

Matter 6 – Hemel Garden Communities ('HGC')

Issue 9 – East Hemel Hempstead (Central) – H3

15. Site H3 is allocated as an 'employment led mixed use (Enterprise Zone)'. Unlike allocations H1, H2 and H4, allocation H3 does not specify a quantum or capacity of employment land, nor what proportion of the site is anticipated to be developed within the plan period.

Q1 What is the scale of development proposed, how has it been established and is the Plan clear and effective around the types of development permitted?

- 1.1 The scale of development proposed at Site H3 is considered to have been clearly defined and the Plan is considered to be clear and effective around the types of development permitted. Evidence to support the establishment of employment land at East Hemel Hempstead Central (H3) includes:

- EMP 01.01 - South West Herts Economic Study (2024)
- LPCD 03.01 - St Albans Local Plan Sustainability Appraisal Report (2024)
- LPSS 01.01 - Local Plan Site Selection Methodology Outcomes and Site Allocations
- HGC 02.01 - Delivery Statement - update (Nov 2024)
- HGC 03.01 - Spatial Vision (2021)
- HGC 04.02 - Framework Plan Story Document (2024)
- HGC 04.03 - Framework Plan Technical Evidence Report (2024)
- HGC 08.01 - Socio-economic and Demography Study (2024)
- HGC 08.02 - Higher Education and Research Opportunities (2024)

- 1.1 Strategic Policy SP5 identifies the following:

b) New industrial and business locations will be designated as follows:

- i. 53 ha of Employment land at East Hemel Hempstead (Central) providing for a range of uses including offices, research and development, light industrial and distribution, with 10% of any new development or redevelopment required to contain units for Small Medium Enterprises and expansion / Grow-On units;*

- 1.2 The East Hemel Hempstead (Central) is part of the broader Hemel Garden Communities (HGC) programme and site allocation process. Local Plan Part A (2024) (PCD 02.01) Policy LG2 – Support for Transformation of Hemel Hempstead states that:

An expanded Maylands Business Park, the Hertfordshire Innovation Quarter, will provide new higher skilled employment and learning opportunities with the creation

of around 6,000 jobs. Further job creation, will be enabled in the HGC Growth Areas including in the education, retail, health and leisure sectors.

- 1.2 The scale of development is further set out in Part B of the Local Plan at:

Integrated Neighbourhoods

9. A 53 Hectare extension to Maylands Business Park, to the north of Breakspear Way and south of Punchbowl Lane, in accordance with the aims and status of the Hertfordshire Enviro-Tech Enterprise Zone (Hertfordshire Innovation Quarter) to deliver integrated Enviro-Tech Businesses, environmentally friendly buildings and complementary uses.

10. Employment uses including high quality offices, research and development, light industrial and logistics. Ancillary uses will be supported where they meet the needs of businesses. An over-concentration of low employment generating logistics uses will not be permitted.

11. The southern approximately 17 Hectares of the site will promote high density, higher skilled employment uses to deliver a Business, Research and Development Park and explore opportunities for education. The first phase of employment development will provide an innovation hub prioritising space for start-up units in high quality buildings and units that provide grow on space for small businesses and support the growth of life science and agri-tech businesses.

12. The remaining approximately 36 Hectares to the north of the site will promote uses such as logistics and mixed industrial areas.

...

Self-sustaining Economy

21. A mix of employment uses linked to the Council's recent evidence base, and vision for Herts IQ to enable, around 6,000 jobs. The jobs growth will support rebalancing the local economy by prioritising higher-skilled jobs and learning opportunities for Hemel Hempstead and South West Hertfordshire.

- 1.3 The South West Herts Economic Study 2024 EMP (01.01) builds upon an extensive evidence base in relation to economic and employment related matters, as set out in the Examination Library in documents EMP 01.01 to EMP 06.01. The proposed employment-led development at H3 aligns with the National Planning Policy Framework (NPPF), which supports the provision of sufficient land of the right type, in the right locations, to meet identified business needs. The NPPF encourages planning for clusters of knowledge-driven, innovative industries, which is reflected in the vision for the Hertfordshire Innovation Quarter. EMP 01.01 confirms that the employment land at H3 is deliverable within the Local Plan period, supporting the strategic employment needs of the District and wider sub-region.
- 1.4 The site lies within the Hemel Garden Communities Programme Area, as identified in the HGC Charter (Hemel Garden Communities Charter November 2018, available via HGC 09.01 – ‘Link to Hemel Garden Communities Webpage’), submitted as part of the successful Garden Town bid to MHCLG, and is further supported by the HGC Spatial Vision (HGC 03.01 - Spatial Vision (2021)). The site contributes to the wider

benefits of the Garden Communities programme, including meeting long-term employment need and job creation, supporting coordinated development and infrastructure across the sub-region, in line with national policy objectives.

- 1.5 The Framework Plan for H3 has tested development capacity, ensuring the site can accommodate the proposed scale of employment floorspace. The Framework Plan evidence suite (HGC 04.01 – 04.04) sets out on Page 29 of HGC 04.02:

EMPLOYMENT AREA

The new employment area should be attractively designed to:

- *Create high quality public realm and open spaces to enable healthy and sustainable working and travel environments.*
- *Integrate with the wider economic eco-system and supply chains across Maylands and Hertfordshire.*
- *Provide buildings, facilities, services and spaces that foster innovation, enterprise and skill development opportunities.*

- 1.6 N.B. A Main Modification is proposed which reflects the most recent evidence of jobs likely to be created as 4,000 rather than 6,000 jobs, as set out in SADC/ED85A, SADC/ED85B and SADC/ED85C. Further detail on this point is set out in response to M6I3Q5.
- 1.7 Overall, the Plan is considered to be clear and effective in setting out the types of development permitted. Part B of the Plan specifies that the site is intended for. In addition, Policy LG3, the overarching policy, further clarifies the types of development that would be permitted, ensuring consistency and transparency in planning decisions.

Q2 How will development proposals come forward in a coordinated and coherent manner that achieves the aims and objectives of the HGC?

- 2.1 Development proposals within Hemel Garden Communities (HGC), and the employment proposals at H3, will be brought forward in a coordinated and coherent manner through a combination of robust policy frameworks, strategic governance, and collaborative delivery mechanisms and a single outline planning application for site allocations H2, H3 and H4.
- 2.2 The proposed Local Plan policy has been specifically developed to ensure alignment with the aims and objectives of HGC. Policy LG3 sets out the overarching principles for sustainable growth, placemaking, and infrastructure delivery across the Garden Communities. The policy structure utilises one of the pillars from the HGC Spatial Vision (HGC 03.01 - Spatial Vision (2021)) the 'self-sustaining economy' which sets out:

Prioritise higher skilled jobs and learning opportunities in Herts IQ / Maylands Business Park and Hemel Hempstead Town Centre to help balance communities,

and promote development and jobs creation that supports learning, enterprise, innovation and skills diversification;

- 2.3 Site Allocation H3 (Part B) provides detailed guidance for the employment-led development at Maylands, ensuring proposals come forward in accordance with the Maylands Masterplan, which establishes a clear spatial and design framework for the area. Part B Key development requirements include:

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.

- 2.4 The Crown Estate, which holds near-total ownership of Site H3, has indicated its intention to act as master developer, enabling a unified and strategic approach to delivery. The emerging work under a Planning Performance Agreement (PPA) is helping to shape a coordinated delivery programme. This is additionally supported by the Statement of Common Ground between SADC and The Crown Estate (SADC/ED12) which sets out that:

SADC and TCE generally support what is set out in the Local Plan Part B, including the Key Development Requirements for sites H2, H3 and H4.

- 2.5 The HGC Spatial Vision (HGC 03.01 - Spatial Vision (2021)) articulates the long-term aspirations for the area, including the development of East Hemel Central, as part of the Hertfordshire Innovation Quarter, which supports growth in Enviro-Tech. These objectives are reinforced through Policy EMP4, which promotes innovation-led employment and sustainable economic development:

'The Hertfordshire Economic Board 'Hertfordshire Futures' recognises the growth potential of green sectors. The BRE and Rothamsted sites are included in the Hertfordshire multi-site Envirotech Enterprise Zone, which focused on environmental technologies. This has been re-branded as Hertfordshire Innovation Quarter (Herts IQ).

Herts IQ includes the proposed 53 hectare East Hemel Central Broad Location in St Albans District. There are also proposals in this Plan, as can be seen on the Policies Map, for a modest expansion of the current Rothamsted campus to the south and north-west.

EMP4 - Hertfordshire Innovation Quarter (Herts IQ)

The Council supports development and redevelopment which provides or supports knowledge-based research and development activities for Herts IQ at the following locations:

Rothamsted Research – including expansion of the site through two allocations OS3 and OS4 set out in Part B;

Building Research Establishment (BRE); and

The proposed employment area at East Hemel Hempstead (Central).

- 2.6 The HGC Programme governance structure, as set out in the HGC Delivery Statement (HGC 02.01 - Delivery Statement - update (Nov 2024)) provides strategic oversight and ensures cross-boundary coordination. Sub-groups such as the Transport Sub-Group and the Developers Forum regularly meet to steer infrastructure delivery and cross-boundary working. Collaboration Agreements are being pursued to formalise joint working arrangements between developers, ensuring infrastructure and services are delivered in a timely and integrated manner.

Q3 What is the justification for criterion 16 under Policy H3 which safeguards land to the east of Junction 8 of the M1? Does this form part of the allocated site, and if so, what are development proposals expected to do in order to achieve compliance with the policy?

What is the justification for criterion 16 under Policy H3 which safeguards land to the east of Junction 8 of the M1?

- 3.1 On reflection, the Council considers that, while there needs to be an appropriate reference to land within H3 at criterion 16, the land to the east is addressed under Policy TRA2 in the Plan in Part A and as is annotated as relating to Policy TRA2 on the Policies Map. The Council is therefore proposing a Main Modification as set out in SADC/ED85B and SADC/ED85C and as replicated below:

16. Land, ~~including land to the east of Junction 8,~~ will be safeguarded for access improvements associated with Junction 8 of the M1 motorway, in case it is required to come forward for junction improvements.

Q4 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

What is the justification for the proposed alteration to the Green Belt boundary?

- 4.1 The primary justification is the need to deliver the growth requirements for the District. Strategic employment needs in the District are set out in the South West Herts Economic Study (EMP 01.01), which provides an assessment of the employment land needs of South West Herts authorities over the periods 2021 to 2041 and 2041 to 2050.

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

- 4.2 Yes, the proposed boundary alteration is considered to be consistent with paragraph 148 e) and f) which states:

148. When defining Green Belt boundaries, plans should:

...

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

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

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

4.3 Step 2: Defining Sub-area Boundaries

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

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

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

Table 4.2 Boundary Features for Identifying Sub-areas

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

- 4.4 *Sub-area boundaries were initially defined through desk-based assessments of publicly available data, including aerial photography, Ordnance Survey maps 'birds eye' views and Google Earth. Boundaries were adjusted as necessary, based on on-site observations during the site visits, to reflect the site characteristics as accurately as possible. This process of refinement accounted for the local context of the sub-area and involved an element of professional judgement. Each sub-area was assigned a unique reference number, (Figure 4.6 and 4.7).*
- 4.5 Potential Green Belt boundaries were considered in the Green Belt Review Proforma Annex Report (2023) (GB 02.03). For this site, relating to sub area SA-167 (page 738), SA-166 (page 734), they were:

SA-167

Consideration of Boundaries

Commentary on boundary features and impact on Green Belt boundary strength

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

Categorisation & Recommendation

Sub-area category & recommendation

The sub-area performs strongly against the NPPF purposes but makes a less important contribution to the wider Green Belt. If the sub-area was released, the new inner Green Belt boundary would meet the NPPF definition for readily recognisable and likely to be permanent boundaries. Recommended for further consideration in isolation as RA-53 or in combination with SA-166 and the northern part of SA-165 as RC-12.

SA-166

Consideration of Boundaries

Commentary on boundary features and impact on Green Belt boundary strength

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

Categorisation & Recommendation

Sub-area category & recommendation

The sub-area performs moderately against the NPPF purposes but makes a less important contribution to the wider Green Belt. If the sub-area was released, the new inner Green Belt boundary would meet the NPPF definition for readily recognisable and likely to be permanent boundaries Recommended for further consideration in isolation as RA-52; or in combination with the northern part of SA-165 and SA-167 as RC-12.

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

Strategy + Guidelines:

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

- 4.7 Landscape features also have a key role in defining the site boundary, with the northern boundary defined by Punchbowl Lane, the eastern boundary by the M1 and the southern boundary by the A414. The western boundary is defined by Green Lane, the existing urban edge of Hemel Hempstead which comprises the Maylands industrial estate, and the District boundary.
- 4.8 The overall site boundary conforms largely to the extent of the land owned by site promoter The Crown Estate. The ownership can be seen on page 26 of HGC 02.01 - Delivery Statement - Update (Nov 2024).
- 4.9 The whole of site H3 will form an urban extension to Hemel Hempstead and be removed from the Green Belt. There is effectively a single new logical extension to the Green Belt boundary in the Plan which adjoins to up to the extent of the M1 Motorway (denoted as the purple line boundary brown on the LPCD 02.05 - Draft Policies Map 3 of 4 (South-West) (2024)) leading directly into the extents of the Green Belt boundary of Site H2 – East Hemel Hempstead (North) to the North and Site H4 – East Hemel Hempstead (South) to the South.
- 4.10 Overall, the proposed boundary alteration will not need to be altered at the end of the Plan period and has clearly defined boundaries using physical features that are readily recognisable and likely to be permanent.

Q5 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

- 5.1 Yes, it is considered that the exceptional circumstances do exist to justify amending the Green Belt boundary in this location.
- 5.2 The Reg 19 Local Plan Part A (2024) (LPCD 02.01) Strategic Policy SP5 - Employment and the Local Economy sets out how SADC is expected to assist other South West Hertfordshire local authorities in meeting the requirements for employment land through the allocations at site H3:

b) New industrial and business locations will be designated as follows:

- i. 53 ha of Employment land at East Hemel Hempstead (Central) providing for a range of uses including offices, research and development, light industrial and distribution, with 10% of any new development or redevelopment required to contain units for Small Medium Enterprises and expansion / Grow-On units;*
- ii. 33.16 ha of the Government permitted Strategic Rail Freight Interchange at the former Radlett aerodrome - mostly B8 distribution / warehousing.*

Due to these locations providing an agreed oversupply for St Albans District's own needs, the excess will assist Dacorum Borough and potentially other South West Herts local authorities in meeting some of their employment requirements.

- 5.3 The strategic case to amend Green Belt boundaries is set out in answer to Stage 1 Matter 3, Issue 3, Question 1 and as addressed in GB 01.01 Green Belt and Exceptional Circumstances – Evidence Paper (2024), which sets out in paragraph 7.3 that:

The Council has concluded that 'Exceptional Circumstances' do exist and it is necessary to amend Green Belt boundaries as set out in the draft Local Plan and its Policies Map. This includes amendments to facilitate both primarily residential and primarily employment land.

- 5.4 GB 02.02 - Green Belt Review Report (2023) recommended areas to be considered further for Green Belt release. For this site in particular, the Green Belt Review assessment found in GB 02.03 - Green Belt Review Annex Proforma Report (2023) on pages 736 to 738, relating to sub-area SA-167, states:

Purpose Assessment

Summary

The sub-area performs strongly against the purposes overall. The sub-area meets purpose 1 criteria (a) and performs moderately against purpose 1 criteria (b). The sub-area does not meet purpose 4, performs weakly against purpose 2 and performs strongly against purpose 3.

Wider Green Belt Impacts

Summary

Overall, the sub-area plays an important role with respect to the strategic land parcel, however its release in isolation or in combination with SA-166 is unlikely to significantly harm the performance of the wider Green Belt.

Sub-area category & recommendation

The sub-area performs strongly against the NPPF purposes but makes a less important contribution to the wider Green Belt. If the sub-area was released, the new inner Green Belt boundary would meet the NPPF definition for readily recognisable and likely to be permanent boundaries. Recommended for further consideration in isolation as RA-53 or in combination with SA-166 and the northern part of SA-165 as RC-12.

- 5.5 Also for this site, GB 02.03 on pages 732 to 734, relating to sub-area SA-166, states:

Purpose Assessment

Summary

The sub-area meets the purposes moderately overall. The sub-area meets purpose 1 criteria (a) and performs moderately against purpose 1 criteria (b). The sub-area does not meet purpose 4, performs weakly against purpose 2 and performs moderately against purpose 3.

Wider Green Belt Impacts

Summary

Overall, the sub-area does not play an important role with respect to the strategic land parcel, and its release in isolation or in combination with the northern part of SA-165 and SA-167 is unlikely to significantly harm the performance of the wider Green Belt.

Sub-area category & recommendation

The sub-area performs moderately against the NPPF purposes but makes a less important contribution to the wider Green Belt. If the sub-area was released, the new inner Green Belt boundary would meet the NPPF definition for readily recognisable and likely to be permanent boundaries. Recommended for further consideration in isolation as RA-52; or in combination with the northern part of SA-165 and SA-167 as RC-12.

- 5.6 The site was considered in the round in the site selection work, which included contextualising and balancing the results of the Green Belt Review with other factors. For this location, the site selection outcome is set out across a proforma assessment (Part of M-033) on pages 8 to 10 in LPSS 02.03 - Green Belt Sites Recommended HGC Proformas. This is set out in particular in the Qualitative Assessments:

The site is recommended for further consideration by the Green Belt Review Stage 2 Report...

This site adjoins Hemel Hempstead which is a Tier 1 Settlement. It offers a comprehensive range of very significant Economic, Environmental and Social

benefits including; a significant scale of sustainable transport improvements and employment provision.

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

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

The site is recommended to progress.

- 5.7 The site lies within the Hemel Garden Communities Programme Area, as identified in the HGC Charter (Hemel Garden Communities Charter November 2018, available via HGC 09.01), submitted as part of the successful Garden Town bid to MHCLG, and is further supported by the HGC Spatial Vision (HGC 03.01 - Spatial Vision (2021)). The site contributes to the wider benefits of the Garden Communities programme, including meeting long-term housing needs and job creation, supporting coordinated development and infrastructure across the sub-region, high-quality placemaking, in line with national policy objectives.
- 5.8 Overall, the site selection work concluded that the site was recommended to progress, and the exceptional circumstances are considered to exist to justify amending the Green Belt boundary in this location.

Q6 How have the landscape impacts of the allocation been considered, having particular regard to the setting of the Chilterns National Landscape?

- 6.1 The landscape impacts of the allocation have been considered in the evidence submitted to date. This includes:

- LPSS 02.03 - Green Belt Sites Recommended HGC Proformas (2024)
- GB 02.02 - Green Belt Review Report (2023)
- GB 02.03 - Green Belt Review Annex Proforma Report (2023)
- EDH 05.01 - Landscape Visual Impact Appraisals Broad Locations SADC Local Plan Sites (2024)
- EDH 09.01 - Herts Landscape Character Area Statements St Albans District
- LPCD 03.01 - St Albans Local Plan Sustainability Appraisal Report (2024)
- HGC 04.03 - Framework Plan Technical Evidence Report (2024)
- HGC 04.02 - Framework Plan Story Document (2024)
- HGC 07.01 - Green Infrastructure Strategy Final Draft (2024)

- 6.2 The Levelling-up and Regeneration Act 2023 places a duty in relation to the Chilterns National Landscape. The NPPG¹ sets out:

The Protected Landscapes duty

...

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

...

What a relevant authority should do

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

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

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

Stage 2 – Desk Study

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

- 6.4 EDH 05.01 page 21 sets out:

Intervisibility with Chilterns National Landscape

N/A

- 6.5 EDH 05.01 page 21-22 then sets out to conclude the following:

POTENTIAL DEVELOPMENT EFFECTS

Designated Landscapes

N/A

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

- 6.6 As set out above EDH 05.01 finds no intervisibility with the Chilterns National Landscape, nevertheless the evidence did assess more broadly relevant landscape impacts.
- 6.7 EDH 05.01 contains the landscape and visual appraisal for site H3 and this is set out page 20 to 23. Page 22-23 proposes the following mitigation and enhancements:

MITIGATION + ENHANCEMENT

Landscape and visual effects could be minimised or reduced by the following:

STRATEGIC MEASURES

- *Respond to context and character.*
- *Retain and protect important landscape features and views.*
- *Create multifunctional green/blue infrastructure and open space networks for people and/or wildlife.*
- *Provide new structural native planting.*
- *Mitigate impact of motorway noise*

SITE SPECIFIC MEASURES

- *The site extends between the existing settlement edge and the M1 corridor that provides a logical limit to the extension of development eastwards.*
- *The site is proposed for employment led mixed use. Consider locating larger scale and more intensive employment land uses towards the centre of the site, where they relate better to the existing industry at Hemel Hempstead industrial estate.*
- *Along the eastern boundary consider structural woodland planting alongside the M1 corridor to help mitigate noise and create a wildlife corridor.*
- *Conserve and enhance hedgerows and trees and rural character of the lanes that bound and cross the site.*
- *Consider opportunity for links with wider network of green infrastructure routes and assets, such as rights of way network east of the M1.*

- 6.8 The HGC 04.02 - Framework Plan Story Document (2024) sets out on page 33:

The green network should include:

...

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

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

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

- 6.10 The HGC 07.01 - Green Infrastructure Strategy Final Draft (2024) sets out:

2.5.14 Opportunities to create and maintain rich, wide and well-connected biodiverse buffers (HGC Green Network spatial principle 7) will be considered throughout the HGC Programme Area to mitigate visual and acoustic impacts of new development and transport infrastructure on sensitive receptors, particularly for new communities associated with the HGC Growth Areas. These include:

- Early structural tree planting to create a multi-functional wooded landscape buffer, incorporating community and outdoor recreation uses, will be considered to mitigate the visual impact of urban development within the north HGC Growth Area on sensitive views from the Chilterns National Landscape. The design of this green buffer to provide screen planting for protecting the setting of the Chilterns National Landscape should use appropriate tree species, and be informed by the recommendations of the HGC Landscape & Visual Impact Assessment.*

...

2.5.112 Where SANG in the HGC Growth Areas is also intended to fulfil an additional function as a green buffer for protecting the setting of the Chilterns National Landscape, the design will consider incorporating woodland belt planting of appropriate tree species to provide screening to mitigate the visual impact of new development.

- 6.11 The LPCD 03.01 - St Albans Local Plan Sustainability Appraisal Report (2024) sets out:

2.3.1 St Albans City and District lies within the south west of the county of Hertfordshire. To the west is Dacorum Borough, including Hemel Hempstead (which abuts St Albans District) and an extensive area designated as part of the Chilterns National Landscape (formerly AONB).

5.4.17 ... A key concern raised is that HGC would “impact hugely” on the Chilterns National Landscape (formerly AONB). This is obviously a key sensitivity / issue explored further below, but an important point to note here is that the Chilterns AONB Board did not respond to the consultation in 2023. Also, support for HGC to the east and northeast of Hemel Hempstead potentially serves to reduce pressure on the part of the HGC area to the north, which is likely the most sensitive in landscape / National Landscape terms

5.4.17 ... The suggestion is that HGC would result in “effective coalescence” of Hemel Hempstead and Redbourn, but it is clear that a substantial green buffer would be retained through planting and provision of green spaces including the

Country Park and SANG (see Figure 5.8), a separation of at least 1.5km between the built development of HGC and Redbourn's settlement edge being retained. Having said this, the proposed western expansion of Redbourn is noted (see discussion below), and it is also recognised that there is some built form within the propose green buffer.

- 6.12 Overall, the impacts on landscape have been appropriately assessed, having particular regard to the setting of the Chilterns National Landscape and impacts on landscape can be mitigated and are considered to be acceptable.

Q7 What is the justification for criterion 29 and the requirements for contributions towards Strategic Access Management and Monitoring and the provision of Suitable Alternative Natural Greenspace?

- 7.1 The requirements for contributions towards Strategic Access Management and Monitoring and the provision of Suitable Alternative Natural Greenspace are set out in H3 Key development requirement (KDR) 29 as follows:

29. The site lies within the Chilterns Beechwoods Special Area of Conservation (CBSAC) Zone of Influence (ZOI). Generally, use classes for this site will not be relevant in contributing to the CBSAC Mitigation Strategy. However, any relevant uses will need to make appropriate contributions towards the Strategic Access Management and Monitoring Strategy (SAMMS). If relevant, Development proposals will need to make provision for Suitable Alternative Natural Greenspace (SANG), as part of the wider SANG network across the HGC Growth Areas.

- 7.2 As set out in KDR 29, generally use classes for this site will not be relevant in contributing to the CBSAC Mitigation Strategy, but it should be noted that KDR 14 requires residential development at this site as follows: "...Provision of up to 15-20 pitches for Gypsy and Travellers to meet identified need, taking into account existing local provision and the availability of alternative sites as well as best practice on location and design."

N.B. As set out in SADC/ED85B and SADC/ED85C the above requirement is proposed to be separated out from the rest of Regulation 19 KDR 14. This is for clarity and to correct a formatting error.

- 7.3 The effects of development at East Hemel Hempstead (Central) (H3) on the Chilterns Beechwoods Special Area of Conservation (CBSAC) have been considered in the Habitats Regulations Assessment 2024 (LPCD.04.01) (HRA). The HRA sets out in 'Table 3: LP Site Allocation Test of Likely Significant Effects' 'HRA Implications' that the allocation has the 'Potential for Likely Significant Effect'. It also sets out that any adverse impacts on the integrity of the site can be avoided and/or mitigated by adherence to the Council's Mitigation Strategy.

- 7.4 As such, Gypsy and Traveller pitches are required to contribute to the CBSAC Mitigation Strategy. As set out in the MIQ response to Matter 4 Issue 5 Q6:

The effect of the provision of the new pitches at Hemel Garden Communities (HGC) (as set out in Part A Policy HOU6 d) and Part B Key development requirements for sites H3 and H4) on the Chilterns Beechwoods Special Area of Conservation (CBSAC); and the approach to mitigation; are considered in a similar way to the other residential development within the SAC Zone of Influence.

- 7.5 As set out in the Local Plan Part A Policy SP1 and SP10 the Local Plan supports:

Protection and enhancement of the Chilterns Beechwoods Special Area of Conservation (CBSAC);

Make appropriate contributions towards the Strategic Access Management and Monitoring Strategy (SAMMS), where the proposal is for additional housing within the Chilterns Beechwoods Special Area of Conservation (CBSAC) Zone of Influence (ZOI). Such development proposals will also need to make provision for a new Suitable Alternative Natural Greenspace (SANG), or alternatively contribute towards the maintenance of a suitable SANG project elsewhere;

- 7.6 In the emerging planning application, through the Pre-Planning Application process, SANG requirements have been incorporated into the emerging plans. The applicants The Crown Estate (TCE) continue to engage with Natural England on the provision and requirements of the SANG. The 'Environmental Impact Assessment (EIA) Scoping Report East Hemel December 2024' – submitted in support of EIA Scoping Opinion application 5/2024/2171² – states at 5.1.7: *"The Development would provide:... Provision of green infrastructure including provision of Suitable Alternative Natural Greenspace (SANG) and measures to achieve at least 10% Biodiversity Net Gain (BNG) as well as a country park, formal and informal open spaces, amenity spaces and ecological network links."*

- 7.7 The EIA Scoping Report also states at 7.2.22:
As the collection and analysis of baseline data is ongoing the mitigation will be developed in response to survey findings and iterative scheme design. The following main principles will be applied:

...

- *Creation of new country parks and wider networks of Suitable Alternative Natural Greenspaces (SANGs) to promote use of local and strategic greenspaces for wildlife and people;*

² Application 5/2024/2171 documents available via: <https://planningapplications.stalbans.gov.uk/planning>; EIA Scoping Report document available via: <https://planningapplications.stalbans.gov.uk/w2webparts/Resource/Civica/Handler.ashx/Doc/pagestream?cd=inline&pdf=true&docno=10340525>

- 7.8 The effect of development at Hemel Garden Communities (HGC) (as set out in Part A Policy LG2 and LG3) on the Chilterns Beechwoods Special Area of Conservation (CBSAC); and the approach to mitigation; are considered in the HRA; as follows:

Table 2: LP Policies Test of Likely Significant Effects

*Policy LG2 – Support for Transformation of Hemel Hempstead
Potential for Likely Significant Effect.*

This policy identifies the Council's commitment to delivering at least 4,300 net new homes, and the creation of around 6,000 jobs during the plan period in land surrounding Hemel Hempstead (Hemel Garden Communities).

Potential linking impact pathways are recreational pressure, and atmospheric pollution.

LG3 - Hemel Garden Communities Place Principles

No.

This is a development management policy relating to Hemel Garden Communities Place Principles. There are no realistic linking impact pathways present.

This is a positive policy as includes the requirement of SANG to divert recreational pressure away from the sensitive Chilterns Beechwoods SAC.

- 7.9 HRA Table 3: LP Site Allocation Test of Likely Significant Effects sets out in relation to Allocation H3:

Notes

In addition to built development (Employment Led Mixed Use (Enterprise Zone)), the site will include improvements to countryside access link and delivery of the HGC Green Loop

HRA Implications

Potential for Likely Significant Effect.

Located within the 12.6km core recreational Zone of Influence of Chilterns Beechwoods SAC.

The allocation states that: 'The site lies within the Chilterns Beechwoods Special Area of Conservation (CBSAC) Zone of Influence (ZOI). Generally, use classes for this site will not be relevant in contributing to the CBSAC Mitigation Strategy. However, relevant uses will need to make appropriate contributions towards the Strategic Access Management and Monitoring Strategy (SAMMS). If relevant, Development proposals will also need to make provision for a new Suitable Alternative Natural Greenspace (SANG), as part of the wider SANG network across the HGC Growth Areas.'

- 7.10 The HRA identifies in Section 5.3 'In Combination Assessment' that the allocation could potentially result in a Likely Significant Effect upon the SAC in combination, as follows:

5.3.1 The Test of Likely Significant Effects for the LP Policies undertaken in Appendix B identified the following policies that could potentially result in a linking impact pathways to the SAC and thus result in a Likely Significant Effect:

...

- HOU6 – Gypsies, Travellers and Travelling Show People. This policy provides for accommodation of Gypsies, Travellers and Travelling Showpeople within the 12.6km core recreational ZOI [Zone of Influence]. Potential linking impact pathway(s): recreational pressure and atmospheric pollution.*

...

5.3.2 The Test of Likely Significant Effects of the LP Allocations identified nine allocations for residential development are located within the 12.6km core recreational ZOI and that these could result in a Likely Significant Effect upon the SAC in combination. These are:

- H3 - East Hemel Hempstead (Central), HP2 7LF*

7.11 The HRA also sets out in Section 6.1 ‘Recreational Pressure’ paragraph 6.1.1 that this allocations is part of the suite of policies and allocations that “...all provide for new residential development within the 12.6km core recreational ZOI and as such could provide a linking impact pathway to Chilterns Beechwoods SAC via increased recreational pressure (in combination) as a result of increased population living in the new dwellings provided by the LP.”

7.12 The HRA then goes on to consider the mitigation measures in the Draft Plan, as follows:

6.1.2 No further analysis is necessary or possible given the strategic work already undertaken. Rather the focus of appropriate assessment needs to be on mitigation in the form of the available SANG capacity and its provision.

6.1.3 Paragraph 10.8 of the LP acknowledges this issue. It states:

6.1.4 “10.8... A buffer Zone of Influence of 12.6km around this covers part of St Albans District, and the Council is legally required not to issue decisions within this buffer until appropriate mitigation is secured through a Mitigation Strategy. A key element in the Mitigation Strategy will be the identification and/ or creation of Suitable Alternative Natural Greenspace (SANG) to draw people away from using the SAC.

6.1.5 All allocations that provide for new housing that are located within the 12.6km core recreational ZOI include text that acknowledges the relevance of the ZOI by stating “The site lies within the Chilterns Beechwoods Special Area of Conservation (CBSAC) Zone of Influence (ZOI). Appropriate contributions must be made towards the Strategic Access Management and Monitoring Strategy (SAMMS). Development proposals will also need to make provision for a new Suitable Alternative Natural Greenspace (SANG), or alternatively contribute towards the maintenance of a suitable SANG project elsewhere.”

6.1.6 In addition, suitable policy wording of the Local Plan is included within Strategic Policy SP10 to ensure that any windfall development that falls within the 12.6km core recreational ZOI does not result in a likely significant effect and also adheres to the forthcoming Mitigation Strategy.

- 7.13 The HRA then goes on to consider the St Albans Strategic Mitigation Strategy, including the following:

6.1.11 St Albans DC has been working with Natural England and partner authorities (Buckinghamshire Council, Central Bedfordshire Council and Dacorum Borough Council) in preparing the Chilterns Beechwoods SAC Mitigation Strategy. As the landowner, the National Trust has also been involved. The agreed Mitigation Strategy comprises of two parts, the Strategic Access Management and Monitoring Strategy (SAMMS), and Suitable Alternative Natural Greenspace (SANG) provision. The SAMMS addresses issues within the SAC itself. The interventions required have been identified and agreed. A range of projects will be implemented over a period of at least 80 years, (2022/23 to 2102/2103) by the National Trust. To fund the SAMMS, each new home built located within the ZOI within St Albans are required to pay a tariff of £828.6146 (subject to change). The SANG provision will provide alternative natural greenspace for recreation to divert recreational activities away from the SAC. All new residential development within the ZOI must contribute towards either a) a new (bespoke) SANG or b) contribute towards suitable SANG projects elsewhere; this is in addition to contributions towards the SAMMS. Larger developments (10 or more new homes) must provide their own suitable SANG that meets the guidance from Natural England. Smaller developments (1-9 homes) can contribute towards an existing SANG.

6.1.12 As previously detailed the SAMMS element of the Mitigation Strategy has been agreed by Natural England, which leaves only the SANG provision for the development planned by the St Albans Local Plan that requires further analysis. This is provided in the following paragraphs.

- 7.14 The HRA then goes on to consider SANG Provision to Support the Local Plan, including in relation to HGC and the view of Natural England as follows:

6.1.15 A Draft SANG Concept Plan (2023) has been created that identifies up to 277ha of potential SANG land, well in excess of the 211ha required. In a Discretionary Advice Service (DAS) response from Natural England (27th February 2023) regarding the proposed SANG, Natural England states "... that there is a good provision of SANG on-site, and we welcome that the Footprint Ecology standard for calculating SANG capacity of 8ha per 1,000 residents will be met from a pool of 276.5 ha potential SANG land, from which the required area (c.215ha) will be drawn down. Provision of SANG over and above the 8ha per 1,000 residents standard will always be accepted, and we welcome that any additional provision could provide capacity to other developments coming forward in and around Hemel Hempstead.

6.1.16 We view this as a good development site for SANG as the proposed areas have good proportions and enough space to accommodate circular walks with wide gaps in between footpaths. The fact that most of the SANG being proposed are arable land is a positive, as it allows greater flexibility for design of the open space...

6.1.17 ...if taken forward, these SANG would provide visitors with alternative destinations to the Chilterns Beechwoods SAC, with a concurrent positive impact on reducing visitor numbers to the SAC"...

7.15 The HRA concludes:

7.1.5 The Local Plan contains suitable policy wording to ensure that any allocations and any windfall development that falls within the 12.6km core recreational ZOI does not result in a likely significant effect and also adheres to the forthcoming Mitigation Strategy.

7.1.6 Following an analysis of the current position relating to the availability, deliverability and timing of SANG provision in relation to the expected delivery time frames for residential development, it was concluded that, whilst not all allocations have a SANG strategy identified, those without a SANG solution in place are not to be occupied until at least year 6 of the Local Plan. The Council has confirmed that they are confident that appropriate SANG solutions will be delivered for all of the relevant sites within the Local Plan. This confidence is in part demonstrated by the Council's commitment to the Chilterns Beechwoods SAC Mitigation Strategy as agreed in the Council's Policy Committee March 2023. It is considered that with the Chilterns Beechwood SAC Mitigation Strategy in place, and the Council's confidence to deliver SANG in a timely fashion, (acknowledging the excess SANG capacity at Hemel Garden Communities), that no adverse effects on the integrity of the Chilterns Beechwoods SAC would result.

7.16 It is considered that the potential effects of the development at H3 on the CBSAC have been suitably considered in the HRA and in the Plan, and that they will be appropriately mitigated as a result, through provision of SANG onsite and contributions towards SAMMS, as set out in the Plan.

7.17 This position is supported by Natural England, as set out in the Statement of Common Ground between SADC and Natural England (SADC/ED24), where it states:

Mitigating the impact of development on Chiltern Beechwoods SAC

- *12.6km Zone of Influence announced by Natural England where mitigation for new residential development will be required with SANGs and SAMMs.*
- *Strategic matter between:*
 - o SADC*
 - o Dacorum Borough Council*
 - o Central Bedfordshire Council*

*o Buckinghamshire Council
o Natural England*

Conclusion

SADC and NE both support the approach in SADC's Regulation 19 draft Local Plan to mitigating the impact of development on the Chiltern Beechwoods SAC.

- 7.18 Taking the above into account, the justification for H3 criterion 29 and the requirements for contributions towards Strategic Access Management and Monitoring and the provision of Suitable Alternative Natural Greenspace is primarily that it includes Gypsy and Traveller pitches which are considered in a similar way to the other residential development within the SAC Zone of Influence. This approach is reflected in the HRA. It is further considered that the potential effects of the development at H3 on the CBSAC have been suitably considered in the HRA and in the Plan, and that they will be appropriately mitigated as a result, through provision of SANG onsite and contributions towards SAMMS, as set out in the Plan. It is also noted that the Council's approach in this regard is supported by Natural England.

Q8 What is the justification for the provision of accommodation to help meet the needs of gypsies and travellers on H3, and not all other sites within the HGC Programme Area?

- 8.1 The Key development requirements for Sites H3 and H4 include delivery of Gypsy and Traveller pitches, at points 14 and 12 respectively. For H3, Key development requirement (KDR) 14 requires:

"...Provision of up to 15-20 pitches for Gypsy and Travellers to meet identified need, taking into account existing local provision and the availability of alternative sites as well as best practice on location and design."

N.B. As set out in SADC/ED85B and SADC/ED85C the aforementioned requirement at H3 is proposed to be separated out from the rest of requirement 14. This is for clarity and to correct a formatting error.

- 8.2 In relation to the inclusion of pitches within the wider Hemel Garden Communities (HGC); HGC had been identified as far back as 2018 as being the most suitable location for new Gypsy and Traveller sites in the District. As set out at HOU6 d) this is based on *"a variety of factors including proximity to the road network most used by Gypsies and Travellers, development site scale, area topography and landscaping opportunities, and the wide range of uses to be provided in the Broad Locations for development"*...
- 8.3 For the avoidance of doubt, St Albans Gypsy and Traveller need is being provided for within St Albans sites within the Programme Area and not within the Dacorum part of the Programme Area.

8.4 In relation to location of the Gypsy and Travellers pitches at H3 and H4 and not all other sites within the HGC Programme Area: having assessed the 'variety of factors including proximity to the road network most used by Gypsies and Travellers, development site scale, area topography and landscaping opportunities, and the wide range of uses to be provided in the Broad Locations for development' it was considered that Sites H3 and H4 were most suitable. This included, in particular, consideration that H3 was most suitable due it being the largest allocation of its type in the Plan; and the fact that sites H3 and H4 have best access to the M1 and flatter topography than H1 and H2.

8.5 The following points demonstrate that the approach of providing the pitches at sites H3 and H4 is accepted by the land promoters and therefore deliverable:

- HGC 04.03 - Framework Plan Technical Evidence Report (2024) states at 1.11:

The Framework Plan exercise is being undertaken in order to:

...

ii. Test the capacity of the site 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...

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.

...

The Report lists under 'Table 1: Summary of Policy Requirements' and column 'SADC Draft Local Plan Policies from 2023 / 2024 - key components': "*Gypsy and Traveller sites*" "*Between 30-40 pitches*". It also notes in the 'Draft Scenario D Infrastructure Schedule (July 2024)' column 'Infrastructure Item': "*2 x 15 pitch gypsy and traveller sites*".

- The 'Environmental Impact Assessment (EIA) Scoping Report East Hemel December 2024' – submitted in support of EIA Scoping Opinion application 5/2024/2171³ – lists the delivery of the pitches as part of the draft description of development at 5.1.4 as follows: "*The draft Description of Development for EIA purposes is as follows: "Outline application for:...land for up to 40 Gypsy and Traveller pitches..."*". It also states at 5.1.7: "*The Development would provide:... Land for up to 40 Gypsy and Traveller pitches;*"
- SADC/ED12 'Statement of Common Ground between SADC and The Crown Estate' (TCE) notes under Section 3 'Common ground': "*SADC and TCE generally support what is set out in the Local Plan Part A, including the*

³ Application 5/2024/2171 documents available via: <https://planningapplications.stalbans.gov.uk/planning>; EIA Scoping Report document available via: <https://planningapplications.stalbans.gov.uk/w2webparts/Resource/Civica/Handler.ashx/Doc/pagestream?cd=inline&pdf=true&docno=10340525>

housing trajectory for Hemel Garden Communities. SADC and TCE generally support what is set out in the Local Plan Part B, including the Key Development Requirements for sites H2, H3 and H4.”

- 8.6 Overall, the justification for the provision of accommodation to help meet the needs of gypsies and travellers on H3 (and H4) is because of the site specific factors mentioned above. The confirmation of deliverability from the landowner is also beneficial.

Q9 Is Policy H3 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

- 9.1 Yes, it is considered that Policy H3 is justified, effective and consistent with national planning policy.
- 9.2 Policy H3 is justified as the general need for Green Belt release as set out in GB 01.01 - Green Belt and Exceptional Circumstances Evidence Paper (2024).
- 9.3 The specific localised Green Belt impacts are well understood because of the findings of GB 02.02 Green Belt Review (2023) and GB 02.03 Green Belt Review Annex Proforma Report (2023).
- 9.4 Green Belt boundaries are addressed at question 4 above.
- 9.5 The site was considered in the round in the site selection work, which included contextualising and balancing the results of the Green Belt Review with other factors. For this location, the site selection outcome is set out across a proforma assessment (Part of M-033) on pages 8 to 10 in LPSS 02.03 - Green Belt Sites Recommended HGC Proformas (2024).
- 9.6 The site lies within the Hemel Garden Communities Programme Area and will contribute to creating a long term sustainable community which meets housing needs and creates jobs.
- 9.7 Overall, the site selection work concluded that the site was recommended to progress, and the exceptional circumstances are considered to exist to justify amending the Green Belt boundary in this location.
- 9.8 LPCD 03.01 - St Albans Local Plan Sustainability Appraisal Report (2024) goes on to further consider the suitability of site H3 for allocation, which states at paragraphs 5.4.13 to 5.4.15 and 5.4.23:

5.4.13 Beginning with the proposed employment area, which falls entirely within St Albans, it is not only of larger than-local strategic importance, including noting that it is nationally designated as an Enterprise Zone (as part of the Herts Innovation Quarter (IQ); see ‘Crown Land’ here), but the land is also ‘recommended’ by the

Green Belt Review. In this light, its allocation was a 'constant' across the RA growth scenarios in 2023.

...

5.4.23 On balance, the decision reached is that HGC warrants being treated as a constant, in light of the latest evidence and understanding, including via the consultation in 2023.

- 9.9 Policy H3 is effective as the Council has engaged with the landowner(s) of the site and has continued joint working as appropriate with relevant bodies including, HCC, Dacorum Borough Council, the Environment Agency, Historic England and Natural England. This is set out in the agreed Statements of Common Ground / EA Updated response to Local Plan Reg 19:
- SADC/ED12 - Statement of Common Ground between SADC and The Crown estate
 - SADC/ED3 - Statement of Common Ground between SADC and Hertfordshire County Council
 - SADC/ED5 - Statement of Common Ground between SADC and Dacorum Borough Council
 - SADC/ED65 – Appendix 7.2: Environment Agency updated response to Regulation 19
 - SADC/ED23 - Statement of Common Ground between SADC and Historic England
 - SADC/ED24 - Statement of Common Ground between SADC and Natural England
- 9.10 Policy H3 is consistent with national policy as set out in the evidence base in its totality, including in particular the Green Belt Review, the Site Selection process LPSS 01.01 - Local Plan Site Selection Methodology Outcomes and Site Allocations (23 Sep 2024) and LPCD 03.01 the Sustainability Appraisal.
- 9.11 Overall, Policy H3 is considered to be justified, effective and consistent with national planning policy.
- 9.12 N.B. Policy H3 includes proposed Main Modifications as set out in SADC/ED85B and SADC/ED85C.