



**Dacorum Local Plan Examination:
Stage 2, Matter 4
St Albans Local Plan Examination:
Stage 2, Matter 6
– Hemel Garden Communities
Hearing Statement on behalf of
Kitewood Estates Limited**



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SECTION 1

Introduction



1.0 Introduction

1.1 Preface

- 1.1.1 This Statement has been prepared by CarneySweeney on behalf of Kitewood Estates Limited ('Kitewood') in response to Matter 4 of the Inspector's Matters, Issues and Questions dated 29 August 2025, concerning the Hemel Garden Communities ('HGC'), as part of the Examination into the Dacorum Local Plan. As the HGC straddles both Dacorum and St Albans, this statement also related to Matter 6 of the St Albans City & District Local Plan Examination.
- 1.1.2 This Statement addresses planning considerations. A separate statement has been prepared by Velocity on behalf of Kitewood in relation to highways and transport. Together, these documents constitute Kitewood's comprehensive submission in response to Matter 4 (and Matter 6 of the St Albans Local Plan Examination)

1.2 Background

- 1.2.1 Kitewood owns and controls land within the proposed HGC Growth Area, located to the northeast of Hemel Hempstead at Holtsmere End Farm. Their landholding is situated entirely within the 'HM01 – North Hemel Hempstead Growth Area' designation within Dacorum Borough. This designation is contiguous with draft allocation 'H1 – North Hemel Hempstead' within the St Albans Local Plan.
- 1.2.2 Kitewood has prepared and submitted representations to both draft Local Plans. We provide a summary of these representations as follows:



Representations to the St Alban's City & District Council Regulation 19, dated 8th November 2024

- 1.2.3 The representations offered support for the HGC Growth Area as its development is consistent with the Government's aspirations to boost the delivery of new homes. Kitewood raised concerns over the lack of the detail on the delivery of the infrastructure that is to be phased alongside the delivery of the allocations, in particular how the phasing of the infrastructure relates to the delivery of the Hemel Hempstead allocation (HM01) in the Dacorum Local Plan. Further emphasis was submitted on the need for cross-boundary co-operation and to ensure that there is a joined-up approach between St Albans and Dacorum in relation to the delivery of infrastructure within the Growth Area.

Representations to the Dacorum Pre-Submission, dated November 2024

- 1.2.4 The representations reflected the same themes as those previously submitted to St Albans, continuing to support the establishment of the HGC Growth Area and underscoring the necessity of delivering housing in alignment with the Government's agenda. Kitewood highlighted the importance of a joint examination of both the St Albans and Dacorum Plans. A key concern raised was the insufficient detail regarding the phasing of infrastructure delivery alongside the development within the Growth Area. The representations emphasised that, for policies to be effective, a coordinated approach to infrastructure delivery is essential, ensuring full alignment of the relevant infrastructure items set out in the respective Infrastructure Delivery Plans (IDPs).
- 1.2.5 Kitewood reiterated its support for Draft Strategic Policy HM01, confirming that its land is both available and deliverable in the early stages of the Plan, thereby making a significant contribution toward meeting the housing targets for the plan area. It was further noted that Kitewood's land can be developed from either the eastern or western side of the proposed HGC Growth Area.



SECTION 2

Matter 4 (Dacorum)/ 6 (St Albans) – Hemel Garden Communities



2.0 Matter 4 (Dacorum)/ 6 (St Albans) – Hemel Garden Communities

2.1 Issue 1 – Justification for Strategic Growth

2.1.1 1 : *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.*

2.2 Question 2: 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

2.2.1 Kitewood continues to support the ambition to deliver the HGC Growth Area. This Growth Area is projected to provide up to 11,000 new homes and thousands of new jobs by 2050 across St Albans District and Dacorum Borough. Specifically, within Dacorum, the North Hemel (HM01) part of the Growth Area is planned to deliver at least 1,500 new homes by 2041, with a further 3,500 by 2050, totalling 5,000 homes. This proposed plan is strongly supported as it aligns with the Government's overarching objective of increasing housing supply. However, it is clear that the successful delivery of these targets will require significant infrastructure investment. Kitewood maintains that there remains a lack of clarity regarding which infrastructure projects will be delivered, the responsible parties, timelines, associated costs and who will pay these costs.

2.2.2 A review of the most recent evidence, including the HGC Delivery Statement (March 2025) (HGC01.1), highlights proposed improvements such as the extension of the Nickey Line, the delivery of the HGC Green Loop, and the establishment of a network of mobility hubs. The document provides a summary of various evidence-based reports published alongside the submitted plans. Nevertheless, detailed information regarding the infrastructure accompanying the housing allocations is notably absent from the Statement.



- 2.2.3 The September 2024 Framework Plan (HGC02.1) of which Kitewood was party to its creation, identifies the Sustainable Transport Corridor (STC) proposed to run through the Growth Area as a key component intrinsically linked to supporting growth. Kitewood strongly endorses the provision of this STC, recognising its potential to unlock development and promote sustainable travel throughout the area. However, concerns remain regarding the specifics of the corridor's implementation. The Framework Plan indicates that the route of the STC is not yet fixed, with its final form contingent upon the Transport Vision, detailed feasibility studies, and master planning. Additionally, proposals for the Hertfordshire to Essex Rapid Transit system are under consideration, with further work required to determine its route and integration within the Growth Area.
- 2.2.4 Kitewood supports these initiatives, but detailed information on these proposals and their viability remains limited. The collaborative efforts between Highways England and Dacorum Borough Council (Statement of Common Ground, dated August 2025) is welcomed; both parties agree that the planned growth will not compromise safety on the Strategic Road Network. However, the Statements do not illustrate Highway's England position on the proposed highway improvements across the Growth Area.
- 2.2.5 In addition, we have reviewed Dacorum Borough Council's latest Infrastructure Delivery Plan (IDP) dated February 2025 (IDV01.2). The IDP includes an appendix listing transport interventions emerging from sustainable transport studies, along with associated cost estimates. Notably, these cost figures are based on December 2023 prices. We recommend that these costs be updated prior to plan adoption to reflect current values, ensuring a comprehensive understanding of the financial implications. Further information on the actual costs is needed and clarity as to whether these can be realistically funded proportionally by the developments coming forward.



- 2.2.6 The IDP also states that development contributions towards the strategic highway network will be secured through Section 278 agreements. We acknowledge that this approach may facilitate contributions from multiple sites. However, developer contributions must adhere to the same tests applied to planning obligations for Section 106 Agreements, as outlined in Paragraph 002 of the National Planning Practice Guidance (NPPG, Reference ID: 23b-002-20190901). Furthermore, it is essential that costs are transparent and proportionate to each individual development parcel. This would assist developers in understanding the viability impacts of bringing forward the aspirations of the Growth Area.
- 2.2.7 At present, the costs need to be understood and be proportionate to each development parcel. The documents that are available at this stage do not appear to indicate how the developer contributions for the transport interventions and infrastructure improvements will be set. This is important to ensure probity in the system and for the soundness of the plan.
- 2.2.8 The updated Schedule accompanying the Dacorum IDP, dated March 2025 (IDV02.2), outlines various costs associated with the proposed Transport Interventions. Notably, the HGC Sustainable Transport Corridor (STC) is described as *“delivery of a new sustainable transport corridor through the site linking Leighton Buzzard Road / Link Road and Redbourn Road (connecting with allocations in St Albans City and District Council).”* The document states that work is ongoing and that further information will be provided shortly. This intervention is identified as developer-funded and deemed “critical” to the delivery of the Local Plan. However, the Schedule does not provide an overall estimated cost or a specific timeframe for delivery. Although it references a figure of 1,500 dwellings required to contribute towards the corridor, no supporting rationale is provided regarding this threshold, nor is there clarity on the overall funding amount or phasing. As the Transport Corridor is identified in the Framework Plan as a key measure in supporting growth within the HGC Growth Area. We have concerns that the lack of clarity and assurances behind the corridor will limit growth and delay sites from coming forward.



- 2.2.9 The IDP 2025 (IDV02.2) outlines costs for key enhancement measures, including the M1 Junction 8 Enhancement Phase 2 and Phase 3 plans. While these measures carry significant costs, the documentation lacks details regarding the phasing and timing of infrastructure delivery. Consequently, there are concerns about when these enhancements will be implemented and which parties will be responsible for funding them. The documentation identifies these measures as critical to supporting growth but no delivery plan is provided, even though several measures, including the M1 Junction 8 enhancements, are described as “essential.” Similarly, the St Albans IDP from 2024 lacks sufficient detail on infrastructure phasing and availability to support development within the allocations.
- 2.2.10 Regarding Dacorum emerging Policy HM01, which pertains to Kitewood’s interests, the policy outlines several key development and land use requirements, including the provision of a new North Sustainable Transport Corridor through the allocation area. While Kitewood supports the delivery of this infrastructure, there are significant concerns that this element remains uncoded, as evidenced by Dacorum’s 2025 IDP (IDV02.2). Further concerns arise from the September 2024 Framework Plan (HGC02.1), which indicates that the corridor’s precise details and routes have yet to be finalised. This uncertainty raises questions about the timing of the corridor delivery, the developers expected to contribute and the scale of those contributions. Kitewood believes that each development parcel should be clearly defined within the allocation, along with an understanding of the likely infrastructure contributions required from each, and the mechanism for delivery. As set out in the Velocity Statement, Sustainable Transport Corridor (STC) must be delivered in a coherent and integrated approach to facilitate the mode share targets and provide appropriate priority to active and sustainable modes over the private car and provide public transport links along its length (e.g. bus) and accelerate the delivery of all of the developable and deliverable parcels within the Growth Area. We therefore consider that further details are required on this element of infrastructure.



2.3 Issue 3 – Highways and Transport

- 2.3.1 Please note, Issue 3 has been responded to by Velocity and their Statement should be read alongside this Statement.

2.4 Issue 4 – Infrastructure Provision

- 2.4.1 *2. 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.*

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

- 2.5.1 As outlined in our response to Issue 1, there remains insufficient certainty regarding the overall scale, timing, and cost of infrastructure required to support the delivery of the HGC Growth Area. While Dacorum's 2025 Infrastructure Delivery Plan (IDP) (IDV01.2) sets out significant costs associated with highway infrastructure improvements in Hemel Hempstead and related interventions, there is a noticeable lack of information concerning the phasing and coordination of these measures alongside the planned development.
- 2.5.2 Furthermore, the supporting documentation identifies the STC as a critical component, with Draft Policy HM01 specifying that the allocation should deliver the northern segment of this strategic link. However, the evidence indicates that the precise route and details of the corridor remain unconfirmed. Additionally, the 2025 IDP does not provide an estimated cost for this element or the mechanism of or timing for delivery.
- 2.5.3 References within the Delivery Plan and Framework Plan also highlight improvements to the Nickey Line as vital interventions to facilitate sustainable growth within the HGC area. Yet, similar to the STC, there is no clear cost estimate or defined delivery plan or timeframe for these improvements.



2.5.4 In light of these concerns, Kitewood questions the robustness of the current evidence regarding infrastructure delivery and considers that greater clarity is needed on the delivery plan of this essential infrastructure.

2.6 Question 2: Is there appropriate evidence as to how different forms of infrastructure (including schools and open space) have been apportioned to different HGC allocations.

2.6.1 The Draft Allocation for HM01 (North Hemel Hempstead Growth Area) outlines the requirement for three no. 3FE and one no. 2FE primary schools (with nursery provision included on three sites), alongside one no. 8FE secondary school. However, this differs from the infrastructure requirements set out in Table 18 of the 2025 Infrastructure Delivery Plan (IDP) (IDV01.2), which identifies the need for two no. 3FE primary schools at North Hemel Hempstead, one no. 2FE primary school at Hemel Hempstead, and a single 10FE secondary school located at North Hemel Hempstead.

2.6.2 This inconsistency between the Draft Allocation and the IDP introduces ambiguity. These documents need to be aligned to ensure clarity and consistency in infrastructure planning. Further discrepancies are noted in Paragraph 2.10 of the 2024 Framework Plan Evidence (HGC02.2), which references the preparation of the Framework Plan based on the provision of three no. 8FE secondary schools. This contrasts with the latest IDP (IDV01.2), which states: “secondary school provision would be a 10FE secondary school located at North Hemel Hempstead and one to the southeast of Hemel Hempstead.” We recommend that these conflicting figures be reconciled to provide a coherent basis for future planning and delivery.

2.6.3 While the Infrastructure Schedule (IDV02.2) includes indicative scheme costings, it does not appear to account for land acquisition costs. We consider it essential that the Schedule be updated to reflect the implications for developers who are expected to release land for infrastructure delivery, such as schools. This could be supported by detailed guidance on the role of the Community Infrastructure Levy (CIL), including how land contributions and infrastructure payments may be used to satisfy, in whole or in part, the CIL liability associated with a chargeable development.



2.6.4 Figure 21 of the Framework Plan Evidence Base explores potential school locations and catchment areas. We acknowledge that the methodology for identifying broad areas appears sound. However, the documents lack a detailed assessment to determine precise school locations. Greater clarity is needed in this regard.

2.6.5 Other observations in relation to schools:

2.6.6 Regarding Draft Policy HC3 (CD01.1), which currently states: “development that will increase education needs will be required to provide or contribute towards additional facilities,” the Local Plan should include a clear methodology for assessing educational need arising from new development or refer to previous work that has been done in this regard. Paragraph 2.12 of the Framework Plan Evidence Base refers to Hertfordshire County Council's Pupil Yield Study and the associated methodology available on the Council's website. Key elements of this methodology should be incorporated into the policy to provide transparency and certainty for developers.

2.6.7 Draft Policy ID1 (CD01.1), addresses developer contributions and states that “all new development will be required to provide for the necessary on-site and, where appropriate, off-site infrastructure requirements...” This statement needs to be linked to the proposed delivery plans but as we have previously mentioned, these currently don't provide sufficient clarity.

2.7 Question 3: What is the justification for requiring accordance with the IDP, which is a non-statutory document intended to be updated regularly by each Council?

2.7.1 Draft Policy HGC1 (CD01.1), states that “all major development in the HGC Programme Area must follow a planned and coordinated approach to growth and infrastructure in accordance with the Local Plan and HGC Infrastructure Delivery Plans, Hemel Garden Communities Spatial Vision, the supporting HGC Framework Plan evidence base including HGC Concept Plan, HGC Local Plan Policies and supporting SPDs and Design Codes.”



2.7.2 The Local Plan will be the statutory development plan and should contain sufficient information as to where and how development is to be delivered. Currently this is not the case. The 2025 Dacorum Infrastructure Delivery Plan (IDP) (IDV01.2), acknowledges that the IDP is a live document and will be updated as necessary. This approach aligns with the National Planning Policy Framework (NPPF) Footnote 38, which emphasise that anticipated delivery rates and infrastructure requirements should be regularly reviewed and reflected in updated policies. We support this approach and this is currently not the position.

2.7.3 Further information is necessary to ensure the policy's effectiveness and to provide sufficient information on where and how development is to be delivered.

2.8 Question 4: 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?

2.8.1 The Transformation Supplementary Planning Document (SPD) to our knowledge, it has not yet been published for public consultation. We recognise that the SPD is to define the spatial framework, design principles, and infrastructure necessary for the transformation of the Growth Area (HGC01.2). Given its role in guiding development throughout the area, it is essential that the details of this document are published at the earliest opportunity.

2.8.2 The HGC Framework Plan is regarded as supporting the Local Plan and providing further clarity on the application of the relevant policies in the plan without creating new or different policy. According to Document HGC02.1, its purpose is to evaluate and inform the policies and allocations within the draft Development Plans, ensuring that proposals are appropriate for the allocated sites and have a feasible prospect of delivery. While we support this objective, we believe that the allocations outlined in the draft Local Plans lack sufficient detail regarding infrastructure provision, particularly concerning the specific responsibilities assigned to developers for delivering various forms of infrastructure.



2.9 Issue 5 – Growth Area Principles

3. 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.

2.10 Question 1: Are those policies clearly written and unambiguous so it is evident how a decision-maker should react to development proposals? Are all element directive in terms of decision-taking, and clear and effective.

2.10.1 Draft Policy LG3 (LPCD 02.01) within St Albans Draft Local Plan and Dacorum’s Draft Policy HGC2 (CD01.1), have the same set of criteria, however, Draft Policy HGC2 has an additional criterion identified as ‘n’ comprising “a fabric first approach contributing towards the delivery of net zero homes.” This is combined with criteria ‘m’ within the St Albans Draft Policy LG3.

2.10.2 Our comments on these criteria are as follows. Please note we have not commented on all of them just the ones that we consider are not clear or effective and further review and revision:

Pillar 1 – Green Network

2.10.3 In relation to criteria (a), which seeks for proposals to achieve and aim to exceed a minimum of 10% Biodiversity Net Gain (BNG), we consider this wording inconsistent with the statutory framework governing biodiversity net gain. The statutory objective is for developments to deliver at least a 10% increase in biodiversity value. The requirement to exceed this threshold extends beyond the established framework. Accordingly, we recommend that the criteria be revised for greater clarity, as follows: “Proposals should achieve a minimum of 10% BNG and, where desired, seek to exceed this minimum requirement.”



2.10.4 In relation to criteria (d), which aims to ensure a 'landscape-led' development with the 'early delivery of open space and structural landscaping,' we consider these requirements to be unduly onerous and not aligned with the specific characteristics and constraints of individual sites and developments. Given the constraints of construction programming and build sequencing, it may not always be feasible to provide open space and structural landscaping at an early stage. Consequently, we consider that this requirement be removed. Instead, the use of planning conditions to secure the delivery of open space and landscaping prior to the occupation of the development would represent a more pragmatic and effective approach.

2.10.5 Regarding criterion (e), which aims to implement the key and local transport networks as outlined in the HGC Transport Vision & Strategy document, the requirement is currently overly broad. Furthermore, as demonstrated in the Framework Plan (HGC02.1), the exact alignment of the STC remains undecided. Additionally, there is no clear indication within the supporting evidence of which land parcel within the Growth Area or who is responsible for delivering these interventions. Consequently, we consider the current wording and associated requirements to be unduly burdensome and ineffective. Further cross-boundary collaboration needs to be undertaken to thoroughly review and clarify the infrastructure delivery obligations. Likewise (g) requires the provision of high-quality bus priority, bus, cycle and walking network, infrastructure and wayfinding. This is too ambiguous and lacks clarity as to delivery.

Pillar 2 – Integrated Neighbourhoods

2.10.6 Criteria (d) states that the east and north Hemel Hempstead Growth Area STC must be delivered in a coherent and integrated approach. We agree with this position, however, there appears to be a lack of clarity over the details of the STC and a lack of evidence over cross-boundary partnership in bringing forward this strategic road network.

2.10.7 Given the foregoing, we consider that in general the policies are appropriate but certain require adjustment to support clarity and to make them effective.



Pillar 4 – Engaged Communities

- 2.10.8 Criteria (c) states “proposals should identify appropriate funding and a variety of income-generating community assets to secure long-term funding, maintenance, management and stewardship arrangements;” This requirement lacks clarity and needs to be refined to specify its applicability to particular types of development, as well as to clearly identify which forms of development are obligated to contribute to this funding.

2.11 Question 2: Are Policies LG3 and HGC2 suitably flexible so as to apply only to relevant types of development?

- 2.11.1 The wording of policy HGC2 as a whole is not suitably flexible so as to apply to relevant types of development only. The prefix to the policy states “to enable the transformation of Hemel Hempstead, the design and delivery of HGC Growth Areas within the HGC Programme Area are required to adhere to the following....” This is not flexible, and as currently drafted, may be interpreted as applying to all development proposals. Greater clarity is required to ensure that it specifically pertains to proposals of a scale and significance appropriate to the criteria outlined. Please see our response to Question 1 for further information.

2.12 Question 3: What is the justification for requiring compliance with ‘future HGC guidance’ in Policy LG3/HGC2? Is this clear, justified and effective?

- 2.12.1 Requiring adherence to forthcoming, unpublished guidance which has not yet been issued for public consultation nor examined introduces uncertainty and could undermine the clarity and effectiveness of the policy. Also, the development plan is the primary document and other documents must only assist in providing further detail as to the application of the development plan without adding new or different policy. We are aware that planning applications are currently advancing on the eastern side of the Growth Area, which will not be subject to the forthcoming HGC guidance. Consequently, it is unreasonable to expect emerging allocations, including draft HM01, to be subject to this additional layer of policy consideration.



2.13 Issue 6 – Viability and Deliverability

2.14 Question 1: 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?

2.14.1 We welcome receipt of the authorities' comments in relation to this matter.

2.14.2 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.

2.14.3 It is important to note that, the Kitewood land at Holtsmere End Farm, located to the north east of Hemel Hempstead (within the Growth Area) is deliverable within the first five years of the Plan as it can be accessed from the west (via other landownerships within HM01) or the east (via H1 where it is understood that a planning application is currently being progressed). However, further clarification on the implementation of the STC either in full or in part is required.

2.15 Question 2: 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?

2.15.1 We welcome receipt of the authorities' comments in relation to this matter.