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North Hemel Hempstead

Statement in Response
to Inspector's Matters,
Issues & Questions

Matter 6 – Issue 7

SEPTEMBER 2025

Q100390

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1 Introduction

- 1.1 This Statement is submitted on behalf of Pigeon (Hemel Hempstead) Ltd (“Pigeon”) and Bloor Homes (“Bloor”) in response to Matter 6 – Hemel Garden Communities (“HGC”), Issue 7 – North Hemel Hempstead (H1) of the Inspectors’ Matters, Issues and Questions for Stage 2 of the St Albans City & District Council (“SADC”) Local Plan Examination.
- 1.2 This Statement follows on from previous representations, which were submitted by Pigeon and Bloor throughout the plan-making process, most recently, Regulation 19 Representations in 2024.
- 1.3 Pigeon and Bloor control the majority of the land within Draft Site Allocation H1 – North Hemel Hempstead Broad Location that forms part of the emerging HGC as identified in the SADC Draft Local Plan 2041 Regulation 19 Publication (September 2024)¹. This Site Allocation has been determined following a detailed site selection process documented in the Housing and Economic Land Availability Assessment² (“HELAA”) (2021) and Green Belt Review (“GBR”) Stage 2 (2023)³.
- 1.4 Since the Regulation 19 Publication, a minor modification has been made to the Draft Site Allocation H1 application boundary to exclude a small area of land that did not fall under the Pigeon and Bloor’s ownership, north of Little Revel End Farm. This minor amendment was necessary to ensure the deliverability of the Site and will be assessed as part of the Draft Local Plan Examination. The updated Draft Site Allocation boundary, measuring approximately 154 ha, is shown in **Figure 1-1** below. The Land Ownership Plan is shown in **Figure 1-2** below with the area under Bloor’s control outlined in green, and the area under Pigeon’s control outlined in Blue.
- 1.5 Pigeon and Bloor jointly are preparing a planning application for the residential development of 1,500 dwellings (indicative), along with the delivery of a mixed-use local centre, a primary school, care facilities, flexible non-residential uses, areas of play, sport and leisure, allotments and areas of open space. The site application boundary (**Figure 2-1**) measures approximately 103 ha. The planning application is due to be submitted to SADC in Q4 2025.

¹ St Albans City & District Council – [Draft Local Plan 2041 Regulation 19 Publication Part B](#) (September 2024)

² St Albans City & District Council - [Housing and Economic Land Availability Assessment](#) (2021)

³ Arup – [St Albans Stage 2 Green Belt Review](#) (June 2023)

Figure 1-1: Draft Site Allocation H1 - North Hemel Hempstead - Site Allocation Boundary

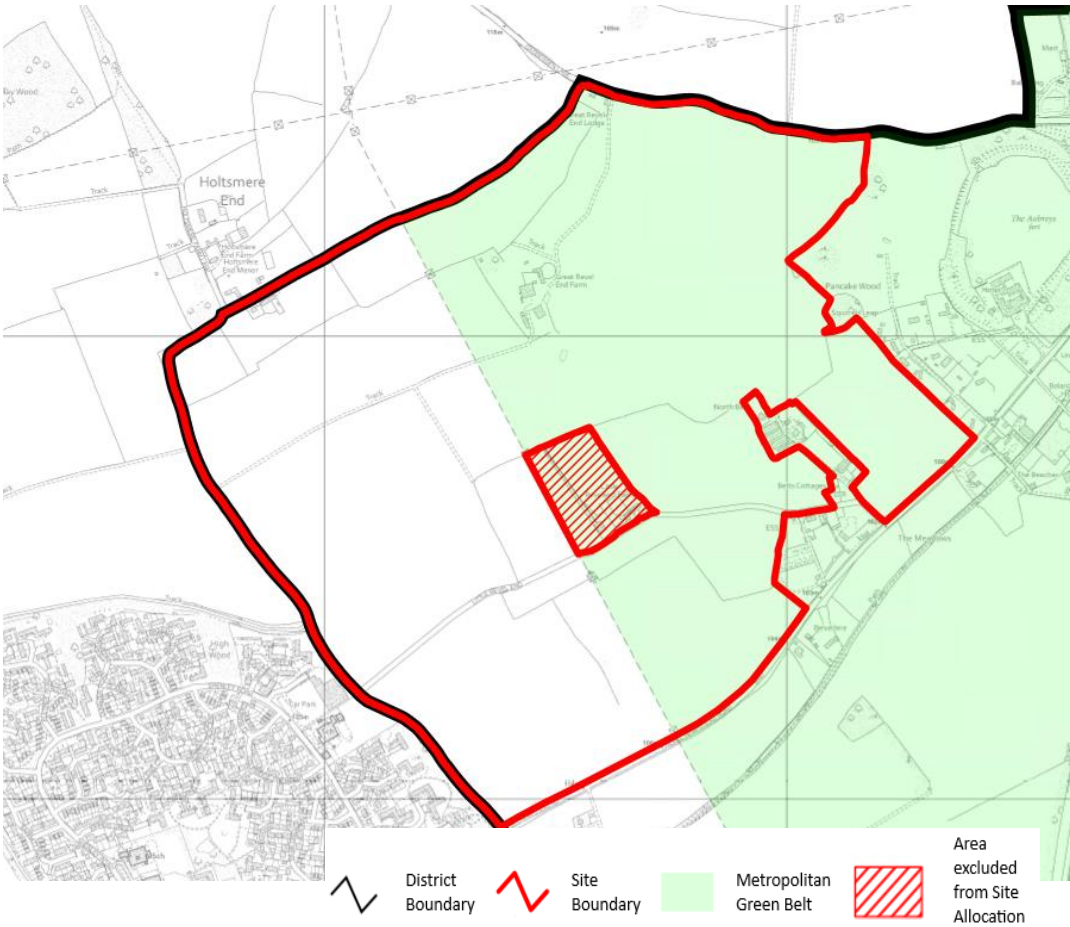
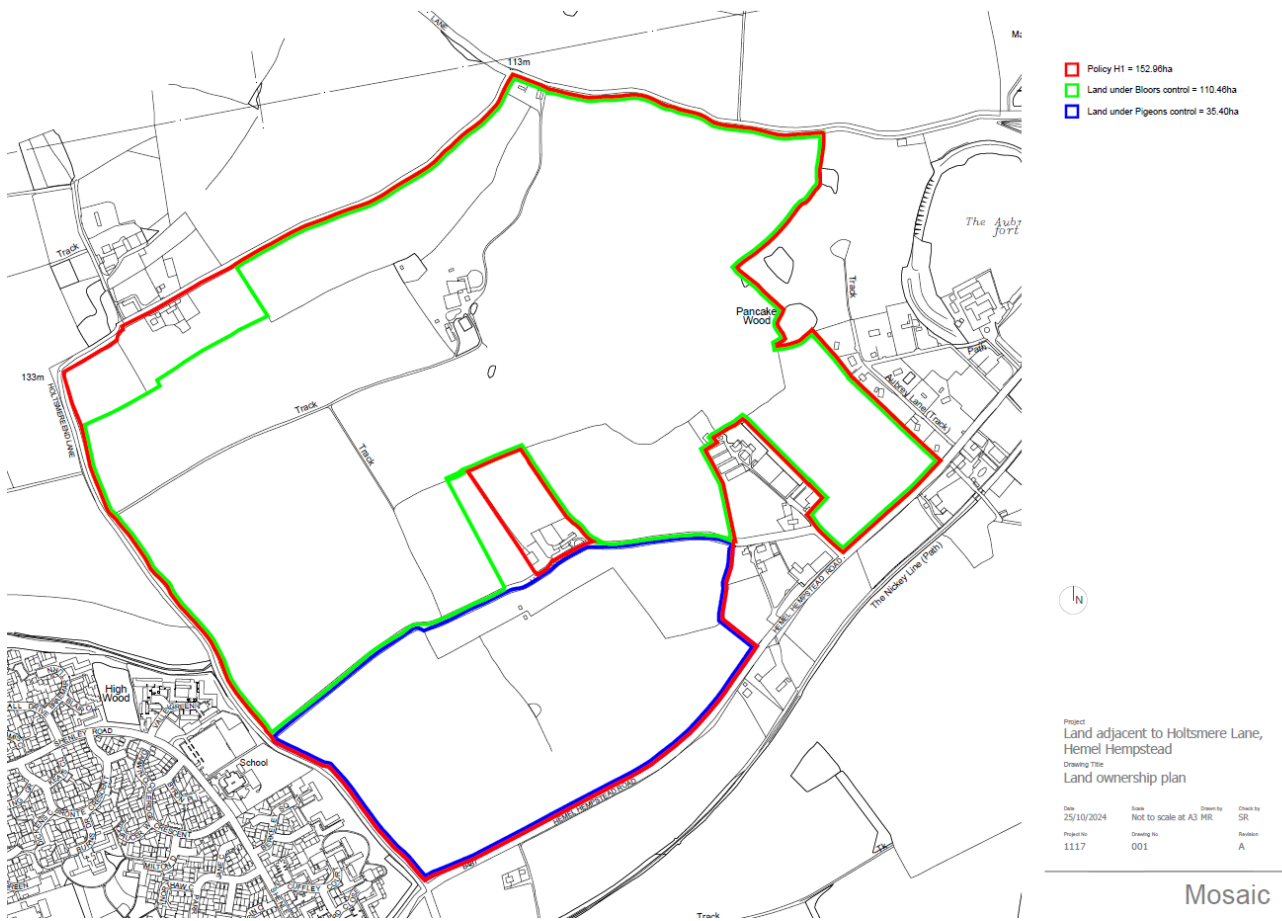


Figure 1-2: Land Ownership Plan



2 Matter 6, Issue 7 - North Hemel Hempstead (H1)

Q1. 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?

- 2.1 The Draft Site Allocation has been proposed following a detailed site selection process as part of the HELAA (2021) following a Call for Sites. The assessment methodology for the HELAA focused on the development potential, suitability in terms of the site being in an appropriate location, availability in terms of land ownership not preventing development, achievability in relation to viability and deliverability within a certain time period, and the potential to overcome any constraints of the Site.
- 2.2 The site's general location is important as it is immediately adjacent to Hemel Hempstead, a highly sustainable location, and plays a critical role in ensuring the coherence and connectivity of the Hemel Hempstead Garden Community.
- 2.3 The B487 marks the southern boundary of the Draft Site Allocation and Holtsmere End Lane forms the north and west boundary. The eastern boundary of the site extends to Gaddesden Lane, however, the majority of the eastern area is proposed to be retained in the Green Belt, with built development proposed on the western area of the site, adjacent to the existing settlement of Hemel Hempstead. This maintains a green buffer to Redbourn.
- 2.4 Assessment of Draft Site Allocation H1 (HELAA Ref: R-05-18) determined that the Draft Site Allocation could provide significant economic, environmental and social benefits within its boundaries, as well as support the delivery of the Hemel Garden Communities ("HGC") programme, for which broad 'Growth Areas' were established in the HGC bid to Government in 2018. Following the HELAA establishing the Site's suitability for development, it was adopted as a Draft Site Allocation within the SADC Draft Local Plan Regulation 19 Publication in September 2024⁴.
- 2.5 The Draft Allocation's Site boundary has been developed through the draft Hemel Garden Community Framework Plan – Evidence Base Report⁵ ("EBR"), published in September 2024 and its accompanying documents, and through discussions with the landowners within HGC. It has also been tested through the pre-application process for the planning application. Further details of the pre-application process are outlined at question 6.
- 2.6 The EBR sets out the evidence base for SADC and Dacorum Borough Council's ("DBC") Draft Local Plans in relation to the delivery of HGC. The EBR looks at the delivery of HGC as a whole, focusing on how the different sites will integrate with one another, and sets out the desired principles of the development.

⁴ St Albans City & District Council – [Draft Local Plan 2041 Regulation 19 Publication Part B](#) (September 2024)

⁵ Hemel Garden Communities - [Framework Plan Evidence Base Report](#) (September 2024)

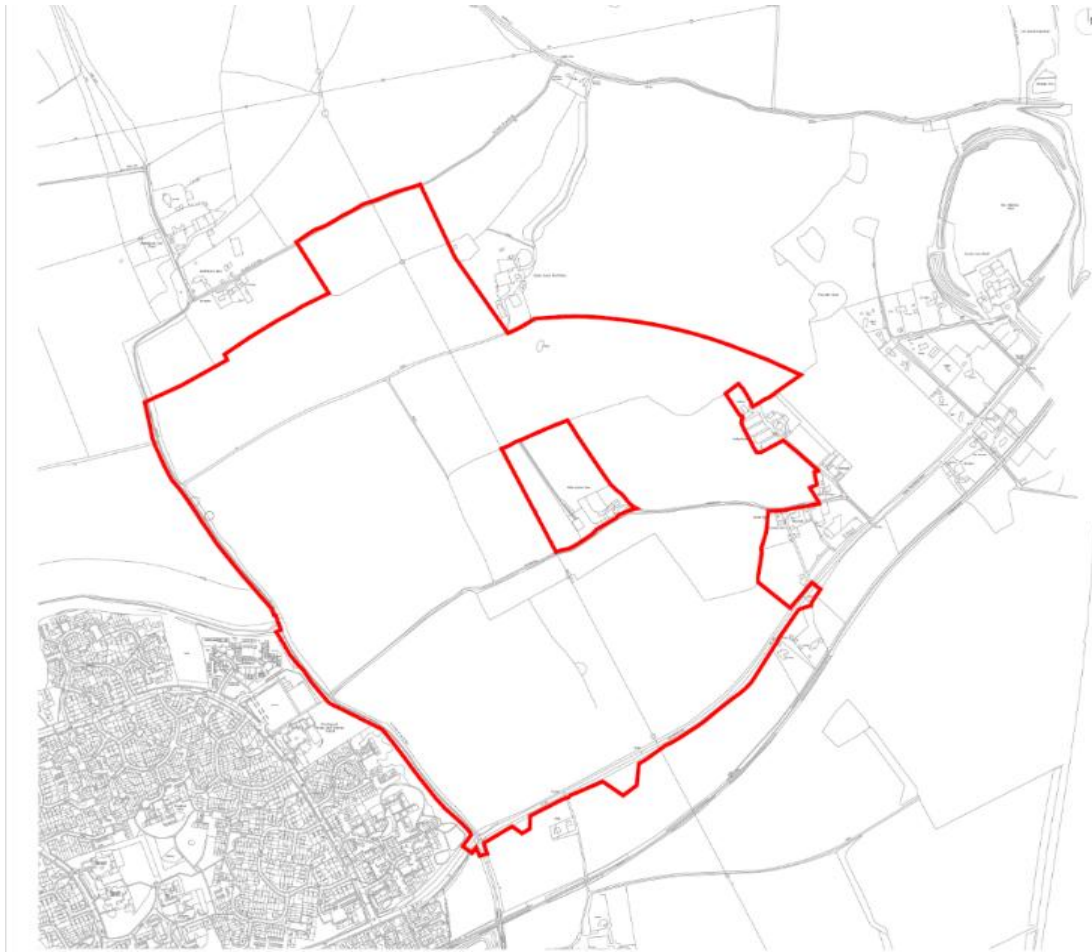
- 2.7 A Broad Locations Landscape and Visual Appraisal⁶ (2024) and a North Hemel Hempstead Landscape Study⁷ (“NHHLA”) (2024) supporting DBC and SADC Local Plans considered, from a landscape and visual perspective, the potential for development at the Draft Site Allocation and recommended a development extent, potential landscape structure and refined Green Belt boundary that informed the Draft Site Allocation boundary.
- 2.8 The EBR’s high-level concept plans and requirements of the wider HGC development have been used to inform the master planning of the development proposals within the Site Allocation boundary. Recent master planning work, linked to the emerging planning application being prepared by Bloor and Pigeon, has been carried out across eight pre-application meetings with SADC between February 2025 and August 2025, as well as two Design Review Panels held on 14th May 2025 and 24th September 2025. Across the pre-application meetings and Design Review Panels, the master planning work has developed from an initial broad vision concept to an illustrative masterplan for the Site.
- 2.9 Testing of the illustrative masterplan in collaboration with SADC, DBC and Hertfordshire County Council, and other stakeholders, has provided confidence that the masterplan can be brought forward in a manner consistent with draft Policy within the area controlled by Bloor and Pigeon. As a result, the proposed application boundary is smaller than the Draft Site Allocation boundary. The illustrative masterplan has been designed to allow Appin Land, located in the north west of the Draft Site Allocation boundary, to come forward separately.

⁶ [St Albans Broad Locations Landscape and Visual Appraisal](#) (September 2024)

⁷ Hankinson Duckett Associated - [North Hemel Hempstead Landscape Assessment](#) (September 2024)

2.10 The proposed application boundary (hereafter, the “Site”) is shown in **Figure 2-1** below.

Figure 2-1: Draft Site Location Plan



2.11 The most recent illustrative masterplan proposals are provided in **Figure 2-2** below. In summary, all of the main built development will be delivered within the western area of Site Allocation H1, to the west of the National Grid overhead powerlines (shown via the black dotted line in Figure 2-2). In the eastern area of the Site, to the east of the overhead powerlines, SANG will be delivered along with the provision of an ecological network including blue and green infrastructure, allotments, playing fields, sports and leisure spaces, improved connectivity to nature and retained open space. This is consistent with Draft Site Allocation H1.

2.12 The area excluded from the Draft Site Allocation located in the centre of the Site covers Little Revel End Farm and is owned by Mr and Mrs Sill. This section of land has been excluded at the request of the landowner who wishes the land to remain in situ. This land is not required to deliver Draft Site Allocation H1. An area in the northwest of the Site, Appin Land, is also excluded as it is not under the control of Pigeon and Bloor. As noted above, the illustrative masterplan for the Site has been designed to allow for this land to come forward separately.

2.13 The master planning work has treated these areas as constraints and demonstrated how the development can work effectively around them.

- 2.14 In summary, the Draft Site Allocation boundary has been developed to meet the requirements of the EBR, policy requirements set out in draft Site Allocation H1, and through discussions with landowners. The proposed Draft Site Allocation boundary area is justified and effective.

Figure 2-2: Illustrative Masterplan



Q2. 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?

- 2.15 The strategic need for Green Belt release is established in the Sustainability Appraisal⁸ (2024) ("SA") submitted in support of the SADC's draft Local Plan⁹ (2024).

⁸ St Albans City & District Council – [Sustainability Appraisal](#) (SA) of the St Albans Local Plan (September 2024)

⁹ St Albans City & District Council – [Draft Local Plan 2041 Regulation 19 Publication Part A](#) – (September 2024)

- 2.16 The SADC Housing Delivery Test Action Plan 2024¹⁰ (“HDTAP”) (published 2025) identified that, as of December 2024, only 52% of the Government’s housing target for SADC had been delivered. Updates to the NPPF in December 2024 increased the Council’s annual housing target requirement by 87.5%. This uplift in the housing target represents a major change in circumstances for the District. The HDTAP highlights at paragraph 4.2.2 that over 81% of the District is Green Belt land and acts as a limiting factor in land available for development. As such, exceptional circumstances have been demonstrated for justifying the release of Green Belt land within the District to ensure that there is not a significant shortfall in the supply of housing land over the plan period, and to remedy the evidenced affordability issues within the SADC.
- 2.17 The SA (2024) identifies that housing need cannot be met without Green Belt release.
- 2.18 Paragraph 148 of the National Planning Policy Framework¹¹ (“NPPF”) states that the need to promote sustainable patterns of development should determine whether a site’s location is appropriate, with regard to the necessary release of Green Belt land for development.
- 2.19 The SA identifies that there are a range of substantial economic, environmental and sustainable benefits that would result from the HGC development as a whole, of which Draft Site Allocation H1 has a key role to play. The SA also views the HGC as a ‘constant’ rather than a variable option within the SADC Draft Local Plan, as such, the strategic release of Green Belt land is necessary to deliver the HGC.
- 2.20 As noted at paragraph 3.37 and 3.38 of the draft Local Plan, the HGC Growth Areas allow for growth beyond the plan period to 2050, to help prevent boundaries being altered at the end of the plan period. Within SADC, the HGC Growth Areas will deliver at least 4,300 new homes by 2041, with a further 1,200 homes by 2050, providing a total of 5,500 new homes.
- 2.21 Regarding the Green Belt boundary, the SADC Local Plan 2041 – Broad Locations – Landscape and Visual Appraisal (September 2024)¹² forms part of the assessment of Draft Site Allocation H1. The Appraisal identifies the landscape characteristics of the Site and makes several recommendations, including that the *“existing pylon line easement provides a logical limit to the extent of built development eastwards, helping to maintain the open gap between Hemel Hempstead and Redbourn to the east”*.
- 2.22 The existing National Grid electricity pylons represent a key boundary feature of the Site and contribute to one of the key purposes of the Green Belt in preventing towns merging with one another by defining a clear long term boundary to the expansion of Hemel Hempstead.
- 2.23 The overhead electricity pylons mark a clearly defined Green Belt Boundary in that they are prominent, linear and in a fixed location, crossing the Site in a north to south direction, and are highly visible as a physical feature within the landscape, as recognised in the SADC draft Local

¹⁰ St Albans City & District Council - [Housing Delivery Test Action Plan 2024](#) (February 2025)

¹¹ UK Government – [National Planning Policy Framework](#) (December 2024)

¹² St Albans City & District Council Draft Local Plan 2041 – [Broad Locations – Landscape and Visual Appraisal](#) (September 2024)

Plan Landscape and Visual Appraisal¹³. The pylons are also clearly defined on Ordnance Survey maps. Overhead electricity pylons benefit from statutory protection under Schedule 4 of the Electricity Act 1989¹⁴ authorising the license holder (National Grid) to install, maintain, repair or alter any electricity lines. It is unlikely that the location of the pylons will change within the plan period.

- 2.24 Within the illustrative masterplan that has developed over eight pre-application meetings and two Design Review Panels, new strategic landscaping and planting, green and blue infrastructure has been agreed, strengthening the existing vegetation and hedgerow within the pylon easement. Over time, this will provide additional visual and permanent physical features contributing to a clear and distinguishable Green Belt Boundary. In the exceptional long term event that the line of pylons was removed, these features will have become established to form their own clear boundary.
- 2.25 The proposed features to be located in the Green Belt in the east of the Site within the illustrative masterplan are acceptable and comply with the NPPF. Paragraph 154 b) of the NPPF sets out that the provision of appropriate facilities within the Green Belt, including the provision of outdoor sport facilities and outdoor recreational facilities, are appropriate as long as the facilities preserve the openness of the Green Belt. The eastern area of the Site, beyond the overhead powerlines, is proposed to be retained within the Green Belt. These additional uses include strategic and local public open space, sports facilities, allotments, contributions to SANG through blue and green infrastructure and contributions and improvements to access routes. These are considered acceptable forms of development within the Green Belt and will act as a further buffer between the built up areas of Hemel Hempstead and Redbourn.

Q3. Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

- 2.26 Yes. Paragraph 146 of the NPPF states that exceptional circumstances for altering Green Belt boundaries include instances where an authority cannot meet its identified need for homes through other means. As previously stated, the strategic need for Green Belt release is established. Draft Site Allocation H1 would form part of the wider HGC urban extension and is critical to the development of the emerging HGC proposal, which plays a key role in supporting the delivery of 11,000 homes and 10,000 jobs by 2050 across SADC and DBC.
- 2.27 The location of Draft Site Allocation H1 on the eastern edge of Hemel Hempstead represents a highly sustainable location for a high quality landscape and design led neighbourhood and provides the eastern access onto Redbourn Road for the strategic sustainable movement corridor on which HGC relies.
- 2.28 Draft Site Allocation H1 has been subject to extensive master planning, developed through eight pre-application meetings, Design Review Panels and County Highway meetings, to ensure a sustainable approach to the delivery of Draft Site Allocation H1, and its coordinated development within the wider HGC development.

¹³ St Albans City & District Council Draft Local Plan 2041 – [Broad Locations – Landscape and Visual Appraisal](#) (September 2024)

¹⁴ UK Government - [Electricity Act 1989](#)

- 2.29 A Green Belt Review (“GBR”) was undertaken, with Stage 1¹⁵ of the GBR published in 2013, and Stage 2¹⁶ of the GBR published in 2023. Stage 1 assessed the entirety of the Green Belt within SADC against the purposes of the Green Belt set out in the then version of the NPPF. Stage 2 of the GBR provided a more in-depth assessment of sites and fed into the site selection process, informed by the Call for Sites. The Stage 2 GBR concluded that the area of land that covers the Site Allocation (GBR Ref: SA-170) was deemed to strongly support the purposes of the Green Belt.
- 2.30 Whilst the Stage 2 report recommended that Draft Site Allocation H1 should not be considered further as part of the Green Belt review, the Local Plan Evidence – Site Selection Methodology, Outcomes and Site Allocations, Appendix B, Green Belt Sites Recommended – HGC Proformas (2024)¹⁷, provided a qualitative assessment of Draft Site Allocation H1 and recommended it for further consideration. The assessment identified Draft Site Allocation H1 as adjoining Hemel Hempstead, a Tier 1 Settlement, offering a comprehensive range of very significant economic, environmental and social benefits as well as supporting the delivery of the HGC programme.
- 2.31 The existing overhead pylon line that dissects Draft Site Allocation H1 is proposed to delineate the revised Green Belt Boundary. The revised Green Belt would still meet the other objectives of the NPPF in preventing unrestricted sprawl of large built-up areas, and preventing neighbouring towns merging into one another.

Q4. How have the landscape impacts of the allocation been considered, having particular regard to the setting of the Chilterns National Landscape?

- 2.32 A Landscape & Visual Impact Assessment (“LVIA”) is being prepared as part of a planning application. The LVIA will consider the level of effects on landscape character and visual amenity arising from the proposed development. The methodology and approach has been discussed and agreed with SADC and the Hertfordshire Landscape Officer through the EIA Scoping Process. This has included agreeing viewpoints for the visual assessment.
- 2.33 The baseline work for the LVIA provides an analysis of the published landscape characterisation documentation. This includes a review of the NHHLA (2024) which forms part of the Council’s Evidence Base. That part of the North Hemel allocation that comprises built development users falls within Assessment Parcel F (Revel End Slopes), which is judged by the report to be of ‘Medium’ landscape sensitivity.
- 2.34 The Chiltern National Landscape lies approximately 1km to the north west of the allocation at its closest point. When considering the Assessment Parcel’s relationship with the National Landscape the NHHLA concludes that the:

“the minor ridge from Pancake Wood to Hay Wood, plus intervening tree cover on this higher ground separate the Assessment Parcel (F) from the AONB [National

¹⁵ SKM - [St Albans Stage 1 Green Belt Review](#) (November 2013)

¹⁶ Arup - [St Albans Stage 2 Green Belt Review](#) (June 2023)

¹⁷ St Albans City & District Council - Local Plan Evidence – Site Selection Methodology, Outcomes and Site Allocations - [Appendix B - Green Belt Sites Recommended – HGC Proformas](#) (2024)

Landscape] to the north-west and limits any meaningful contribution to the AONB's [National Landscape's] southern setting" (page 26)."

- 2.35 When considering the potential effects on the National Landscape without any mitigation, the report concludes that:

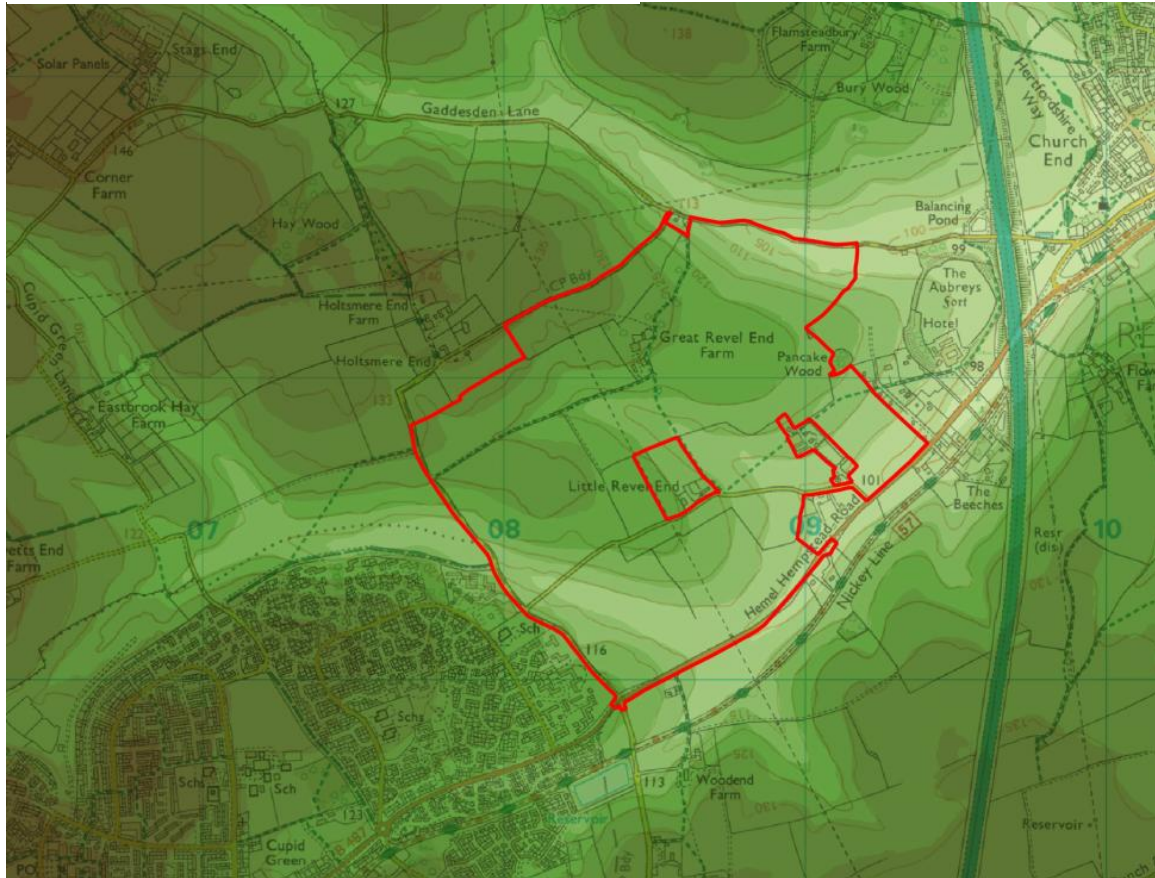
"It is envisaged that development of the area west of the pylons would not have a noticeably adverse effect on the general southern setting of the AONB [National Landscape]" (page 49)."

- 2.36 The NHHLA is a comprehensive and robust document and we concur with the report's overall findings.

- 2.37 An understanding and an assessment of the local landscape has been developed through the more detailed work of the LVIA, which has included summer and winter field work. This has considered the landscape character of the study area, and potential visibility of the Draft Site Allocation from the Chilterns National Landscape. Whilst there are opportunities for distant views across the wider landscape from the National Landscape, which includes filtered and occasional views of very eastern parts of the allocation – which would be of agricultural land and the proposed Community Park – there are no views of that part of the allocation proposed for built development, as a consequence of intervening landform and vegetation. This comprises higher land at Holtsmere Lane Farm, which forms a small local ridge across to Great Revel Farm and Pancake Wood (see **Figure 2-3**), woodland at Hay Wood and adjacent woodland extending northward to Gaddesden Lane, and established and well-treed hedgerows.

2.38 The Draft Site Allocation itself is bordered by substantial vegetation in the form of tall hedgerows and a belt of mature trees along Holtsmere End Lane on its western and northern boundaries. These elements all combine to prevent clear views from the National Landscape of the western part of the allocation (i.e. that proposed for built development west of the pylons).

Figure 2-2: Draft Site Allocation H1 Topography



2.39 The illustrative masterplan for the Draft Site Allocation adopts a 'ground up' landscape led approach, where existing site features, such as the mature tree belt on Holtsmere End Lane, are retained within dedicated green corridors. These features are expanded upon with a network of new landscape habitats (woodland planting, tree planting, hedges and natural green space) as part of an extensive green infrastructure framework, which includes a large Community Park within the eastern part of the allocation which comprises new woodland, tree planting and accessible green space. These approaches would sensitively assimilate built development into the landscape and will minimise adverse effects on landscape character and visual amenity.

2.40 It is considered that impacts and levels of landscape and visuals will be restricted in extent to a localised area, and there would be no adverse effects on the National Landscape and its setting.

Q5. 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?

- 2.41 The EBR has been guided by the HGC Spatial Vision¹⁸ that provides a series of aspirations for the future of HGC, subdivided into four thematic pillars and two crossover themes: a green network; integrated neighbourhoods; a self-sustaining economy; and engaged neighbourhoods.
- 2.42 The EBR aims to provide a framework for the HGC Growth Area. It includes a Concept Framework Plan identifying the main connections, neighbourhoods, land uses, facilities and open spaces across the HGC. Four scenarios were considered through an iterative design process, taking into account site characteristics, emerging policy requirements and other local plan evidence. A refined set of outcomes following further input from HGC, HCC, DBC and SADC included:
- No development on the Gade Valley slopes or to the east of the National Grid overhead powerlines, and a more substantial green buffer to the northern and northeastern perimeter of the site to create a clear limit to built development.
 - Retention of the land within the Green Belt, with the potential for use as SANG, open space, secondary schools, playing fields and other open space.
 - A substantial area of search for SANG.
 - Three 8FE secondary schools on 10.78 ha sites to serve the Growth Area.
 - Eight primary school locations.
 - Five local centres.
- 2.43 Master planning for the Site has been developed through the EBR and across eight pre-application meetings with SADC and DBC to ensure the mix of uses proposed meets the requirements of Draft Site Allocation H1. The EBR sets out the evidence base for SADC and DBC Draft Local Plans in relation to the delivery of HGC as a whole, focusing on how the different sites will integrate, setting out the desired principles of the development.
- 2.44 The mix of uses proposed for Draft Site Allocation H1 reflects the requirements of the EBR and Draft Allocation Policy H1 and will contribute to the delivery of a local centre, including flexible mixed-use development, specialist housing, a three-form primary school, and a mobility hub. The new local centre has been developed in line with the wider HGC objectives to ensure that a neighbourhood community is delivered without creating competition with the existing Woodhall Farm and neighbouring facilities. This process has ensured that the different sites which comprise the HGC will complement rather than compete with each other.
- 2.45 The development proposals include the retention of land within the Green Belt for use as SANG, open space, active travel routes, allotments, community orchards and playing fields. The master planning work has evolved with key input from SADC, Hertfordshire County Council ("HCC"), HGC and other stakeholders in the pre-application meetings and from the DRP meetings, where it has been shown that the mixed-use proposals are deliverable within the Site boundary, and this has been confirmed in a review of the Site's land budget and density.

¹⁸ Hemel Garden Communities Programme [A Spatial Vision](#) (2021)

- 2.46 The HGC Strategic Design Code¹⁹ establishes the principles for developers to follow when developing their plans and introduces area types to define qualities that contribute to the varying character across the HGC, ensuring a coordinated and coherent design approach. Part 15 of Draft Site Allocation H1 requires any neighbourhood master planning to respect the new neighbourhood design coding, as set out in the Strategic Design Code. Part 23 also requires contributions to health and sports provision within the wider HGC Growth Areas.
- 2.47 Concerning the wider HGC aims and objectives, Pigeon and Bloor have been working closely with The Crown Estate, who control Draft Site Allocations H2, H3 and H4, to the south of H1. This collaborative approach will promote consistency across the HGC urban extension and ensure that the shared road junction on the B487, between Draft Site Allocation H1 and H2 is delivered collaboratively and in a consistent manner to support the wider objectives of HGC by way of creating a Sustainable Transport Corridor through the whole of HGC. Bloor and Pigeon have been engaging with The Crown Estate and SADC to agree on the design principles for works to the B487 to ensure a coherent approach to its delivery. There are further scheduled joint meetings to discuss strategic matters going forward.

Q6. Can the allocation deliver the necessary mix of uses and supporting infrastructure? Is it developable within (and beyond) the plan period?

- 2.48 Extensive master planning work has been carried out across eight pre-application meetings with SADC and other relevant stakeholders between February 2025 and August 2025. Across the pre-application meetings, the master planning work has developed from an initial broad vision concept to an illustrative masterplan for the Site, demonstrating that the proposed mix of uses and supporting infrastructure is deliverable within the proposed Site boundary, and within the plan period. In summary, the following pre-application meetings have taken place:
- Pre-app meeting #1 (13 February 2025) – master planning with a focus on green & blue infrastructure and movement across the Site, an assessment of constraints and opportunities, and emerging master planning design concepts.
 - Pre-app meeting #2 (13 March 2025) – part one of the meeting focused on connectivity to and within the Site including green links, movement and access. Part two focused on the approach to the EIA Scoping Report.
 - Pre-app meeting #3 (3 April 2025) – provided a design update, establishing the key design principles of the Site, contents of the Design & Access Statement and Development Specification. A review of the HGC Strategic Design Code was undertaken and responded to as part of the master planning work.
 - Pre-app meeting #4 (6 May 2025) – focused on the existing and proposed wider connections of the Site, the movement strategy and access points. The proposed Sustainable Transport Corridor (“STC”) and bus access strategy to the Site was presented, the potential locations of the proposed mobility hub, local centre and primary school, and active travel routes across the Site. The initial proposed parameter plan and land use budget were presented for discussion.

¹⁹ Hemel Garden Communities [Strategic Design Code](#) (September 2024)

- Design Review Panel #1 (14 May 2025) – a review of the Site was undertaken with a focus on the emerging concepts of movement and connectivity, the landscape strategy, character areas and the nature of the STC. Feedback was received 29 May 2025 with key recommendations that included strengthening the proposals along the STC, encouraging sustainable transport choices, considering wider connections and exploring the separation of character areas into site-specific characteristics.
- Pre-app meeting #5 (8 July 2025) – an overview of the drainage strategy having mapped the site’s physical constraints and existing landscape features, including section plans and levels strategy was presented. The design principles of the green infrastructure plan were also discussed.
- Pre-app meeting #6 (29 July 2025) – the parameter plans including land use, green & blue infrastructure, and heights and levels were presented, along with the outline of the outline planning application control documents. A draft masterplan was assessed against the land budget.
- Pre-app meeting #8 (20 August 2025) – part one of the meeting focused on character areas, including placemaking hierarchy and principles, and street hierarchy and key design principles. Part two of the meeting discussed social infrastructure being delivered on-site including the local centre, school, mobility hub, specialist care, health, green infrastructure and sports provision.
- Design Review Panel #2 (24 September 2025) – a follow-up targeted virtual short session took place that focused on character areas and density.

2.49 Most recently, a pre-application meeting was held with SADC on the 20th August 2025, which provided an updated illustrative masterplan for the Site (**Figure 2-2**) and further details on the proposals for the mixed-use local centre, demonstrating that the necessary mix of uses and supporting infrastructure can be achieved.

2.50 Alongside the pre-application meetings, two independent design reviews have taken place with Design South East, one held on 14th May 2025 and the second meeting held on 24th September 2025. These Design Review Panels have fed into the developing illustrative masterplan.

2.51 Meetings have also taken place between Pigeon and Bloor and the Education Authority on the location and design requirements of the three-form entry primary school, and with the County’s Highways team on the highway modelling and proposed highway works.

2.52 Through these meetings, the deliverability of Draft Site Allocation H1, the proposed mix of uses and infrastructure that forms part of the allocation, has been discussed in detail. Feedback has been received from SADC and statutory consultees, which has been responded to through the evolution of the design. Subsequently, Pigeon and Bloor are now in the process of preparing a planning application, which will be submitted to SADC with a target submission of Quarter 4 2025.

2.53 The NPPF states that to be considered developable, sites should be in a suitable location for housing development. The SA (2024) has shown that the Draft Site Allocation is in a suitable

location for housing development, located immediately adjacent to Hemel Hempstead. The NPPF also states there should be a reasonable prospect that sites will be available and could be viably developed at the point envisaged. Pigeon and Bloor have undertaken viability work and can confirm the Site can be viably developed.

2.54 Regarding the timing of delivery, there is no restriction on the delivery of all 1,500 homes within the Plan period, providing that any future application can demonstrate, through technical assessment work, that the number of homes proposed within the development is acceptable.

2.55 The expected trajectory for housing delivery for the Site is shown below in **Table 2-1**. Pigeon and Bloor confident that they can deliver more than the 1,125 homes as required by Draft Allocation Policy H1 within the plan period.

Table 2-1: North Hemel Housing Trajectory

Year	29/30	30/1	31/2	32/3	33/4	34/5	35/6	36/7	37/8	38/9	39/40	40/1	Total
Sales ²⁰	10 ²¹	50	100	150	150	150	150	150	150	150	130	115	1455

2.56 The masterplanning work has demonstrated that the Site, comprising a gross area of approximately 103 hectares, has the capacity to deliver approximately 1,500 homes within a net developable area of approximately 35.9 hectares.

2.57 Overall, the Site represents a deliverable, technically unconstrained and a sustainable location for new development, and Pigeon and Bloor are committed to delivering this Site, and to working collaboratively with SADC, DBC and other landowners with interests in the Draft Site Allocation H1 and the wider HGC area to develop the strategy for coordinated, sustainable development.

Q7. 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?

2.58 Increased recreational disturbance at the SAC has the potential to lead to trampling, erosion, vandalism and nutrient enrichment from dog waste. Although the proposed development is over 7.3km it does fall within the 12.6km zone of influence ("Zoi") where recreational disturbance can occur.

2.59 Owing to the proximity of the Site to the SAC the development will comply with the Strategic Access Management and Monitoring Strategy ("SAMMS") set out by Natural England and the partner authorities, which works to improve site management through access management

²⁰ Excludes Specialist and Self Build

²¹ Q1 2030

and engagement work. The strategy aims to mitigate potential recreational disturbance on the SAC from new residential developments in-combination. A financial contribution, in accordance with the applicable tariff, will be provided by the development to support the long-term implementation of the SAMMs. The contribution will be secured through a Section 106 agreement before the development commences and is built into the Councils viability report²² based on £828.60 per dwelling (as of September 2024).

- 2.60 Due to being within the Zol, the development must also make provision for a new Suitable Alternative Natural Greenspace (SANG). This will provide a range of recreational opportunities for future residents from the new development, reducing the need to travel to the Chiltern Beechwoods SAC.
- 2.61 A SANG has been proposed to the east of the proposed development Site to comply with the relevant SANG criteria. This covers around 30ha of land with the SANG forming part of the development's proposed Community Park. The design principles of the SANG, in terms of quantum and location, have been guided through early engagement with Natural England. Existing public footpaths and new recreational routes within the development will enable the local community to easily access the Community Park. The provision of SANG is required by part 5 of the Draft Site Allocation H1.
- 2.62 The Habitats Regulations Assessment for St Albans City & District Council (September 2024)²³ confirms that the above is appropriate mitigation to avoid any likely significant effect on the nearby SAC due to recreational pressure, in isolation and in combination. Therefore, the development will not have an impact on the SAC as all impacts have been assessed and will be mitigated.

Q8. Is Policy H1 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

- 2.63 Pigeon and Bloor are supportive of Draft Site Allocation H1 as it allocates development at a deliverable, unconstrained and sustainable location for new development. It has been demonstrated through the master planning work and discussions across the eight pre-application meetings and additional statutory consultee meetings that the policy requirements of Policy H1 are deliverable within the Site boundaries.
- 2.64 Paragraph 20 of the NPPF advises that strategic policies make sufficient provision for homes, employment, retail, leisure and other commercial development, as well as the provision of community facilities and the contribution to green infrastructure and natural landscapes. Paragraph 23 states *"broad locations for development should be indicated on a key diagram, and land-use designations and allocations identified on a policies map"*.
- 2.65 Draft Site Allocation H1 is identified within the draft policies map (Draft Policies Map 1 of 4 (North West²⁴)) and meets the requirements set out in paragraph 20 of the Framework by way of delivering a minimum of 1,500 dwellings, a flexible mix of retail and commercial development

²² BNP Paribas Real Estate - [St Albans District Council Local Plan Viability - Strategic Site Testing: North Hemel Hempstead](#) (September 2024)

²³ AECOM – [Habitats Regulations Assessment](#) – Regulation 19 Local Plan

²⁴ St Albans City & District Council – [Draft Policies Map 1 of 4](#) (North-West)

as part of a local centre, sports, play and leisure facilities, and areas of open space and SANG. As such, Draft Site Allocation H1 is an effective and sustainable location for new development and is consistent with national planning policy. The Site has a critical role to play in the effective delivery of the wider HGC.

2.66 To facilitate the timely delivery of the development at H1, representations were made at the SADC Regulation 19 Local Plan Stage, requesting amendments. These are summarised below.

- **Draft site allocation boundary** – as previously explained at question 1 of this Hearing Statement, a portion of land is excluded from the draft site allocation. That land is owned by Mr and Mrs Sill, who do not wish to see it developed. Immediately to the west of that portion of land, is a narrow parcel of land that is not controlled by Pigeon or Bloor. Following discussions with SADC, a minor amendment to the Draft Site Allocation H1 has been made to exclude the sections of land that are not owned by Pigeon or Bloor. The exclusion of this land will not affect Pigeon or Bloor’s ability to deliver all of the policy requirements of draft Site Allocation H1.
- **Proposed Use** – Pigeon and Bloor note that the draft allocation states that approximately 375 homes will be delivered post-2041. As noted above within Table 2.1, through the masterplanning work, Pigeon and Bloor are confident that they can deliver more than the 1,125 homes within the Plan period.
- **Sports provision** – the allocation makes reference in paragraph 1 to including sports facilities and also includes requirements for contributions to health and sport provision within the wider HGC Growth Areas under paragraph 23. Pigeon and Bloor support the delivery of sports facilities, but it is important to recognise the financial commitment being asked in both delivery and contributions to sports facilities. The draft “Hemel Garden Communities Infrastructure Delivery Plan” expects draft Site Allocation H1 – North Hemel Hempstead to contribute £3,071,524 for playing pitch provision and £1,676,359 for sports provision in HGC. It should be expected that any sports facilities delivered as part of the allocation would reduce the financial contributions for sports provision in the wider HGC.
- **Extra-care facilities** – paragraph 11 states that the allocation should deliver two extra care facilities comprising of 70-80 self-contained units in each facility, one 70-80 bed nursing home and 6 supported living units for people with disabilities. As reflected in the representations submitted at the Regulation 18 and 19 stage, there are a number of ways in which the needs of older people can be met, as set out within the subtext of draft Policy HOU3 and Planning Practice Guidance (“PPG”) Paragraph: 010 Reference ID: 63-010-20190626. Therefore, we would suggest that the allocation wording is revised to remove specific reference to “extra-care” and instead state “specialist housing for older people”. This includes housing with support (retirement living and / or sheltered housing) and housing with care (extra care housing and / or housing with care), residential care homes, and other appropriate forms of accommodation. This provides the flexibility to deliver accommodation that provides variety and meets demand, while meeting SADC’s requirement for specialist accommodation.
- **Integrated mobility hub** – paragraph 12 refers to both the educational requirements and the mobility hub. We recommend that paragraph 12 be split into two parts, to differentiate between the two facilities.

2.67 The above amendments to the wording of draft Site Allocation H1 would improve clarity on several elements of the proposed development and ensure the timely delivery of Draft Site Allocation H1.