



The countryside charity
Hertfordshire

Stage 2

Examination of the Dacorum Local Plan & the St Albans City and District Local Plan – Joint Session

Matter 4 – Hemel Garden Communities

Matter 6 – Hemel Garden Communities

Hearing Statement

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On behalf of

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Introduction

1. This statement has been prepared by Jacqueline Veater, BA (Hons), MA, MRTPI, Planning Consultant, on behalf of CPRE Hertfordshire – The countryside charity (CPREH). It has been compiled in response to the Examination Inspectors' invitation to participate in Stage 2 Joint Hearings sessions into the soundness of the Dacorum Local Plan and the St Albans City and District Local Plan (St Albans Local Plan).
2. For reference, the full [Regulation 19 response from CPREH](#) (ID-1376), to the pre-submission Local Plan can be found on Dacorum's website '[Responses to the Regulation 19 consultation](#)' and the full [Regulation 19 response from CPREH](#) #288 to the St Albans and City Local Plan can be found on St Albans City and District Council website.
3. This statement addresses Matter 4 (Dacorum)/ Matter 6 (St Albans) – Hemel Garden Communities ('HGC'), Issue 1 – Justification for Strategic Growth, Question 5, and Issue 4 – Infrastructure Provision, Question 1.

Issue 1 – Justification for Strategic Growth

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

4. CPREH takes issue with the lack of concern for the impact on the Green Belt of the decision to put forward a proposal for significant growth (11000 homes and 10000 jobs in St Albans and Dacorum) to the north and east of Hemel Hempstead.
5. Policy LG1 in St Albans Local Plan omits the requirement for the definition and creation of a new defensible permanent Green Belt boundary to be identified. In St Albans Local Plan in particular, the demonstration of exceptional circumstances required to justify the removal of land from the Green Belt for Hemel Garden Communities (HGC) is absent. The need for HGC in St Albans seems only to be justified by it being a cross-boundary proposal proposed by government, that is happening in the District.
6. The low profile of the Green Belt as a statutory designation, particularly as it is the most extensive land designation in the Borough of Dacorum, probably contributes to the meagre discussion of the implications of losing so much Green Belt on the edge of Hemel. CPREH would like to see a fuller analysis of the impact of the loss of Green Belt around the large town of Hemel particularly in the light of its proposed significant expansion. Impacts should take into account not only the loss of countryside but the

reduction in the ability of the remaining Green Belt to ameliorate climate change, reaping physical and mental health benefits, and the promotion of its biodiversity potential.

7. CPREH would like to see prescriptive criteria specifically relating to the remaining Green Belt within the HGC proposal, in Borough of Dacorum. These should be detailed in Policy HGC2, either in its own 'Pillar', or highlighted as improvements that will be made to the area of Green Belt that will be much smaller but required to serve a much large population. This would help to raise the importance of Green Belt land within HGC.
8. The request of this prescriptive criteria could equally be embedded into the St Albans Local Plan Policy LC3 which would provide reassurance that as Hemel Hempstead grows, the new edges around the town would remain as Green Belt. Safeguarding the remaining Green Belt around Hemel, along with the advantages it will provide for the new HGC, would be a positive statement to resist development pressure claiming the land has 'become' Grey Belt.
9. The St Albans Plan notes that the Chilterns National Landscape "lies to the north of St Albans District". The National Landscape is mentioned in Policy LG3 in relation to the design and layout of development saying in Pillar 1 – Green Network that it "avoid or minimise adverse impacts on the Chilterns National Landscape, views in and out and its setting in perpetuity" (criterion d), and in Pillar 2 – Integrated Neighbourhoods that development should "minimise the impact on the surrounding landscape setting, including the Chilterns National Landscape and its setting" (criterion f). In the case of this latter criterion, it appears that the priority is still to achieve a minimum overall net density of 40 dwellings per hectare.
10. Policy HGC2 in the Dacorum Local Plan has the same limited concern for the Chilterns National Landscape with similar criteria although numbered differently.
11. Appropriate treatment of the contribution of the Green Belt and the sensitivity of the Chilterns National Landscape in both the text and policies of the St Albans and Dacorum Local Plans would highlight the implications for these statutorily designated protected land designations arising from the growth of Hemel Hempstead.

Issue 4 – Infrastructure Provision

Question 1: Is there sufficient certainty regarding the total quantum, timing and cost of infrastructure necessary to facilitate the HGC in line with the Councils' expectations?

12. CPREH made representations at Regulation 19 about the lack of deliverability of the St Albans Local Plan per se, due to the existing and projected pressures on infrastructure in the Borough. In terms of the HGC proposal the infrastructure required to deliver this level of development is still being discussed and studied, which increased the uncertainty.
13. In the Dacorum Local Plan, the treatment of implementation in Chapter 11 – Infrastructure Delivery and Monitoring comprises two policies containing statements of intent. However, given the enormity of the HGC infrastructure requirements this is inadequate. Worryingly, the Local Plan refers to viability assessment suggesting the use of viability assessment to gain consent for development without having to provide or fund the necessary infrastructure.
14. Possibly the most insurmountable infrastructure issue is that of water supply and waste water. The implications for the chalk streams in the vicinity of HGC which already suffer from over abstraction for water supply and devastating environmental pollution due to the inability of current sewage treatment facilities to deal with waste water, are being ignored.
15. The Infrastructure Delivery Plan for Dacorum states clearly that “The Hertfordshire Water Study confirms that wastewater treatment capacity is available to support current growth levels in Hertfordshire to 2031. However, investment in capacity will be required to service growth beyond that period”. Thames Water’s issues are also well-known and existing sewerage infrastructure is inadequate to cope with current, let alone future population. This is evidenced by the level of waterborne pollution in our Internationally significant chalk streams.
16. Affinity Water has identified a significant supply/demand deficit. Water use must be reduced in the long term. However, CPREH fails to see where such a new water supply delivery for Affinity Water has been identified. Water supply in Hertfordshire is likely to become critical in the short term. This fact alone is enough to throw considerable doubt on whether the HGC infrastructure requirements can be met in line with the Councils' expectations.
17. The St Albans City & District Local Plan – Transport Modelling Narrative – July 2025 (document SADCED76B) identifies the predicted significant growth in traffic in the District, by 2041, as a result of development already planned, before the Local Plan

Sites, and HGC in particular, come forward. The statement also features an element of guesswork, raising the issue of uncertainty about the infrastructure necessary to facilitate HGC and how much it will cost.

18. Much work has been carried out on modal shift towards more sustainable modes of travel, which whilst desirable is dependent on the willingness of those using the existing transport network, to change their travel patterns and methods of travel. Both the St Albans and the Dacorum Local plans contain the same policies for transport infrastructure, relying on achieving a target of 60% of all journeys starting, ending or within the HGC growth area to be undertaken by active and sustainable travel modes, without any certainty how or if this can be achieved.