

September 2025

Stage 2 Hearing Statements – Matter 6

St Albans City & District Local Plan

On behalf of Lands Improvement Holdings & Lawes
Agricultural Trust

Contents

- Matter 1 – Legal Compliance
- Matter 2 – Housing Growth and the Spatial Strategy
- Matter 3 – The Green Belt
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Stage 2 Hearings – St Albans City & District Local Plan

Weeks 2 and 3 MIQ Response on behalf of Lands Improvement Holdings ('LIH') and Lawes Agricultural Trust ('LAT').

- 1.1 Submissions are made in respect of:
 - Matter 1 – Legal Compliance
 - Matter 2 – Housing Growth and the Spatial Strategy
 - Matter 3 – The Green Belt
 - Matter 6 – Hemel Garden Communities ('HGC')
 - Matter 7 – Residential Site Allocations (St Albans sites & Urban Car Parks and Garage Sites)
- 1.2 Overview

This response to the Stage 2 Examination, Week 2 and 3 Matters, Issues and questions (MIQ's) has been prepared by Urbanissta Ltd on behalf of Lands Improvement Holdings ('LIH') and Lawes Agricultural Trust ('LAT') in relation to the Land at North East Redbourn ('Site').
- 1.3 Assistance has also been provided by Town Legal (TL) in preparing these representations.
- 1.4 LIH is a strategic development company that acquires land and is the promoter partner of the Site owners, LAT. The Site has been deemed surplus to LAT's operational requirements and is available to provide longer term funding to support LAT. Together LIH and LAT seek to secure the release of the Site from the Green Belt for a residential led development scheme.
- 1.5 These MIQ submissions, supplement update and in some instances rely upon the material prepared and submitted at Regulation 18 and 19 stages of the draft Local Plan, as well as building upon MIQ submissions (oral and written) made for Matters 1 – 3 of the Examination before, during and after the Stage 1 hearing sessions. Submissions have also been made regarding the duty to cooperate (11th June 2025) and the St Albans City and District Council (StADC) Technical Consultation of August 2025. Collectively, these submissions in combination, are referred to in this MIQ Submission, as the (LIH/LAT Submissions)¹.
- 1.6 North East Redbourn is an omission site. A PPA has been agreed with StADC and an outline planning application is targeted for submission in January 2026. It is in a sustainable location, it is grey belt, capable of meeting the Golden Rules as defined by the NPPF (2024). It has been accepted as such, by StADC in a pre-application response dated 23rd May 2025.

"it is considered that the site would be likely to constitute grey belt as defined in the NPPF, and may be capable of meeting the Golden Rules requirements..... the planning policy context has changed significantly since our previous discussions and there is greater potential than was previously the case for the proposal to be considered acceptable in principle."
- 1.7 The Site is not in the National Landscape (NL), or in the setting of the NL. It is located on an eastward facing slope facing away from the NL and is over 2.5km from the NL boundary. Visibility testing has confirmed that the Site and proposed development would not be visible from the NL and therefore would not affect the setting of the NL. North East Redbourn lies toward the edge of the 12.6km Ashridge Commons and Woods buffer and will provide its own SANG as mitigation for any potential impacts arising.

¹ LIH/LAT Submissions:

- Regulation 19 - St Albans Technical Submission - Final Draft - 7th November 2024 and associated material listed in paragraph 2.1 & 2.4 p8;
- Regulation 18 - St Albans Technical Submission - Final Submission - 25th Sept 23 and associated material listed in paragraph 1.6 p8 and the Identified Sites Deliverability Assessment (September 2023).
- Town Legal Letter to StADC 18th June 2024
- Appendix 3 - Green Belt Appraisal & Landscape Analysis 07 November 2024
- MIQ's Submissions Matters 1, 2 and 3 – 14th April 2025.
- Hearing Statement 11th June 2025 on Duty to Cooperate
- LIH Submission to the St Albans Technical Consultation - 18th August 2025 FINAL DRAFT

Stage 2 MIQ's

Lands Improvement Holdings & Lawes Agricultural
Trust

Matter 6

Hemel Garden

Communities

Matter 6 - Hemel Garden Communities ('HGC')

WEEK 3

Hearing Day 8: Tuesday 21 October 2025

Hearing Day 9: Wednesday 22 October 2025

Morning Session – 10:00 – 13:00

Afternoon Session – 14:00 – 17:30

DEADLINE 26th September 2025

Attendance.

Issue 1 – Justification for Strategic Growth

- 1.8 11. *The HGC Evidence Paper prepared by St Albans City and District Council sets out the various stages in the evolution of HGC to date (Core Document HGC01.01). In 2019 the proposal was awarded Garden Town Status. The extent of the HGC Programme Area is shown on St Albans Local Plan Figure 3.1 and Dacorum Local Plan Figure 7.*

M6I1Q1 What is the difference between the HGC Programme Area and the HGC Framework Plan area? Is it sufficiently clear in both the St Albans Local Plan, and the Dacorum Local Plan, what HGC is and which areas it relates to?

- 1.9 In our view, it is confusing to seek to differentiate between the HGC Programme Area and the HGC Framework Plan area. We understand the HGC Programme Area to represent the geographical extent of the whole Hemel Garden Community (HGC) proposals whilst the HGC Framework Plan Area refers to the specific growth areas within the Programme Area. Given the cross-boundary considerations between StADC and Dacorum Borough Council (DBC) and wider deliverability considerations, a clear (perhaps graphical overlay) of the two proposed areas would assist in interpreting the two areas with suitable explanatory text produced by StADC and DBC to provide background and context

M6I1Q2 To be effective, should both Local Plans include a breakdown, in policy, which sets out the component parts of HGC and what is expected from each parcel?

- 1.10 Yes, that would be helpful and cross refer to the aspects within the adjacent LPA administrative areas. Greater details on the face of the relevant local plan policies should also be provided as to the delivery targets, triggers and thresholds which would assist, among other things, in interpreting the expectations for delivery from each aspect of HGC.

M6I1Q3 How do the sites at Marchmont Farm, Spencer's Park, land West of Hemel Hempstead and land adjacent to the Manor Estate relate to the growth proposed at HGC?

- 1.11 No comment.

M6I1Q4 Having established the principle of growth at and around Hemel Hempstead, how was the scale of development determined?

- 1.12 As set out in the LIH/LAT submissions¹, there is a lack of detail in either the policy or underlying evidence base as to matters such as delivery targets, triggers and thresholds. There has also been very limited detail provided on the assumptions that underpin the timescales and rationale for the StADC's Local Plan delivery assumptions and/or the level of growth likely or proposed beyond the plan period, especially should the expectations set out in the draft Plan(s) not be achieved as anticipated. There are also no contingency/mitigation measures identified for circumstance where delivery does not meet identified thresholds.

M6I1Q5 How did factors such as the Green Belt and proximity of the Chilterns National Landscape inform decisions around growth at Hemel Hempstead?

- 1.13 The GBR 2023 undertaken by David Jarvis Associates which formed part of LIH Submissions¹ Section 2.0 of Appendix 3² found that (in summary):
- The size of the Study Area is not comparable with the Regulation 19 Allocated Site anomalies in the score is to one or several overlapping Study Areas.
 - The Allocated Site will result in some erosion and closing of the Strategic gap between St Albans and Hemel Hempstead and between Hemel Hempstead and Watford.
 - Harm to the openness of the Green Belt would exceed the combination of SA-164 and SA-165 given the parcel location and wider countryside setting, relationship to the golf course and extension of development further south into the countryside.
- 1.14 The LIH GBR 2023^{5,6} indicated that the key limitations of the Arup GBR 2023 (GB02.02 to GB 05.01) study, included:
- not fully assessing the settlement edge context and how this influences the Site;

² Section 2 - Appendix 3 - 2941-4-1-TD-0001-S5-P3 NE Redbourn GB Appraisal to LIH Regulation 19 Submissions¹

- underplaying qualitative character for some draft allocations.
- specifically seeking to provide a more granular approach than previous reviews but then failing to take account of the specifics of sites (such as NorthEast Redbourn) in ways that represented an understanding of the immediate [site] context in accordance with its own methodology. The review and subsequent utilisation/interpretation by StADC did not recognise and acknowledge the need for a site-by-site analysis and should not have attempted to rule out certain areas at the outset³.

1.15 With regards to the NL, this is for StADC and the site promoters to justify.

Issue 2 – Site Boundaries (including Green Belt alterations)

M6I2Q1 Having established at a strategic level that alterations were necessary to the Green Belt boundary, how did the Councils determine the extent of alterations required?

1.16 No comment.

M6I2Q2 How do the proposed boundary alterations relate to the supporting evidence through the Green Belt Assessments and site selection methodology?

1.17 As detailed for M6I1Q5, the GBR 2023 had inherent flaws which were then directly carried through into decisions taken in the site selection process to include (or exclude) sites for further consideration. LIH/LAT Submissions¹ show that had a more robust approach been taken in the GBR 2023 alternative land uses decision could have been taken and/or more robustly tested through the Sustainability Appraisal and site selection process.

M6I2Q3 Are the proposed boundary alterations consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

1.18 It is unclear to us (on the current evidence base) as to the rationale for the HGC beyond the plan period in plan or capacity terms.

Issue 3 – Highways and Transport

M6I3Q1 Is the strategic modelling an appropriate tool for assessing likely impacts of growth at HGC on the strategic road network, and, for determining necessary mitigation?

1.19 The LIH/LAT Submissions¹ in particular, Section 2.0 of the Identified Site Delivery Assessment⁴ highlighted several significant delivery constraints which will affect the HGC sites from delivering as anticipated in the draft Plan. These key constraints include:

- Large scale infrastructure requirements.
- The need for social and community facilities to be delivered (in a timely manner to accommodate the scale of the proposed development).
- The questionable ability to deliver the number and extent of dwellings proposed in the plan period.
- Ability to deliver housing if infrastructure requirements were not delivered as anticipated.
- The ability to deliver the necessary SANG and Country Park provision.
- The questionable ability for the sites to deliver on the level and scale of growth anticipated for later in the plan period.

1.20 Accordingly, the LIH/LAT Submissions¹ concluded that a substantial number of the anticipated dwellings would not be capable of delivery as anticipated within the plan period and set out in the Table 3.2 Trajectory of the Plan. It was shown that additional sites (including the North East Redbourn site) were required to be allocated to ensure housing was delivered in line with requirements.

M6I3Q2 What are the implications of the growth proposed at HGC on the strategic road network, having particular regard to Junction 8 of the M1?

1.21 No comment

M6I3Q3 Can any significant highways impacts (in terms of capacity and congestion), or on highway safety, be cost effectively mitigated to an acceptable degree, consistent with paragraph 114 of the Framework? How have the need for highways improvements been costed, and will the sites proposed for allocation at HGC remain viable?

1.22 The LIH/LAT Submissions¹ detail the lack of information on scheme viability provided in the Infrastructure Delivery Plan (IDP), especially when having regards to the target triggers and timescales for delivery. The lack of detail on such cost considerations and their implications for deliverability at HGC appear to have not been

³ Paragraph 5.3 Appendix 3 - 2941-4-1-TD-0001-S5-P3 NE Redbourn GB Appraisal to LIH Regulation 19 Submissions¹

⁴ Section 2.0 - LIH Regulation 18 - Identified Sites Deliverability Assessment - FINAL Compressed Version - 25th Sept 23

fully assessed. Viability assessments (INF10.01 to 0.04) don't assess the HGC scheme viability as whole and it is unclear how infrastructure requirements for the site have been apportioned across the differing elements of the HGC project and, how the various infrastructure requirements - and delivery risks - might impact upon viability especially if infrastructure requirements are frontloaded to facilitate impact mitigation. Indeed, potentially on-site infrastructure requirements have been assessed⁵ for viability when inevitably, some aspects of infrastructure delivery (such as new motorway junctions) relate to more than just one of the anticipated development parcels and, it is unclear how such costs and trigger thresholds, have been considered.

- 1.23 The site-specific viability assessments (INF10.01 to 0.04) also indicate for example⁶ on Base Build Costs and Infrastructure the costs taken into account in the viability appraisal, include a range of standard factors such as house build, heath provision etc. 10% provision has been added for external works with an allowance for professional fees, development finance, marketing and legal costs, and s106 obligations. The highways' related costs are set out in Table 3.2.14.17 which includes:

- "£6,826 per home for active travel (index linked in accordance with HCC developer contributions toolkit)
- £11,000 per home for transport requirements (e.g. Highways)
- £385,000 for mobility hub"

- 1.24 It is not clear to us whether the future homes standard has been taken into account in the viability assessments (INF10.01 to 0.04) but we appear unable to find any reference to such in such documentation.

- 1.25 It is unclear the basis for these apportioned costs and how the infrastructure phasing and delivery will have a bearing on such. Greater transparency and a holistic approach to the HGC viability will also be important to assess the project's actual deliverability and viability trajectory. This example is a demonstration of the selectivity in the assessment process and lack of comprehensive regard to the HGC site, its potential deliverability and viability considerations and the implications for such in securing the anticipated very ambitious delivery rates for the scheme as set out in Trajectory at Table 3.2 of the Local Plan.

M6I3Q4 Where mitigation is required, is it sufficiently clear to users of the Plan what is required, and where and when it will be delivered as required by policy?

- 1.26 Not it is not sufficiently clear in our view for the reasons set out in the LIH/LAT MIQ submissions above and in the detailed LIH/LAT Submissions¹.

M6I3Q5 What is the justification for the sensitivity testing which looks at a reduced number of jobs at East Hemel Hempstead (Central)? How does this correlate to the allocation in the St Albans Local Plan and the mix of uses proposed?

- 1.27 The wider corporate strategy growth for St Albans is linked to employment and if jobs requirements are to be reduced then the proposed allocation has a questionable basis as it would not represent a fully mixed-use development. As detailed at M6I4Q1a more holistic approach to site assessment is required.

- 1.28 Principle 5 of HGC is to achieve 'a wide range of local jobs in the Garden City within easy commuting distance of homes'⁷. As such, a reduction in jobs undermines a core principle. Consequently, assumptions in the plan/evidence base (including the SA) on achieve a 'Self Sustaining Economy'⁸ compromise assumptions made on matters such as traffic survey's; the internalisation of trips; sustainability. Measures such as 'employment innovation and diversification' and the 'focus on agricultural and construction sectors, and research and development supported by the Green Triangle, a partnership aiming to establish Hertfordshire as a centre of excellence in green technology', will all be undermined and should be reassessed by the plan and it's associated assessment and assumptions. Should sustainability aspirations not be achieved as anticipated, other potential development opportunities (such as North East Redbourn) should be considered.

M6I3Q6 What are the implications of the growth proposed at HGC on the local road network, having particular regard to the consequences of additional congestion and delays on the M1?

- 1.29 No comment.

M6I3Q7 In assessing the impacts of cumulative growth at HGC, how does the evidence take into account the likelihood of modal shift away from private car use? Has this been applied consistently and is it justified?

- 1.30 No comment.

⁵ Page 3 East Hemel (North) Strategic Site Viability Report September 2024 (INV 10.03) for example

⁶ Paragraphs 3.2.9 to 3.2.17 East Hemel (North) Strategic Site Viability Report September 2024 (INV 10.03)

⁷ <https://www.hemelgardencommunities.co.uk/about-us/our-principles/>

⁸ <https://www.hemelgardencommunities.co.uk/our-vision/a-self-sustaining-economy/>

Issue 4 – Infrastructure Provision

- 1.31 12. *St Albans Local Plan Policy LG2 states that all development in the HGC Programme Area must follow a planned and coordinated approach to growth and infrastructure and is expected to be in accordance with Infrastructure Delivery Plans ('IDPs'). A similar requirement is set out in Dacorum Local Plan Policy HGC1.*

M6I4Q1 Is there sufficient certainty regarding the total quantum, timing and cost of infrastructure necessary to facilitate the HGC in line with the Councils' expectations?

- 1.32 No, there has not been a sufficiently thorough or holistic review of the quantum, timing and cost of infrastructure across the HGC scheme both within StADC (and DBC). The LIH/LAT Submissions¹ have detailed the identified multiple shortcomings with the current approach which are reiterated at M6I3Q1. The resultant policy gap on matters of timing and delivery of infrastructure, goes to the heart of the realism of the deliverer assumptions for this site.

M6I4Q2 Is there appropriate evidence as to how different forms of infrastructure (including schools and open space) have been apportioned to different HGC allocations?

- 1.33 No, LIH/LAT Submissions¹ show a lack of detail has been provided on deliverability and phasing considerations of the site, whether in its proposed constituent parts and/or as a whole, and therefore uncertainty as to how HGC will actually come forward and how the level of dwellings anticipated will be achieved.

M6I4Q3 What is the justification for requiring accordance with the IDP, which is a non-statutory document intended to be updated regularly by each Council?

- 1.34 The LIH/LAT Submissions¹ show that the IDP has inherent flaws contained within it and, as such, in requiring accordance with the flawed IDP is of concern. Moreover, simply requiring accordance with an iterative IDP should not be used as a substitute for robustly identifying the strategic infrastructure requirements for the HGC sites and specifying such on the face of the policy.

M6I4Q4 What is the purpose, role and function of the Transformation Supplementary Planning Document ('SPD') and the HGC Framework Plan? How do they relate to policies within each Plan?

- 1.35 No comment.

Issue 5 – Growth Area Principles

- 1.36 13. *St Albans Local Plan Policy LG3 and Dacorum Local Plan Policy HGC2 set out various elements of the '4 pillars' upon which the HGC concept is built, comprising 32 criteria, along with provisions in respect of delivery.*

M6I5Q1 Are those policies clearly written and unambiguous so it is evident how a decision-maker should react to development proposals? Are all elements directive in terms of decision-taking, and clear and effective?

- 1.37 No - clearer, more effective and detailed policies on matters such as triggers, are plainly required. The proposed policy is deficient in one key area – there is no reference to the need to ensure delivery of housing in line with the Trajectory at Table 3.2 of the Local Plan. Policy LG3 should be amended to include (or linked to) mechanisms for monitoring, review and remedial action being needed in decision making, should aspirations on delivery not be achieved.

M6I5Q2 Are Policies LG3 and HGC2 suitably flexible so as to apply only to relevant types of development?

- 1.38 No for the reasons set out at M6I3Q1, M6I3Q3 and M6I5Q1.

M6I5Q3 What is the justification for requiring compliance with 'future HGC guidance' in Policy LG3/HGC2? Is this clear, justified and effective?

- 1.39 In our view, no or no sufficient justification has been provided by the Council for requiring compliance with future HGC guidance and it is unclear to us how this is clear, justified or effective.

Issue 6 – Viability and Deliverability

M6I6Q1 Which of the sources of housing and employment land will contribute, and to what extent, towards anticipated delivery at HGC during the plan period and beyond?

- 1.40 The LIH/LAT Submissions¹ have shown significant concerns and failings in the housing Trajectory at Table 3.2 of the Plan. These concerns include a significant reduction in the stepped trajectory and a significant uptick in year 5 and a lack of detail on (in summary):

- The revised period for the Trajectory.
- The justification for windfall rate.
- The evidence base around assumed build out rates.

- the basis for the stepped delivery rates assumed and significant reduction between Regulation 18 to 19 assumptions.
- the 7-year period where the housing requirement of 885 dwellings per annum will not be met.

1.41 As at the time of drafting these MIQ responses, there is no updated Table 3.2 (or site specific) Trajectory to review, and we reserve the right to comment further on this when received.

14 To facilitate discussions around viability and deliverability, it would assist the examination if the Council could produce an updated trajectory for each individual site allocated at HGC.

M6I6Q2 The Delivery Statement supporting the St Albans Local Plan is dated November 2024 (Core Document HGC 02.01), whereas that supporting the Dacorum Local Plan is dated March 2025 (HGC01.02). What are the differences between the two documents (if any) and which is correct?

1.42 No comment.

M6I6Q3 Table 3.2 of the St Albans Local Plan envisages 100 houses completed at HGC in 2029/30, with development increasing thereafter up to 500 units per year. What are the lead-in times and build-out rates based on, and are they reasonable and realistic assumptions around deliverability?

1.43 The LIH/LAT Submissions¹ have highlighted substantial concerns and failings in the housing Trajectory at Table 3.2 of the Plan and questioned⁹ the delivery assumptions proposed for HGC. They have also highlighted a lack of tangible detail around the assumptions on matters such as, for example:

- Securing outline planning approval and completion of (complex) s106 agreement.
- Sale of land parcel, submission and approval of reserved matters details and discharge of relevant pre commencement conditions.
- Implementation.
- Construction of enabling works.
- Development of land parcels to deliver units.

M6I6Q4 How do the lead-in times and build-out rates take into account the need for necessary strategic infrastructure requirements, especially strategic highway improvements?

1.44 The LIH/LAT Submissions¹ set out the lack of detail provided on the deliverability, viability and the practical implications associated with HGC including, among other things:

- The large infrastructure requirements.
- The necessary social and community facilities to be delivered to accommodate the scale of the proposed development.
- The questionable ability to deliver the number and extent of dwellings proposed in the plan period.
- Ability to deliver housing numbers if infrastructure requirements are not delivered as anticipated.
- The ability to deliver the necessary SANG and Country Park provision.
- The questionable ability of the sites to deliver on the level and scale anticipated later in the proposed plan period¹⁰.

M6I6Q5 What are the implications for both Plans if HGC does not deliver at the rates expected? Should the Plans be modified to include additional flexibility, or a fallback position if HGC proposals are delayed?

1.45 The LIH/LAT Submissions¹ set out that suitable monitoring, review and fallback arrangements are needed in the Plan should delivery not take place as anticipated, including via the allocation of additional sites¹¹. This is particularly pertinent given the very low target of 485 dwellings per annum in the first 5-years of the proposed Trajectory at Table 3.2 of the Plan.

M6I6Q6 Has adequate viability testing been carried out to assess the cumulative costs associated with bringing forward the proposals at HGC? Are the component parts of the HGC viable, taking into account all likely costs, including strategic highways and infrastructure costs?

1.46 No, as detailed at M6I6Q1 – 5 above, insufficient detail has been provided by the Council on these (and other key matters) including (for present purposes) in relation to cumulative costs and delivery implications etc.

Issue 7 – North Hemel Hempstead (H1)

M6I7Q1 What is the site boundary based on and is it justified and effective? What is the justification for the area highlighted as excluded from the allocation?

1.47 No comment.

⁹ Paragraph 4.76 – 4.82 of LIH Regulation 19 Submission 'St Albans Technical Submission - Final Draft - 7th November 2024'

¹⁰ Paragraph 2.48 LIH Regulation 18 Submission Identified Sites Deliverability Assessment - FINAL Compressed Version-25th Sept 23

¹¹ Paragraph 4.97 – 4.102 of LIH Regulation 19 Submission 'St Albans Technical Submission - Final Draft - 7th November 2024'

M6I7Q2 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

1.48 It is unclear to us what the justification or approach has been to the application of the findings of the GBR 2023¹² in site selection resulting in an arbitrary approach being applied.

1.49 The HGC sites are listed (predominantly) as references SA-164, 165, 166, 167, 168, 170 and 172 in the GBR 2023:

GBR (2023) Site Reference	GBR (2023) Recommendation	StADC Plan draft Site Allocation Reference
SA-164	Not recommended for further consideration	H4
SA-165	Recommended for further consideration	H4
SA-166	Recommended for further consideration	H3
SA-167	Recommended for further consideration	H3
SA-168	Not recommended for further consideration	H2
SA-170	Not recommended for further consideration	H1
SA-171	Not recommended for further consideration	H2
SA-172	Not recommended for further consideration	H1

1.50 Some sites have been allocated because of the site selection process that were not recommended for further review in the GBR 2023 such as Sites H2, H1 and part of H4, whereas other sites (such as North East Redbourn) were immediately discounted without any clear justification or rationale provided. The process of interpretation and site selection based upon the findings of the GBR 2023, has been sporadic at best.

M6I7Q3 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

1.51 It is for StADC to demonstrate whether exceptional circumstances exist justifying amending the Green Belt boundary in this location.

M6I7Q4 How have the landscape impacts of the allocation been considered, having particular regard to the setting of the Chilterns National Landscape?

1.52 With regards to the National Landscape, this is for StADC and the site promoters to justify.

M6I7Q5 How have the mix of uses been established and how will development proposals come forward in a coordinated and coherent manner that achieves the aims and objectives of the wider HGC proposals?

1.53 The LIH/LAT Submissions¹ show questionable deliverability assumptions that have made in respect of HGC. It is unclear to us if the site can come forward comprehensively and cohesively. Insufficient detail has been provided in this regard. For example, Policy LG3 refers to using Compulsory Purchase powers but the land ownership and control position for the sites has not been clarified.

M6I7Q6 Can the allocation deliver the necessary mix of uses and supporting infrastructure? Is it developable within (and beyond) the plan period?

1.54 The LIH/LAT Submissions¹ highlight that it is unclear whether the mix or extent of assumed development and/or uses can be delivered as proposed within the plan period.

M6I7Q7 What effect will development have on the Chilterns Beechwoods Special Area of Conservation ('SAC') and how will any adverse impacts on the integrity of the site be avoided and/or mitigated?

1.55 With regards to the SAC, this is for StADC and the site promoters to justify.

M6I7Q8 Is Policy H1 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

1.56 The LIH/LAT Submissions¹ have shown that Policy H1 is neither justified, effective nor consistent with national planning policy due to (in summary) to:

- a lack of holistic assessment,
- an insufficient regard to delivery and viability considerations
- an insufficient mechanism for monitoring, review and fallback arrangements to ensure that housing requirements are met.

¹² St Albans GB Annex Report_20230612 FINAL ISSUE low res

- the need for additional site allocations to 'plug any gaps' should performance fall behind that assumed in the first 5-years (or subsequent years) of the Trajectory at Table 3.2 of the Plan.

Issue 8 – East Hemel Hempstead (North) – H2

M6I8Q1 What is the site boundary based on and is it justified and effective?

1.57 No comment.

M6I8Q2 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

1.58 See comments at M6I7Q2.

M6I8Q3 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

1.59 See comments at M6I7Q3.

M6I8Q4 How have the landscape impacts of the allocation been considered, having particular regard to the setting of the Chilterns National Landscape?

1.60 See comments at M6I7Q4. With regards to the National Landscape, this is for StADC and the site promoters to justify.

M6I8Q5 How have the mix of uses been established and how will development proposals come forward in a coordinated and coherent manner that achieves the aims and objectives of the wider HGC proposals?

1.61 See comments at M6I7Q5.

M6I8Q6 Can the allocation deliver the necessary mix of uses and supporting infrastructure? Is it developable within (and beyond) the plan period?

1.62 See comments at M6I7Q6.

M6I8Q7 What effect will development have on the Chilterns Beechwoods Special Area of Conservation ('SAC') and how will any adverse impacts on the integrity of the site be avoided and/or mitigated?

1.63 With regards to the SANG, this is for StADC and the site promoters to justify.

M6I8Q8 Is Policy H2 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

1.64 See comments at M6I7Q8.

Issue 9 – East Hemel Hempstead (Central) – H3

Site H3 is allocated as an 'employment led mixed use (Enterprise Zone)'. Unlike allocations H1, H2 and H4, allocation H3 does not specify a quantum or capacity of employment land, nor what proportion of the site is anticipated to be developed within the plan period.

M6I9Q1 What is the scale of development proposed, how has it been established and is the Plan clear and effective around the types of development permitted?

1.65 No comment.

M6I8Q2 How will development proposals come forward in a coordinated and coherent manner that achieves the aims and objectives of the HGC?

1.66 See comments at M6I7Q5, M6I7Q6 and M6I7Q8.

M6I9Q3 What is the justification for criterion 16 under Policy H3 which safeguards land to the east of Junction 8 of the M1? Does this form part of the allocated site, and if so, what are development proposals expected to do in order to achieve compliance with the policy?

1.67 See comments at M6I7Q8.

M6I9Q4 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

1.68 See comments at M6I7Q2, although it is noted that the H3 area was recommended for further review under the GBR 2023.

M6I9Q5 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

1.69 See comments at M6I7Q3.

M6I9Q6 How have the landscape impacts of the allocation been considered, having particular regard to the setting of the Chilterns National Landscape?

1.70 See comments at M6I7Q4. With regards to the National Landscape,, this is for StADC and the site promoters to justify.

M6I9Q7 What is the justification for criterion 29 and the requirements for contributions towards Strategic Access Management and Monitoring and the provision of Suitable Alternative Natural Greenspace?

1.71 No comment. With regards to the SANG, this is for StADC and the site promoters to justify.

M6I9Q8 What is the justification for the provision of accommodation to help meet the needs of gypsies and travellers on H3, and not all other sites within the HGC Programme Area?

1.72 No comment.

M6I9Q9 Is Policy H3 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

1.73 See comments at M6I7Q8.

Issue 10 – East Hemel Hempstead (South) – H4

M6I10Q1 What is the site boundary based on and is it justified and effective?

1.74 No comment.

M6I10Q2 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

1.75 See comments at M6I7Q2.

M6I10Q3 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

1.76 See comments at M6I7Q3.

M6I10Q4 How have the mix of uses been established and how will development proposals come forward in a coordinated and coherent manner that achieves the aims and objectives of the wider HGC proposals?

1.77 See comments at M6I7Q5.

M6I10Q5 Can the allocation deliver the necessary mix of uses and supporting infrastructure? Is it developable within (and beyond) the plan period?

1.78 See comments at M6I7Q6.

M6I10Q6 What is the justification for the proposed deliver rates and density assumptions on site H4, when compared to other parts of the HGC area?

1.79 See comments at M6I7Q5, M6I7Q6 and M6I7Q8.

M6I10Q7 What effect will development have on the Chilterns Beechwoods Special Area of Conservation ('SAC') and how will any adverse impacts on the integrity of the site be avoided and/or mitigated?

1.80 No comment. With regards to the SANG, this is for StADC and the site promoters to justify.

M6I10Q8 What is the justification for the provision of accommodation to help meet the needs of gypsies and travellers on H4, and not all other sites within the HGC Programme Area?

1.81 No comment.

M6I10Q9 Is Policy H4 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

1.82 See comments at M6I7Q8.

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