooperate Statement of Compliance accompanying the Draft Local Plan (Regulation 19).**

3.24 Based on the evidence currently provided, it is not clear what activities SACDC has undertaken to demonstrate discharging its legal Duty to Cooperate. Critically, SACDC cannot demonstrate that the Local Plan’s policies have been developed through effective, ongoing and constructive engagement with Prescribed Bodies and that the additional necessary infrastructure is determined according to proposed growth needs.

3.25 The Duty to Cooperate cannot be rectified post-submission so if the Inspector finds that the Duty has not been complied with the examination will not proceed any further⁸. SACDC should not be proceeding with this Regulation 19 consultation given that all indications are that the Duty to Cooperate has not been discharged.

⁷ NPPF paragraph 26

⁸ PPG Paragraph: 031 Reference ID: 61-031-20190315

4. Sustainability Appraisal (SA)

- 4.1 We bring into question the validity of the methodology and the results of the SACDC Sustainability Appraisal (September 2024). We summarise our points in relation to the Sustainability Appraisal below. Please note, we make a number of points in this section in relation to proposed broad locations and sites. We request that SACDC please ensures that those representations are captured in response to the Sustainability Appraisal as well as in response to the broad locations and sites.
- 4.2 As an overall statement about the SA, it is extremely difficult to see how the assumptions and output of the SA can be relied upon given the lack of up to date and detailed information across the evidence in relation to HGC. Without a clear understanding about what infrastructure will be delivered, its cost and how it will be funded for the largest growth area of the Local Plan how can the SA prepare reasonable alternatives and draw meaningful conclusions to inform decisions in the Local Plan.
- 4.3 Perhaps this lack of critical evidence base regarding the HGC is what has led the SA to include that HGC is a 'constant' across all eight 'reasonable alternatives'. This is clearly an unsound approach and undermines the validity of the SA.
- 4.4 The SA states at paragraph 5.5.2 that:
- "The starting point is an understanding that: A) support for **HGC** in full can reasonably be held constant"*
- 4.5 In order to understand the reason for this conclusion one must read paragraphs 5.4.22 – 5.4.28. This makes a number of statements which are not based on technical assessments but are more political and 'practical' in nature which should raise very serious concerns as to the legitimacy of the SA as sound evidence to be relied upon for the Local Plan.
- 4.6 It states at paragraph 5.4.23 that:
- "On balance, the decision reached is that HGC warrants being treated as a **constant**, in light of the latest evidence and understanding, including via the consultation in 2023. An overriding consideration is that the St Albans Local Plan simply could not progress to the Regulation 19 stage without HGC i.e. there would be a need for further consultation under Regulation 18, leading to major issues in terms of a risk/likelihood of Government intervention and a further prolonged period of struggling to defend against planning applications due to the presumption in favour of sustainable development. Also, it seems highly likely that the Dacorum Local Plan would struggle to progress, and there is the wider context of unmet housing and employment land needs in SW Herts (and, more generally, growth strategy, including HERT)."*
- 4.7 As we have set out through our representations the 'latest evidence' for HGC does not justify how the allocations are going to be delivered, and it is entirely unclear what the infrastructure required is or how it will be delivered.
- 4.8 The SA is also effectively saying that without all of HGC that it could not progress to the Regulation 19 and that another Regulation 18 consultation stage would lead to Government intervention and struggle to defend itself against planning applications. This is not an objective or technical assessment which is what an SA should be. There is another obvious flaw in this approach by the SA - by pretending that the HGC is going to be delivered under all reasonable alternatives, the Plan is placing the entirety of its strategy

and plan on the delivery of the HGC. If the Local Plan is found unsound and / or the HGC does not deliver as SACDC predicts (which is very likely) then SACDC and its communities will find itself in the very position it is seeking to avoid – that of unable to defend itself against planning applications due to a lack of housing supply.

4.9 The SA does conclude at paragraph 5.4.25 that:

“There is feasibly the possibility of reducing the scale/extent of growth somewhat at the southern extent of the area and possibly also at the northeast extent (less clear/significant), but there is no clear case for doing so, and even fairly modest adjustments could lead to a risk of delay to the plan-making timetable”

4.10 Therefore, technically there is a case for reducing the scale and growth at HGC yet the risk of delay to the plan-making timetable has meant that the SA and SACDC have are unwilling to assess this properly.

4.11 The SA explains (paragraph 5.4.28) that there is a separate question regarding delivery timescales which it claims is covered in section 5.5 of the SA however we cannot see how this is covered in this section.

4.12 As our representations clearly set out, the timely delivery of infrastructure, the development lead in times and delivery rates of HGC are unrealistic which should be assessed as part of the SA to arrive at a number of reasonable alternatives for the quantum of development that is actually possible at HGC.

Table 5.2: The RA growth scenarios (with Green Belt supply broken down by sub-area)

Supply components		1	2	3 (PO)	4	5	6	7	8		
Completions and permissions		2,176	2,176	2,176	2,176	2,176	2,176	2,176	2,176		
Windfall		2,103	2,103	2,103	2,103	2,103	2,103	2,103	2,103		
Allocations	Urban supply	960	960	960	960	960	960	960	960		
	Green Belt release	HGC	4,315	4,315	4,315	4,315	4,315	4,315	4,315	4,315	
		St Albans	Constants	1,775	1,775	1,775	1,775	1,775	1,775	1,775	1,775
			East	0	472	472	472	472	472	472	472
			SE	0	0	0	800		800	800	
			North ext.	0	0	0		1,400	1,400		1,400
		Harpenden	1,270	1,270	1,270	1,270	1,270	1,270	1,270	1,270	
		London Colney	324	324	324	324	324	324	324	324	
		Redbourn	612	545	612	545	545	545	612	612	
		Wheathampstead	145	0	145	0	0	0	145	145	
		Bricket Wood	127	0	127	0	0	0	127	127	
		CG, HW, PS/Frogmore	436	0	436	0	0	0	436	436	
		Edge of Radlett	274	274	274	274	274	274	274	274	
Total homes		14,517	14,213	14,989	15,013	15,613	16,413	15,789	16,389		
% above/below LHN		-1%	-3%	3%	3%	7%	12%	8%	12%		
Likely housing requirement		Below LHN		LHN			Above LHN?				

Figure 4.1: SA Table 5.2 RA Growth Scenarios showing HGC as the same in all scenarios

4.13 The SA (2023) provides an overview of Redbourn (see Pages 128 -129) we have the following comments:

- It states there is an *“hourly bus service to Dunstable and St Albans (19 mins)”*. **See our detailed overview of the bus service in Redbourn in the Spatial Strategy section – it should not be characterised as an hourly bus service to Dunstable and St Albans.**
- It states *“With regards to Green Belt options, the first point to make is that there is a strategic argument for Green Belt release at Redbourn, particularly given the need to consider the possibility of not delivering HGC in full; the need to consider the possibility of supporting lower growth at the three higher order settlement discussed above; and the need to minimise pressure for growth at lower tier settlements”*. **Firstly, the SA should not be recommending a supposed ‘backup plan’ for the possibility that that HGC might not deliver in full; this is inappropriate. Nor should the SA be suggesting that a Tier 4 settlement (Redbourn) should be taking more growth instead of higher order settlements which are set out in the Settlement Hierarchy of the Local Plan. Furthermore, it appears to be stating that Redbourn should also be taking the pressure off lower Tier settlements. The SA does not actually justify these statements which are basically that Redbourn should be a ‘back up’ for HGC non delivery, take the pressure off higher order settlements and take the pressure off lower tier settlements. We suggest and request this statement is removed from the SA.**
- The SA then provides a ‘broad sequential order of preference in relation to ‘Green Belt options’. **The ‘sequential order’ approach taken appears to be made up by the Consultants as this is not set out in the Green Belt Review.**
- The first sequential options it lists is ‘West of Redbourn’ quoting its strong performance in Green Belt terms, new infrastructure in the form a primary school or expansion of the existing primary school. It rightly points out inherent access / connectivity challenges and clear constraints including the M1 being adjacent and several public rights of way and the need to liaise very closely with Dacorum Borough. **The GBR Sub Areas that comprise West of Redbourn actually score ‘Strongly’ against the NPPF purposes for the Green Belt. The GBR also raises potential issues regarding potential perceptual merging across the M1. The SA should not downplay the impact of the M1 impacting on potential development in this location.**
- The second sequential option in the SA is East of Redbourn. **It rightly states that this is a complex site and that the River Ver corridor is on site. However it fails to mention the large extent of Flood Zones 3 and 2 present which should be highlighted in more detail.**
- Table E (Summary of Redbourn growth scenarios to progress to Section 5.5) sets out 2 potential scenarios. **We consider that these scenarios should be developed further rather than stating that it is either ‘Non-Green Belt Release’ or ‘Both**

West of Redbourn’ and ‘East of Redbourn’. There should be additional scenarios that test just West of Redbourn and just East of Redbourn. Ideally there would be further granulation of West of Redbourn which does not include the whole site.

Scenario	Homes	
	Non-Green Belt release	Green Belt release
1) Low growth	69	-
2) Scenario 1 plus two sites supported by the GB Review	[Commitments, windfall and urban supply]	661
Other scenarios? As discussed, the next port of call would likely be land to the northeast, where there is the potential for a strategic urban extension. Also, there could be a need to consider the option of a reduced scheme to the east, with an increased focus on enhancing the river corridor and woodlands in this area.		

Figure 4.2: Interim SA Table E: Summary of Redbourn growth scenarios to progress to Section 5.5

4.14 SA Table 5.2 sets out the four growth scenarios by settlement. For Redbourn 661 dwellings is included for three out of the four scenarios with only one scenario showing no Green Belt Release in Redbourn. For the higher Tier settlements (St Albans, Harpenden, London Colney) there is more granulation in terms of the options across the scenarios.

Noise and Air Quality

4.15 The matter of noise and air quality have not been properly assessed as part of the plan making process including in the SA. There are serious concerns regarding the existing air and noise pollution in the area at Redbourn and Hemel East. The Sustainability Appraisal is very dismissive of this serious threat to human health and what the potential impact is of proposing development closer to the main source of the air and noise pollution – the M1. The SA states the following about this topic which demonstrates that the SA and the Local Plan has not really taken this key matter into consideration writing it off saying that air quality concerns are decreasing over time and focusing on the modal shift assumptions in the transport evidence.

“Hemel Garden Communities – there are two AQMAs at Hemel Hempstead, but these are relatively distant from HGC (associated with north-south road corridors close to the western edge of the town). HGC is considered to be associated with a considerable opportunity in respect of masterplanning in support of trip internalisation and modal shift away from the private car (albeit this remains a focus of ongoing work), plus the A414 strategy / HERT represents a considerable opportunity to address air quality hotspots across the sub-region (for example, Hertford is constrained). However, benefits would be felt in the long term, and air quality concerns are decreasing nationally over time (albeit concerns will remain, particularly in respect of particulates from roads, brakes and tiers given the weight of EVs).” (Paragraph 9.3.2)

“In conclusion, a broadly neutral effect is predicted on the baseline, as per the conclusion in 2023. There is little reason to suggest that the proposed growth

strategy will conflict with air quality objectives, particularly noting the location of AQMAs within the District and in surrounding areas. HGC is supported, but there is inherently an element of uncertainty and risk around achieving the high levels of modal shift (away from use of the private car) that are being assumed for the purposes of traffic modelling.” (Paragraph 9.3.4)

4.16 We have reviewed Defra’s 2019 Road Traffic Noise Levels mapping to see what this means for the Local Plan Area given the heavy traffic and congestion in the area including the presence of the M1.

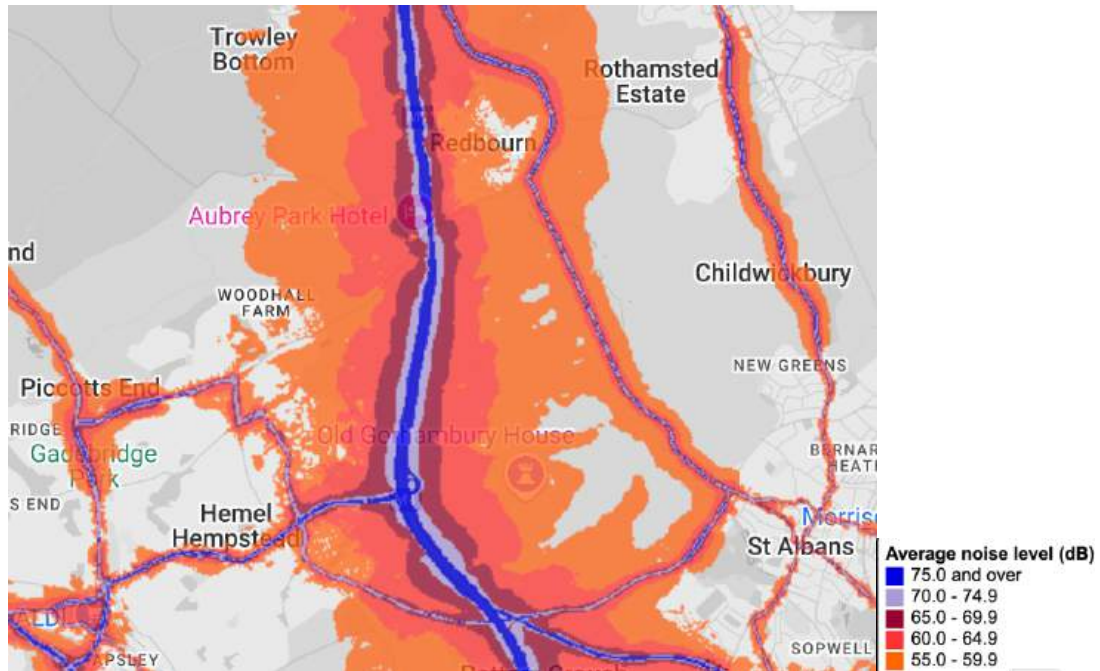


Figure 4.3: Defra (2019) Road Traffic Noise Levels Lden (day-evening-night) 24 hour annual average noise level in decibels with weightings applied for the evening and night periods Accessed: <http://www.extrium.co.uk/noiseviewer.html>



Figure 4.4: Defra (2019) Road Traffic Noise Levels Lden (day-evening-night) 24 hour annual average noise level in decibels with weightings applied for the evening and night periods. Source: <http://www.extrium.co.uk/noiseviewer.html>

4.17 As one can clearly see from the above mapping the noise levels east of Hemel and West of Redbourn do not appear to be safe and high density housing and employment in the area is going to further exacerbate this issue. It is very difficult to see how mitigation measures could greatly impact the noise and air pollution from the M1. In any case this area appears to be an unsafe and unsuitable location to allocate strategic housing that is meant to be 'sustainable' when its future residents will be exposed to unhealthy levels of pollution.

5. Vision and Objectives

Vision

5.1 Redbourn Parish Council provides several comments on the Vision and Objectives.

5.2 RPC considers that the proposed Vision and Objectives should be rooted to the local context and give a greater 'sense of place' of the District and a clear vision for its future that is both aspirational and realistic. We consider that it is important that the vision and objectives relate to St Albans District and they are not of an 'anywhere' place. The Vision and Objectives, as currently worded, do not relate directly to local context and the strategic policies in the Local Plan.

5.3 The proposed Vision states as follows:

“A thriving, inclusive and sustainable community which is a great place to live and work and has a vibrant economy”

5.4 Whilst RPC considers that the proposed vision is pleasant and it supports it generally, it requires more local context about what a thriving, inclusive and sustainable community means in St Albans District. What is the Local Plan envisaging when stating the district will be a great place to live and work? What is a vibrant economy in the context of St Albans? These should be better defined and put into context to ensure that the proposed aspiration is clear but also that objectives and policies feed from an unambiguous and contextually clear vision. The vision should be amended to better reflect what the aspiration is in terms of thriving, inclusivity, sustainability, etc.

5.5 The proposed vision, does not help, at this high level in setting out a clear design vision and expectations, as per paragraph 132 of the NPPF. Although design is not necessarily required to be included or mentioned in the Local Plan Vision, the proposed vision statement and supporting text fails to refer to the quality of place, which, in view of RPC, should be an important aspiration for the Local Plan.

5.6 Currently the Vision is void of talking about any places, settlements, special qualities or assets in the district, lacking any 'sense of place'. RPC would recommend amendments to the Vision so it makes meaningful connections to St Albans District and to include supporting text that would give context to where the vision comes from and where it relates to. Overall, it would be important to provide a spatial connection to what currently is a positively worded and simple aspiration.

5.7 For example, the Redbourn Neighbourhood Plan (2023) sets out locally distinctive Vision Statement and Objectives. This includes the following from its Vision Statement:

- *It has retained its village feel along with its particular individual characteristics including its high quality built heritage, high street and its green and spacious setting;*
- *Where development has taken place, this has been focused on providing for Redbourn's changing needs. The barrier created by not having enough of the type of properties that people want has been broken down. Additional affordable housing (for rent) and smaller dwellings have been built, enabling both young first-time buyers and older 'downsizers' to remain in the village (with all new dwellings built to Lifetime Homes standards so that they are capable of adaptation as*

people's needs change through their lives). This has been achieved with development that is in keeping with the character of Redbourn, in particular ensuring that historic and listed buildings remain protected;

- *Redbourn has become a thriving hub for small, start-up businesses. More residents now work locally';*
- *"The High Street is thriving in both daytime and evening and the appearance of the High Street reflects that. This has been anchored by the re-location of the Co-op to provide greater retail floorspace and parking provision at the former Bull Inn; and the re-location of the Redbourn Library to co-locate with the Fire Station at the northern end of the High Street, providing additional car parking for easy access to both the Library and High Street shops; and*
- *Redbourn remains a village with a distinct identity sitting in a rural setting. Development has served to improve access to the countryside surrounding Redbourn, which itself is protected from inappropriate development. This means that more Redbourn residents are able to enjoy the countryside including the Ver Valley's Nature Reserve which is run by a local community group of volunteers."*

South West Hertfordshire Vision

5.8 The emerging South Hertfordshire JSP has an agreed shared vision and set of principles that will be used to inform the JSP as it progresses. The document 'South West Hertfordshire 2050 – Our Vision for Realising our Potential (December 2023) sets out a general vision for the area and six pillars that contain specific principles that are designed to shape future policies. The vision states as follows:

"South West Herts will realise its full potential of being globally connected, nationally recognised and locally cherished. Known for its creative spirit, collaborative working and willingness to accelerate positive change, it will be a place where sustainable growth provides a better and healthy future for both people and the environment."

5.9 Unfortunately, the Draft Local Plan does not acknowledge the JSP's vision nor develops it into a locally contextual and specific St Albans Local Plan Vision. Both visions are separate and uncoordinated, not sharing aspirations. How is this good plan making, if two plans applicable to the same area and in preparation at the same time, are not coordinated even in their most basic aspirations?

5.10 Furthermore, the JSP sets out six pillars that will guide future policies:

- Living green in a healthy natural environment.
- Growing opportunities to work locally.
- Living in healthy, thriving local communities.
- Moving easily in well-connected places.
- Building homes and places that people are proud of.
- Delivering robust and sustainable infrastructure.

5.11 Notwithstanding the above, the proposed Local Plan Vision does not cover the above pillars and matters such the natural environment, health, connectivity and infrastructure are not part of the vision.

Objectives

- 5.12 RPC considers the Objectives to have severe faults. As a general point about the Plan's Objectives, they are not measurable and are therefore ineffective both in terms of the Local Plan Policies prepared to help deliver the respective objectives and in terms of decision making. Another problem with the proposed objectives, is that they do not directly relate to the pillars and objectives in the emerging South West Hertfordshire Joint Strategic Plan.
- 5.13 The Climate Change and Spatial Strategy objective is welcomed insofar as it follows from a global and national aspiration to tackle climate change. Notwithstanding this, there are several questions on whether this objective is realistic, effective and adequate, as currently worded.
- 5.14 The promotion of adaptation to and mitigation of climate change is not a strong objective, as 'promoting' only, in the absence of clear targets, could fall very short of the necessary measures to address mitigation of and adaptation to climate change. This objective is not ambitious, and it is not measurable, therefore not being effective.
- 5.15 Furthermore, the objective is aimed to achieve net zero carbon emissions by 2030, but the Local Plan covers the period from 2024 until 2041: the early years of the adopted plan would have very limited impact, as the spatial strategy would not be materially delivered with allocated sites until year 4 from adoption, meaning 2029/2030. How is the Local Plan going to achieve net zero by 2030 if the bulk of its spatial strategy won't start being delivered until that same year when net zero is supposed to be achieved? Furthermore, the plan period extends until 2041, but the objective does not set out targets beyond 2030.
- 5.16 The climate change objective is also ineffective and ambiguous where it states that the Council will do everything reasonably within its power. The text should set out a target that is clear and that could be followed by strategic policies for achieving of the objective. The current text is only aspirational, unmeasurable and non-committal.
- 5.17 None of the objectives set out in the Draft Local Plan are measurable and whilst they are good aspirations for the Local Plan, they do not seem to inform the policies contained within the plan. We raise concerns with the constant conflict between proposed policies and the objectives, as these are not aligned. RPC considers that the overall objectives are supported, but their content is unsound due to these being ineffective when being translated into planning policy and ambiguous.

6. Spatial Strategy

Policy SP1 (A Spatial Strategy for St Albans District)

6.1 RPC considers this policy to be **unsound** due it **not being justified, effective or consistent with national policy**. We explain the reasons for concluding this below.

6.2 Strategic Policy SP1 (A Spatial Strategy for St Albans District) is a confusing policy that fails to clearly set out the Spatial Strategy for the District in a coherent manner and is factually incorrect in many places. We make the following general points and then discuss the settlement hierarchy in more detail.

Key points:

6.3 Stating that "*The Spatial Strategy positively plans for the future to ensure that by 2041 St Albans District is a great place to live, work and visit*" is effectively just repeating the Vision and is not required and add clutter to an already confusing policy text.

6.4 Stating that "Growth must be supported by the necessary community infrastructure, transport improvements, green spaces and tree planting" appears to be very limited in scope of what SACDC expects to support 'growth' and what communities need. The terminology of using 'growth' is outdated and should instead use and reflect National Policy wording including 'Sustainable Development' and its overarching economic social and environmental objectives as set out in the NPPF.

6.5 Policy SP1 states that "growth will be located to make the most sustainable use of land in urban areas and then the Green Belt" and that "the approach seeks to develop Brownfield Land first".

- Firstly, the policy says nothing about the need for exceptional circumstances to be present before any release of Green Belt through the Local Plan and what exceptional circumstances SACDC purports there to be.
- Secondly, the policy is unclear in terms of differentiating between 'land in urban areas' and 'Brownfield Land'. Not all brownfield land is in urban areas, it can often be located outside of urban areas in the Green Belt. What does SACDC consider to be 'urban areas' – does this include all settlements or just Tier 1, Tier 2 and Tier 3 settlements for example? It is unclear. This should be clarified, and there should be, ideally, a cascade of preferred location for development, that gives consideration to sustainability according to the settlement hierarchy, Green Belt location, urban area location, and previously developed land (or Brownfield Land).
- Thirdly, it is apparent from the Draft Local Plan Housing Trajectory (Table 3.2) that 'Hemel Garden Communities' (Green Belt location), 'Medium and Small Sites' (5-99 homes), are assumed to start delivery in 2029/2030 the same year that 'Sites Within Urban Settlements' (HELAA and UCS) and 'Green Belt – Previously Developed Land'. Furthermore, the contribution of dwellings through allocations in previously developed land is very limited (1,040 homes) when compared to allocations in greenfield sites (9,613 homes), and very brief, with a trajectory between 2-7 years (brownfield sites), instead of 6-12 years (greenfield sites). So, it simply not the case that the Local Plan is planning for development in urban areas and brownfield land first.

- 6.6 This policy also identifies different thresholds of site allocations, but it does not justify where the type and size of allocations and these thresholds come from and what the definition of broad locations, other broad locations, large, medium and small sites is. A clearer policy wording is required, setting out the spatial strategy and allocation of development per parish/area and settlement, and it should be clearly visualised for the public and future users of the Local Plan to understand the policy without doubt. Any supporting text should include contextual information, such as the definition of settlement tiers and the size of allocations.
- 6.7 The measures stated to address the climate emergency do not fully reflect the Local Plan's draft Climate Emergency Policy. For example, it refers to 'layouts' yet this is not in the Climate Emergency Policy. It does not mention biodiversity net gain despite this being in the Climate Emergency Policy.
- 6.8 It is not necessary to state in the Policy wording that larger settlements provide a more comprehensive range of services etc. as it adds no substance to the policy.
- 6.9 The last paragraph of Policy SP1 relates to matters that the Local Plan supports, but this long paragraph and its 10 bullet points do not add substance to the spatial strategy, and some are irrelevant to the purpose of the policy. How is the building sustainability standards related to the spatial strategy of the Local Plan? This should be better included in a climate change and sustainable construction policy. Furthermore, the wording of the policy in this section is not strong enough as to be applicable and enforceable: "*The Local Plan supports...*" is not a robust wording of the policy and would lead to its ineffectiveness.
- 6.10 The Local Plan supports matters such "significant new employment space provision", significantly increasing tree cover..." or "Green Belt compensatory measures", but it should clarify whether these are general aspirations or whether these are expectations that are tied to broad or specific locations and developments. Whilst the Policy SP1 specifically identifies development areas for housing in broad and specific locations, other matters are relegated to mere Local Plan "support". A clearer and more robust policy is needed so this is effective and leads to unambiguous interpretation.

Key diagram

- 6.11 The Key Diagram has a number of deficiencies that result in the Local Plan being unsound as it is not effective and not consistent with national policy.
- 6.12 It is a very messy diagram for the District of St Albans (which boundary is not shown), to the point where it is not possible to make out what is being proposed, we suggest that it is simplified and clarified.

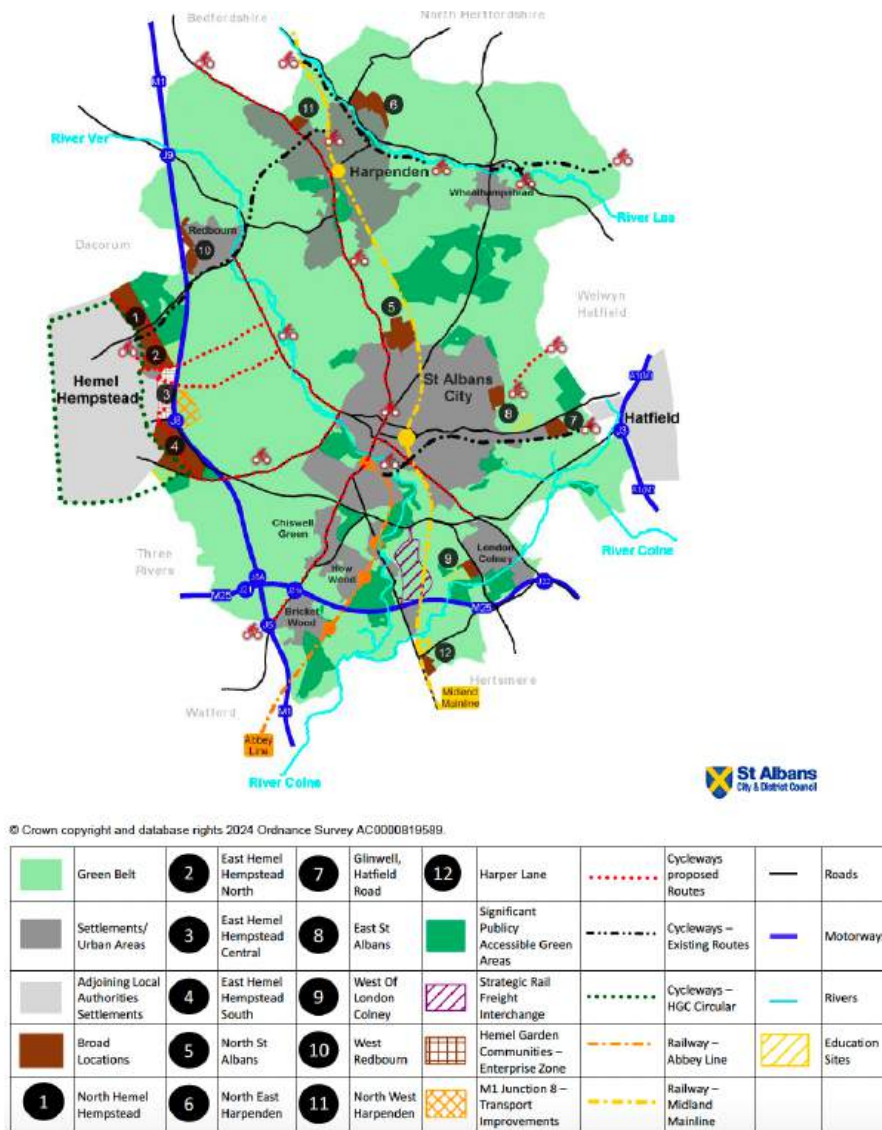


Figure 6.1: Key Diagram

The Settlement Hierarchy

6.13 The Draft Local Plan does not set out the overall housing planned by settlement, so we have taken the initiative to undertake this exercise to better understand how SACDC is proposing to distribute housing, with special interest in Redbourn. We have based our calculations on Part B of the Local Plan (Local Plan Sites) and the development assumptions set out in Table 3.1 of the Draft Local Plan.

6.14 We have included the Draft Local Plan’s proposed Settlement Hierarchy allocation for each settlement in the table below. Redbourn is clearly an anomaly as the proposed location of a disproportionate amount of housing for its place in the Settlement Hierarchy as a Tier 4 (Large Village). Furthermore, Redbourn is allocated significantly more residential development than London Colney, which sits higher in the Settlement Hierarchy. This is explained in more detail in the section below.

Settlement	Housing Allocated in Draft Local Plan (dwellings)	Proposed Tier in Settlement Hierarchy
Hemel Hempstead	5,515	Tier 1 City / Large Town
St Albans	2,992	Tier 1 City / Large Town
Harpenden	1,452	Tier 2 Town
Redbourn	618	Tier 4 Large Village
London Colney	391	Tier 3 Small Town
Harper Lane, Near Radlett	274	- (Near Tier 6 Settlement)
Chiswell Green	214	Tier 5 Medium Sized Village
Wheathampstead	145	Tier 4 Large Village
Bricket Wood	137	Tier 5 Medium Sized Village
Park Street	120	Tier 5 Medium Sized Village
Sleapshyde	80	Tier 6 Green Belt Village
Between London Colney and St Albans	64	- (Between Tier 1 and Tier 3 Settlements)
How Wood	49	Tier 5 Medium Sized Village
Colney Heath	49	Tier 6 Green Belt Village
Hatching Green	25	-
Total	12,176 dwellings	

Figure 6.2: Settlements, housing proposed and place in settlement hierarchy

6.15 We note that Policy SP1 states that "The City of St Albans will continue to be the pre-eminent focus in the District for housing, employment, services, retail, the evening economy, education and healthcare". However, according to our calculations the City of St Albans is not the pre-eminent focus of this Plan by a considerable margin; it is Hemel Hempstead that is the focus as the proposed location for 45% of the Draft Local Plan's housing growth (on broad locations and allocations). In contrast St Albans is the proposed location for 24% of the housing growth.

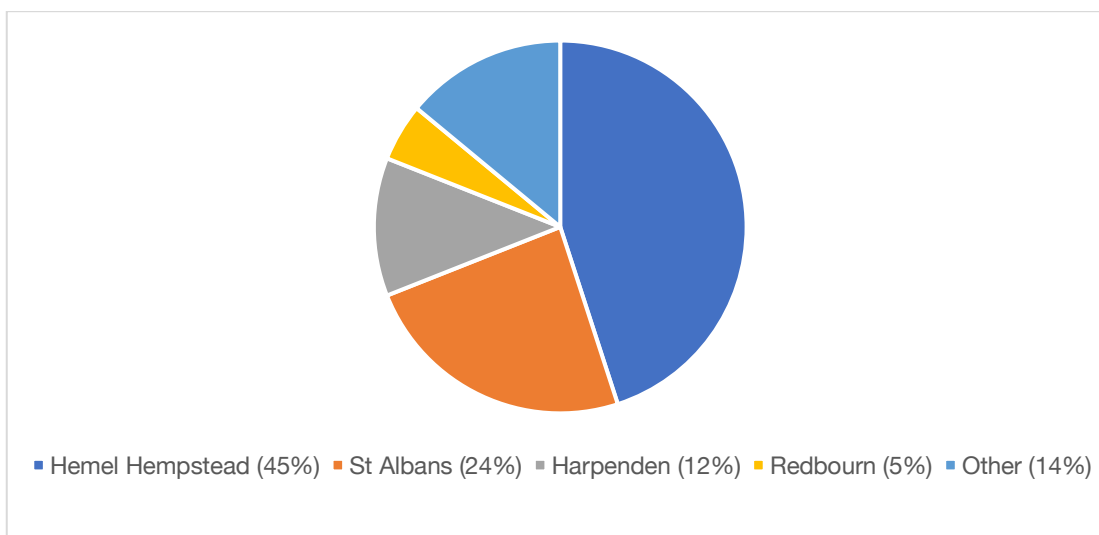


Figure 6.3: Pie chart illustrating the percentage of dwellings allocated per settlement

- 6.16 Within the Parish boundary of Redbourn, the Draft Local Plan proposed to allocate 3,718 homes across 5 sites. This includes sites H1 North Hemel Hempstead, H2 East Hemel Hempstead (North), and B3 West Redbourn, M6 South of Harpenden Lane and UC33 Land Rear of 53 Snatchup. 17 hectares of the Hemel Hempstead related growth of the site is located within the Parish of Redbourn.
- 6.17 Approximately 30% of housing growth in the St Albans District is proposed within the Parish of Redbourn. The map below shows the Policies Map and the key allocations around Redbourn village and on the edge of Hemel Hempstead.

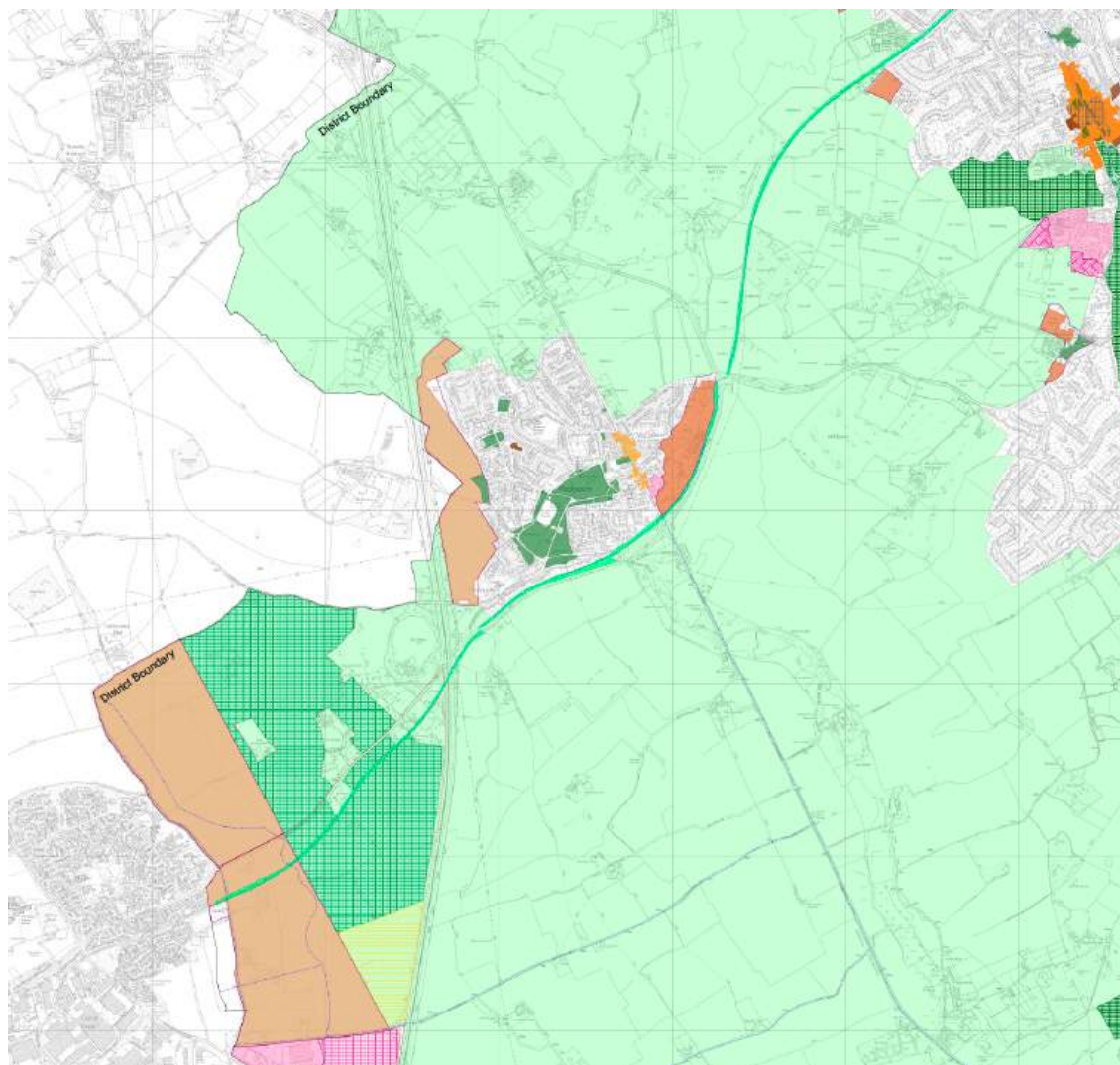


Figure 6.4: Local Plan Policies Map showing the allocated sites within the Redbourn area.

- 6.18 Despite the Policy's claim that St Albans is the 'pre-eminent' focus for housing and employment development in the District this is clearly a false statement as the Draft Local Plan is proposing substantially less housing in St Albans compared to Hemel Hempstead and Hemel Hempstead is the focus of 53 hectares of strategic employment land in the District. The growth proposed at Redbourn Village (and Parish) is disproportionate for its place in the Settlement Hierarchy as a Tier 4 settlement. It is a Village with a rural setting and does not have the services and facilities to support the level of proposed growth.
- 6.19 The supporting text of Policy SP1 (paragraph 1.33) states that the spatial strategy has been shaped by the need to address the climate emergency and that new development will be generally concentrated on the basis of the Settlement Hierarchy, giving priority to larger urban centres, which can provide a greater range of services and facilities, supports the re-use of land, can reduce the need to travel and offer greater accessibility to active travel and public transport. Redbourn Parish Council supports this approach, however it is concerned with the actual Settlement Hierarchy on Table 1.3 of the Draft Local Plan and the allocations proposed, as these do not reasonably comply with the aspiration of the policy in paragraph 1.33.
- 6.20 Whilst the supporting text of Policy SP1 (paragraphs 1.36-1.38) explains the general rationale for the proposed growth according to the Settlement Hierarchy with regards to St Albans City, Hemel Garden Communities, Harpenden and London Colney, it fails to explain the reasons why the Council considers that Redbourn should accommodate the

fourth highest figure of dwellings for a single village (618 dwellings), and the highest figure for a single parish: 3,718 dwellings.

6.21 According to the data from the Office for National Statistics⁹, the UK average household size is formed by 2.36 residents, which would mean that the proposed housing figure for Redbourn could result in approximately 1,500 new residents. According to the Settlement Hierarchy Study, Redbourn village (not parish) has a population of 5,000 residents. Therefore, the proposed allocations would result in an increase of population of the village by 30% in a period of 12 years (as expected in the proposed Housing Trajectory). This 30% increase in population in such a short period is unsustainable and would be difficult to achieve social sustainability in the village as a result.

6.22 Redbourn Parish Council is also concerned with the implication that such increase in housing numbers would have in terms of sustainability. As set out throughout our representations, Redbourn is not an area that is well located to other uses and nor is it serviced by any choice of transport modes apart from the private automobile and poor bus services. Furthermore, whilst the village is served by the Nickey Line (cycle way), the general infrastructure and public realm in the village is not suitable for inclusive and safe cycling. This means that car usage in Redbourn is high.

6.23 There is a heavy reliance on the Nickey Line throughout SACDC's documentation in terms of its role in delivering a modal shift away from the car to sustainable modes. However, the HGC Transport Vision and Strategy (2024) states the following, indicating that its deliverability is yet to be determined and it should not be assumed that its delivery is certain:

“work remains ongoing to further understand how the route can be improved further to increase the number of people using it for active travel purposes and enhance its strategic importance to HGC; this includes:

- *“The HGC Nickey Line Strategy and Feasibility Study (Hemel Hempstead to Harpenden);*
- *The HCC Nickey Line Cycle Connectivity and Accesses Study; and*

6.24 *Sustrans Nickey Line Feasibility Study (Redbourn to Harpenden)*“The Settlement Hierarchy Study states that Redbourn is located at a 15-minute drive to Luton Airport, but this is not a service, or an infrastructure used by residents on a regular basis nor necessary for daily live. Rail services are not available in Redbourn, but they are in Harpenden, 3 miles to the east, which could be accessed conveniently by private automobile, and less so by an infrequent bus service or by cycle via the Nickey Line that is not accessible nor inclusive for all users. Therefore, the only reasonable option to travel to the nearest railway station is by private automobile.

6.25 The Nickey Line is an excellent cycle route for recreation, also serving for commuting for some cyclists for travelling from Redbourn to Harpenden and Hemel Hempstead. Notwithstanding its benefits, the cycle line is not lit at night and it is not surfaced appropriately. Moreover, the line is isolated and detached from what should be a wider and complete cycle network. In the absence of a cycle network that connects the Nickey

⁹<https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/families/bulletins/familiesandhouseholds/2022#:~:text=Households-There%20were%20an%20estimated%2028.2%20million%20households%20in%20the%20UK,both%202012%20and%20in%202022.>

Line to different areas of the village (centre, common, school, etc.), there will be difficulties in the Nickey Line being a meaningful commuting route for all. All the above means that the Nickey Line is not an attractive infrastructure for all potential users, as it is a convenient and convenient use to all users. That is all potential users regardless of age, background, gender, health, etc.

- 6.26 There is no justification provided by SACDC for the selected Spatial Strategy in relation to Redbourn and to the disproportionate housing figure allocated in such unsustainable location. The proposed Policy SP1 is difficult to follow, considering the existing evidence (Settlement Hierarchy Study and Sustainability Appraisal) and it fails to effectively justify SACDC's decision to look to Redbourn for additional housing. The objectives of the Draft Local Plan regarding climate change and spatial strategy, housing and infrastructure state the following:

“Promote adaptation to and mitigation of the Climate Emergency; seek to achieve net zero by 2030, including through the Council doing everything reasonably within its power; promote the use of renewable resources, reduce greenhouse gas emissions, protect natural resources and reduce waste. [...]

Provide a sufficient amount of good quality housing which meets the needs of all sections of society in sustainable locations. [...]

Prioritise and enable the safe and attractive use of active and sustainable means of transport and reduce the need for people to travel.”

- 6.27 Redbourn is a village that is not sustainable due to having limited services and facilities and residents depend on private automobile for transportation. How is the proposed disproportionate housing figure proposed for Redbourn village aligned with the above-mentioned objectives of the Draft Local Plan? The Council has not provided any meaningful explanation.
- 6.28 Redbourn has a poor bus service, which poses a barrier to the proposed housing allocations, necessitating a comprehensive review of the Draft Local Plan's proposed site allocations and distribution of development. This revaluation is essential to ensure that future residents have viable and accessible means of public transportation within the Parish of Redbourn and to surrounding settlements.
- 6.29 The Settlement Hierarchy Study (2023) states that the three highest scoring settlements: St Albans, Harpenden and London Colney, whilst not scoring equally, they all score relatively well against settlement size, sustainable modes of transport, access to key services and facilities and employment. The study also states (paragraph 6.39) that Redbourn does not contain higher order services such as supermarket or leisure centre and has fewer employment sites than London Colney. Furthermore, Redbourn is a self-contained village detached from any other settlement, poorly connected to other settlements by public transport with a deficient bus service. Whilst London Colney benefits from better public transport and shorter distances to other settlements' services by foot and cycle.
- 6.30 Therefore, RPC considers that there is not enough justification for Redbourn being allocated a high amount of development in the settlement (and parish) where there are other locations that perform higher in the settlement hierarchy and are more sustainable in their location.
- 6.31 RPC considers the proposed settlement hierarchy to be ineffective not based on robust evidence, as the submitted Settlement Hierarchy Study (2023) is flawed. We explain the reasons below.

6.32 Policy SP1 states that the Settlement Hierarchy (Table 1.3) provides the basis for allocation and location of growth generally within and adjacent to the larger and most sustainable urban centres that are Tier 1 (St Albans and Hemel Hempstead) Tier 2 (Harpenden), and Tier 3 (London Colney). Redbourn and Wheathampstead are identified as Large Villages in Tier 4.

Tier Categories	Key Characteristics of Tier	Settlement
Tier 1 City / Large town	Largest population size Sub regional centre for employment and high-order services such as secondary education, retail and leisure Offers choice and variety of sustainable transport provision and connectivity by mainline train	St Albans Hemel Hempstead (currently within Dacorum Borough, but expansion into District planned)
Tier 2 Town	Considerably lower population size compared to City / Large town Provision of employment and high order services such as secondary education, retail and leisure Offers bus route, cycle lane provision and connectivity by mainline train	Harpenden
Tier 3 Small Town	Third largest population size Some employment provision and high order services including retail and leisure, but currently no secondary school Offers bus routes and cycle provision but lacking connectivity by mainline train	London Colney
Tier 4 Large Village	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	Redbourn Wheathampstead
Tier 5 Medium Sized Village	Smaller population size compared to the Large Villages Provision of key services Functional relationship with St Albans and Watford for high order services Availability of bus routes and rail branch line to provide transport offer	Bricket Wood Chiswell Green How Wood Park Street
Tier 6 Green Belt Village	Washed over by the Green Belt Smaller population size compared to Medium Sized Villages Some or few key services Generally functional relationship to settlements in higher tiers within the hierarchy which provide key services and higher order services Generally some or limited availability of bus routes to provide public transport offer	Sandridge Colney Heath (three parts) Lea Valley Estate Radlett Road Smallford Napsbury Park Sleapshyde Gustard Wood
Tier 7 – Green Belt Hamlet	Washed over by the Green Belt Population less than 250 residents	Folly Fields Annables, Kinsbourne Green

Figure 6.5: Draft Local Plan Settlement Hierarchy (Table 1.3)

6.33 The current policy in the Adopted Local Plan (1994) has Bricket Wood, Chiswell Green, How Wood, London Colney, Park Street / Frogmore, Redbourn and Wheathampstead designated as 'Large Villages'. We note that the Green Belt Review (Stage 1) (2013) which SACDC seeks to retain as part of its Local Plan evidence base, includes Bricket Wood, Chiswell Green, How Wood, London Colney, Park Street/Frogmore, Redbourn and

Wheathampstead as part of the 'Interpretation of the Local Settlement Hierarchy' (Table 3.2).

6.34 There is no explanation in the Draft Local Plan for why there is such a fundamental proposed change to the Settlement Hierarchy in terms of Redbourn and Wheathampstead remaining as Large Villages and the other settlements being downgraded.

6.35 We have reviewed the Settlement Hierarchy Study (June 2023) yet its methodology is quite crude and simplistic. The study uses a quantitative approach to assessing settlements in St Albans District, with regards to the following factors:

- Population
- Accessibility
- Services and facilities
- Employment

6.36 Population is an important factor but should not be decisive in the Settlement Hierarchy Study, as this document is designed to inform future growth in sustainable locations. Should a settlement have a relatively low population but score very high in terms of sustainability of its location, the low population factor should not score the settlement down, and vice versa. Appendix 3 of the Settlement Hierarchy Study gives 0.5 points to Redbourn due to its population. We contest that this scoring is necessary, as the assessment of settlements, when focused towards identifying sustainability and adequacy for future growth, should not necessarily be informed by the population (quantitative data), but the qualitative data of accessibility and availability of services, transport, etc.

6.37 The approach to assessing and scoring accessibility, for instance, is too simplistic and does not consider accessibility to transport options, but merely the presence of a service in a particular location. The study should provide points according to the distance of residential and employment areas to services, facilities and transport hubs. For example, the presence of a Nickey Line and other cycle routes in Redbourn means that the settlement scores 3 points in the transport assessment, but given the route's location on the edge of the village, the conditions of the route, the limited destinations available and the intrinsic physical nature of cycling, the transportation service of the cycle route is limited. The Nickey Line is only suitable for recreational cycling currently and as highlighted previously the extension of this line is not yet evidenced so it should not be used in assumptions regarding accessibility scores.

6.38 Unfortunately, the study does not refer to these relevant accessibility factors, but merely scores the settlement based on the presence of the cycle route. A qualitative assessment would be required as well as a quantitative check.

6.39 In terms of transport, the Settlement Hierarchy Study scores equivalently different transport options. For example, the presence of five cycle routes within/between settlements is equivalent to the presence of a main line railway station. Clearly, these two cannot be compared and scored equally in principle, as railway services provide transportation services normally to nearby settlements, London and the rest of the country. On the other side, cycle infrastructure is limited as a transport option insofar as medium and large distances cannot be reasonable travelled by bicycle. Cycling is also not a feasible option for many people in the district due to disabilities, age, health, safety, etc. Rail and cycle are two different transport options that whilst they are complementary to each other, cannot be compared with similar or equal scores. Similarly, bus lines are given

a single point in the assessment, if there is a bus line present in a settlement. However, it is worth to question what the actual service of this bus line (and other transport option) provides. Clearly an infrequent bus line connecting two small villages should not score equally to a frequent and regular bus service that connects a village to a city or a railway hub. The approach taken in the Settlement Hierarchy Study to assess accessibility and transport is too simplistic and therefore it is flawed.

6.40 We are concerned with the scoring given to Redbourn for cycling as it is not realistic. Appendix 4 (Accessibility Audit Scoring Table and Maps) identify three cycle routes and a confused picture of what cycling infrastructure is in Redbourn:

- Bridleway Flamstead 039 – a public right of way that meanders the countryside with no large settlement destination.
- Gaddesden Lane – a road with no dedicated cycle infrastructure, shared with vehicular traffic and leading to the countryside, not relevant destinations nor larger settlements.
- The Nickey Lane – national cycle route 57 along the south edge of Redbourn, connecting it to Hemel Hempstead and Harpenden.

6.41 The above gives a more realistic picture of the deficient cycle infrastructure in Redbourn, which should not be given 3 points in the scoring as the reality is that the aren't *“three to four strategic cycle routes within or between/connecting settlements”*, which is the methodology requirement for scoring 3 points. Redbourn should score 1 point only as there is a single strategic cycle route that connects the village to other settlements.



Figure 6.6: The Nickey Line or National Cycle Route 57 shown in yellow/orange. The only strategic cycle route serving Redbourn.

6.42 RPC is also concerned with the scoring of buses in the Settlement Hierarchy Study. Redbourn scores 3 points in this field, as there are three bus lines offering services in

Redbourn. We consider that this is a very simplistic assessment of the bus services in the settlement and that is flawed by not assessing the services qualitatively.

6.43 For instance, Bus 34 does not offer service all days of the week and the last service available during the week to travel to St Albans is at 18:10. The last service to return from St Albans is at 18:25.

Redbourn High Street (SE)	06:22	07:43	09:40	10:40	11:40	12:40	13:40	14:40	15:40	16:40	18:10
---------------------------	-------	-------	-------	-------	-------	-------	-------	-------	-------	-------	-------

Figure 6.7: Bus 34 timetable from Redbourn to St Albans (Intalink.org.uk).

St Albans City Railway Station Stop D	08:50	-	-	-	-	-	-	15:45	17:15	18:25
---------------------------------------	-------	---	---	---	---	---	---	-------	-------	-------

Figure 6.8: Bus 34 timetable from St Albans to Redbourn (Intalink.org.uk)

6.44 Similarly, the 46 bus offers hourly services between Luton and Hemel Hempstead. The service to Luton operates between 06:58 to 20:14, Monday through Saturday. The service to Hemel Hempstead operates between 07:22 and 19:32, Monday through Saturday. There is no service on Sundays.

Redbourn High Street (NW)	06:58	08:13	09:11	10:15	11:15	12:15	13:15	14:15	15:16	16:18	17:29	18:32	19:25	20:14
---------------------------	-------	-------	-------	-------	-------	-------	-------	-------	-------	-------	-------	-------	-------	-------

Figure 6.9: Bus 46 timetable to Luton (Intalink.org.uk)

Redbourn High Street (SE)	07:22	08:15	09:25	10:25	11:25	12:25	13:25	14:25	15:25	16:31	17:39	18:41	19:32
---------------------------	-------	-------	-------	-------	-------	-------	-------	-------	-------	-------	-------	-------	-------

Figure 6.10: Bus 46 timetable to Hemel Hempstead (Intalink.org.uk)

6.45 The 357 Red Rose bus offers a 'Sunday only' convoluted and slow service between Redbourn and Borehamwood via Harpenden and St Albans. The service to Borehamwood operates at 10:06, 12:36, 16:06, and 18:36. The service from Borehamwood to Redbourn arrives and terminates at 10:04, 12:34, 16:04 and 18:32.

Redbourn High Street (NW)	10:06	12:36	16:06	18:36
---------------------------	-------	-------	-------	-------

Figure 6.11: Bus 357 timetable to Borehamwood (Redrosetravel.com)

Redbourn High Street (NW)	10:04	12:34	16:04	18:34
---------------------------	-------	-------	-------	-------

Figure 6.12: Bus 357 timetable of arrivals in Redbourn (Redrosetravel.com)

6.46 In summary, the public transport in Redbourn is insufficient with a shortage of evening buses timetabled throughout the week, especially poor connectivity between Redbourn and Harpenden and a lack of Sunday bus services including no services between Redbourn, Hemel Hempstead or Luton and a slow and convoluted service to St Albans. The lack of available routes and the constrained frequency of services should be better reflected in the Settlement Hierarchy Study, as these services are not adequate nor sufficient to score 3 points. Other settlement hierarchy studies' methodology would normally score points if buses provide frequent services all week. This would be a more realistic and complete approach to assessing bus services in Redbourn. In the current context of bus services in Redbourn, the Settlement Hierarchy should score buses lower or zero points, instead of 3 points.

6.47 The Services and Facilities Audit (Appendix 5 of the Settlement Hierarchy Study) looks very basically at 'higher order services' and 'key services' (see below). We are concerned that this assessment is also flawed and misses several services and facilities normally found in settlements that haven't been accounted for, such as village halls, libraries, nurseries, public houses, places of worship, outdoor leisure facilities, hospitals, etc. Unfortunately, the study only refers to the following incomplete list of services and facilities:

- High order services: secondary school, supermarket, leisure centre.
- Key services: primary school, playground, convenience food shop, GP surgery

6.48 Redbourn scores the same as Bricket Wood, Chiswell Green and How Wood.

Settlement	Total Score	Higher Order Services			Key Services			
		Secondary School	Supermarket	Leisure Centre	Primary School	Playground	GP surgery	Convenience Food shop
St Albans	10	x	x	x	x	x	x	x
Harpenden	10	x	x	x	x	x	x	x
Bricket Wood	5				x	x	x	x
Chiswell Green	5				x	x	x	x
How Wood	5				x	x	x	x
London Colney	6		x	x	x	x	x	x
Park Street / Frogmore	3				x	x		
Redbourn	5				x	x	x	x
Wheathampstead	5				x	x	x	x
Colney Heath (3 parts)	3				x	x		
Gustard Wood	0							
Lea Valley Estate	1					x		
Radlett Road, Frogmore	0							
Sandridge	3				x	x	x	
Sleapshyde	1					x		
Smallford	1					x		

Figure 6.13: Appendix 5 – Services and Facilities Audit Scoring (Settlement Hierarchy Study).

6.49 Considering that How Wood and Chiswell Green were previously classified as 'Large Villages' individually there has clearly been merit in this designation. The Settlement Hierarchy (2023) gives an overall score for Chiswell Green as 9.3 and How Wood 7.4. The two settlements are functionally one settlement with a combined population of 7,557 which is greater than Redbourn (5,098). These settlements have access to a railway station whereas Redbourn is solely reliant on a bus service. We consider that How Wood and Chiswell Green should be considered as one settlement in the settlement hierarchy and at least Tier 4 as a 'Large Village'.



Figure 6.14: Satellite Image of How Wood and Chiswell Green (Source: Google Maps)

- 6.50 It is also concerning that Redbourn is given 2 points on the employment section due to having an employment allocation within the settlement area (Redbourn Industrial Park). Similarly to the comments above, the assessment is too simplistic and does not go into the detail of assessing the quality and amount of employment generation. How many work spaces are available? What typology of businesses are there?
- 6.51 Paragraph 6.27 of the Settlement Hierarchy Study states that “it is important that the quantitative outputs from this study are compared with qualitative data and local knowledge with regard to access to employment either within a settlement or by commuting to nearby settlements”. This has not taken place and there is no evidence in the study that the qualitative data of Redbourn has been considered in the scoring. There is only reference to the points given to Redbourn based on the presence of one built out and functioning employment allocation in the area. This assessment is also blind of any other employment areas, such as the high street businesses.
- 6.52 In light of all the above, we are of the view that the Settlement Hierarchy Study (2023) is flawed, overly simplistic and it is not based on robust evidence. Therefore, the study is not an adequate tool to inform the Spatial Strategy of the Draft Local Plan, and it has compromised the spatial strategy. Consequently, **Policy SP1 (Spatial Strategy) is not unsound due to it being ineffective in delivering sustainable development, it is not justified and based on proportionate evidence and it is inconsistent with national policy.**

7. Climate Emergency

Policy SP2 (Responding to the Climate Emergency)

7.1 RPC considers this policy to be **unsound** due it **not being justified, effective or consistent with national policy**. We explain the reasons for concluding this below.

7.2 Strategic Policy SP2 (Responding to the Climate Emergency), as currently drafted, is not effective, and is not justified. The Policy is a mix of a strategic policy and development management policy without providing an effective policy for plan-making or for determining planning applications.

7.3 The supporting text to the Policy does not provide suitably detailed context for the actual climate change issues facing the District. We refer SACDC to the Redbourn Neighbourhood Plan which sets out the approach at the Redbourn Parish-level highlighting key issues in relation to climate in the Parish in relation to the River Ver (chalk stream), the River Red (main groundwater drainage route for the area west of Redbourn and a main tributary of the River Ver) and the need to conserve and strengthen the Upper Ver Valley through the reversal of habitat fragmentation and the creation of and improvement of habitat links to create eco-corridors as set out in the Hertfordshire Landscape Character Assessment.

7.4 This importance of the River Ver and its tributaries is set out throughout SACDC's own Sustainability and Climate Crisis Strategy; for example it states:

"Locally, water levels in the River Ver and lakes make clear the impact of climate change on our District" (Page 3 - Joint statement from St Albans District political party group leaders)

"One of the most important habitats in the District is the River Ver, a chalk stream habitat rarely found outside of southern and eastern England. Chalkstreams are important habitats for species such as crayfish and kingfishers"(Page 35)

"Currently our chalk streams, such as the River Ver, are at risk from over abstraction, pollution and climate change" (Page 40)

7.5 We would expect this Strategic Policy to first set out the strategic measures the Local Plan is doing to respond to the Climate Emergency.

7.6 The Policy and supporting text fail to refer to the Government's Environment Act (2021) or its requirement for a Local Nature Recovery Strategies and how this is being delivered in the District.

7.7 The Policy uses the text 'the Council will support' before listing what development proposals will need to do in order to comply with the policy. However, the Policy does not explain in which instances the Policy requirements would not be appropriate. This should be clarified. Furthermore, the 'support' does not specifically mean whether the list of climate change-related criteria (a-k) are actually required in order to gain planning consent. The wording selected for the policy is not clear and strong enough and would lead to ambiguous interpretations of the policy and its ineffectiveness.

7.8 In terms of the Policy criteria (a-k) we make the following points:

a) This criterion is not specific about what is required to "demonstrate mitigation and adaption to climate change". Requiring an applicant to demonstrate it is simply

"pursing the reduction of whole life-cycle carbon emissions" will not deliver the urgent changes required. This criterion should be measurable.

- b) As we have set out in these representations, whilst SACDC claims to be prioritising the use of previously developed land it is not actually doing this. The NPPF requires that strategic policies set out a clear strategy for accommodating objectively assessed needs in a way that makes as much use possible of previously developed or 'brownfield land'. (NPPF para 119). There is no such clear strategy in this policy or other Local Plan policies. Furthermore, simply allocating development in previously developed land would not make it more sustainable or would necessarily contribute to tackle climate change. Policy should refer to previously developed land in sustainable locations.
- c) This criterion is not specific enough about what design measures should be used to 'improve resilience to climate change'.
- d) One would expect this to be part of the Strategic Policy regarding how the Local Plan itself is responding to the Climate Emergency and it does not provide any specifics about where it considers the 'most sustainable locations for growth' are in the District.
- e) This criterion is vague in terms of stating what is meant by 'high standards of energy efficiency and low carbon energy'. It is also not measurable, as currently worded and it is not proportionate to the nature and size of development.
- f) This criterion is not specific enough about what it considers to be sustainable and active transport modes of travel and includes no metrics that can be monitored or measured. The use of 'prioritise' as a criterion is too weak and would not contribute to secure the necessary infrastructure and design. This criterion should be more clearly worded.
- g) This criterion is silent on the amount of biodiversity net gain that will be delivered.
- h) Mitigating flood risk is already a national and local policy requirement. How is this criterion adding anything new with regards to tackling climate change? Could the mitigation be done through nature-based solutions?
- i) SuDS should be a requirement for all new development, where it is technically feasible. This criterion should be strengthened to ensure that all developments include SuDS. It should not be left to future interpretation when SuDS are appropriate or not, as it would lead to policy ambiguity.
- j) Criterion simply states 'demonstrate tree planting' with no specifics of the quantum, location or any other details.
- k) The combination of environmental payments could lead to the offset of most of the climate change and environmental expectations of a development. This criterion could make all other requirements ineffective as currently worded.

7.9 For the reasons outlined above, RPC considers Policy SP2 to be unsound due it **not being justified, effective or consistent with national policy**.

Policy CE1 (Promoting Sustainable Design, Construction and Building Efficiency)

- 7.10 Policy CE1 is ineffective insofar as it fails to set out clear and measurable requirements for development proposals, making it impossible to apply in the development management stage.
- 7.11 RPC is concerned with the lack of clarity on how the Council expects applicants to “demonstrate sustainable design and construction and a high degree of resource efficiency”. What is the evidence required by the Council? Furthermore, the policy states that this requirement would be to a degree of proportionality to the proposal. However, it does not explain what the requirement for each typology or size of proposal would be. Is the Council leaving this proportionality issue to be interpreted in the future? By whom? RPC considers that the Council should be setting out in the Local Plan policy clear requirements for different development proposals, according to their principles of proportionality, as well as identify the evidence documents that would be required at planning application stage.
- 7.12 Criterion a) of the policy is not measurable, and this is a problem. The policy should establish the thresholds allowed and not permitted when it refers to carbon emissions, pollution, energy, etc.
- 7.13 Therefore, RPC considers this policy to be **unsound due to not being effective**.

Policy CE2 (Renewable and Low Carbon Energy)

- 7.14 Similarly to Policy CE1 above, Policy CE2 lacks sufficient clarity on what the Council’s requirements are for new development. Whilst the expectations of the Council are the maximisation of use of renewable or low carbon energy, it is not clear how these requirements would apply to minor development. Is the Council’s intention, according to criterion b), that only major development is required to submit an energy Statement demonstrating the proposed use of renewable and low carbon energy sources? The Council has not defined what low carbon energy means.
- 7.15 The above questions highlight that **Policy CE2 is unsound, as it lacks clarity, measurable requirements and leads to ambiguity of interpretation, not being effective**.

8. Housing Need and Requirement

8.1 Policy SP3 (Land and the Green Belt) states that:

*“The minimum number of homes needed in the District, following a local housing need assessment conducted using the Government’s required Standard Methodology – is **885 dwellings per year, or a total need of 14,603 to 2041. This housing need figure is the same as the housing requirement figure of 885 dwellings per year, or a total need of 14,603 in the period 1 October 2024 to 31 March 2041.**”*

8.2 There is no meaningful text to support this policy in the Draft Local Plan that sets out what SACDC considers to be its housing need / requirement and where these figures come from. This is entirely unacceptable.

8.3 In order to read any further information on the housing need / requirement that the Draft Local Plan is presumably based on, one must look to Chapter 3 (Sustainable Use of Land and Green Belt) of the Draft Local Plan in the supporting text (para 3.7) to Strategic Policy SP3 (Land and the Green Belt). This supporting text states that *“to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the Government’s ‘Standard Method’ for calculating local housing need in national policy and guidance”*.

8.4 However, SACDC does not explain in this section what 'local housing need assessment' has been used to arrive at its housing need. How can the Draft Local Plan consultees understand or interrogate the housing need evidence used by SACDC when there is none provided apart from saying it used the 'Standard Method'?

8.5 Has SACDC used the South West Hertfordshire Local Housing Needs Assessment (September 2020) to arrive at its housing need figure? This study was undertaken four years ago (2020) which is a considerable time ago and should be considered by SACDC to be an out-of-date evidence base document. Policy HOU2 (Affordable Housing) refers to a Local Housing Needs Assessment (LHNA) dated 2019 however this does not appear in the Draft Local Plan Evidence Base on SACDC's website .

8.6 The text goes on to explain (para 3.11) that *“Government requirements for housing and employment growth need to be met in line with the law and Government planning policy. This will ultimately be judged by a Government appointed Planning Inspector. The Council cannot adopt a Local Plan without going through this process. At this point in time, these requirements therefore lead to the use of the housing figures set out at 3.8 above”*. It sounds from this statement like SACDC does not place much faith in the housing numbers it is using and is placing any liabilities with Government and the Planning Inspectorate.

8.7 Confusingly, Strategic Policy SP3 (Land and the Green Belt) states that the housing need figure is the same as the housing requirement figure of 885 dwellings per year, or a total need of 14,603.

8.8 It is both irresponsible and a waste of time and resources for SACDC to publish a Draft Local Plan proposing to release broad swathes of the Green Belt based on housing need / requirement figures that it has no faith in and that are not backed by robust evidence.

9. Exceptional Circumstances and Green Belt

Exceptional Circumstances

9.1 The NPPF affords great weight to Green Belts. Chapter 13 of the NPPF sets out policies which relate to the protection of the Green Belt. Paragraph 142 of the NPPF (Dec 2023) states that *"the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."*

9.2 The NPPF states that:

"Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non- strategic policies, including neighbourhood plans." (NPPF para 145).

9.3 Paragraph 3.19 of the supporting text of Policy SP3 acknowledges the requirements of national planning policy with regards to exceptional circumstances to justify changes to the Green Belt:

"Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

- a) Makes as much use as possible of suitable brownfield sites and underutilised land;*
- b) Optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*
- c) Has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground."* (NPPF para 146)

9.4 Notwithstanding the above, RPC raised concerns with the lack of text and evidence explaining the 'exceptional circumstances' that would lead to the justification of changes to the Green Belt. The Draft Local Plan (both Reg. 18 and Reg. 19 versions) fail to state what 'exceptional circumstances' there are for proposing the Draft Local Plan sites in the Green Belt. RPC concluded in previous representations that there was no demonstration by SACDC that it has "examined fully all other reasonable options for meetings its identified need for development".

9.5 Since then, the Council produced a Green Belt Exceptional Circumstances Evidence Paper (September 2024). A detailed examination of this paper outlines several serious concerns:

- a) The paper does not attempt to address any of the three criteria in paragraph 146 NPPF.
- b) It does not explain how the Council has made as much use as possible of suitable brownfield sites and underutilised land.
- c) The Council fails to explain whether they have considered optimising the density of development in town and city centres (St Albans or Harpenden) and other locations served by public transport (e.g. London Colney, Park Street, How Wood and Chiswell Green).
- d) It states that one of the 'exceptional circumstances' is *"The nature and extent of the harm to the Green Belt that would arise if the boundaries were to be altered as proposed"*. This is a confusing statement and is unclear what SACDC considers to be exceptional about the 'nature and extent of the harm to the Green Belt'.
- e) It is also not clear what is meant by: *"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"*.
- f) Importantly, the SACDC has not complied with the Government's legal test for discharging its Duty to Cooperate. Local authorities must fulfil the legal requirement to cooperate with the Duty to Cooperate prescribed bodies by *"engaging constructively, actively and on an ongoing basis"*¹⁰ on cross boundary strategic matters from the commencement of preparing the Local Plan to submission of the Local Plan to the Secretary of State for examination. Paragraph 146 NPPF requires discussions with neighbouring authorities about accommodating some of the identified need for development and to demonstrate it in a Statement of Common Ground.

9.6 The Green Belt Exceptional Circumstances Evidence Paper gives no evidence of discussions between SACDC and neighbouring authorities regarding meeting development need. It does not include demonstrated evidence of making as much use of brownfield and underutilised land, and there is a lack of demonstration of density optimisation. Consequently, RPC contests that the Council has demonstrated examining fully all reasonable options for meeting its identified need for development before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries.

Green Belt Review

9.7 The Draft Local Plan makes scant mention of the SACDC Green Belt Review (GBR) (Stage 1 2013 and Stage 2 2023). The supporting text of Policy SP3 (paragraph 3.17) only states that the Council undertook a detailed Green Belt Review in order to understand the impacts of potential development in the Green Belt.

¹⁰ Section 33A of the Planning and Compulsory Purchase Act 2004, as inserted by section 110 of the Localism Act 2011 (2) (a)

9.8 It is perplexing how SACDC can prepare a Stage 2 Green Belt Review consisting of a Main Report of 143 pages and an Annexe of 765 pages and only mention this GBR in passing in the Draft Local Plan.

9.9 Furthermore, the Local Plan's description that the Green Belt Review was undertaken in order to "understand the impacts of potential development in the Green Belt" is not the reason that SACDC should have prepared a Green Belt Review. As the Green Belt Review itself explains the purpose of a GBR is to provide evidence of how different areas of the Green Belt perform against the Green Belt purposes. It is then the role of LPA to take these findings into account alongside other evidence in making decisions about the Draft Local Plan strategy, site allocations / broad locations and ultimately possible alterations to Green Belt boundaries.

9.10 The Local Planning Authority should take the findings of the GBR into account alongside other evidence in making decisions about the Local Plan strategy, site allocations / broad locations and ultimately possible alterations to Green Belt boundaries. Strategic policies that establish the need for changes to the Green Belt boundaries should have regard to the Green Belt intended permanence in the long term, so Green Belts can endure beyond the plan period (paragraph 145, NPPF 2023).

9.11 A GBR forms an important part of the evidence base. It helps a council determine the manner and degree to which change in the Green Belt could be considered without damaging the purposes for including land in the Green Belt and the degree to which harm to the Green Belt would result if development were to take place.

"The purpose of a GBR is to provide evidence of how different areas of Green Belt perform against the Green Belt purposes, as set out in the National Planning Policy Framework (NPPF, 2021). The Local Planning Authority then take the findings of the review into account alongside other evidence in making decisions about the Local Plan strategy, site allocations / broad locations and ultimately possible alterations to Green Belt boundaries.

A GBR forms an important part of the evidence base. It helps a council determine the manner and degree to which change in the Green Belt could be considered without damaging the purposes for including land in the Green Belt and the degree to which harm to the Green Belt would result if development were to take place."

(Green Belt Review Stage 2 - Section 1.2)

9.12 The Draft Local Plan explains that a "Site Selection assessment has considered constraints such as environmental considerations like flood risk and wildlife conservation, and other planning factors such as distance to facilities, heritage and access" (Draft Local Plan para 3.18). A series of documents supporting site selection and allocation have been published on the Local Plan library in 2024, which we cover below.

9.13 RPC would also like to raise the following key points regarding the Green Belt Review.

- We question SACDC's decision to reuse the 2013 Green Belt Review Stage 1. This is a study that was conducted over 11 years ago. It was one of the first Green Belt Reviews in the country and consisted of a Stage 1 (Purpose Assessment) and Stage 2 (Site and Boundaries Study). SACDC wants to keep the Stage 1 Study but reject the Stage 2 Study. The reason for this as we understand it is that SACDC and its consultants that prepared the Green Belt Review Stage 2 (2023) claim that the 2013 Stage 1 Review was in some way 'endorsed' by the Inspectors who conducted the Examination for the withdrawn Local Plan in 2020. The Green Belt Review

Stage 2 (2023) refers to the Post Hearing Letters issued by the Inspectors explaining that their only concerns with the Green Belt evidence were in relation to the Stage 2 (Site and Boundaries Study). Yet when one reads the Inspectors' Letter (14th April 2020) nowhere does it state this. In fact, the Inspectors appear concerned that the Stage 1 Review was conducted "around the time that the Council was working on the previous SLP. At that time housing requirements were 8,720 (or 436 per annum) and so much lower than the current objectively assessed need (OAN) of 14,608 homes over the plan period". They then raise concerns that the Green Belt Review as not re-visited in the context of the much higher scale of need.

- Over a decade has passed since this first Review was undertaken and the OAN for the District remains as high (14,603 dwellings) and there have been numerous versions of the NPPF since as well as three withdrawn St Albans Local Plans and there is an expected significant amendment to the NPPF announced by Government by the end of 2024/early 2025. Surely SACDC should have started afresh with a full new Stage 1 GBR. In addition to the changes at the national level, there have been numerous Neighbourhood Plans prepared in St Albans District including the Redbourn Neighbourhood Plan (2023) which would need to form part of a GBR Stage 1 Study yet there is no such opportunity for this due to SACDC's decision to focus solely on a GBR Stage 2.
- The GBR Stage 2 (2023) appears to have effectively disregarded the GBR Stage 1 (2013) in any case. Arup describes it as a "more spatially focused piece of work" whereby they simply drew a buffer around each settlement inset from the Green Belt. A 400 metre buffer was drawn for the main settlements (St Albans, Harpenden, Hemel Hempstead, Radlett, Hatfield and Watford) while a 250 metre buffer was drawn for lower order settlements (Bricket Wood, Chiswell Green, How Wood, London Colney, Park Street / Frogmore, Redbourn, Wheathampstead, Shenley, Blackmore End, Abbots Langley) (Section 4.2.1). It then explains that these areas of assessment within the buffers were refined by taking into account (Section 4.2.2):
 - SKM Stage 1 GBR weakly performing land against NPPF purposes.
 - Promoted sites identified through the Council's site selection work.
 - Non-Green Belt land.
- It then states that "The full list of eight strategic and eight small-scale sub-areas, (Figure 3.3), that contribute least towards Green Belt purposes as assessed in the SKM Stage 1 GBR were considered for this exercise. However, only those sub-areas that fell entirely or partially within the settlement buffer, or immediately adjacent to another area / site entirely or partially within the settlement buffer (see application of settlement buffers), were taken forward. (Page 23).
- Stage 2 has also not taken forward the 'Local Purpose' of the Green Belt established in the Stage 1 GBR which is "To maintain the existing settlement pattern'. This purpose is effectively to assess and maintain the pattern of inner band local gaps between 1st tier settlements from 2nd and 3rd tier settlements and outer bands of secondary local gaps which separate 2nd and 3rd tier settlements. Importantly, Redbourn (2nd tier settlement) and the gap between it and Hemel Hempstead (1st tier settlement), St Albans (1st tier settlement) and the

gap between Redbourn and Harpenden (1st tier settlement) is considered a 'primary local gap' as illustrated in Figure 7.7 of the GBR Stage 1 (see below).

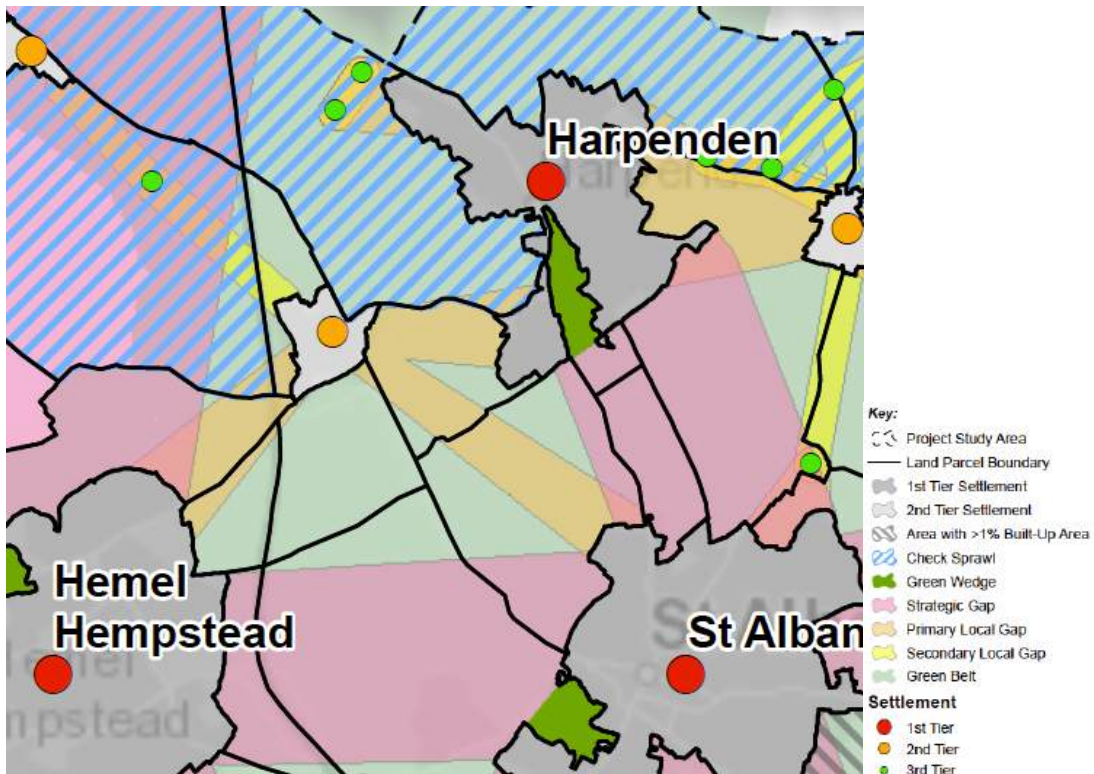


Figure 9.1: Extract from GBR Stage 1 (2013) Figure 7.7 Green Belt Functions

9.14 Based on the proposed broad locations and allocations in Redbourn in the Draft Local Plan, these 'primary local gaps' between Redbourn and Hemel Hempstead and Redbourn and Harpenden will be significantly eroded to 1.48km and 1.56km respectively (see map and measurements below). The GBR Stage 2 does not appear to acknowledge this or take this into consideration.



Figure 9.2: Primary Local Gap Erosion between Redbourn - Hemel Hempstead and Redbourn - Harpenden

9.15 Paragraph 4.23 of the Stage 2 GBR explains the filtering process that was undertaken to remove areas that are largely constrained by major policy constraints. It lists the following 'major policy constraints': Flood zone 3b; Scheduled Monuments; Registered Parks and Gardens; Ancient Woodland; and Sites of Special Scientific Interest (SSSI). Foot note 26 to SSI states "Other sites of international and national nature conservation importance (i.e. Special Protected Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites do not apply in St Albans. However, as highlighted in Sustainability Appraisal the Recreational Impact Zone for the Ashridge Woods and Commons SSSI component of the Chilterns Beechwoods SAC is located in the District and the great majority of affected sites are located to the east of Hemel Hempstead or at Redbourn. The GBR should take this into consideration.

9.16 As we detail under the HGC policies section in these representations, it is entirely unclear as to how SACDC can justify its disregard for the GBR studies which have not recommended the majority of Hemel East for removal from the Green Belt and in the case of West Redbourn the GBR does not recommend this site is taken forward if HGC is also taken forward.

9.17 It is both disappointing and an oversight that the GBR fails to include a review of the Redbourn Neighbourhood Plan which was 'made' in 2023 including its Design Guidance and Codes (2021) and contains a number of relevant policies and context that should be taken into account as part of the preparation of the GBR which is not even acknowledged. Central to the Neighbourhood Plan is its Vision for it to retain its village feel along with its particular individual characteristics including its high quality built heritage, high street and

its green and spacious setting. As stated in the Redbourn Neighbourhood Development Plan (para 6.19):

“The character of Redbourn derives from its scale and relationship with surrounding Green Belt, which comprises countryside, green and open spaces.”

9.18 Policy Red 6 (New Housing Sites) (see below) contains a number of requirements that should be taken into consideration as part of the GBR.

POLICY RED 6: NEW HOUSING SITES

1. Proposals for major development³³ will need to satisfy policies in the NPPF for development in the Green Belt and rural areas as appropriate. As a minimum, all major development proposals should:
 - a) maximise opportunities to build on brownfield and under-utilised land within the settlement boundary³⁴;
 - b) be located in accessible locations which are within an 800m walking distance (equating to a ten-minute walk of an actual walking distance [and not as the crow flies]) of nearby services and facilities;
 - c) be sited and designed so as to avoid exposure by residents, after any mitigation, to significant levels of traffic noise;
 - d) not have a detrimental impact on heritage assets (including nearby locally listed buildings, listed buildings, Conservation Areas and Ancient Monuments);
 - e) be of a scale, mass and form that is consistent with the existing built form or landscape character (as defined in the Redbourn Design Guidance and Codes) and rural uses; and
 - f) not have a detrimental impact on wildlife and provide biodiversity net gain of at least 10% where appropriate.
2. Proposals for development in the Green Belt will be subject to national policy.
3. Development that results in a net gain of new homes and which is located within the zone of influence around the Chiltern Beechwoods SAC³⁵ may need a HRA to be approved by Natural England.

Figure 9.3: Redbourn Neighbourhood Plan 2023 Policy Red 6 (New Housing Sites)

10 Strategic Policy LG1 (Broad Locations)

10.1 Policy LG1 fails to set out in Policy what Broad Locations are actually being proposed as part of the policy wording. It relies entirely on Part B of the Local Plan (Local Plan Sites). This is particularly confusing for the Hemel Hempstead related Broads Locations given that this area also has two of its own separate policies (LG2 and LG3). We reserve our comments on the Hemel Hempstead related Broad Locations for Policies LG2 and LG3; however please note that they also apply to Policy LG1 as far as those Broad Locations are concerned.

Allocation B3 – West Redbourn

10.2 The proposed Broad Location B3 West of Redbourn for approximately 545 dwellings is of such a scale that will alter the character of the village forever. This strategic development in the Green Belt to the west of Redbourn is inappropriate and unjustified by evidence. It is noted that the previous Local Plan that was submitted for Examination included no proposed allocations on the edge of Redbourn and / or in the Green Belt surrounding the settlement. There is no explanation from SACDC as to why this extreme change in policy has taken place.

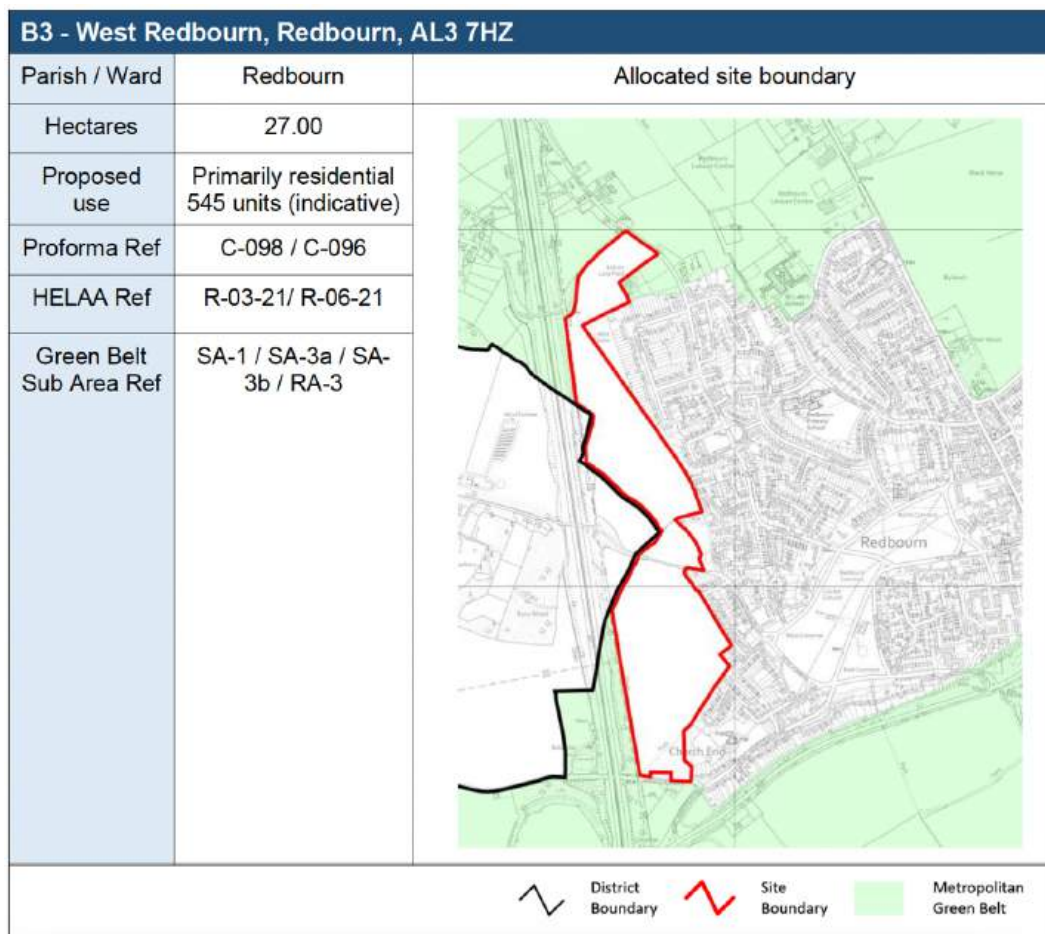


Figure 10.1: B3 – West Redbourn Allocation

- 10.3 As SACDC is aware only a small sub area of Parcel GB18B (Green Belt Land to West of Redbourn) at the southwest edge of Redbourn was recommended for further assessment as a small scale sub-area (SA-SS2) in the Stage 1 GBR. This area is described in the Review as Land at southwest edge of Redbourn' the sub-area enclosed by the M1 to the west in the vicinity of Gaddesden Lane which the Review concluded makes limited or no contribution to Green Belt purposes. This parcel appears to be the same or similar to Parcel SA-1 in the GBR Stage 2.
- 10.4 It is entirely unclear from the GBR Stage 2 how the recommendations from the Stage 1 GBR for a small scale sub-area southwest of Redbourn has now morphed into what is effectively a strategic urban extension bolted onto the historic village. Apparently SACDC has disregarded the GBR Stage 1 recommendations and the proposed allocation is more than double the size (27 ha) of the small scale-sub area (SA-SS2), which was only of an area of 13 ha.
- 10.5 The GBR states that sub-areas SA-1, SA-3a, SA-3b scored 0 points in table 5.5 of the GBR (2023), stating that these sub-areas do not meet purpose 4: "to preserve the setting and special character of historic towns". This decision is justified on these sub-areas not making contribution to preserving the setting of historic features. This is not accurate and it is also a simplified assessment and conclusion of the contribution of these sub-areas to the special character of the historic town and its setting. As already mentioned, the Redbourn NDP (paragraph 6.19) states that "The character of Redbourn derives from its scale and relationship with surrounding Green Belt, which comprises countryside, green and open spaces."
- 10.6 The Stage 2 GBR states that the sub-area does not abut an identified historic place or provide views to a historic place claiming that it makes no contribution to purpose 4 of the Green Belt; however, as identified in the Stage 1 GBR and is a fact, the parcel adjoins the Redbourn Conservation Area and Grade I and Grade II listings at the Parish Church of St Mary's to the east and the Aubreys Camp Scheduled Monument to the west of the M1.
- 10.7 The Stage 2 GBR states, in relation to SA-1 that "In combination with SA-2 and SA-3a, the removal of the sub-areas is unlikely to impact on the performance of the wider Green Belt due to the already diminished sense of openness caused by the urbanising influences from Redbourn's settlement edge. The removal of these sub-areas in combination would round off the settlement edge, and further unchecked sprawl would also be restricted by the presence of the M1 to the west." It would appear that the more that Green Belt parcels that are removed from the Green Belt in a certain location the more 'logical' or 'rounded' a settlement may become as a result and that is what Arup use to determine impact on the wider Green Belt. It appears that this is simply being viewed from a parcel boundary point of view where in reality, any development that may take place will need to respond to the site constraints such as noise from the motorway so that the 'rounding off of the settlement edge' is perhaps not as neat and tidy as the consultants would like to think in this high-level study.
- 10.8 Despite this statement, the Stage 2 GBR then states that due to the site being located on the district boundary, the sub-area may be impacted by potential Green Belt released in the neighbouring authority of Dacorum stating that while the M1 is likely to provide a barrier to sprawl, perceptual merging could still occur. This statement is repeated for SA3a which points to a lack of cross-boundary working on Green Belt matters with Dacorum District and a risk that development could occur on the western side of the M1 (there is a bridge that crossed the M1 in this location). It should be noted that there are

multiple road crossings between Redbourn and the western side of the M1 so it is a permeable barrier and we question any reliance on it as a defensible boundary.

Site selection

10.9 The Local Plan **Site Selection Proforma Sheet C-096 (West of Redbourn)** published by the Council in 2024, is not accurate and does not respond to the unbiased and clear evidence. RPC is concerned with the following matters regarding the proforma assessment:

- The pro-forma states that the site is located within “Green Belt Study less important area”, but according the GBR and the methodology accompanying the site selection, the site, as per the red line shown in the pro-forma is ‘partly within less important area’ and partly within an important area. This should be corrected, and justification should be provided to understand the rationale for the changes from the HELAA boundary site to the allocation boundary site. Furthermore, whilst the resulting allocation remains outside of the ‘important area’, no qualitative assessment has been carried out of the implications of the allocation being brought forward up to the boundary of the ‘important area’. How is any future development going to affect the Green Belt in this important location?

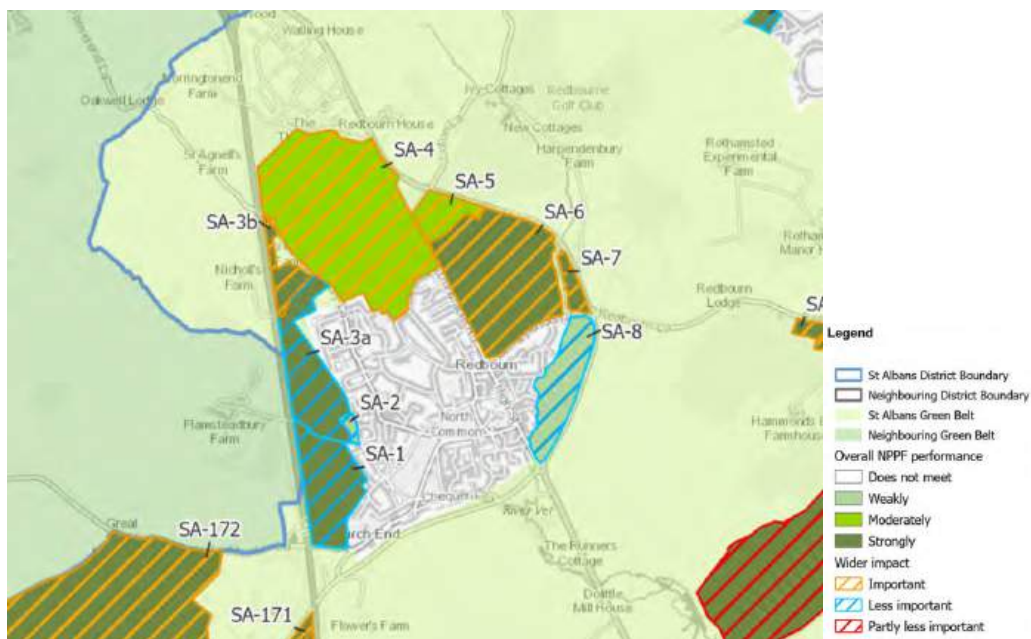


Figure 10.2. Extract of Figure 5.15 Categorisation North (Green Belt Review, 2023)

- The accessibility scoring is clearly inflated, and it is not a realistic to Redbourn. We have already raised in the spatial strategy section of this representation the concerns with regards to access to sustainable transport options and the frequency of bus services in particular. The sub-areas studied are located on the edge of the settlement, adjacent to 20th century suburban areas with no or very limited access to public transport, where walking distances are exacerbated by a convoluted suburban layout of cul-de-sacs and long residential roads, of difficult access to the town centre, facilities, employment and public transport. Therefore, RPC considers that the ‘Strong’ scoring in the accessibility section is unjustified.
- The pro-forma makes a simplistic assessment of landscape by only considering whether the site is within or 100m from a landscape conservation area. The site

is within the setting of the nationally designated Chilterns Area of Outstanding Natural Beauty (AONB, now National Landscape) but no consideration is given to this important landscape designation and the role of the site in its setting. The 'Strong' scoring of the site with regards to landscape is not informed by evidence and only based on a reduced and simplistic assessment approach.

- The air quality assessment (scoring 'Strong') is only looking at whether there are any air quality management areas in the area, but it does not assess beyond the presence of the air quality designation. The assessment should include a better understanding of the air quality situation, which is likely poor due to the adjacent M1.
- Noise is not considered in the assessment, but these sites are clearly exposed to significant noise pollution due to their close relationship with the M1.
- The called 'qualitative assessment' is not an assessment of any kind. It is simply an outline of the constraints of the site and other factual data, but there is no consideration of the pros and cons, opportunities and constraints and the rationale for some decisions. For instance, whilst the area of study (site ref. C-096) expands beyond the 250m settlement buffer, there is no explanation of why the site selected was reduced in size to stay within the boundary of the buffer.

10.10 The **Site Selection Proforma Sheet C-098 (Gaddesden Lane)** published by the Council in 2024, is also full of inaccuracies and RPC raises the following concerns:

- 110 metres away from Ancient Woodland
- No consideration is given to the Chilterns AONB (now National Landscape) designation and the role of the site in its setting. The 'Strong' scoring of the site with regards to landscape is not informed by evidence and only based on a reduced and simplistic assessment approach.
- The air quality assessment (scoring 'Strong') is only looking at whether there are any air quality management areas in the area, but it does not assess beyond the presence of the air quality designation. The assessment should include a better understanding of the air quality situation, which is likely poor due to the adjacent M1.
- Noise is missing in the assessment.
- The qualitative assessment section is also deficient for site ref. C-098, as it recommends the site to progress, but it does not justify the decision on any demonstrable consideration of evidence and its analysis. The section merely repeats facts of the site, but does not analyse them in the context of the site selection process.
- The qualitative assessment states that the site scores 'Medium' due to, according to the proforma methodology, the site is adjacent or within 100m of any known or likely Archaeological Assets. However, the proforma does not seem to acknowledge the evidence provided by the B3 West of Redbourn Heritage Impact Assessment (May 2024), which states (paragraph 5.8):

"Evidence from the Historic Environment Record indicates that there is a potential for occupation of the Site in the later prehistoric (probably Bronze Age through to the Late Iron Age) and Roman occupation within the Site. There is also the possibility of medieval remains to be present within the Site. Any

development within the Site has the potential to disturb or destroy previously unrecorded archaeological deposits. The deposits are likely to be largely intact with any damage only resulting from agricultural activity.

10.11 The Draft Local Plan - Part B (Local Plan Sites) sets out 12 Key Development Requirements. We make the following comments in response to this which does not in any way mean that the Parish Council is supportive of this proposed Broad Location. It objects to its inclusion in the Draft Local Plan. Its comments on the details of Part B are so that the key issues of the sites are further understood and evidenced by SACDC and the developer. We would have expected most of these matters to be assessed and addressed by this stage of the Local Plan where SACDC has already put these forward for inclusion however that is clearly not the case.

- It states that a new primary school is required to serve the new community. We refer SACDC to Policy Red 8 (Community Facilities) of the Redbourn Neighbourhood Development Plan that should be used to inform this.
- The proposed wording should strongly refer to a direct link to the Nickey Lane as a requirement prior the development takes place and to design this access so it is accessible to all users.
- Whilst RPC supports the policy requirement no. 3, it is not written strongly enough and may not be effective as it is. The policy should require a network of pedestrian and cycle routes that permeate and integrate with the rest of the town, facilitating and prioritising pedestrian mobility for all users. These routes should connect key destinations within the site and between the site and nodes and key employment areas, bus stops and facilities in the town.
- The wording of the masterplan requirement is not effective. Requirement 5 should aim for development (and the masterplan) to conserve and enhance the significance of heritage assets and their setting, not to minimise harm. The reference to setbacks is too prescriptive and unnecessary.
- The requirement for a noise assessment regarding the M1 along with mitigation measures - one would have expected for this to already have been undertaken before proposing the area in a Draft Local Plan. This is a 'showstopper' for the area and this technical work needs to be undertaken immediately.
- Requirement no. 6 regarding noise should be integrated in the masterplan design, which should be informed by a noise assessment. Layout, landscape and building design should take into account noise. The development should not rely on fencing, but noise attenuation should be designed in the layout first. Furthermore, the aspiration of the policy should be to achieve the healthiest environment as possible, rather than complying with minimum requirements.
- The reference at no. 8 to the pipeline is insufficient and requirements should be established in the policy, rather than weak sentences such as “development proposals must appropriately take this into account”. This is an ambiguous requirement with no clear outcome, therefore it should be amended. There is no mention of the electricity transmission lines that are located west of Redbourn or the need for the mitigation of these constraints.
- There is no specific key development requirement covering the need for archaeological investigation and potential mitigation and enhancement.

10.12 RPC objects to the proposed Broad Location Site B3 West of Redbourn, as the allocation has not been informed by unbiased and sufficient evidence, the assessment of evidence carried out by the Council is clearly insufficient. **This policy is unsound due to it being ineffective, it is not justified and based on proportionate evidence and it is inconsistent with national policy.**

11 Policy LG2 (Support for Transformation of Hemel Hempstead)

Green Belt

- 11.1 The Stage 2 GBR (2023) concludes that Sub-Areas SA-167, SA-168, SA169a, SA-169b, SA-170, SA-171 and SA-172 perform strongly against the NPPF Green Belt purposes. Of these Sub-Areas the GBR recommends that only SA-167, SA-169a and SA-169b should be taken forward for further consideration and there are still concerns raised regarding these Sub Areas in the GBR as set out below. We note that 169a is proposed for release in the Draft Local Plan but 168b is not proposed for release.
- 11.2 Sub-Areas (SA-168, SA-170, SA-171 and SA-172) form the Broad Locations North Hemel Hempstead and East Hemel Hempstead (North) and are also assessed as 'Important' in terms of their wider impact on the Green Belt.
- 11.3 Given that the two proposed Broad Locations at North Hemel Hempstead and East Hemel Hempstead (North) have not been recommended to be taken forward for further consideration SACDC and the Local Plan should not be proposing these areas for Green Belt release. **This should effectively remove these two Broad Locations along with their development assumptions which principally consist of a total of 3,100 dwellings.**
- 11.4 We pull out some of the key points from the GBR in relation to these Sub-Areas as a record of the clear recommendations of the GBR that the Broad Locations at North Hemel Hempstead and East Hemel Hempstead (North) are not recommended for further consideration:

SA-167

- *"The sub-area plays a moderately important role in preventing the irregular sprawl of Hemel Hempstead, in the absence of prominent inner boundary features".*
- *"Due to its strongly unspoilt rural character, the sub-area makes a more important contribution to safeguarding the countryside from encroachment."*
- *"In combination with SA-168, the release of the sub-area would lead to the irregular and large-scale sprawl of Hemel Hempstead".*
- *"In combination with other sub-areas in the wider cluster in which the sub-area is located (i.e. SA-163, SA-164, SA-165, SA-166, SA-168, SA-169a, SA-169b, SA-170, SA-171 and SA-172), the removal of the sub-area would lead to large-scale unchecked sprawl of Hemel Hempstead, and significantly reduce the gap between Hemel Hempstead and both Redbourn and St Albans."*

SA-168

- *"It is judged that development in the sub-area would lead to the perceptual merging of the neighbouring built-up areas."*
- *"The sub-area has a rising topography to the south, allowing views from the southern part of the sub-area onto the open fields in the north. Overall the sub-area has a largely rural character."*
- *"If the sub-area was released in isolation, it would significantly alter the performance of the wider Green Belt by enclosing Green Belt to the north and*

south in built form if developed, and leading to the large scale, irregular sprawl of Hemel Hempstead. It would also strengthen the role of the Green Belt to the north-east in maintaining the gap between Hemel Hempstead, with only a small part of Green Belt and the M1 preventing complete physical coalescence of the settlements.”

- *“In combination with either SA-169a, SA169b and SA-171, or with SA-167 the removal of the sub-area is likely to alter the performance of the wider Green Belt by enclosing Green Belt to the north and south respectively in built form if developed, and leading to the effective coalescence of Hemel Hempstead and Redbourn. The release of the sub-areas in combination would also lead to the disproportionate sprawl of Hemel Hempstead in comparison to the existing settlement size.”*
- *“Overall, the sub-area plays an important role with respect to the strategic land parcel, and its release in isolation or in combination would harm the performance of the wider Green Belt.”*
- *“The sub-area performs strongly against NPPF purposes and makes an important contribution to the wider Green Belt. Not recommended for further consideration.”*

SA-169a

- *“In combination with other sub-areas in the wider cluster in which the sub-area is located (i.e. SA-163, SA-164, SA-165, SA-166, SA-167, SA-168, SA-169b, SA-170, SA-171 and SA-172), the removal of the sub-area would lead to large-scale unchecked sprawl of Hemel Hempstead, and significantly reduce the gap between Hemel Hempstead and both Redbourn and St Albans.”*
- *“The southern boundary is readily recognisable but less likely to be permanent. If the sub-area was released, the new inner Green Belt boundary would not meet the NPPF definition. The new boundary would require strengthening.”*
- *“The sub-area performs strongly against NPPF purposes but makes a less important contribution to the wider Green Belt. If the sub-area was 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-54 or in combination with SA-169b as RC-13.”*

SA-169b

- *“In combination with SA-168, the removal of the sub-areas is likely to alter the performance of the wider Green Belt by leading to the large-scale sprawl of Hemel Hempstead, introducing urbanising influences, and strengthening the role of the Green Belt to the north-east in preventing the coalescence of Hemel Hempstead and Redbourn.”*
- *“In combination with other sub-areas in the wider cluster in which the sub-area is located (i.e. SA-163, SA-164, SA-165, SA-166, SA-167, SA-168, SA-169a, SA-170, SA-171 and SA-172), the removal of the sub-area would lead to large-scale unchecked sprawl of Hemel Hempstead, and significantly reduce the gap between Hemel Hempstead and both Redbourn and St Albans.”*
- *“Both the inner and outer boundaries of the sub-area are readily recognisable but not likely to be permanent. If the sub-area was released, the new inner*

Green Belt boundary would not meet the NPPF definition. The new inner boundary would require strengthening.”

- *“Overall, 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 with in isolation as RA-55 or in combination with SA-169a as RC-13.”*

SA-170

- *“The removal of the sub-area in isolation is likely to alter the performance of the surrounding Green Belt by strengthening its role in preventing further sprawl of Hemel Hempstead and the coalescence of Hemel Hempstead with Redbourn.”*
- *“In combination with either SA-169a, SA-171 or SA-172, the release of the sub-areas is likely to impact on the performance of the wider Green Belt by leading to the outward and irregular sprawl of Hemel Hempstead and by significantly reducing the gap between Hemel Hempstead and Redbourn.”*
- *“In combination with other sub-areas in the wider cluster in which the sub-area is located (i.e. SA-163, SA-164, SA-165, SA-166, SA-167, SA-168, SA-169a, SA-169b, SA-171 and SA-172), the removal of the sub-area would lead to large-scale unchecked sprawl of Hemel Hempstead, and significantly reduce the gap between Hemel Hempstead and both Redbourn and St Albans.”*
- *“Overall, the sub-area plays an important role with respect to the strategic land parcel, and its release in isolation or in combination would harm the performance of the wider Green Belt.”*
- *“The sub-area performs strongly against NPPF purposes and makes an important contribution to the wider Green Belt. Not recommended for further consideration.”*

SA-171

- *“The sub-area forms almost the entire gap between Redbourn and Hemel Hempstead and prevents the creation of ribbon development between the two settlements. It is judged that development in the sub-area will lead to the perceptual merging of neighbouring built-up areas.”*
- *“The removal of the sub-area in isolation would create a 'hole' in the Green Belt, introducing urbanising influences which would diminish the contribution of the surrounding Green Belt against purpose 3, and harming the integrity of the wider Green Belt. Its release in isolation is also likely to impact on the performance of the surrounding Green Belt by strengthening its role in preventing the further sprawl of Hemel Hempstead and its coalescence with Redbourn.”*
- *“In combination with any of the sub-areas, their removal is likely to impact on the performance of the wider Green Belt. The release would lead to the significant sprawl of Hemel Hempstead, both in terms of settlement shape and in size, and its encroachment into the countryside. It would also lead to the perceptual merging of Hemel Hempstead and Redbourn, physically separated only by the M1.”*
- *“In combination with other sub-areas in the wider cluster in which the sub-area is located (i.e. SA-163, SA-164, SA-165, SA-166, SA-167, SA-168, SA-169a,*

SA-169b, SA-170 and SA-172), the removal of the sub-area would lead to large-scale unchecked sprawl of Hemel Hempstead, and significantly reduce the gap between Hemel Hempstead and both Redbourn and St Albans.”

- *“The outer boundary of the sub-area is readily recognisable however the southern boundary is less likely to be permanent. If the sub-area was released, the new inner Green Belt boundary would not meet the NPPF definition. The new boundary would require strengthening.”*
- *“ The sub-area performs strongly against NPPF purposes and makes an important contribution to the wider Green Belt. Not recommended for further consideration.”*

SA-172

- *“The sub-area forms almost the entire gap between Redbourn and Hemel Hempstead, and has perceptual visual links to Redbourn. It is judged that development in this sub-area would lead to the physical and perceptual merging of neighbouring built-up areas.”*
- *“Overall the sub-area has a strongly unspoilt rural character”*
- *“The sub-area performs an important role in preventing the outward sprawl of Hemel Hempstead and preventing encroachment into the countryside due to its unspoilt rural character. The sub-area plays a more important role in preventing the merging of settlements, forming the entire gap between Redbourn and Hemel Hempstead.”*
- *“Its release would enclose the Green Belt in built form if it was released, and strengthen both its role in preventing the further unchecked sprawl of Hemel Hempstead and the coalescence of Hemel Hempstead and Redbourn. It would also introduce urbanising influences to the surrounding Belt Green and diminish the sense of openness in the countryside.”*
- *“In combination with SA-170, the removal of the sub-area is likely to alter the performance of the wider Green Belt against purposes 1 and 2 as it would lead to significant sprawl of Hemel Hempstead, and a diminution of the gap between Hemel Hempstead and Redbourn.”*
- *“In combination with other sub-areas in the wider cluster in which the sub-area is located (i.e. SA-163, SA-164, SA-165, SA-166, SA-167, SA-168, SA-169a, SA-169b, SA-170 and SA-171), the removal of the sub-area would lead to large-scale unchecked sprawl of Hemel Hempstead, and significantly reduce the gap between Hemel Hempstead and both Redbourn and St Albans.”*
- *“As it is located on the district boundary, the sub-area may be impacted by potential Green Belt releases in the neighbouring authority of Dacorum Borough Council. The Dacorum Borough Council Stage 2 Green Belt review and Landscape Appraisal Study (2016) identified sub-area HH-A1 to the west of the sub-area for further consideration. If Dacorum Borough Council decide to release Dacorum HH-A1 as part of their spatial strategy for their emerging Local Plan, the cumulative impact would need to be considered.”*
- *“Overall, the sub-area plays an important role with respect to the strategic land parcel, and its release in isolation or in combination would harm the performance of the wider Green Belt.”*
- *“The inner boundary of the sub-area is readily recognisable and likely to be permanent. The outer boundaries of the sub-area are readily recognisable but not necessarily permanent. If the sub-area was released, the new inner Green*

Belt boundary would not meet the NPPF definition. The new boundary would require strengthening.”

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

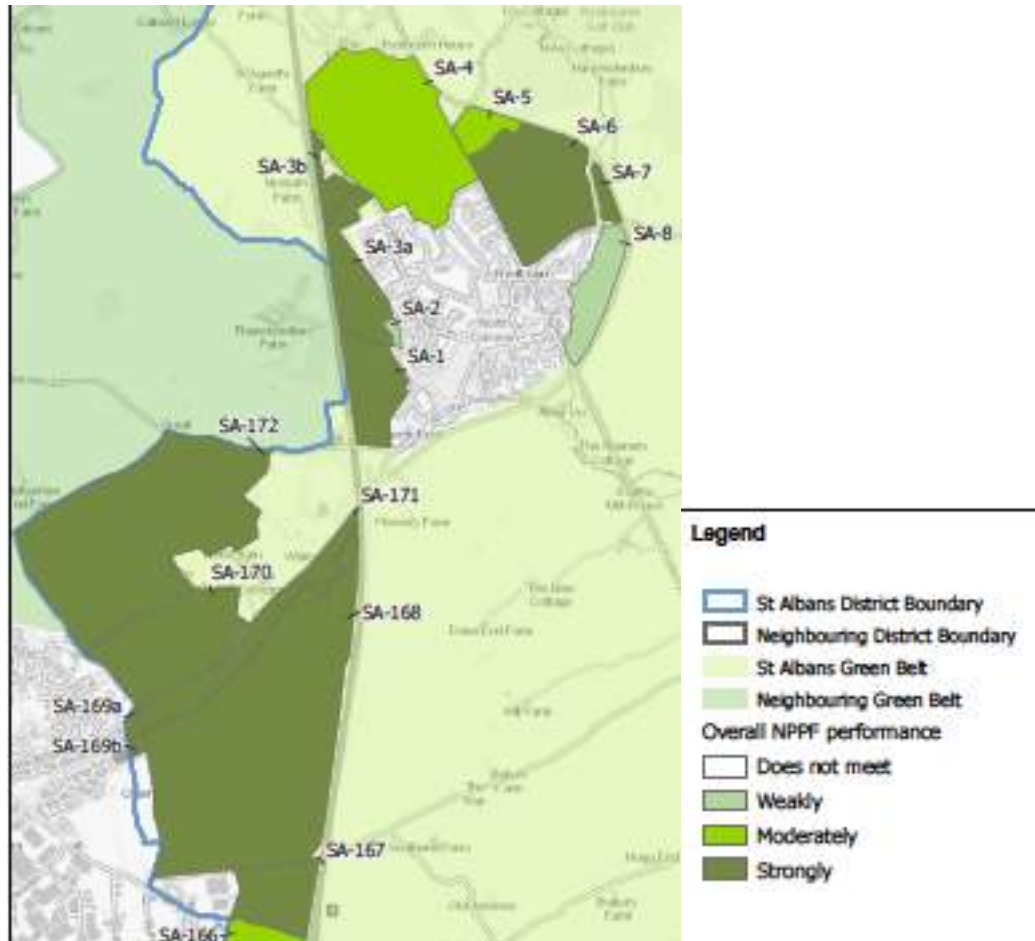


Figure 11.1: Stage 2 GBR(2023) Figure 5.11 Overall performance against NPPF purposes

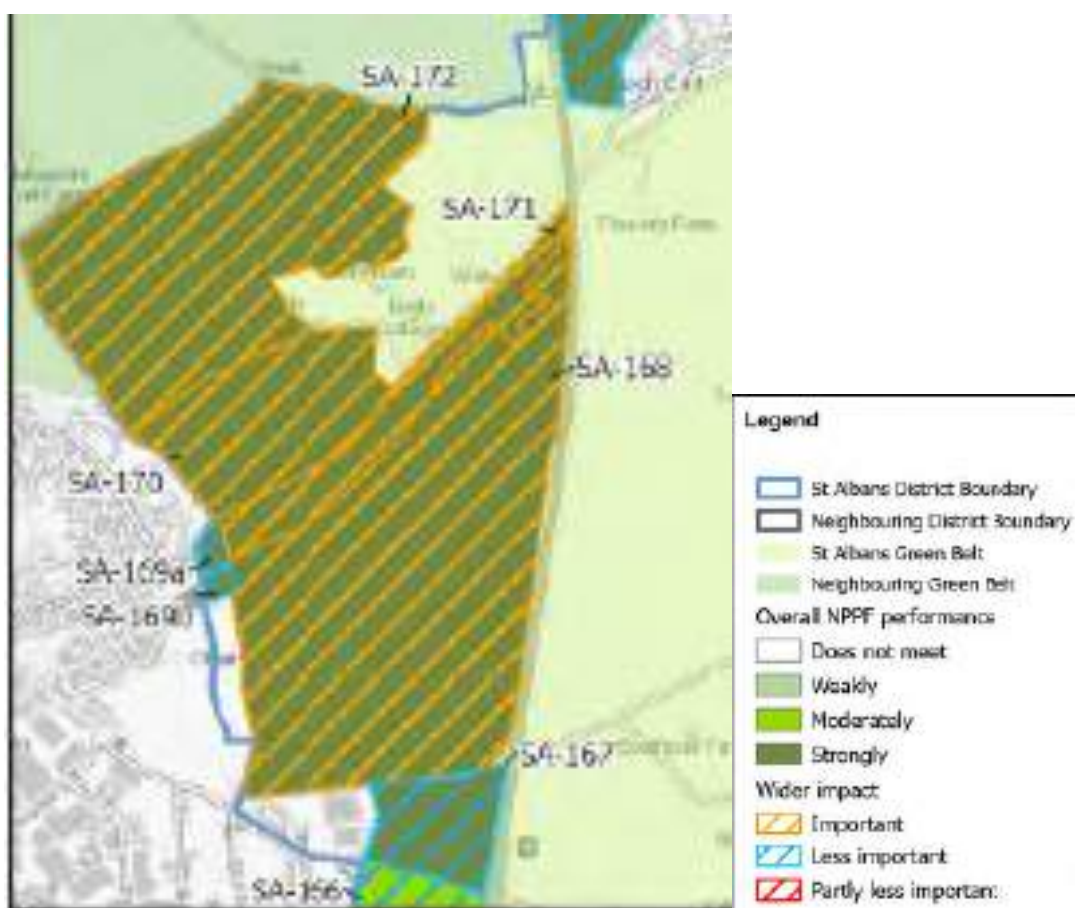


Figure 11.2: Stage 2 GBR (2023) Figure 5.15 Categorisation

Hemel Garden Communities Trajectory

- 11.5 Policy LG2 states that “the Hemel Garden Communities programme will deliver at least 4,300 new homes by 2041 and 5,500 homes in total by 2050, delivering this through a network of new garden communities to the north east and east of the town within St Albans District”.
- 11.6 Paragraph 75 of the NPPF states that: “Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites”.
- 11.7 The Draft Local Plan fails to include a housing trajectory for specific sites (including those in the Hemel Garden Communities) so that consultees can comment on the potential timing of housing delivery and the need for supporting infrastructure that needs to be delivered in close coordination for each site. This makes it rather difficult to comment on any delivery assumptions for particular sites when the Council has not considered this even though it has selected the sites as allocations.
- 11.8 However, the Draft Local Plan does include a high level housing trajectory (Table 3.2) and we have analysed this due to a lack of more detailed information presented by SACDC.
- 11.9 Furthermore, we seriously question what the Housing Trajectory is not only for the HGC sites in St Albans District but for those in Dacorum – this is not set out in the

Local Plan and is clearly a critical missing piece of information for the overall Local Plan.

- 11.10 As the Lichfields ‘From Start to Finish’ evidence (Editions 1 -3) and the Letwin Review (2018) highlight, the delays with the delivery of large development proposals should not be underestimated as there will be many aspects of the housing trajectory that are beyond the immediate control of a local planning authority. We provide an analysis of this below.

Development Lead in Times

- 11.11 The trajectory is particularly unrealistic in terms of when it assumes that housing delivery will commence at the Hemel Garden Communities. The first delivery year assumed is 2029/30 with 100 dwellings. This is in four years from now.
- 11.12 In the recently published ‘Start to Finish – How quickly do large-scale housing sites deliver’ 3rd Edition, September 2024 (Lichfields) (see Appendix B of these representations) provides an update on important research on the delivery of strategic sites across England. Its findings are that for sites of 2,000 dwellings or more (like Hemel Garden Communities) that it takes between 4 and 7.9 years from the validation of the first planning application to the first dwelling being delivered (see Table below).

Table 3.1 Lower quartile, median and upper quartile timeframe from validation of the first application to completion of the first dwelling (years) by site size

	50-99 dwellings	100-499 dwellings	500-999 dwellings	1,000-1,499 dwellings	1,500-1,999 dwellings	2,000+ dwellings
Lower Quartile	1.4	2.6	2.7	3.7	3.7	4.0
Median	2.7	5.2	4.0	5.4	5.3	6.3
Upper Quartile	5.9	9.0	6.6	8.3	6.9	7.9

Source: Lichfields analysis

Figure 11.3: ‘Start to Finish – How quickly do large-scale housing sites deliver’ 3rd Edition, September 2024 (Lichfields)

- 11.13 The Report updates the previous report on the average time taken from gaining outline permission to the completion of the first dwelling on site (see below). This indicates that it takes on average around 3 to 4.6 years from the grant of outline planning permission to deliver the first dwelling. It concludes that at the time of its granting, an outline permission will deliver limited housing in a five-year period.

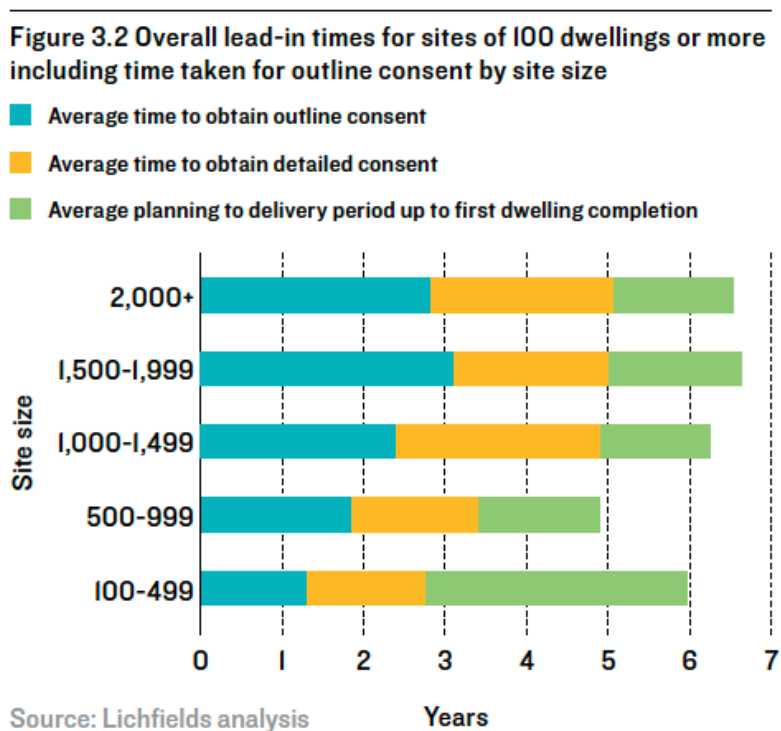


Figure 11.4: ‘Start to Finish – How quickly do large-scale housing sites deliver’ 3rd Edition, September 2024 (Lichfields)

11.14 As Policy LG2 (Support to Transformation of Hemel Hempstead) states all development in the HGC Programme Area must follow a planned and coordinated approach to growth and infrastructure and is expected to be in accordance with:

- *Local Plan Infrastructure Delivery Plans (IDPs)*
- *Hemel Garden Communities Spatial Vision*
- *HGC Framework Plan evidence base*
- *HGC Concept Plan*
- *HGC Local Plan Policies,*
- *Supporting SPDs and Design Codes.*

11.15 It requires that “Developers and promoters in the HGC Growth Areas must work together and closely with the Councils to secure a collaboration agreement which ensures an integrated and seamless approach across site boundaries. Critical infrastructure necessary to support development must be delivered ahead of occupation. Proposals must not prejudice or impede the provision of wider infrastructure required within the HGC Programme Area. Infrastructure, contributions and wider funding will be required to deliver on and offsite infrastructure, in accordance with the above documents.”

11.16 Clearly the HGC is highly complex with many authorities and parties involved in the planning and delivery process. There is also rightly a commitment to working closely with the local communities as part of this process. All of this suggests that the

Lichfields research is very much a 'best case scenario' in relation to the HGC Broad Locations.

11.17 So, we ask, what is SACDC's assumption about each of the proposed four Broad Locations at Hemel Garden Communities (H1, H2, H3, H4) in terms of the following:

- When will the Design Codes and SPDs will be prepared and approved?
- When will the pre-application process take place including consultation and engagement with relevant consultees and stakeholders?
- When will the preparatory site works, to be informed by site-specific survey recommendations and monitoring before commencement take place?
- When will an outline application be submitted and approved for each Broad Location?
- When will a full application will be submitted and approved?
- When will reserved matters applications be submitted and approved?
- There is reference in Policy LG3 (Hemel Garden Communities Growth Areas Place Principles) to the potential need to use Compulsory Purchase Orders (CPO) powers to ensure infrastructure is provided in a timely manner. What are the time estimates made for this in the housing trajectory?
- When will the S106 for each parcel is expected to be agreed?
- When will the pre-commencement conditions for each parcel be agreed by SACDC?
- What are SACDC's assumptions for the opening up works required for each of the sites and combined?
- What infrastructure is required to be funded and / or delivered prior to commencement for each of the broad locations?
- What is the planning approval process and timing for each piece of infrastructure?
- When will conditions be discharged?

11.18 SACDC needs to answer these questions so that a realistic housing trajectory can be prepared as the current version will lead to a shortfall in housing in the District over the first five years upon adoption. As a result, the borough will be subject to planning appeals due to a lack of a five-year housing land supply. With the Local Plan still yet to be submitted to the Secretary of State there is still an opportunity for SACDC to allocate additional housing sites to ensure that the shortfall of anticipated delivery is addressed.

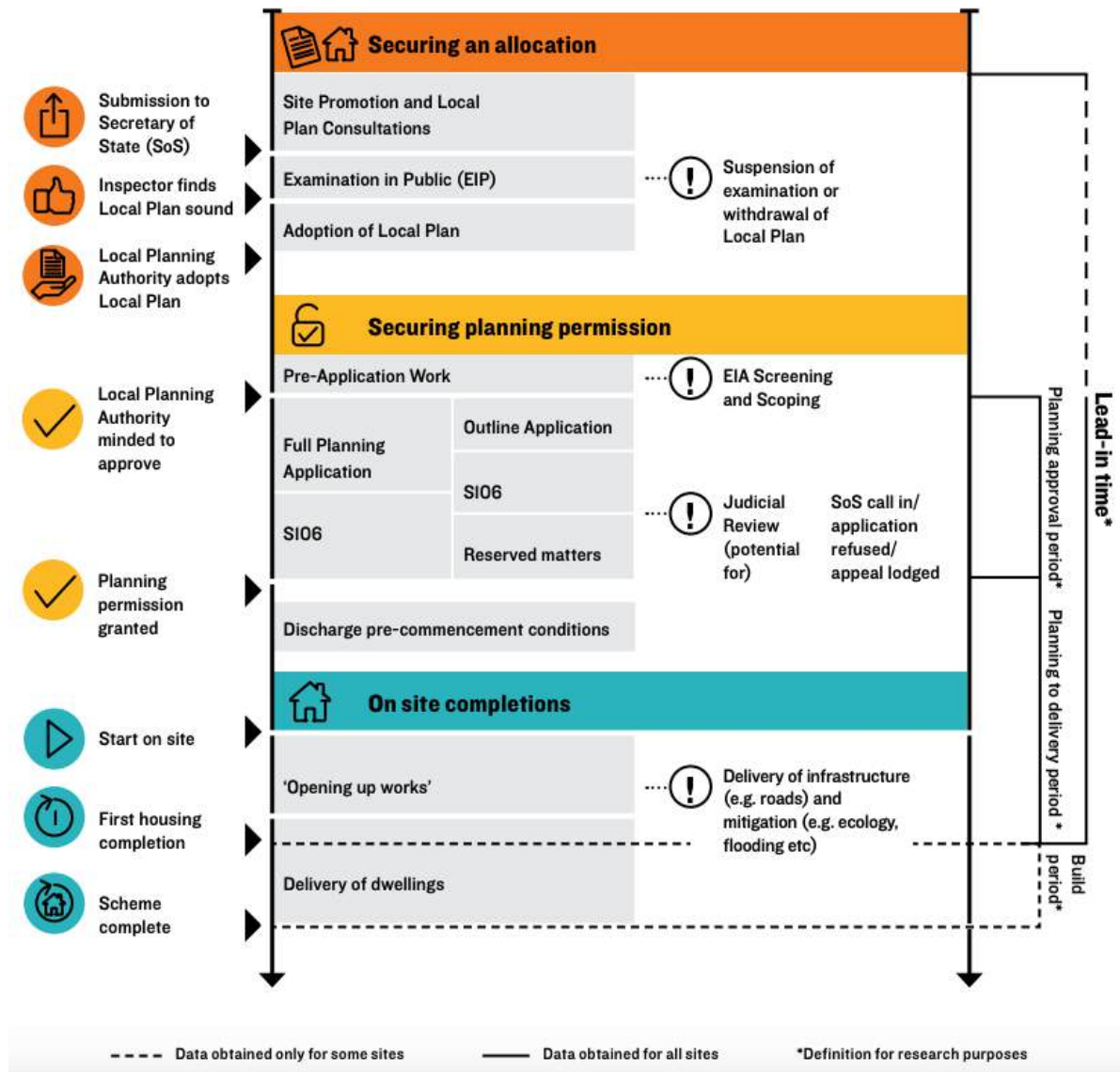


Figure 11.6: Timeline for the delivery of strategic housing sites – Start to Finish Lichfields (2024)

11.19 The additional and important benefit of this approach is that the SPDs and planning applications at Hemel are not 'rushed through' in hopes that the development will meet unrealistic commencement dates.

11.20 The report concludes that for schemes of 2,000+ dwellings the mean years from validation of the first planning application to the first dwelling being completed is 6.6 years.

11.21 Therefore, considering this research, RPC is concerned with the proposed housing trajectory, as it would not be realistic to rely on the Hemel Garden Communities development (over 4,300 dwellings) would deliver its first homes in year 6 since the adoption of the Local Plan.

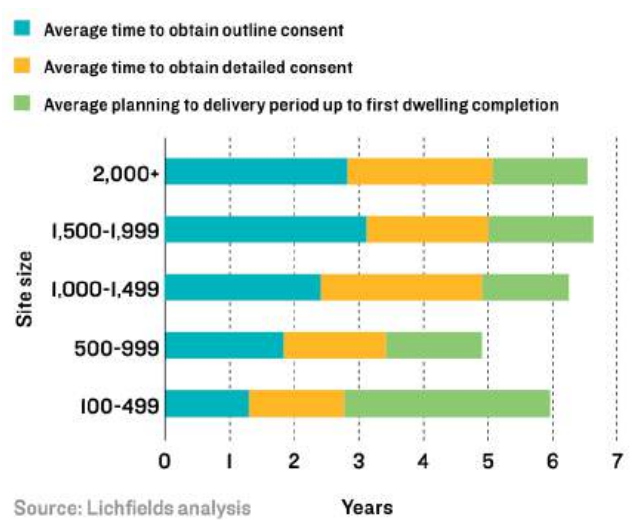


Figure 11.5: Overall lead-in times for sites of 100 dwellings or more, including time taken for outline consent size by size. Source: Lichfields report ‘Start to Finish’ (2024).

11.22 Hemel Garden Communities is clearly a cross-boundary joint working project between SACDC, Dacorum, Herts County Council and others. The South West Hertfordshire Joint Strategic Plan is being prepared with Dacorum, Hertsmere, Three River and Watford Councils and there is no agreed timetable for taking this forward (as set out earlier in our representations). This complexity and cross-boundary working is likely to slow the process down even further so the assumptions above should be considered a ‘best case’ scenario.

Housing Delivery Rates

11.23 We also question the delivery rates in the housing trajectory based on the amount of infrastructure required at each phase which still remains unclear. Linked to this is the question about how the funding of infrastructure will work? Are the developers going to forward fund infrastructure costs?

11.24 The housing delivery rates have been updated in the Lichfields report which concludes that the build-out rates for schemes of 2,000 dwellings or more is 100 to 188 dpa using the lower and upper quartiles of their analysis. SACDC’s housing trajectory assumes the following delivery rates by year for HGC which are clearly well in excess of what should be considered achievable delivery rates.

- 2029/30: 100

- 2030/31: 175
- 2031/32: 250
- 2032/33: 315
- 2033/34: 340
- 2034/35: 365
- 2035/36: 365
- 2036/37: 440
- 2037/38: 490
- 2038/39: 500
- 2039/40: 495
- 2040/41: 465

- 11.25 This equates to 4,300 dwellings over twelve years which is an average of 358 dwellings per annum. This takes no account of market or economic changes or the fact that there will be additional competing sites in the neighbouring authorities and settlements all building at the same time flooding the local market. The assumptions are simply unrealistic and are setting SACDC and its communities up for housing shortfall over the of the plan period.
- 11.26 This demonstrates that the Hemel Garden Communities sites cannot be delivered within the stated plan period of 2041 and would not make any meaningful contribution to the Council's housing needs for many years to come.
- 11.27 As highlighted, delivery will also rely on cooperation with adjoining authorities and liaison and negotiation with statutory consultees. Even the slightest delay in the start date will result in a slower performance, which is then likely to render the assumed delivery rates unachievable.
- 11.28 Overall, we consider that the preparation of a realistic housing trajectory is urgently needed, considering a more realistic start date and rate of delivery than the crude assumptions included in the Draft Local Plan.
- 11.29 The Council's poorly thought-out assumptions regarding housing delivery and an unrealistic housing trajectory result in the Draft Local Plan being currently unjustified and requiring much further evidence looking closely at what could realistically be viably delivered.
- 11.30 Policy LG2 also proposes 6,000 new jobs at an expanded Maylands Business Park. Clearly for the housing, employment, infrastructure to be planned and delivered in an integrated way, will indeed require very close coordination and alignment of resources.

Infrastructure Delivery

- 11.31 Policy LG2 states that:

“Developers and promoters in the HGC Growth Areas must work together and closely with the Councils to secure a collaboration agreement which ensures an integrated and seamless approach across site boundaries. Critical infrastructure necessary to support development must be delivered ahead of occupation. Proposals must not prejudice or impede the provision of wider infrastructure required within the HGC Programme Area..”

- 11.32 These statements do not instill confidence that SACDC has an adequate grasp on what infrastructure is required to deliver the development is proposing at Hemel Hempstead through the Draft Local Plan, who will be responsible for delivering it, its timing and its cost. It is entirely unclear from this statement what infrastructure projects SACDC is seeking contributions.

Transport Infrastructure

- 11.33 In relation to 'transport infrastructure the IDP states (paragraph 9.1.6) that:

“One of the core principles of the Garden Community is to deliver transformative mobility improvements to achieve a significant shift towards active and sustainable modes of transport. Whilst a significant amount of baseline information has been collected to support the development of the sections below, there are a number of evolving transport studies and strategies that are not yet completed that will identify and evidence the transport interventions required to support behaviour change in a shift to sustainable modes. These will need to be incorporated into future iterations of this IDP.”

- 11.34 The fact that the delivery of mobility improvements to achieve a significant shift towards active and sustainable modes of transport cannot be evidenced through the IDP due to a number of evolving transport studies and strategies being incomplete raises serious concerns about the deliverability of this infrastructure. To simply state that these will need to be incorporated into future iterations of the IDP provides no confidence that there is a sound transport infrastructure evidence base on which the plan is based.

- 11.35 The IDP provides an *“inexhaustive list of planned highways infrastructure projects, as included in the St Albans IDP Infrastructure Schedule, of most relevance to the Hemel Garden Communities”*. It then provides two bullet points which are:

- M1 junction 8 enhancement (Phases 1 to 3)
- Access enhancements to support development at Hemel Garden Communities

- 11.36 This is clearly not sufficient information. We sought clarification on the highways infrastructure in the IDS however the information appears to be incomplete and it is very difficult to ascertain using the IDS spreadsheet which is not at all 'user friendly'.

- 11.37 Reference 141 of the IDS is for Highways Access to support development at East Hemel which includes transport measures as part of M1 J8 Enhancements:

Sub Topic	Project Name	Project Description
Highways	Highways Access to support development at East Hemel Hempstead (Central) - (Including transport measures as part of M1 J8 Enhancements)	<p>Associated access and highway requirements to support development at East Hemel Hempstead including Sustainable Transport Corridor. This forms part of the package of transport measures for M1 J8 enhancements including prioritisation of active and sustainable modes of travel.</p> <p>Land will be safeguarded for provision of active travel and cycle bridge across the A414 (Phase 2 J8 enhancement) and access improvement associated with Junction 8 of the M1 motorway. Land to the east of Junction 8 is safeguarded, in case it is required to come forward for junction improvements (Phase 3 J8 enhancements)</p>

Figure 11.6: IDS Reference 141

11.38 Yet when looking for the estimated costs there is no estimation despite it being a Critical piece of transport infrastructure. Furthermore, the time period for its delivery is stated as 2025 – 2041. That is a very wide period of time which indicates that SACDC simply does not know the cost or when it is likely to be delivered let alone what development will trigger its necessity for delivery.

Low	High	Estimated Cost	Cost to be apportioned	Funding Source	Priority
N/A	N/A	N/A*	N/A*	County Funding / Developer Contributions	Critical - Delivery

Figure 11.7: IDS Reference 141

11.39 There are many other examples of this in the IDS which do not need to be highlighted as there is clearly a fundamental issue with the IDP and IDS in that they lack the required information to demonstrate the allocations are sound and deliverable. Based on the current information available there is nothing to suggest that the infrastructure to support the growth at Hemel is sound or deliverable.

Rail Services

11.40 The IDP states at Page 188 that:

“The proposed expansion of Hemel Hempstead is likely to have an impact on the nearby railway stations (Hemel Hempstead station and Apsley station) and the need

to improve and expand station facilities, as necessary, to reflect increased demand for rail services has been raised in the engagement as a concern.”

- 11.41 *“Further details are not yet developed as to exactly what new or improved infrastructure is required to facilitate this increased demand”.* Again, a key piece of required infrastructure has no evidence on what is needed or its cost etc.

Bus Services

- 11.42 The IDP explains at Page 189 that:

“Initial investigations undertaken with developers suggest that new bus routes could be introduced, and existing routes expanded to link the HGC developments with both Hemel Hempstead (including the train station, which will provide further, regional public transport connectivity) and St Albans City”.

- 11.43 *“Initial investigations”* are not sufficient to justify the proposed allocations and evidence deliverability and soundness.

Walking and Cycling Infrastructure

- 11.44 Whilst it is important that there is sustainable and safe walking and cycling infrastructure delivered as part of the allocations there is quite a contrast in the level of detail provided in the IDP and IDS for these schemes compared to the strategic transport requirements. It is helpful to have this detailed level of costings and projects for walking and cycling infrastructure however it is currently very much an ‘incomplete picture’ of the full range of strategic transport measures required and how, when by whom and their cost.

Physical Infrastructure

Potable Water

- 11.45 Paragraph 9.2.1 of the IDP explains that there is no modelling yet for the possibility that a new water supply network might be required for HGC and that there could be cross boundary issues with the supply of potable water. This does not appear to be covered in the IDS.

“It is possible that new water supply network infrastructure will be required when connecting large allocations like Hemel Garden Communities. However, this will be modelled as sites are brought forward by developers. During stakeholder engagement in May 2023, Affinity Water suggested that the pressure due to development at Hemel Hempstead will be increased by the growth in bordering local authorities. Cross-local authority boundary sites are most likely to encounter issues when connecting to the supply and timing and phasing of how these sites are brought forward should be aligned and considered when applying to Affinity Water for connection to the supply network.”

Waste Water

11.46 The IDP explains (paragraph 9.2.2) that

“The strategic upgrades to wastewater treatment works outlined in Section 8.1.2 will also apply to Hemel Garden Communities. Consequently, as indicated during stakeholder engagement with Thames Water, Hemel Garden Communities is not likely to cause significant issues on the wastewater network and therefore capacity is expected to be available to support the growth.

“Similar to potable water, because the preferred growth scenario includes significant greenfield urban extension proposed allocations it is likely that these will need new infrastructure in order to connect to the network. However, this is determined on a site by site basis, and therefore it is important that applications for new infrastructure are provided sufficiently in advance for Thames Water to be able to provide necessary upgrades”

11.47 However, when one reads Section 8.1.2 as referred to by the consultants there is nothing in that section that specifically refers to the growth planned for HGC. Saying that new infrastructure is likely to be needed for ‘significant greenfield urban extensions’ and that the infrastructure will be determined on a site-by-site basis is setting up the Plan for failure. There needs to be an assessment of what the wastewater requirements are for the whole of the HGC and a plan for how it will be met, how much it is who will pay for it, where it will be located and when it will be needed.

Energy (Gas and Electric)

11.48 The IDP states (aragraph 9.2.3) that:

“Currently, there are no reported infrastructure capacity issues within the Hemel Garden Communities, according to information published by UK Power Networks and Cadent. However, Cadent has indicated that a new intermediate pressure regulator will be necessary if there is a surge in residential demand”

11.49 It is concerning that the IDP and IDS has not considered the utilities required at Hemel Garden Communities as this is clearly a very key consideration for the area given the presence of the Buncefield Oil Storage Depot, the BPA Gas Pipeline that runs north and south through the site, and the on-site Overhead Electricity Transmission Lines and the new utility infrastructure (including Wastewater Infrastructure) that is required.

11.50 As one can see from the mapping below, there is significant utility infrastructure located east of Hemel Hempstead and around Redbourn (including west of Redbourn). Nowhere in the Local Plan or in the evidence base does it explain how the existing utility infrastructure is going to be addressed as part of the proposals despite this being a clear strategic matter that should be considered a potential ‘showstopper’ to development proposals at Hemel Hempstead and Redbourn. This includes:

- National Grid Sundon-Elstree (400kv) pylons and line running north to southeast of Hemel Hempstead.
- Elstree – Sundon (132kv) pylons running north to south and east to west including to the east of the M1 (west of Redbourn).

- Buncefield Oil Terminal.
- Epping to Buncefield Oil Pipeline located east of Hemel Hempstead looping around the settlement to the north and west.
- Finaline (Killingholme – Buncefield) located north of Redbourn, running along the western edge of Redbourn, continuing south until crossing the M1 to Buncefield Oil Terminal.

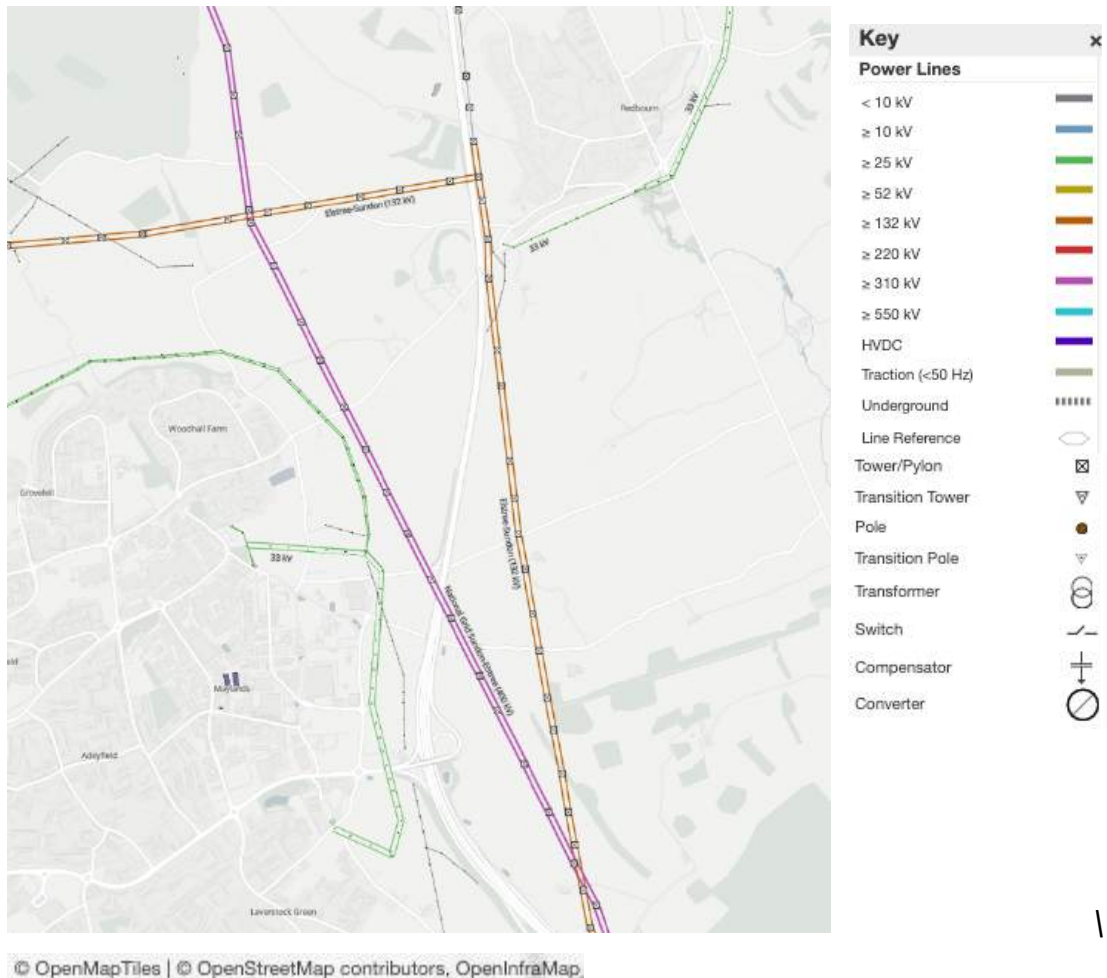


Figure 11.8: Electric Transmission Lines east of Hemel Hempstead and at Redbourn
 Source <https://openinframap.org/#12.99/51.76249/-0.39699>

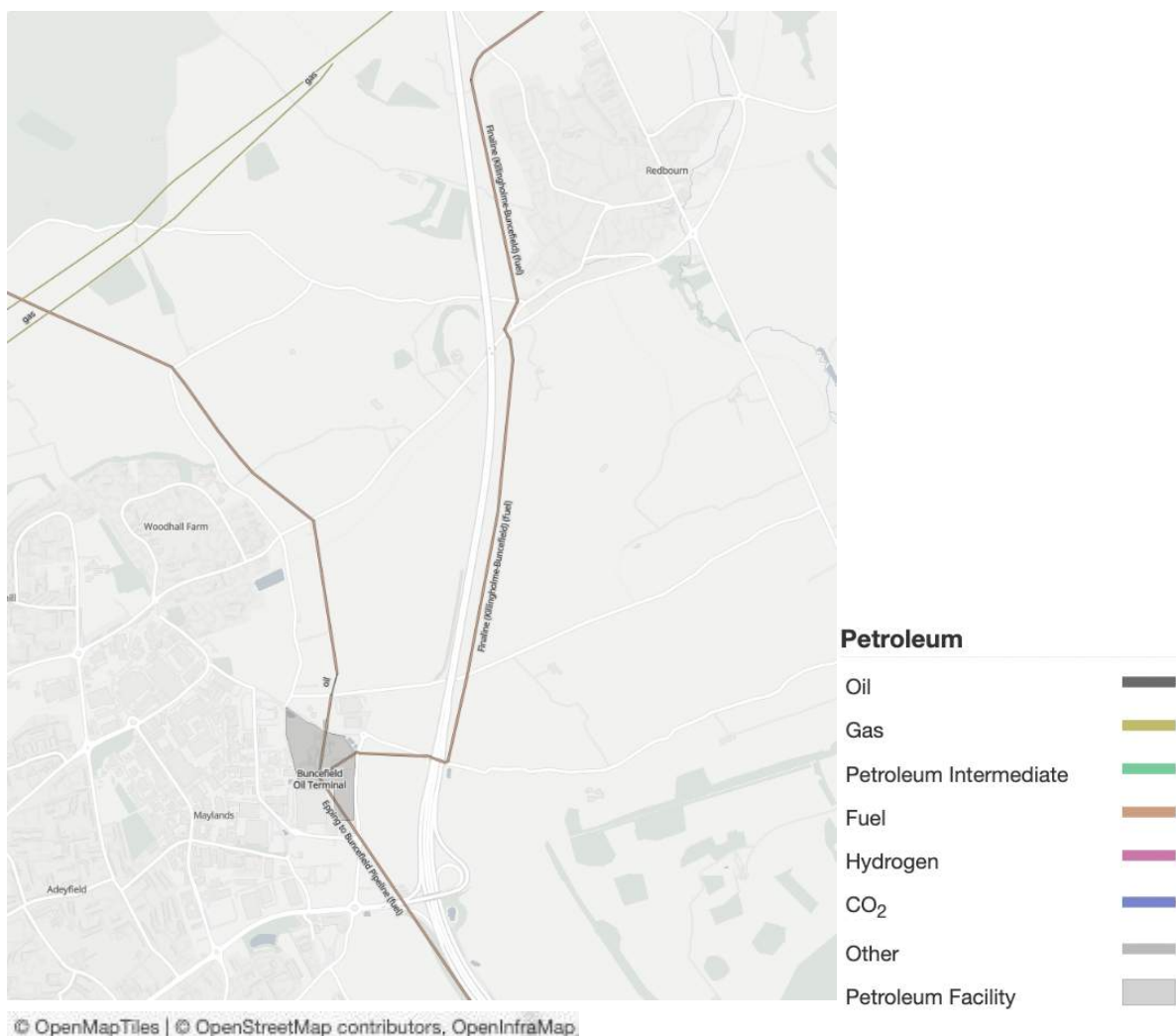


Figure 11.9:: Oil and Gas Pipelines at Hemel Hempstead and Redbourn Source: <https://openinframap.org/#12.99/51.76249/-0.39699>

Viability

- 11.51 It is currently unclear how the Local Plan Policies, the IDP / IDS and the Local Plan Viability Assessment (September 2024) relate to one another. The information contained in each of these documents is not clearly set out anywhere for each allocation at HGC in terms of the infrastructure requirements, their costs, when it is necessary, and who will be delivering it.
- 11.52 For example, the Viability report Strategic Sites Testing for East Hemel (North) includes the following assumptions for S106 contributions:

Contribution description	Contribution	Comments on contribution
Education	£17,719,763	1 x 3 FE Primary (assumes c. £17.20m per primary school equating to c. £3,222 per unit across the 3 x Hemel sites)
	£14,566,097	1 x 6-8 FE Secondary (assumes c. £48.50m per secondary school equating to c. £8,883 per unit across the 3 x Hemel sites)
Healthcare	£9,190,000	Based on ARUP Costings
Sports & Community	£4,071,272	Based on Arup Costings
Green infrastructure: Country Park/SANG	£630,480	Based on ARUP Costings
Local open/play Space/Green Infrastructure	£1,569,365	Based on ARUP Costings
Transport Infrastructure	£29,619,640	£6,826 per home for active travel (index linked in accordance with HCC developer contributions toolkit) £11,000 per home for transport requirements (e.g. Highways) £385,000 for mobility hub
Total	£76,981,617	-

Figure 11.10: Strategic Sites Testing Table 3.2.14.1: Section 106 contributions

- 11.53 However, when one attempts to reconcile these figures in the IDP / IDS it is not possible to do so.
- 11.54 It is unclear in the viability evidence how cross-boundary infrastructure is being calculated. When one reviews the Hemel Garden Communities Delivery Statement (September 2024) there are a range of cross boundary schemes that are ‘key transformational projects’ (see below). How are these being treated in the viability evidence base?

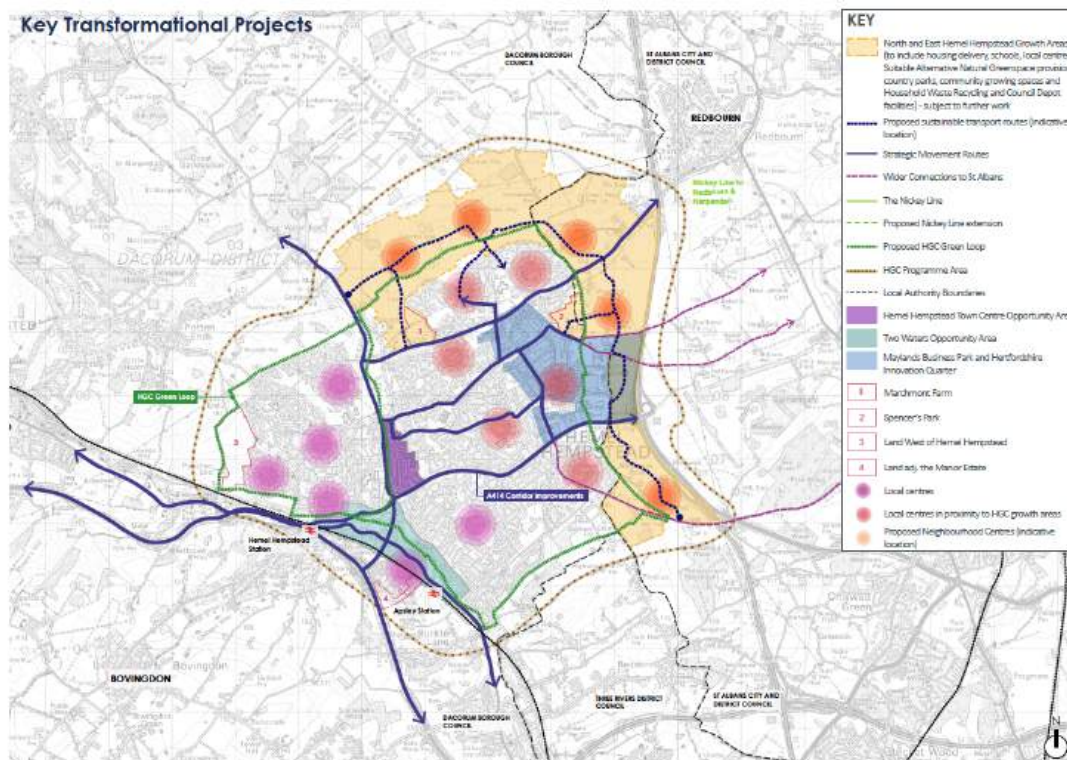


Figure 8 Map indicates key transformational projects across the existing town of Hemel Hempstead and the proposed growth areas (July 2023)

Figure 11.11: Transformational projects Hemel Garden Communities (HGC) Delivery Statement (September 2024)

11.55 The Local Plan states that

“The Spatial Vision for Hemel Garden Communities sets out the scope for transformation across the town, as well as providing a sustainable approach for growth, in accordance with the Town and Country Planning Association (TCPA) Garden City Principles”¹¹

11.56 We question how the TCPA Garden City Principles are taken into account in the viability evidence. For example:

- Land value capture for the benefit of the community
- Community ownership of land and long-term stewardship of assets

11.57 Furthermore, we are unclear as to how the viability evidence has taken account of all the requirements of the Local Plan Policies including Policy LG3 (Hemel Garden Communities Growth Area Place Principles). This policy includes a number of requirements for the developers and it is unclear how these have been costed.

11.58 Policy LG6 (Green Belt Compensatory Improvements) requires that the allocations in the Local where Green Belt boundaries are changed that ‘proportionate’ compensation is required. What assumptions have been made about this in the viability evidence base as this is clearly a costly requirement for Green Belt release allocations particularly that at Hemel.

¹¹ TCPA Garden City Principles <https://tcpa.org.uk/garden-city-principles/>

12 Policy LG3 (Hemel Garden Communities Growth Areas Place Principles)

- 12.1 We are supportive of the need for development to conform to Place Principles for Hemel Garden Communities and consider that these do need to be set out in Policy. However, it is critical that the principles are not simply a 'wish list' of generic statements and that the Principles are place specific and that they are viable and deliverable.
- 12.2 Whilst we clearly would like to see the quality development that would result from planning and delivering development in line with Garden City Principles we would expect SACDC to carefully consider this in more detail and how deliverable they are.
- 12.3 The Inspectors of the Uttlesford Local Plan – which proposed multiple new garden settlements and stated that the new settlements would need to be developed in line with 'garden city principles' found that there were no mechanisms in place to ensure that the garden city principles could and would be delivered by the developers. They stated in their letter: *"Without assurances that the necessary mechanisms outside the plan would be put in place, we cannot be content in principle that the new proposed settlements would be true Garden Communities, or that the plan's stated vision for these new settlements would be met. This is a serious concern."*¹². We have the same concerns for the St Albans Draft Local Plan in respect of the purported application of 'Place Principles' with no concrete mechanisms for actually delivering development in this way and no evidence to justify it.
- 12.4 We note that one of the principles is to *"Minimise the impact on the surrounding landscape setting and delivery of an average of 40 net dwellings per hectare"*. We consider this to be unjustified and applying an 'average housing density' across the whole of the HGC could lead to adverse landscape impacts in areas where a much lower density is required. Using an 'average density' could be misinterpreted by developers and lead to inappropriate densities and over development.

¹² Uttlesford Local Plan Inspectors' Letter (10th January 2020)
<https://uttlesford.moderngov.co.uk/documents/s17756/Appendix%201%20-%20Inspectors%20Letter.pdf>

13 Policy LG4 (Large, Medium and Small Sites)

Site M6 South of Harpenden Lane, Redbourn

13.1 Policy LG4 includes site M6 - South of Harpenden Lane, Redbourn as a Medium Site in Part B of the Draft Local Plan. It indicates 68 dwellings. RPC has several concerns regarding this site which we set out below.

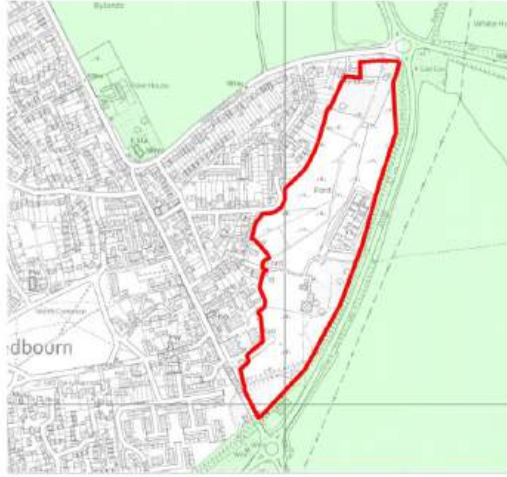
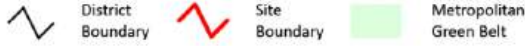
M6 – South of Harpenden Lane, Redbourn, AL3 7RQ		
Parish / Ward	Redbourn	Allocated site boundary
Hectares	12.04	
Proposed use	Housing 68 units (indicative)	
Proforma Ref	M-016	
HELAA Ref	R-18-21	
Green Belt Sub Area Ref	SA-8 / RA-4	
		

Figure 13.1: Extract of allocation policy M6, Part B Draft Local Plan.

13.2 A key concern is the fact that half of the site is located within Flood Zone 3 and 2. RPC has reviewed the published Level 2 Strategic Flood Risk Assessment and the Site Selection Proforma Sheet, and we are concerned to confirm that approximately half of the site is within flood zones 2 and 3a and 3b, which is a considerable amount of allocated land at risk of flooding. Furthermore, over 40% of the site is at risk of surface water flooding and there are areas of the site that suffer from groundwater flooding too.

13.3 Importantly, flood risk zones 2 and 3 run through the site, from its north boundary to the south boundary, cutting the site into two narrow parcels of land at each side, which would be within flood risk zone 1. RPC is concerned that the Council has not given enough consideration to floor risk and its spatial distribution within the site in the consideration of the size of the proposed allocation nor in the quantum of development allocated for.

13.4 We are of the view that a 68 dwellings development in this location would have serious viability and deliverability issues. This is due the reduced space for development and the split of the site into two narrow sites for development, which would jeopardise the number of homes delivered as well as layout and building design. Has the Council considered the potential capacity of this site considering other development plan policies? Is there sufficient and adequate space for a development to comply with other Draft Local Plan and made Redbourn NDP policies?

13.5 Shallow groundwater means that Sustainable Drainage Systems (SuDS) based on water infiltration and attenuation are unlikely feasible where groundwater is close to surface. This would have implications in the design of layout, open space and drainage solutions for the site, which take a significant amount of land and considering the very limited area safe from flooding, there would be even less space available for actual development (homes).

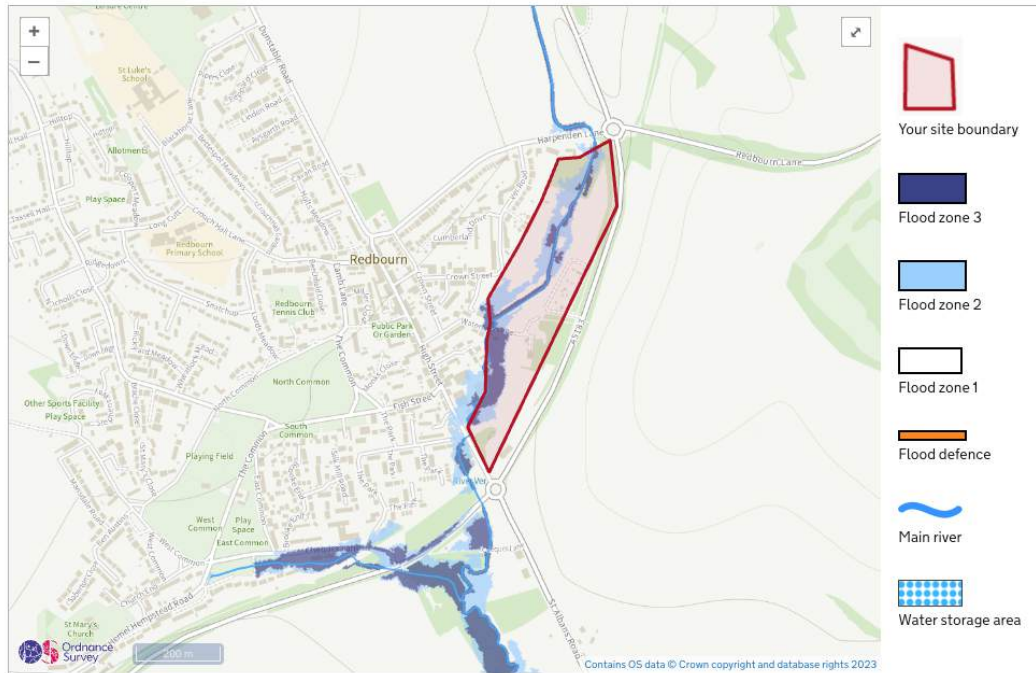


Figure 13.2: EA Flood Map for Planning

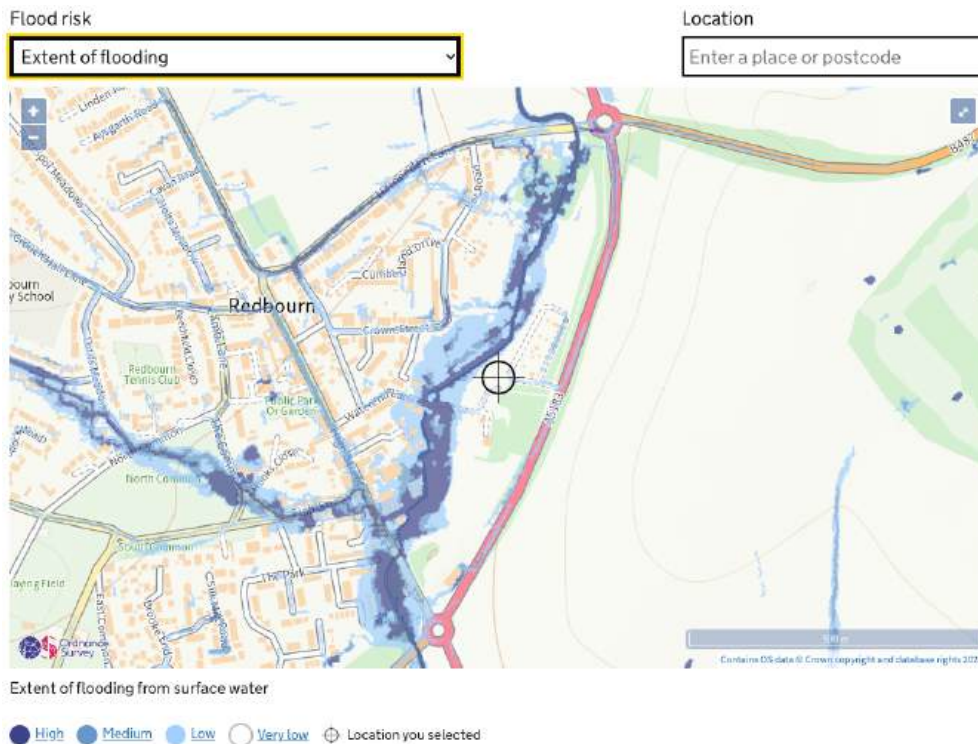


Figure 13.3: EA Flood Map for Planning (Surface Water)

13.6 We have reviewed the Council’s Site Selection Proforma (M-016) and have concerns with the lack of an evidence-based and unbiased qualitative assessment of the site.

- Much of the site is affected by flood risk, reducing developable areas and reducing the opportunities for effective and efficient layout and building design, including the feasibility of SuDS.
- This site is heavily constrained by the large proportion of land at risk of flooding that bisects the site, but also by the A5183 Road along the eastern boundary, which impedes developing the site with homes immediately up to the eastern boundary. Some distance and noise mitigation feature may be required in order to provide a safe and healthy environment to future residents.
- Additionally, the Site Selection Proforma Sheet confirms that the site contains deciduous woodland (priority habitat) in the south, east and north, along with a woodland TPO and an area TPO in the south. Clearly, these woodland and trees would have implications in the development management stage of the development, as any development would have to comply with statutory biodiversity net gain (BNG), and these areas, being priority habitat, would score high in any BNG assessment.
- The site scores strongly on Green Infrastructure Corridors. This may be as the site is not part of any specific Green Infrastructure Corridor designation, but the site forms part of the Green Infrastructure network. A simple assessment of the habitats within the site (deciduous woodland and grass), the River Ver and its riparian habitats would be enough as to understand that the site forms part of a wider Green Infrastructure network along the river, expanding to the north and south of the site, following the river. We consider that the site should score weakly on Green Infrastructure for the reasons above.
- The proforma also states that part of the site is contaminated, and given current national and local policies, assessment of the contamination and any necessary decontamination would be required prior to developing the site for residential use.
- Noise is missing in the assessment.

13.7 These environmental constraints are not given sufficient weight in the proforma assessment, as they are merely outlined, but the Council is failing to explain how a 68 dwellings development could take place within the site with the heavy constraints that is subject to. Therefore, RPC considers that the site should not be recommended to progress any further unless and until the above issues are addressed.

13.8 The Draft Local Plan - Part B (Local Plan Sites) sets out 10 Key Development Requirements. We make the following comments in response to this which does not in any way mean that the Parish Council is supportive of this proposed allocation as currently proposed:

- Safe access for all modes of transport should be required in the allocation policy, and this should include that it should be provided as well in the context of an exceptional flooding scenario.

- The wording of the policy and the requirement about the existing trees is not strong enough and it should be strengthened to ensure that existing trees are retained and are part of the design process.
- The proposed wording should strongly refer to a direct link to the Nickey Lane as a requirement prior the development takes place and to design this access so it is accessible for all users.
- The wording of the conservation area requirement is not effective. This requirement should aim for development, thought layout, building and public realm design, to conserve and enhance the significance of heritage assets and their setting, not to minimise harm. IT should not only refer to layout design, but to public realm and building design too.
- The reference to the River Ver is insufficient, and this policy should require integration of the River Ver into the design of the scheme, making the river publicly accessible and part of the landscape strategy for the site and its public realm.

13.9 RPC objects to the proposed allocation site M6 (Land South of Harpenden Lane), as the allocation has not been informed by unbiased and sufficient evidence, the assessment of evidence carried out by the Council is clearly insufficient. This policy is unsound due to it being ineffective and its wording is ambiguous, it is not justified and based on proportionate evidence and it is inconsistent with national policy.

UC33 Land Rear of 53 Snatchup, Redbourn

13.10 RPC is supportive of the proposed allocation and has no concerns with the principle of this allocation and the proposed quantum of development.

13.11 We would like to comment on the key development requirements:

- It would be advised to amend the requirement on access to ensure that the access is designed for all users, not only for vehicular users. This is particularly important as this is the only way to access the site and pedestrians and cyclists would share the access with cars.
- Rather than only “taking account of existing trees”, we expect a more robust policy wording requiring increasing the tree cover of the site through development to ensure that it contributes to microclimate regulation and climate change adaptation.

14 Policies SP4, HOU1, HOU2, HOU6 (Housing)

14.1 Strategic Policy SP4 should clearly set out the amount of housing to be delivered over the plan period by tenure yet it is a very generic policy that is not effective and unjustified as it is not supported by sufficient evidence as currently worded.

14.2 We have reviewed the published South West Herts Local Housing Needs Assessment Update (March 2024) and we have concerns with the housing policies that we explain below.

Policy HOU1

14.3 Policy HOU1 states that new residential developments should provide a) a mix of dwelling types and sizes to meet the needs of current and future households. Unfortunately, this wording is not clear or specific enough, and it is only developed into a specific mix requirement in point b) of the policy, but it limits its application to developments of 10 and more dwellings.

14.4 In light of the above, we consider Policy HOU1 not being adequately worded where it refers to housing mix for developments of less than 10 dwellings, as it fails to require a specific mix that would contribute towards providing small and medium size homes. The supporting text of the policy acknowledges that St Albans District has a high proportion of large dwellings in its housing stock (paragraph 4.4), but regardless of this, policy HOU1 does not require any specific housing mix for small sites (less than 10 dwellings). The Draft Local Plan allocates development in SACDC for at least 190 dwellings which would fall within sites of less than 10 dwellings each, therefore the Council is missing the opportunity to correct the district's housing mix in 190 cases through its allocations only, to which one would have to add all small windfall sites that would be brought forward in the plan period.

14.5 It is worth to mention that the South West Herts Local Housing Needs Assessment Update Report is the only housing need assessment evidence provided by the Council. This report recommends a mix of homes for the whole South West Hertfordshire area, not making district-specific recommendations in terms of housing mix for St Albans.

14.6 The latest mix (Reg. 19 Draft Local Plan) has been amended from the previously proposed mix (Reg.18), and the proposed mix departs now further from the recommended mix in the table below. The Council has not provided any additional St Albans's district specific evidence that would inform this change in the mix and has not justified the change in the supporting text.

Table 8.27 SW Herts - Recommend Mix

	Market	Affordable home ownership	Affordable housing (rented)	
			General needs	Older persons
1-bedroom	5%	20%	20%	50%
2-bedrooms	20%	40%	30%	50%
3-bedrooms	45%	30%	35%	
4+-bedrooms	30%	10%	15%	

Figure 14.1: South West Hertfordshire recommended housing mix. South West Herts Local Housing Needs Assessment Update Report (March 2024).

14.7 In this regard, RPC considers that policy HOU1 is not being effective in addressing the housing mix need, raised by Council in their own evidence and supporting text of the policy, by not providing a housing mix that responds to the actual demand in terms of the size of homes, as it only requires a specific housing mix to developments of 10 dwellings and more. This would lead to a significant amount of development outside of the application of policy HOU1, with no justification or evidence to demonstrate the rationale for missing this. There are precedents elsewhere in the country where housing mix requirements in terms of size of homes applies to all new development proposals, proportionately, regardless of the scale of the development.

14.8 For the above reasons, due to the **lack of effectiveness and the insufficient justification and evidence to support the proposed policy text, RPC considers this policy to be unsound.**

Policy HOU2

14.9 Policy HOU2 relates to affordable housing requirements and similarly to policy HOU1, we consider it to be ineffective due to the lack of a specific affordable housing requirement to development proposals below 10 dwellings.

14.10 There are 31 sites allocated for residential development in the Draft Local Plan for less than 10 dwellings. This means that the Council is purportedly not requiring affordable housing contributions to these 31 future development proposals, which could easily deliver affordable housing proportionately to remain viable. Other development plans in the country require specific affordable housing contributions to smaller sites, in a proportionate manner and with reduced requirements from the general 40% on-site affordable housing provision. However, SACDC has not explored this option.

14.11 St Albans District has the highest affordable housing need in South West Hertfordshire (see table below) but the SACDC has decided not to require affordable housing contributions from developments under 10 dwellings. This is not just unfortunate as there are 31 allocated sites that could potentially contribute towards affordable housing, (together with windfall sites), but also because these smaller sites are usually infill sites. These are usually located in more sustainable and accessible locations that contribute towards the affordability of residents by having access to services, facilities, employment and public transport nearby, rather than being located on the edge of settlements where there is a higher dependency on car use.

14.12 It is also worth to mention that the affordable housing policy HOU2 does not set out a minimum amount of affordable housing to be provided during the plan period. There is no target informed by affordable housing need, and therefore it is not clear how the Council has arrived at the conclusion that policy HOU2 will be adequate to deliver the necessary affordable housing to meet the need. In this case of lack of evidence and transparency, we are of the view that **policy HOU2 is not based on sufficient evidence and lacks justification as currently worded. Furthermore, this policy is inefficient in delivering the affordable housing to meet the need. For the above reasons we consider policy HOU2 to be unsound.**

Table 7.53 Overall Annual Affordable Housing Need

	Rented Affordable Need	Affordable Home Ownership Need (pa)	Total Affordable Need
Dacorum	494	243	737
Hertsmere	433	156	589
St Albans	449	353	802
Three Rivers	364	163	527
Watford	518	150	668
SW Herts	2,258	1,065	3,323

Figure 14.2: Table 7.53 of the South West Herts Local Housing Needs Assessment Update Report (March 2024).

Policy HOU6 (including Gypsy and Travellers)

14.13 The supporting text to Policy HOU6 states: "Evidence shows that there are future accommodation needs of Gypsies and Travellers over the Plan period. The Plan therefore provides additional accommodation opportunities [...]". However, the supporting text and the Policy does not explain what evidence is being referred to and it does not state what the actual need is for Gypsies and Travellers and the need for Travelling Showpeople. The Policy states that the Council to provide for the accommodation needs of Gypsies and Travellers and Travelling Showpeople the Council will:

"a) Consider proposals for new accommodation with regard to the potential and suitability of the following:

i. New sites as part of Broad Locations for development that should accommodate a maximum of 20 pitches (each pitch being designed to accommodate 1 family / household);

ii. Reconfiguring or extending existing sites; and

iii. Sites with temporary permissions."

14.14 It appears from this Policy that SACDC is not identifying sites and seeks to rely on a criteria-based policy. However, this criteria-based policy is not effective and not justified. Firstly, it does not set out a specific prioritisation of what constitutes the most suitable site: are new sites the priority over existing sites? Are new Broad Locations the Council's priority to deliver new sites? Is the extension of existing sites a priority? And temporary permissions? In the case that the Council's priority is the order of the three points (i, ii,

and iii), which is not clear in the policy text, is the priority for Broad Locations first when there may be suitable extensions of existing sites or sites with temporary permission? What is the justification for this?

14.15 The Policy then goes on to state: *"Based on a variety of factors including proximity to the road network most used by Gypsies and Travellers; development site scale; area topography and landscaping opportunities; and the wide range of uses to be provided in the Broad Locations for development; require provision of the following new sites will be required:*

East Hemel Hempstead (South) Broad Location - one 15-20 pitch site

East Hemel Hempstead (Central) Broad Location - one 15-20 pitch site"

14.16 It appears from this section of the Policy that SACDC is attempting to concentrate all of the Gypsy, Traveller and Showpeople provision East of Hemel Hempstead. This would lead to even further concentration of sites already in the area including the existing site at Tullochside Farm, which is between Hemel Hempstead and Redbourn. The suggestion that up to 40 pitches could be delivered at East Hemel Hempstead would be close to the existing Three Cherry Trees travellers' site in Dacorum.

14.17 It is important to note that the Regulation 19 Dacorum Local Plan also proposes 8 additional pitches at North Hemel (see paragraph 3.26 and Strategic Policy H5 - The Travelling Community below) :

"However, more pitches are required to meet the need in full. Therefore, we have identified an additional site within the larger housing allocation at North Hemel for 8 pitches. This will be close to existing and newly emerging services and facilities, and is better placed to meet the needs arising locally from the Three Cherry Trees Lane site". (paragraph 3.26)

Committed and Allocated-Travellers Sites

3. The target for new pitches for Gypsy and Travellers who meet the planning definition will be met through the provision and management of permanent new sites in the following locations:

Table 5 Allocated and Committed Sites for Gypsies and Travellers

Settlement	Location	No. of pitches
Hemel Hempstead	West of Hemel Hempstead	7
Hemel Hempstead	Hm14 Marchmont Farm	5
Hemel Hempstead	Hm01 North Hemel Hempstead Growth Area	8

Figure 14.2 Dacorum Regulation 19 Local Plan Policy H5 – The Travelling Community

14.18 This will clearly lead to an over concentration of new sites and pitches for Gypsies and Travellers without demonstration that this strategic location is in proximity to future needs.

14.19 As we establish in these representations, the delivery of Hemel Hempstead related development is likely to take much longer than the Draft Local Plan assumes. Therefore, seeking to locate the need at East Hemel Hempstead may not meet the need when it is required. SACDC should consider other locations for meeting the needs of the district.

14.20 For the reasons raised above, RPC considers policy HOU6 to be **unsound as it would not be effective, it is not positively prepared and justified.**

15 Employment

South West Herts Economic Study (2024)

15.1 The South West Herts Economic Study (2024) is the key strategic evidence base for employment in the District and wider sub region.

15.2 Its findings are that the office market may not recover to reach ‘a new normal’ where demand for office space begins to increase again. It explains that:

“This does not mean there will be no demand for offices. The study shows there is still demand for smaller offices, and particularly high quality offices in the main office markets of Central Watford and St Albans. However this is unlikely to be enough to offset the fall in demand for large floorplates”.

15.3 Therefore, there is effectively no strategic demand for new office space / land.

15.4 However, the picture is different for industrial and storage with the following two scenarios:

*“In Scenario 1, 53% of Radlett SRFI contributes to South West Herts’ needs. This is considered a reasonable assumption on the basis of the evidence available to the study. **The result is a land requirement of 35.4 Ha over the 2021-41 period.***

*In Scenario 2, Radlett SRFI makes a smaller contribution (24% of site) to meeting South West Herts needs. This is considered to be a more cautious approach which does not fully reflect drivers of demand for such sites and premises in South West Herts. The additional land requirement for industrial uses is estimated at **59.5 ha to 2041, and a further 58.9 ha between 2041 and 2050.**”*

15.5 It concludes that:

“For industrial, storage and distribution uses, Scenario 1 indicates that South West Herts has no shortfall of land, with the additional land requirement of 35.4 Ha lower than the available supply of 50.4 Ha identified in the study.

In Scenario 2, the need for 59.5 Ha of land for industrial and storage & distribution development by 2041 overall implies that South West Herts has a shortfall of allocated land which is of sufficient quality to meet the level of need identified in this report. Over the period to 2041, the shortfall is around 9 Ha.”

15.6 The key element of this land supply is at East Hemel Hempstead (Central) with a site of **52.7 hectares** which makes up a very sizeable proportion of the overall supply in the sub region for the next 15+ years. The Study highlights the challenge and potential of this concentration of employment to not meet the NPPF’s requirements for positive plan-making which encourages economic growth. RPC shares this concern that all the employment opportunities for the next 15 years are very much concentrated. In terms of the East Hemel (Central) site this issue makes the transportation issues even more severe

and pressing in terms of the need to deliver the necessary infrastructure for sustainable travel as well as road infrastructure for commuters.

Strategic Policy SP5 – Employment and the Local Economy

- 15.7 The Policy states that these employment locations will provide "*an agreed oversupply for St Albans District's own needs, the excess will assist Dacorum Borough and potentially other South West Herts local authorities in meeting some of their employment requirements*". There is no logic to the Draft Local Plan including more employment land than is required when SACDC has stated that it cannot meet its own housing needs without releasing Green Belt. Surely any 'surplus' employment land should instead be used for housing - particularly where it is previously developed land. It is also worth noting that whilst the Council's intention is to support other authorities with an overprovision of employment land, there is no indication of any agreement with neighbouring authorities on this regard. A Statement of Common Ground (absent) should explain whether other authorities agree that they cannot meet their own need within their boundaries and agreeing for SACDC to provide land to compensate for this. As we explained in these representations, SACDC has failed to discharge their duty to cooperate and therefore we cannot agree that this approach for excess employment land is acceptable.
- 15.8 The Draft Local Plan does not actually state what its objectively assessed employment needs are nor does it state the amount it considers to be 'surplus' to requirements.
- 15.9 Strategic Policy SP5 (and the supporting text) fails to explain or include the number of jobs being planned in the District.
- 15.10 The proposed strategy to deliver all of the new employment in two strategic locations seems short-sighted compared to distributing employment across the District which will create more sustainable working patterns, enable more of the District's residents to work locally due to having a greater balance between housing and jobs across the District's settlements.

16 Transport

- 16.1 The Transport evidence and policies do not provide a clear overall multimodal transport strategy for the Plan Area, the individual settlements and HGC. Furthermore, there is no clear strategy for cross boundary transportation infrastructure.
- 16.2 As we have pointed out in our representations in response to the Infrastructure Delivery Plan (IDP) and Infrastructure Delivery Schedule (IDS) the Draft Local Plan is not backed by sound transport evidence and we provide detailed comment on HGC in relation to the IDP/IDS in response to the HDC Policies.
- 16.3 SACDC has published a Transport Impact Assessment (TIA) which appears to be the SACDC's key evidence base document to justify the Local Plan and its growth. The TIA appears to use two pieces of transport evidence as the foundation to the Local Plan's 'transport strategy'. These are:
- COMET Model; and
 - St Albans Modal Shift Study
- 16.4 The COMET Model develops 4 options with the 3 key options set out below in Page 14 of the Study.

2041 Option 1 Assumptions

The 2041 Option 1 assumptions chapter provides details of the assumptions used to develop the Option 1 scenario, which builds on Option 0 and includes the SADC Local Plan allocations. The chapter covers the following aspects:

Planning data for St Albans, including the list of the Local Plan allocations, the number of dwellings and jobs, the allocation of the sites to model zones, and the location of the sites;
Transport infrastructure, which remains broadly the same as Option 0 except for the new connections from the development sites to the highway network;
Zone connectors, which represent the access points for the largest Local Plan sites;
Trip generation adjustment, which uplifts the highway trip generation for the key Local Plan sites based on generic or site-specific trip rates provided by HCC.

2041 Option 2 Assumptions

The 2041 Option 2 assumptions chapter provides details of the assumptions used to develop the Option 2 scenario, which builds on Option 1 by including the transport infrastructure schemes set out in the SADC IDP and also including a 10% mode shift away from car across SADC. The chapter covers the following aspects:

Transport infrastructure schemes, which include a number of highway and public transport schemes based on the infrastructure proposals developed as part of the SADC IDP;
Traffic signal optimisation, which adjusts the signal timings at some key junctions where high increases in delay were forecast between Option 1 and 2;
Modal shift, which assumes a 10% shift away from car for all model zones within the SADC district, reflecting the impact of measures that cannot be directly modelled such as new walking and cycling infrastructure, improved travel information, bike hire schemes, car share schemes, promotional activities and travel planning.

2041 Option 3 Assumptions

The 2041 Option 3 assumptions chapter provides details of the assumptions used to develop the Option 3 scenario, which is an alternative to Option 2 which also reflects the IDP schemes but takes a more nuanced approach to mode shift with different levels applied in different areas of the district based on the type of people who live there and the type of journeys they make. The chapter covers the following aspects:

Alternative mode shift assumptions, which are derived from the WSP Opportunity to Shift Modes (OSM) tool, which estimates the potential for mode shift based on journey distance, the availability of alternative modes and the propensity of residents to walk, cycle or use public transport in St Albans.

16.5 A summary of the results of the impact on the District are set out below:

- **Option 0**, in SAD there is an increase in vehicles of between 13%-18% in the peak hours which results in an average speed reduction of around 10% in the peak hours.
- **Option 1**, the number of vehicles increases by a further 8% and average speeds reduce by 6%-7%.
- **Option 2**, compared to Option 1 across SAD there is a reduction of around 4% of vehicles and increases in speeds of between 5%-7% in the peak hours.
- **Option 3**, compared to Option 1, across SAD there is a reduction of around 4% of vehicles and increases in speeds of between 6%-7% in the peak hours

16.6 It then concludes that:

“Overall, in Option 2 and 3 the highway network operates satisfactory however there are parts of the highway network which experience increases in delays, on links and junctions, of over 2 minutes in Option 2 and 3 compared to Option 1. However, it is envisaged that these impacts could be mitigated against subject to further investigation”.

16.7 How is SACDC further investigating these impacts and their mitigation? It appears that there is a missing piece of evidence that delves much deeper into the impacts and their potential solutions.

16.8 The Report concludes that:

“There are critical pieces of infrastructure that are needed to support key developments, such as the A414/ Green Lane junction improvement close to the East Hemel site. These are needed to improve congestion and delays and to prevent traffic diverting to less suitable roads in the area. It is also necessary to close some minor roads to through traffic in the East Hemel and north of St Albans area to prevent unsuitable volumes of traffic using narrow minor roads such as Punchbowl Lane, Hogg End Lane, Sandridgebury Lane and Valley Road.

“There are increases in traffic flow on the Strategic Road Network as a result of the Local Plan proposals. The key percentage increases which occur are on slip roads to access the SRN whereas percentages increases on the main carriage way remain within +/- 10%. There are increases in delay at some access points onto the SRN further investigation could be considered alongside potential mitigation measures to look to reduce delays.”

16.9 These ‘critical pieces of infrastructure’ that are needed at the East Hemel site include the junction improvement to the A414/Green Lane junction however this is by no means an exhaustive list of all the improvements that will be required at Hemel. There needs to be a much more definitive list of the required mitigation measures that are being proposed, their costs, timing, trigger points etc.

16.10 Appendix D of the Report is the ‘Opportunity to Shift Modes Report’. Whilst RPC appreciates that modal shift away from the car to walking cycling and public transport is certainly the aim and should be prioritized, there is a need for some realism to be brought into the picture about existing and future populations and their likelihood to switch their travel modes. The key element to this is the type of sustainable infrastructure that is being proposed as part of the Local Plan Strategy. Just because a site is within a certain distance

to public transport or services, it does not mean that the route is safe or comfortable enough for it to be used.

16.11 The main requirements of cycling infrastructure are issued by the Dutch institute of traffic design (CROW), which is the basis for the UK Guidance Cycle Infrastructure Design (LTN 1/20).

Safe: The safety of the trail for traffic is crucial. This involves evaluating how different types of transport users are mixed on the trail and assessing the safety of intersections. The minimum requirement for a safe intersection includes the presence of a median, allowing people to cross a busy road in phases. A grade-separated intersection is a safer and more appealing option, though it comes with a higher cost.

Comfortable: The route must provide comfort for all users. Factors such as potential stops at intersections, the quality of the surface, obstacles along the way, and noise levels are considered to ensure a pleasant experience.

Attractive: The attractiveness of the route plays a key role in its usability. This includes evaluating whether the route runs parallel to major roads or passes through greener, more scenic environments.

Direct: The route should offer a direct connection between points, minimizing both travel distance and travel time. This can be achieved, for example, by avoiding busy intersections. The deviation factor is considered here, which is the ratio of the actual cycling route distance compared to the straight-line distance.

Coherent: The cycling network should be logical and provide good connectivity to various destinations. It is important that the network integrates well with other routes, ensuring a seamless connection for cyclists travelling through different areas.

16.12 As overarching strategy, we suggest that solutions for HGC, Redbourn and the District should focus on delivering on these requirements for the new and existing development of the area.

16.13 It is concerning that the Local Plan appears to be reliant on a minimum of a 10% modal shift with no fallback position should people's behaviour not realise this assumption and / or the sustainable infrastructure is not delivered.

16.14 The Local Plan appears to be heavily reliant on the HGC Transport & Vision Strategy for the growth at Hemel. It states the following in the TIA:

HGC Transport & Vision Strategy

The Hemel Garden Communities (HGC) Transport Vision and Strategy (TV&S)⁴ sets out HGC's approach for the long-term growth and transformation of Hemel Hempstead, to ensure the existing town can be developed as a successful, integrated, well-connected place with a sustainable movement network. The vision recognises that whilst the transport network will need to continue to cater for vehicle trips there is a need and opportunity to improve passenger transport and walking and cycling routes to give people a real choice in how they travel, particularly for shorter trips. It sets out how the increased demands for movement of people and goods generated by the predicted growth cannot be accommodated if existing transport movement patterns and behaviour continue and outlines the case for change. The TV&S identifies a key and local network.

The HGC TV&S was endorsed by the Hertfordshire County Council Highways & Transport Panel Cabinet in May 2024 and was adopted at HCC Cabinet in June 2024.

Further transport work, including a transport implementation plan, will be undertaken before, during and after Local Plan Examination.

- 16.15 Again, it is concerning that it states that *“further transport work, including a transport implementation plan, will be undertaken before, during and after Local Plan Examination”*
- 16.16 The HGC Transport & Vision Strategy includes an HGC Programme Area Map which has a very extensive 'Area of Influence' which is not surprising given the impact the new growth that Hemel will have on the sub region (and likely wider). **Given that the Strategy still requires a lot of transport work we question how the St Albans Local Plan can really progress without this further evidence given that it will clearly have influence over a considerable proportion of the District?**

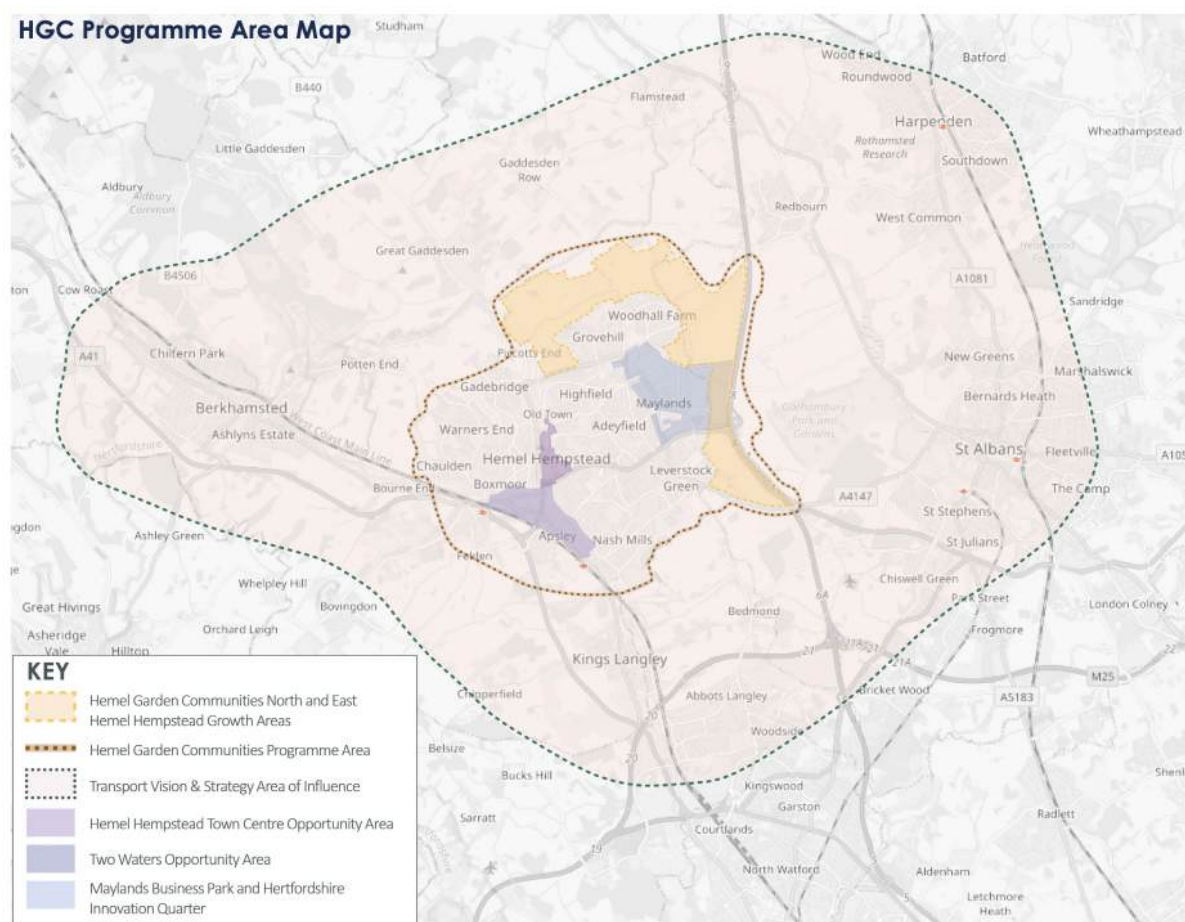


Figure 1 Hemel Garden Communities Programme Area and TV&S Wider Influence Area

Figure 16.1: HGC Programme Area Map

16.17 Clearly, the ‘Major Transport Schemes’ set out in Policy TRA2 are subject to any future transport modelling so the list of major schemes could very well change and increase in terms of requirements.

16.18 As we have set out in the IDP section, the transport projects in the IDP are lacking any substantive detail including project details, timing / phasing and do not have cost estimates and do not have secured funding.

16.19 Chapter 8 (Transport) is virtually silent on any improvements to local bus services. As we set out in our representations, Redbourn does not have a railway station so is completely reliant on local bus services for its public transportation and the existing service is not adequate – planning nearly 700 additional dwellings in Redbourn, without proper investment in the bus service, will leave no viable choice other than driving a car.

16.20 Policy TRA2 states that the Council will support the delivery of Improvements to Walking and Cycle Infrastructure as identified in the LCWIP. The LCWIP is limited to St Albans City and Harpenden with a future version covering the other settlements including Redbourn.

17 Policy NEB8 (Managing Flood Risk)

- 17.1 The NPPF explains that *“inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere”*¹³. Inappropriate development includes housing and the NPPF is clear that housing development should be directed away from areas at highest risk.
- 17.2 The NPPF explains¹⁴ that *“All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:*
- a) applying the sequential test and then, if necessary, the exception test as set out below;*
 - b) safeguarding land from development that is required, or likely to be required, for current or future flood management;*
 - c) using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management); and*
 - d) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations*
- 17.3 Policy NEB8 states that *“Proposals located within flood zones (i.e. Flood Zones 2 or 3, or sites within Flood Zone 1 where there is an identified flood risk) need to meet the requirements of the sequential and exception tests, in accordance with national policy.”* However, this has not been undertaken in the Council’s selection of housing allocations.
- 17.4 Simply put, given that the site East of Redbourn has significant land within the highest risk of flooding, why did SACDC select the site without first undertaking a Sequential Test?

¹³ NPPF paragraph 165

¹⁴ NPPF paragraph 167

Diagram 2: Application of the Sequential Test for Local Plan preparation

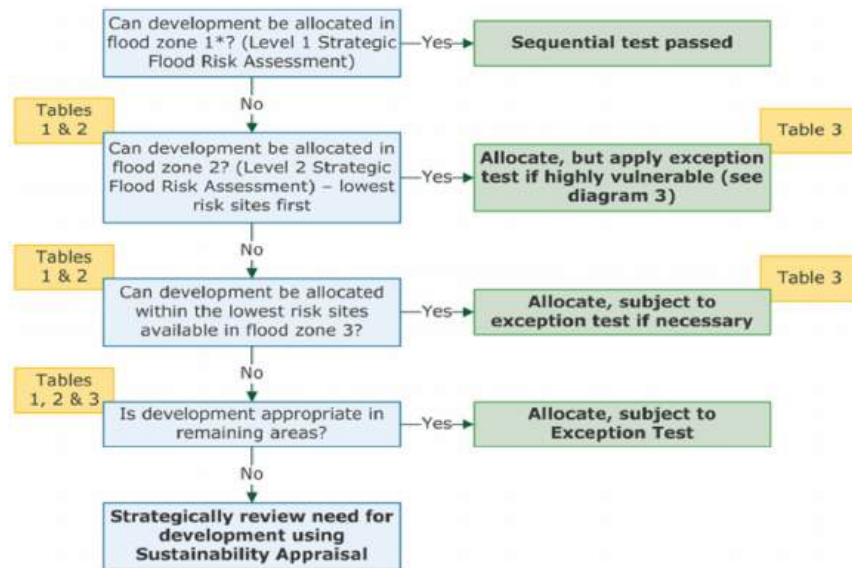


Figure 17.1: PPG Application of the Sequential Test for Local Plan preparation

18 Policy LG5 (Green Belt)

- 18.1 The Green Belt is an active contributor of ecosystem services in the region, therefore the wording of the policy text, a) ii) should not "promote" healthy ecosystem services, but should "provide and promote" healthy ecosystem services.
- 18.2 We question part b) of this policy. It seems to be attempting to open the door for 'New state schools' in the Green Belt and we do not see where this is supported in the NPPF. It also includes "The creation of new transport infrastructure" in the Green Belt yet the wording in the NPPF is in relation to "local transport infrastructure which can demonstrate a requirement for a Green Belt location" and is only 'not inappropriate' in the Green Belt provided that it preserves its openness and does not conflict with the purposes of including land within it.
- 18.3 **Policy LG5 is not consistent with national planning policy for the reasons explained above, therefore it an unsound policy.**

19 Landscape

West of Redbourn (Broad Location B3) Landscape and Visual Assessment

- 19.1 RPC is concerned that the allocation policy (Broad Location West of Redbourn B3) is not sufficiently informed by the Landscape and Visual Assessment Sheet (September 2024) and does not set out adequate key development requirements that would address some of the landscape and visual impact concerns. Some issues raised below:
- 19.2 The Landscape and Visual Assessment Sheet requires “the 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” but no key development requirement includes this specific landscape specification and the required masterplan does not refer to the landscape evidence, only requiring setbacks from the Conservation Area.
- 19.3 The sheet also requires to “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.” Unfortunately, this hasn’t also translated into a design requirement in the allocation policy.
- 19.4 No reference is made in the allocation policy to the specific landscape and visual impact mitigation proposed in the sheet: *“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.”*
- 19.5 No reference is made to the opportunities to connect Green Infrastructure raised in the sheet: *“Consider opportunity for links with wider network of green infrastructure routes and assets such as Redbourn Common, Flamsteadbury Play Area, Tassell Hall Allotments to north. Opportunity to create green route through centre of site (north to south) connecting to Nickey Line in the south.”*
- 19.6 Given the disregard of the allocation policy to the landscape evidence, RPC considers that the Local Plan is not sufficiently and robustly based on evidence, in this case landscape assessments, as to be an efficient and positively prepared policy, therefore the allocation policy of West Redbourn being **unsound**.

North Hemel Hempstead Landscape Assessment (September 2024)

- 19.7 RPC is concerned with the landscape assessment provided in support of the North Hemel Hempstead allocation and particularly with the assessment section that covers the parcels of land within St Albans District.

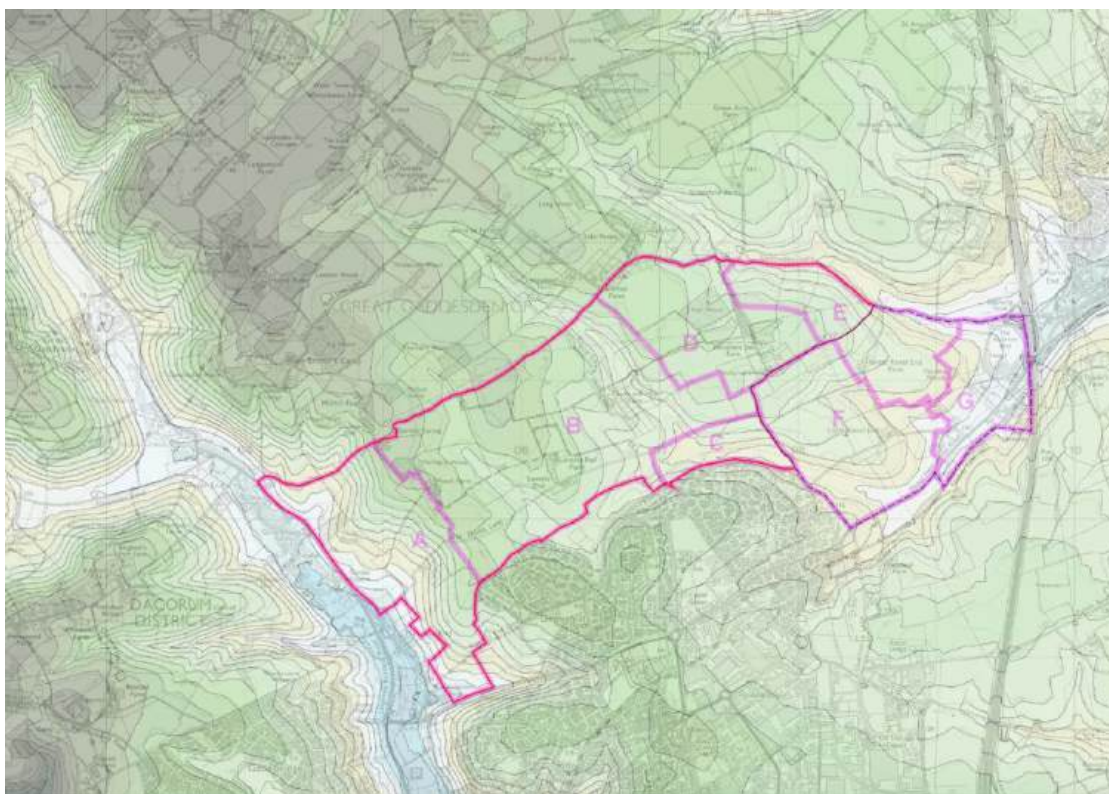


Figure 19.1: Topography shown on the North Hemel Hempstead Landscape Assessment (2024).

- 19.8 Parcels F and G (Upper Ver Valley) are located within the gap between Hemel Hempstead and Redbourn, providing an important physical and perceptual gap between the two settlements. RPC agrees with the Landscape Assessment in terms of their perceptual qualities, such as presence of human influence, traffic noise, disperse development, etc. that contribute to a low tranquillity value, but we are of the view that the Landscape Assessment has a simplified view of the sensitivity of parcels F and G.
- 19.9 Parcel G is given a moderate sensitivity from a landscape perspective, but the assessment does not give sufficient weight to the presence of the Aubreys Scheduled Monument within the area of study and it does not mention the close location of Redbourn Conservation Area, only over 200 metres distant from Parcel G. None of the views identified in the assessment explore the potential visual impact to and from the Redbourn Conservation Area, which includes Grade I, II* and II Listed Buildings. RPC is concerned that this could affect the sensitivity of Parcel F and that therefore, the landscape assessment should be reviewed. Views in the area are probable given the sloping topography of Parcel G and the existing public rights of way through the area and in the vicinity.
- 19.10 The North Hemel Hempstead Landscape Assessment (2024) does not follow a careful order in the assessment of landscape and visual impacts. It moves directly from identifying landscape sensitivities to design development considerations and recommendations. However, it does not explain the actual impacts caused by the proposed development proposal. How is that mitigation measures are being proposed in the absence of an evidence-based and robust assessment of impact before mitigation?

- 19.11 The report concludes with potential impacts or effects on landscape and views (in the absence of any mitigation), but these are identified only after a design approach, developable areas and mitigation measures have been incorporated into the design. We are concerned that this approach does not provide a clear picture of the impact of development in principle, as to understand its effects on landscape, and the recommend mitigation measures. If there is no identified harm first, how is that mitigation is being suggested?
- 19.12 It is important to raise that the assessment acknowledges that the gap between the settlements of Hemel Hempstead and Redbourn are important in landscape and Green Belt terms, however, it yet supports the development of most of Parcel F. The North Hemel Hempstead Landscape Assessment (2024) fails to consider the development's cumulative effects on the gap between the two settlements in light of the existing developments in Parcel G, existing infrastructure and the Draft Local Plan allocations at West of Redbourn for 545 dwellings (Site B3) and East Hemel Hempstead (North) for 1,600 dwellings (Site H2).
- 19.13 Furthermore, the proposed mitigation shown in the Potential Landscape Structure and Developable Extents relies significantly on landscaping screening to reduce the visual impact of the proposed development. This is proposed with new structure planting (bright green below) in the form of tree groups, woodland groups, parkland style tree planting in fields. This is not an adequate approach as it does not explore first the avoidance of harm, which is the necessary first step in addressing landscape impact. Then, the proposed mitigation of tree planting is not also temporary and not a long term or necessarily of all-seasons durability, but it is also contrary to local landscape character. Proposals for new screening include parkland style tree planting, but this is not a parkland, which is a formalised and designed landscape. This area of the district is a deeply rural and agricultural working environment, with strong links with the rural character of the landscape to the north (Chilterns National Landscape). The proposed mitigation has the potential impact of detracting from the established and contextual landscape character only due to the need for significant screening of a development that would, in other circumstances, not be acceptable as it leads to significant impacts in the landscape.

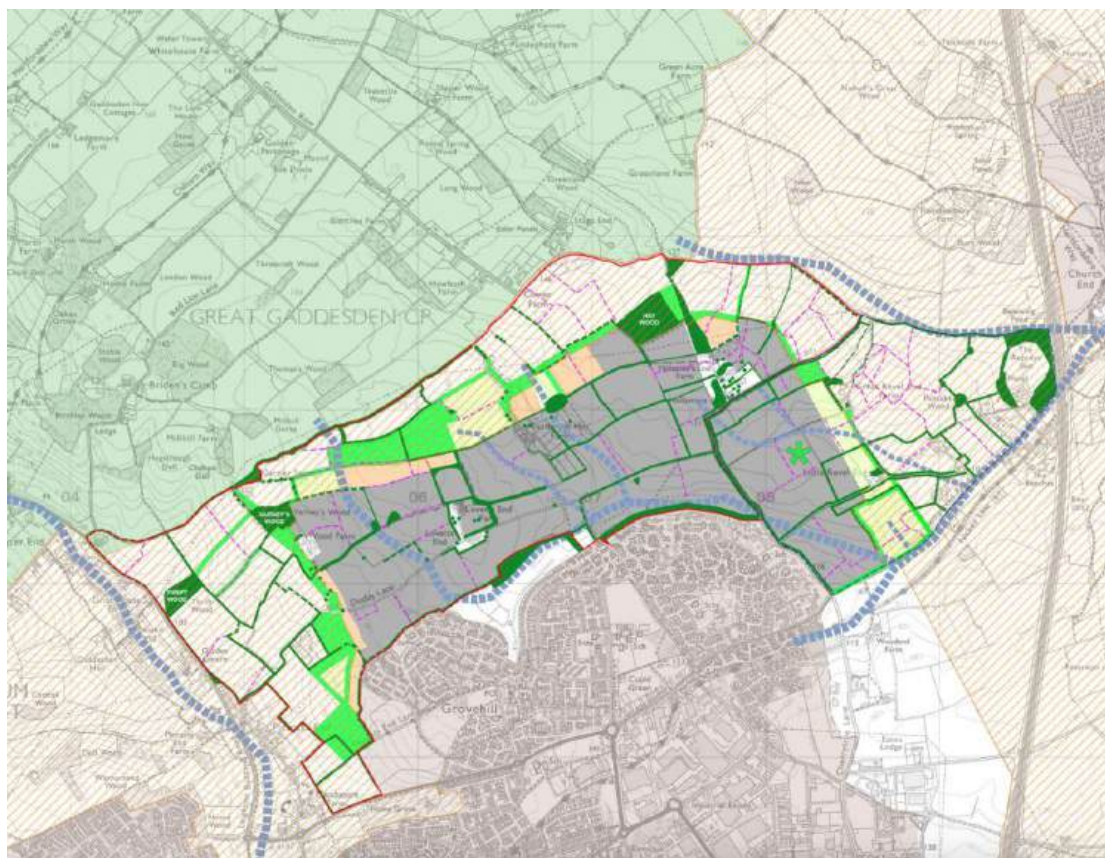


Figure 19.2: Potential Landscape Structure and Developable Extents.

19.14 Additionally, there is no pre-development scenario assessment of the areas of visual sensitivity and there is also a lack of identification key/locally important views, with prominence in the list of viewpoints assessed. Surely the views from any public right of way should not be assessed equally as the views from a gateway into the settlement, the top of a ridge or from a Schedule Monument or Listed Building. There is also no assessment of views out of the site considered for development.

19.15 It is also unclear if the proposed mitigation in the North Hemel Hempstead Landscape Assessment (2024) is incorporated into the allocation policy and concept plan. The plan (see below) does not offer a clear correlation of the mitigation shown on the Landscape Assessment. The mitigation proposed on the Broad Locations – Landscape + Visual Appraisal (September 2024), whilst consistent in some, is not completely coordinated with the mitigation proposed in the North Hemel Hempstead Landscape Assessment (2024). Why is this? The Council provides no justification for having several assessments that overlap each other and a number of mitigation measures, that do not always coincide from one document to another. For instance, the Landscape Assessment recommends the development to *“maintain the physical and visual separation between Hemel Hempstead and Redbourn by keeping development behind the local ridgeline associated with Great Revel End Farm and maintaining a sense of separation along Hemel Hempstead Road”*. Notwithstanding this, the landscape and visual appraisal sheets on the Broad Locations – Landscape + Visual Appraisal (September 2024) does not include this

recommendation and continue failing to consider the cumulative impact of the development with the West of Redbourn B3 allocation for 545 dwellings.

19.16 In conclusion, RPC considers that the North Hemel Hempstead Landscape Assessment (2024) is flawed and it is incomplete for the reasons already explained. In this case, we cannot support this document and the allocation of the proposed sites, which is **unsound** due to the flawed landscape assessment in which it is based on.

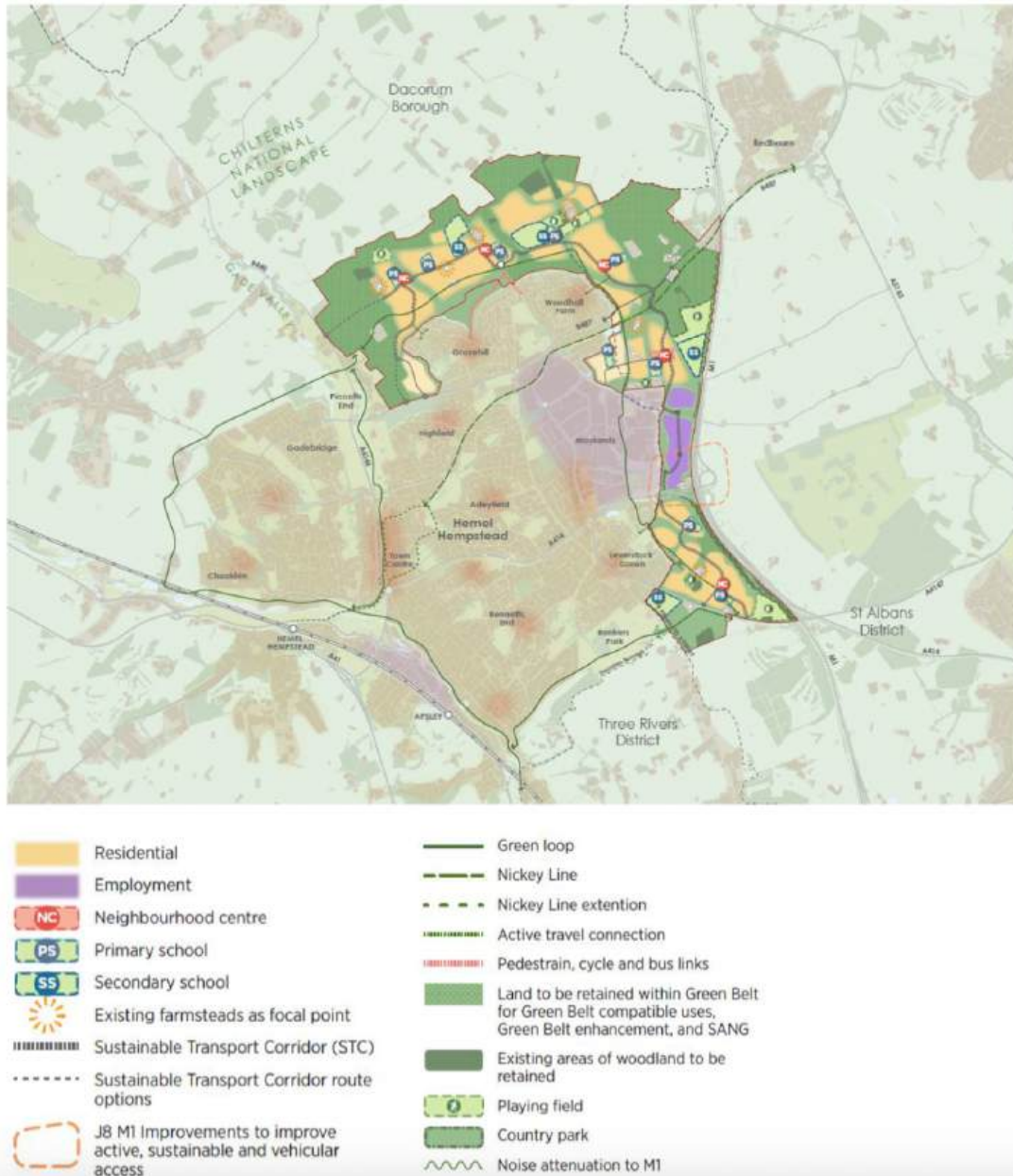


Figure 19.3: Indicative Concept Plan for the HGC Growth Areas (Draft Local Plan)

Policy NEB10 – Landscape and Design

19.17 RPC considers that the proposed policy NEB10 wording is not robust and clear enough as to secure the aspirations in terms of landscape and quality of design. We have summarised below a number of concerns with regards to policy NEB10:

- The policy makes a confusing reference to landscape and landscaping, where these are two different terms. The constant reference and focus on the

“landscaping” elements of development proposals weakens the policy aspirations for development to follow a Landscape Strategy, which is a wider concept that involves more (design) than just landscaping. Landscaping is not the only element that contributes towards sustainable and attractive places. Therefore, it would be preferred for the policy to refer to good quality design as an essential element to deliver attractive and sustainable places, instead.

- NEB10 adequately requires a Landscape Strategy to inform development, protecting landscape, integrating and enhancing it, thus design. Unfortunately, and without justification, policy NEB10 only requires protecting, enhancing and integrating landscape (including tree planting) to major development. Why is not all development proposal required to comply with this requirement? The Council provides no explanation, and it seems to contradict the SACDC Local Plan’s wider landscape aspirations.
- This policy also states that *“where changes to landscape may be required, details be provided of existing landscaping, trees and shrubs trees to be removed; the planting of new trees, shrubs and grass; alongside details of and level changes, enclosure, screening and paving; significant healthy trees and other important landscape features shall normally be retained.”* RPC considers that this policy is not correctly worded as it assumes that development proposals should result in changes to landscape. This could lead to developments that irrevocably alter landscape character, not protecting or enhancing it, as required in the same policy. Instead, the wording of the policy should refer to “development proposals” that should demonstrate the protection and enhancement of local landscape character. Some elements that contribute towards character could be listed, as the policy currently does, but this should not be an exhaustive list.
- Landscape and Visual Impact Assessments should be required not only to major development, but also to those development proposals that may be in sensitive locations, e.g.: the setting of the Chilterns National Landscape, adjacent to open access land/PROW, adjacent to Green Belt, etc.

19.18 RPC is concerned that the proposed wording of policy NEB10 is **not effective in protecting and enhancing landscape, neither is sufficiently justified and positively prepared, therefore policy NEB10 is unsound.**

Policy NEB11 – Chilterns National Landscape

19.19 Policy NEB11 is insufficient as currently worded as it only refers to demonstrating that development proposals would not have an impact on the statutory purpose of the Chilterns National Landscape. It should specifically state that no harm or negative impact should be caused to the National Landscape, including its statutory purpose and its special qualities. As worded, “not have an impact” is an unclear sentence, as the Local

Plan should require proposals to avoid harm, but not impacts in general, which could also be neutral or positive, which would normally be welcomed.

19.20 Importantly, Policy NEB11 has missed in the policy wording the reference to the setting of the Chilterns National Landscape. The NPPF (paragraph 182) states:

“Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.”

19.21 Therefore, it would be expected for Policy NEB11 to develop, at local level, the NPPF expectation for the adequate protection of the setting of a National Landscape. In the absence of this, we consider that Policy NEB11 is insufficient, as currently worded, and fails to comply with national planning policy, also not being effective in protecting the National Landscape. This policy is **unsound**.

20 Heritage

20.1 Whilst RPC is pleased to see that SACDC has undertaken Heritage Impact Assessments (HIAs) for many of the proposed allocations, it is unclear as to how these Assessments have influenced the Local Plan proposals or its policies. It states in its covering report (paragraph 2.5) that:

“The recommendations of the site-specific HIAs have informed the site allocations in Part B of the Local Plan, including the indicative capacities and the Key development requirements”.

20.2 Whilst it states that the HIAs informed the site allocations in Part B of the Local Plan including indicative capacities and key development requirements there is no proof of this provided by SACDC.

20.3 In terms of the HIA’s informing the allocations and their capacity how have they resulted in any changes to the site capacities and assumed densities for example?

20.4 When one reviews Part B of the Local Plan it simply states the same text repeatedly whenever there is a locally listed building. For example:

H1 North Hemel Hempstead (Requirement 16):

“Through Masterplanning the layout and design of development should minimise any harm to the setting and significance of the Grade II Listed Holtsmere Manor, the Grade II Listed Great Revel End Farmhouse, the Grade II Listed Barn at Great Revel End Farmhouse and the Grade II Listed Wood End Cottages; this may include the incorporation of appropriate set backs of development and creation of open spaces.”

H3 East Hemel Hempstead (Requirement 20):

“Through Masterplanning, the layout and design of development should minimise any harm to the setting and significance of Grade II Listed Breakspear, Grade II Gorhambury Registered Park and Garden and Grade II Listed Gorhambury mansion; this may include the incorporation of appropriate set backs of development and creation of open spaces.”*

B3 West Redbourn (Requirement 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.”

20.5 Ultimately it will be for Historic England to respond as to whether the evidence and the planning process is in line with their guidance on how authorities should approach

heritage in the Local Plan and the selection of potential sites including the potential impacts on heritage that might result from the proposals.

20.6 It is still unclear as to how the proposed allocations and their alternatives were assessed using HIAs given that the HIAs were not prepared until after the Regulation 18 Plan was prepared. For example the growth at HGA – how was this informed by the HIAs?

21 Agricultural Land

21.1 The NPPF (paragraph 180) states (our emphasis):

“Planning policies and decisions should contribute to and enhance the natural and local environment by:

b) recognising the intrinsic character and beauty of the countryside, the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland”

21.2 A Green Future: Our 25 Year Plan to Improve the Environment¹⁵ sets out the government’s 25-year plan to improve the health of the environment by using natural resources more sustainably and efficiently. It plans to:

- protect the best agricultural land
- put a value on soils as part of our natural capital
- manage soils in a sustainable way by 2030
- restore and protect peatland

21.3 Paragraphs 001 and 002: Planning Practice Guidance for the Natural Environment explain why planning decisions should take account of the value of soils and agricultural land classification (ALC) to enable informed choices on the future use of agricultural land within the planning system.

21.4 The PPG states the following about assessing agricultural land to enable informed choices about its future:

“How can planning take account of the quality of agricultural land?”

The Agricultural Land Classification assesses the quality of farmland to enable informed choices to be made about its future use within the planning system.

There are five grades of agricultural land, with Grade 3 subdivided into 3a and 3b. The best and most versatile land is defined as Grades 1, 2 and 3a. Planning policies and decisions should take account of the economic and other benefits of the best and most versatile agricultural land.

In the circumstances set out in Schedule 4 paragraph (y) of the Development Management Procedure Order 2015, Natural England is a statutory consultee: a local planning authority must consult Natural England before granting planning permission for large-scale non-agricultural development on best and most versatile land that is not in accord with the development plan. Natural England has published guidance on development on agricultural land.”

¹⁵ <https://www.gov.uk/government/publications/25-year-environment-plan>

21.5 The areas to west, south, east and northeast of Redbourn and east of Hemel Hempstead appear to be comprised of Best and Most Versatile Agricultural Land (high likelihood) as evidenced by the map below. Which means that if developed the borough would lose some of its best agricultural land and this would be lost to future generations at a time when climate change is having immediate impacts.

21.6 One of the SA Framework Objectives under 'Soils and other resources' is to "*Minimise development on best and most versatile agricultural land and minimise the degradation/loss of soils, particularly soils known to be of higher quality.*" It also states (Page 82):

*"A clear priority is avoiding the loss of productive **agricultural land**, particularly that which is defined as 'best and most versatile', which is defined as that which is of grade 1, grade 2 or grade 3a quality. However, data availability is a barrier, as the nationally available dataset is very low resolution (and does not differentiate between grades 3a and 3b) whilst the available dataset showing agricultural land quality with a high degree of accuracy (following fieldwork) is very patchy. In this light, site promoters are encouraged to submit evidence on land quality."*

21.7 The Draft Local Plan Policy NEB9 states:

"Other than where development is allocated in this Plan, where major development on agricultural land is proposed, a detailed survey (approved by the Department for Environment, Food and Rural Affairs (DEFRA) or an independent expert), which includes an assessment of grading, should be submitted. Development resulting in the loss of the best and most versatile agricultural land (grades 1, 2 or 3a) will normally be refused. An exception may be made where it can be evidenced that there is an overriding need for the development and there is no alternative land of a lower quality which could reasonably be used."

21.8 We question the justification for this policy which effectively says that SACDC does not require a detailed survey for the development proposed for allocation in the Draft Local Plan but does require surveys for development not in the Local Plan. As the SA states SACDC does not have detailed survey for all of the proposed sites. Either SACDC or the site promoters of proposed allocations should provide this information as soon as possible. In any case, the Defra mapping of Predictive BMV is quite detailed and should inform decisions regarding the locations of proposed growth. Both of the proposed allocations at Redbourn would be removed as would large sections of the Hemel Hempstead related growth.

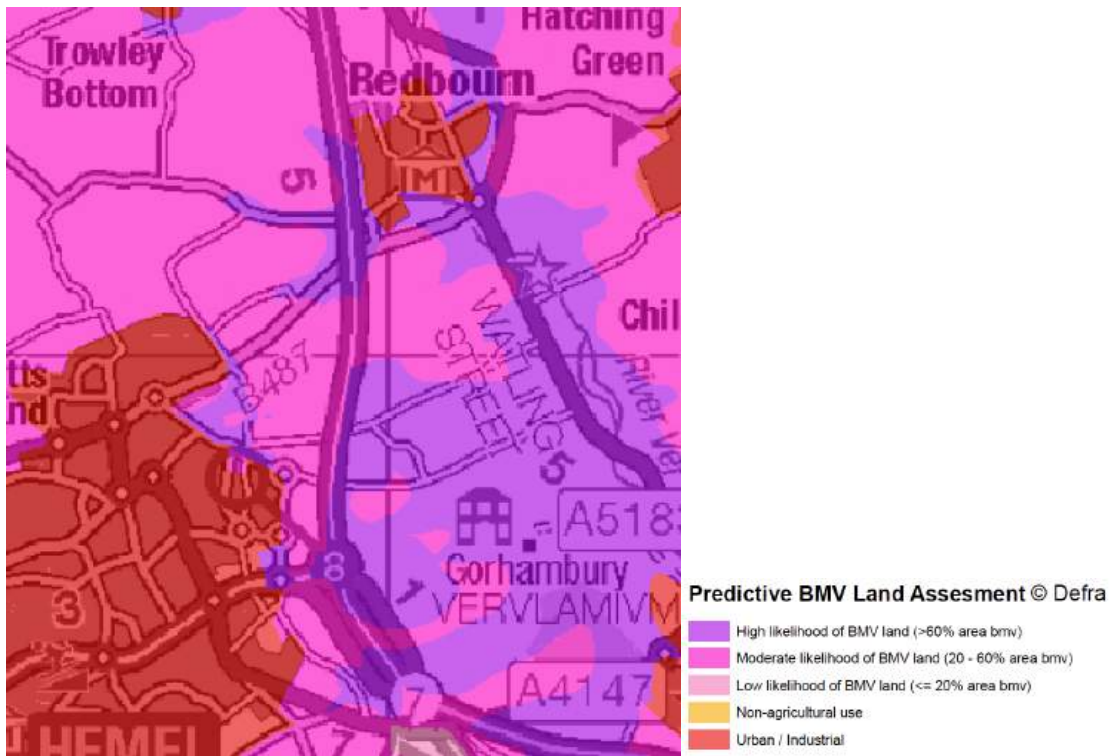


Figure 21.1: Predictive Best and Most Versatile Land Assessment) Defra

Appendix A – Proposed Housing by Settlement

Based on Draft Local plan Table 3.1 (Broad Locations) and Part B - Local Plan Sites.

	Broad Locations	Large Sites (100-249 dwellings)	Medium & Small Sites	Green Belt - PDL	Sites within Urban Settlements (HELAA)	Sites Within Settlements (Urban Capacity Study)	Total
Hemel Hempstead							
North Hemel Hempstead	1,500*						
East Hemel Hempstead (North)	1,600**						
East Hemel Hempstead (South)	2,400***						
East Hemel Hempstead (Central) 55 ha employment							
P3 (15)				15			
Total	5,500^	0	0	15	0	0	5,515^
St Albans							
North St Albans	1,097						
East St Albans	472						
Glinwell St Albans	484						
L1 (180)		180					
M3 (70), M8 (65), M18 (37)			172				
UC1 (92), UC2 (57), UC3 (36), UC4 (16), UC5 (33), UC6 (29),						587	

UC7 (27), UC9 (10), UC10 (24), UC11 (6), UC12 (20), UC16 (16 homes), UC18 (13), UC19 (43), UC21 (11), UC22 (9), UC23 (9), UC24 (8), UC26 (9), UC28 (10), UC30 (5), UC31 (9), UC32 (5), UC34 (7), UC35 (11), UC40 (6), UC41 (6), UC42 (6), UC43 (5), UC45 (5), UC48 (5), UC49 (5), UC51 (5), UC55 (17), UC56 (6), UC57 (6)							
Total	2,053	180	172	0	0	587	2,992
Harpenden							
North East Harpenden	738						
North West Harpenden	293						
M7 (65), M16 (39), M17 (38), M19 (29), M20 (25), M22 (15), M25 (8)			219				
UC8 (24), UC14 (17), UC15 (32), UC29 (8), UC44 (5), UC46 (6), UC47 (5), UC50 (5), UC52 (5), UC54 (95)						202	
Total	1,031	0	219	0	0	202	1,452
Redbourn							
West of Redbourn	545						
M6 (68)			68				
UC33 (5)						5	

Total	545	0	68	0	0	5	618
London Colney							
West of London Colney	324						
U2 (28)					28		
UC17 (5 homes), UC20 (21 homes), UC27 (8 homes), UC58 (5)						39	
Total	324	0	0	0	28	39	391
Radlett							
Harper Lane nr Radlett	274						
Total	274	0	0	0	0	0	274
Wheathampstead							
M2 (85), M9 (60)			145				
Total	0	0	145	0	0	0	145
Bricket Wood							
M4 (74 homes), M15 (44 homes), M23 (9 homes)			127				
U3 (10 homes)					10		
Total	0	0	127	0	10	0	137
Chiswell Green							
L3 (101)		101					
M1 (98)			98				
U4 (5)					5		
UC25 (10)						10	

Total	0	101	98	0	5	10	214
Park Street							
L2 (104)	0	104					
UC36 (5), UC53 (11)						16	
Total	0	104	0	0	0	16	120
How Wood							
M10 (51)			51				
Total	0	0	51	0	0	0	51
Gustard Wood							
M12 (49)			49				
Total	0	0	49	0	0	0	49
Colney Heath							
M13 (49)			49				
Total	0	0	49	0	0	0	49
Hatching Green							
M21 (25)			25				
Total	0	0	25	0	0	0	25
Smallford Works, Near Sleapshyde							
P1 (58)				80			
Total	0	0	0	80	0	0	80

Between London Colney and St Albans							
P2 (64)				64			
Total	0	0	0	64	0	0	64
TOTAL: Broad Locations and Allocations							12,176^

Appendix B – ‘*Start to Finish – How quickly do large-scale housing sites deliver*’ 3rd Edition, September 2024 (Lichfields)