

Matter 6 – Hemel Garden Communities ('HGC')

Issue 2 – Site Boundaries (including Green Belt alterations)

Q1 Having established at a strategic level that alterations were necessary to the Green Belt boundary, how did the Councils determine the extent of alterations required?

- 1.1 For SADC, having established that exceptional circumstances existed for the alteration of Green Belt boundaries, the general extent of the alterations was determined primarily by the quantum of unmet housing need arising, balanced primarily against Green Belt and the Chilterns National Landscape. The scale of necessary alterations to Green Belt boundaries considered the capacity of sites within settlements, and the capacity of sites on previously developed land in the Green Belt (under paragraph 148g of the 2023 NPPF) compared to the local housing need requirement as determined by the Standard Method of paragraph 61 of the 2023 NPPF. The total capacity of these sites are set out in Table 1 below:

Table 1: Total capacity of sites with permission, within settlements or on previously developed land in Green Belt

Category	Dwellings (Net)
Permissions	2,365
Permissions lapse assumption	-189
Windfall allowance	2,103
Harpenden NP allocations	57
Green Belt PDL allocations	137
Urban HELAA allocations	43
Urban UCS allocations	860
Total Supply (Stage 1)	5,376

- 1.2 The extent of alterations to GB boundaries was further refined after all sites recommended for further consideration in the Stage 2 Green Belt Review (GB 02.02) had been assessed for potential allocation, leading to the proposed allocation of 40 sites as set out in SADC's hearing statement for M3I2Q4 of Stage 1 hearings. Together these 40 sites, along with sites within settlements and sites on previously development land in the Green Belt, do not meet the local housing requirement as determined by the Standard Method, and further alterations to Green Belt boundaries would be required to meet that need. The total capacity of 40 sites recommended for further consideration are set out in Table 2 below:

Table 2: Total capacity of sites recommended for further consideration in the Stage 2 Green Belt Review, and allocated in the draft Local Plan

Category	Dwellings (Net)
Large site allocations	385

Medium & small site allocations	851
Broad Locations (excluding H1, H2, H4, B1 and B4) ¹	2,658
Total Supply (Stage 2)	3,894

- 1.3 As set out in the Local Plan Site Selection Proforma Methodology Paper (LPSS 02.02):

1.31 Some Green Belt sites that were not recommended for further consideration by the Green Belt Stage 2 were recommended to progress by the proformas due to the location of the site next to a Tier 1 or 2 settlement and the potential of the site to deliver a wide range of significant Economic, Environmental and Social benefits including housing, affordable housing, schools, and a significant scale of sustainable transport improvements and jobs.

1.32 Those sites within the Hemel Garden Communities (HGC) area will also support a comprehensive approach to the delivery of HGC including joint work with Dacorum BC to deliver Duty to Cooperate outcomes. 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.

- 1.4 The overall extent of alterations required was determined by consideration of unmet need still arising. This is set out in Table 3 below:

Category	Dwellings (Net)
Total Plan requirement	14,603
Total capacity of sites with permission, within settlements or on previously developed land in Green Belt	5,376
Total capacity of sites recommended for further consideration in the Stage 2 Green Belt Review, and allocated in the draft Local Plan	3,894
Residual unmet need (Total plan requirement minus sites with permission, sites within settlements, previously developed land in the Green let, and sites recommended in the Stage 2 Green Belt Review)	5,333

- 1.5 For Hemel Garden Communities specifically, the extent of alterations required took into account the availability and suitability of land for development, factoring in the availability and suitability of land in the other Tier 1 and Tier 2 settlements (St Albans and Harpenden) that could also deliver a wide range of significant economic, environmental and social benefits. Consideration was also given the amount of land required to support the delivery of jobs in Hemel Garden Communities, supporting both SADC and DBC.

¹ For simplicity of the calculation sites B4, H2 and H4 have been excluded in their entirety. Parts of those sites were recommended for further consideration in the Stage 2 Green Belt Review, but not the entire allocation.

- 1.6 For SADC, in simple terms, the extent of alterations required following essentially the same process as for all other Green Belt allocations, just on a larger scale, with more stakeholders and in greater detail. The Green Belt Review work looked at potential Green Belt impacts and potential long term Green Belt boundaries; potential long term GB boundaries were also considered through landscape work and Site Selection work. In parallel, work was undertaken regarding the whole suite of necessary infrastructure, transport modelling etc. This included work on the Framework Plan (Documents HGC 04.01 – HGC 04.05). Then the sites were considered in the round through the Site Selection work. Also, in parallel, there had been continuous engagement with key stakeholders throughout this process, including the landowners - The Crown Estate, Pigeon and Bloor – and stakeholders - HCC, Natural England, the Environment Agency etc. Further, in parallel, the potential impacts from the extent of the alterations required were considered through landscape work and the Sustainability Appraisal process.
- 1.7 Further detail is set out in the individual sites for H1-H4 at M617-10.
- 1.8 Overall, the general extent of the alterations was determined primarily by the quantum of unmet housing need arising, balanced against Green Belt, the Chilterns National Landscape and other factors, and followed essentially the same process as for all other Green Belt allocations, just on a larger scale, with more stakeholders and in greater detail.

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

- 2.1 The proposed boundary alterations are informed by the Green Belt Assessments and other technical work, including Landscape Visual Impact Appraisals, and brought together through the Site Selection work to form the concluded view on the allocations and their proposed boundaries.
- 2.2 Potential Green Belt impacts of development were considered. The specific localised Green Belt impacts are well understood because of the findings of GB 02.01 Green Belt Review (2024) and GB 02.03 Green Belt Review Annex Proforma Report (2023).
- 2.3 Potential Green Belt boundaries were considered in the Green Belt Review Proforma Annex Report (2023) (GB 02.03). For HGC sites H1 to H4, relating to sub-areas (from North to South) SA-172, SA-170 (covering site H1), SA-171, SA-169a, SA-169b, SA-168 (covering site H2), SA-167, SA-166 (covering site H3), SA-165, SA-164, (covering site H4).

- 2.4 EDH 05.01 - Landscape Visual Impact Appraisals Broad Locations SADC Local Plan Sites (2024) helped to provide an understanding of what other significant boundary features help inform potential long term Green Belt boundaries.
- 2.5 Site boundary features were also considered having regard to GB 04.03 - Green Belt Review Sites and Boundary Study December 2013 (superseded). Whilst this study only considered the adjoining land which encompasses Site H2, the review helped inform the approach taken on H1 with regard to a potential Green Belt boundary, forming a logical extension to the use of the significant electricity transmission and pylon lines as a long term GB boundary.
- 2.6 As set out in more detail in answer to M6I2 Q3 below, the proposed Green Belt boundaries of the HGC sites (H1-H4) are primarily based on physical features that are readily recognisable and likely to be permanent as long term defensible Green Belt boundaries.
- 2.7 The overall HGC boundaries within SADC include the M1 to the east and A4147 Hemel Hempstead Road to the south west. To the north east the boundary follows a significant electricity transmission pylon line. To the north the proposed Green Belt follows Holtsmere End Lane along the District boundary.
- 2.8 LPSS 01.01 - Local Plan Site Selection Methodology Outcomes and Site Allocations (23 Sep 2024) explains the rationale behind the outcomes of the Site Selection process, as to why H1-H4 (HGC) were chosen, including when the outcomes of the Green Belt Review concluded that some of the sub-areas within HGC were recommended for further consideration, but some were not recommended for further consideration:

3.22. Some Green Belt sites that were not recommended for further consideration by the Green Belt Stage 2 were recommended to progress by the Proformas due to the location of the site next to a Tier 1, Tier 2 or Tier 3 settlement and the potential of the site to deliver a wide range of significant Economic, Environmental and Social benefits including housing, affordable housing, schools, and a significant scale of sustainable transport improvements and jobs.

3.23. Those sites within the Hemel Garden Communities (HGC) area will also support a comprehensive approach to the delivery of HGC including joint work with Dacorum BC to deliver Duty to Cooperate outcomes. 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.

- 2.9 The Green Belt Sites Recommended HGC Proformas (2024) (LPSS 02.03) considered in the round each site H1-H4, which included contextualising and balancing the results of the Green Belt Review with other factors. For Site H1, 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. For Site H2,

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. For Site H3, the site selection outcome is set out across a proforma assessment (Part of M-033) on pages 8 to 10 in LPSS 02.03. For Site H4, 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.

2.10 Further detail on the proposed boundaries is set out in answer to Q3 below.

Q3 Are the proposed boundary alterations consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

3.1 Yes, the proposed boundary alterations are considered to be consistent with paragraph 148 e) and f) which states:

148. When defining Green Belt boundaries, plans should:

...

e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and

f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

3.2 The SADC Green Belt Review Report (2023) (GB 02.02) set out a clear approach to defining sub-area boundaries based on NPPF paragraph 143. (N.B The Green Belt Review Report GB 02.02 refers to NPPF paragraph 143 based on the NPPF 2021. This is the same as the NPPF paragraph 148 in the 2023 version). This is set out in section 4.3:

4.3 Step 2: Defining Sub-area Boundaries

Given the requirement through paragraph 143 of the NPPF for Green Belt boundaries to be defined 'clearly, using physical features that are readily recognisable and likely to be permanent', it therefore follows that sub-areas should be defined, to reflect these principles from the outset.

The Stage 2 sub-areas boundaries were defined in line with the general principles used to identify the Strategic Land Parcels in the Stage 1 GBR. However, as Stage 2 sub-areas are smaller than Stage 1 Parcels, a wider range of boundary features had to be used to delineate the sub-areas. In locations where readily recognisable and permanent boundary features were absent, sub-area boundaries had to be drawn along features which were readily recognisable, but not necessarily permanent. In some locations readily recognisable and permanent boundary features were present but a policy constraint such as a flood zone was closer to the settlement edge and was therefore adopted as the boundary, as development could not take place in the area between the policy constraint and prominent boundary feature.

Permanent and readily recognisable boundary features (both man-made and natural) are listed in the first column of Table 4.2. The additional readily recognisable boundary features which are not necessarily permanent are listed in the second column of Table 4.2.

Table 4.2 Boundary Features for Identifying Sub-areas

Permanent Man-made and Natural Features	Additional Boundary Feature
Motorways	Unclassified public and private roads
A and B Roads	Smaller water features, including streams and other watercourses
Railway lines	Prominent physical/topographical features, e.g. embankments
Canals	Existing development with strongly established, regular or consistent boundaries
Rivers and waterbodies	Well-established woodland edges, tree belts and hedgerows
Natural 'buffer' features such as ridgelines	

Sub-area boundaries were initially defined through desk-based assessments of publicly available data, including aerial photography, Ordnance Survey maps 'birds eye' views and Google Earth. Boundaries were adjusted as necessary, based on on-site observations during the site visits, to reflect the site characteristics as accurately as possible. This process of refinement accounted for the local context of the sub-area and involved an element of professional judgement. Each sub-area was assigned a unique reference number, (Figure 4.6 and 4.7).

- 3.3 Potential Green Belt boundaries were considered in the Green Belt Review Proforma Annex Report GB 02.03 (2023). For HGC sites H1 to H4, relating to sub-areas (from North to South) SA-172, SA-170 (covering site H1), SA-171, SA-169a, SA-169b, SA-168 (covering site H2), SA-167, SA-166 (covering site H3), SA-165, SA-164 (covering site H4).

Site H1 – North Hemel Hempstead

- 3.4 For site H1, the detail in GB 02.03 was only taken forward as it related to the northern boundary long Holtsmere End Lane, which is also the St Albans District / Dacorum Borough boundary.
- 3.5 For Site H1 relevant considerations are set out in the EDH 05.01 - Landscape Visual Impact Appraisals Broad Locations SADC Local Plan Sites (2024) regarding the significant electricity transmission line and pylons. Page 11 sets out:

SITE SPECIFIC MEASURES

...

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.

- 3.6 The site boundary was also considered having regard to GB 04.03 - Green Belt Review Sites and Boundary Study December 2013 (superseded). Whilst this study only considered the adjoining land which encompasses Site H2, the review helped inform the approach taken on H1 with regard to a potential Green Belt boundary, forming a logical extension to the use of the significant electricity transmission and pylon lines as a long term GB boundary.
- 3.7 GB 04.03 - Green Belt Review Sites and Boundary Study December 2013 (superseded) assessed Strategic Parcel GB21A (which includes Site H2, but excludes site H1), however there is a logical extension to the north leading into Site H1 using the same significant electricity transmission and pylon lines as the eastern GB boundary as was recommended by SKM in their Green Belt Review for Site H2 - East Hemel Hempstead (North).
- 3.8 GB 04.03, (referring to H2 - East Hemel North) describes electricity transmission lines and pylons with regards to assessing Strategic Parcel GB21A:

In order to assess potential development capacity, certain broad assumptions have been made and are applicable to all sub-areas, namely:

...

f) Certain sub-areas have physical constraints to development such as ... overhead power-lines

- 3.9 GB 04.03 then goes on further (referring to H2 East Hemel North) to describe the electricity transmission lines and pylons in Paragraph 3.5.8 and 3.5.9, on page 14 as:

Visual attributes including views within and outwards as well as the visual impact on adjacent development.

...

3.5.8 ... Overhead power lines cross the sub-area and comprise a conspicuous visual feature.

3.5.9 The nature of the landform and land cover means new development could comprise a conspicuous element. The existing landscape framework within the south-west part of the sub-area, including smaller field pattern provides a greater sense of enclosure and new development would be more discrete

- 3.10 Gb 04.03 then concludes (referring to H2 East Hemel North) with the following at paragraph 3.6.6 on page 16:

Boundary Review

...

3.6.6 The south-east part of the boundary does not follow a physical feature on the ground, but is aligned with a servitude (set back) from overhead electricity transmission lines. The rationale for this is that the overhead lines are likely to restrict development further east and the alignment of this part of the boundary would complement the proposed edge for sub-area 2.

3.11 Overall, for site H1 – North Hemel Hempstead, there are effectively two new proposed Green Belt boundaries in the Plan:

- Northern boundary – Holtsmere End Lane, which is also the District / Borough boundary and also provides an appropriate setback from the Chilterns National Landscape.
- Eastern boundary – Prominent physical feature – large electricity transmission line and pylons

Site H2- East Hemel North

3.12 For Site H2 relevant existing features are set out in the EDH 05.01 - Landscape Visual Impact Appraisals Broad Locations SADC Local Plan Sites (2024), including the significant electricity transmission line and pylons.

VISUAL BASELINE

Visual Character

- *There are few detracting features in this area. Despite its magnitude, the M1 has only a moderately negative visual impact, partially due to the fact the road is in cutting for much of its length through the plateau and partially due to the mature hedgerows that line the route. Overhead power lines have a widespread visual impact.*

3.13 The site boundary was also considered having regard to GB 04.03 - Green Belt Review Sites and Boundary Study December 2013 (superseded). The detail is as set out above at paragraphs 3.6-3.10.

3.14 Overall, for site H2 - East Hemel Hempstead (North), there is effectively one new proposed Green Belt boundary in the Plan:

- Eastern boundary – Prominent physical feature – large electricity transmission line and pylons

Site H3 – East Hemel Central

3.15 For site H3 - East Hemel Hempstead (Central), the Green Belt Review Proforma Annex Report (2023) (GB 02.03) relating to sub area SA-167 (page 738), SA-166 (page 734) sets out:

SA-167

Consideration of Boundaries

Commentary on boundary features and impact on Green Belt boundary strength
The inner boundary is predominately readily recognisable but less likely to be permanent. The outer boundaries are predominately readily recognisable and likely to be permanent.

SA-166

Consideration of Boundaries

Commentary on boundary features and impact on Green Belt boundary strength

Both the inner and outer boundaries are predominately readily recognisable and likely to be permanent.

- 3.16 For Site H3 relevant existing features are set out in the EDH 05.01 - Landscape Visual Impact Appraisals Broad Locations SADC Local Plan Sites (2024)

Strategy + Guidelines:

- *The M1 motorway dominates the plateau's length and the industrial urban edge also strongly influences the character of the area.*

- 3.17 For Site H3, East Hemel Hempstead Central, there is effectively one new proposed Green Belt boundary in the Plan:

- Eastern boundary – M1 Motorway

Site H4 – East Hemel South

- 3.18 For site H4, the detail in GB 02.03 was only taken forward as it related to part of the eastern boundary along the M1. The Green Belt Review Proforma Annex Report (2023) (GB 02.03) relating to sub area SA-165 (page 726) and SA-164 (page 722) sets out:

SA-165

Consideration of Boundaries

Commentary on boundary features and impact on Green Belt boundary strength

Both the inner and outer boundaries are predominately readily recognisable and likely to be permanent. If the sub-area was released, the new inner Green Belt boundary would meet the NPPF definition.

SA-164

Consideration of Boundaries

Commentary on boundary features and impact on Green Belt boundary strength

Both the inner and outer boundaries are predominately readily recognisable and likely to be permanent. If the sub-area was released, the new inner Green Belt boundary would meet the NPPF definition.

- 3.19 For Site H4 relevant existing features are set out in the EDH 05.01 - Landscape Visual Impact Appraisals Broad Locations SADC Local Plan Sites (2024):

Strategy + Guidelines:

- *The M1 motorway dominates the plateau's length and the industrial urban edge also strongly influences the character of the area.*

...

Visual Character

- *The motorways present a strong built element in the landscape. The M1 is generally poorly integrated with little in the way of screen planting and a locally dominant influence of vehicles and lighting gantries.*

3.20 For Site H4 there are effectively three new proposed Green Belt boundaries in the Plan, which are:

- Eastern boundary – M1 Motorway
- Southern eastern boundary – hedgerow and tree belt / proposed public open space retained in the Green Belt
- South Western boundary – The A4147 Hemel Hempstead Road

3.21 The proposed boundary alterations are considered to be sufficiently robust that they will not need to be altered at the end of the Plan period and use clearly defined boundaries using physical features that are readily recognisable and likely to be permanent.