

Redbourn Parish Council
Matter 6 – Hemel Garden Communities

ISSUE 1 – Justification for Strategic Growth

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.

Housing

- Q1. 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?**

RPC Response:

This for SACDC to respond to.

- Q2. 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?**

RPC Response:

Yes. For Hemel Garden Communities to be effective as a strategic growth location, both the St Albans and Dacorum Local Plans should include, within policy, a clear and coordinated breakdown of the component parts of HGC, setting out what is expected from each parcel.

While the St Albans Local Plan does allocate sites within HGC, with indicative housing numbers, employment floorspace and facility requirements, the Plan does not present the whole picture of deliverability across the HGC area. The absence of an integrated, cross-boundary framework risks piecemeal development, uncertainty around infrastructure delivery, and ultimately undermines the effectiveness of the strategy.

In terms of the NPPF, inclusion of a parcel-level breakdown of the Hemel Garden Communities in policy is necessary to ensure the Local Plans are “effective” (para. 35) and deliverable over the plan period, to provide a clear long-term vision for large-scale development (para. 22), and to demonstrate realistic housing trajectories and infrastructure delivery (para. 73); embedding these expectations in policy creates certainty, accountability, and a coordinated framework across both districts, which cannot be achieved through guidance or supporting text alone.

Q3. 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?

RPC Response:

This for SACDC to respond to.

Spencer's Park lies to the west of the East Hemel North East site and other than a link road joining the two sites, very little has been done to integrate the two developments. The timetable for development of HGC needs to include this and the other sites. Our understanding is that the Spencer's Park development is on hold as an acceptable SANG cannot be found.

Q4. Having established the principle of growth at and around Hemel Hempstead, how was the scale of development determined?

RPC Response:

This for SACDC to respond to.

As RPC understands it, the scale of development was determined simply by the need for housing with over a third of the SADC Local Plan's housing number proposed at HGC.

Q5. How did factors such as the Green Belt and proximity of the Chilterns National Landscape inform decisions around growth at Hemel Hempstead?

RPC Response:

Whilst a Green Belt Review (2023) has been undertaken, it is entirely unclear how this has informed decisions in the Local Plan.

The Green Belt Review makes clear that the land at Hemel Hempstead performs strongly against the purposes of the Green Belt, and that release of land, or sub-areas within it, either in isolation or combination, would cause harm to the Green Belt. The Green Belt Review states that the land is 'not recommended for further consideration'. The allocation of land at Hemel Hempstead disregards the Green Belt Review and thus conflicts with the approach set out in the NPPF.

It is not clear how proximity to the National Landscape has informed decisions.

The Landscape Assessment does not consider the visual sensitivity of the development area, and thus the impact of it on the setting of the National Landscape. Equally, it is not clear how the proposed landscape mitigations (e.g.: screening) respond to the character of the wider landscape. The NPPF requires

development in the setting of a National landscape to be sensitively located and designed to avoid and minimise adverse impacts. This does not appear to have been fed through into the proposals for HGC, and neither is it adequately reflected in proposed Local Plan Policy NEB11 which simply states development should not have an impact on the National Landscape. The Policy should seek to avoid harm and plan positively for the National Landscape.

ISSUE 2 – Site Boundaries (including Green Belt Alterations)

- Q1. 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?**

RPC Response:

This for SACDC to respond to.

- Q2. How do the proposed boundary alterations relate to the supporting evidence through the Green Belt Assessments and site selection methodology?**

RPC Response:

Please see our response in Issue 1 (and in Issues 7 – 9). The evidence, as presented in the Green Belt Review(s), does not support release of land from the Green Belt. It has not demonstrated that all reasonable options for meeting the identified need for housing have been fully explored before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries. The Green Belt Review does not recommend that land should be released from the Green Belt. In essence, it appears that the findings of the Green Belt Review have simply been disregarded.

- Q3. 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?**

RPC Response:

In respect of paragraph 148(f), the proposal raises significant concerns. The policy and supporting material do not currently identify physical features that clearly and permanently define the new Green Belt boundary. The only existing elements along the proposed line are electricity pylons, which do not constitute a readily recognisable or locally meaningful feature at ground level. While pylons are visible structures, their thin overhead cables are insubstantial in the landscape and do not provide a likely permanent or clearly perceptible delineation of the boundary.

Moreover, the detailed design of HGC is not yet determined, meaning that the final layout, street patterns, and open space arrangements could further compromise the clarity and permanence of the boundary. Without well-defined, permanent physical features, such as hedgerows, tree lines, watercourses, or

roads, the boundary risks being unclear on the ground and potentially subject to future alteration. As such, the Local Plan and its supporting evidence do not provide sufficient assurance that the boundary will be both clearly recognisable and permanent, and therefore, do not fully comply with paragraph 148(f) of the NPPF (December 2023 – now para 149 in the December 2024 NPPF).

This is particularly important because one of the core purposes of Green Belt policy is to provide enduring restraint on urban sprawl. A boundary lacking clear and permanent markers undermines the very function of the Green Belt, potentially leading to uncertainty for landowners, developers, and local communities, and may result in pressure for changes before the end of the Plan period.

ISSUE 3 – Highways and Transport

- Q1. 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?**

RPC Response:

No it is not appropriate - RPC has responded to this in detail in its representations to the Additional Documents Consultation (July-August 2025) as well as its previous hearing statements and Regulation 19 representations and we continue to rely on these here.

- Q2. What are the implications of the growth proposed at HGC on the strategic road network, having particular regard to Junction 8 of the M1?**

RPC Response:

Whilst access to the Maylands Industrial Area and East Hemel Central has been considered, there are no roads linking junction 8 with the new housing in the North / North East of Hemel. See above.

- Q3. 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?**

RPC Response:

As we have set out in our previous submissions the 'Critical' transport infrastructure required to unlock growth at HGC as defined in the Infrastructure Delivery Plan (IDP) and associated IDS are lacking necessary evidence and assumptions. The IDP provides an *"inexhaustive list of planned highways infrastructure projects, as included in the St Albans IDP Infrastructure Schedule, of most relevance to the Hemel Garden Communities"*. It then provides two bullet points which are:

- M1 junction 8 enhancement (Phases 1 to 3)
- Access enhancements to support development at Hemel Garden Communities

When looking for the estimated costs there is no estimation despite it being a Critical piece of transport infrastructure. Furthermore, the time period for its delivery is stated as 2025 – 2041. That is a very wide period of time which indicates that SACDC simply does not know the cost or when it is likely to be delivered let alone what development will trigger its necessity for delivery.

- Q4. 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?**

RPC Response:

As explained above, the evidence does not exist to support this even if it were to be referred to in the Local Plan.

- Q5. 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?**

RPC Response:

Different documents over the years have suggested 8,000 and 10,000 new jobs at East Hemel Hempstead (Central). Both figures seem unrealistic to RPC. The original figure of 3,000 jobs seems more reasonable.

- Q6. 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?**

RPC Response:

We would like to point out that the area is already congested at peak times. When the M1 is very busy, the traffic around Redbourn and Hemel often grinds to a halt as vehicles attempt to find rat-runs between junction 8 and 9 (particularly Cherry Tree Lane which runs north/south to the east of Hemel).

- Q7. 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?**

RPC Response:

The evidence submitted for examination did not sufficiently consider the impacts of growth and how modal shift can be achieved. Indeed, the IDP simply refers to the need for 'further details' (in respect of rail services) and 'initial investigations' with developers having been undertaken in respect of bus services. The package of walking and cycling infrastructure to be delivered as part of the scheme is incomplete. In short, it is entirely unclear what sustainable transport options will be delivered, and when, and how this will support sustainable patterns of growth.

HGC relies heavily on modal shift, and there is lack of private parking and roads. However, it is unlikely that modal shift will be achieved in the plan period. HGC could be described as a 'modal shift experiment', but it cannot work in isolation.

The larger area also needs to restrict private vehicle use, and that will take a considerable time to achieve.

ISSUE 4 – Infrastructure Provision

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.

Q1. Is there sufficient certainty regarding the total quantum, timing and cost of infrastructure necessary to facilitate the HGC in line with the Councils' expectations?

RPC Response:

In short, 'no'.

The IDP states that there could be cross boundary issues with the supply of potable water and that no modelling has been done on the need for a new water supply network. In terms of wastewater, the IDP simply states that there will be a need for new infrastructure for significant greenfield urban extensions, but does not include any assessments of what the wastewater requirements are for the growth area, where it will be located, when the need for it will be triggered, and how it will be paid for. This is a significant omission.

In terms of utilities, the growth area is crossed by various pipelines and transmission lines. It is unclear how these are accounted for in the allocation, and their impact on the overall scale of development that it might be possible to accommodate on site. These are potential 'showstoppers' to development.

Q2. Is there appropriate evidence as to how different forms of infrastructure (including schools and open space) have been apportioned to different HGC allocations?

RPC Response:

We are not aware of any such evidence.

Q3. What is the justification for requiring accordance with the IDP, which is a non-statutory document intended to be updated regularly by each Council?

RPC Response:

This for SACDC to respond to.

Q4. 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?

RPC Response:

This for SACDC to respond to.

ISSUE 5 – Growth Area Principles

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.

Q1. 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?

RPC Response:

Policy LG3 sets out the Place Principles for Hemel Garden Communities across four Pillars and provides comprehensive guidance on design, infrastructure, and community outcomes.

While some elements are directive, such as requirements for a landscape-led masterplan, demonstration of on-site infrastructure delivery, and submission of a detailed phasing strategy, many other elements are aspirational (e.g.: development "should" deliver biodiversity net gain, integrated neighbourhoods, active travel targets, and high-quality public realm).

As a result, the policy is not entirely clear and, for decisions making purposes, does not meet the requirements in NPPD para 16(d) to be unambiguous: it is not always evident which requirements are mandatory and which are advisory. This is likely to create uncertainty for developers and decision-makers and risks inconsistent application.

To be fully effective and compliant with the NPPF, LG3 should more clearly distinguish between binding, enforceable requirements and strategic or aspirational objectives, ensuring clarity and certainty in the assessment of development proposals.

Q2. Are Policies LG3 and HGC2 suitably flexible so as to apply only to relevant types of development?

RPC Response:

Policy LG3 applies to all development within the Hemel Garden Communities Growth Areas but does not explicitly differentiate between different scales or types of development. Many of its requirements, such as delivery of strategic transport infrastructure, achieving mode share targets, and provision of neighbourhood centres, are clearly aimed at major, strategic proposals.

However, the policy's language does not formally exempt smaller-scale or minor development from these obligations. Introducing triggers or thresholds could

help ensure that specific requirements apply only when development reaches a scale, type, or location where they are relevant.

As drafted, LG3 risks being applied rigidly to development proposals where certain requirements may not be proportionate, potentially creating an unnecessary burden and reducing the policy's effectiveness. While LG3 sets a clear strategic vision for HGC, it lacks explicit flexibility to differentiate between strategic, medium, and minor proposals within Hemel Garden Communities Growth Areas, which could lead to uncertainty for decision-makers and applicants regarding which elements are applicable to a given proposal.

In conclusion, LG3 would benefit from clearer guidance and the use of thresholds or triggers to ensure that only relevant types and scales of development are expected to comply with specific elements, thereby maintaining proportionality and effectiveness.

Q3. What is the justification for requiring compliance with 'future HGC guidance' in Policy LG3/HGC2? Is this clear, justified and effective?

RPC Response:

This is for SACDC to respond to in terms of justification. Currently it is not considered to be clear, justified or effective.

ISSUE 6 – Viability and Deliverability

- Q1. 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?**

RPC Response:

This for SACDC to respond to, as already set out it is currently unclear from the IDP and other evidence base.

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.

- Q2. 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?**

RPC Response:

This for SACDC to respond to.

- Q3. 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 16 year. What are the lead-in times and build-out rates based on, and are they reasonable and realistic assumptions around deliverability?**

RPC Response:

The assumed delivery rates are entirely unrealistic. They do not reflect the reality of development on large sites, with build-out rates between 100 to 188 units per year being more realistic, as based upon research published by Lichfield's. Other than year 1 and 2 of the delivery programme, all build-out rates envisaged in the Local Plan significantly exceed those in the Lichfield's research. There is a very real risk that build-out rates for the Garden Community will not be achieved, undermining delivery of the Garden Community and indeed the Local Plan as a whole.

- Q4. How do the lead-in times and build-out rates take into account the need for necessary strategic infrastructure requirements, especially strategic highway improvements?**

RPC Response:

It is not clear that they do. Highway access to support development, including transport measures as part of the M1 Junction 8 enhancements, are identified in

the IDS as critical infrastructure items, and thus essential to delivery of the growth area. However, the IDS simply states that the period for delivery of these items is 2025 – 2041. No costs are provided, nor any commentary on the scale of development that would trigger the need for the infrastructure items. There is no certainty as to when the infrastructure will be delivered and what this means for the scale of development that can come forward ahead of delivery.

- Q5. 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?**

RPC Response:

The HGC project is very ambitious and not fully evidenced, therefore there must be some contingency plans. The availability of builders, materials and ‘flooding the housing market’ should also be taken into serious consideration.

- Q6. 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?**

RPC Response:

It is currently unclear how the Local Plan Policies, the IDP / IDS and the Local Plan Viability Assessment (September 2024) relate to one another. The information contained in each of these documents is not clearly set out anywhere for each allocation at HGC in terms of the infrastructure requirements, their costs, when it is necessary, and who will be delivering it.

When one attempts to reconcile the cost assumptions in the Viability Assessment with the IDP / IDS it is not possible to do so.

It is unclear in the viability evidence how cross-boundary infrastructure is being calculated. When one reviews the Hemel Garden Communities Delivery Statement (September 2024) there are a range of cross boundary schemes that are ‘key transformational projects’ (see below). How are these being treated in the viability evidence base?

The Local Plan states that

“The Spatial Vision for Hemel Garden Communities sets out the scope for transformation across the town, as well as providing a sustainable approach for growth, in accordance with the [Town and Country Planning Association \(TCPA\) Garden City Principles](#)”

We question how the TCPA Garden City Principles are taken into account in the viability evidence. For example:

- Land value capture for the benefit of the community
- Community ownership of land and long-term stewardship of assets

Furthermore, we are unclear as to how the viability evidence has taken account of all the requirements of the Local Plan Policies including Policy LG3 (Hemel Garden Communities Growth Area Place Principles). This policy includes a number of requirements for the developers, and it is unclear how these have been costed.

Policy LG6 (Green Belt Compensatory Improvements) requires that the allocations in the Local Plan where Green Belt boundaries are changed that 'proportionate' compensation is required. What assumptions have been made about this in the viability evidence base as this is clearly a costly requirement for Green Belt release allocations particularly at Hemel Hempstead?