

ST ALBANS LOCAL PLAN EXAMINATION IN PUBLIC

STAGE 2 HEARINGS

Response to Matter 6: Hemel Garden Communities

Written Statement on behalf of Catesby Estates

September 2025

A First Floor, Hanover House
Queen Charlotte Street
Bristol, BS1 4EX
United Kingdom
T 0117 2033 628

W www.lda-design.co.uk

LDA Design Consulting Ltd
Registered No. 09312403
17 Minster Precincts, Peterborough, PE1 1XX

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Version: 0.1

1.0 Issue 1 – Justification for Strategic Growth

Question 4 – Having established the principle of growth at and around Hemel Hempstead, how was the scale of development determined?

The Council's response to the Inspector's Initial Questions 15-19 [SACD/ED35] states that "a Framework Plan has been developed through a public and private sector joint-working arrangement for Hemel Garden Communities (HGC), to test site capacity and site requirements and quantify and assess viability". This work tested capacity of the sites and any reasonable options to deliver up to 11,000 homes and it is anticipated that the Hemel Garden Communities Programme will deliver up to 4,300 homes across the plan period within St Albans District. It is through the Framework Plan process that the scale of development has been determined, and this has been treated as a constant figure in informing the draft St Albans Local Plan.

Nevertheless, it is our view that a Sustainability Appraisal of the reasonable growth options that includes different quantum of development at HGC has not been conducted by the Council to assess the likely significant effects of varying levels of growth in this part of the district. As such it has not been possible to make a comparison between the development options of additional development at St Albans against the benefits of high growth at HGC. This further exercise would also provide an assessment of what alternatives could come forward if HGC was to deliver fewer homes than anticipated in the Plan. An appropriate range of growth options has not been available as part of the plan-making process because the Council has regarded a fixed level of growth at HGC as a 'given'.

In addition to this, the Sustainability Appraisal, the Spatial Strategy and the determination of reasonable alternatives should have included options that look at a different distribution of growth across the district. We have previously made the point in our response to Matter 1, Issue 3 – Sustainability Appraisal, Question 5 [Hearing Statement 193] that there has been a lack of investigation of a reasonable alternative that looks to rebalance the distribution of growth between Hemel Hempstead and St Albans.

Section 5.5 of the Sustainability Appraisal Report (2024) combines the sub-area scenarios to form district-wide reasonable alternative growth scenarios. Paragraph 5.5.8 provides a discussion of omission sites that could have featured in several reasonable alternatives that compared a combination of HGC, North St Albans, East St Albans and Southeast St Albans that seek to balance the delivery of housing between Hemel Hempstead and St Albans. There is insufficient discussion of reasonable alternative growth options at St Albans versus HGC, and it is not clear why omission sites have not been considered. In the site selection process, our client's site (Land at Windridge Farm) was considered to offer several opportunities to deliver both social and environmental benefits for the new and existing community, with its proximity to HGC being the only negative commentary within the discussions in section 5.4. Further investigation of a wider range of reasonable alternative growth scenarios would have improved the robustness of the Sustainability Appraisal and provide a clearer evidential basis for an appropriate scale of development being proposed at HGC.

Even if it could be justified that it was appropriate to treat HGCs as a constant allocation in the SA, the approach taken to identify other reasonable alternative growth options has not provided options that are sufficiently distinct and that highlight the different sustainability implications of providing more homes at St Albans (a Tier 1 settlement) and fewer homes at HGC, in the event that the site does not come forward in timescales / quantum's envisioned. This is not unrealistic given the complexity of the site. This has constrained the ability of the Sustainability Appraisal to make a meaningful comparison between growth options, it is not compliant with paragraph 018 of the NPPF (Reference ID: 11-018-20140306), it means that the SA has not contributed to the determination of the scale of growth at HGC and is thus not compliant with the scope and purpose of SA set out in PPG.

Question 5 - How did factors such as the Green Belt and proximity of the Chilterns National Landscape inform decisions around growth at Hemel Hempstead?

The St Albans District Council Green Belt Review Report (2023) [GB 02.02] provides the result of the Stage 2 Green Belt Review, and the contribution of land parcels at East Hemel to the five NPPF purposes of the Green Belt. The outcome of the assessment is a set of recommendations for which land parcels are to be further considered in the site selection process. The Green Belt Review Annex Proforma Report (2023) [GB 02.03] provides the detailed assessment of individual sub-areas as well as an assessment of the wider Green Belt impacts to the strategic land parcel.

Hemel Garden Communities consists of 12 sub-areas, all of which have been assessed as making a strong contribution to the five NPPF purposes of the Green Belt, with the exception of parcel SA-166 which makes a moderate contribution. It was also concluded that 50% of the sub-areas were considered to perform an important strategic role. This is consistent with the results of the assessment of sub-areas on the urban edge of St Albans, however the qualitative assessment in the Green Belt Review Annex Proforma Report (2023) [GB.03] provides commentary which sets out the major contribution that the sites make to keeping settlements separate across the eastern side of the district.

The Report states that 'In combination with other sub-areas in the wider cluster in which the sub-area is located (i.e. SA-163, SA-164, SA-166, SA-167, SA-168, SA-169a, SA-169b, SA-170, SA-171 and SA-172), the removal of the sub-area would lead to large-scale unchecked sprawl of Hemel Hempstead, and significantly reduce the gap between Hemel Hempstead and both Redbourn and St Albans'.

In comparison, although Land at Windridge Farm has been assessed as contributing to maintaining a gap between St Albans and Chiswell Green, it is stated that the "presence of the A414/North Orbital Road between these settlements contributes to preventing their physical and perceptual connection" and that there is "some scope for development without significant physical or perceptual erosion of the gap between neighbourhood built-up areas".

There is a lack of evidence to demonstrate how the commentary contained within the Green Belt Review Annex Proforma Report has contributed to the proposed allocation of a certain scale of growth at Hemel Hempstead and whether these assessments have contributed to the mitigation proposed along the new Green Belt boundaries that will be created by development coming forward.

In addition to the St Albans Green Belt Review on East Hemel Hempstead, the Dacorum Stage 2 Green Belt Review concluded that the sub-areas of North Hemel Hempstead contributed strongly to purpose 3 to protect the openness of the countryside and provided a moderate contribution to purposes 1(b) and 2. This throws into question how these assessments have been considered throughout the development of the Framework Plan and have influenced the proposed scale of growth at HGC.

2.0 Issue 3 – Highways and Transport

Question 2 – What are the implications of the growth proposed at HGC on the strategic road network, having particular regard to Junction 8 of the M1?

The Council submitted a significant number of additional documents relating to transport modelling and highways improvements to the examination following the Stage 1 hearing sessions back in April, in order to clarify the highways infrastructure interventions that are required to accommodate the identified increase in traffic pressure on parts of the network as a result of Hemel Garden Communities. It is identified in the HGC Trigger Point Technical Note [SADC/76A.i], published to the examination in May 2025, that ‘at least half of the HGC development can come forward without the need to for further change to M1 Junction 8’.

The Joint Comet Run Addendum Hemel Garden Community Comet Test [SADC/ED76B.i] which was published to the examination in July 2025 identifies that the upgrades to M1 Junction 8, which consist of widening the circulatory carriageway to two lanes, can accommodate the growth in the 2050 Vision and Validate scenario, which includes the Dacorum and St Albans Local Plan Allocations. There is a recognition at paragraph 8.2.4 that a detailed analysis of nine key junctions around the M1 Junction 8 indicates that within the Vision and Validate scenario there are generally increased traffic flows and delays. In some instances, this includes an increase in journey times during the AM peak of between 3-77%, however there is a notable reduction in journey times during the PM peak.

The most recent transport modelling shows the implications of HGC on M1 Junction 8 and associated junctions are that it increases journey times and delays without further highway interventions. It is not clear from the evidence submitted to the examination whether the increased number of highways improvements schemes that need to be implemented to accommodate the growth at HGC have been incorporated into the most recent viability testing for the site.

In addition to the point around viability, there is the additional point that links to our response to Issue 1, Question 4 above as to whether there were other reasonable alternative growth scenarios that should have been tested in the sustainability appraisal, that may align further with public transport routes and walking and cycling improvements within the LCWIP and reduce the number of journeys being made by private car that justify a redistribution of growth to other settlements in the hierarchy.

Furthermore, the assessment of different distributions of growth and scales of growth between other locations and HGC through the sustainability appraisal should have assessed whether alternative distributions would have resulted in fewer highways upgrades to make it acceptable. There is a question of whether a different distribution of growth could facilitate additional improvements to the walking and cycling network.

Question 7 – 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?

The new evidence submitted to the examination in July includes an assessment of modal shift away from the use of private car. The Joint Comet Run Addendum Hemel Garden Community Comet Test (June 2025) summarises the result of the assessment of passenger usage of the proposed Hertfordshire Rapid Transport route between St Albans station and Hemel Hempstead Station.

The findings of the report that “the public transport usage presented reflects the public transport demand forecast by the Demand Model which is likely to be generating a lower public trip rate by dwelling compared to that predicted by the Hemel Garden Community developer” and that “a further assessment which uplifts the public transport demand in line with the HGC trip generation report could be undertaken to fully understand the potential usage of the proposals if the mode share is achieved as predicted by the developer”. This suggests that public transport usage may not occur as significantly as predicted.

It is outlined that the highest boardings occur at St Albans City Station during the peak AM period. St Albans Abbey Station was also a notable boarding point. These notable boarding points are all at St Albans and are in the centre/south of the City. The location of HGC to the east of Hemel Hempstead could have a negative impact on the likelihood of passengers using the HERT to travel around this part of the district. Further development at St Albans may increase passenger usage as this will encourage journeys to the employment locations on the east of Hemel Hempstead and to St Albans Abbey Station, which has a direct link to Watford, a major employment location in the region.

Windridge Farm is located along the A414 and is just 1.33km southwest of St Albans Abbey Station and on the proposed HERT route. Development at Windridge Farm would provide a great opportunity to increase growth at St Albans and make more effective use of this transport corridor, providing sustainable modes of travel to desirable employment locations within and between St Albans and Hemel Hempstead.

3.0 Issue 6 – Viability and Deliverability

Question 5 - 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?

As we have explained, there has been insufficient testing of reasonable development alternatives that do not rely on delivering HGC to provide the majority of the district's housing needs. The SA focuses on three omission sites which are tested in different growth scenarios, but it fails to consider whether it would be appropriate to introduce a reserve or omission site policy that would give greater certainty that housing needs will be met throughout the plan period. There is also no evidence considered or discussion of the implications of the HGC not delivering at the rates expected.

The housing trajectory requires HGC and the Broad Locations to begin delivering housing in years 6-10 of the plan period to ensure that the stepped approach is achievable, even though that in itself is unsatisfactory and inadequate. Due to the uncertainty over the achievement of the big 'step-up' in delivery in years 6-10 of the plan period, the Council should be preparing a fallback position so that there is a policy in the Plan to prevent under delivery by providing a mechanism for the industry to fill a gap in delivery should HGC, Broad Locations and Large sites take longer than anticipated to come forward, as well as supplementing the meagre delivery of housing in the first five years.

An example of such a policy is in the Vale of Aylesbury Local Plan 2013 - 2033¹(VALP), Policy D3 "proposals for non-allocated sites at strategic settlements, larger villages and medium villages", which states that large scale development "will be permitted where the council's monitoring of housing delivery across Aylesbury Vale shows that the allocated sites are not being delivered at the anticipated rate. Proposals will need to be accompanied by evidence demonstrating how the site can be delivered in a timely manner". The policy sets out criteria which proposals must fulfil to be acceptable.

¹ [Vale of Aylesbury Local Plan \(VALP\)](#)