

Hemel Garden Communities

12. Policy LG2 refers to the Hemel Garden Communities programme, which will deliver 4,300 new homes by 2041 and 5,500 homes by 2050 through a network of new garden communities to the northeast and east of Hemel Hempstead.
13. The Hemel Garden Communities Evidence Paper (Submission Document HGC 01.01) refers to continued ongoing work to progress and support the delivery of transport interventions, with a focus on key network priorities. Paragraph 5.3 also refers to ongoing work in relation to the Hemel Garden Communities Infrastructure Delivery Plan ('IDP'), noting that this will develop a cost apportionment and cost sharing methodology.

**Question 15 – What is the latest position with ongoing highways and infrastructure evidence? What work is ongoing and when is this likely to be completed?**

- 15.1. Hemel Garden Communities (HGC) is a longstanding project that has been in development since 2015 and has a well-developed evidence base which supports the allocation in the draft Local Plan. This includes evidence supplied in response to these questions, including the appendices. The Council considers that the latest position is that there is sufficient highways and infrastructure evidence to support the Plan, its Policies and its allocations today.
- 15.2. The main outstanding issue regarding the evidence base was raised by National Highways in their response to the Regulation 19 consultation, and that is addressed below and in response to Initial Questions 2 and 3.
- 15.3. The evidence was largely set out in section 4 of the Hemel Garden Communities Evidence Paper (Examination Library HGC 01.01), which included:
  - HGC Indicative Concept Plan (2024) (HGC 04.01)
  - HGC Framework Plan Story Document (HGC 04.02)
  - HGC Framework Plan Technical Evidence Report (2024) (HGC 04.03)
  - HGC Framework Plan Technical Evidence Appendices (2024) (HGC 04.04)
  - HGC Delivery Statement - update (Nov 2024) (HGC 02.01)
  - HGC 2050 Transport Vision & Strategy Executive Summary (2024) (HGC 05.01)
  - HGC 2050 Transport Vision & Strategy (2024) (HGC 05.02)
  - HGC Potential Modal Shift Executive Summary (2023) (HGC 05.04)
  - HGC Potential Modal Shift (2023) (HGC 05.03)
  - Heritage Impact Assessment Appendix 1 Hemel Garden Communities (2024) (EDH 04.02)

- Hemel Hempstead Historic Study Report (2023) (HGC 06.02)
- North Hemel Landscape Study Main Report (2024) (HGC 07.02)
- Hemel Strategic Design Code Draft (2024) (HGC 06.01)
- Green Infrastructure Strategy Final Draft (2024) (HGC 07.01)
- Socio-economic and Demography Study (2024) (HGC 08.01)
- Higher Education and Research Opportunities (2024) (HGC 08.02)
- Heritage Impact Assessment Appendix 1 Hemel Garden Communities (2024) (EDH 04.02)

15.4. Further evidence that directly supports the allocation of HGC in the Plan and the policies includes:

- SADC Local Plan Infrastructure Development Plan (IDP) (2024) (INF 01.01);
- Appendix A1 SADC Infrastructure Schedule (2024) INF 01.02);
- St Albans Modal Shift Study (2024) (INF 09.12);
- Transport Impact Assessment COMET St Albans LP Modelling Report (2024) (INF 09.11);
- St Albans District Council Local Plan Viability Assessment (2024) (INF 10.01), prepared by BNP Paribas;
- East Hemel (Central) Site Viability Report (2024) (INF 10.02);
- East Hemel (North) Strategic Site Viability Report (2024) (INF 10.03);
- East Hemel (South) Strategic Site Viability Report (2024) (INF 10.04);
- North Hemel Hempstead Strategic Site Viability Report (2024) (INF 10.09);
- St Albans District LCWIP Final Report (2023) (INF 07.02)
- St Albans Local Plan Sustainability Appraisal Report (2024) (LPCD 03.02)

15.3 A further relevant document is the Hemel Hempstead Sustainable Transport Study (2024) which was prepared by Dacorum Borough Council (DBC) and was published in Autumn 2024 alongside the DBC Regulation 19. This is attached as Appendix 15.1.

15.4 It should be noted that SADC's draft Local Plan policies regarding HGC (Policies LG2 and LG3) were developed jointly between SADC and DBC, with the input of the Hemel Garden Communities team including HCC, although progress of the SADC draft Local Plan is not dependent upon that of DBC. DBC intend to submit their Local Plan to the Planning Inspectorate on 11 March 2025.

15.5 All of the ongoing evidence work is to supplement, take forward and assist the Inspectors and key consultees. Since the SADC Local Plan Submission (Regulation

22) on 29th November 2024, transport and infrastructure work has continued to progress.

- 15.6 The main outstanding issue regarding the evidence base was raised by National Highways in their response to the Regulation 19 consultation that stated “...*insufficient evidence to demonstrate that the Local Plan growth can be accommodated in transport terms on the SRN. Further evidence will be required to demonstrate that the Local Plan is sufficiently robust on transport grounds.*” The response to the Initial Questions 2 and 3 sets out the detail of the ongoing engagement and work that is underway to resolve this issue.
- 15.7 Since the Regulation 19, SADC and HCC have explained further what had been done for the SADC COMET (Countywide Model of Transport) Local Plan Regulation 19 run. National Highways have also confirmed their acceptance of the calibration and validation of the COMET model generally and with specific regard to the M1 and the M25. This work was supplied to National Highways originally in July 2024 and with the Local Plan Reg 19 Publication in September 2024 and their acceptance of this work now has successfully resolved a substantial proportion of the concerns raised by National Highways at the Regulation 19 stage. Some further work to explain in more detail to National Highways the impacts on the SRN in relation to technical details regarding merge and diverge impacts is ongoing and currently anticipated to be resolved by the end of May 2025.
- 15.8 In addition, the primary ongoing piece of work is the joint SADC and DBC COMET model run to 2041. Since the Regulation 19 Publication, a Joint COMET Model test, combining the growth of the SADC and DBC Local Plans to 2041 was run and is being reported. The COMET Joint SADC and DBC model draft report has been received from the consultants WSP. Further work is underway including ongoing engagement with National Highways, and sensitivity testing to identify timings for Project Breakspear Phase 3 of the M1 Junction 8 enhancements (M1 J8 Overbridge). Outputs from the COMET Joint SADC and DBC including sensitivity testing are anticipated by the end of May 2025.
- 15.9 Completion of further evidence work is not considered necessary at this stage to demonstrate the deliverability of HGC as part of SADC’s draft Local Plan. In order to satisfy the requirements of National Highways in relation to their Regulation 19 comments, the joint SADC and DBC Local Plans growth COMET modelling work (to 2041) is currently underway and for which the initial draft output has already been completed, The other ongoing evidence work considers the development of HGC beyond the Plan Period of 2041, extending out to 2050, and is progressing as follows:
- **Hemel Garden Communities Infrastructure Delivery Plan (HGC IDP) to 2050**  
- The HGC IDP to 2050, will bring together the existing evidence the SADC Local Plan IDP (INF 01.01; INF 01.02) and the DBC Local Plan IDP (Regulation 19 version (2024) and Submission Regulation 22 version (11 March 2025)) to produce a combined HGC IDP and Infrastructure schedule for the whole HGC Garden Town Programme Area (HGC Growth Areas, including SADC site

allocations H1-H4 and wider Hemel Hempstead growth in the Dacorum Borough).

- Arup, who produced both the SADC IDP (2024) and DBC IDP (2024 and 2025), are carrying out the work. Work commenced on the HGC IDP in October 2024, with anticipated completion by the end of April 2025.
  - The HGC IDP will include infrastructure mitigation requirements, as well as the infrastructure required beyond the Local Plans IDPs plan period, to 2050. The HGC IDP will include any updated outputs from the Aecom Hemel Hempstead Transport Study work; and the emerging DBC Local Cycling Walking Infrastructure Plan (LCWIP) schemes (Public Consultation, February 2025).
  - The HGC IDP to 2050, will develop a cost apportionment and cost sharing methodology, based on similar methodology utilised at Harlow & Gilston Garden Town. Discussions are progressing with DBC, HCC and Developers to establish a consistent approach to apportioning infrastructure costs across sites to ensure that developers contribute in a fair and equitable way to the infrastructure required to support the delivery of the Garden Town, in line with the HGC Spatial Vision.
  - Stakeholder engagement on the HGC 2050 IDP Infrastructure Schedule is being carried out in February / March 2025. This includes with infrastructure providers, stakeholders, and other relevant consultants such as Aecom (for the Hemel Hempstead Transport Study), to ensure the work is aligned.
  - The next HGC Developer forum is scheduled for 3 April 2025. It will cover updates to the HGC 2050 IDP and schedule and landowners will be invited to provide their feedback on the schemes included, as well as the method of apportioning costs of infrastructure schemes.
- **Joint SADC and DBC COMET model run to 2050** - Supplementary additional work for beyond the Plan period, is underway to develop a 2050 version of the COMET model and to test the full HGC programme buildout for the SADC and DBC growth to 2050. This will include a Vision and Validate test, which builds on the existing modal share shift evidence that has been carried out (HGC 05.03 and INF 09.12), to assess the operation of the transport network. The validation will assess the 60% sustainable mode share is achieved within the growth areas (with 40% elsewhere in Hemel Hempstead), as well as a test the infrastructure identified to support the wider growth beyond the plan period to 2050, from the AECOM Hemel Hempstead Transport Study update. Results from this exercise are expected at the end of May 2025.

15.10 In summary, the latest position regarding highways and infrastructure work, is outlined in Table 15.1 below:

**Table 15.1 Summary table of latest position with ongoing highways and infrastructure evidence**

<b>Work</b>	<b>Category</b>	<b>Status and Timing</b>
National Highways acceptance of the calibration and validation of the COMET Model	Transport	Complete – February 2025
National Highways acceptance of the outputs of the SADC Local Plan Regulation 19	Transport	Complete – February 2025
Joint SADC and DBC COMET model run to 2041	Transport	Ongoing – Initial draft outputs received - End of May
Joint SADC and DBC COMET model run to 2050	Transport	Ongoing - End of May
SADC IDP to 2041	Infrastructure	Complete - Published at Regulation 19 stage October 2024
Hemel Garden Communities IDP to 2050	Infrastructure	Ongoing - End of April 2025

15.11 Several engagement groups are established to support the delivery of the HGC programme. The different engagement groups, and engagement / milestones since Regulation 22 are set out below and within Table 15.2 and Table 15.3:

- The **HGC Developers Forum** has been established to progress discussions on delivery and implementation. Membership comprises of the landowners/ developers and local authorities. The HGC Developers Forum considers the timing, funding and delivery of key infrastructure such as transport schemes, including M1 Junction 8 enhancements.
- **Homes England and MHCLG Engagement** - The Hemel Garden Communities programme regularly meets with MHCLG, Homes England and the New Towns Taskforce Team to discuss accelerated housing delivery and support for early infrastructure funding across the entire HGC Programme Area (SADC and DBC Local Plans).
- Regular meetings with **National Highways** - The next meeting is on 12 March 2025.
- **Hemel Garden Communities Transport Sub-Group Meetings** - Ongoing engagement and workshops which includes SADC, DBC, HCC, National Highways, Homes England and Landowners/Developers. Since the Submission of the SADC Local Plan on 29 November 2024, meetings have been held on 19 December, 30 January 2025, and the next meeting is on 30 March 2025.
- **HGC Transport Officer Working Group** - Fortnightly meetings are held between SADC, DBC, HCC and HGC officers to progress, discuss and move forward transport workstreams.
- **HGC IDP to 2050 Meetings** - Meetings with a range of stakeholders have been held to support the development of the HGC IDP to 2050. A CIL/S106 officer workshop (SADC, DBC, HCC and HGC officers) was held on 30 January 2025 to discuss the delivery mechanism approach to support infrastructure delivery

across the whole of Hemel Hempstead and the HGC Growth Areas (The HGC Programme Area).

**Table 15.2 Schedule of Engagement and Milestones since Regulation 22**  
(December 2024 to February 2025)

<b>Date</b>	<b>Milestone</b>	<b>Attendees</b>
18 December 2024	National Highways Engagement Meeting (SADC and HCC)	SADC HCC officers National Highways
19 December 2024	HGC Transport Sub-Group Meeting - Initial findings from Joint SADC and DBC model run presented	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
6 January 2025	HGC Transport Officer Working Group Meeting	SADC DBC HCC HGC Officers
15 January 2025	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
15 January 2025	HGC Partner Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ
16 January 2025	HGC Delivery Board Meeting	SADC DBC HCC HGC Officers, Lead Members and Chief Officers Hertfordshire Futures / Herts IQ Homes England
20 January 2025	HGC Transport Officer Working Group Meeting	SADC DBC HCC HGC Officers
29 January 2025	National Highways Engagement Meeting (SADC and HCC)	SADC HCC Officers National Highways
30 January 2025	HGC Transport Sub-Group Meeting - Results from Joint SADC and DBC model run presented	SADC DBC HCC HGC Officers Growth Area Developers National Highways Homes England
30 January 2025	S106/CIL Officer Workshop in association with the HGC IDP (SADC DBC HCC HGC)	SADC DBC HCC HGC Officers Gilian Macinnes Associates
6tFebruary 2025	HGC IDP to 2050 Stakeholder Workshop - Transport	SADC DBC HCC HGC Officers Arup

12 February 2025	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
12 February 2025	HGC Partner Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ
13 February 2025	HGC Developers Forum Meeting	SADC DBC HCC HGC Officers Growth Area Developers Arup
25 February 2025	HGC IDP to 2050 Stakeholder Workshop - Sports, Leisure & Green Infrastructure	SADC DBC HCC HGC Officers Sport England Herts Sport & Physical Activity Partnership Arup
26 February 2025	HGC IDP to 2050 Stakeholder Workshop - Education	SADC DBC HCC HGC Officers Arup

**Table 15.3 Schedule of Upcoming Engagement and workstream milestones currently diarised**  
(March 2025 to Summer 2025)

Date	Milestone	Attendees
3 March 2025	HGC Transport Officer Working Group Meeting (Planned fortnightly)	SADC DBC HCC HGC Officers
5 March 2025	HGC IDP to 2050 Stakeholder Workshop - Health	SADC DBC HCC HGC Officers Arup
6 March 2025	HGC IDP to 2050 Stakeholder Workshop - Transport	SADC DBC HCC HGC Officers Arup
12 March 2025	National Highways Engagement Meeting (SADC and HCC)	SADC HCC National Highways
20 March 2025	HGC Transport Sub Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England

26 March 2025	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
26 March 2025	HGC Partner Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ
3 April 2025	HGC Developers Forum Meeting	SADC DBC HCC HGC Officers Growth Area Developers Arup
End of April	Anticipated Completion of the HGC Infrastructure Delivery Plan to 2050	-
7 May 2025	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
7 May 2025	HGC Partner Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ
15 May 2025	HGC Delivery Board Meeting	SADC DBC HCC HGC Officers, Lead Members and Chief Officers Hertfordshire Futures / Herts IQ Homes England
End of May 2025	Outputs from Joint SADC and DBC COMET model beyond the plan period, run including sensitivity testing	-
Summer 2025	More detailed and updated Statement of Common Ground with National Highways to address more detailed Transport matters	-
18 June 2025	HGC Partner Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ
18 June 2025	HGC Delivery Board Meeting	SADC DBC HCC HGC Officers, Lead Members and Chief Officers Hertfordshire Futures / Herts IQ Homes England
17 July 2025	HGC Delivery Board Meeting	SADC DBC HCC HGC Officers, Lead Members and Chief Officers Hertfordshire Futures / Herts IQ Homes England



NB: Many of the meetings above have been ongoing for several months and years, in progressing the Hemel Garden Communities Programme.

**Question 16 – In the absence of the additional evidence referred to above, what information is currently before the examination to demonstrate that the Hemel Garden Communities policies are effective, justified and sound, having particular regard to the necessary infrastructure and highways mitigation?**

- 16.1. As set out in the response to Question 15, the Council considers that there is comprehensive and sufficient evidence to support the Plan, its Policies and its allocations today. This includes evidence supplied in response to these questions, including the appendices. In totality, this evidence demonstrates that the Hemel Garden Communities policies are effective, justified and sound, having particular regard to the necessary infrastructure and highways mitigation.
- 16.2. The main outstanding issue regarding evidence base was raised by National Highways in their response to the Regulation 19 consultation, and that is addressed below and in response to Initial Question 2.
- 16.3. The evidence was largely set out in section 4 of the Hemel Garden Communities Evidence Paper (Examination Library HGC 01.01), which included:
- HGC Indicative Concept Plan (2024) (HGC 04.01)
  - HGC Framework Plan Story Document (HGC 04.02)
  - HGC Framework Plan Technical Evidence Report (2024) (HGC 04.03)
  - HGC Framework Plan Technical Evidence Appendices (2024) (HGC 04.04)
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  - HGC 2050 Transport Vision & Strategy Executive Summary (2024) (HGC 05.01)
  - HGC 2050 Transport Vision & Strategy (2024) (HGC 05.02)
  - HGC Potential Modal Shift Executive Summary (2023) (HGC 05.04)
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  - Heritage Impact Assessment Appendix 1 Hemel Garden Communities (2024) (EDH 04.02)
  - Hemel Hempstead Historic Study Report (2023) (HGC 06.02)
  - North Hemel Landscape Study Main Report (2024) (HGC 07.02)
  - Hemel Strategic Design Code Draft (2024) (HGC 06.01)
  - Green Infrastructure Strategy Final Draft (2024) (HGC 07.01)
  - Socio-economic and Demography Study (2024) (HGC 08.01)
  - Higher Education and Research Opportunities (2024) (HGC 08.02)
  - Heritage Impact Assessment Appendix 1 Hemel Garden Communities (2024) (EDH 04.02)
- 16.4. Further evidence that directly supports the allocation of HGC in the Plan and the policies includes:

- SADC Local Plan Infrastructure Development Plan (IDP) (2024) (INF 01.01)
- Appendix A1 SADC Infrastructure Schedule (2024) INF 01.02)
- St Albans Modal Shift Study (2024) (INF 09.12) Transport Impact Assessment COMET St Albans LP Modelling Report (2024) (INF 09.11).
- St Albans District Council Local Plan Viability Assessment (2024) (INF 10.01), prepared by BNP Paribas;
- East Hemel (Central) Site Viability Report (2024) (INF 10.02)
- East Hemel (North) Strategic Site Viability Report (2024) (INF 10.03);
- East Hemel (South) Strategic Site Viability Report (2024) (INF 10.04);
- North Hemel Hempstead Strategic Site Viability Report (2024) (INF 10.09);
- St Albans District LCWIP Final Report (2023) (INF 07.02);
- St Albans Local Plan Sustainability Appraisal Report (2024) (LPCD 03.02)

16.5. A further relevant document of is the Hemel Hempstead Sustainable Transport Study (2024) which was prepared by DBC (at Appendix 15.1)

16.6. The vision for HGC (HGC 03.01 HGC A Spatial Vision (2021)) has been used to guide the overall approach to infrastructure. The HGC Transport Vision and Strategy (HGC 05.02) sets out the key and local network which supports the mode share targets by 2050 across Hemel Hempstead (40%) and the new growth areas (60%). Further evidence which validates the vision is provided through three further reports which are the Hemel Hempstead Modal Shift Study (HGC 05.03), the St Albans District Modal Shift Report (INF 09.12) and Transport Impact Assessment COMET Model Report (INF 09.12).

16.7. It should be noted that SADC's draft Local Plan policies regarding HGC (Policies LG2 and LG3) were developed jointly between SADC and Dacorum BC, with the input of the Hemel Garden Communities team including HCC, although progress of the SADC draft Local Plan is not dependent upon that of DBC. DBC intend to submit their Local Plan to the Planning Inspectorate on 11 March 2025.

16.8. The SADC Local Plan IDP (2024) sets out the necessary infrastructure and highways mitigation (INF 01.02 and INF 01.02) for the HGC site allocations H1-H4. Dacorum BC has prepared its own IDP that sets out the necessary infrastructure and highways mitigation for HGC. As set out in response to Question 15, work is being undertaken to combine and align the HGC elements from the SADC IDP and DBC IDP, and to extend this beyond the Local Plans period to 2050. This document is due for competition at the end of April 2025.

16.9. Each of the SADC HGC site allocations and necessary infrastructure and highways mitigation (H1, H2, H3 and H4) has been appraised through the Local Plan Viability

prepared by BNP Paribas in 2024 (INF 10.02, INF 10.03, INF 10.03, and INF 10.09). The BNP Paribas viability testing demonstrates that all 4 HGC site allocations in SADC are viable and developable, having regard to both the Council's planning policy, highways and infrastructure requirements as set out in the SADC IDP, including 40% affordable housing and necessary infrastructure and highways mitigation. BNP Paribas viability evidence considers 'the 4 HGC site allocations to be developable as required by the NPPF i.e. it has a 'reasonable prospect' of being available and viably developed within the plan period.

Transport Initiatives to enhance M1 Junction 8 and surrounding area (Project Breakspear Phases 1-3)

- 16.10. In 2017, a collaborative group involving the key stakeholders completed the Maylands Growth Corridor Study. This concluded that a significant upgrade to M1 Junction 8 and the Breakspear roundabout were required to improve existing conditions and cater for future planned growth. This scheme became known as Project Breakspear. The project considers the capacity of the M1 motorway, upgrading the existing transport network, connecting Maylands Business Park and Herts Innovation Quarter to the road network, prioritising active and sustainable modes of travel, providing infrastructure for the new growth areas, and mitigating the impact from the growth associated with new homes (combined HGC growth from SADC and DBC Local Plan Hemel Hempstead growth).
- 16.11. The package of transport measures (Project Breakspear) to enhance M1 Junction 8 and surrounding area, consists of multiple elements, which can be split down into 3 different phases, which is set out within the SADC IDP (INF 01.01; INF 01.02):
- Phase 1 – The replacement of the existing Breakspear Way / Green Lane Roundabout with traffic signals (all HCC network).
  - Phase 2 – Prioritisation of active and sustainable modes of travel including the improvement of existing roads; A414 Walking and Cycle Bridge ' East Hemel Mobility Hub and the HGC Commercial Spine Road (HCC network and TCE land that is proposed for this purpose).
  - Phase 3 – M1 Overbridge - A new bridge over the M1, providing Maylands Business Park and the planned growth area with direct access to the M1 southbound, without the need to pass through Breakspear junction (predominantly TCE land that is proposed for this purpose and National Highways land).
- 16.12. Following completion of the Maylands Growth Corridor Study (MGCS, 2017), The Crown Estate and Hertfordshire Futures (Formerly Hertfordshire LEP) agreed to jointly fund the detailed design of the Project Breakspear Phase 1-Phase 3 schemes to enable early delivery of infrastructure, with the support of SADC, DBC,

HCC and HGC. To date, circa £6 million has been invested by Hertfordshire Futures and Crown Estate in the comprehensive and detailed design process, including a Stage 2 safety audit.

- 16.13. The proposed schemes in Phase 1-3 have been incorporated into COMET modelling work including the SADC Local Plan COMET 2041 run (Reg 19) and the Joint SADC/DBC COMET 2041 and 2050 (further runs). The SADC Local Plan BNP Paribas Viability appraisals of the SADC HGC sites (SADC Sites H1, H2, H3 and H4 (INF 10.02, INF 10.03, INF 10.03, and INF 10.09)) includes funding towards Phase 1 – 3 for M1 Junction 8 enhancements. This shows committed in principle developer funding for all of Project Breakspear Phase 1 and committed in principle developer funding for all of their proportion of necessary contributions towards Project Breakspear Phase 2. This further includes £33 million from HGC residential allocations and £5.83 million from the H3 employment uses in the SADC site allocations, totalling £38.83 million towards the Project Breakspear Phase 3 M1 overbridge, that will not be required at the earliest until the latter part of the Plan period.
- 16.14. The SADC Local Plan growth 2041 COMET model run demonstrates that the Project Breakspear Phase 3 M1 overbridge is not required for the SADC Local Plan period growth of 14,603 homes and background DBC growth (INF 09.11). HCC/WSP are carrying out further work with the Joint SADC and DBC COMET model (2041 and 2050 runs) to test the combined SADC and DBC Local Plan growth, of 29,935 homes, and associated trigger points for the Project Breakspear Phase 3 of M1 Junction 8 improvements. This work is anticipated to output by the end of May 2025.
- 16.15. Through the emerging HGC IDP to 2050 (due for completion in April 2025), apportionment for the M1 Junction 8 infrastructure costs is being established, including cross-boundary contributions from DBC Local Plan development, including 5,000 homes at Hm01 and wider growth in DBC. In principle, Hertfordshire Futures and Hertfordshire Innovation, and HGC Developers support and agree to contribute to costs regarding Junction 8 enhancements.
- 16.16. The HGC Framework Plan (2024) (HGC 04.01 ; HGC 04.02 ; HGC 04.03; HGC 04.04) was commissioned and prepared through a public and private sector joint-working arrangement between Hemel Garden Communities, Dacorum Borough Council, St Albans City & District Council, Hertfordshire County Council, The Crown Estate, Bloor, Pigeon Land and Kitewood. A governance structure was put in place to oversee the process. Regular Framework Plan Steering Group and Working group meetings were held to direct the preparation of the Framework Plan and ensured information and evidence were shared with, and drawn from, a wider group of local authority officers and other key stakeholders.

16.17. The HGC Framework Plan exercise was undertaken in order to:

- **Prepare a single holistic spatial Framework plan** - Prepare a single, holistic spatial Framework Plan for the Growth Areas (For SADC site allocations H1-H4 and DBC Site Allocation Hm01), drawing on best practice in masterplanning and guided by garden community principles. The Growth Area straddles two LPA boundaries and multiple land holdings. The Framework Plan adopts a holistic view of the area and provides a single framework for growth. The work has been approached on an 'ownership blind' basis to achieve an optimum spatial / functional solution;
- **Test site capacity and site requirements** - Test the capacity of the sites and any reasonable options to deliver up to 11,000 homes and around 10,000 jobs along with other relevant and/or emerging policy requirements including appropriate standards of open space, sustainable drainage, biodiversity net gain, Suitable Alternative Natural Greenspace (SANG), primary and secondary schools, and transport and highway infrastructure;
- **Quantify and assess viability for infrastructure requirements across the HGC Growth Areas** - This framework exercise has facilitated the preparation of an infrastructure schedule aligned with the Infrastructure Delivery Plans (IDPs) of each Local Planning Authority. The Framework Plan Infrastructure schedule outlines the key infrastructure components required to support sustainable development, including transport networks, utilities, social infrastructure, and green spaces.

16.11 The outcomes of the Framework Plan, including the infrastructure schedule and iterative viability appraisals, were shared with BNP Paribas and Arup. Both consultants considered the Framework Plan outcomes, in preparing the site allocation viability appraisal reports (INF 10.02, INF 10.03, INF 10.03, and INF 10.09) and the SADC Local Plan IDP (INF 01.01; INF 01.02). The BNP Paribas SADC Local Plan viability testing (INF 10.02, INF 10.03, INF 10.03, and INF 10.09) demonstrates that all 4 HGC site allocations are viable and developable, having regard to both the Council's planning policy, highways and infrastructure requirements as set out in the SADC IDP, including 40% affordable housing.

16.12 To summarise, the HGC Framework Plan exercise has produced a holistic spatial framework; and provides robust evidence supporting site allocations within the Local Plan and that the HGC growth areas are feasible and deliverable. Its outcomes have informed the BNP Paribas viability appraisals and the SADC Local Plan IDP.

**Question 17 – Based on the answers to the questions above, how have the associated costs and viability of the sites been accurately established and tested?**

- 17.1. The Council considers there is sufficient evidence to date to demonstrate the SADC HGC site allocations' viability. Each of the HGC site allocations (H1, H2, H3 and H4) has been appraised through the Local Plan Viability prepared by BNP Paribas in 2024 (INF 10.02, INF 10.03, INF 10.03, and INF 10.09). As set out above, in response to Question 16, The BNP Paribas viability testing demonstrates that all 4 HGC site allocations are viable and developable, having regard to both the Council's planning policy, highways and infrastructure requirements as set out in the SADC IDP, including 40% affordable housing, highways and infrastructure mitigation, including appropriate contributions towards Junction 8 improvements (Phase 1-3). BNP Paribas viability evidence considers the 4 HGC site allocations to be developable as required by the NPPF i.e. it has a 'reasonable prospect' of being available and viably developed within the plan period.
- 17.2. The HGC Framework Plan (2024) (HGC 04.01 ; HGC 04.02 ; HGC 04.03; HGC 04.04) was commissioned and prepared through a public and private sector joint-working arrangement between Hemel Garden Communities, Dacorum Borough Council, St Albans City & District Council, Hertfordshire County Council, The Crown Estate, Bloor, Pigeon Land and Kitewood.
- 17.3. The HGC Framework Plan exercise was undertaken in order to:
- **Prepare a single holistic spatial Framework plan** - Prepare a single, holistic spatial Framework Plan for the Growth Areas (For SADC site allocations H1-H4 and DBC draft Local Plan Site Allocation Hm01);
  - **Test site capacity and site requirements** - Test the capacity of the sites and any reasonable options to deliver up to 11,000 homes and around 10,000 jobs along with other relevant and/or emerging policy requirements including appropriate standards of open space, sustainable drainage, biodiversity net gain, Suitable Alternative Natural Greenspace (SANG), primary and secondary schools, and transport and highway infrastructure;
  - **Quantify and assess viability for infrastructure requirements across the HGC Growth Areas** - This framework exercise has facilitated the preparation of a cross-boundary infrastructure schedule aligned with the Infrastructure Delivery Plans (IDPs) of each Local Planning Authority.
- 17.4. The outcomes of the HGC Framework Plan, including the cross-boundary infrastructure schedule and viability appraisal, were shared with and considered by BNP Paribas and Arup during preparation of the site-specific Local Plan viability appraisals (INF 10.02, INF 10.03, INF 10.03, and INF 10.09) and the SADC Local Plan IDP (INF 01.01; INF 01.02). To summarise, the HGC Framework Plan exercise

has produced a holistic spatial framework; and provides robust evidence supporting site allocations within the Local Plan and that the HGC growth areas are feasible and deliverable. Its outcomes have informed the BNP Paribas viability appraisals and the SADC Local Plan IDP.

- 17.5. While the SADC IDP (2024), BNP Paribas Viability, and the HGC Framework Plan are considered to provide sufficient evidence to support the draft Local Plan allocations at HGC to date, as would be expected with a major project such as HGC, viability and costs will continue to be iterated and reviewed. Viability work is underway in association with the overall HGC IDP to 2050. Additional viability work will continue to be updated in line with the latest HGC programme developments.



**Question 18 – The housing trajectory in the Plan suggests that the Hemel Garden Communities sites will deliver 4,300 new homes over the plan period. What is this based on and is it justified? Can the sites deliver the scale and quantum of housing envisaged by the Plan? Are they developable?**

- 18.1. The SADC housing trajectory for HGC sites (Site Allocations H1, H2 and H4) has been developed through an approach to build out rates based on the methodology set out in the Lichfields' 'Start to Finish' report (Second Edition, 2020 and Third Edition, March 2024). The SADC approach for the HGC sites has been adjusted in relation to the Lichfields' methodology because of the unique scale and nature of the HGC programme (11,000 homes). The detailed housing trajectory for each HGC site, as set out in the Housing Topic Addendum (HOU 01.01), is provided at the end of this question's response (See Table IQ.18).
- 18.2. The justification for the approach taken to the HGC housing trajectory is based on:
- Provision of the widest range of different housing types, tenures and diversity in housing stock, contributing to higher build out and absorption rates;
  - High market absorption rates due to SADC's desirability;
  - Affordable housing and supported living contributing to higher build out and absorption rates;
  - Strategic scale of site, enabling delivery of infrastructure;
  - Strategic scale of site, allowing for multiple outlets for housing delivery;
  - Analysis of strategic scale development;
  - Capacities having been tested through the HGC Framework Plan;
  - That all HGC site allocations (H1-H4) are in Planning Performance Agreements (PPAs); and
  - Support and input from Landowners, commercial agents including Savills, Homes England and others.
- 18.3. The findings from the Lichfields' report is focused mostly on sites of up to 2,000 dwellings and has limited examples beyond 5,000 homes in size. Therefore, SADC consider it is appropriate to use its own methodology which takes into account other strategic scale developments (2,000 + dwellings). The HGC trajectory has been informed by the Council's own analysis of strategic scale development from other Councils, including Milton Keynes, Ebbsfleet Garden City, Northstowe in Cambridgeshire and Cranbrook, East Devon. It has also been informed by discussion with Homes England, Dacorum Borough Council, Hertfordshire County Council, Hertfordshire Futures (Former Herts LEP), Hyas Associates, the Crown Estate, Savills, David Lock Associates and others.

- 18.4. The Landowners - The Crown Estate, Pigeon and Bloor (H1 – H4 allocations) - have shown support for the housing trajectory in the Regulation 19 responses (Ref No. 272, 286, 289 and 337) and in their Statements of Common Ground with the Council (see examination documents SADC/ED12, SADC/ED13 and SADC/ED22).
- 18.5. The overall HGC Trajectory, comprising of both SADC and DBC site allocations, is annually reported to Homes England, since 2021 and they continue to support the delivery rates set out in the Plan.
- 18.6. The District is a highly attractive housing market with high demand for new homes. It should be noted that the Lichfields' 'Start to Finish' report states that areas such as St Albans with a higher demand for housing (as measured by higher affordability ratios, of house prices to earnings) had higher average annual build out rates than lower demand areas. National data (2023) shows that out of 318 Local Authority areas in England St Albans has the fifth highest affordability ratio. Lichfields' 'Start to Finish' report also states that schemes with higher proportions of affordable housing had faster average annual build-out rates (which applies in St Albans District), and that schemes with additional outlets had a positive impact on build-out rates (which often applies in St Albans District, particularly for Broad Location scale development).
- 18.7. There are other factors influencing higher build out rates on strategic scale sites, such as Infrastructure Delivery, diversified housing types including provision of affordable housing, supported living schemes and Build to Rent.
- 18.8. The strategically planned nature and scale of HGC, enables developers to capitalise on economies of scale, improving cost efficiency, while also providing critical infrastructure and community facilities. The very large scale of HGC offers the potential to provide a broad mix of housing tenures, including owner-occupied, affordable rent, shared ownership, and private rented schemes and Built-to-Rent.
- 18.9. By catering to a diverse range of housing types and demographics - such as first-time buyers, families, and older residents - the development can meet the complete range of different housing needs simultaneously. The inclusion of various tenure types diversifies the housing stock and ensures that homes are accessible to a wider range of people, supporting faster absorption and sales rates.
- 18.10. As outlined in response to Question 15 and 16, the HGC Framework Plan, which was developed jointly with landowners, has produced a holistic spatial framework which has tested and demonstrates the site capacities associated with the quantum of housing, and policy and infrastructure requirements are achievable and can be delivered. The Framework Plan evidence demonstrates that the site

allocations are developable, suitable and policy compliant. (HGC 04.01 ; HGC 04.02 ; HGC 04.03 ; HGC 04.04).

- 18.11. BNP Paribas viability evidence considers the 4 HGC site allocations to be developable as required by the NPPF i.e. it has a 'reasonable prospect' of being available and viably developed within the plan period.
- 18.12. Each of the four site allocations (H1, H2, H3 and H4) within the SADC District are advanced through the Pre-Application stage, with initial Planning Performance Agreements (PPAs) discussion commencing from Winter 2023. Outline applications are due to be submitted in Autumn 2025. The PPAs are all progressing on the basis of the delivery rates set out in the Plan.
- 18.13. The Crown Estate (TCE) entered initial discussions regarding a Planning Performance Agreement (PPA) in Winter 2023 for land East of Hemel Hempstead (Site Allocations H2, H3 and H4). A PPA agreement between TCE, SADC, DBC, HCC and HGC was signed in July 2024. The Crown Estate plan to submit an outline planning application for submission in Autumn 2025. The outline application would be for: up to 4,000 new dwellings (to include 40% affordable housing, 5 extra-care facilities each comprising 70-80 self-contained units, 3 nursing homes (each of 70-80 beds) and 16 supporting living units); up to 53ha of employment and ancillary facilities (to include 17ha of Business (Ei), Research and Development (Eii) and 36ha of Logistics (B8) and mixed industrial uses (B2 and Eiii)). The application would cover all of the site allocations H2, H3 and H4.
- 18.14. Significant progress has been made to date through the PPA process for Land East of Hemel Hempstead. The Environmental Impact Assessment scoping report was submitted in December 2024 (Application 5/2024/2171) and a formal scoping opinion was issued on 21st January 2025. A Design Review Panel held by Design South East, took place in December 2024, and the next Design Review Panel is planned for March 2025. To date, the Crown Estate have undertaken a range of engagement and consultation events including public engagement in October and November 2024; engagement with Members in November and December 2024; a residents' site visit to Cambridge in December 2024; and a series of community engagement workshops in January 2025. Further engagement exhibition events are planned for February and March 2025.
- 18.15. Pigeon and Bloor Homes entered initial discussions with SADC regarding a Planning Performance Agreement (PPA) in Summer 2023 for Land North of Hemel Hempstead (Site Allocation H1). The PPA process and meetings commenced in October 2024, with the first masterplanning PPA meeting held on 13th February 2025. The North Hemel Hempstead PPA between SADC, HCC, HGC, Pigeon and Bloor was agreed for signing in February 2025. Pigeon and Bloor plan to submit an

outline planning application for submission in Autumn 2025 for up to 1,500 homes; a 3FE primary school, including Early Years provision; a new local centre; Strategic and local public open space, including sports facilities; substantial new Significant Publicly Accessible Green Area providing facilities for new and existing communities and a permanent green buffer to Redbourn.

- 18.16. To conclude, the justification for the HGC housing trajectory is based on the sites' strategic scale, diverse housing provision, strongly evidenced high market absorption rates, tested capacities, and strong stakeholder support, ensuring efficient delivery and infrastructure development. As a result the Council is satisfied that the HGC sites are developable and can deliver the scale and quantum of housing envisaged by the Plan.

**Table 18.1: Housing Trajectory for the HGC Sites**  
 (Housing Topic Paper Addendum (2024) (HOU 01.01))

Reference Number	Site Name / Address	Estimated Gains (Net)	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41
H1	North Hemel Hempstead	1,125							50	75	100	100	100	100	100	125	125	125	125
H2	East Hemel Hempstead (North)	1,235						50	50	100	115	115	115	115	115	115	115	115	115
H4	East Hemel Hempstead (South)	1,940						50	75	75	100	125	150	150	225	250	260	255	225
<b>Hemel Garden Communities - Total</b>		<b>4,300</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>100</b>	<b>175</b>	<b>250</b>	<b>315</b>	<b>340</b>	<b>365</b>	<b>365</b>	<b>440</b>	<b>490</b>	<b>500</b>	<b>495</b>	<b>465</b>

**Question 19 – What contingency mechanisms does the Plan include if the scale of development envisaged at the Hemel Garden Communities is not realised?**

- 19.1. There is strong evidence to support that the development will come forward as envisaged. Each of the four site allocations (H1, H2, H3 and H4) within the SADC District are at Pre-Application stage, have made significant progress through structured Planning Performance Agreements (PPAs) and have outline applications anticipated to be submitted in Autumn 2025 (As addressed in Question 18). Furthermore, the HGC landowners have each expressed support in Statements of Common Ground for the housing trajectory and the Key Development Requirements for the Hemel Garden Communities sites (see examination documents SADC/ED12, SADC/ED13 and SADC/ED22)
- 19.2. There is an extensive and comprehensive system of governance to support the Hemel Garden Communities (HGC) programme. The HGC programme and its associated wider governance also offers a mechanism to review progress of the delivery of HGC. The HGC Delivery Board is the most senior level of governance and includes membership from Lead Councillors and Chief Officers from the Authorities, as well as Homes England, Hertfordshire Future and Herts Innovation Quarter. The HGC Delivery Board then feeds back into the respective authorities' governance systems. (*See Appendix IQ19*)
- 19.3. The Hemel Garden Communities programme regularly meets with, and is in discussions with, MHCLG, Homes England and New Towns Taskforce Team. Regarding the acceleration of housing delivery, discussions are underway regarding early infrastructure delivery across the HGC Programme Area (SADC HGC Growth Areas and Hemel Hempstead in DBC) and HGC's role in contributing to the delivery of the Government's growth agenda.
- 19.4. Given the NPPF 2024 approach, the Council will commit to an immediate review of the Local Plan upon its adoption, ensuring alignment with the latest National Planning Policy Framework (NPPF) and any relevant planning reforms. Future Local Plan Reviews will provide an ongoing contingency mechanism to assess and update policies as necessary. This is particularly relevant given that the housing trajectory shows the first homes being delivered from 2029/2030. Peak build out rates occur in Years 10 – 15 (2036 onwards) and housing delivery also goes beyond the Local Plan period.
- 19.5. It can additionally be noted that in the Sustainability Appraisal at Regulation 18 stage (2023, LPCD 03.03) there was consideration of HGC at different scales of development, but at Regulation 19 stage (2024, LPCD 03.02) HGC

was treated as a constant, given that it plays a crucial role in meeting housing and employment land needs in SADC and DBC's areas and more widely in SW Herts.