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KITEWOOD ESTATES LTD REPRESENTATION TO ADDITIONAL DOCUMENTS CONSULTATION 4 JULY TO 22 AUGUST 2025

As outlined in the comments that Kitewood Estates Ltd ('Kitewood') submitted to the Draft Local Plan 2041 Regulation 19, Kitewood is a development company and landowner of part of the proposed Hemel Garden Communities (HGC) Growth Area to the north and east of Hemel Hempstead.

Our landholding falls wholly to the north within Dacorum Borough, and abuts the boundary with the St Albans City & District, adjacent to the Reg 19 Local Plan proposed allocation H1- north Hemel Hempstead.

At that time, we raised our concerns in relation to the effectiveness of the submitted Local Plan, particularly in relation to Policies SP1, SP8 and TR1 because the evidence did not yet exist to demonstrate effective joint working on cross-boundary strategic matters.

We therefore welcome the opportunity to respond to 'Additional Documents Consultation' and our comments specifically relate to the new **Transport Modelling** Work.

Transport Modelling

On the Topic of Transport Modelling, Mark Kiby, Director at Velocity Transport Planning, has undertaken a high-level review of the Examination Documents contained on the SADC Consultation Website, with particular regard to the following:

Ref No	Date	Document Source	Document Title	Date Uploaded
SADC/ED66	2024	DBC	Hemel Hempstead Sustainable Transport Study	05/03/2025
SADC/ED76	04/07/2025	SADC	Transport Note relevant to Transport Documents (SADC/ED76A through to SADC/ED76C)	04/07/2025
SADC/ED76A	May 2025	WSP/Vectos	Comet Forecasting Report – Combined Joint Test 2041 and 2050 (Including Appendix 1 & 2)	04/07/2025
SADC/ED76C	July 2025	SADC/WSP	St Albans Local Plan Transport Forecasting & Narrative Document	04/07/2025
SADC/ED76C	July 2025	SADC	SADC Comet Run 2041 Addendum	04/07/2025

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It is understood that WSP undertook the transport modelling work to assess the impact of the St Albans District Council (SADC) Local Plan proposals and the Dacorum Borough Council (DBC) Local Plan proposals on the highway network. The assessment was informed by the Countywide Model of Transport (COMET), which covers all of Hertfordshire and the surrounding areas. The COMET model includes a highway assignment model, a public transport model, and a variable demand model. The base year of the model is 2014 and the future year is 2041.

The main objectives of the modelling work are as follows:

- Review the performance of the base year model in SADC & DBC and the Strategic Road Network (SRN) and make improvements where necessary
- Develop a range of future year scenarios to test the impact of the Local Plan allocations and associated infrastructure improvements
- Provide evidence of the impacts that the Local Plan sites could have on the existing highway network and junctions

The DBC site allocations that form part of the wider HGC Growth Area are identified as being HM01 and HM14. With regards to the SADC Local Plan proposals, the Transport Modelling work acknowledges that the East Hemel Hempstead site allocations (H1, H2, H3 and H4) are part of the wider HGC Growth Area.

However, it appears that the relationship with the wider proposed Growth Area has not been comprehensively considered in the transport modelling assessment work that is now being consulted on.

Whilst the HGC Growth Area straddles two authority boundaries, it is a single proposed Growth Area to Hemel Hempstead, and we consider that it needs to be treated as such in the Local Plan evidence base.

Furthermore, Kitewood maintain the view; that in order to facilitate the comprehensive development of the proposed Growth Area and to ensure the required modal shift (identified as being 60% of all trips starting and/or ending in the HGC Growth Area should be by active and sustainable travel modes), the cross-boundary Sustainable Transport Corridor (STC) will need to be delivered within the Plan period. In fact, to ensure that new residents of the HGC Growth Area are afforded alternatives to the private car in order to meet the modal shift target, the STC should be operational prior to any significant level of occupation within the Growth Area as a whole.

It is considered that the STC will need to accommodate vehicles amongst other modes of transport, and it is therefore necessary for the cross-boundary vehicular connectivity to be accommodated in the modelling work with respect to the proposed allocations H1, H2, H3 and H4, and evidence relating to the delivery of the STC should be provided in order to evidence that the proposed modal shift is realistic.

Whilst we acknowledge that the soundness of the respective Local Plans needs to be considered independently, both of the emerging Local Plans are reliant on delivery from the HGC Growth Area within the plan period and there are interdependencies in that regard particularly in relation to the STC and access between all of the proposed allocations. **We therefore maintain the opinion that the evidence still does not exist to demonstrate effective joint working on cross-boundary strategic matters in relation to HGC as a whole.**

Yours sincerely,

Sara Sweeney MRTPI

For and on behalf of Kitewood Estates Ltd

cc. Paula Carney- CarneySweeney

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