

Matter 6 – Hemel Garden Communities ('HGC')

Issue 6 – Viability and Deliverability

Q1 Which of the sources of housing and employment land will contribute, and to what extent, towards anticipated delivery at the HGC during the plan period and beyond?

- 1.1 The SADC housing trajectory is set out at Housing Topic Addendum (HOU 01.01). As part of the annual monitoring to Homes England, in association with the National Garden Communities programme, the Hemel Garden Communities Housing Trajectory has been prepared to include all the site allocations within the HGC Programme Area. This is comprised of the SADC site allocations (H1-H4). This version of the housing trajectory was submitted to Homes England in June 2025 as part of annual monitoring. The combined HGC Trajectory extends beyond the plan period and covers up to 2050.
- 1.2 The updated trajectory for the sites within Hemel Garden Communities Programme Area is appended in the following documents:
 - M6I6Q1 - Appendix 1A - HGC Housing Delivery Trajectory_DBC SADC Combined ;
 - M6I6Q1 - Appendix 1B - HGC Housing Delivery Trajectory_SADC Only ;
- 1.3 For the avoidance of doubt, the SADC housing trajectory (M6I6Q4 - Appendix 2A - SADC HGC Trajectory - H1 ; M6I6Q4 - Appendix 2B - SADC HGC Trajectory - H2 ; M6I6Q4 - Appendix 2C - SADC HGC Trajectory - H4) has no changes to the Hemel Garden Communities site allocations H1-H4, since the point of Submission in November 2024.
- 1.4 All the employment land at East Hemel Central (H3) identified in the SADC Local Plan is likely to be delivered within the Plan period, supporting the economic objectives of the HGC programme. This is supported by the ongoing PPA process with The Crown Estate and the Council, which is indicating that all the employment land is likely to be delivered in the Plan period. There is a very strong market for the 36 Hectares to the north of the site, which will promote uses such as logistics and mixed industrial areas, covering the large majority of the H3 allocation and there is a high likelihood of this area coming forward early within the Plan period. There is also good evidence of good demand for the range of uses proposed in the Business, Research and Development Park in the southern approximately 17 Hectares of the site. Key relevant quotes from EMP 01.01 - South West Herts Economic Study (2024) include:

7.19 East Hemel Hempstead Central is a very large site in the west of the local authority area, adjacent to Maylands Business Park (Hemel Hempstead, Dacorum). The site is located in the Herts IQ Enterprise Zone and forms part of the Hemel Garden Communities (HGC) programme aiming to create new sustainable communities in and around Hemel Hempstead. It is a relatively flat site, close to the M1 junction and is therefore attractive for a mix of uses, but particularly strategic

distribution. A range of stakeholders, including SADC, Hertfordshire LEP and HGC have expressed a desire to avoid overconcentration of strategic distribution uses, and have identified potential for office, R&D and light industrial development with the intention of attracting Herts IQ's target occupiers. These include a number of high value sectors such as sustainable construction, agri-tech and environmental technology.

...

5.88 Consultees reported that the most urgent property need for the agri-tech sector is grow-on space for those businesses that are too large for the campus accommodation, which applies to a number of their tenants. They noted a number of their tenants had been unable to find suitable premises in the local area which had resulted in them leaving South West Herts.

5.89 These tenants were reported to require a mix of laboratory, office and small-scale production space. There is limited scope for further development at the Rothamsted campus itself, meaning this grow-on space would ideally be located close by in order to retain these businesses in the area and build on the existing cluster in St Albans. They specifically identified an opportunity to meet this need at the East Hemel Hempstead Central site, part of the Herts IQ Enterprise Zone, which they believed could act as a satellite to the Rothamsted campus or a small science park in its own right.

- 1.5 Overall, the sources of housing and employment land which will contribute towards anticipated delivery at the HGC during the plan period and beyond are set out in the Local Plan and the accompanying housing trajectory.

To facilitate discussions around viability and deliverability, it would assist the examination if the Council could produce an updated trajectory for each individual site allocated at the HGC.

The updated trajectory for the sites within Hemel Garden Communities is appended, see:

- M6I6Q1 - Appendix 2A - SADC HGC Trajectory - H1
- M6I6Q1- Appendix 2B - SADC HGC Trajectory - H2
- M6I6Q1 - Appendix 2C - SADC HGC Trajectory - H4

Q2 The Delivery Statement supporting the St Albans Local Plan is dated November 2024 (Core Document HGC 02.01), whereas that supporting the Dacorum Local Plan is dated March 2025 (HGC01.02). What are the differences between the two documents (if any) and which is correct?

- 2.1 The DBC HGC Delivery Statement March 2025 (HGC 01.02) is an updated version of the SADC November 2024 (Core Document HGC 02.01). For the purpose of the joint hearing session on Hemel Garden Communities, and for the latest position with the HGC Programme, the DBC HGC Delivery Statement March 2025 (HGC 01.02) should be referred to.

- 2.2 For the avoidance of doubt, there are no substantive updates to the SADC sites/elements.
- 2.3 The minor changes reflect the work undertaken between November 2024 and March 2025, and mostly relate to update with HGC programme workstreams, and progress with the DBC Local Plan. The changes are listed below:

Document area	Page Number*	Description of Change	Reason for Change
Figure 2 Hemel Garden Communities Programme Area	7	Proposed allocations Hm11 and Hm13 were added to Figure 2 and Figure 16.	This change was made to align these figures with Chapter 2 of the Dacorum Local Plan to 2041 (CD01.1).
Figure 16 Location of permitted schemes (including the accompanying text).	16	The accompanying text to Figure 16 was updated to describe the two recommended site allocations.	
National Policy Context	33	Text within this section was updated.	The text was updated to reflect changes within the updated NPPF (December 2024) relating specifically to the importance of garden communities to promote sustainable development, meet local needs, and address housing shortages.
Figure 17 Developing a new Local Plan	40	The figure was updated to highlight the "Submission" stage in green.	This change was made to reflect the current stage of plan making.
Developing the HGC policies	41	New paragraph added referring to the relevant HGC SPD documents.	This change was made to align these figures with Chapter 2 of the Dacorum Local Plan to 2041 (CD01.1), which refers to the proposed SPDs within draft policy. The new text provides a proposed timeline on the production and adoption of the supplementary guidance. The new text confirms that the guidance will follow on from the emerging Local Plan policies and are informed by the evidence base.
Figure 20 Land Ownership	50	This figure was added to the updated framework plan,	The updated text provides further clarity on the land ownership structure of the HGC Growth Areas, and clarifies that

		including new supporting text.	the Framework Plan, Concept Plan, and other key workstreams have adopted an “ownership blind” approach to assessing the site’s capacity and the distribution of land uses. The text also sets out how further work undertaken by HGC (including the development of a site assembly strategy and the establishment of a Landowners Forum) will enable collaboration and coordination among landowners and developers.
Figure 21 The Indicative Concept Plan	52	A note was added adjacent to this figure to set out the provision of secondary education on the Hm01 allocation.	This set out the most up-to-date position on the requirement for new secondary school provision on the site, provided by Hertfordshire County Council as the Education Authority.
HGC Strategic Design Code	54	New text titled ‘next steps’ was added.	This text clarified the planning status and production timeline of this guidance.
HGC Framework & Transformation SPD Status	56	A new page setting out the status of the HGC Framework & Transformation SPD was added.	This page outlines the Purpose and Scope of the SPD and sets out the proposed next steps.
HGC Stewardship Strategy	73	This page was replaced with a new ‘HGC Stewardship and Placemaking SPD Status’ page.	This page outlines the Purpose and Scope of the SPD and sets out the proposed next steps.
HGC Delivery Strategy & Infrastructure Delivery Plans	75	These pages were updated.	The updated text outlines the further progress on the Emerging Draft Hemel Garden Communities Infrastructure Delivery Plan to 2050 and the proposed next steps.
Appendix 3: Schedule of Engagement	89	Updated to reflect eight events which were held since November 2024.	

*N.B. The ‘Page Number’ relates to the DBC HGC Delivery Statement March 2025 (HGC 01.02)

- 2.4 The HGC Delivery Statement will continue to iterate through the lifetime of the Hemel Garden Communities project. The latest version of the Delivery Statement will be kept updated on the Hemel Garden Communities website.

Q3 Table 3.2 of the St Albans Local Plan envisages 100 houses completed at HGC in 2029/30, with development increasing thereafter up to 500 units per year. What are the lead-in times and build-out rates based on, and are they reasonable and realistic assumptions around deliverability?

- 3.1 The SADC housing trajectory for HGC sites (Site Allocations H1, H2 and H4) has been developed through an approach to build out rates based on the methodology set out in the Lichfields' 'Start to Finish' report (Second Edition, 2020 and Third Edition, March 2024). The SADC approach for the HGC sites been adjusted in relation to the Lichfields' methodology because of the unique scale and nature of the HGC programme (11,000 homes). The detailed housing trajectory for each SADC HGC site, was set out in the Housing Topic Addendum (HOU 01.01) and is set out in more detail to answer Matter 6, Issue 6 above and in Appendices M6I6Q1- Appendix 1A; M6I6Q1- Appendix 1B; M6I6Q1- Appendix 1C; M6I6Q1 - Appendix 2A; M6I6Q1- Appendix 2B and Appendix 2C.
- 3.2 The justification for the approach taken to the HGC housing trajectory is based on:
- Provision of the widest range of different housing types, tenures and diversity in housing stock, contributing to higher build out and absorption rates;
 - High market absorption rates due to SADC's desirability;
 - Affordable housing and supported living contributing to higher build out and absorption rates;
 - Strategic scale of site, enabling delivery of infrastructure;
 - Strategic scale of site, allowing for multiple outlets for housing delivery;
 - Analysis of strategic scale development;
 - Capacities having been tested through the HGC Framework Plan;
 - That all HGC site allocations (H1-H4) are in Planning Performance Agreements (PPAs); and
 - Support and input from Landowners including The Crown Estate, Pigeon and Bloor, commercial agents including Savills, Homes England and others.
- 3.3 The findings from the Lichfields' report is focused mostly on sites of up to 2,000 dwellings and has limited examples beyond 5,000 homes in size. Therefore, SADC consider it is appropriate to use its own methodology which takes into account other strategic scale developments (2,000 + dwellings). The HGC trajectory has been informed by the Council's own analysis of strategic scale development from other

Councils, including Milton Keynes, Ebbsfleet Garden City, Northstowe in Cambridgeshire and Cranbrook, East Devon. It has also been informed by discussion with Homes England, Dacorum Borough Council, Hertfordshire County Council, Hertfordshire Futures (Former Herts LEP), Hyas Associates, the Crown Estate, Savills, David Lock Associates and others.

- 3.4 The Landowners - The Crown Estate, Pigeon and Bloor (H1 – H4 allocations) - have shown support for the housing trajectory in the Regulation 19 responses (Ref No. 272, 286, 289 and 337) and in their Statements of Common Ground with the Council (see examination documents SADC/ED12, SADC/ED13 and SADC/ED22).
- 3.5 The overall HGC Trajectory, comprising of both SADC and DBC site allocations, is annually reported to Homes England, since 2021 and they continue to support the delivery rates set out in the Plan. The last update provided was in June 2025.
- 3.6 The District is a highly attractive housing market with high demand for new homes. It should be noted that the Lichfields' 'Start to Finish' report states that areas such as St Albans with a higher demand for housing (as measured by higher affordability ratios, of house prices to earnings) had higher average annual build out rates than lower demand areas. National data (2023) shows that out of 318 Local Authority areas in England St Albans has the fifth highest affordability ratio. Lichfields' 'Start to Finish' report also states that schemes with higher proportions of affordable housing had faster average annual build-out rates (which applies in St Albans District), and that schemes with additional outlets had a positive impact on build-out rates (which often applies in St Albans District, particularly for Broad Location scale development).
- 3.7 There are other factors influencing higher build out rates on strategic scale sites, such as Infrastructure Delivery, diversified housing types including provision of affordable housing, supported living schemes and Build to Rent.
- 3.8 The strategically planned nature and scale of HGC, enables developers to capitalise on economies of scale, improving cost efficiency, while also providing critical infrastructure and community facilities. The very large scale of HGC offers the potential to provide a broad mix of housing tenures, including owner-occupied, affordable rent, shared ownership, and private rented schemes and Built-to-Rent.
- 3.9 By catering to a diverse range of housing types and demographics - such as first-time buyers, families, and older residents - the development can meet the complete range of different housing needs simultaneously. The inclusion of various tenure types diversifies the housing stock and ensures that homes are accessible to a wider range of people, supporting faster absorption and sales rates.
- 3.10 Each of the four site allocations (H1, H2, H3 and H4) within the SADC District are advanced through the Pre-Application stage, with initial Planning Performance

Agreements (PPAs) discussion commencing from Winter 2023. Outline applications are due to be submitted in Winter 2025. The PPAs are all progressing on the basis of the delivery rates set out in the Plan.

- 3.11 The Crown Estate (TCE) entered initial discussions regarding a Planning Performance Agreement (PPA) in Winter 2023 for land East of Hemel Hempstead (Site Allocations H2, H3 and H4). A PPA agreement between TCE, SADC, DBC, HCC and HGC was signed in July 2024. The Crown Estate plan to submit an outline planning application for submission in Winter 2025. The EIA Scoping Opinion application 5/2024/2171¹ sets out that the proposed development would constitute:

Construction of up to 4,000 new dwellings (to include 40% affordable housing, 5 extra-care facilities each comprising 70-80 self-contained units, 3 nursing homes (each of 70-80 beds) and 16 supporting living units); up to 53ha of employment and ancillary facilities (to include 17ha of Business (Ei), Research and Development (Eii) and 36ha of Logistics (B8) and mixed industrial uses (B2 and Eiii)); green infrastructure and landscaping works (to include a country park, formal and informal open space, amenity space, managed woodland, ecological network links and sports facilities); early years, primary and secondary education facilities; neighbourhood centres and local centres (to include retail, community and employment uses; sports hub; medical centre); mobility hubs; sustainable drainage systems (including ponds, lakes and water courses); supporting infrastructure (comprising utilities and diversions as necessary); vehicular and active travel access points, estate roads and connections to the surrounding highway, cycleway and pedestrian network; buffer zones to the M1 and Buncefield oil depot and pipelines; improvements to existing public rights of way, improvements to the Nickey Line and delivery of a proportion of the Hemel Garden Communities (HGC) Green Loop; land for up to 40 Gypsy and Traveller pitches; provision of an active travel bridge over the A414; safeguarded land for M1 Junction 8 improvements; ground remodelling and any necessary demolition.

The application would cover all of the site allocations H2, H3 and H4.

- 3.12 Significant progress has been made to date through the PPA process for Land East of Hemel Hempstead. The EIA Scoping Opinion application (Application 5/2024/2171) was submitted in December 2024 and a formal scoping opinion was issued on 21st January 2025. A Design Review Panel held by Design South East, took place on December 2024, and a follow up was held in March 2025. To date, the Crown Estate have undertaken a range of engagement and consultation events including public engagement in October and November 2024; engagement with Members in November and December 2024; a residents' site visit to Cambridge in December 2024; and a series of community engagement workshops in January 2025, February and March 2025 as well as in the summer of 2025. Further

¹ Application 5/2024/2171 documents available via: <https://planningapplications.stalbans.gov.uk/planning>

engagement is planned over the coming months.

- 3.13 Pigeon and Bloor Homes entered initial discussions with SADC regarding a Planning Performance Agreement (PPA) in Summer 2023 for Land North of Hemel Hempstead (Site Allocation H1). The PPA process and meetings commenced in October 2024, with the first masterplanning PPA meeting held on 13th February 2025. The North Hemel Hempstead PPA between SADC, HCC, HGC, Pigeon and Bloor was agreed for signing in February 2025. Pigeon and Bloor plan to submit an outline planning application for submission in Winter 2025. The EIA Scoping Opinion application 5/2025/0645² sets out that the proposed development would constitute:

Outline application for residential-led mixed use development comprising up to 1,500 new dwellings (including residential accommodation and specialist accommodation for older people) (Use Class C3 and C2), a 3FE primary school (including early years provision) (Use Class F1), a local centre (Use Class E, F1 and F2), mobility hub, open space, amenity space, allotments, green infrastructure, sustainable drainage systems, vehicular and active travel routes, and supporting infrastructure and works. All matters reserved except for access junctions to the B487 and Holtsmere End Lane

- 3.14 Significant progress has been made to date through the PPA process for Land North of Hemel Hempstead (H1). The EIA Scoping Opinion application (5/2025/0645) was submitted in March 2025 and a formal scoping opinion was issued on 23rd May 2025. A Design Review Panel held by Design South East, took place in May 2025 and a further DRP took place on the 24th September 2025.
- 3.15 The lead-in times are based on the following indicative timings for H2 and H4:

Stage	Indicative Date
Outline Planning Application Submission	Q4 2025
Determination	Q2 2026
Reserved Matters Submitted	Q2 2027
Reserved Matters Determined	Q3 2027
Discharge of pre-commencement conditions	Q4 2027
Commencement on site	Q1 2028
First Completions	Q3 2029

- 3.16 The initial 100 houses in 2029/30 are based on 50 homes being delivered at East Hemel North (H2) and 50 homes at East Hemel South (H4). The peak of 500 units per year, in year 12 of the plan, in 2038/39, comprises of multiple developers and outlets. At this peak, H1 would deliver 125 homes (Developers: Pigeon and Bloor); H2 115 homes and H4 100 homes from one outlet and 160 homes from another outlet. The Crown Estate has indicated they would assume a role as master

² Application 5/2025/0645 documents available via: <https://planningapplications.stalbans.gov.uk/planning>

developer, and therefore sites H2 and H4 would have different developers operating on the site. Therefore, the build-out rates are reasonable due to the opportunity for multiple outlets and developer delivery.

- 3.17 To conclude, the justification for the HGC housing trajectory is based on the sites' strategic scale, diverse housing provision, strongly evidenced high market absorption rates, tested capacities, and strong stakeholder support, ensuring efficient delivery and infrastructure development. As a result, the Council is satisfied that the delivery of housing at the HGC sites is based on reasonable and realistic assumptions around deliverability developable and can deliver the scale and quantum of housing envisaged by the Plan.

Q4 How do the lead-in times and build-out rates take into account the need for necessary strategic infrastructure requirements, especially strategic highway improvements?

- 4.1 The need to factor in realistic lead-in times to inform reasonable build out rates, taking into account the need for necessary strategic infrastructure requirements, especially strategic highway improvements, has underpinned the development and iteration of the HGC housing trajectory
- 4.2 Lead-in times and build-out rates, have also been informed by the Infrastructure Delivery Plan (For SADC INF 01.01 - SADC Infrastructure Delivery Plan (2024) and INF 01.02 - Appendix A.1 SADC Infrastructure Schedule (2024)).
- 4.3 The two most important strategic infrastructure categories for HGC that impact lead-in times and build out rates, especially in the early years of the Plan, are transport and education. The key early year delivery of infrastructure can be simply illustrated in the indicative timelines/phasing as set out below (based on the phasing periods within the Local Plan IDP and then iterated to take account of the best and most recent data and focussed on the early years:

Table 1: Early Year Delivery of Infrastructure at HGC

Estimated Completions	Infrastructure Requirement
1000 homes by 2033 H1- 237 H2 - 377 H4 - 387	Transport - Highways access to support access to development at sites H1, H2, H3 and H4 (<i>Phasing Period 2025-2041</i>); - M1 Junction 8 enhancement – Project Breakspear Phase 1 Phoenix Gateway Roundabout (A414/Green Lane) re-configuration and signalisation (<i>2026-2031</i>);

	• M1 Junction 8 enhancement – Project Breakspear Phase 2 - Prioritisation of active and sustainable modes of travel (2028-2033); • Delivery of Integrated Mobility Hub at East Hemel Hempstead (Central) (<i>Phasing Period 2028-2033</i>); Education and other Infrastructure • 2FE primary school provision
2000 homes by 2036 H1 - 514 H2 - 699 H4 - 789	Education and other Infrastructure • 2FE primary school provision Transport • East Hemel Hempstead (North) (H2) Local Mobility Hub (<i>Phasing Period - 2031-2036</i>) ; • Quietways including Cherry Tree Lane ; Punchbowl Lane ; Hogg End Lane and Blackwater Lane (<i>Phasing Period 2031-2036</i>) • A4147 Hemel Hempstead Road Gateway Corridor (<i>Phasing period 2031-2036</i>)
3000 homes by 2038 H1 - 762 H2 - 952 H4 - 1287	Education and other Infrastructure • Delivery of Secondary school at East Hemel North (H2) • 2FE primary school provision Transport • Delivery of Integrated Mobility Hub at H1 North Hemel Hempstead (<i>Phasing Period 2025-2041</i>);
4000 homes by 2040 H1 - 1097 H2 - 1142 H4 - 1762	Education and other Infrastructure • Delivery of on-site healthcare provision - Medical Centre (<i>Phasing Period – 2029 – 2041</i>)
4300 homes by 2041 H1 – 1125 H2 – 1235 H4 – 1940	Education and other infrastructure • 1x primary school (<i>Phasing Period - 2030-2050</i>);

4.4 These phasing timelines, demonstrate that infrastructure delivery is being planned in parallel with housing delivery. Furthermore, there are no ‘showstoppers’ in terms of transport or education provision (or any other type of infrastructure provision).

- 4.5 This is further supported by ongoing work through Planning Performance Agreements (PPAs), which are progressing work to secure infrastructure commitments.
- 4.6 Since 2019, the HGC Transport Sub-Group, which is attended by SADC, DBC, HCC, National Highways and developers, has played a central role in coordinating transport planning across the programme area. The HGC Transport Sub-Group will play a role in ensuring there is coordination and consideration of lead-in times, in particular consideration of delivery of strategic highways works. Furthermore, the group will play a role in developing the approach and enacting the 'Monitor and Manage' of transport infrastructure. Monitor and Manage is introduced in the new policy TRA0, as a main modification. Proposed Main Modifications for the SADC Local Plan are set out SADC/ED85A for the Part A Main Modifications (September 2025); and SADC/ED85C for Table of Main Modifications (September 2025).
- 4.7 Alongside this, the HGC Developer Forum has been active since 2024, facilitating collaboration between landowners, promoters, and local authorities to ensure that infrastructure and development will progress in a timely and coordinated manner.
- 4.8 The SADC IDP (and the Emerging Draft HGC IDP to 2050) have been developed in close consultation with infrastructure providers and are treated as live documents. This allows for flexibility and responsiveness to changing circumstances, ensuring that infrastructure delivery remains proportionate and up-to-date at the point of decision-making.
- 4.9 The SADC Infrastructure Delivery Schedule sets out phasing periods that are aligned with the housing trajectory, providing clarity on when infrastructure is expected to come forward.
- 4.10 Through the Framework Plan exercise (Documents HGC 04.01 – HGC 04.06), the HGC Framework Plan has considered infrastructure delivery alongside the land use planning process, ensuring that strategic infrastructure corridors, access points, and safeguarded land are integrated into the concept plan (HGC 04.01).
- 4.11 For the avoidance of doubt, the infrastructure planning process has considered the full plan period to 2041 and beyond to 2050, with particular emphasis on early delivery of key infrastructure such as transport requirements and education facilities. Flexibility has also been built into the provision strategy to allow for adjustments in response to delivery challenges or opportunities.
- 4.12 The IDPs are designed to accommodate such changes, ensuring that infrastructure delivery can adapt to evolving development trajectories.
- 4.13 Overall, the lead-in times and build-out rates for HGC have been carefully considered to align with the delivery of strategic infrastructure, particularly transport and education. The approach is:

- Realistic - based on infrastructure dependencies and phasing;
- Coordinated - through IDPs and emerging work through the PPAs on sites H1-H4;
- Flexible - allowing for updates and acceleration where appropriate;
- Effective - ensuring infrastructure is in place to support sustainable growth.

Q5 What are the implications for both Plans if HGC does not deliver at the rates expected? Should the Plans be modified include additional flexibility, or a fallback position if the HGC proposals are delayed?

What are the implications for both Plans if HGC does not deliver at the rates expected?

- 5.1 Firstly, it is considered important to point to the fact that there is strong evidence to support the view that the development will come forward as envisaged. Each of the four site allocations (H1, H2, H3 and H4) within the SADC District are at Pre-Application stage, have made significant progress through structured Planning Performance Agreements (PPAs) and have outline applications anticipated to be submitted in Autumn/Winter 2025. Furthermore, the HGC landowners have each expressed support in Statements of Common Ground for the housing trajectory and the Key Development Requirements for the Hemel Garden Communities sites (see examination documents SADC/ED12, SADC/ED13 and SADC/ED22).
- 5.2 There is an extensive and comprehensive system of governance to support the Hemel Garden Communities (HGC) programme. The HGC programme and its associated wider governance also offers a mechanism to review progress of the delivery of HGC. The HGC Delivery Board is the most senior level of governance and includes membership from Lead Councillors and Chief Officers from the Authorities, as well as Homes England, Hertfordshire Future and Herts Innovation Quarter. The HGC Delivery Board then feeds back into the respective authorities' governance systems (see SADC examination document SADC/ED67).
- 5.3 The Hemel Garden Communities programme regularly meets with, and is in discussions with, MHCLG and Homes England, regarding the acceleration of housing delivery and early infrastructure delivery across the HGC Programme Area (SADC HGC Growth Areas and Hemel Hempstead in DBC) and HGC's role in contributing to the delivery of the Government's growth agenda.
- 5.4 Given the NPPF 2024 approach, the Councils have committed to an immediate review of their respective Local Plans upon adoption, ensuring alignment with the latest National Planning Policy Framework (NPPF) and any relevant planning reforms. Future Local Plan Reviews will provide an ongoing contingency mechanism to assess and update policies as necessary. This is particularly relevant given that the housing trajectory shows the first homes being delivered from 2029/2030. Peak

build out rates occur in Years 10 – 15 (2036 onwards) and housing delivery also goes beyond the Local Plan period.

- 5.5 Therefore, the evidence to date, suggests the delivery rates set out are reasonable and deliverable.
- 5.6 Secondly, it is acknowledged that there is the possibility that HGC does not deliver at the rates expected. If that were to be the case, the most likely implications for SADC's Plan is that the annual housing requirements would still be met, made up from a combination of:

- Current progress made with planning application processes for other allocated sites, which may come forward more quickly than the updated Housing Trajectory calculations;
- Flexibility already built into the Plan
- Additional housing land supply coming forward at the current time in the context of 'Grey Belt'
- Immediate review of the Plan
- Monitoring & review of the Housing Trajectory

- 5.7 Further detail is set out below.

Current progress made with planning application processes for other allocated sites, which may come forward more quickly than the updated Housing Trajectory calculations

- 5.8 Across the SADC District, many of the non-HGC allocated sites are in advanced Pre-Planning Application Stage or have submitted planning applications. Table 2 provides an overview of the status of other sites in the SADC Local Plan, as follows:

Table 2: SADC - Status of non-HGC allocated sites

	Reference Number	Location	Status	Net Number of Dwellings
1	5/2024/2271 (Allocation B1)	North St Albans (Land Off Sandridgebury Lane And Between The Railway And Harpenden Road, St Albans, Hertfordshire)	Application pending	1,044
2	N/A (Allocation B2)	North East Harpenden	Pre-Application (Planning Performance Agreement)	553 (most of allocation)
3	5/2021/3631 (Allocation B3)	West Redbourn (Land At Gaddesden Lane, Redbourn, Hertfordshire, AL3 7DP)	Application pending	300 (most of allocation)
4	N/A (Allocation B4)	East St Albans	Pre-Application (Planning Performance Agreement)	511

	Reference Number	Location	Status	Net Number of Dwellings
5	N/A (Allocation B6)	West of London Colney	Pre-Application	439
6	5/2023/0327 (Allocation B7)	North West Harpenden (Land At Cooters End Lane And Ambrose Lane, Harpenden)	Application pending – NB: Committee resolution to grant permission, subject to completion of a legal agreement	492
7	N/A (Allocation L1)	Burston Nurseries, North Orbital Road, St Albans	Pre-Application	186
8	5/2025/0531 (Allocation L2)	West of Watling Street, Park Street (Land Between Caravan Site And Watling Street, Park Street, St Albans, Hertfordshire)	Outline planning permission 5/2022/0267, Reserved Matters Pending Application 5/2025/0531	95
9	5/2025/1359 (Allocation L3)	East and West of Miriam Lane, Chiswell Green (The Noke Hotel, Watford Road And Land East And West Of Miriam Lane, Chiswell Green, St Albans, Hertfordshire, AL2 3DS)	Application pending	219
Total				3,839

Flexibility already built into the Plan

- 5.9 There is already a sufficient degree of flexibility included in the SADC Local Plan. This flexibility is reflected in the way the spatial strategy has been structured, allowing for a range of delivery scenarios across the Plan period.
- 5.10 In particular, the updated Housing Trajectory has been updated and re-calibrated, but for some sites is still taking a somewhat cautious and conservative approach. This means that, in practice, a number of the allocated sites may come forward earlier than currently anticipated. SADC deliberately, as a contingency for HGC, has nothing in draft Local Plan Policy to stop non-HGC sites coming forward sooner than as set out in the Housing Trajectory.

Additional housing land supply coming forward at the current time in the context of 'Grey Belt'

- 5.11 There is clear evidence of additional housing land supply coming forward at the current time and in the context of 'Grey Belt', this is set out within M6I6Q5 Appendix 1 "Housing Trajectory – Additional Homes Context", as reproduced below.

Housing Trajectory – Additional Homes Context

Potential additional non-allocated housing resulting from the introduction of 'grey belt'

1. The SADC housing trajectory includes Windfall at 145pa. The Housing Land Supply, Windfall & Capacity Evidence Paper (2024) ([HOU 01.02](#)) sets out in Section 5 'Windfall Rate' the predicted windfall yield by site type based on 2013-2023 data. The windfall figure excludes Green Belt predominantly green field development with a capacity of 5+ homes.
2. A significant contextual factor to bear in mind when considering the Housing Trajectory and the likely amount of other 'windfall' development is the impact of the introduction of 'grey belt' in the NPPF in December 2024, plus the related guidance of February 2025.
3. In summary there is strong evidence that there are a significant number of Green Belt predominantly green field sites (excluded from windfall calculations as above) which are currently in pre-application discussions or have live planning applications or appeals which may be considered to constitute 'grey belt'. There is a reasonable likelihood that a significant number of these sites would fall within 'grey belt' when applying the February 2025 guidance.
4. To indicate the scale of the potential additional dwellings from this source during the Plan period, the following current pending applications / appeals / pre-application inquiries are for sites which may be considered to constitute 'grey belt', some of which are likely to be determined prior to adoption of the draft Local Plan:

	Reference Number	Location	Status	Net Number of Dwellings
1	5/2025/1160	Land East Of Kingsley Green, Harper Lane, Shenley, Radlett, Hertfordshire	Pending Application	200
2	5/2023/1923	Land Between The Alban Way And Colney Heath Lane, St Albans, Hertfordshire	Pending Application	190
3	5/2025/0111	Land Bounded By The Rivers Colne And Ver And Radlett Road, Frogmore, St Albans, Hertfordshire	Pending Application	183
4	5/2024/1752	Land Rear Of Round House Farm, Roestock Lane, Colney Heath, St Albans, Hertfordshire	Pending Application	93
5	5/2025/1218	Land Adjacent To Sandridge Garage, Sandridgebury Lane, St Albans, Hertfordshire	Pending Application	49
6	5/2022/0599	Land To Rear Of 96 To 106 High Street, Colney Heath, Hertfordshire	Pending Appeal	45
7	5/2024/2007	Land Between The White Barn And 42 Tollgate Road, Colney Heath, St Albans, Hertfordshire	Pending Application	30
8	5/2024/2293	Land Rear Of Noke Side & Long Fallow And 4 Noke Side,	Pending Application	26

	Reference Number	Location	Status	Net Number of Dwellings
		<i>Chiswell Green, St Albans, Hertfordshire</i>		
9	N/A	<i>A Green Belt greenfield site near Redbourn</i>	<i>Pre-Application</i>	900
			Total	1,716

Immediate review of the Plan

- 5.12 As set out in the NPPF 2024, There is the expectation that both Councils would commit to an immediate review of the Local Plan, following adoption. For SADC, as set out in SADC/ED85C main modification table, SADC are committed to an early review of the Local Plan. Therefore, subsequent Local Plans will seek to update and review build-out rates and permissions.

Monitoring & Review of the Housing Trajectory

- 5.13 Regarding the Housing Trajectory, the SADC Local Plan includes a Monitoring Framework including indicators to monitor the delivery and supply of housing. This can be found at Appendix 6 – Monitoring Framework of The Reg 19 Local Plan Part A (2024) (LPCD 02.01) on pages 162:

1 – A Spatial Strategy for St Albans City and District Policy

SP1 – A Spatial Strategy for St Albans District

Proposed Measures/ Indicators

Net additional dwellings completed

Target

Adopted LP requirements

...

3 – Sustainable Use of Land and Green Belt Policy

SP3 – Land and the Green Belt

Proposed Measures/ Indicators

Net additional dwellings completed

Target

Adopted LP requirements

3 – Sustainable Use of Land and Green Belt Policy

SP3 – Land and the Green Belt

Proposed Measures/ Indicators

Five year land supply (estimated dwelling numbers)

Target

Adopted LP requirements

Should the Plans be modified include additional flexibility, or a fallback position if the HGC proposals are delayed?

- 5.14 As set out above, there is considered to already be an appropriate degree of contingency and flexibility in the Local Plans (and a positive contextual position of additional housing land supply coming forward) if the HGC proposals are delayed.

Q6 Has adequate viability testing been carried out to assess the cumulative costs associated with bringing forward the proposals at HGC? Are the component parts of the HGC viable, taking into account all likely costs, including strategic highways and infrastructure costs?

Has adequate viability testing been carried out to assess the cumulative costs associated with bringing forward the proposals at HGC?

- 6.1 Yes, it is considered that adequate viability testing has been carried out to assess the cumulative costs associated with bringing forward the proposals at HGC and that the component parts of the HGC are viable, taking into account all likely costs, including strategic highways and infrastructure costs.

- 6.2 The NPPF principally addresses viability at:

58. Where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into force. All viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publicly available.

...

69. Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.

- 6.3 The PPG addresses Viability in a number of places, including:

How should plan makers and site promoters ensure that policy requirements for contributions from development are deliverable?

The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to

ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.

It is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies. Drafting of plan policies should be iterative and informed by engagement with developers, landowners, and infrastructure and affordable housing providers.

Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage.

It is the responsibility of site promoters to engage in plan making, take into account any costs including their own profit expectations and risks, and ensure that proposals for development are policy compliant. Policy compliant means development which fully complies with up to date plan policies. A decision maker can give appropriate weight to emerging policies. The price paid for land is not a relevant justification for failing to accord with relevant policies in the plan. Landowners and site purchasers should consider this when agreeing land transactions.

See related policy: National Planning Policy Framework [paragraph 34](#)

Paragraph: 002 Reference ID: 10-002-20190509

Revision date: 09 05 2019 See [previous version](#)

- 6.4 SADC answered a broadly similar question in response to the Inspectors' Initial Questions Q17, as set out below:

Question 17 – Based on the answers to the questions above, how have the associated costs and viability of the sites been accurately established and tested?

The Council considers there is sufficient evidence to date to demonstrate the SADC HGC site allocations' viability. Each of the HGC site allocations (H1, H2, H3 and H4) has been appraised through the Local Plan Viability prepared by BNP Paribas in 2024 (INF 10.02, INF 10.03, INF 10.03, and INF 10.09). As set out above, in response to Question 16, The BNP Paribas viability testing demonstrates that all 4 HGC site allocations are viable and developable, having regard to both the Council's planning policy, highways and infrastructure requirements as set out in the SADC IDP, including 40% affordable housing, highways and infrastructure mitigation, including appropriate contributions towards Junction 8 improvements (Phase 1-3). BNP Paribas viability evidence considers the 4 HGC site allocations to be developable as required by the NPPF i.e. it has a 'reasonable prospect' of being available and viably developed within the plan period.

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. The HGC Framework Plan exercise was undertaken 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 draft Local Plan Site Allocation Hm01);

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 a cross-boundary infrastructure schedule aligned with the Infrastructure Delivery Plans (IDPs) of each Local Planning Authority.

The outcomes of the HGC Framework Plan, including the cross-boundary infrastructure schedule and viability appraisal, were shared with and considered by BNP Paribas and Arup during preparation of the site-specific Local Plan viability appraisals (INF 10.02, INF 10.03, INF 10.03, and INF 10.09) and the SADC Local Plan IDP (INF 01.01; INF 01.02). To summarise, the HGC Framework Plan exercise has produced a holistic spatial framework; and provides robust evidence supporting site allocations within the Local Plan and that the HGC growth areas are feasible and deliverable. Its outcomes have informed the BNP Paribas viability appraisals and the SADC Local Plan IDP.

While the SADC IDP (2024), BNP Paribas Viability, and the HGC Framework Plan are considered to provide sufficient evidence to support the draft Local Plan allocations at HGC to date, as would be expected with a major project such as HGC, viability and costs will continue to be iterated and reviewed. Viability work is underway in association with the overall HGC IDP to 2050. Additional viability work will continue to be updated in line with the latest HGC programme developments.

- 6.5 As set out above, for SADC the BNP Paribas viability work provides adequate viability testing which has been carried out to assess the cumulative costs 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.

- 6.6 Additionally, through the HGC Framework Plan exercise, cumulative and component costs were assessed for the HGC Growth Areas. Because of the commercially confidential nature of some parts of that exercise, they are not in the public domain. However, the key landowners including The Crown Estate, Pigeon, Bloor, Kitewood (and DBC as a landowner) as well as SADC and DBC were involved in the exercise and it did show that HGC was cumulatively viable and that the component parts were viable. This positive viability assessment was a significant factor in providing a substantive basis for the key landowners to 'press go' for the PPA processes that commenced in 2024 and the multi-million pound expenditure to enable the progression of planning applications for all of the HGC Growth Areas within SADC – H1 (Pigeon and Bloor) and H2-H4 (The Crown Estate).
- 6.7 The Emerging Draft HGC IDP to 2050 is appended at M6I4Q1 - Appendix 1 and Appendix 2. As is set out, there are a few important caveats to note with regard to the Emerging Draft HGC IDP:

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 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.

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.

...

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.

6.8 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).*

- 6.9 As above, 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 to 2050 are well understood. The Emerging Draft HGC IDP to 2050 is fundamentally not a viability tool. It is also, at this time, still an evolving 'work in progress' document.
- 6.10 The approach taken to infrastructure in the Emerging Draft HGC IDP to 2050 is understandably different from that taken in the BNP Viability work (as would be expected – one is fundamentally looking at viability and one is fundamentally looking in detail at infrastructure provision).
- 6.11 However, in general terms, one can draw general inferences from the Emerging Draft HGC IDP to 2050. The inference that can be clearly drawn from the Emerging Draft HGC IDP to 2050 with regard to Local Plan viability is that the SADC HGC sites H1-H4 are viable, as was found in the SADC BNP Viability work (see paragraph 6.5 above).
- 6.12 It is also considered important to note that the landowner/developer teams have undertaken their own viability work, sufficiently to give them the confidence to spend millions of pounds, to bring forward the planning applications through the PPA processes in 2024 and 2025 (and millions of pounds on technical work before that time). These applications are progressing well and are due to be submitted in Autumn/Winter 2025.
- 6.13 Overall, it is considered that adequate viability testing has been carried out to assess the cumulative costs associated with bringing forward the proposals at HGC and that the component parts of the HGC are viable, taking into account all likely costs, including strategic highways and infrastructure costs. The respective viability work undertaken and published at Local Plan Regulation 19 stage is sufficient to demonstrate the viability of HGC. The additional viability work undertaken with regard to the Framework Plan and the additional viability work undertaken with regard to the progression of the planning applications by the landowners/developers give further evidence in this regard.
- 6.14 As would be expected with a major project such as HGC, viability and costs will continue to be iterated and reviewed by both the Councils and the landowner/developer teams.