

**Examination of the Joint Dacorum Borough Council and St Albans City and
District Council Local Plans**

Matters, Issues and Questions (MIQ's)

Matter 6: Hemel Garden Communities ('HGC')

**National Highways' Supplementary Hearing Statement
Added at Q7 17 October 2025**

1. Introduction

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN), including the M1 and M25 motorways and their associated junctions within the vicinity of Hemel Hempstead.

The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We welcome the opportunity to provide evidence to the Stage 2 hearing, focusing on the strategic transport implications of the Hemel Garden Communities proposals, with particular regard to the SRN; specifically, the M1 corridor including Junctions 8 and 9, and the M25 including Junctions 21, 21A and 22, as well as the A414 trunk road.

Our response addresses the relevant Matters, Issues and Questions (MIQs) identified by the Inspectors, with emphasis on Issue 3 – Highways and Transport, and related viability, deliverability, and infrastructure coordination matters.

2. Strategic Context

The HGC proposals represent a significant quantum of growth, with implications for both the SRN and local road networks. National Highways recognises the importance of aligning housing and employment growth with timely and deliverable transport infrastructure.

We have engaged with both Dacorum Borough Council and St Albans City and District Council throughout plan preparation, including input to the strategic transport modelling and their respective Infrastructure Delivery Plans (IDPs).

3. Response to MIQ's

Issue 3 – Highways and Transport

Q1 Is the strategic modelling an appropriate tool for assessing likely impacts of growth at HGC on the strategic road network, and, for determining necessary mitigation?

National Highways considers the COMET strategic modelling undertaken to date to be appropriate for assessing SRN impacts and indicate where mitigation is deemed necessary, albeit not for determining the exact nature of the mitigation. This is therefore being supplemented by more detailed junction-level modelling (Hemel Hempstead Paramics Model (HHPM)).

The HHPM has been used to support the evidence base for the St Albans District Council (SADC), and Dacorum Borough Council (DBC) Local Plan, and specifically to compliment the COMET model, to provide detailed analysis of impacts pertaining to allocations within the Hemel Hempstead area and to provide informatics regarding the level of development which can take place at HGC before each phase of mitigation is required to be in place.

The model continues to be refined by Vectos to reflect updated land use assumptions, trip rates, and modal shift targets, as per ongoing discussions through current regular HGC Transport Group workshops. Whilst the trigger points are yet to be agreed in detail, it is recognised that Phases 1 and 2 of the identified mitigation will need to be delivered during the life of the local plans.

The strategic modelling has also fed into merge/diverge assessments, which are conducted based on DMRB criteria (separate to modelling). Through this process, it has been identified that SADC require (and have proposed) mitigation at M1 J9 to mitigate their Local Plan.

Q2 What are the implications of the growth proposed at HGC on the strategic road network, having particular regard to Junction 8 of the M1?

The proposed growth at HGC as set out in the SADC Local Plan has been shown to result in additional traffic at M1 J8, which without mitigation, would give rise to operational and safety transport issues on the SRN. By contrast, the DBC Local Plan growth in isolation does not create a need for mitigation at this junction.

To address the impacts associated with HGC, a package of mitigation (known as Project Breakspear) has been identified. This comprises three phases, with modelling indicating that Phase 1 and 2 will be required prior to 2041 in order to accommodate SADC Local Plan growth. Phase 3 would not be required until beyond the Plan period.

It is currently understood by National Highways that Phases 1 and 2 will be delivered by, and as part of, the East Hemel development. Work is ongoing through the HGC Transport Working Group to confirm the specific trigger points for each phase.

Q3 – Can any significant highways impacts (in terms of capacity and congestion), or on highway safety, be cost effectively mitigated to an acceptable degree, consistent with paragraph 114 of the Framework? How have the need for highways improvements been costed, and will the sites proposed for allocation at HGC remain viable?

Both SADC and DBC have produced independent transport modelling results to demonstrate the impacts of their own individual Local Plans. Notwithstanding this, due to the interconnectivity of the two authorities and similar stages of the local planning process, a joint approach is also being undertaken to provide a more realistic view of the network should both local plans progress.

A potential mitigation measure has been developed, in conjunction with National Highways, for a scheme at M1 J8 (also referenced as Project Breakspear), which is accepted as being sufficient to accommodate the growth of both local plans.

At this stage, the specific timings of delivery of the project have not been presented as further work is being undertaken to identify the trigger points of development at HGC (as well as the wider local plans), to which the proposed three phases of Project Breakspear is required to be delivered.

For clarity, it is agreed that Phase 3 of Project Breakspear, which includes a new bridge over the M1 to the north of J8, would not be required to be delivered during the lifetime of the plans (i.e. before 2041) and is included in a separate modelling exercise of up to 2050.

Once the phasing and delivery trigger points are presented to and agreed by National Highways, this will inform the scale of development/occupations that can be accommodated safely on the SRN and thus assist SADC and DBC in the financial timetable for providing the works. At this time, National Highways is unaware of specific income streams for the local authorities to deliver these works but can confirm that no funding from National Highways has been offered as part of their RIS program.

Q4 – Where mitigation is required, is it sufficiently clear to users of the Plan what is required, and where and when it will be delivered as required by policy?

National Highways considers that the Plan is sufficiently clear on the nature and location of the required mitigation, namely improvements at M1 Junction 8 through the phased Project Breakspear package. It is already established that Phases 1 and 2 must be delivered within the plan period, while Phase 3 is not required until after 2041.

Ongoing modelling work is being undertaken to refine the precise trigger points for delivery of Phases 1 and 2. This work is being progressed collaboratively by National Highways, and the two local authorities through the HGC Transport Group. On this basis, National Highways is confident that agreement on delivery triggers will be reached in a reasonable timeframe, ensuring that the Local Plan provides the necessary clarity on what mitigation is required, where, and when.

Q5 – What is the justification for the sensitivity testing which looks at a reduced number of jobs at East Hemel Hempstead (Central)? How does this correlate to the allocation in the St Albans Local Plan and the mix of uses proposed?

National Highways support sensitivity testing of alternative employment scenarios at East Hemel Hempstead to understand the range of potential transport impacts. Any reduction in employment floorspace assumptions should be reflected in revised trip generation and mitigation requirements, including the timing of triggers for delivery.

Q6 – What are the implications of the growth proposed at HGC on the local road network, having particular regard to the consequences of additional congestion and delays on the M1?

Responsibility for assessing the direct impacts of growth at HGC on the local road network rests with the local authorities. However, National Highways recognises that increased congestion on the local network could have knock-on effects on the SRN.

Notwithstanding this, the proposed IDPs and modelling results show an improvement in traffic flows within Hemel Hempstead as a result of the uptake of alternative modes of travel due to the increase in facilities provided by HGC and supporting Local Plan IDPs.

At M1 J8, the modelling shows that despite this modal shift, there will be an increase in traffic volumes associated with the full growth of HGC, resulting in additional delays compared to the baseline. Importantly, these delays do not result in queuing back to the M1 mainline. Once mitigation is in place, National Highways considers that while some congestion impacts will arise, they are not severe in NPPF terms and are acceptable when balanced against the wider sustainable travel benefits associated with HGC.

Q7 – In assessing the impacts of cumulative growth at HGC, how does the evidence take into account the likelihood of modal shift away from private car use? Has this been applied consistently and is it justified?

The implementation of the SADC and DBC IDPs show a notable modal shift away from the private car within HGC and Hemel Hempstead itself. Further work is underway to confirm the scale and timing of these mode share adjustments, including

how they will be supported by the phased delivery of sustainable transport infrastructure as HGC is built out. This work is being taken forward collaboratively through the HGC Transport Group.

At this stage, National Highways is not in a position to reach a final view on whether the proposed level of modal shift is fully justified. However, we are content that the assumptions have been applied consistently across the modelling work to date, and we will continue to engage with the local authorities as the evidence is refined.

Supplementary Information (added 17.10.25)

This supplementary statement updates the Examination regarding the National Highways position in relation to the combined St Albans and Dacorum Local Plan impacts on the strategic road network (SRN). For the purposes of the emerging St Albans Local Plan, we would be concerned with development patterns that have the potential to impact on the operation of the A1(M), M1, M25 specifically M25 J21, 21A, 22 and 23, although subject to the scale of impact, this may include other parts of the SRN positioned further afield.

As a statutory consultee to the Local Plan consultation, we are interested in the potential traffic impacts of any development site proposals and/or policies coming forward which may impact on the operation of our network and the need to ensure that any impacts are fully understood at the plan-making stage.

We have made recent representations in relation to the joint impacts through the Additional Documents Technical Consultation on 13 August 2025. Our representation stated that the strategic modelling undertaken to assess the joint impacts was by itself not sufficient to demonstrate that the resultant vehicular traffic from the combined Local Plans could be accommodated on the SRN. Further assessment work would be required.

We are now of the opinion that the strategic modelling using Hertfordshire's COMET model needs to be supplemented by detailed junction modelling where the strategic model is indicating potential road capacity issues. To this end, a microsimulation model was constructed and validated for the purposes of demonstrating the detailed impacts on the road network. This model and the modelling outcomes undertaken were described in detail as part of the above consultation.

This approach has been accepted by National Highways for the area covered by the microsimulation model. However, there are two gaps in this approach. Firstly, the microsimulation model in relation to the SRN does not geographically extend/cover all parts of the SRN potentially affected by the combined Plans. This is evident in the strategic modelling outcomes as witnessed in the above public consultation and our representation. The microsimulation model covers M1 Junction 8 but does not extend to Junction 9 nor does it cover any of the above M25 Junctions (21, 21A, 22 and 20). Additionally, the strategic modelling in the above consultation demonstrated potential impacts at M25 Junction 20 for the westbound slip road at the roundabout

where the flow increased significantly and the opposing circulating flow also increased compared to scenarios without the combined Plans.

Secondly, the modelling undertaken was inappropriate when assessing impacts at the motorway and trunk road merges and diverges. The combined Local Plan impacts at merges and diverges require assessment against national design standards (DMRB) as shown in document CD122 covering grade separated junctions.

In our representation of 13 August these points were raised, and we looked forward to ongoing consultation and cooperation on these outstanding matters for the combined Plans. Until these matters were completed, we were unable to properly comment on the consultation document covering the timing and trigger points for any required infrastructure improvements to accommodate the combined Local Plans.

Since 13 August we have seen additional evidence relating to the combined impacts upon M1 Junction 9 in relation to the northbound diverge. We requested further evidence in relation to 2041 forecast flows at the M1 Junctions 8 and 9 and M25 junctions 21 merges and diverges that was provided on 15 October 2025. We also requested further junction modelling based upon what the 2041 strategic model forecasts were indicating at M25 Junctions 20 and 22. Accordingly, additional modelling was undertaken and provided for M25 Junction 22 also on 15 October.

We have examined the merge and diverge flow information with regard to national design standards (DMRB CD122) and we are content that the traffic flows with the combined Local Plans provided at the specified merges and diverges for the period to 2041 do not appear to show any severe operational impacts over and above any impacts in the absence of the combined Plans. Additionally, the flow differences do not highlight any additional safety concerns requiring improvements to the network to accommodate additional traffic as a result of Local Plan growth.

The additional modelling at M25 Junction 22 for the combined Local Plan is showing that without the Plans the M25 eastbound off slip queues back from the roundabout presenting a safety concern. With the combined Local Plans this extends queues and delays on the slip road and main carriageway creating an additional unacceptable safety risk.

This additional safety risk has similarly been demonstrated through corresponding traffic modelling undertaken for the St Albans Local Plan in isolation and recognised in our Statement of Common Ground as requiring inclusion within a monitor and management strategy to be agreed with National Highways. We are similarly content for the strategy to cover combined Local Plan effects subject to a robust monitoring methodology and timely management plan to be implemented.

To date we have not been supplied with modelling at M25 Junction 22 other than in the strategic modelling subject to public consultation in July and August 2025. In the absence of more detailed evidence of combined Local Plan impacts, we propose that the junction also falls within the scope of the monitor and manage strategy. This will safeguard National Highways concerns given the lack of detailed information provided (other than additional flow and delay information on the M25 eastbound off

slip indicating that it is operating over capacity with the likelihood of additional queueing back) from the strategic model and lack of investigation with a more appropriate modelling tool.

End of Supplementary Submission

4. Conclusion

National Highways is committed to working collaboratively with both Local Councils, Hertfordshire County Council, and other stakeholders to ensure that the transport implications of HGC are fully understood and appropriately mitigated.

We recommend that:

- Local Plan policies explicitly reference the need for SRN mitigation, including (but not limited to) Junction 8 of the M1.
- Infrastructure delivery schedules are aligned with housing trajectories.
- Viability assessments incorporate the full cost of SRN interventions.
- Ongoing monitoring and review mechanisms are embedded into policy to respond to changes in travel demand and development phasing.

National Highways 17 October 2025