

Matter 6 – Hemel Garden Communities ('HGC')

Issue 4 – Infrastructure Provision

12. 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.

Q1 Is there sufficient certainty regarding the total quantum, timing and cost of infrastructure necessary to facilitate the HGC in line with the Councils' expectations?

- 1.1 Yes, the Councils consider that there is sufficient certainty regarding the total quantum, timing and cost infrastructure necessary to facilitate HGC in line with the Councils' expectations, for the purpose of the Local Plan. The Councils consider that there is comprehensive and sufficient evidence to support the Plan, its Policies and its allocations. The key evidence documents which have informed this view and set out the total quantum, timing and cost of infrastructure include:

- INF 01.01 - SADC Infrastructure Delivery Plan (2024)
- INF 01.02 - Appendix A.1 SADC Infrastructure Schedule (2024)
- INF 10.01 - BNPPRE Local Plan Viability Report SADC (2024)
- INF 10.09 - North Hemel Hempstead Strategic Site Viability Report (2024)
- INF 10.03 - East Hemel (North) Strategic Site Viability Report (2024)
- INF 10.02 - East Hemel (Central) Site Viability Report (2024)
- INF 10.04 - East Hemel (South) Strategic Site Viability Report (2024)
- HGC 04.03 - Framework Plan Technical Evidence Report (2024)

- 1.2 Key elements of the SADC IDP include:

1.1 Purpose of the Infrastructure Delivery Plan

Ove Arup and Partners was commissioned by St Albans City and District Council (SADC) in December 2022 to prepare an Infrastructure Delivery Plan (IDP) in support of their new Local Plan. The purpose of the IDP is to set out the infrastructure that will be required to deliver the planned housing and employment growth across SADC. The IDP draws upon the existing evidence base produced by SADC, Hertfordshire County Council (HCC), and infrastructure providers.

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Part 3: Infrastructure Delivery Plan (this report): incorporates relevant feedback from the Regulation 18 Consultation and sets out the infrastructure requirements of the preferred growth scenario which will form the basis of the Regulation 19 Local Plan. This Part 3 IDP builds upon and incorporates the Part 1 and Part 2 IDPs, while providing further analysis associated with the preferred growth scenario.

Within the context of limited and diminishing funding, establishing a reliable and concise IDP will ensure any investment decisions are based on a sound understanding of infrastructure requirements and growth. This will offer greater certainty to service providers, funders and developers about how infrastructure will

be funded and delivered, enabling growth and encouraging investment. IDPs are, by their very nature, a 'snapshot in time', and as different infrastructure providers respond to their own unique challenges, the information that they provide will naturally date and alter over time.

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Table 1 Infrastructure Delivery Plan Scope by Topic

Infrastructure Topic	Sub Topic	Stakeholder(s)
Education	Early Years	Hertfordshire County Council
	Primary Education	
	Secondary Education	
	Special Educational Needs and Disability (SEND)	
	Further Education	Oaklands College
Health	Primary Healthcare	NHS Herts and West Essex Integrated Care Board, West Herts Hospital NHS Trust and Hertfordshire County Council
	Hospitals & Mental Health	
	Adult Social Care	
Community	Libraries	St Albans City and District Council and Hertfordshire County Council
	Youth Provision	
	Sports & Leisure	
	Culture	
	Community Halls	
Emergency	Police	Hertfordshire Police and Crime Commissioner

	Ambulance	East of England Ambulance Service NHS Trust (EEAST)
	Fire	Hertfordshire Fire and rescue
Green infrastructure / Open Space	Strategic Green Infrastructure	St Albans City and District Council, Hertfordshire County Council and Herts & Middlesex Wildlife Trust
	Local Green Infrastructure	
	Cemeteries	
Transport	Road	National Highways, National Rail, Hertfordshire County Council and St Albans City and District Council
	Public Transport	
	Active Transport	
Utilities	Water Supply	Thames Water
	Waste Water	Affinity Water
	Electricity	UKPN and National Grid
	Gas	Cadent Gas
Digital	Digital	Hertfordshire County Council, Open Reach, F&W Network, Hyperoptic
Flood	Flood Protection	Environment Agency and Hertfordshire County Council
Waste	Waste & Recycling	Hertfordshire County Council

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4.3.5 Approach to Delivery Period

Each intervention has a set out delivery period on when the intervention will likely be delivered. These periods were initially provided through up-to-date strategies and/or evidence base documents which were then verified by Stakeholders. In some instances, the period was set out by each of the providers during engagement. Where the delivery period for an intervention was not known by the provider but was directly associated with a Broad Location the delivery period of the site as listed in the housing trajectory was used and where the intervention was off-site and not linked to a Major Site the plan period was used.

4.3.6 Ongoing status of the Infrastructure Schedule

An IDP is intended to be a 'living document' that can be updated and reviewed at regular intervals. Where new or different information is received by the Council, or indeed the Council's own evidence base changes, it will be appropriate to review the IDP and amend the identified infrastructure requirements where necessary. This is particularly the case given the site-specific nature of demand forecasting in the IDP, which is based upon the sites proposed for inclusion in St Albans Local Plan at the time of writing.

It is also important to note some of the sites upon which the infrastructure schedule is based are not expected to be built out until towards the end of the plan period, and the context and circumstances of these sites may therefore have changed by the time a planning application is submitted to the Local Planning Authority. Subsequent

updates to the IDP are therefore likely to supersede the assumptions set out in this document over time. The timescales for updating the IDP will depend on the extent to which circumstances change.

- 1.3 There are a total of 15 headings entitled “Infrastructure to Support Growth Scenario” in the SADC IDP which give detail for the different infrastructure topics. Most of them set out:

The Infrastructure Delivery Plan has identified existing planned and/or proposed infrastructure, set out in greater detail in the Infrastructure Delivery Schedule (Appendix A).

- 1.4 It is considered important to note that ‘no showstoppers’ are identified in regard to any of the infrastructure topics.
- 1.5 The SADC Infrastructure Schedule (2024) (INF 01.02 - Appendix A.1) sets out some 195 Infrastructure Projects. This includes details regarding the total quantum, timing and cost of infrastructure necessary to facilitate HGC.
- 1.6 With regard to the viability of the total quantum, timing and cost of infrastructure necessary to facilitate the HGC in line with the Councils’ expectations, this is answered in more detail at M6I6Q6. In brief, for SADC the BNP Paribas viability work provides adequate viability testing associated with bringing forward the proposals at HGC. Key conclusions include:

INF 10.01 - BNPPRE Local Plan Viability Report SADC (2024) p4

■ *Cumulative impact of policies: In addition to the specific policies above, our appraisals have regard to the cumulative impact of other plan policies which may have cost implications. In this regard, our appraisals therefore comply with the requirement in national guidance for a comprehensive assessment of all relevant plan policies in the viability assessment.*

INF 10.09 - North Hemel Hempstead Strategic Site Viability Report (2024) p14
5 Conclusions and Recommendations

This testing demonstrates that the North Hemel Hempstead strategic site is viable and developable having regard to both the Council’s planning policy requirements including 40% affordable housing and additional planning policies as set out in our LPVS.

INF 10.03 - East Hemel (North) Strategic Site Viability Report (2024) p14
5 Conclusions and Recommendations

This testing demonstrates that the East Hemel Hempstead (North) strategic site is viable and developable having regard to both the Council’s planning policy requirements including 40% affordable housing and additional planning policies as set out in our LPVS.

INF 10.02 - East Hemel (Central) Site Viability Report (2024) p9
5 Conclusions and Recommendations

This testing demonstrates that the East of Hemel Hempstead strategic site is viable and developable having regard to both the Council's planning policy requirements.

INF 10.04 - East Hemel (South) Strategic Site Viability Report (2024) p14

5 Conclusions and Recommendations

This testing demonstrates that the East Hemel Hempstead (South) strategic site is viable and developable having regard to both the Council's planning policy requirements including 40% affordable housing and additional planning policies as set out in our LPVS.

- 1.7 Furthermore, for SADC, the Local Plan Part B site allocation set out the quantum of some infrastructure elements as Key Development Requirements.
- 1.8 The HGC Framework Plan work in 2023-2024 gave further evidence regarding the total quantum, timing and cost of infrastructure necessary to facilitate HGC, as set out in HGC 04.03 - Framework Plan Technical Evidence Report (2024). Key aspects include:

1.11 Planning for 'good growth' puts the exercise beyond the considerations of a normal urban extension, and requires fundamental thinking about the spatial, environmental, social and economic issues to ensure that the expanded town of Hemel Hempstead reads as 'one place'. The Framework Plan is a key component in this endeavour, embedding best practice in sustainable growth planning at the earliest stages of the planning process. It has been prepared on an ownership-blind basis to identify the optimum solution for the Growth Area. The Framework Plan exercise is being undertaken in order to:

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iii. Prepare an Infrastructure Framework which quantifies the Growth Area infrastructure requirements and uses this to inform a viability assessment in order to establish whether the emerging policy requirements are viable and deliverable.

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3.5 The framework planning exercise has informed the preparation of a site-specific infrastructure schedule (consistent with each Local Planning Authorities' Infrastructure Delivery Plan) to inform a coordinated approach to infrastructure delivery through individual planning applications, legal agreements and potentially, through cost sharing arrangements.

- 1.9 The Emerging Draft HGC IDP to 2050 (M6I4Q1 – Appendix 1A - Emerging Draft HGC IDP to 2050 Draft Report and M6I4Q1 – Appendix 1B - Emerging Draft HGC IDP to 2050 Draft Schedule) is an emerging draft of a document, that sets out the infrastructure required to support planned housing and employment growth across the Hemel Garden Communities (HGC) Programme Area, beyond the Plan period to 2050. It builds on the Dacorum and St Albans Local Plan IDPs (to 2041) and extends the timescale to 2050. While Local Plan IDPs typically align with plan periods (to 2041), the HGC IDP looks further ahead to 2050, to ensure long-term infrastructure planning and delivery for transformational growth.

- 1.10 The Emerging Draft HGC IDP to 2050 is primarily informing the approach to the forthcoming HGC planning applications and giving a strong evidence base for both LPAs and HCC and other service providers that infrastructure requirements for HGC beyond the plan period to 2050 are well understood.
- 1.11 The Emerging Draft HGC IDP to 2050 is not a Local Plan IDP, but is an additional piece of work undertaken to support the delivery of the HGC Programme, including the now well-advanced Planning Applications for H1 and H2-H4 (due to be submitted Autumn/Winter 2025). For the avoidance of doubt, it is considered that each respective Local Plan should be assessed with regard to their Local Plan IDP and associated viability, as submitted to the Inspectors. The Emerging Draft HGC IDP to 2050 is being introduced to the Inspectors to demonstrate the ongoing committed work of the HGC Partnership, and that considerations of cumulative infrastructure to 2050, including a draft infrastructure schedule to bring together the total quantum, timing and cost of the infrastructure requirements to 2050, is being undertaken by the HGC Partnership. It is, at this time, still an evolving 'work in progress' document.
- 1.12 There are important caveats to the Emerging Draft HGC IDP to 2050. As set out directly in the Emerging Draft HGC IDP to 2050 emerging schedule itself:

In reading the Draft HGC IDP to 2050 schedule, it is worth noting:

The HGC IDP is a living document and will be subject to ongoing updates and refinements. It reflects the best available information at the time of publication (September 2025) but is not static.

The projects identified are assessed as those being necessary and then categorised into Critical (Delivery and HGC Objectives), Essential or Important, based on the information provided at this moment in time, assuming sites within the plan are delivered in accordance with the projected housing trajectory at the point of June 2025. The housing trajectory will iterate over time, and may come forward differently as set out.

Project scopes, phasing, and cost estimates are indicative and will evolve over time. These may change as more detailed technical work, feasibility studies, and engagement with stakeholders and developers continues.

The HGC IDP to 2050 serves as a starting point for discussions with developers, infrastructure providers, and landowners. It is not a final or fixed list of requirements.

The infrastructure requirements outlined in the HGC IDP to 2050 will be further refined through the planning application process and legal agreements (e.g. Section 106). These processes will determine the final scope, timing, and funding responsibilities for infrastructure delivery.

The HGC IDP to 2050, should be read alongside each of the district's Local Plan's IDPs, particularly noting that there are schemes which apply district wide, which would apply in addition to the requirements set within the HGC IDP to 2050.

The HGC IDP to 2050 will be used to support bids for external funding, including government grants. Inclusion in the HGC IDP to 2050 helps demonstrate need and strategic alignment. Where a scheme has external funding listed within the schedule, this is subject to securing grant funding, and therefore may be subject to change depending on available funding opportunities.

Landowners and developers are encouraged to share additional information, evidence, and delivery proposals. This collaborative approach will help ensure the HGC IDP to 2050 remains accurate, deliverable, and aligned with site-specific opportunities.

The infrastructure asks and assumptions reflect the position at the time of publication (September 2025). They are subject to change as new information becomes available or as circumstances evolve.

Site-specific requirements, which are not reflected in the HGC IDP to 2050 or District IDPs, may still apply and will be considered as part of the planning application process.

The HGC local authorities accept no liability for errors in information and reserve the right to amend or update the requirements for infrastructure at any time based upon new evidence or understanding

The costs calculated for the purposes of the HGC IDP to 2050 schedule do not include off-site land purchase costs, or any costs in relation to compulsory purchase of land (CPO) to deliver infrastructure. This is because such costs are currently unknown

Funding gaps may continue to be identified for individual infrastructure items, based on further viability work

Securing external funding does not preclude reasonable and appropriate funding from development through developer contributions or other mechanisms

The HGC IDP schedule is accompanied by a report which will set out further detail

For Education requirements: Development sites across the HGC Programme Area have been modelled using HCC's Strategic Planning Ratios set out in HCC's Local & Strategic Plan engagement document to assess the appropriate level of education provision it needs to plan to be able to provide. Education infrastructure requirements will be kept under regular review by HCC. Education requirements will be further refined, subject to housing mix, tenure and demographic information, at the time of the Planning Application. The projects identified are assessed as those being necessary based on the information provided at this moment in time, assuming sites

within the plan are delivered in accordance with the projected housing trajectory. Whilst the phasing and/or combination of projects may evolve over time, development sites will only be responsible for mitigating their individual yields.

1.13 Further important caveats for the Emerging Draft HGC IDP to 2050 have been set out as:

- *The HGC IDP to 2050 is a living document and will be subject to ongoing updates and refinements. As an example of how Garden Community IDP's continue to iterate over time, Harlow Gilston Garden Town (HGGT) has continued to iterate the HGGT IDP since 2018, with versions in 2019, 2021, 2022 and 2024.*
- *Final infrastructure obligations will be determined through the planning application process and legal agreements (e.g. Section 106).*

1.14 Lastly, it is considered important to note that the well-advanced Planning Applications for H1 and H2-H4 (due to be submitted Autumn/Winter 2025) are being progressed on the basis of being policy-compliant and in-line with the SADC IDP. This gives further certainty regarding the total quantum, timing and cost of infrastructure necessary to facilitate the HGC in line with the Councils' expectations.

1.15 Overall, both Councils consider that there is sufficient evidence and certainty regarding the total quantum, timing and cost of infrastructure necessary to facilitate HGC in line with the Councils' expectations.

Q2 Is there appropriate evidence as to how different forms of infrastructure (including schools and open space) have been apportioned to different HGC allocations?

2.1 Yes, it is considered that there is appropriate evidence as to how different forms of infrastructure (including schools and open space) have been apportioned to different HGC allocations. This has primarily been set out through the SADC IDP (INF 01.01 INF 01.01 - SADC Infrastructure Delivery Plan (2024) and the SADC Infrastructure Schedule INF 01.02 - Appendix A.1 SADC Infrastructure Schedule (2024).

2.2 Infrastructure cost apportionment primarily applies to strategic infrastructure that serves multiple development sites. For example, the provision of a secondary school is intended to support a wider catchment area than a single site. SADC Infrastructure Schedule INF 01.02 identifies an 8FE secondary school at site H2, with a cost of £48M. The costs can be apportioned across three relevant sites in HGC, which are H1, H2 and H4. The strategic site viability reports (INF 10.03, INF 10.04 & INF 10.09) state that the 6-8 FE Secondary School (assumes c. £48.50m per secondary school equating to c. £8,883 per unit across the 3 x Hemel sites).

2.3 In contrast, infrastructure serving a single site at HGC, such as a primary schools, is typically not apportioned and is considered a site-specific cost. SADC Infrastructure Schedule INF 01.02 identifies primary schools as follows:

- Site H1 - 3FE primary school (estimated cost £17.7M);
- Site H2 – 3FE primary school (estimated cost £17.7M) and;
- Site H4 – 3FE primary school & 2FE primary school (estimated cost £29.5M)

- 2.4 The approach to open space provision applies a population-based metric (e.g. XX sqm of open space type per 1,000 population). These requirements are generally treated as site-specific and are not subject to apportionment.
- 2.5 SADC Infrastructure Schedule INF 01.02 provides the following information about open spaces for each site at HGC:

H1 North Hemel Hempstead

Associated local green infrastructure requirements to support development at North Hemel Hempstead in accordance with the HGC Framework Plan. Including 2.88ha of Parks and Gardens, 2.16ha of Amenity Green Space, 6.48ha of Natural and Semi-Natural Green Space and 0.90ha of Allotments. Estimated cost £1,471,279

H2 East Hemel Hempstead (North)

Associated local green infrastructure requirements to support development at East Hemel Hempstead (North) in accordance with the HGC Framework Plan. Including 3.07ha of Parks and Gardens, 2.30ha of Amenity Green Space, 6.91ha of Natural and Semi-Natural Green Space and 0.96ha of Allotments. Estimated cost £1,569,365

H4 East Hemel Hempstead (South)

Associated local green infrastructure requirements to support development at East Hemel Hempstead (South) in accordance with the HGC Framework Plan. Including 4.61ha of Parks and Gardens, 3.46ha of Amenity Green Space, 10.37ha of Natural and Semi-Natural Green Space and 1.44ha of Allotments. Estimated cost £2,354,047

- 2.6 The SADC Infrastructure Schedule INF 01.02 states that:

'Fields in Trust standards have been used. Costs have been assumed as those in BCIS and for amenity space it has been assumed as £160,000 per hectare.'

- 2.7 The SADC IDP (INF 01.01 - SADC Infrastructure Delivery Plan (2024)) sets out the approach to apportionment:

4.3.3 Approach to Apportionment

Once the interventions were listed and confirmed with Stakeholders, an apportionment exercise was undertaken for those strategic infrastructure interventions.

It was then necessary to identify which sites would contribute to the identified interventions/projects due to their proximity/impact/the extent to which they will benefit from or rely on these interventions to be acceptable in planning terms. There

were limitations to this exercise as there was little information on transport modelling and existing and likely future travel to school patterns at the time of initially undertaking this exercise. The approach was based upon the best available information at the time. At this stage, sites have been indicated where they will contribute to the overall delivery of a project. Once transport modelling has been undertaken, further work to apportion and share the costs between sites can be done.

Largely broad locations that are in close proximity to strategic pieces of infrastructure contribute to the overall delivery cost, this approach is not subject to whether they are located in the same parish or not. Where pieces of infrastructure are central to a parish and are strategic the approach that all other sites in the parish and broad locations in close proximity will contribute has been adopted.

At the next stage, the costs of apportionment and contributions will be proportional to the level of impact or generated demand resulting from the planned growth. Depending on the type of infrastructure it will be based on e.g. unit numbers, population/child yield or trip generation. This process will then begin to establish an understanding of the infrastructure funding gap for the area.

- 2.8 The apportionment approach is subsequently applied to the SADC Infrastructure Delivery Schedule (INF 01.02 - Appendix A.1 SADC Infrastructure Schedule (2024). The SADC Infrastructure Schedule (2024) (INF 01.02 - Appendix A.1) sets out some 195 Infrastructure Projects, including details regarding the apportionment of infrastructure for different HGC allocations. The report also notes:

Infrastructure Schedule: *The study is supported by a schedule of planned projects across SADC. This schedule records all identified project requirements, including the infrastructure type, location and timing where available is apportioned to contributing sites. Where information is not available or where stakeholders are unable to provide feedback, it is intended that further conversations with stakeholders are undertaken through the plan period and the schedule is updated accordingly.*

- 2.9 In conclusion, the Council sees that there is sufficient evidence to date, set out in INF 01.01 INF 01.01 - SADC Infrastructure Delivery Plan (2024) and the SADC Infrastructure Schedule INF 01.02 - Appendix A.1 SADC Infrastructure Schedule (2024).
- 2.10 NB: The Emerging Draft HGC IDP to 2050 (at M6I4Q1 – Appendix 1a and 1b) (see important caveats to this emerging work in answer to M6I4Q1 above) also addresses how different forms of infrastructure (including schools and open space) have been apportioned.

Q3 What is the justification for requiring accordance with the IDP, which is a non-statutory document intended to be updated regularly by each Council?

- 3.1 On reflection, the Council recognises that it would be more appropriate to use “should have regard to” and “having regard to” the IDPs, as reflected in the proposed Main Modifications below and as set out in SADC/ED85A and SADC/ED85C (NB: the version below also includes other proposed Main Modifications addressed elsewhere)

Policy LG2 – Support for Transformation of Hemel Hempstead

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All development in the HGC Programme Area must follow a planned and coordinated approach to growth and infrastructure and should have regard to ~~is expected to be in accordance with~~ Local Plan Infrastructure Delivery Plans (IDPs), 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 including the HGC Framework and Transformation SPD and the HGC Stewardship and Placemaking Strategy SPD.

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The methodology for infrastructure apportionment and cost sharing is set out in the Local Plan Infrastructure Delivery Plans (IDPs) and the HGC Framework and Transformation SPD. Infrastructure, contributions and wider funding will be required to deliver on and off-site infrastructure, having regard to, ~~in accordance with~~ the above documents.

- 3.2 While the Infrastructure Delivery Plan (IDP) is a non-statutory document, its role in the planning system is both strategic and essential and it is very important that its provisions fully influence the formulation of proposals as required in policy LG3, particularly with respect to its delivery requirements for the following reasons.
- 3.3 The IDP forms a key part of the evidence base underpinning the Local Plan. It identifies the infrastructure necessary to support planned growth, including transport, education, health, utilities, and green infrastructure. By setting out what is needed, when, and by whom, the IDPs ensures that development is not only planned but also deliverable. Development should have regard to the IDP to help ensure that infrastructure is provided in a timely and coordinated manner, which is important for the soundness of the Plan.
- 3.4 There is a requirement to have consistency with National Policy. The IDPs provide the mechanism through which such mitigation is identified and coordinated. Therefore, the IDPs align directly in accordance with national policy objectives. NPPF Paragraph 114 sets out:

Considering development proposals

In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;

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and d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

Transparency and Predictability for Developers and Infrastructure Providers

- 3.5 The IDP offers clarity to developers regarding infrastructure expectations and obligations. It also enables infrastructure providers to plan and invest with confidence, knowing that development will be phased and supported in line with agreed priorities. This transparency supports effective negotiation of planning obligations and helps avoid delays in delivery.

Flexibility and Responsiveness

- 3.6 Although non-statutory, the IDPs are designed to be a living document, updated regularly to reflect changes in funding, delivery programmes, and strategic priorities. This flexibility allows the Council to respond to evolving circumstances while maintaining a clear framework for infrastructure delivery.

Material Weight in Decision-Making

- 3.7 When referenced in Local Plan policies or Supplementary Planning Documents, the IDPs can carry material weight in planning decisions. It provides the basis for assessing developer contributions (e.g. via Section 106 or CIL in DBC) and for assessing the cumulative impact of development. As such, it plays a practical role in ensuring that infrastructure needs are met and that development is not permitted in the absence of necessary mitigation.
- 3.8 In summary, requiring proposals to be guided by the provisions of the IDP in the formulation of proposals is a justified and proportionate approach that supports the soundness, deliverability, and sustainability of the Local Plan. It ensures that infrastructure delivery is coordinated, transparent, and responsive, and that development proceeds in a way that is both sustainable and consistent with national planning policy.

Q4 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?

- 4.1 This question has been answered in relation to the Framework Plan first, as the Framework Plan feeds into the Transformation SPD, in sequential chronological order.

HGC Framework Plan

- 4.2 The HGC Framework Plan (2024) (HGC 04.01; HGC 04.02; HGC 04.03; HGC 04.04) was commissioned and prepared through a public and private sector joint-working arrangement between Hemel Garden Communities, Dacorum Borough Council, St Albans City & District Council, Hertfordshire County Council, The Crown Estate, Bloor, Pigeon Land and Kitewood. A governance structure was put in place to oversee the process. Regular Framework Plan Steering Group and Working group meetings were held to direct the preparation of the Framework Plan and ensured information and evidence were shared with, and drawn from, a wider group of local authority officers and other key stakeholders.
- 4.3 The Framework Plan covers the HGC Growth Areas, which include site allocations H1–H4 in the SADC Local Plan and Hm01 in the DBC Local Plan. It provides a spatial framework for development across these sites, which span two local planning authority boundaries and multiple land ownerships.
- 4.4 The purpose of the HGC Framework Plan being undertaken was in order to:
- **Prepare a single holistic spatial Framework plan** - Prepare a single, holistic spatial Framework Plan for the Growth Areas (For SADC site allocations H1-H4 and DBC Site Allocation Hm01), drawing on best practice in masterplanning and guided by garden community principles. The Growth Area straddles two LPA boundaries and multiple land holdings. The Framework Plan adopts a holistic view of the area and provides a single framework for growth. The work has been approached on an 'ownership blind' basis to achieve an optimum spatial / functional solution;
 - **Test site capacity and site requirements** - Test the capacity of the sites and any reasonable options to deliver up to 11,000 homes and around 10,000 jobs along with other relevant and/or emerging policy requirements including appropriate standards of open space, sustainable drainage, biodiversity net gain, Suitable Alternative Natural Greenspace (SANG), primary and secondary schools, and transport and highway infrastructure;
 - **Quantify and assess viability for infrastructure requirements across the HGC Growth Areas** - This framework exercise has facilitated the preparation of an infrastructure schedule aligned with the Infrastructure Delivery Plans (IDPs) of each Local Planning Authority. The Framework Plan Infrastructure schedule outlines the key infrastructure components required to support sustainable development, including transport networks, utilities, social infrastructure, and green spaces.
- 4.5 To summarise, the HGC Framework Plan exercise has produced a holistic spatial framework; and provides robust evidence supporting site allocations within the Local Plans and that the HGC growth areas are feasible and deliverable. The Framework Plan evidence demonstrates that the site allocations are developable, suitable and

policy complaint. (HGC 04.01; HGC 04.02; HGC 04.03; HGC 04.04). The Framework Plan outcomes have informed the BNP Paribas viability appraisals and the Local Plan IDP.

- 4.6 The Framework Plan plays a strategic role in guiding the development of the HGC Growth Areas (Sites H1, H2, H3, H4 and Hm01). It provides a single holistic spatial framework for the delivery of growth across multiple sites and authorities, enabling coordinated planning and infrastructure delivery.
- 4.7 It supports the implementation of garden community principles and best practice in masterplanning, and acts as a reference point for future planning applications, infrastructure planning, and design coding exercises. The Framework Plan also supports the Councils in demonstrating that the site allocations are suitable, developable, and deliverable.
- 4.8 The Framework Plan functions as a spatial and design reference for the preparation of masterplans for the HGC Growth Areas. It sets out the overarching land use structure, development principles, and infrastructure requirements that masterplans must align with.
- 4.9 As set out in Policy LG2 (SADC): “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 ... the supporting HGC Framework Plan evidence base including HGC Concept Plan, HGC Local Plan Policies, and supporting SPDs and Design Codes including the HGC Framework... (along with other SPDs / guidance)”. As set out in Policy LG3 (SADC) ‘Delivery’ section: “The approach will be in accordance with the HGC Framework Plan and... (other SPDs / guidance)”. As such, masterplan proposals for the allocated sites are required to be consistent with the Framework Plan. This ensures that development proposals are coordinated, policy-compliant, and contribute to the strategic objectives of the HGC Programme.
- 4.10 The Framework Plan directly supports the implementation of Local Plan policies, specifically the SADC Policies LG2 and LG3 and site allocations H1–H4. The policies require that masterplans for the allocated sites are prepared in accordance with the Framework Plan. The Framework Plan provides the spatial and infrastructure context necessary to interpret and apply these policies effectively, ensuring consistency across the HGC Programme Area.

The Framework Plan and Transformation SPD

- 4.11 The Hemel Garden Communities (HGC) Framework and Transformation Supplementary Planning Document (SPD) is being prepared jointly by Dacorum Borough Council (DBC) and St Albans City & District Council (SADC) to support the delivery of strategic growth within the HGC Programme Area. It provides detailed planning and design guidance to support the implementation of policies set out in the

respective Local Plans. The SPD applies to the strategic sites, growth areas, and opportunity areas identified within the HGC Programme Area.

- 4.12 The primary purpose of the HGC Framework and Transformation SPD (“F&T SPD”) is to provide supplementary guidance to ensure that development within the HGC Programme Area is delivered in accordance with the strategic objectives and policy requirements of the Local Plans. It aims to secure high-quality placemaking, sustainable infrastructure, and integrated neighbourhoods that align with national planning and design guidance, including the National Planning Policy Framework (NPPF), the National Design Guide, and the National Model Design Code.
- 4.13 The F&T SPD sets out strategic design principles and expectations for development, including standards for Green and Blue Infrastructure, Transport & Mobility, Placemaking, and Transformation of the existing town. It also provides clarity for developers and decision-makers on how to interpret and apply Local Plans policies in a consistent and coordinated manner.
- 4.14 Additionally, the Framework & Transformation SPD, derives from the evidence documents, as largely set out in section 4 of the Hemel Garden Communities Evidence Paper (Examination Library HGC 01.01), which includes:
- HGC Indicative Concept Plan (2024) (HGC 04.01)
 - HGC Framework Plan Story Document (HGC 04.02)
 - HGC Framework Plan Technical Evidence Report (2024) (HGC 04.03)
 - HGC Framework Plan Technical Evidence Appendices (2024) (HGC 04.04)
 - HGC Delivery Statement - update (Nov 2024) (HGC 02.01)
 - HGC 2050 Transport Vision & Strategy Executive Summary (2024) (HGC 05.01)
 - HGC 2050 Transport Vision & Strategy (2024) (HGC 05.02)
 - HGC Potential Modal Shift Executive Summary (2023) (HGC 05.04)
 - HGC Potential Modal Shift (2023) (HGC 05.03)
 - Heritage Impact Assessment Appendix 1 Hemel Garden Communities (2024) (EDH 04.02)
 - Hemel Hempstead Historic Study Report (2023) (HGC 06.02)
 - North Hemel Landscape Study Main Report (2024) (HGC 07.02)
 - Hemel Strategic Design Code Draft (2024) (HGC 06.01)
 - Green Infrastructure Strategy Final Draft (2024) (HGC 07.01)
 - Socio-economic and Demography Study (2024) (HGC 08.01)
 - Higher Education and Research Opportunities (2024) (HGC 08.02)
 - Heritage Impact Assessment Appendix 1 Hemel Garden Communities (2024) (EDH 04.02)
- 4.15 The F&T SPD DRAFT is being progressed and is working towards finalisation later in 2025, with the current schedule for public consultation in 2026 Q1, dependent on Local Plans Examination process, and potential SPD adoption in 2026 Q2 (subject to Local Plans adoption).

- 4.16 The F&T SPD plays a coordinating role in guiding the delivery of development across multiple sites within the HGC Programme Area. It draws upon the HGC Evidence Base, relevant local authority SPDs, and Hertfordshire County Council guidance to establish a consistent framework for growth.
- 4.17 It sets out overarching design principles and strategic objectives for the Programme Area, including the enhancement of green and blue infrastructure, promotion of active travel, improvement of air quality, and delivery of sustainable and affordable housing. The SPD supports the integration of new development with existing communities and infrastructure, contributing to the long-term transformation of Hemel Hempstead.
- 4.18 The F&T SPD will function as a material planning consideration in the determination of planning applications within the HGC Programme Area. It provides strategic design guidance suitable for informing outline planning applications and sets expectations for the preparation of detailed design codes at the reserved matters stage.
- 4.19 It serves as a reference document for landowners, developers, planning officers, elected members, statutory consultees, and local communities. It outlines requirements for masterplanning, contextual analysis, and placemaking, and includes checklists and criteria to support development management processes.
- 4.20 The SPD also supports the delivery of infrastructure priorities and site-specific design requirements, ensuring that development proposals contribute to the creation of inclusive, well-connected, and sustainable communities.
- 4.21 For the avoidance of doubt, the Local Plan policies are comprehensive and sufficient to set out policy requirements in order to achieve the HGC objectives. The SPD will supplement and provide further detail to the policies contained within the submitted Local Plans of DBC and SADC. It will support the implementation of SADC Local Plan Policies: LG2, LG3, HGC3, HGC4, HGC5, and site allocation policies H1–H4.
- 4.22 The F&T SPD aligns with national policy guidance and is consistent with the requirements of paragraph 134 of the NPPF, which supports the use of design guides and codes as part of plan-making or supplementary planning documents. It provides a spatial and design framework to ensure that Local Plan policies are applied coherently across the HGC Programme Area.
- 4.23 The main modification schedule as set out in SADC/ED85A and SADC/ED85C sets out the requirement for development to be in accordance with the F&T SPD.

Amend paragraph 3.51 as follows:

3.51 Community asset management may include green spaces, (including BNG),

heritage and cultural facilities, public realm, sports facilities, community buildings, commercial and residential development and other relevant facilities. A strong governance structure will guide long-term custodian community development, working with local partners to ensure programmes, events and services meet local needs. This approach will empower residents to help shape their communities alongside local authorities, landowners and key stakeholders, and is set out in the HGC Stewardship and Placemaking SPD. The Stewardship Umbrella Body would need to be set up before the first occupation of any dwellings across HGC Programme Area that would contribute towards the overall costs of its set-up and resourcing.

Amend Policy LG2 as follows:

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 Local Plan Infrastructure Delivery Plans (IDPs), 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 including the HGC Framework and Transformation SPD and the HGC Stewardship and Placemaking Strategy SPD.....

The methodology for infrastructure apportionment and cost sharing is set out in the Local Plan Infrastructure Delivery Plans (IDPs) and the HGC Framework and Transformation SPD. Infrastructure, contributions and wider funding will be required to deliver on and off-site infrastructure, in accordance with the above documents.

LG3 Amend clause c) of Pillar 1 - Green Network

c) Provide a variety of supporting green and blue infrastructure such as parks, open spaces, greenways, ecological corridors, sustainable drainage solutions, sports and leisure facilities, food growing and health and wellbeing projects as outlined in the HGC Green Infrastructure Strategy and HGC Health and Wellbeing Strategy Framework and Transformation SPD;

LG3 Amend clause a) of Pillar 2 - Integrated Neighbourhoods as follows:

a) ~~Well-integrated~~ Deliver well-integrated new neighbourhoods that respect and complement adjacent existing neighbourhoods and the wider existing neighbourhood structure of Hemel Hempstead. Proposals should be in accordance with the neighbourhood structure and guidance set out in the HGC Strategic Design Code ~~and, part of the~~ HGC Framework and Transformation SPD;

LG3 Amend clause b) of Pillar 4 - Engaged Communities as follows:

b) All proposals will deliver on the strategic principles and ambitions for stewardship and legacy placemaking across the HGC Growth Areas to maximise strong

governance and engagement of communities in accordance with the HGC Stewardship and Placemaking SPD;

LG3 Add new clause ba) to Pillar 4 - Engaged Communities after clause b) as follows:

ba) Proposals should support the single Umbrella Stewardship Body approach across the HGC Growth Area and deliver on strategic principles and ambitions for stewardship and legacy placemaking, in accordance with the HGC Stewardship and Placemaking SPD.

LG3 Amend introductory paragraphs to Delivery section as follows:

The approach will be in accordance with the HGC Framework Plan and Transformation SPD, HGC Stewardship and Placemaking Strategy, SPD, and future HGC guidance.

LG3 Amend clause f) of Delivery section as follows:

f) Compliance with the HGC Framework and Transformation SPD and the HGC Stewardship and Placemaking Strategy SPD

H1 North Hemel Hempstead Amend Key development requirement no. 15 as follows:

15. Neighbourhood Masterplanning will respect the landscape and neighbourhood setting including the adjacent Woodhall Farm neighbourhood, and new neighbourhood design coding, as set out in the Strategic Design Code, part of HGC Framework and Transformation SPD.

H2 East Hemel Hempstead North Amend Key development requirement no. 16 as follows:

16. Development and design that connects the site to the neighbourhoods to the north and south and Spencer's Park to the west. Neighbourhood Masterplanning will respect the landscape and neighbourhood setting including the adjacent Spencer's Park and adjacent existing development, and new neighbourhood design coding, as set out in the Strategic Design Code, part of HGC Framework and Transformation SPD.

H3 East Hemel Hempstead Central Amend Key development requirement no. 14 as follows:

14. Development will be designed in accordance with the Strategic Sites Employment Uses Design Toolkit and HGC Strategic Design Code, part of HGC Framework and Transformation SPD, and take appropriate account of the Maylands Masterplan Plus document.

H4 - East Hemel Hempstead (South) Amend Key development requirement no. 18 as follows:

18. Development and design that connects the site to the neighbourhoods to the north and west. Neighbourhood Masterplanning will respect the landscape and neighbourhood setting, including the adjacent Leverstock Green neighbourhood, and new neighbourhood design coding, as set out in the Strategic Design Code, part of HGC Framework and Transformation SPD.