

Matter 6 – Hemel Garden Communities ('HGC')

Issue 5 – Growth Area Principles

13. St Albans Local Plan Policy LG3 and Dacorum Local Plan Policy HGC2 set out various elements of the '4 pillars' upon which the HGC concept is built, comprising 32 criteria, along with provisions in respect of delivery.

Q1 Are those policies clearly written and unambiguous so it is evident how a decision-maker should react to development proposals? Are all elements directive in terms of decision-taking, clear and effective?

Are those policies clearly written and unambiguous so it is evident how a decision-maker should react to development proposals?

- 1.1 Yes, it is considered that the policies are clearly written and unambiguous for the purpose of decision-making. The Council is open to making the policies even clearer and more unambiguous.
- 1.2 The Local Plans set a joint approach to enable high quality development and transformation across the Growth Areas, linked strongly to the HGC Spatial Vision. These joint policies set an approach for the Growth Areas. St Albans Local Plan Policy LG3 (and equivalent DBC Local Plan Policy HGC2) outlines that to enable the transformation of Hemel Hempstead, the design and delivery of HGC Growth Areas within the Hemel Garden Communities Programme Area must to adhere to the '4 pillars' listed requirements.
- 1.3 As set out in the HGC Delivery Statement (SADC HGC 02.01 - Delivery Statement - update (Nov 2024):

The Local Plans Policies surrounding Hemel Garden Communities have been developed in collaboration with the HGC Programme team and the SADC and DBC Local Plans teams.

The HGC Local Plan policies have been developed to be mirrored within the SADC and DBC Local Plans. The policies have been developed within the context of the Hemel Garden Communities (HGC) Programme area with reference to the growth areas and sites, and the wider transformation of the existing Hemel Hempstead urban area.

The policies have been developed to support that transformation, setting out an overarching policy that relates to the HGC Spatial Vision and Charter. The policy then leads on to a series of place principles which sets out how this will be delivered. This is followed by a set of site specific policies, which sit within site allocations, in each respective plan.

Support for Transformation of Hemel Hempstead - LG2 (SADC) / HGC1 (DBC)
This policy sets out housing targets (relevant to each District), jobs target, and the

need for development to be planned in accordance with the HGC Spatial Vision and Charter using the four 'pillars' (Green network, Integrated neighbourhoods, Self-sustaining economy, and Engaged Communities). This policy includes a map that sets out the key projects for transformation of Hemel Hempstead.

Site Allocations: H1, H2, H3, H4 (SADC)

For the SADC Local Plan, these are located within Part B of the Local Plan. Policies are set out for each of the SADC following sites: North Hemel Hempstead (H1); East Hemel Hempstead (North) (H2); East Hemel Hempstead (Central) (H3); and East Hemel Hempstead (South) (H4).

Site Allocation: Hm01 (DBC)

For the DBC Local Plan, the single allocation North Hemel (Hm01) sets out requirements for the land North of Hemel Hempstead.

Are all elements directive in terms of decision-taking, clear and effective?

- 1.4 Yes, it is considered that the elements listed in Policies LG3 St Albans are clear and effective for decision-taking. The Council, as previously indicated, remains open to making Main Modifications to make the relevant planning policies more effective.

N.B. The Framework & Transformation SPD will set out further details and provide a checklist for decision takers. As set out in the HGC Delivery Statement (SADC HGC 02.01 - Delivery Statement - update (Nov 2024):

Hemel Garden Communities Supplementary Planning Documents (SPDs) - Emerging

The emerging policies within the SADC and DBC Local Plans identify two Supplementary Planning Documents (SPDs) focused on Hemel Garden Communities: HGC Framework & Transformation SPD, and HGC Stewardship & Placemaking SPD.

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These documents take their lead from the emerging Local Plans' policies, as well as from the extensive HGC Evidence Base documents presented in this Delivery Statement. The SPDs will provide detailed guidance on developer requirements, including setting design standards for new development (i.e. Must Haves from the Strategic Code).

- 1.5 The joint approach is not uncommon and follows similar examples elsewhere in the country. These include:
- Aylesbury Vale Local Plan 2013-2033¹ supports the delivery of at least 16,207 homes across Aylesbury town. It includes policy D1 which sets out a series of principles for development within Aylesbury Garden Town.
 - o The Aylesbury Garden Town Masterplan² was adopted in 2020

¹ Available to view online at

https://media.buckinghamshire.gov.uk/documents/Aylesbury_local_plan_L46JWaT.pdf

² Available to view online at https://media.buckinghamshire.gov.uk/documents/AGT_Masterplan.pdf

- o The Aylesbury Garden Town Supplementary Planning Document (SPD)³ was adopted in October 2023
- Vale of White Horse Local Plan 2031 Part 2 and South Oxfordshire Local Plan 2035⁴ included a joint policy and a shared set of principles⁵ to support approx. 10,000 new homes for Didcot Garden Town.
 - o The Didcot Garden Town Delivery Plan was adopted in October 2017⁶, including a masterplan (Chapter 9) and detail on funding and delivery (Chapters 10 and 11).

N.B. Proposed Main Modifications for the SADC Local Plan are set out SADC/ED85A for the Part A Main Modifications (September 2025); SADC/ED85B for the Part B Main Modifications (September 2025) and SADC/ED85C for Table of Main Modifications (September 2025)

Q2 Are Policies LG3 and HGC2 suitably flexible so as to apply only to relevant types of development?

- 2.1 Yes, LG3 (SADC) is considered to be suitably flexible and appropriately scoped to apply only to relevant types of development within the Hemel Garden Communities (HGC) programme area.
- 2.2 The policy sets out the overarching HGC development principles, grouped under the four strategic 'pillars' and site-specific requirements are addressed through individual site allocation policies.
- 2.3 Policy LG3 applies specifically to the HGC Growth Areas identified within the St Albans Local Plan, namely sites H1, H2, H3 and H4. These allocations are intended to come forward as part of strategic-scale planning applications, which will collectively deliver approximately 5,500 homes and 53 hectares of employment land. It is worth noting that all 4 site allocations for SADC have been coming forward on the basis of Planning Performance Agreements that are in accordance with LG3 (H2-H3 TCE and H1 Pigeon/Bloor since 2024). The LG3 policy is designed to guide development at this strategic scale and is supported by other policies in the Plan - including LG1, which sets out requirements based on the scale of site coming forward.
- 2.4 Further guidance on how it would apply in practice to relevant types of development will be provided through the emerging HGC Framework and Transformation

³ Available to view online at https://media.buckinghamshire.gov.uk/documents/Aylesbury_Garden_Town_1_SPD_UXJD7yM.pdf

⁴ Available to view online at <https://www.southoxon.gov.uk/wp-content/uploads/sites/2/2021/02/SODC-LP2035-Publication-Feb-2021.pdf>

⁵ Policy STRAT3 of the South Oxfordshire Local Plan 2035, and Core Policy 16b of the Vale of White Horse Local Plan 2031 Part 2

⁶ Available to view online at <https://www.southoxon.gov.uk/south-oxfordshire-district-council/business-and-economy/garden-communities/didcot-garden-town/didcot-garden-town-delivery-plan/>

Supplementary Planning Document. As set out in the Council's response to Matter 4, Issue 5, Question 1 above, it is important that the necessary policy hooks are in place through an up to date, adopted Local Plan in order for the SPD to be progressed.

2.5 Overall, policy LG3 is framed to apply only to development proposals that are part of the strategic HGC programme area. The Council sees that the policy is:

- **Targeted** to relevant sites and scales of development;
- **Flexible** enough to accommodate evolving masterplans and delivery approaches;
- **Effective** in guiding the comprehensive and coordinated delivery of HGC.

Q3 What is the justification for requiring compliance with 'future HGC guidance' in Policy LG3/HGC2? Is this clear, justified and effective?

What is the justification for requiring compliance with "future HGC guidance" in Policy LG3/HGC2?

- 3.1 The Hemel Garden Communities (HGC) programme is a long-term, strategic project that will continue to evolve over time, all the way until completion estimated in 2050. As such, it is essential that planning policy remains responsive to emerging best practice, technical evidence, and delivery mechanisms. The reference to "future HGC guidance" was originally intended to ensure alignment with the evolving programme and provide a common framework for decision-making across the HGC area.
- 3.2 As set out in the Council's response to Issue 5, Question 1 above, the use of SPDs as "hooks" for future decision-making is a well-established planning practice. It allows for flexibility in implementation while maintaining transparency and accountability through formal adoption processes. This approach is consistent with many broadly similar Local Plans, including the Dacorum Borough Council Core Strategy and the Inspector's Report (2013), which supported the use of SPDs to guide implementation of strategic policies.
- 3.3 However, in order to make the policy more clear, justified and effective, proposed Main Modifications (as set out in SADC/ED85A and SADC/ED85C) have been made to Policy LG3. These modifications (see M6I4Q4) remove the reference to "future HGC guidance" and instead specify compliance with specific emerging documents, namely:
- The emerging HGC Framework and Transformation Supplementary Planning Document (SPD)
 - The emerging HGC Stewardship and Placemaking SPD
 - The emerging draft Hemel Garden Communities Infrastructure Delivery Plan (IDP) to 2050, eventually to sit alongside the district Local Plan IDPs

- 3.4 Both St Albans City & District Council and Dacorum Borough Council have committed to early Local Plan Reviews, which provide a formal mechanism to incorporate any future guidance or updates into the statutory planning framework.
- 3.5 As set out in the Council's response to Issue 5, Question 1 above, The Framework & Transformation SPD will set out further details and provide a checklist for decision takers.

Is this clear, justified and effective?

- 3.6 To improve clarity and effectiveness, the proposed Main Modifications (as set out in SADC/ED85A and SADC/ED85C) remove references to “future HGC guidance” and instead anchor the policies in specific emerging documents. This ensures that the policies are:
- Clear in their expectations;
 - Justified through alignment with the HGC programme and strategic commitments;
 - Effective in supporting delivery while allowing for future updates through formal Plan Review and SPD adoption processes.