## **Matter 6 – Hemel Garden Communities ('HGC')**

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 the 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 Plan Figure 3.1 and Dacorum Plan Figure 7.

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 the HGC is and which areas it relates to?

What is the difference between the HGC Programme Area and the HGC Framework Plan area?

- 1.1 The Hemel Garden Communities "HGC" Programme Area is outlined in St Albans Local Plan Part A (LPCD 02.01) paragraphs 3.34 to 3.38 and in accompanying Figure 3.1 HGC Programme Area.
- 1.2 The HGC Programme Area includes land in St Albans District and Dacorum Borough. It encompasses the whole of the existing town of Hemel Hempstead, its two Opportunity Areas (Town Centre and Two Waters), the employment areas of Maylands Business Park (and the proposed employment land which forms part of the Hertfordshire Innovation Quarter located to the East of Maylands Business Park), as well as proposed "Growth Areas" ("HGC Growth Areas") which broadly consist of land to the east and north of Hemel Hempstead within St Albans District and Dacorum Borough.
- 1.3 The HGC Delivery Statement (Nov 2024) (HGC 02.01) (pages 6-7) explains this further:

"The HGC Programme Area map shows the area of influence of the Hemel Garden Communities programme which includes:

- The existing Hemel Hempstead Town Centre Opportunity Area and whole town of Hemel Hempstead, including strategic sites at Polehanger Lane and Land at Shendish Manor and Fairfields;
- The proposed Growth Areas to the north and east of the town which falls within both Dacorum and St Albans Local Authority land boundaries. This includes the permitted schemes at Spencer's Park and Marchmont Farm;
- The employment areas of Maylands Business Park and the proposed employment land which forms part of the Hertfordshire Innovation Quarter

(Herts IQ)\* and is located to the East of Maylands Business Park;

- Two Waters Opportunity Area."
- 1.4 The HGC Programme Area is wider than the HGC Framework Plan area. The HGC Framework Plan specifically relates to the identified HGC Growth Areas, where growth of around 11,000 homes specifically on the edge of Hemel Hempstead is planned. This is explained in St Albans Local Plan Chapter 3, paragraph 3.46 where it states:

The HGC Growth Areas are supported by the HGC Framework Plan, a suite of evidence providing a single, holistic spatial and infrastructure framework for the whole of the HGC Programme Area, with a detailed focus on the North and East of Hemel Hempstead Growth Areas (Figure 3.2). The wider HGC studies and strategies have shaped the Framework Plan.

- 1.5 St Albans Local Plan Figure 3.1 'HGC Programme Area' identifies within the Programme Area the 'North and East Hemel Hempstead Growth Areas Boundary' as shaded in a yellow/orange colour. That yellow/orange area is the area to which the Framework Plan applies, as can be seen by Figure 3.2 'Indicative Concept Plan for the HGC Growth Areas' and the cross-reference to it at 3.46.
- 1.6 The HGC Growth Areas are supported by the HGC Framework Plan, a suite of evidence providing a single, holistic spatial and infrastructure framework for the HGC Programme Area, with a detailed focus on the North and East of Hemel Hempstead Growth Areas (Indicative Concept Plan for HGC Growth Areas HGC 04.01). The wider HGC studies and strategies have shaped the Framework Plan.

Is it sufficiently clear in both the St Albans Local Plan, and the Dacorum Local Plan, what the HGC is and which areas it relates to?

1.7 The Council considers the approach is sufficiently clear in the St Albans Local Plan to 2041 what the HGC is and which areas it relates to. However, if the Inspectors consider that the St Albans Local Plan to 2041 would benefit from further clarity on this point, then the Council is open to suggested minor modifications to the supporting text and/or including a revised map to make this more explicitly clear.

Q2 To be effective, should both Local Plans include a breakdown, in policy, which sets out the component parts of the HGC and what is expected from each parcel?

2.1 The Council considers that the St Albans Local Plan to 2041 is sufficiently clear in terms of its breakdown and setting out of the component parts of Hemel Garden Communities and what is expected from each parcel.

- 2.2 The St Albans Local Plan Part A (LPCD 02.01) includes overarching policies (LG2 and LG3) that have been prepared jointly with Dacorum Borough Council, which apply consistently across the HGC Programme Area.
- 2.3 The overarching HGC policies in the Plan are supplemented by Table 3.1 which sets out, as part of the supporting text, the main land uses for each Broad Location in St Albans District.
- 2.4 The Plan sets out the key component parts under the heading Key development requirements, in Part B for sites H1-H4, which form part of the Plan's policies through clause c) of Policy LG1 which says:

Proposals within the defined Broad Locations (or unallocated windfall development at this scale) must:

. . .

- c) Demonstrate accordance with Local Plan polices and the requirements set out in Part B;
- 2.5 Furthermore, INF 01.01 SADC Infrastructure Delivery Plan (2024) and INF 01.02 Appendix A.1 SADC Infrastructure Schedule (2024) sets out and identifies the specific infrastructure requirements in regard to each allocation. The SADC IDP will be updated throughout the Plan period in response to updates from Infrastructure Providers and updates to requirements.
- 2.6 Together, policies LG1, LG2 and LG3, Part B of the Local Plan, Table 3.1 and the SADC IDP set out clearly, the component parts of the HGC within the St Albans District, and what is expected from each of the four parcels in the District.

# Q3 How do the sites at Marchmont Farm, Spencer's Park, land west of Hemel Hempstead land adjacent to the Manor Estate relate to the growth proposed at HGC?

- 3.1 Please see the Dacorum Borough Council's answer for a detailed response to this question.
- 3.2 The sites at Marchmont Farm, Spencer's Park, land west of Hemel Hempstead, and land adjacent to the Manor Estate were sites identified in Dacorum Borough Council's previous Core Strategy (adopted 2013) and subsequent DBC Site Allocations Development Plan Document (DPD). The sites are presented in Figure 16 of the HGC 02.01 Delivery Statement update (Nov 2024).pdf.
- 3.3 Broadly speaking, while they fall within the HGC Programme Area, these sites are at more advanced stages in the planning process. Further details on these sites are set out below and also discussed in the HGC Delivery Statement (HGC 02.01).

- 3.4 **Marchmont Farm** (19/02749/MOA), within Dacorum, is owned by Homes England and was identified in the 2018 Hemel Garden Communities bid to MHCLG as falling within the HGC red line boundary and forming early delivery of the wider HGC proposals. As such, it will set the precedent for high quality design, aligned to the HGC Spatial Vision (HGC 03.01). It is carried forward to the DBC Local Plan as Hm14 allocation, with the site received a resolution to grant planning permission on 3 July 2025, subject to a s.106 agreement.
- 3.5 Homes England, as the Marchmont Farm and Spencer's Park landowner, have been a key stakeholder in HGC Programme. Marchmont Farm are also the gateway to the main HGC new development within Dacorum, with an aim to maximise the potential for sustainable and active travel north-south between the existing town and the DBC North Hemel Hempstead Growth Area (Hm01).
- 3.6 **Spencer's Park** (4/02539/16/MOA and 21/01517/RES), owned by Homes England, sits within both the Dacorum and St Albans District areas (although the majority of the site lies within Dacorum) and has planning consent. It was included within the HGC red line boundary and has formed early delivery of the wider HGC proposals. Although the site received permission prior to the HGC Spatial Vision (HGC 03.01), it remains broadly consistent with it. The majority of the site is under construction. The final phase of development received a resolution to grant permission on 3 July 2025.
- 3.7 For SADC, In Spencer's Park Phase 2 180 homes are within the District (Outline permission reference 5/2016/2845, which has a current reserved matters application 5/2024/0927). Spencer's Park Phase 2 is included within the permissions (estimated future completions) category of the updated Local Plan housing trajectory, as presented in the Council's response to Matter 2 Issue 1 Question 1 (see Table 1). The estimated build out rates for permission 5/2016/2845 are set out in Matter 2 Issue 1 Question 1 Appendix 1 (see page 12).
- 3.8 Land adjacent to the Manor Estate and Land West of Hemel Hempstead are sites with planning consent that are within the HGC Programme Area and are currently being delivered. Land adjacent to the Manor Estate is almost completed, subject to a variation of condition application (24/01465/ROC) which was approved on 21 August 2025 to deliver the final 30 dwellings. The delivery of Land West of Hemel Hempstead was delayed due to the need to identify a SANG solution. This has now been resolved, and the site is now under construction. The final phase (24/02645/RES) received a resolution to grant permission on 18 September 2025 and a decision is expected to be issued shortly.

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

4.1 The scale of development was an iterative process informed by evidence prepared by the Council, as well as feedback received through consultation and stakeholder engagement. HGC as a large-scale opportunity for growth has been a longstanding proposal for many years, as demonstrated by the award of Garden Town Status in 2018. The HGC 02.01 - Delivery Statement - update (Nov 2024) on page 3 sets out the bid for Garden Town Status:

#### Garden Town Status

In November 2018, a Hemel Garden Communities bid was submitted to the Ministry for Housing, Communities and Local Government (MHCLG). The bid was prepared by the three authorities, alongside Hertfordshire LEP, Herts IQ and The Crown Estate. The bid was successful and Hemel Hempstead was awarded 'Garden Town' status to develop HGC. The HGC Programme looks beyond the emerging Local Plan period to a longer timeframe of 2050. The HGC proposal is recognised by Government and a grant was awarded in 2019 to help develop garden communities of the future.

- 4.2 As set out in more detail in answer to M6l1Q5 below, which also lists the relevant evidence documents that helped determine the scale of development; the Green Belt and in particular potential long term Green Belt boundaries were a significant factor in establishing broadly the scale of potential development. In this District, in simple terms, the M1 to the east and the large overhead power transmission line and pylons set clear boundaries that informed the realistic scale of potential growth. As also set out in more detail in answer to M6l1Q5 below, the Chilterns National Landscape was also a significant factor in establishing long term limits to growth to the north of Hemel Hempstead, which impacted the scale of potential development.
- 4.3 The scale of development has also been shaped by the integration of strategic green infrastructure, including in particular the proposed Country Park and wider Green Belt buffer to provide the necessary long term green separation between Hemel Hempstead and Redbourn.
- 4.4 In the context of these broad parameters influencing the scale of growth, basic capacity testing was undertaken. The general basis was the same as that set out in HOU 01.02 SADC Housing Land Supply, Windfall and Housing Capacity Evidence Paper (2024). This includes:

#### 7. Housing capacity

7.1. The indicative residential capacity calculations for the majority of sites were informed by the approach in the Council's Housing and Economic Land Availability Assessment (HELAA) report 2021 and Urban Capacity Study 2022 (UCS). The calculations for the Green Belt site allocations are in accordance with the "Estimating Development Potential of Housing Sites" section of the HELAA report (paragraphs 3.29 – 3.34).

7.2. The exception to this is at Hemel Garden Communities for the site allocations H1, H2, H3 and H4 where there is a bespoke approach reflecting the unique scale of the project and additional technical work over several years that has been undertaken through the HGC Programme. The HGC Framework Plan and accompanying evidence documents, consider the site constraints and demonstrate compliance of the policy position of making efficient use of land and reflect a minimum overall net density of 40 dwellings per hectare, which is consistent with the approach for other Green Belt allocations.

. . .

7.4. For the Green Belt sites, justification for the assumption of 40 dwellings per hectare (dph) density is set out in the HELAA report (paragraph 3.30), with reference to the Council's previous Residential Density Report 2014. The 40dph is consistent and does not change to account for different density of adjacent development, in order to ensure efficient use of land and to minimise the amount of Green Belt land that is released. This is in line with the approach in the NPPF 2023 which sets out that, where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.

. . .

- 7.6. In terms of the 'Site Area' to use for the Table 1 calculations; the area of some of the allocation sites was reduced to take account of required infrastructure or constraints to development potential, through planning judgment, in line with the approach in HELAA report para's 3.37-3.39. Such constraints may include trees, flood zones, setting of heritage assets, other physical characteristics of a site.
- 4.5 The Housing and Economic Land Availability Assessment (HELAA) report 2021 (HELAA 01.01) sets out:
  - 3.31 This simple 40 dph calculation makes no specific allowance for infrastructure and major open space in larger development areas. To take into account allowances for infrastructure on larger sites, the Residential Density Report sets out only 60% of the site will be considered usable for residential, with 40% would be required to provide infrastructure, main roads, open space and public facilities.
- 4.6 As the HGC project has progressed, there has been capacity-testing undertaken as part of the Framework Plan work (Documents HGC 04.01 HGC 04.05) and elsewhere that has confirmed that the proposed scale of development is realistic. This scale of development has been further tested in the preparation of the planning applications through the PPA process for both H1 North Hemel and H2-H4 East Hemel, which have confirmed that they are realistic.

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

- 5.1 The Green Belt and proximity of the Chilterns National Landscape, amongst other factors, have been a significant consideration and have informed decisions from the outset about growth at Hemel Hempstead.
- 5.2 The factors informing these aspects of growth around Hemel Hempstead have been considered in the evidence submitted to date. This includes:
  - LPSS 02.03 Green Belt Sites Recommended HGC Proformas (2024)
  - GB 04.03 Green Belt Review Sites and Boundary Study December 2013 (superseded)
  - GB 02.02 Green Belt Review Report (2023)
  - GB 02.03 Green Belt Review Annex Proforma Report (2023)
  - LPCD 03.01 St Albans Local Plan Sustainability Appraisal Report (2024)
  - EDH 05.01 Landscape Visual Impact Appraisals Broad Locations SADC Local Plan Sites (2024)
  - EDH 09.01 Herts Landscape Character Area Statements St Albans District
  - HGC 04.03 Framework Plan Technical Evidence Report (2024)
  - HGC 04.02 Framework Plan Story Document (2024)
  - HGC 07.01 Green Infrastructure Strategy Final Draft (2024)
  - HGC 07.02 North Hemel Landscape Study Main Report (2024)
- 5.3 Wider factors have also been considered, through the following evidence documents:
  - EDH 04.01 Heritage Impact Assessment Draft Cover Report (2024)
  - EDH 04.02 Heritage Impact Assessment Appendix 1 Hemel Garden Communities (2024)
  - LPCD 04.01 Habitats Regulations Assessment (2024)
- 5.4 The proposed boundary alterations have been informed by the supporting evidence, including the Green Belt assessments and site selection methodology. The Sustainability Appraisal also addresses the case for boundary alterations as set out in the overall conclusions.
- 5.5 For SADC, Green Belt assessments include SADC Green Belt Review Report GB 02.02 (2023), Green Belt Review Proforma Annex Report GB 02.03 (2023) and LPSS 02.03 Green Belt Sites Recommended HGC Proformas (2024).
- 5.6 The Site Selection document LPSS 02.03 conclusions are set out below for each site allocation.
- 5.7 For Site H1, the site was considered in the round in the site selection work, which included contextualising and balancing the results of the Green Belt Review with other factors. For this location, the site selection outcome is set out across a proforma assessment (C-097) on pages 2 to 4 in LPSS 02.03 Green Belt Sites Recommended HGC Proformas. This is set out in particular in the Qualitative Assessments:

The site is not recommended for further consideration by the Green Belt Review Stage 2 Report...

This site adjoins Hemel Hempstead which is a Tier 1 Settlement. It offers a comprehensive range of very significant Economic, Environmental and Social benefits including; housing, affordable housing, a 8 FE secondary school, a 3FE primary school, a Country Park, a significant scale of sustainable transport improvements and employment provision.

Further it supports the comprehensive approach to the delivery of the Hemel Garden Communities programme, including joint work with Dacorum BC to deliver Duty to Cooperate outcomes and support delivery of their new Local Plan and the regeneration of Hemel Hempstead.

As part of the overall HGC programme there are considerable further benefits including supporting delivery of schools, sports and health facilities and around 10,000 jobs across HGC and the Hertfordshire Innovation Quarter.

This site is recommended to progress.

- 5.8 For Site H2, the site was considered in the round in the site selection work, which included contextualising and balancing the results of the Green Belt Review with other factors. For this location, the site selection outcome is set out across two proforma assessments (Site Part of M-033) on pages 5 to 7 in LPSS 02.03 Green Belt Sites Recommended HGC Proformas. This is set out in particular in the Qualitative Assessments the same conclusions as those for H1.
- 5.9 For Site H3, the site was considered in the round in the site selection work, which included contextualising and balancing the results of the Green Belt Review with other factors. For this location, the site selection outcome is set out across a proforma assessment (Part of M-033) on pages 8 to 10 in LPSS 02.03 Green Belt Sites Recommended HGC Proformas. This is set out in particular in the Qualitative Assessments the fact that the site was recommended for further consideration by the Green Belt Review Stage 2 Report and then came to the same conclusions as those for H1 and H2.
- 5.10 For Site H4, the site was considered in the round in the site selection work, which included contextualising and balancing the results of the Green Belt Review with other factors. For this location, the site selection outcome is set out across a proforma assessment (Site Part of M-033) on pages 11 to 13 in LPSS 02.03 Green Belt Sites Recommended HGC Proformas. This is set out in particular in the Qualitative Assessments the fact that the site was recommended for further consideration by the Green Belt Review Stage 2 Report and then came to the same conclusions as those for H1, H2 and H3.

5.11 The Levelling-up and Regeneration Act 2023 places a duty on the Chilterns National Landscape. The NPPG¹ sets out:

### The Protected Landscapes duty

. . .

Section 245 (Protected Landscapes) of the Levelling-up and Regeneration Act 2023 (LURA) amends the duty on relevant authorities in respect of their functions which affect land in National Parks, National Landscapes, and the Norfolk and Suffolk Broads (collectively referred to as Protected Landscapes) in England. Relevant authorities must now 'seek to further' the statutory purposes of Protected Landscapes. This replaces the previous duty on relevant authorities to 'have regard to' their statutory purposes.

. . .

### What a relevant authority should do

The duty is an active duty, not passive, which means:

as far as is reasonably practical, relevant authorities should seek to avoid harm and contribute to the conservation and enhancement of the natural beauty, special qualities, and key characteristics of Protected Landscapes

5.12 Relevant impact considerations are set out in the EDH 05.01 - Landscape Visual Impact Appraisals Broad Locations SADC Local Plan Sites (2024), which also draws upon EDH 09.01 - Herts Landscape Character Area Statements St Albans District and sets out on page 4:

#### Stage 2 – Desk Study

16. With regards to the Hemel Garden Communities location (H1, H2, H3, and H4) the appraisal also drew on the 'North Hemel Hempstead Landscape Assessment.

5.13 For Site H1, EDH 05.01 page 10 sets out:

#### Intervisibility with Chilterns National Landscape

Potential intervisibility between edge of Chilterns NL and upper slopes along the northern edge of the site.

5.14 For Site H1, EDH 05.01 page 10 then sets out to conclude the following:

## <u>POTENTIAL DEVELOPMENT EFFECTS</u> <u>Designated Landscapes</u>

There is no intervisibility with the Chilterns National Landscape

<sup>&</sup>lt;sup>1</sup> <a href="https://www.gov.uk/government/publications/the-protected-landscapes-duty/guidance-for-relevant-authorities-on-seeking-to-further-the-purposes-of-protected-landscapes">https://www.gov.uk/government/publications/the-protected-landscapes-duty/guidance-for-relevant-authorities-on-seeking-to-further-the-purposes-of-protected-landscapes</a> (Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes)

5.15 For Site H2, EDH 05.01 page 16-17 sets out:

Intervisibility with Chilterns National Landscape - N/A

5.16 For Site H2, EDH 05.01 page 17-18 then sets out to conclude the following:

<u>POTENTIAL DEVELOPMENT EFFECTS</u> <u>Designated Landscapes</u> - N/A

5.17 For Site H3, EDH 05.01 page 21 sets out:

Intervisibility with Chilterns National Landscape - N/A

5.18 For Site H3, EDH 05.01 page 21-22 then sets out to conclude the following:

<u>POTENTIAL DEVELOPMENT EFFECTS</u> <u>Designated Landscapes</u> - N/A

- 5.19 For site H4, EDH 05.01 did not assess potential development effects on the Chilterns National Landscape as it is so far away.
- 5.20 The HGC 04.02 Framework Plan Story Document (2024) sets out on page 33:

The green network should include:

. . .

Conservation and enhancement of the local landscape character (including the Chilterns National Landscape setting), townscapes, green valley swathes and heritage assets.

5.21 The HGC 04.03 - Framework Plan Technical Evidence Report (2024) sets out on page 32:

The site is within the setting of the Chilterns National Landscape, which imposes a responsibility to carefully consider the form and limits of new development.

- 5.22 The HGC 07.01 Green Infrastructure Strategy Final Draft (2024) sets out:
  - 2.5.14 Opportunities to create and maintain rich, wide and well-connected biodiverse buffers (HGC Green Network spatial principle 7) will be considered throughout the HGC Programme Area to mitigate visual and acoustic impacts of new development and transport infrastructure on sensitive receptors, particularly for new communities associated with the HGC Growth Areas. These include:
  - Early structural tree planting to create a multi-functional wooded landscape buffer, incorporating community and outdoor recreation uses, will be considered to mitigate the visual impact of urban development within the north HGC Growth Area on sensitive views from the Chilterns National Landscape. The design of this green buffer to provide screen planting for protecting the setting of the

Chilterns National Landscape should use appropriate tree species, and be informed by the recommendations of the HGC Landscape & Visual Impact Assessment.

. . .

- 2.5.112 Where SANG in the HGC Growth Areas is also intended to fulfil an additional function as a green buffer for protecting the setting of the Chilterns National Landscape, the design will consider incorporating woodland belt planting of appropriate tree species to provide screening to mitigate the visual impact of new development.
- 5.23 Relevant impact considerations are set out in the HGC 07.02 North Hemel Landscape Study Main Report (2024). The HGC landscape study parcels related to site H1 are Parcel F Revel End Slopes and Parcel G Upper Vea Valley. Page 39, is reflected on the Map as illustrated on Page 40 that:

#### DESIGN DEVELOPMENT

7.4 Analysis has led to the following conclusions. Development should be focused on the least sensitive areas, namely Assessment Parcels ... F.

. . .

7.4 Parcel G already contains a considerable amount of development and its few remaining open fields are important in maintaining the sense of separation between Hemel Hempstead and Redbourn.

. . .

7.5 Development within Assessment Parcels ... F should utilise retained and enhanced landscape structure to provide a framework for built form.

. . .

- 7.7 The eastern end of Assessment Parcel F (east of the pylons) continues to fall primarily eastwards and is generally set down and more contained than the higher slopes to the north-west of Little Revel End, and the adjoining existing development either side of the lane to Little Revel End could form a logical eastern edge to development. However, the primarily undeveloped nature of Assessment Parcel F can be appreciated from Hemel Hempstead Road and this helps maintain the separate identities of Redbourn and Hemel Hempstead.
- 5.24 HGC 07.02, page 53 concludes that:

#### CONCLUSIONS

10.1 The study area sits within an undulating landscape with a strong existing landscape framework. Woodland and tree belts are characteristic of the wider landscape, which provides opportunity for successful mitigation strategies that could assimilate a settlement into the wider landscape over time. This would reflect the existing approach to the settlement edge of Hemel Hempstead.

..

10.4 ... Given its location and existing mixture of development, it is envisaged that the potential development extent would not extend into the Upper Vea Valley (Parcel G).

- 10.5 ... the extent of development within the Revel End Slopes (Parcel F) should avoid weakening the separate identities of Hemel Hempstead and Redbourn and by limiting landscape and visual effects to 'Moderate' adverse, through detailed design development, including a robust mitigation strategy.
- 10.9 The potential for the land at the edges of the allocation to be secured as SANG, would also offer the ability to provide compensatory improvements to the remaining Green Belt (in line with paras 147 and 150 of the NPPF), including an increase in environmental quality, accessibility and recreation potential. A revised boundary would continue to protect the setting to the Chilterns National Landscape (AONB), through the retention of Green Belt land, which could also be secured as SANG, providing meaningful alternatives to the Beechwoods SAC in close proximity to a major urban area, along with compensatory enhancements to the Green Belt.
- 5.25 HGC 07.02 sets out the consultation response from Natural England on page 12:
  - 4.6 During consultation, Natural England advocated that the special qualities of the AONB should be considered within any assessment of the potential effects of the allocation on the setting to the Chilterns.
- 5.26 The LPCD 03.01 St Albans Local Plan Sustainability Appraisal Report (2024) sets out:
  - 2.3.1 St Albans City and District lies within the south west of the county of Hertfordshire. To the west is Dacorum Borough, including Hemel Hempstead (which abuts St Albans District) and an extensive area designated as part of the Chilterns National Landscape (formerly AONB).
  - 5.4.17 ... A key concern raised is that HGC would "impact hugely" on the Chilterns National Landscape (formerly AONB). This is obviously a key sensitivity / issue explored further below, but an important point to note here is that the Chilterns AONB Board did not respond to the consultation in 2023. Also, support for HGC to the east and northeast of Hemel Hempstead potentially serves to reduce pressure on the part of the HGC area to the north, which is likely the most sensitive in landscape / National Landscape terms
  - 5.4.17 ... The suggestion is that HGC would result in "effective coalescence" of Hemel Hempstead and Redbourn, but it is clear that a substantial green buffer would be retained through planting and provision of green spaces including the Country Park and SANG (see Figure 5.8), a separation of at least 1.5km between the built development of HGC and Redbourn's settlement edge being retained. Having said this, the proposed western expansion of Redbourn is noted (see discussion below), and it is also recognised that there is some built form within the propose green buffer.

5.27	Overall, the Green Belt and proximity of the Chilterns National Landscape have been a significant consideration, have undergone significant assessment and have informed decisions regarding growth of Hemel Hempstead from the outset.