

# Land South of Harpenden Lane

## Redbourn



**Planning Statement**

**December 2025**

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## **Appendixes**

Appendix 1: Site Location Plan

Appendix 2: Land use Parameter Plan

Appendix 3 Illustrative Masterplan

## 1. SECTION 1 – SITE INTRODUCTION

1.1. Marrons is instructed by Martin Grant Homes and Kearns Land (“the applicants”) to prepare this Planning Statement (“this Statement”). This Statement accompanies an Outline planning application with all matters reserved apart from access, submitted to St Albans City and District Council (“the Council”) for determination. It relates to the development of Land to the South of Harpenden Lane Redbourn (“the Site”), as shown on the accompanying Site Location Plan (Drawing Ref - edp2974\_d010b, **Appendix 1**).

1.2. The application is submitted for the following proposed development:

*“Outline planning application with all matters reserved except for access for the erection of up to 35 residential dwellings including affordable housing with provision of vehicular access from Crown Street and pedestrian and cycle accesses, alongside public open spaces, including Suitable Alternative Natural Greenspaces, sustainable urban drainage systems, landscaping, infrastructure and earthworks”*

1.3. Access is submitted for detailed consideration. The access point of for this application is proposed off Crown Street, as shown on the accompanying Access Plan (Drawing Ref – 70110083-SK-006 - P01).

1.4. This Statement should be read alongside all other documents submitted in support of the application which, collectively, show that the proposed development is acceptable in planning terms. Having regard to the development plan and all relevant material considerations, this Statement demonstrates that there are no reasons as to why planning permission should be delayed or refused.

1.5. Accordingly, there are no adverse impacts of the proposals that would significantly or demonstrably outweigh the benefits and, as such, planning permission should be granted

### **Application Content**

1.6. A comprehensive suite of technical reports, and drawings accompany this Statement. These have been prepared by specialist consultants to inform and support the application for outline planning permission. The submission includes the following

Report	Consultant
Air Quality Impact assessment	WSP
Arboricultural Impact Assessment	EDP
Biodiversity Net Gain Assessment ( Including Habitat Condition Assessment)	EDP
Climate Statement	Stuart Michael Associates
Design and Access Statement	EDP
Ecology Impact Assessment	EDP
Flood Risk and Drainage Strategy including (Hydraulic Modelling Report)	WSP
Foul Sewage Capacity Report	WSP
Heritage Statement	EDP
Landscape and Visual Impact Assessment	EDP
Phase 1 and 2 Contamination assessment	ST Consult
Nosie Assessment	WSP
Land Remediation Strategy	ST Consult
Shadow HRA Assessment	EDP
Transport Statement	WSP
Utilities Survey	ULCM

Table 1 – Planning Application Reports

1.7. As the application is submitted in outline with all matters reserved except for access, detailed approval is not sought at this stage for layout, scale, appearance or landscaping. However, to ensure that sufficient information is available to fully assess the likely effects of the proposed development and to establish the key principles that will guide the detailed design at reserved matters stage, the application is supported by a land use Parameter Plan (edp2974\_d054d, **Appendix 2**). This plan identifies the following fixed elements:

- Developable Area

- Amenity Greenspace
- Suitable Alternative Natural Greenspace provision
- Attenuation / Surface Water Storage Areas
- Vehicular access from Crown Street
- Pedestrian access, including from Crown Street, Harpenden Lane and Waterend Lane

1.8. For the purpose of clarity, the following drawings are submitted for approval

Plans/ Drawings	Drawing Number
Site Location Plan	edp2974_d010e
Land Use Parameter Plan	edp2974_d054g
Detailed Access Drawing	70110083-SK-006 - P01

*Table 2 - Drawings submitted for approval*

1.9. To demonstrate the development proposals for up to 35 homes, can be suitably accommodated within the parameters applied for, an Illustrative Masterplan (Drawing No. edp2974\_d053k, **Appendix 3**) has also been submitted. This demonstrates one way in which development on the Site could come forward.

**Planning Statement Scope**

- 1.10. **Section 2**- Provides a description of the site context and surrounding area, including its connectivity and any relevant planning history.
- 1.11. **Section 3** - Details the proposed development, including a summary of consultation undertaken and any pre application advice received.
- 1.12. **Section 4** - Identifies the relevant adopted or emerging national, and local planning policy framework, and other key material considerations.
- 1.13. **Section 5** Provides a planning assessment of matters relating to the proposed development in line with identified national and local policy guidance. Including setting out a draft S106 heads of terms.
- 1.14. **Section 6** – Set out the assessment of the planning balance.
- 1.15. **Section 7** – Provides a conclusion on the Planning Statement.

## 2. SECTION 2 – SITE CONTEXT, SURROUNDINGS AND PLANNING HISTORY

### **Site Context**

- 2.1. The site, as identified on the submitted Location Plan (**Appendix 1**), is a single irregular shaped parcel of land extending to approximately 3.8 hectares situated to the south of Harpenden Lane, on the eastern edge of Redbourn.
- 2.2. Redbourn is identified by the Council as being a relatively self-contained settlement with a good range of local services, community facilities, and employment opportunities, including those within the nearby Redbourn Industrial Park.
- 2.3. The Site comprises predominantly of grassland, enclosed by established hedgerows and mature trees. Vegetation across the site mainly consists of overgrowth with native hedgerow species such as hawthorn, blackthorn, and field maple, providing strong field enclosure and substantial tree cover.
- 2.4. The northern section of the site was previously accommodated a residential property, a nursery (including glasshouses), and several outbuildings. These structures have since been demolished.
- 2.5. A section of the River Ver flows through the site, within a shallow valley bordered by wet grassland and riparian vegetation. Given the presence of the River Ver the parts of the site closest to it are identified as being within Flood Zone 2 and 3.
- 2.6. From a topography standpoint, the land is mostly level with the eastern and western parts of the Site fall gently towards the River Ver with ground levels also gradually falling from north to south along the river corridor, ranging from approximately 96.6 metres Above Ordnance Datum (“AOD”) in the north-eastern corner to around 93.5 metres AOD in the south-western part of the site.
- 2.7. Associated with the topography, areas of surface water have been identified across the site including existing flow paths.
- 2.8. An existing public right of way (footpath 018) is located adjacent to the western boundary of the site connecting north to south from Harpenden Lane to Crown Street.

- 2.9. The Site contains no Listed Buildings, Scheduled Monuments, Registered Parks and Gardens, or Battlefields. The Redbourn Conservation Area adjoins the south-western edge of the site. The nearest Listed Buildings are clustered along the High Street, approximately 200m to the south and west.
- 2.10. The Site lies within the Metropolitan Green Belt, which extends around London and covers the majority of undeveloped land outside existing settlements in St Albans District.

### **Site Surroundings and Connectivity**

- 2.11. In its immediate context, the site is tightly contained by established physical features. To the north, the Site is bound by Harpenden Lane and agricultural field parcels that continue northwards towards Redbourn Golf Club. To the east, the site is enclosed by the A5183 and the Nickey Line, a disused railway that formerly linked Hemel Hempstead and Harpenden which now forms part of a valued local walking and cycling route.
- 2.12. To the south, the boundary adjoins Waterend Lane, which comprises a small cluster of predominantly detached dwellings including properties within the Redbourn Conservation Area. To the west, the site adjoins Ver Road and Crown Street from which vehicular access will be taken.
- 2.13. The nearest bus stops are located approximately 400 metres from the site along Harpenden Lane to the north providing convenient access to regular local services. These routes offer connections to St Albans, Harpenden, and Hemel Hempstead, as well as school bus services serving the wider area. This ensures that Redbourn is well connected by public transport and travel options and allows for public transport access further afield.
- 2.14. On a wider scale, the site is located approximately 5 kilometres north east of Hemel Hempstead, 4 kilometres south west of Harpenden, and around 14 kilometres from Watford, meaning that convenient reach of a range of local services and employment opportunities including providing access to the outer boroughs and central London.
- 2.15. The site benefits from strong transport links to the regional and national network. By road it lies near the M1 motorway (via nearby junctions serving Redbourn/Harpenden) which provides direct north-south access between London and the Midlands. To the east the M25 motorway is readily accessible via the Redbourn Road / A1081 corridor and London Colney, offering connectivity around London and links further East and West.

2.16. Rail connectivity is provided via the nearby Harpenden station and Hemel station on the Thameslink route, which offers frequent services into central London and onward connections to London Luton Airport. In addition, the airport itself is only around 12 kilometres from Redbourn.

**Planning/ Site History**

2.17. The site has been the subject of three historic planning applications, all relating to residential development proposals between 1970 and 1990. There is no evidence that any of these permissions were implemented, they are therefore considered to be of limited relevance due to their age. No further planning applications have been recorded on the site since the year 2000.

2.18. The Site has been identified as part of a preferred allocation (M6) within the emerging St Albans Local Plan (“eLP”) and is also included in the supporting Housing and Economic Land Availability Assessment (HELAA) under reference R-18-21. Through these initial assessments, the site has been recognised as a sustainable and appropriate location to contribute towards meeting the Councils future housing needs and continues to form part of the Council’s preferred strategy for growth.

### 3. SECTION 3 - THE PROPOSED DEVELOPMENT

#### **Project Vision**

- 3.1. The vision for the site is to create a sensitively designed residential scheme which reflects the character of Redbourn while providing much-needed new homes, including affordable housing. The development will enhance local connections by improving access to the Nickey Line and the River Ver corridor by delivering new pedestrian and cycle links and a network of green spaces. High-quality design, sustainable drainage, and biodiversity enhancements will ensure that the scheme integrates naturally into its setting, contributing positively to the village and the wider landscape setting.

#### **Overview of outline application**

- 3.2. The Outline planning application submission seeks permission for the construction of up to 35 dwellings, with all matters reserved except for access. The description of development is therefore as follows;

**Outline planning application with all matters reserved except for access for the erection of up to 35 residential dwellings including affordable housing with provision of vehicular access from Crown Street and pedestrian and cycle accesses, alongside public open spaces, including Suitable Alternative Natural Greenspaces, sustainable urban drainage systems, landscaping, infrastructure and earthworks**

- 3.3. The application is supported by a Parameters Plan (ref: edp2974\_d054d, **Appendix 2**), which establishes the framework for future Reserved Matters applications. The plan defines the net developable area for built development, together with the location of amenity spaces, attenuation features, and the principal connectivity links and access points within the site.
- 3.4. In addition, the application is supported by an Illustrative Masterplan (Drawing No. edp2974\_d010b, **Appendix 3**), which demonstrates how the proposed development could come forward in accordance with the identified parameters. This demonstrates the following overarching principles of the development:

- The development will be contained within a defined net developable area of approximately 0.96ha, accommodating up to 35 dwellings with a mix of house types and sizes.
- Around 2.37ha of land will be delivered as Suitable Alternative Natural Greenspace (“SANG”), alongside 0.30ha of amenity greenspace providing play areas, informal recreation, and incidental green verges.
- A comprehensive Sustainable Drainage System (“SuDS”) will be incorporated, including approximately 0.24ha of attenuation areas and an established surface water storage area will be located to the north of the site, designed to manage surface water naturally and enhance local flood resilience.
- Vehicular access will be taken from Crown Street, supported by a hierarchy of internal routes with pavements and shared surfaces to promote safe and legible movement through the site for vehicles and pedestrians.
- A network of pedestrian and cycle access routes will connect the site to Waterend Lane and Harpenden Lane, promoting sustainable travel choices and integrating with the PRoW.
- Existing vegetation will be retained and enhanced wherever possible, with new woodland and wetland planting to strengthen ecological connections, support local biodiversity, and maintain the abundance of trees and woodland across the site.
- The scheme will integrate with the River Ver, providing new footpaths, mown grass routes, and a proposed footbridge to allow for public access and enjoyment of the important natural feature.
- The development will be structured around existing landscape features, including mature trees, hedgerows, and the River Ver corridor, creating a green and well-integrated extension to Redbourn. The form and density of development will respond sensitively to the surrounding village context, ensuring the new homes complement the established character of Redbourn.

### **Pre Submission Engagement**

3.5. A pre-application submission was made to the Council in December 2022, with a formal response received in March 2023, although this pre application advice request was on the basis of 49 units. Overall, the response was constructive, identifying areas of support and those requiring further evidence or refinement prior to submission. The key points of the Council’s formal response are summarised below:

- Council had concerns given the sites metropolitan Green Belt designation, though the Council acknowledged a significant housing land supply shortfall.
- The Council identified that the site had logical access from Crown Street, with good site connectivity.
- The Council requested a full Landscape and Visual Impact Assessment (“LVIA”) would be required along with a tree survey, noting sensitive views from the Nickey Line and the River Ver corridor.
- The Council identifies that the Site lies within the Chilterns Beechwoods Special Area of Conservation (“SAC”) Zone of Influence, and advised that a Strategic Access Management and Monitoring (“SAMM”) payment and SANG contribution would likely be required.
- The Council advised that design detail was needed to confirm compliance with Nationally Described Space Standards (“NDSS”).
- The Council identified that most of the site lies within Flood Zone 3b, though the built area remains outside this. A Flood Risk Assessment and early engagement with the Environment Agency was recommended.
- Contributions towards primary and secondary education and leisure facilities were identified, with no healthcare contribution required.

3.6. Since this time, the Site has been identified as a preferred allocation within the eLP and therefore identified as a suitable and deliverable location for growth. The eLP is now at an advanced examination stage.

### **Built form and Layout**

- 3.7. Whilst layout and scale are reserved for a future determination the Illustrative Masterplan (**Appendix 3**) demonstrates one way in which the development could be progressed at the detailed design reserved matters stage.
- 3.8. The Illustrative Masterplan demonstrates that the development parameters applied for would allow for a development that delivers up to 35 residential dwellings, built at an appropriate density of circa. 20 dwellings per hectare (gross, excluding highway land) / 35 dwellings per hectare (net, within developable areas on parameter plan), ensuring the most effective use of the land is made while reflecting the character of the Site and its surroundings.
- 3.9. The Design and Access Statement (“DAS”) accompanying this application explains the design concept of the proposal in further detail, explaining how the approach adopted has fully considered the key constraints and opportunities the Site affords.
- 3.10. The design approach seeks to ensure a comprehensive high-quality development can be delivered on the Site in a way that responds to the character and setting of the Site and how it can integrate with the contextual surroundings of Redbourn.

### **Design and Appearance**

- 3.11. While the matter of appearance is reserved for determination at a later date, the DAS details the design concept and principles which underpin the illustrative masterplan, demonstrating how it has been informed by an analysis of Redbourn’s local character.
- 3.12. A range of design principles and strategies have been identified including:
- A design which draws inspiration from Redbourn’s traditional scale, form, and materials such as simple pitched roofs, brick and timber detailing, and variation in frontage treatments.
  - Buildings of predominantly two storeys, arranged in short terraces and primary detached to create a domestic scale and varied streetscape
  - Public footpaths and mown grass routes which connect through the landscape to a new footbridge across the River Ver, improving accessibility and allowing residents to engage with nature.

- A clear hierarchy of streets, together with pedestrian and cycle links to Harpenden Lane, Crown Street, and Waterend Lane, ensures permeability and promotes sustainable movement within and beyond the site.
- Sustainable and resilient design through the incorporation of SUDs electric vehicle infrastructure, and biodiversity-rich landscaping to manage water sensitively and support the wider ecological network.
- A mix of informal open spaces, children’s play areas to create spaces that foster community interaction and will be well-overlooked by neighbouring dwellings to encourage safe and secure use by residents, contributing to a high-quality public realm.

### **Landscape**

3.13. While the detailed landscaping scheme will be submitted at Reserved Matters stage, the Illustrative Landscape Strategy within the Landscape and Visual Impact Assessment (“LVIA”) sets out how the proposal can positively respond to the wider landscape character. The emerging strategy is landscape-led and demonstrates how key principles have been embedded in the illustrative layout. These include:

- Landscape-led structure arranged around the River Ver corridor and existing mature vegetation, ensuring strong integration with the surrounding countryside and safeguarding Redbourn’s rural setting.
- A strong green framework including new woodland planting, meadow grassland and wetland habitats, that will soften the development edge while enhancing biodiversity
- Retention of existing boundary vegetation to the east and existing tree cover in the south of the Site will be retained and managed to conserve local character.
- Native tree and shrub planting, including species locally characteristic of the Upper Ver Valley, will be introduced within public open spaces, along internal streets, and throughout the proposed development.
- Existing PRow connections will be retained and improved, with new informal footpath links providing additional recreational opportunities and stronger connections to the wider network.

3.14. Together, these measures will deliver a coherent and high-quality green infrastructure framework that will assist in successfully integrating the development into the wider landscape. In parallel, the landscape strategy will provide significant new opportunities for recreation and leisure. These combined measures will help protect the visual amenity and landscape character, maintain commuting and foraging opportunities for wildlife, and contribute to a well-connected and biodiverse green setting for future residents.

### **Dwelling Mix**

3.15. The development will provide up to 35 homes, of which 60% will be delivered as open market housing and 40% as affordable dwellings.

3.16. The final mix will be determined at the Reserved Matters stage, taking account of detailed design considerations, local housing need, and market demand. However an indicative breakdown of the potential housing mix is set out in the following table, based on the most up-to-date housing needs evidence published by the Council. This approach seeks to deliver a balanced and inclusive community, providing a range of home sizes and tenures that reflect the character and housing needs of Redbourn.

	<b>Total</b>	<b>Market</b>	<b>Affordable</b>
<b>Total No</b>	<b>35</b>	<b>21</b>	<b>14</b>
<b>1 Bedroom</b>	<b>4</b>	<b>0</b>	<b>4</b>
<b>2 Bedroom</b>	<b>10</b>	<b>5</b>	<b>5</b>
<b>3 Bedroom</b>	<b>15</b>	<b>10</b>	<b>5</b>
<b>4+ Bedroom</b>	<b>6</b>	<b>6</b>	<b>0</b>

*Table 3 - Indicative Housing Mix Table*

### **Access and Parking**

3.17. Primary access to the site will be provided via a new dedicated priority junction from Crown Street (Drawing Ref - 70110083-SK-006 - P01) which will also accommodate emergency vehicle access. The access has been positioned to ensure safe visibility and efficient operation within the local road network which also supports pedestrian and cycle safety.

3.18. Additional pedestrian connections will also be created to the north and south of the site, linking to Crown Street, Waterend Lane, and Harpenden Lane. These routes will provide enhanced connectivity through utilising the existing ProW route and facilitate direct access

to the services and facilities on Redbourn High Street, as well as to local bus stops along Lamb Lane and Harpenden Lane.

3.19. The illustrative layout demonstrates parking provision in accordance with the Roads in Hertfordshire: Highway Design Guide (3rd Edition) and the St Albans Revised Parking Policies and Standards (January 2002). Electric Vehicle (EV) charging provision will also be incorporated in line with the principles of Hertfordshire's Local Transport Plan (LTP4) and the requirements of Part S of the Building Regulations. Final parking numbers and detailed design will, however, be determined at the Reserved Matters stage.

3.20. Cycle parking will be provided in accordance with the Roads in Hertfordshire: Highway Design Guide (3rd Edition), with secure storage located within garden sheds or garages for houses, and in dedicated, secure areas for any on site flats. The detailed quantum and design of cycle storage will be confirmed through a future Reserved Matters application.

#### **Energy and Sustainability**

3.21. While detailed layout and design will be determined at the Reserved Matters stage, this Outline application establishes the overarching principles for how development on the site will meet the Council's aspirations for energy efficiency, and climate resilience. The approach draws upon relevant national and local guidance, including the National Planning Policy Framework ("NPPF") 2024, The St Albans Sustainability and Climate Crisis Strategy (2024-2027), The Sustainable Hertfordshire Strategy (2022) and The Redbourn Neighbourhood Plan (2020 – 2038).

3.22. This includes a commitment, through the submission of a Climate Statement to ensure that the proposed development incorporates sustainable design measures and climate mitigation principles. These will address key factors such as

- Buildings will be designed to meet the Future Homes Standard, incorporating high levels of insulation, airtightness, and passive design measures to optimise thermal performance. The layout will seek to maximise southerly orientation for solar gain, provide landscaping buffers for wind protection, and minimise overshadowing.
- Renewable technologies such as roof-mounted solar panels and air- or ground-source heat pumps, will be explored and provided where required in line with building regulations.

- The retention of existing trees and the planting of new native species will help create comfortable microclimates providing natural shading and cooling across the site.
- Water sensitive design; through integration of green infrastructure and SUDS to manage surface water. Building specifications and targets will be established to reduce domestic water consumption, aiming to achieve the government's target of 110 litres per person per day by 2050.
- Construction and operational waste will be managed in line with the principles of the Waste Hierarchy, prioritising prevention, re-use, and recycling.
- Promoting sustainable modes of travel, including walking, cycling, and public transport, to reduce reliance on private car. Measures will include the provision of electric vehicle charging points, convenient pedestrian and cycle connections to off-site facilities, and the promotion and support of public transport services

#### **Drainage**

- 3.23. Surface water drainage on site will be managed through the use of SuDS, incorporating permeable paving, swales, and detention basins. Surface water runoff generated by the proposed development will discharge to the River Ver, the nearest surface water body, at restricted to greenfield runoff rate to minimise against any future flooding scenarios.
- 3.24. The submitted Flood Risk Assessment ("FRA") includes an indicative drainage scheme based on the principles of the illustrative layout. This identifies two attenuation basins located to the east of the developable area, positioned outside the predicted peak fluvial flood extents. In addition, the proposed remediation strategy in the northern part of the site has presented an opportunity to formalise the existing surface water flow path through the site through the incorporation of a surface water storage area.
- 3.25. Foul drainage for the development will be managed in accordance with the accompanying Foul Water Statement ("FWS"). This confirms that foul flows from the proposed development can be accommodated within the existing Thames Water sewerage network and an indicative gravity-based rerouting solution has been identified that can connect the existing network upstream and downstream.

## 4. SECTION 4 – LOCAL AND NATIONAL POLICY CONTEXT

4.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 establishes that the determination of a planning application must be in accordance with the ‘Development Plan’, unless material considerations indicate otherwise. In this context the Development Plan of relevance to the proposal comprises of the following;

- St Albans Local Plan (1994); and updated Saved and Deleted Policies addendum (2020)
- Hertfordshire Minerals Local Plan (2002 – 2016).
- The Hertfordshire Waste Core Strategy and Development Management Policies (2012)
- The Redbourn Neighbourhood Plan (2020 – 2038)

4.2. The Council has also adopted a number of Supplementary Planning Documents (“SPDs”) to support specific policy areas of the St Albans Local Plan Review (1994); Those relevant to the proposed development are as follows:

- Design Advice – leaflet 1
- Revised Parking Policies and Standards (2002)
- Affordable housing SPD (2004)

4.3. The Council is in the process of preparing its new Local Plan (2041) (prior reference as “eLP”), once adopted, will replace the St Albans Local Plan Review (1994). The eLP was submitted to the Secretary of State for Examination in December 2024, with Examination sessions taking place across December and February 2026.

4.4. The National Planning Policy Framework (“NPPF”)- December 2024, and National Planning Practice Guidance (“NPPG”) -various dates, set out the Government’s planning policy and guidance across England. These are important material considerations in the determination of this application.

### **St Albans Local Plan Review (1994)**

4.5. The St Albans Local Plan (1994) was adopted in November 1994 and sets out the planning strategy and policies for the plan period up to 2007. Given the age of The St Albans Local Plan (1994), the Council has since published a ‘Saved and Deleted Policies Version (2020)’

to assist the public in identifying which policies from the 1994 Local Plan remain in force and which are expired. Considering this the relevant policies to the proposed development have been summarised below.

- 4.6. The Metropolitan Green Belt Policy 1 establishes a strong presumption against inappropriate development in the Green Belt unless located within a defined settlement or justified by very special circumstances. It seeks to ensure new development integrates sensitively with the landscape, maintains openness, and avoids harm to the countryside's ecological value.
- 4.7. The Settlement Strategy Policy 2 seeks to protect and enhance the character of existing settlements while directing growth to specified settlements excluded from the Green Belt, including Redbourn. Development proposals are assessed not only for their individual impact but also for their cumulative effect on settlement form and character.
- 4.8. New Housing Development and Affordable Housing Policies 3–5 guide residential development within towns and specified settlements, encouraging housing on appropriate sites
- 4.9. Highway Improvements and Access Development Policy 34 states that generating significant traffic or new highway access must demonstrate acceptable impacts on road safety, capacity, and the local highway hierarchy.
- 4.10. Location of Development and Public Transport Policy 36a promotes sustainable transport by encouraging development in locations with good access to the public transport network.
- 4.11. Residential Parking Standards Policy 39 sets out requirements for adequate off-street parking provision, ensuring layouts respect the character of the area and support safe and efficient movement.
- 4.12. General Design and Layout Policy 69 requires a high standard of design across all development, taking account of local context, built form, materials, scale, and the relationship with neighbouring uses.
- 4.13. Design and Layout of New Housing Policy 70 demonstrates that new housing should be designed with regard to its setting and the character of the surrounding area. Layouts should provide an appropriate mix of dwellings, ensure good access, parking, privacy, orientation, and high-quality amenity space.

- 4.14. Landscaping and Tree Preservation Policy 74 states that healthy trees, hedgerows, ponds, and other important landscape features should be retained where possible.
- 4.15. Flood Risk and Water Management Policy 84 outlines that areas at risk of flooding will not normally be permitted and Proposals must ensure flood risk is not increased elsewhere, and that appropriate buffers and maintenance access are provided along main rivers and watercourses.
- 4.16. Drainage Infrastructure Policy 84a seeks to ensure that new development does not increase the risk of sewerage flooding or lead to an unacceptable increase in risk locally or downstream.

**Hertfordshire Minerals Local Plan (2002 – 2016)**

- 4.17. The Hertfordshire Minerals Local Plan (2002–2016), adopted in March 2007, sets out the strategy for minerals extraction, safeguarding areas, and development management policies. A review of the associated Policies Map confirms that the site does not lie within a designated Minerals Safeguarding Area and is not in proximity to any active quarry. Accordingly, there are no specific minerals policies that are relevant to the determination of this application.

**The Hertfordshire Waste Core Strategy and Development Management Policies (2012)**

- 4.18. The Hertfordshire Waste Core Strategy and Development Management Policies (2011–2026), adopted in November 2012, sets out the spatial vision and strategic objectives for sustainable waste planning across the county, including the identification of sites for waste management facilities. A review of the associated Policies Map confirms that the site does not lie within a designated area for waste management, nor is it in proximity to any existing facility. Accordingly, there are no specific waste policies that are directly relevant to the determination of this application.

**The Redbourn Neighbourhood Plan (2020 – 2038)**

- 4.19. The Redbourn Neighbourhood Plan (“RBNP”), covering the period 2020–2038, was formally adopted in January 2023. The RBNP establishes a vision for the future of the parish supported by a set of objectives. The RBNP forms part of the statutory development plan

for the area and provides local context to guide development within the parish. The policies of particular relevance to the proposed development are summarised below.

- 4.20. Policy RED4 Biodiversity – developments are expected to deliver a minimum 10% net gain in biodiversity, ideally on-site, guided by the Natural England Biodiversity Metric and the Redbourn Design Guidance and Codes.
- 4.21. Policy RED5 Housing Mix - Major developments should deliver a balanced mix of dwelling types, with at least 40% affordable housing subject to viability. Affordable homes should be tenure-blind and of the same design quality and material palette as market units, with a strong emphasis on meeting local housing needs and supporting community cohesion.
- 4.22. Policy RED6 New Housing Sites - New housing must comply with Green Belt policy and prioritise accessible locations within 800m of key services. Proposals should respect local character, minimise environmental impact, avoid noise and heritage conflicts, and secure biodiversity net gain. Developments near the Chiltern Beechwoods SAC also require a Habitats Regulations Assessment (“HRA”).
- 4.23. Policy RED9 Active Travel - Major schemes should actively support walking and cycling through the creation or enhancement of safe, direct, and inclusive routes. New developments must demonstrate how they reduce car dependency and integrate with existing pedestrian and cycle networks, in line with local and county active travel strategies.
- 4.24. Policy RED10 High Quality Design - A design-led approach is required to ensure new development is sympathetic to Redbourn’s character and settlement pattern. Proposals should promote active frontages, legibility, and green infrastructure while managing parking sensitively.
- 4.25. Policy RED11 Sustainable Design - Proposals should aim for high energy efficiency and low carbon design, encouraging the use of renewable energy, EV charging, and sustainable construction methods such as the ‘Passivhaus Principles’. Development should respond positively to local character while incorporating measures that enhance environmental performance and reduce carbon emissions.

#### **Supplementary Planning Documents**

- 4.26. The accompanying SPDs relevant to this proposal include Part 1: Design Advice Leaflet (approved 1998), the St Albans Parking Revised Policies and Standards, adopted in January 2002 and the Affordable Housing SPD adopted in March 2024.
- 4.27. In terms of the Council's Design Advice Leaflet it provides practical guidance on achieving high-quality design and layout for new residential development under Policy 70 of The St Albans Local Plan (1994). It emphasises the importance of respecting local character, ensuring pleasant relationships between buildings and spaces, and avoiding cramped or generic layouts.
- 4.28. However, the leaflet was produced over twenty-five years ago and design expectations have evolved since its adoption. National design guidance, and updates to the NPPF set out a more comprehensive framework for creating sustainable and well-designed places. Accordingly, while the leaflet provides historical design context, it is of limited weight in assessing modern design quality.
- 4.29. The St Albans Revised Parking Policies and Standards (2002) adopt a zonal approach to parking provision, setting maximum standards in line with the then-current national guidance (PPG13). While the document sought to manage car use and encourage sustainable transport, it is now of considerable age and does not reflect current travel behaviour, EV requirements or current NPPF direction. The Hertfordshire Highway Design Guide – 3rd Edition (Design Standards and Advice, 2011) provides a more up-to-date design framework and should therefore be afforded greater weight in guiding parking and access arrangements.
- 4.30. The Affordable Housing SPD (March 2004) was prepared to assist in implementing affordable housing policy and to support the creation of mixed and sustainable communities. The document sets out the Council's approach to negotiating affordable housing contributions on suitable development sites, clarifying definitions, tenure types, site thresholds, and mechanisms (including Section 106 agreements) for securing affordable units. While the SPD remains a material consideration, it is important to note its age (being over twenty years old) and accordingly it should be considered in the context of more up-to-date local plan policy and national guidance.

**The emerging Redbourn Local Plan (2041) (Part A)**

- 4.31. The Council is currently in the process of preparing an eLP which will cover the period 2024–2041. The eLP Part A sets out the planning policies and proposals for the future development of the City and District of St Albans. It establishes the Council’s long-term spatial strategy for delivering and managing development, infrastructure, and environmental protection and enhancement across the District to 2041.
- 4.32. The eLP is now at an advanced stage of preparation, currently undergoing independent examination in accordance with Regulation 24 of the Town and Country Planning (Local Planning) (England) Regulations 2012. In accordance with paragraph 49 of the NPPF, weight may be afforded to policies in an emerging plan according to its stage of preparation and its degree of consistency. Given the advanced stage of the eLP and its strong alignment with the Framework, it is considered that weight can be attributed to its emerging policies in the determination of this application which have been summarised as follows.
- 4.33. Policy SP1 Spatial Strategy - Sets a long-term spatial strategy for St Albans District to 2041, aiming to direct growth in a sustainable and coordinated manner. Broad areas identified in the Settlement Map are designated as focal points for housing, employment, services, and accessibility, with growth planned to meet the Government’s housing requirements. The Council proposes to allocate land to deliver at least 15,045 net additional homes (approximately 885 homes per year) over the plan period.
- 4.34. Policy SP2 Responding to the Climate Emergency - Proposals are expected to address climate change through mitigation and adaptation, including reductions in carbon emissions, high energy efficiency, use of renewables, water efficiency, and sustainable transport measures.
- 4.35. Policy CE1 Promoting Sustainable Design, Construction and Building Efficiency- States new development must demonstrate sustainable design, construction, and resource efficiency.
- 4.36. Policy SP3 Land and the Green Belt - Seeks to protect the Green Belt while accommodating housing needs, making selective boundary adjustments where necessary. While safeguarding the wider Green Belt’s character and openness.
- 4.37. Policy LG4 Large, Medium and Small Sites allocated and windfall sites - Outlines that sites of this nature must be masterplanned and coordinated, integrating with the existing transport network and local communities with proposals demonstrating excellence in

design, energy and water efficiency, retention of key landscape features, biodiversity enhancement, contributions to local infrastructure, recreation, and heritage mitigation.

- 4.38. Policy LG6 Green Belt Compensatory Improvements – States where development involves Green Belt changes, sites must submit a compensation strategy that enhances green infrastructure and existing hedgerows, trees, and PRoW must be retained or replaced.
- 4.39. Policy HOU1 Housing Mix – Expects major developments to provide a balanced mix of dwelling types and sizes to meet current and future housing needs.
- 4.40. Policy HOU2 Affordable Housing – Requires sites delivering 10+ homes, to provide 40% affordable housing with a tenure mix reflecting social rent, affordable rent, and home ownership (including First Homes).
- 4.41. Policy HOU4 Accessible and Adaptable Housing - Requires new residential development to deliver homes that meet changing lifetime needs, ensuring accessibility and adaptability. All dwellings should comply with Building Regulations Part M4 standard.
- 4.42. Policy SP8 Transport Strategy - Promotes a transport hierarchy that prioritises walking, cycling and public transport to reduce car dependency and seeks to embed sustainable travel choices in new and existing communities.
- 4.43. Policy TRA1 Transport Considerations for New Development - Requires developments to provide safe and suitable access for all users, avoiding adverse impacts on the local or strategic transport network.
- 4.44. Policy TRA4 Parking - Ensures development provides appropriate levels of car, cycle, and disabled parking and provision should reflect site accessibility and encourage sustainable travel.
- 4.45. Policy SP9 Utilities Infrastructure - Supports the timely and coordinated delivery of essential utilities, including water, energy, drainage, and digital infrastructure.
- 4.46. Policy SP10 Natural Environment, Biodiversity and Green and Blue Infrastructure - Seeks to protect and enhance the District’s natural environment, prioritising biodiversity, recreation, and climate resilience. The policy also applies special protection to the Chilterns Beechwoods Special Area of Conservation (“CBSAC”), requiring mitigation measures such as SAMMS contributions or provision of SANG

- 4.47. Policy NEB1 Woodlands, Trees and Landscape Features - Requires the protection of existing trees and woodland and promotes increased tree cover, including at least one semi-mature tree per new dwelling.
- 4.48. Policy NEB5 Blue Infrastructure – Protects and enhances the District’s rivers, watercourses, and rare chalk streams.
- 4.49. Policy NEB6 Biodiversity and Biodiversity Net Gain – Requires proposals to enhance ecological connectivity and integrate new habitats informed by local ecological advice and data.
- 4.50. NEB7 Biodiversity in Design – Requires integration of biodiversity within the built environment and for developments to maximise ecological opportunities through sensitive layout and landscaping design that supports local wildlife.
- 4.51. Policy NEB8 Managing Flood Risk - Requires development to meet national flood risk and drainage standards, incorporating SuDs to achieve greenfield runoff rates where feasible.
- 4.52. Policy NEB10 Landscape and Design – Ensures proposals retain and enhance existing landscape features, use native planting, integrate SuDS, and support biodiversity and visual amenity.
- 4.53. Policy NEB12 Green Space Standards and Provision - Ensures new development provides accessible, multi-functional green spaces that meet the needs of new and existing residents. Green space design should support recreation, biodiversity, and SuDS functions.
- 4.54. Policy SP11 Historic Environment - Seeks to conserve and enhance the historic environment while accommodating growth.
- 4.55. Policy SP12 High Quality Design - Requires new development to achieve high-quality, context-responsive design with proposals making efficient use of land, to deliver a high standard of amenity for all users.
- 4.56. Policy DES1 Design of New Development - Ensures new development respects the local context and settlement pattern through layout, scale, and design.

- 4.57. Policy DES3 Efficient Use of Land - Promotes efficient and sustainable use of land by requiring residential development to achieve at least the density of the existing context or a minimum of 40 dwellings per hectare.
- 4.58. Policy DES5 Residential Amenity Standards - Requires development to protect the amenity of existing and future occupants.
- 4.59. Policy SP13 Health and Wellbeing - Promotes healthy and inclusive communities by encouraging active travel, accessible green and blue spaces, opportunities for play and recreation, and the integration of nature.
- 4.60. Policy HW1 Air and Noise Pollution - Requires sensitive development to assess and mitigate noise and air quality impacts.
- 4.61. Policy SP14 Delivery of Infrastructure - Requires development to provide or contribute to the necessary physical, social, and green infrastructure to mitigate its impacts.

**The emerging Redbourn Local Plan (2041) (Part B)**

- 4.62. The eLP also includes a Part B: (Site Allocations), which identifies specific sites across the District to deliver the Council’s overall spatial strategy. Part B sets out detailed development requirements for each allocation, including indicative housing figures, infrastructure provision, and design principles.
- 4.63. The proposed development site forms part of the wider residential allocation identified under Policy M6 – South of Harpenden Lane, Redbourn (AL3 7RQ). The wider site, extending to approximately 12.04 hectares is subject to a series of development criteria which guide future development use across the allocation area. These requirements have been summarised as follows
- There is to be no built form within Flood Zone 3b and any development is to be limited to Flood Zone 1 with an Exception Test due to fluvial flood risk being required.
  - Safe pedestrian and cycle access must be provided from Redbourn, avoiding direct access from the A5183.
  - Development should support measures in the Local Cycling and Walking Infrastructure Plan (“LCWIP”) and Growth and Transport Plans (“GTPs”).

- Proposals must provide active travel links to the Nickey Line and support its enhancement.
- Contributions will be sought towards improved connectivity of the Nickey Line to Redbourn and Harpenden are encouraged, including better surfacing, lighting, and crossings.
- Development must take account of existing Tree Preservation Orders within the site.
- The layout should minimise harm to the setting and significance of the Redbourn Conservation Area.
- Proposals should enhance the River Ver's biodiversity and provide attractive, accessible public spaces along its corridor.
- Contributions are required towards the SAMMS and the provision or maintenance of a SANG in relation to the CBSAC.
- Development must consider local environmental designations, including Source Protection Zone 3 and the underlying bedrock aquifer.

### **The National Planning Policy Framework**

4.64. The latest version of the NPPF was published in December 2024, with a subsequent update in February 2025. The NPPF sets out the Government's planning policies for England and how they should be applied. It provides the framework for where development should occur, and how the built and natural environment should be protected. The following key sections of the NPPF (2024) are relevant material considerations for this application.

#### *Achieving Sustainable Development*

4.65. Section 2 of the NPPF sets out three overarching objectives to achieve sustainable development — economic, social and environmental. These are not individual criteria for every decision but guiding principles to secure balanced and locally responsive outcomes. Paragraph 11 confirms that, for decision-taking, the presumption in favour of sustainable development means approving proposals that accord with an up-to-date development plan without delay, or where policies are out-of-date, granting permission unless specific protective policies indicate otherwise, or adverse impacts would significantly and demonstrably outweigh the benefits.

#### *Delivering a sufficient supply of homes*

4.66. Section 5 of the NPPF emphasises the Government’s objective to significantly boost the supply of homes by ensuring that a sufficient amount and variety of land is available where needed, addressing the needs of different groups, and ensuring that land with permission is brought forward without unnecessary delay.

*Promoting Healthy and Safe Communities*

4.67. Section 8 seeks to achieve healthy, inclusive and safe places, ensuring access to social, recreational and cultural facilities. Development should provide attractive, well-designed, legible pedestrian and cycle routes and high-quality public spaces that encourage active use and social interaction.

*Promoting Sustainable Transport*

4.68. Section 9 promotes sustainable transport by ensuring that transport considerations are integrated from the earliest stages of design and ensuring that developments should:

- Address the potential impacts of on transport networks;
- Maximise opportunities from transport infrastructure and evolving technologies;
- Promote walking, cycling and public transport.
- Mitigate environmental impacts of traffic and infrastructure.
- Ensure movement, streets, parking and transport are integral to creating high-quality places.

4.69. In addition to this, Paragraph 110 acknowledges that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.

*Making Effective Use of Land*

4.70. Section 11 requires that policies and decisions promote the effective use of land, meeting housing and other needs while safeguarding the environment and ensuring healthy living conditions. It also supports development of under-utilised land and buildings, particularly where this helps to meet identified housing needs in constrained areas.

*Achieving Well-designed Places*

4.71. Section 12 of the NPPF attaches great importance to achieving well-designed places, recognising that good design is integral to sustainable development requiring policies and decisions to ensure that development:

- Functions well and contributes positively to the area over the long term;
- Is visually attractive through good architecture, layout, and landscaping;
- Is sympathetic to local character and history while supporting appropriate innovation
- Establishes a strong sense of place through the arrangement of streets, spaces, and materials to create distinctive, welcoming environments.

*Protecting Greenbelt Land*

4.72. Section 13 of the NPPF confirms that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. Inappropriate development should only be approved in Green Belt in ‘very special circumstances’, where the benefits clearly outweigh the harm.

4.73. The 2024 NPPF introduces the concept of ‘grey belt’, where development in the Green Belt would not be considered inappropriate.

*Meeting the Challenge of Climate Change, Flooding and Coastal Change*

4.74. Section 14 of the NPPF outlines that inappropriate development in areas at risk of flooding should be avoided by directing proposals to areas of lowest risk wherever possible.

*Conserving and Enhancing the Natural Environment*

4.75. Section 15 establishes that the planning system should contribute to and enhance the natural environment with development minimising impacts on biodiversity and deliver measurable net gains, supporting wider objectives for nature recovery, landscape protection, and green infrastructure enhancement.

*Conserving and Enhancing the Historic Environment*

4.76. Section 16 requires proposals to assess and describe the significance of any heritage assets affected, with a level of detail proportionate to their importance.

*Decision-Making*

4.77. Section 4 of the NPPF directs that local planning authorities should approach decision-making in a positive and creative way, working proactively with applicants to secure developments that improve the economic, social, and environmental conditions of the area and deliver sustainable outcomes.

## 5. SECTION 5 – PLANNING APPRAISAL

5.1. This section of the report sets out an appraisal of the proposed development against the issues raised in the relevant planning policy and guidance. A topic-based approach is taken in respect of the prevailing planning considerations, with due regard to the earlier rehearsed planning policies at national and local level and other material considerations.

5.2. In compiling this application submission, it has been possible to identify the following overarching planning considerations:

- Need for Housing and Land Supply Position
- Principle of Development
- Design Approach and Placemaking
- Affordable Housing and Housing Mix
- Public Open Space
- Landscape and Visual Impact
- Green Belt
- Transport and Access
- Flood Risk and Drainage
- Foul Drainage
- Ecology
- Biodiversity Net Gain
- Arboriculture
- Air Quality
- Noise
- Heritage
- Ground Conditions / Contamination
- Utilities
- Planning Obligations and S016 heads of terms.

### Need for Housing and Land Supply Position

- 5.3. Paragraph 61 of the NPPF (2024) makes it clear that it is the Government’s objective to ‘significantly boost the supply of homes’, emphasising the importance of ensuring that a sufficient amount and variety of land can come forward where it is needed.
- 5.4. Recent National Government statements and proposed reforms to the planning system place clear emphasis on accelerating the delivery of homes across the UK, reflecting the acute housing shortage and the urgent need to increase supply. The NPPF (2024) is directed towards ensuring that sufficient land is available to meet housing demand, address affordability pressures, and provide for groups with specific housing requirements, with a national ambition to deliver 1.5 million new homes across the parliamentary term. This underscores the expectation that local planning authorities should actively facilitate housing delivery to respond to both national objectives and local needs.
- 5.5. The proposed development therefore aligns with the national imperative to deliver a greater number of good quality homes in suitable and sustainable locations. The proposed development can come forward at pace contributing positively towards meeting national housing targets and supporting the drive to significantly boost the supply of homes.
- 5.6. This issue is particularly significant in the local context given the Council’s critically low housing land supply position. The Council’s latest 5YHLS statement, as reported through the Authority Monitoring Report dated 31 March 2024, identifies a supply of only **0.83 years** of deliverable housing sites.
- 5.7. This equates to a potential housing supply of approximately 1,764 dwellings over the period 2024–2029, against the Government’s identified housing requirement of 1,660 dwellings per annum, or 8,300 dwellings over five years (this is including a 20% buffer). The scale of this shortfall is substantial.
- 5.8. The consequences of unmet housing needs across the District are significant and far-reaching. St Albans is experiencing acute affordability pressures, with an affordability ratio of 15.6, indicating that average house prices are over 15 times average earnings. The continued failure to meet identified housing needs risks further exacerbating affordability challenges and widening barriers to home ownership across the authority.

- 5.9. Affordable housing delivery within the District is also falling substantially below identified requirements. The Authority Monitoring Report (2024) records 139 completions, against an annual target of 200 affordable dwellings (equating to approximately 35% of total housing delivery). The previous year's report (2023) identified only 68 completions, indicating a persistent shortfall.
- 5.10. Further evidence of underperformance is provided through the Government's Housing Delivery Test ("HDT") results, which confirm that St Albans City and District Council has consistently fallen significantly short of required delivery levels. The most recent published figure (2024) identifies delivery at 52% of the housing requirement over the preceding three-year period, representing a critically low rate of performance.
- 5.11. The tilted balance is therefore engaged, meaning that planning permission should be granted unless the application of policies in the NPPF (2024) provide a clear reason for refusal, or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the Framework as a whole.
- 5.12. The Council should therefore be actively supporting suitable and deliverable opportunities to increase supply of housing across the District and the proposed development site presents a sustainable opportunity to deliver up to 35 units.

#### Principle of Development

- 5.13. The principle of development for the Site is influenced by the current policy context, within which the tilted balance in paragraph 11(d) of the NPPF (2024) is engaged. As set out above, St Albans District is experiencing an acute housing crisis. As a result, the policies for determining housing proposals are considered out-of-date given the adopted St Albans Local Plan (1994) is now over three decades old and does not reflect modern policy expectations.
- 5.14. The RBNP was made in July 2023, however, it does not allocate any land for housing development. As a result, criterion 14(b) of the NPPF is not satisfied, meaning the presumption remains engaged.
- 5.15. The proposal would deliver up to 35 new homes, including affordable housing. When assessed against the three overarching objectives of sustainable development set out in

Section 2 of the NPPF 2024 (economic, social and environmental), the development represents a sustainable opportunity to contribute positively to the District's growth needs.

5.16. The proposed development would deliver clear sustainability benefits, consistent with the overarching objectives set out in Section 2 of the NPPF (2024). These benefits would arise both during construction and throughout the lifetime of the scheme, contributing positively to the vitality of Redbourn and supporting the District's wider growth ambitions. Collectively, these include

A Social Role:

- The delivery of up to 35 new homes will help support the creation of an additional community in Redbourn.
- The scheme will widen local housing choice by providing a mix of dwelling types and tenures that respond to identified needs.
- The inclusion of affordable housing will make a meaningful contribution to addressing the District's acute affordability pressures and reducing inequalities.
- The provision of high-quality public open space, including enhanced accessible green space and SANG, will support health and wellbeing by offering opportunities for recreation, social interaction and informal play.
- New pedestrian and cycle connections through the site will strengthen local movement networks, improving safe and direct links between Harpenden Lane, Waterend Lane and surrounding areas.

Economic Role

- The development will generate additional local expenditure from future residents on goods and services which will support the vitality and viability of Redbourn's existing shops, and community facilities
- The increased population will potentially help sustain local employment areas, including Redbourn Industrial park, by expanding the local labour pool.

- The scheme will deliver direct and indirect employment opportunities during the construction phase, contributing to the local and regional economy.
- Following completion, the development will provide ongoing economic benefits through increased Council Tax revenue returns to the Council.
- By helping to meet unmet housing need, the scheme also facilitates broader economic growth across the District, ensuring that labour supply constraints do not hinder business investment or workforce retention.

An Environmental Role:

- The Site lies outside any nationally or internationally designated areas, meaning development can be facilities without displacing or impacting onto more sensitive locations elsewhere in the District.
- The proposals deliver a landscape-led scheme incorporating substantial green infrastructure, including on-site SANG provision and targeted enhancements to the River Ver corridor, improving ecology, hydrology and public access to nature.
- Opportunities for biodiversity enhancement are fully embedded, with new native planting, grassland habitats, attenuation features, and species-specific measures that together secure a meaningful Biodiversity Net Gain.
- The development promotes sustainable patterns of movement helping to reduce car dependency.
- Energy-efficient homes and modern construction standards ensure reductions in carbon emissions.

5.17. In the context of the St Albans District Local Plan (1994), the scheme responds to the Settlement Strategy by directing growth in an appropriate location without having a cumulative impact on the character or form of Redbourn. The proposals also reflect RBNP Policy RED6, by prioritising accessibility within 800m of key services, respecting local character, seeking to minimise environmental and heritage impacts, and incorporating measures to secure biodiversity net gain.

- 5.18. The proposed development represents a medium-scale housing site and aligns with Policy LG4 of the eLP, which requires that sites of this nature are masterplanned and coordinated to integrate effectively with the existing transport network and surrounding communities. The masterplanning and coordination of the scheme has been informed by a range of technical assessments, drawings and studies undertaken on behalf of the applicant as set out in Table 1, ensuring that the proposals demonstrate the key attributes outlined in Policy LG4. The proposals therefore clearly demonstrate compliance with the policy objectives for medium-scale sites, providing a deliverable and well-integrated development.
- 5.19. The proposed development also fully accords with the requirements of eLP (part B) Policy M6, which establishes the design, environmental and infrastructure parameters for the wider Redbourn allocation. The scheme has been shaped to ensure that no built development is located within Flood Zone 3b, and all residential elements are contained within Flood Zone 1. A safe and convenient network of pedestrian and cycle connections has been demonstrated, avoiding direct access from the A5183 and instead providing vehicular access from Crown Street and pedestrian and cycle routes from Waterend Lane and Harpenden Lane to integrate into the wider active travel network. The layout respects existing Tree Preservation Orders, protects the setting of the Redbourn Conservation Area, and delivers biodiversity enhancement along the River Ver through ecological buffers, riparian planting, and accessible green space through the form of a footbridge. The scheme will also contribute towards SAMMS and SANG provision to address the requirements of the Chilterns Beechwoods SAC. Finally, groundwater protection and the Site's position within Source Protection Zone 3 have informed the SuDS strategy and overall design approach.
- 5.20. In summary, the proposed development aligns with the overarching principle of development policies set out in the development framework, the eLP and the NPPF (2024). The scheme will deliver a range of benefits, principally through the provision of new market and affordable homes, contributing directly to addressing the District's critically low five-year housing land supply. In accordance with the presumption in favour of sustainable development set out in the NPPF (2024), there are no adverse impacts that would significantly and demonstrably outweigh these benefits. The development represents a sustainably located scheme that provides clear economic, social, and environmental advantages, which have significant weight in the planning balance.

#### Design Approach and Placemaking

- 5.21. The accompanying DAS sets out the design approach that has informed the development of the scheme and explains how its key design principles have been established. It provides a structured account of the design process, including an assessment of the Site's constraints and opportunities, together with an appraisal of the character of Redbourn and relevant design requirements through the development framework.
- 5.22. The DAS demonstrates how these considerations have shaped a high-quality outline proposal, ensuring that the emerging parameters respond appropriately to local context and support the creation of a well-designed development.
- 5.23. The design approach set out in the DAS and reflected in the Illustrative Layout demonstrates how a well-considered scheme can be delivered on the Site. The proposed density of 35dpha is informed by the Site's edge-of-settlement character, ensuring an appropriate transition with surrounding development. The Masterplan establishes a clear design structure, including a northern frontage characterised by terraces and semi-detached homes, creating a coherent pattern of built form.
- 5.24. Along the southern edge, the layout forms a natural crescent that will be unified through a consistent architectural approach. A small apartment building will be positioned at a key corner to provide a landmark feature with active elevations addressing both southern and eastern aspects, with terraced homes fronting Crown Street to be aligned with the existing built form. These elements demonstrate a strong placemaking strategy that integrates key design influences drawn from the Site's natural features and surrounding local context.
- 5.25. While detailed design is not a matter for approval at this outline stage, the DAS provides an indication of how the development could incorporate high-quality design detailing at the Reserved Matters stage. These elements are intended to demonstrate the scope for a locally responsive, coherent and high-quality scheme, which includes the following indicative features:
- Illustrating how building materials can draw from the local vernacular to reinforce character and cohesion, with opportunities for coordinated roof forms and colours to ensure consistency across house types and key viewpoints.
  - Demonstrating how routes along the eastern side of the watercourse could adopt a softer, more rural finish such as a looser gravel surface or reduced edging to distinguish

them from the more formalised pedestrian network elsewhere and reinforce the landscape-led approach.

- Showing how woodland areas can be reinforced through sensitive replanting. While reflecting the structure of existing tree cover, a slightly more open arrangement may allow for long-term health, realistic establishment, and improved visual permeability.

5.26. The DAS and Illustrative Layout demonstrate strong alignment with the design requirements of the adopted St Albans District Local Plan (1994). Policy 69 seeks high-quality design that responds to local context, built form, materials and scale that the proposed development achieves this through a coherent layout. Policy 70 requires well-designed housing with an appropriate mix, good access, privacy and high-quality amenity space. The proposals show how this can be delivered through a clear street hierarchy, strong natural surveillance, and accessible open space types. The Design Advice Leaflet SPD is also considered in the approach to block structure and locally referenced materials.

5.27. The development also accords with RBNP Policy RED6, as the DAS demonstrates how local distinctiveness has informed the proposals, resulting in a layout that integrates well with the villages character and current settlement pattern. These elements show that the scheme can contribute positively to Redbourn's built form and deliver a contextually responsive development at the detailed stage.

5.28. The proposals also align well with the design principles of the eLP. Policy SP12 requires high-quality, context-responsive design and efficient use of land, which is demonstrated through the DAS's landscape-led approach, and response to local character. Policies DES1 and DES5 emphasise the importance of respecting settlement pattern, scale and residential amenity; the DAS reflects this through the accessibility placemaking strategy. While Policy DES3 seeks higher densities of 40dph, the DAS shows that the proposed density represents the most effective and contextually appropriate use of the Site given its edge of settlement location, when assessed against its constraints and opportunities.

5.29. Overall, the DAS and Illustrative Layout clearly demonstrate how a well-considered, high-quality development can be delivered at the Reserved Matters stage which complement and integrate into the character of Redbourn. The proposals therefore respond appropriately to the design expectations of the Development Plan, the eLP as well as the

relevant design provisions of Section 12 of the NPPF, which emphasises the creation of well-designed places.

#### Affordable Housing and Housing Mix

- 5.30. The proposed development seeks approval for up to 35 new homes including affordable housing provision. In the absence of any adopted policy requirement regarding affordable housing as part of the adopted St Albans Local Plan (1994) the scheme has sought to use the RBNP and the eLP including its supporting evidence base. Therefore, in compliance with the eLP and RBNP policy, the Site proposes to deliver 40% affordable housing, reflecting the latest local housing needs assessment.
- 5.31. The eLP states that St Albans District faces high house prices, making affordability a significant issue for many residents, highlighting that while smaller household sizes are becoming more common, there is a notable shortage of affordable family-sized housing. In particular, medium-sized first family homes (three-bedroom) and opportunities for downsizers are needed and encouraged.
- 5.32. St Albans District has a well-documented shortfall in housing delivery, which intensifies the need for affordable homes. The persistent under delivery highlighted means that the district will continue to see a deficit in affordable housing provision over the next five years. The provision of affordable housing within this development will therefore directly contribute towards addressing this under delivery, helping to meet the pressing local need and supporting the objectives of the eLP.
- 5.33. The affordable units will be a mix of Shared Ownership/Intermediate and Affordable Rent, delivered in small clusters throughout the site to ensure full integration with market housing.
- 5.34. In respect of overall housing mix, the eLP is a clear need for small and medium sized family homes, including one and two bedroom flats, as well as two- and smaller three-bedroom houses to address local housing demand, support affordability, and ensure that new development meets the needs of a broad range of households.
- 5.35. The Illustrative Layout demonstrates a mix broadly in line with most up-to-date policy and evidence base, as set out below.

Tenure	Home Size			
	1 Bed	2 Bed	3 Bed	4 Bed
Market Housing	5%	20%	45%	30%
Affordable Ownership	20%	50%	30%	
Affordable Rent	20%	30%	45%	5 %

Table 4 - Housing mix outlined in the eLP

5.36. The proposed development aligns with the eLP policies. In accordance with Policy HOU1 the scheme will seek to provide a balanced mix of dwelling types and sizes to address both current and future housing needs as set out in Table 5. Policy HOU2 is met through the delivery of 40% affordable housing, with a tenure mix that reflects affordable rent and affordable home ownership, and home ownership, designed to be integrated with market housing. Furthermore, the development will be in line with Policy HOU4 by ensuring that all homes are designed to meet accessibility and adaptability requirements, complying with Building Regulations M4 standards.

#### Public Open Space

5.37. The proposed development provides a significant opportunity to deliver new publicly accessible open space and green infrastructure. As illustrated on the Parameters Plan and described within the DAS, the scheme will deliver a total of 2.91 ha of Green Infrastructure comprising of

- 0.30ha of amenity greenspace
- 2.37 ha of SANG provision,
- 0.24 ha of SuDS features.

5.38. This comprehensive network of multifunctional open space will enhance local recreational provision, strengthen ecological connectivity and contribute positively to the wider green

infrastructure framework within Redbourn. It will open up to the public a new part of the River Ver which is currently inaccessible.

- 5.39. In terms of open space typologies, the development will deliver a balanced mix of provision consistent with national and local standards. This includes amenity green space, natural and semi-natural greenspace, multifunctional parks and gardens, allotments, and children's area of play. Collectively, this network incorporates public open spaces, habitat areas, tree planting, footpaths and trails, SuDS features, and informal recreational areas.
- 5.40. While detailed open space requirements any layouts will be addressed at the Reserved Matters stage, the DAS provides a clear indication of how the scheme can deliver quality and well-integrated open space. This includes a proposed continuous footway along the proposed main street with multiple pedestrian connections into the adjacent public open space. The south western corner of the site has been identified as a community-focused green space incorporating flexible lawn areas, informal seating, and potential community gardens, all benefitting from natural surveillance and strong connections to the existing settlement. A children's play area, equivalent to a LEAP, is located outside the floodplain and designed in accordance with Fields in Trust standards, providing at least 400sqm of equipped space, appropriate buffer distances from homes, and convenient walking access for residents.
- 5.41. The open space standards assessment within the DAS confirms that the scheme achieves, and in all cases exceeds, the quantitative requirements anticipated by eLP Policy NEB12. This ensures the development will deliver a high-quality, multifunctional green infrastructure network of open spaces.

#### Landscape and Visual Impact

- 5.42. An LVIA has been undertaken to assess the likely landscape and visual effects of the proposed development and the Site's contribution to the wider landscape context. The assessment confirms that the Site is not subject to any national or local landscape designations, and neither the Site nor its immediate surroundings constitute a "valued landscape" in the terms set out at paragraph 187(a) of the NPPF. The Site therefore forms part of an undesignated landscape of ordinary sensitivity that has capacity to accommodate well-designed edge-of-settlement development.

- 5.43. The LVIA defines the Site as forming a logical and well-contained location for development, with the ability to be sensitively assimilated into the settlement edge of Redbourn. No notable adverse effects are anticipated on landscape designations or the underlying landscape character, nor are significant visual effects expected. While some intervisibility would occur for certain receptor groups on the eastern edge of Redbourn and within the wider landscape, these views are already influenced by existing urbanising features which create a context of partial development. As such, the baseline character of the Site and its surroundings, together with the scale and form of the proposals, would moderate the overall landscape and visual effects.
- 5.44. The LIVA is accompanied by a landscape masterplan which demonstrates how a strong green infrastructure framework will successfully assimilate the development into its surroundings. Structural landscaping comprising of native tree and shrub planting is proposed throughout the Site, including within public open spaces and along internal streets, helping to soften built form and reinforce local character.
- 5.45. The strategy incorporates multifunctional SuDS features, new hedgerows, and enhancement of the River Ver through removal of culverted sections and introduction of riparian planting. These measures collectively improve biodiversity, drainage and visual quality. New informal footpath links will also connect to the wider PRow network, while a children's play space and community garden in the south western part of the Site will provide overlooked, high-quality recreational areas.
- 5.46. The LVIA demonstrates that landscape and visual considerations do not present an in-principal constraint to the proposed development. Although some degree of change is inevitable, the site's semi-urban context, combined with a landscape-led masterplanning approach, ensures these effects can be appropriately managed and reduced over time. The landscape strategy of reinforcing existing vegetation and enhancing the River Ver corridor contributes positively to biodiversity and amenity. As such, the proposals represent an environmentally responsible and sensitive form of development in landscape and visual terms.

#### Green Belt

- 5.47. The LVIA includes a consideration of the Site's contribution to the Green Belt, in which it is currently located. This includes a review of the Council's assessments undertaken as part of its Development Plan evidence base. As detailed in the assessment:

- The Site makes a weak or no contribution to Purpose A to “check the unrestricted sprawl of large built-up areas”;
- The Site makes no contribution to Purpose B to “prevent neighbouring towns from merging into one another”;
- The Site makes no contribution to Purpose D to “preserved the setting and special character of historic towns”

5.48. The conclusions are supported by the Council’s Evidence Base within the St Albans Green Belt Review: Purposes Assessment (2013) and the St Albans Green Belt Review (2023) identifying that the Site, performs weakly against the Green Belt purposes and is considered less important in terms of its contribution to the wider Green Belt. The site represents less than 0.03% of the District’s overall Metropolitan Green Belt and its release would therefore not undermine the strategic integrity or continuity of the Green Belt within St Albans.

5.49. The site therefore makes a limited or no contribution to the Green Belt purposes and development is unlikely to lead to wider Green Belt harms.

5.50. The LVIA undertakes a Grey Belt assessment setting out consideration of the site against the definition of grey belt contained within Annex 2 of the NPPF (2024). This highlights that the proposals meet the relevant landscape-related tests of Grey Belt:

- The site is not considered to constitute or contain assets listed in footnote 7;
- The site is not considered to contribute strongly to purposes A, B or D (as above);
- The proposed development would not have a negative effect on the overall function and openness of the wider Green Belt;
- The proposal would result in significant provision of accessible open spaces.

5.51. However, the proposed development does not meet the Golden Rule relating to affordable housing provision (which would in the case equate to 50% provision). Instead, it seeks to deliver a policy compliant 40% provision, in line with the eLP and its supporting Evidence Base.

5.52. Whilst it is material that the Site would meet all but one part of the Grey Belt tests, it nevertheless remains inappropriate development in the Green Belt in this instance. In accordance with the NPPF development should only be approved in very special circumstances.

5.53. It is therefore considered clear very special circumstances exist in this instance to allow the proposed development. This exists as a combination of the benefits arising from the scheme, against the harms which as identified throughout this Statement and in other submission documents is limited. These benefits include:

- Support from the eLP and its Evidence Base including a draft allocation which the site forms part of, including its release from the Green Belt;
- The site does not form an important component of the Green Belt and performs poorly against the identified purposes;
- The site and proposals satisfying the majority of the grey belt tests;
- The provision of housing when considered in the context of the Council's significant housing land supply shortfall and poor housing delivery test results;
- The delivery of affordable housing considered in the context of the persistent affordability issues experienced across the District and the limited delivery of affordable housing in recent years;
- A significant provision of new public open space throughout the site including delivery of a SANG;
- Enhanced connectivity through the site connecting key pedestrian and cycle routes;
- Opening up of the River Ver to the public in an otherwise inaccessible location;
- Remediation of contaminated land to enable a safe and viable development in addition to protecting ground and watercourses.

5.54. Taking all factors into account, it is considered that the proposals would amount to very special circumstances in the context of the Green Belt. It represents a sustainable and proportionate form of development that would deliver substantial local benefits without

undermining the purposes or function of the wider Metropolitan Green Belt and therefore would not conflict with adopted St Albans Local Plan (1994) Policy 1 The Metropolitan Green Belt and eLP policy SP3.

#### Transport and Access

- 5.55. The accompanying Transport Statement (“TS”) considers the Site’s accessibility to existing modes of sustainable transport, details the proposed access arrangement, and assesses the traffic conditions post completion of the development and parking provision.
- 5.56. The Site is located on the eastern edge of Redbourn, a village with a range of local services and facilities. The TS confirms that the Site is within reasonable walking and cycling distance of amenities including healthcare, shops, a post office, and early years education, most located along High Street, less than 1 kilometre away. In addition, nearby towns such as Harpenden, Hemel Hempstead, St Albans, and Luton provide access to a wider range of services, employment, and leisure opportunities. Good bus connections and a network of cycle routes further link the Site to surrounding areas, demonstrating its ability to support sustainable travel and reduce reliance on the private car.
- 5.57. The TS outlines how vehicular access to the proposed development will be provided via a new priority-controlled T-junction with Crown Street, located at the southwestern corner of the Site. This junction will serve as the principal access for vehicles, pedestrians, and cyclists. The design has been prepared in accordance with Hertfordshire County Council’s Place & Movement Planning and Design Guidance, ensuring compliance with local residential development standards. Pre-application discussions with the Highway Authority have confirmed that the proposed access is suitable for the anticipated traffic levels and will provide safe and suitable access for all users.
- 5.58. The TS traffic impact assessment forecasts that the proposed development would generate approximately 23 two-way trips during the AM peak and 20 two-way trips during the PM peak, representing a modest increase in traffic. Junction capacity assessments indicate that the Harpenden Lane/Crown Street and Harpenden Lane/Ver Road junctions will continue to operate well within capacity under all scenarios. No mitigation measures are required and the development would not materially affect the operation or safety of the local highway network.

- 5.59. The proposed development accords with the St Albans Local Plan 1994 (policies 34, 36a and 39) by demonstrating that it can be safely and appropriately accessed from Crown Street, with the TS confirming no adverse effects on road safety or network capacity. The Site is located in a sustainable location with good access to public transport, walking and cycling routes, and a range of village services. Parking has been designed to meet recognised up to date standards while respecting layout, character, and secure movement through the Site.
- 5.60. The scheme supports the RBNP's objectives for sustainable and active travel by delivering safe, direct walking and cycling connections throughout the Site and linking to the existing village network. Overall, the proposals integrate well with local travel opportunities and reduce car dependency, aligning with the aspirations of the Neighbourhood Plan.
- 5.61. Furthermore, the proposed development aligns with the eLP transport objectives by prioritising sustainable travel through its accessible location, walking and cycling connections, and proximity to public transport. The TS demonstrates that the Site can be safely accessed by all users and that the modest traffic generated can be accommodated without impacts on the surrounding network. Parking and cycle provision have been designed in accordance with the emerging standards, reflecting the Site's accessibility while supporting reduced car dependency. Overall, the scheme responds positively to the transport hierarchy, access requirements, and parking principles set out in the eLP.

#### Flood Risk and Drainage

- 5.62. The accompanying Flood Risk Assessment and Drainage Strategy ("FRA") has been prepared in support of the proposed development. This identifies that part of the Site falls within Flood Zones 2 and 3 and there are potential risks associated with surface water flood risk potentially affecting the site.
- 5.63. To provide a site-specific understanding of this risk, WSP has undertaken detailed hydraulic modelling using and updating the Environment Agency's existing River Ver model. This work provides a refined flood outline for a range of storm events, including an allowance for future climate change. The updated modelling confirms that the vast majority of the site remains at a very low probability of flooding, with only isolated areas close to the river potentially affected during more extreme events.

- 5.64. The FRA sets out how the findings of the hydraulic modelling have directly informed the Illustrative Layout and the Parameter Plan, ensuring that development is directed away from areas of higher fluvial risk. A sequential approach has been applied throughout, meaning all built development is located outside the predicted peak flood extents for every modelled event. This ensures that the layout works with the Site's natural water environment and avoids areas where flooding could occur.
- 5.65. In respect of surface water flooding, WSP have again prepared a direct-rainfall hydraulic model. This provides a refined assessment of potential flood depths under a range of storm events, including climate change allowances. The modelling confirms that the majority of the Site remains outside predicted flood extents for all events tested, with a very low probability of flooding, while only the northern flow-path corridor and the lowest part of the southwest exhibit higher surface water risk. Importantly, the modelling also shows that safe access and egress can be maintained via the proposed Crown Street access during all modelled scenarios.
- 5.66. Surface water assessment has informed the layout ensuring buildings are directed away from areas at higher risk of flooding and that appropriate management measures can be incorporated. A sequential approach has again been applied across the Parameter Plan and Illustrative Masterplan, ensuring that all built development is located outside the predicted peak surface water flood areas.
- 5.67. The FRA demonstrates that the proposed development has been carefully designed to minimise flood risk from all sources, including fluvial, surface water, and groundwater. Built development is to be directed away from higher-risk areas, with flow paths and low-lying land utilised for greenspace provision with surface water managed through a sustainable drainage strategy. These measures ensure that the Site can be developed safely while maintaining resilience to current and future flood events.
- 5.68. The FRA outlines a preliminary surface water drainage strategy that ensures sufficient space is set aside within the layout to manage runoff appropriately, with full details to be confirmed at the reserved matters stage. In line with national guidance, surface water from the development will be managed following the drainage hierarchy, with discharge directed to the River Ver at rates that do not exceed existing greenfield runoff levels. This approach ensures that the development will not increase flood risk elsewhere, with both peak flow rates and total runoff volumes controlled to national SuDS standards. The strategy

therefore demonstrates that surface water from the proposed development can be sustainably and safely managed, with detailed design to follow.

- 5.69. The drainage strategy incorporates a range of SuDs features to ensure runoff from the development is managed sustainably and does not exceed greenfield discharge rates. Preliminary calculations from the FRA indicate that the development will require on-site attenuation, which can be accommodated through two attenuation basins located outside areas of fluvial flood risk. These features will store surface water during heavy rainfall events and release it at controlled rates to the River Ver via appropriate flow-control devices.
- 5.70. The basins also provide opportunities for landscaping, biodiversity enhancements, and amenity benefits. As the design progresses, additional source-control SuDs such as permeable paving, swales or similar can be incorporated to further support water quality improvements and deliver a more resilient drainage network. Full SuDS design will be developed at the reserved matters stage, ensuring compliance with national SuDS standards.
- 5.71. The proposed development has been designed to ensure that all built elements are located within the lowest-risk parts of the Site, avoiding areas subject to fluvial flooding and maintaining an appropriate buffer to the River Ver. The submitted FRA confirms that the scheme will not increase flood risk elsewhere with on-site SuDS features ensuring that exceedance flows remain contained within controlled routes. Through these measures, the development responds positively to the local flood risk context and meets the expectations for safe, stable and well-designed water management set by Policy 84 of the St Albans Plan (1994).
- 5.72. The drainage strategy has also been developed in line with national policy, ensuring that flood risk is not increased elsewhere, and that the development remains safe for its lifetime, as required by NPPF Section 14. Surface water is managed through a SuDS-led approach that achieves greenfield runoff rates, incorporates climate-change allowances, and provides sufficient on-site attenuation to accommodate extreme storm events. Attenuation basins are located outside the fluvial floodplain, and opportunities for additional source-control and water-quality enhancements are embedded within the wider green infrastructure which accords with eLP Policy NEB8.

5.73. Flood risk has been a major focus of the eLP examination, particularly regarding surface water flow paths and the ability of sites to achieve safe access. As part of the ongoing Examination In Public (EiP) the Council's evidence, supported by the Lead Local Flood Authority (LLFA) and Environment Agency, has been found to be robust and no concerns have been raised in relation to the Sites draft allocation. ELP Policy M6 sets clear flood-related parameters, and the proposals fully comply with these requirements. The absence of any objections during the EiP provides strong confirmation that the site remains an appropriate and deliverable location where flood risk can be safely managed.

#### Foul Drainage

5.74. WSP have prepared a Foul Water Statement ("FWS") confirming that Thames Water ("TW") is the statutory sewerage undertaker for the site and that the existing foul sewer network crosses the site.

5.75. TW has verified that foul flows from up to 35 dwellings can be accommodated at the identified point of connection, subject to detailed design at the reserved matters stage. No pumping station is expected to be necessary.

5.76. Based on the FWS, a foul water drainage strategy can be delivered that connects to the existing TW network without creating capacity issues or operational risks. No foul water or utilities constraints have been identified that would prevent planning permission from being granted.

#### Ecology

5.77. A comprehensive Ecological Assessment ("EA") has been prepared by EDP to support the Site. This includes a full desk study and a suite of detailed field surveys covering habitats, river condition, breeding birds, bats, dormice, otter, badger, water vole and reptiles. Together, these baseline surveys provide a robust understanding of the site's ecological value and ensure that the proposed development has been informed by up-to-date and proportionate ecological evidence.

5.78. No part of the Site is covered by any statutory ecological designations. The closest internationally designated site, the Chiltern Beechwoods Special Area of Conservation ("SAC"), lies approximately 11 km to the west and falls within the established recreational

zone of influence. No nationally or county-important designations are present within 2 km of the Site.

- 5.79. The River Ver is an ecologically important watercourse that runs through the site, valued for its clear, spring-fed waters and associated biodiversity. The EA acknowledges that while the river has been affected by historic abstraction, channel modification, and shading, it remains a significant ecological and landscape feature within the site. Its presence provides an opportunity to enhance local habitat quality and strengthen green infrastructure through restoration, buffer planting, and integration with sustainable surface water management.
- 5.80. The habitats on the Site largely comprise existing woodland, scrub, grassland, and hedgerows of moderate ecological value. These provide opportunities to maintain and enhance connectivity for species across the Site and with the wider landscape. Tables 3.3 and 3.4 of the EA provide a full summary of species, habitats, and their ecological importance.
- 5.81. The EA sets out how the proposed development incorporates a range of ecological mitigation measures, both embedded within the design and additional measures to avoid, reduce, or compensate for potential impacts on both habitats and species. The illustrative layout reflects these measures.
- 5.82. A Shadow Habitat Regulation Assessment (“sHRA”) has been prepared which assesses the potential for ‘Likely Significant Effects’ on European sites arising from the proposed development. These have been ruled out for all sites except the Chiltern Beechwoods SAC, where possible impacts from increased recreational use and changes in air quality have been identified in the absence of mitigation.
- 5.83. The assessment demonstrates that any adverse effects on the integrity of the Chiltern Beechwoods SAC can be avoided through the delivery of mitigation measures, including the provision of on-site SANG and SAMM contribution. On this basis, the assessment concludes that, with mitigation in place, the proposed development will not have an adverse effect on the integrity of any European site.
- 5.84. The EA therefore demonstrates that the proposed development is in compliance with the St Albans District Local Plan (1994) and the RBNP by taking ecological considerations into account throughout the design process. The development layout incorporates appropriate

buffers, habitat creation, and on-site SANG provision. The proposals have also been informed by the need for a Habitats Regulations Assessment due to the proximity of the Chiltern Beechwoods SAC. Overall, the design and siting of the development reflect a clear commitment to protecting and enhancing ecological features in line with the objectives of Policy 106 and RBNP Policy 6.

- 5.85. In terms of the eLP, the development aligns with Policy SP10 by protecting and enhancing the natural environment and supporting biodiversity and green infrastructure. Mitigation measures, including the provision of on-site SANG and contributions to a SAMM scheme, directly address potential recreational impacts on the Chiltern Beechwoods SAC.

#### Biodiversity Net Gain

- 5.86. EDP have prepared an assessment of Biodiversity Net Gain for the Site in accordance with the Environment Act 2021. Overall, the development is not expected to achieve a net gain of over 10% for habitat units on site, and therefore, in line with current national and local planning policy requirements, the units will be provided offsite.

- 5.87. The assessment, included as Appendix 5 of the EA, has been carried out using the statutory metric and considers the proposed habitat creation, enhancement, and mitigation measures across the site. Whilst not achieving 10% habitat unit gain on-site there will still be potential for enhancements to the site's ecological value. Overall, the proposals ensure compliance with eLP policy SP2 and RBNP policy RED 4.

#### Air Quality and Noise

- 5.88. The applicant has commissioned Noise and Air Quality assessments to demonstrate that, through features such as design, layout, and operational factors, the development will minimise potential noise and air pollution impacts. This is with mitigation measures embedded where necessary to protect the health, amenity, and environmental quality for both future residents of the proposed development and its surroundings.

- 5.89. The accompanying Noise Assessment (NA) identifies the A5183 as the primary source of noise affecting the site, with baseline levels monitored through detailed surveys. The assessment confirms that overall noise levels across the site are low, with a negligible noise risk during both daytime and night-time periods. This means that external amenity areas such as private gardens and shared open spaces will fall comfortably within recognised

thresholds for residential use. The assessment also confirms that the proposed development would not materially elevate local traffic noise.

- 5.90. As demonstrated through the Illustrative Layout the site further mitigates potential noise effects by positioning-built form and landscaped buffers along the eastern boundary, increasing separation from the A5183.
- 5.91. The accompanying Air Quality Assessment (AQA) confirms that the site is located outside the St Albans AQMA and currently experiences NO<sub>2</sub> concentrations well below the air quality objectives. The AQA also screened the operational traffic associated with up to 35 dwellings and found this to fall below the threshold requiring detailed NO<sub>2</sub> modelling, meaning the development is not expected to generate any significant change in roadside NO<sub>2</sub> concentrations. The site therefore represents a low-risk location for sensitive receptors in NO<sub>2</sub> terms.
- 5.92. The AQA identified a medium risk of dust soiling and a low risk to human health from PM<sub>10</sub> during construction. However, with appropriate construction-phase mitigation the residual effects are predicted to be insignificant. Emissions from construction traffic were also considered to also be negligible and not at a level that would influence particulate concentrations, meaning that background PM<sub>10</sub> and PM<sub>2.5</sub> levels would remain comfortably below national Air Quality Standards.
- 5.93. The findings of both the NA and AQA confirm that the proposed development does not have any residual noise or air quality impacts. The assessments were undertaken at the earliest stage of design and demonstrate that the site will not expose future occupants to unacceptable levels of noise or air pollution. Where temporary construction-phase risks were identified, proportionate mitigation can be established. The scheme's layout, reliance on green infrastructure, retention of separation from the A5183, and incorporation of ventilation strategies where required all contribute to ensuring the site aligns with the requirements of eLP Policy HW1.

#### Heritage and Archaeology

- 5.94. The applicants have commissioned a heritage impact and archaeological assessment ("HIA") to assess whether the proposed development would give rise to any harm of both designated and non-designated heritage assets, their settings, and any potential for below-ground archaeology.

- 5.95. The HIA confirms that there are no designated heritage assets, Conservation Areas, Listed Buildings or Scheduled Monuments that would experience any change to the attributes that contribute to their significance. Furthermore, the HIA concludes that the Site does not contribute to the setting of any designated heritage asset and would not result in any harm to their significance. The nearest heritage assets (being the listed buildings on Redbourn High Street and Redbourn Conservation area) are spatially and visually separated from the Site by intervening development, vegetation and topography, ensuring no meaningful intervisibility or functional association.
- 5.96. The HIA and supporting geophysical survey also assesses the Site as having low archaeological potential, reflecting its historic land use as enclosed agricultural fields with no recorded heritage features or indicators of past activity of significance. It concludes that any archaeological interest can be appropriately managed through standard planning controls where necessary.
- 5.97. Accordingly, the proposed development complies with paragraph 207 of the NPPF and with the emerging Plan's strategic objectives for heritage protection, including Policy SP11. The supporting HIA demonstrates that the proposals would result in no harm to designated or non-designated heritage assets or their setting, and any archaeological findings can be addressed proportionately.

#### Ground Conditions / Contamination

- 5.98. A phase 1 and phase 2 Contamination Investigation Report ("CIR") has been produced for the site by ST consult. The CIR confirms that the southern part of the site, which has remained in agricultural use, presents a very low contamination risk. In contrast, the northern section which has been previously occupied by light commercial structures and areas of made ground presents a moderate risk, with localised contamination identified. This includes concentrations of arsenic, lead, alongside isolated fragments of suspected asbestos-containing material associated with historic demolition rubble.
- 5.99. To support the proposed development a Remediation Strategy has been prepared by ST consult for the northern part of the site, where made ground and localised contaminants were identified. The strategy includes the careful handpicking and licensed disposal of surface asbestos, the provision of clean cover in private gardens and selected areas of public open space, and appropriate mitigation measures to address elevated concentrations of lead and Polycyclic Aromatic Hydrocarbons. These works will be carried

out in accordance with best-practice health and safety procedures. The proposed remediation ensures that the affected areas can be safely brought into residential use and that any risks to future occupants, construction workers, or the wider environment are fully managed and mitigated.

### Utilities

5.100. A Utilities assessment has been undertaken by UCML that confirms that the proposed development can be adequately supported by existing utility infrastructure. Water, Power and telecoms Networks have verified that existing networks have sufficient capacity to meet the development's projected demand, subject to some minor enabling works.

5.101. The proposed development therefore fully accords with SP9 by ensuring early consideration of utilities capacity and constraints, supported by UCML's assessment. The scheme benefits from confirmed capacity in both the water and electricity networks and incorporates necessary planning for minor reconfiguration works, demonstrating effective early provision. Any enabling works will be undertaken before occupation in accordance with appropriate conditions.

### Planning Obligations

5.102. The application proposes the provision of affordable dwellings, which can be secured through a Section 106 agreement between the applicant and the Council.

5.103. Further, the Section 106 agreement would address required contributions towards the Council's identified mitigation (SAMMs) addressing recreational disturbance at the Chiltern Beechwoods SAC, and any relevant obligations relating to the proposed on-site SANG.

5.104. There may be further requests for contributions towards the provision of physical and social infrastructure. These will be assessed through the application process to understand if they are necessary to make the proposed development acceptable and therefore substantiated and justified in the context of the NPPF (2024) and Regulation 122 and 123 of the Community Infrastructure Levy Regulations 2010 (as amended).

5.105. The actual sums, triggers and precise wording is to be agreed prior to determination of the application.

## 6. SECTION 6 - PLANNING BALANCE

- 6.1. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the proposed development must be assessed against the Development Plan unless material considerations indicate otherwise.
- 6.2. Given the Council's critically low 0.83-year housing land supply, poor HDT performance, and the age of the adopted Development Plan, the relevant policies are considered out-of-date for the purposes of paragraph 11(d) of the NPPF (2024). The tilted balance is therefore engaged. The presumption in favour of sustainable development therefore applies and, in accordance with Para 11 d) permission should be granted unless there are designations which strongly suggest permission should be refused or the adverse impacts would significantly and demonstrably outweigh the benefits.
- 6.3. The NPPF (2024) states that inappropriate development should not be approved except in very special circumstances. 'Very Special Circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 6.4. The site lies within the Metropolitan Green Belt, however as confirmed by the LVIA, makes only a 'weak' contribution to Green Belt purposes and represents just 0.029% of the District's Green Belt which can be considered as negligible in spatial terms. The scheme meets the majority of the NPPF (2024) Green Belt tests although it does not meet the notional 50% affordable housing "Golden Rule." It is however considered that the proposed 40% affordable housing is fully compliant with the eLP and delivers a significant contribution in the context of local need. Whilst the harm to the Green Belt is limited, the NPPF (2024) directs this be given substantial weight.
- 6.5. For the reasons as set out in this Planning Statement and the submitted technical documentation, the site is not materially constrained, and any proposed impacts or harms can be appropriately mitigated or compensated. The 'other harms' are therefore minimal.
- 6.6. Furthermore, whilst the Site demonstrates limited conflict with certain policies of the adopted St Albans Local Plan (1994) particularly Metropolitan Green Belt Policy 1, Settlement Strategy Policy 2, and RBNP Policy RED6, the weight attributed to these policies is considered to be limited given the District's acute housing delivery shortfall.

- 6.7. Conversely, there are significant benefits being delivered by the proposed development.
- 6.8. The development will make a substantial contribution to meeting local housing needs through the delivery of up to 35 new homes, including 40% affordable housing. The scheme also delivers a high-quality network of open spaces which will support health, wellbeing and recreational opportunities for both existing and future residents. Improved pedestrian and cycle connections will strengthen links to local services promoting inclusive, accessible movement throughout the settlement. Social sustainability should therefore carry significant weight
- 6.9. The proposal will generate direct and indirect economic benefits through construction investment and increased local expenditure. New households will support local businesses and community facilities within Redbourn, helping to sustain the vitality of the village centre. Economic sustainability should therefore carry significant weight
- 6.10. The development follows a landscape-led approach that enhances the River Ver corridor, delivers extensive new green infrastructure and increases ecological connectivity across the site. Biodiversity gains will be achieved through native planting, riparian enhancements, habitat creation and delivery of SANG, ensuring a significant uplift in environmental value. The remediation of contaminated land within the northern part of the site provides further environmental benefit, improving soil and water quality and returning previously degraded land to productive use. Environmental sustainability should therefore carry significant weight
- 6.11. Furthermore, Furthermore, although the Site forms part of the wider draft Policy M6 allocation in the eLP, its delivery as a standalone phase represents a logical and beneficial early contribution toward meeting the District's acute housing needs. The Council has already identified this land as suitable, available and achievable for residential development, and its advanced inclusion in the eLP means that, in accordance with paragraph 49 of the NPPF (2024), appropriate weight can now be afforded to the draft allocation in decision-making. Bringing this parcel forward now would make a meaningful and immediate contribution to housing supply. Where the opportunity arises, the applicants are committed to working constructively with adjoining landowners to ensure that the remainder of Policy M6 can be delivered as a comprehensive, well-planned strategic allocation. Indicative links have been shown to / from neighbouring parcels for pedestrians and/or cyclists on the submitted Parameter Plan and Illustrative Layout Plan.

Early release of this parcel therefore complements the wider strategic vision for Redbourn and should be afforded positive weight in the planning balance vision for Redbourn and should be afforded positive weight in the planning balance.

6.12. In summary, the limited Green Belt harm, when balanced against the substantial housing, social, economic and environmental benefits, coupled together with the eLP proposed allocation for the Site and supporting evidence base, clearly amounts to 'Very Special Circumstances' to allow the proposed development in the Green Belt.

6.13. The proposal represents sustainable development in line with national policy and is strongly supported by the eLP. The adverse impacts do not significantly or demonstrably outweigh the benefits, and therefore, in accordance with paragraph 11(d) of the NPPF, the application should be approved without delay.

## 7. SECTION 7 – CONCLUSION

- 7.1. This Planning Statement has been prepared on behalf of Martin Grant Homes and Kearns Land in support of an outline planning application for up to 35 dwellings at land south of Harpenden Lane, Redbourn. All matters are reserved except for access.
- 7.2. Redbourn is identified as a Large Village within the settlement hierarchy and is recognised as a highly sustainable location, benefitting from a good range of services, employment opportunities, education and public transport connections. The settlement is suitable for accommodating proportionate residential growth.
- 7.3. St Albans District cannot demonstrate a five-year housing land supply, with the latest published figure at 0.83 years. As a result, relevant development plan policies relating to the supply of housing are out of date, and the tilted balance under NPPF paragraph 11(d) is engaged.
- 7.4. The Site is also identified as part of the Policy M6 strategic allocation in the eLP. The proposed scheme aligns with all relevant design, environmental and technical requirements set out under Policy M6. Given the advanced stage of the eLP, paragraph 49 of the NPPF confirms it can be afforded significant weight.
- 7.5. The supporting technical assessments demonstrate that there are no constraints preventing development. Any limited impacts can be satisfactorily mitigated through design, layout, landscaping, sustainable drainage measures, or planning obligations.
- 7.6. The proposals will deliver a range of social, economic, and environmental benefits. These include much needed market and affordable housing, significant areas of green infrastructure, SANG, new pedestrian and cycle connections, biodiversity enhancements, support for local services, and energy-efficient homes.
- 7.7. When assessed as a whole, the limited adverse impacts do not significantly or demonstrably outweigh the clear benefits of the scheme. In line with NPPF paragraph 11(d), the tilted balance strongly supports approval. The development represents sustainable growth in a suitable location and accords with both national policy and the direction of the eLP. Planning permission should therefore be granted.

## 8. APPENDIX 1 – SITE LOCATION PLAN



- Site Boundary (3.80ha)
- Other Land in the Control of the Applicant

 the environmental dimension partnership <small>Registered office: 01285 740427 - www.edp-uk.co.uk - info@edp-uk.co.uk</small>	date drawing number scale drawn by checked QA	07 OCTOBER 2025 edp2974_d010e 1:2,000@A3 NBo CGr	client <b>Martin Grant Homes &amp; Kearns Land</b> project title <b>Land South of Harpenden Lane, Redbourn</b> drawing title <b>Site Boundary Plan</b>
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## 9. APPENDIX 2 – PARAMETER PLAN



## 10. APPENDIX 3 – ILLUSTRATIVE MASTERPLAN





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