

St Albans City and District Council

Local Plan Public Examination

Matter 6

“The Broad Location for Development (Policy S6), General Matters (Policy S6) and Strategic Infrastructure Policies (L17 and L18)”

Submitted by Sellwood Planning

on behalf of

The Crown Estate

December 2019

1.0 Introduction

- 1.1 This Statement, relating to Matter 6 ‘The Broad Location for Development (Policy S6), General Matters (Policy S6) and Strategic Infrastructure Policies (L17 and L18)’ has been prepared by Sellwood Planning on behalf of The Crown Estate (TCE). TCE is the freeholder of the land necessary to deliver Broad Locations S6(i), (ii) and (iii) at East Hemel. TCE is also working cooperatively with the promoters of the North Hemel Hempstead Broad Location (S6(iv)).
- 1.2 Given the number of Questions and limited length of Statements, this Statement only responds to those Questions where TCE can assist the Inspectors.

2.0 (Q1) “How were the Broad Locations Selected”?

- 2.1 The potential for a strategic release of Green Belt land at East Hemel Hempstead and its ‘exceptional circumstances’ has long been recognised. This can be traced back to 2006 when the Panel’s report into the Examination of the Regional Spatial strategy for the South East was published. The Panel disagreed with the submitted plan and concluded that exceptional circumstances existed to warrant a major expansion of Hemel Hempstead.

“In our view this is an insufficient response to the challenges facing the region and the opportunities that expansion could present to the town, including repairing its image after the Buncefield fire various submissions give us confidence that there are enough options for Dacorum related housing growth of 12,000 (together with appropriate employment related and other development) to be achieved without breaching environmental limits in terms of landscape and other factors. While a strategic review of the Green Belt will be required we are confident that this can take place without compromising the broader purposes and integrity of the Green Belt. However, a significant proportion of the necessary urban extensions to Hemel Hempstead would probably have to be in

St Albans District, thus requiring close co-operation across the boundary and the development of a strong and effective delivery organisation” (para. 5.128).

- 2.2 In 2013, the Inspectors Report was published in relation to the Dacorum Local Plan. The role of East Hemel had been discussed during the Examination and the Inspector concluded

“A number of sites were considered for housing development, although it should be noted that this most recent assessment did not include any land outside the Borough boundary (eg. Land between the town and the M1 which is within St Albans City and District). However, an earlier assessment in 2009 did consider an eastern growth scenario and concluded that if significant expansion of Hemel Hempstead is required ‘this should be taken forward in the form of the eastern growth option’. This would require the co-operation of St Albans City and District Council but it is not a ‘new’ concept and it would appear that a significant assessment of this option has been undertaken in the past, upon which further consideration could be based” (para 57).

- 2.3 It was in this context of a broad acceptance that the principle of ‘exceptional circumstances’ existed at East Hemel for a Green Belt release that SADC and Dacorum Council commissioned SKM to undertake the Green Belt Review in 2013. It is noteworthy that the, now withdrawn, Strategic Local Plan (2016) had concluded that Exceptional Circumstances existed even with the lower housing provision (436 pa) proposed at the time. The extent of urban capacity / non Green Belt sites in 2019 is essentially unchanged from the position in 2014, when the SKM Review was undertaken, whilst the level of housing need has become more acute. This has led to the doubling of the housing provision to 913 homes per year in this Plan. This means that the demonstration of ‘exceptional circumstances’ is even more clearly apparent.

- 2.4 The TCE response on Matter 4 (Metropolitan Green Belt) explained that since the housing provision could not be met through urban capacity and non Green Belt sites, exceptional

circumstances existed to justify the release of Green Belt land. The SKM Green Belt Review assessed all Green Belt in SADC and identified which served least Green Belt purposes. This was the starting point in the identification of Broad Locations. The potential sites were then assessed in terms of planning suitability, sustainability, deliverability and the ability to secure significant public benefits. This is a sound and methodical approach as advocated by the NPPF and is supported by TCE.

3.0 (Q2) “What Assessments have been undertaken”?

- 3.1 It is for the Council to explain the work it has undertaken. However, the TCE consultant Team has also undertaken a full suite of assessments including a sustainable transport assessment, traffic modelling, landscape, noise, archaeology / heritage, drainage, ground conditions and ecology. These assessments found no matters which could not be resolved with appropriate mitigation. These studies have now formed the basis of an EIA which will support the East Hemel application when it is submitted in May 2020. These studies can be made available to the Inspectors, if required.

4.0 (Q3) “Is the Sustainability Appraisal (SA) robust”?

- 4.1 Whilst it is for the Council to defend its SA, the TCE Team has reviewed the submitted SA and consider it to be a robust and proportionate document which considers all reasonable options for meeting the housing and employment needs of the area in a sustainable manner.

5.0 (Q4) “Are the Broad Locations clearly identified on the Policies Map”?

- 5.1 No, the submitted Policies Maps are very poor and unclear. The Plan should be modified to provide clearer maps for each Broad Location.

6.0 (Q5) “What is the timescale for masterplan preparation, is this alongside the Local Plan”?

- 6.1 TCE has been in detailed discussions with the Council regarding a masterplan for Broad Locations S6(i), (ii) and (iii) since 2017. These discussions started in November 2018 and have gathered pace since the signing of a PPA in August 2019. This PPA focusses on a planning application for the whole of S6(i) and S6(ii) and the northern part of S6(iii) – a total of around 3,000 homes and 55 ha of employment land. This application also includes the J8 upgrade and the A414 / Breakspear improvement. The PPA provides for the masterplan process to be ‘agreed’ by SADC Members in early 2020, followed by the submission of the application in May 2020. The original intention had been to submit in March 2020 but this has been delayed by the General Election and this Local Plan Examination. TCE is confident that this programme can be met.

7.0 (Q6) “Should North and East Hemel Hempstead be one Broad Location”?

- 7.1 Although TCE made a ‘duly made’ representation at Reg. 19 stage seeking the amalgamation of S6(i), (ii) and (iii), TCE now wishes to withdraw this objection. Further joint masterplanning work over the last year between TCE and SADC / DBC has demonstrated that all parties are committed to these three Broad Locations being developed in a comprehensive manner. This includes both masterplanning and the provision of strategic infrastructure.

8.0 (Q7) “Has the Council considered the advice in para 72(a) to (d) of the NPPF”?

- 8.1 Whilst it is for the Council to answer this, it is relevant that the Council, Dacorum Council, HCC, the Hertfordshire LEP and TCE jointly made a successful bid to MHCLG for Hemel Garden Community to be given the formal status of a ‘Garden Community’ which was widely supported. Masterplanning work on HGC is now underway. This provides clear evidence that the guidance in paragraph 72 has been

considered and is being followed in terms of realising the potential for a new community led by Garden Community principles.

9.0 (Q8) “What Strategic Infrastructure is necessary to implement the Plan”?

- 9.1 As a Plan wide question, this is for the Council to answer. Details concerning S6(i), (ii) and (iii) are provided in the answer to Q9 below and in the relevant sections of Matter 7.

10.0 (Q9) “Infrastructure Requirements for Broad Locations”?

- 10.1 TCE has been working closely with the relevant transport authorities (primarily HCC and Highways England) to develop a comprehensive Sustainable Transport Strategy for the East Hemel Broad Locations, which builds on the work done within the Maylands Growth Corridor Study. TCE has prepared its own ‘East Hemel IDP’ for the three Broad Locations and this forms *Appendix 1*. This is ‘work in progress’ and will evolve prior to the start of the Examination. In addition to providing strategic infrastructure directly related to these Broad Locations, TCE is also able to provide land and contributions to assist with plan wide infrastructure such as the improvement to Junction 8 of the M1 including the new link road from S6(ii) over the M1 into Junction 8. These important pieces of infrastructure have also been designed so they are ‘future proofed’ to accommodate HGC.

11.0 (Q10) “Are there any infrastructure requirements missing”?

- 11.1 TCE is not aware of any infrastructure element missing from the Councils IDP. TCE has focused on the delivery of S6(i), (ii) and (iii) and is confident that its draft IDP (*Appendix 1*) includes all foreseeable infrastructure requirements.

12.0 (Q11) “Any known Sources of Funding, are they in the Council’s IDP”?

12.1 The Council will respond on the Plan as a whole. However, in terms of S6(i), (ii) and (iii), sources of funding are

- (a) TCE will fully fund the transport infrastructure directly required by their proposed development. This includes a spine road through the residential and commercial areas as well as a comprehensive improvement of the A414 / Green Lane junction
- (b) TCE will fund the Sustainable Transport Strategy that supports its development including on-site pedestrian and cycling improvements; appropriate bus service pump priming (etc.)
- (c) TCE will make appropriate and CIL Regulation 122 compliant contributions to off-site infrastructure such as walking and cycling improvements, junction improvements (etc.). It is expected that other sites within the currently adopted DBC Local Plan and within the draft SADC Local Plan will also contribute to these improvements
- (d) In addition to the above, TCE and the Hertfordshire LEP (‘Herts IQ’) are jointly funding the £6m costs of detailed design work on a package of highway works comprising the following
 - A414 / Breakspear Junction upgrade
 - Commercial Spine Road
 - Upgrading of J8 of M1
- (e) The ‘forward funding’ of this work (ahead of when it would normally be undertaken ie. post planning consent) will accelerate the date when construction works can start which in turn will bring forward the date when commercial and residential development can be delivered. TCE controls all the land to deliver these improvements
- (f) All infrastructure directly required by the 6 (i), (ii), and (iii) will be fully funded by TCE
- (g) The upgrading of J8 of M1 is not required within the first 5 years of the Local Plan.
A number of sources of funding are available for the scheme as follows

- S106 Contributions from schemes within the adopted DBC Local Plan
- S106 Contributions from schemes within the draft SADC Local Plan, including Broad Locations S6(i), (ii) and (iii)
- S106 Contributions from other schemes within the emerging Hemel Garden Communities project
- Enterprise Zone funding (through retained Business Rates)
- Road Investment Strategy (RIS2). An initial submission supporting this was made by HCC in 2018
- ‘Herts IQ’ with the agreement of the LEP has formally resolved that it will underwrite the costs of J8, in the event of a funding shortfall. In essence, it is the ‘funder of last resort’

(h) TCE will provide land and funding for social and physical infrastructure within S6(i), (ii) and (iii), where it is fully related to these Broad Locations.

12.2 Therefore, a range of funding opportunities exist. It should also be noted that the wider ‘Garden Community’ status of HGC also gives the whole development elevated priority for funding.

13.0 (Q12) “Will Infrastructure be delivered within necessary timescales”?

13.1 Whilst this is primarily for the Council to answer, the progression of the East Hemel masterplan and preparation of the planning application plus the agreement to forward fund design work on the improvements on J8 of the M1 provides confidence that TCE takes its responsibilities seriously to facilitate infrastructure in a timely manner. As set out in the answer to Question 11, all the infrastructure directly required to deliver S6 (i), (ii) and (iii) is within Highway Authority land or TCE ownership and will be fully funded by TCE. TCE has programmed the transport and other infrastructure to allow development to proceed in accordance with the Local Plan trajectory. Furthermore, TCE will make appropriate contributions to wider plan-led infrastructure improvements.

14.0 (Q13) “Should S6 specify provision and timing of infrastructure”?

- 14.1 Policy S6 should limit itself to high level commitments in terms of essential infrastructure. Detailed timings for the provision of specific pieces of infrastructure are generally not available at the plan making stage and are better left to the detailed stages of masterplanning, application preparation and S106 negotiations.

15.0 (Q14) “Cross boundary infrastructure provision”?

- 15.1 This is dealt with below as part of Q15.

16.0 (Q15) “How are cross boundary transport impacts managed”?

- 16.1 TCE is only able to respond to this question in terms of its involvement in S6(i), (ii) and (iii) and the HGC discussions. Given the location of these Broad Locations close to the SADC/DBC boundary, they do have cross boundary transport implications that have been fully assessed. HCC, as local transport authority, and Highways England, as strategic highways authority, cover both SADC and DBC and are therefore able to consider matters holistically.
- 16.2 Since 2015 TCE has worked jointly with SADC, DBC, HCC, the LEP and Highways England on transport improvements in the Maylands area which included devising and testing a comprehensive package of cross-boundary transport improvements. These have been tested using transport models that cover the required study area within both SADC and DBC.
- 16.3 Since the Government announcement of the success of Hemel Garden Communities bid in March 2019, an HGC Board, Steering Group and sub Groups (including Transport Sub-Group) have been established to guide the form of HGC. This includes

looking comprehensively at transport impacts and solutions across the whole HGC area of influence. These existing mechanisms demonstrate that the cross boundary transport implications of the Broad Locations are being addressed.

17.0 (Q16) “Is any strategic infrastructure reliant on neighbouring authorities”?

- 17.1 TCE can only provide a response on this in terms of S6(i), (ii) and (iii). It is for the Council to respond in relation to the rest of the Plan area. The TCE sites are not reliant on infrastructure provided by development in a neighbouring local authority. Importantly, both the Breakspear/ A414 improvement and the upgrade to M1 J8 can be delivered on land which is either TCE owned or Highway land and is within St Albans District.

18.0 (Q17) “Will the delivery of key infrastructure support the trajectory”?

- 18.1 Traffic modelling indicates that the Breakspear / A414 junction improvement needs to be in place to allow the delivery of S6(i), (ii) and (iii). The same modelling indicates that the upgrade of M1 Junction 8 is not required for the delivery of the TCE sites but is likely to be required in the latter part of the Plan period to accommodate plan wide growth. It is for this reason that TCE is jointly funding J8 design work with the LEP, will be providing the land and will make a proportionate contribution to its cost. This will ensure that all the key infrastructure necessary to deliver Broad Locations S6(i), (ii) and (iii) can be provided in a logical and timely manner which will also facilitate the achievement of the Local Plan trajectory.

19.0 (Q18) “Are there constraints on the delivery of strategic infrastructure”?

- 19.1 As noted above, all the land to deliver the required infrastructure including Breakspear / A414 and the M1 Junction 8 improvement is either Highway Authority land or land

owned by TCE. The TCE IDP for its Broad Locations forms *Appendix 1*. This demonstrates that there are no anticipated constraints which would impede the provision of new infrastructure to serve the new community.

20.0 (Q19) “Park Street Garden Village”?

20.1 No comment.

21.0 (Q20) “Has the viability of each of the Broad Locations been adequately demonstrated”?

21.1 The 2017 SADC CIL and Viability Report (INFRA 009) has now been superseded by the 2019 Report prepared by BNP Paribas. Since this provides more up to date information, it resolves some of the Inspectors concerns about robustness.

21.2 Savills (TCE’s viability consultant) has reviewed the 2019 viability report. Savills have two significant concerns about the report plus a number of detailed comments. A brief summary of these concerns forms *Appendix 2* along with comments on points (a) to (k) of Q20. However, in essence, the main issues are.

(a) why has the Viability Study been based on a housing mix which is neither the one in Appendix 6 of the submitted Local Plan nor the one proposed in the, as yet unpublished, 2019 South West Herts SHMAA?

(b) the report assumes a residential sales value per foot for the East and North Hemel Broad Locations which is based on values realised generally in the villages and rural area of St Albans east of the M1. However, the East and North Hemel sites are west of the M1 and adjoin the urban area of Hemel Hempstead. As such, it will function as part of the Hemel Hempstead market area and take values from Hemel Hempstead rather than St Albans. This is a serious issue since the 2019 Viability Report assumes a sales value of £530 per ft² for S6(i), (ii) and (iii) whereas market

evidence is that even with a ‘Garden Community’ premium, the realisable value is around £430 per ft². Savills has re-run the viability assessment using its preferred mix and a sales value of £430 per ft². Whilst this erodes the viability position of S6(i), (ii) and (iii), the conclusion is that they remain viable. The TCE response to Q7 of Matter 3 sets out why the Savills mix should replace the one in Appendix 6 of the submitted Plan.

Appendix 1

Proposed Draft IDP (work in progress)

Draft Infrastructure Delivery Plan (IDP)

East Hemel Hempstead Planning Application
December 2019



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Note: This is a draft IDP – shared in advance of the planning application submission being made on Land East of Hemel Hempstead to support evidence submitted with the Local Plan Examination Statements.

1. Introduction

1.1. Purpose

1.1.1. **Note: This is a draft IDP – shared in advance of the planning application submission being made on Land East of Hemel Hempstead to support evidence submitted with the Local Plan Examination Statements.**

1.1.2. The purpose of this draft Infrastructure Delivery Plan (IDP) is to highlight analysis and conclusions that ensure that The Crown Estate's (TCE) East Hemel Hempstead (EHH) planning application (the 'Proposal') provides infrastructure which meets the needs arising from the new residential population, the commercial premises and visitors to the scheme. It is also intended to demonstrate the delivery of EHH can be secured in a manner which does not prejudice, and where possible, actively facilitates the longer term delivery of the remainder of emerging Policies S6 (i-iii) and wider Hemel Garden Communities (HGC), noting that the Dacorum Borough Council element presently has no planning status. The wider HGC includes the remaining land not within the Proposal but that is part of emerging Policy S6 (i – iii) (the 'Allocation').

1.1.3. The draft IDP acknowledges there will be a subsequent planning application which builds out the remainder of the Allocation not included in the planning application. The infrastructure required for the subsequent application is also considered, albeit in less detail. The draft IDP provides a logical sequence for infrastructure delivery. The draft IDP is presently in draft form, and hence some aspects are to be determined (TBD) or included within square brackets [...].

1.2. Method

1.2.1. The draft IDP summarises the results of infrastructure need assessments that have been undertaken on a range of categories for the determination of appropriate amounts of provision. The generic approach for the assessment of the appropriate amount of infrastructure is to calculate the need arising for that infrastructure based on the number of residents, workers and visitors at the development Proposal / Allocation.

1.2.2. The overarching policy guidance used to ensure the appropriate level of infrastructure provision is the tests in Community Infrastructure Levy (CIL) Regulation 122. (We summarise the tests and their relevance in Chapter 4.) In the instances where our assessments conclude that the emerging planning policies do not meet the requirements of the CIL tests, the proposed infrastructure may not follow the specifics of that policy.

1.2.3. In addition to guidance from the CIL tests, the infrastructure assessments used the relevant national guidance and/or appropriate benchmarks to determine the appropriate level of infrastructure provision in the development Proposal. It has also included reviews of the current and future delivery model for infrastructure in the relevant geography; estimation of the need for infrastructure arising from the development Proposal; review of the capacity of the existing infrastructure to meet the needs arising from the development proposal; and a calculation of the net needs arising having taken in to account existing infrastructure.

1.2.4. In addition to CIL and other relevant guidance, the level of infrastructure in the proposed development is dependent upon the scheme being able to afford it in viability terms. If the scheme is unable to meet the infrastructure needs arising then there could be scope for the planning obligations to be reduced through discussions with the local authorities. Otherwise there is a risk that the Proposal / Allocation and its contingent benefits will not come forward.

1.2.5. The IDP includes some details on costs taken from SADC's own IDP. These figures are high level and in some instances the cost figures are applied to infrastructure categories and not to specific projects. Therefore the figures should be viewed with caution as there is a high likelihood they will change. TCE has undertaken its own costs analysis to inform the Proposal, and this work will influence the approach to the planning application.

1.2.6. The IDP also includes a list of specific infrastructure projects and their corresponding trigger points for delivery. It also shows in graphical form how the infrastructure projects are temporally aligned with the proposed housing trajectory. This is a draft and emerging list, and will inform the planning application and approach to the Section 106 heads of terms.

1.3. **Structure and Infrastructure Categories Covered in the IDP**

1.3.1. The structure of the IDP is as follows:

- Chapter 2 - Site description
- Chapter 3 - Development Proposal
- Chapter 4 - Planning policy context
- Chapter 5 - Infrastructure categories
- Chapter 6 - S106 Infrastructure List
- Chapter 7 - Overall infrastructure phasing

1.3.2. In Chapter 5 the different infrastructure categories are arranged into separate sections and present the following elements:

- What would be delivered and how will the different elements relate the three areas of the subject site (North, Central and South)
- How the proposed infrastructure will meet the needs arising from the development Proposal and does not prejudice the delivery of the rest of the Allocation and HGC
- Phasing of delivery
- Cost and funding mechanisms; and
- Key delivery stakeholders.

1.3.3. The IDP covers the following categories:

- Transport infrastructure
- Education (early years, primary and secondary)
- Police services
- Green Infrastructure/open space
- GP and dental surgeries
- Libraries
- Community facilities
- Water/sustainable urban drainage systems (SUDS)
- Stewardship
- Renewable energy
- Waste & Recycling
- Utilities
- Fire Hydrants
- Digital infrastructure.

2. Site Description

2.1. Introduction

- 2.1.1. The application site for the Proposal is around 343 hectares. The majority of the site is situated to the east of Hemel Hempstead and bounded to the west by the M1 motorway. There is also an area of land to the east of the M1 around Junction 8 which enables junction improvements.
- 2.1.2. The Proposal site is comprised of most of the Allocation in the St Albans City & District Council's (SADC) emerging Local Plan 2020-2036. Policies S6 i, ii and iii – Broad Locations for Development allocate land which encompasses the Proposal. The Proposal seeks to develop most but not all of the Allocation.

2.2. Site Components

- 2.2.1. The Proposal site is broadly formed of four areas of land:
- Land to the south of Redbourn Road (B487) and north of Punchbowl Lane (EHH North);
 - Land to the south of Punchbowl Lane and north of the A414 Breakspear Way (EHH Central);
 - Part of the land to the south of the A414 Breakspear Way and north of the A4147 (EHH South); and
 - Land to the east of Junction 8 of the M1.
- 2.2.2. **Figures 2.1 / 2.2** presents the different components of the Proposal site, the rest of the Allocation and the entire HGC (including the prior mentioned elements). There are some smaller elements of Allocation Policy S6 (i-iii) within the red line areas of the Proposal, which will form part of a Strategic Spatial Masterplan for the whole Allocation. Assumptions over the additional infrastructure provision to enable these areas to come forward has been made in this IDP.

Figure 2.1 Redline Boundary of the Proposal and HGC (Including Rest Of Allocation)

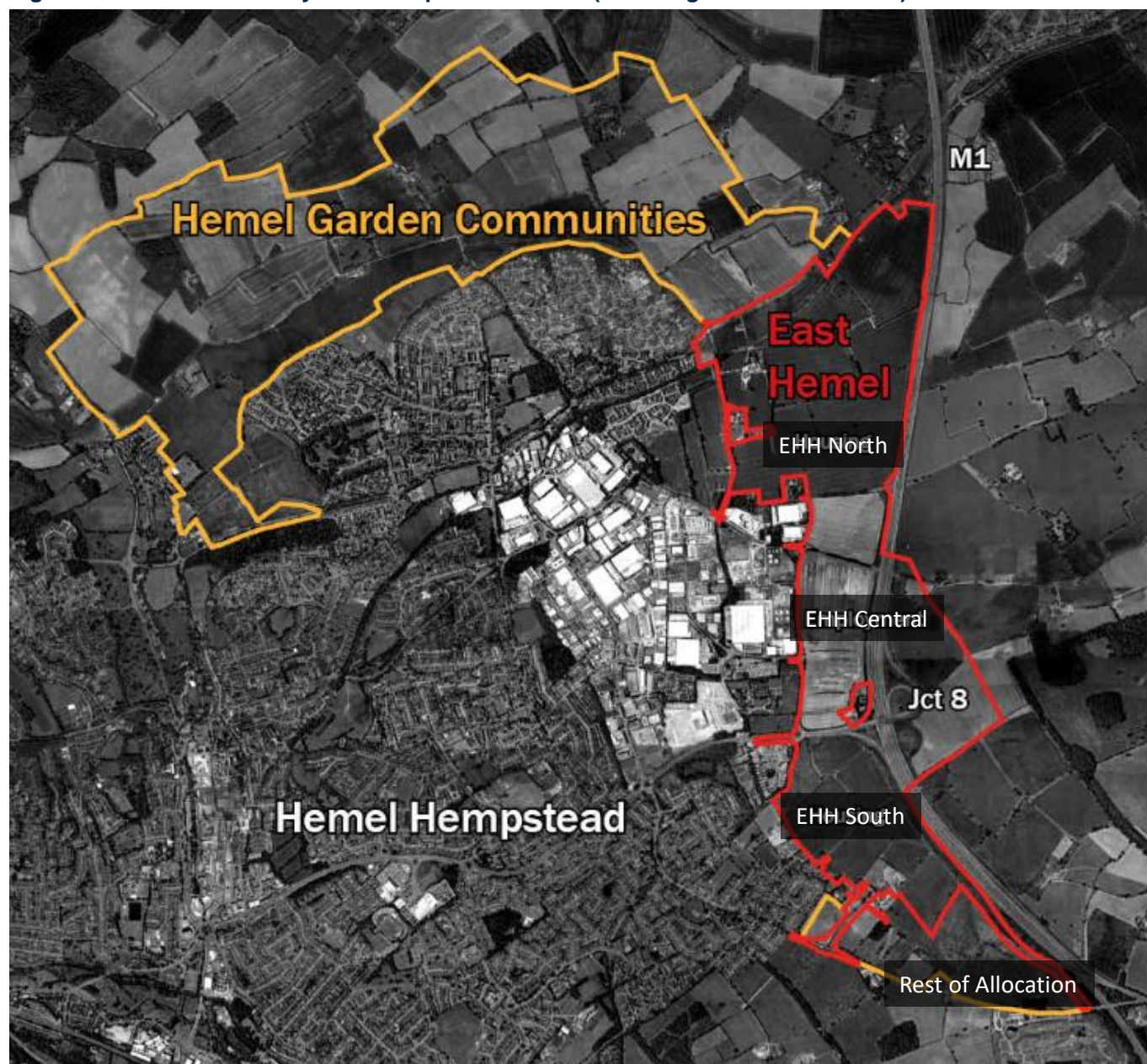
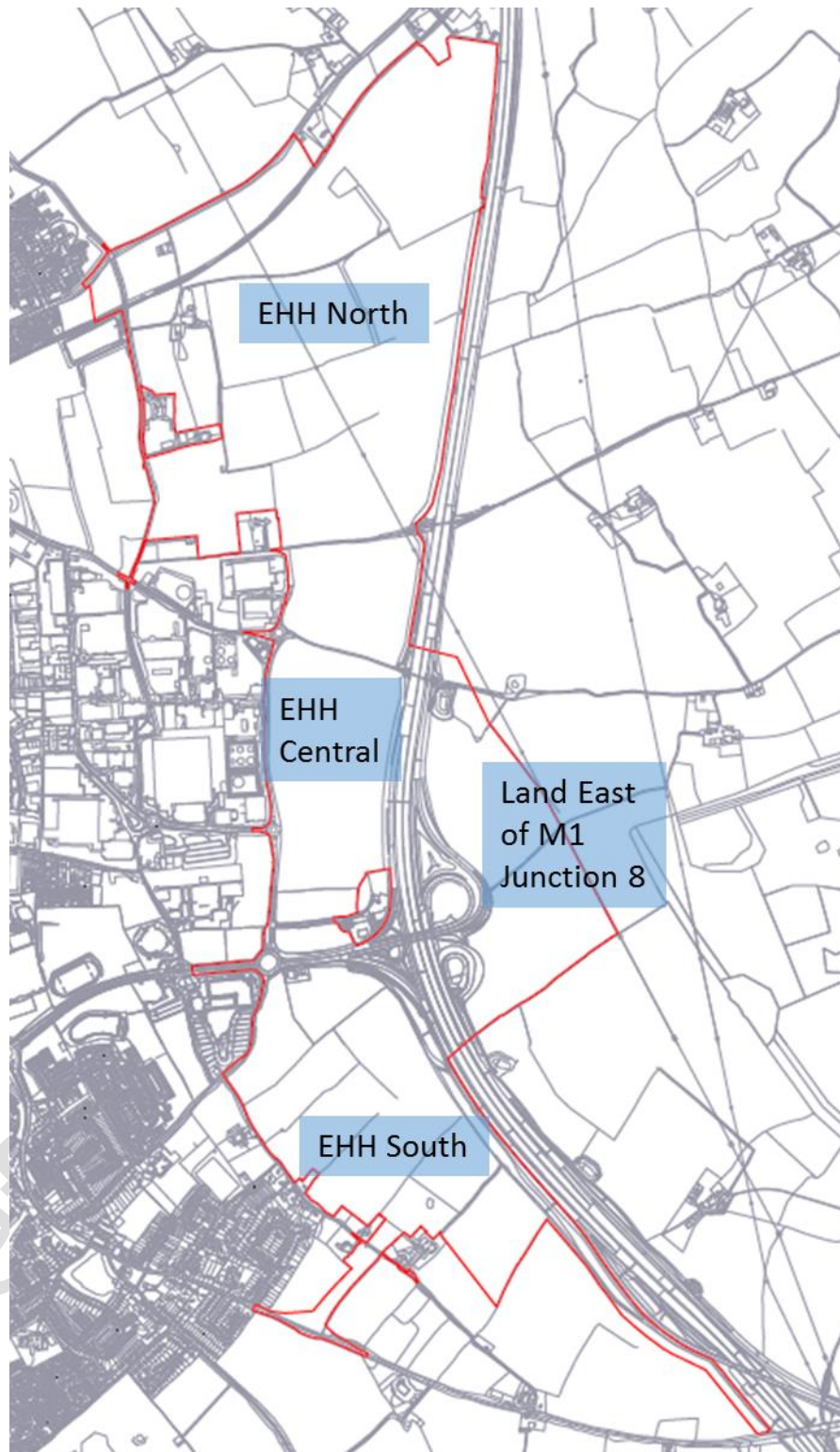


Figure 2.2 Redline Boundary of the Proposal



Source: Scott Brownrigg (2019)

2.3. **EHH North**

- 2.3.1. EHH North site is proposed as primarily residential use. It is defined by Redbourn Road to the north (B487), the M1 to the east, Punchbowl Lane to the south and Cherry Tree Lane to the west. It is currently agricultural land and is adjacent to the existing residential development of Hemel Hempstead on its western boundary.

2.4. **EHH Central**

- 2.4.1. EHH Central is proposed to be primarily commercial. It is bounded by Punchbowl Lane to the north, the M1 to the east, Breakspear Way to the south, and Green Lane to the west. It is currently used as agricultural land. It is adjacent to Maylands, the large commercial area.

2.5. **EHH South**

- 2.5.1. EHH South is also proposed primarily for residential use. It is bounded by Breakspear Way to the north, the M1 to the east and Westwick Row to the west. The most significant boundary to the south is the A4147 although the redline boundary only partially comprised of the road. The land is also currently utilised as a mixture of grazing and arable farmland. It is adjacent to the existing residential development of Hemel Hempstead.

2.6. **Land East of M1 Junction 8**

- 2.6.1. This portion of the site is primarily in agricultural use. The boundary is defined by existing hedgerow and field boundaries. No commercial or residential development is planned. The proposed development will be for junction improvements in relation to the development of the sites to the west of the M1. It will also include balancing ponds for surface water and strategic landscaping.

3. Development Proposal

3.1. Introduction

- 3.1.1. The development Proposal comprises a mixed-use urban extension to the east of the existing settlement boundary of Hemel Hempstead and primarily to the west of the M1 motorway. There are associated road improvements at Junction 8 of the M1 motorway which extend to the east side of the motorway.

3.2. Outline Planning Application

- 3.2.1. The Proposals are for an outline planning application with the majority of the matters reserved except for access into the site and some highways, including Junction 8, Brakespear junction and part of the proposed primary route and also a noise bund. The application is therefore 'Hybrid'; the detail of the Proposal is explained in the separate Planning Statement (which will be submitted with the planning application).

- 3.2.2. The development includes a variety of uses, the key elements of which are listed below. For the infrastructure elements greater detail is provided in subsequent chapters of the draft IDP.

- [Up to 3,100 new dwellings] including accommodation for elderly residents and for gypsy and travellers
- Offices, warehousing and other employment premises
- Commercial uses includes retail within the local centres of the residential areas
- Primary and secondary schools
- GP surgeries and other health provision
- Library
- Assembly and leisure uses
- Landscaping, public realm, public open space including a country park
- Ancillary car parking
- Public transport infrastructure
- Related infrastructure and services including utilities, drainage and flood attenuation, telecommunications and renewable energy
- Recycling facilities
- Gypsy and traveller pitch sites, and
- Improvements to Junction 8 of the M1.

- 3.2.3. The two proposed residential areas (Northern Site and Southern Site) are separated by the commercial area in the centre of the site (Central Site). The residential element areas accommodate approximately [up to 3,100 new units].

- 3.2.4. The development Proposal corresponds with policies S6 i, ii and iii – Broad Locations for Development in SADC's emerging Local Plan. The development Proposal seeks to develop most but not all of the land and dwellings in the policies.

- 3.2.5. As part of the residential scheme on the Northern Site a new primary and a new secondary school are proposed. The proposals on the Southern Site would also include a new primary school.

- 3.2.6. Local centres are to be provided within both residential areas. The local centres will be centrally located on the respective proposed spine roads through the settlements. Provision will also be made within the application to allow for the development of health and community facilities.

- 3.2.7. Key employment uses will be located in the Central Site. This is proposed to include total floorspace of

[circa] 160,000 sqm (1.7 m sqft) to be comprised of approximately:

- Office (B1a) – [circa] 40,000 sqm (430,000 sqft)
- Light Industrial/General Industry (B1c and B2) – [circa] 36,000 sqm (390,000 sqft)
- Warehouse/Logistics (B8) – [circa] 85,000 sqm (910,000 sqm)

3.2.8. Open space is a key element of the development Proposal. Formal sport and open play facilities are proposed to include playing fields, NEAPs (Neighbourhood Equipped Area for Play), LEAPs (Local Equipped Area for Play) and LAPs (Local Area for Play). A district park is also proposed. Details of the open space proposed for the residential areas is can be found in Chapter 5.

4. Planning Policy Context

4.1. Introduction

- 4.1.1. This Chapter sets out the relevant national and local policy guidance and policy framework that has informed this draft IDP.

4.2. National Guidance

- 4.2.1. Two key documents that are part of the national framework for planning obligations for education are the Community Infrastructure Levy (CIL) Regulations and the Department for Education's (DfE) 'Securing Developer Contributions for Education' report (April 2009).

CIL Regulations

- 4.2.2. The overarching policy guidance used to ensure the appropriate level of infrastructure provision is the tests in Community Infrastructure Levy (CIL) Regulation 122. It provides three tests which limit the use of planning obligations for the mitigation of the impacts of a development proposal. The tests for the use of a planning obligation are that they are:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development.

- 4.2.3. In the instances where our infrastructure needs assessment concludes SADC's emerging Local Plan policies is inconsistent with the CIL tests we have not always proposed to follow the specifics of the emerging Local Plan. Also, meeting the needs arising from a development proposal is dependent on the scheme being able to afford the policy requirements in viability terms.

Other National Guidance

- 4.2.4. Whilst the CIL Regulations provide a high level framework for assessing all infrastructure categories, the IDP has also relied on category-specific guidance and benchmarks when available. For example, the assessment of school provision has used '*Securing Developer Contributions For Education*' (April 2019) produced by the Department for Education. In other instances we have the Department for Transport's '*Manual for Streets*' (2007) to create relevant catchment areas for services such as GP surgeries.

4.3. Hertfordshire County Council (HCC) and Other Sub-Regional Bodies

- 4.3.1. Several sub-regional bodies have produced guidance and research or act as consultative bodies for the proposed development. HCC produced guidance and research relevant to the provision of infrastructure in Hertfordshire County relevant to health, education, transport, libraries and other categories. The key planning obligations document produced by HCC is the draft '*Guide to Developer infrastructure Contributions*' (2019). Other relevant sub-regional bodies include the Hertfordshire Local Enterprise Partnership (LEP), the Herts Valley Clinical Commissioning Group (for the provision of health-related infrastructure) and the Hertfordshire Constabulary (for police services).

4.4. Local Planning Policy

- 4.4.1. The EHH planning application site is nearly entirely situated within St Albans District Council (SADC) and is therefore nearly entirely adjacent to the boundary between SADC and Dacorum Borough Council (DBC).

A small proportion of the application area is within DBC. Both planning policy frameworks have relevance insofar as the relevant matters for determination within the relevant Authorities. In this chapter the details of the SADC emerging policies are highlighted. The detailed analysis of the relevant national and local planning policy is within the separate Planning Statement.

- 4.4.2. SADC's current Local Plan is The District Local Plan Review 1994. In October 2018 SADC published its Local Plan 2020-2036 Publication Draft (2018). Relevant details of the document are highlighted in this chapter. Hearing dates for the Examination in Public are to commence in January and February 2020.
- 4.4.3. SADC has also published the 2018/2019 Infrastructure Delivery Plan which covers infrastructure intended for delivery over the emerging Local Plan period to 2036. Relevant details from the SADC IDP are summarised below.
- 4.4.4. DBC's current Local Plan is the Local Plan Core Strategy (2006-2031) which was adopted in 2013. It sits alongside the Local Plan 1991-2011 which was adopted in 2004. DBC is working on a new Local Plan to 2036. In November 2017 it published the Issues and Options Consultation Local Plan to 2036.
- 4.4.5. In 2018 Dacorum and SADC, along with Three Rivers and Watford Councils, endorsed work on a Joint Strategic Plan for South West Hertfordshire. Whilst all the councils will be responsible for preparing their own Local Plan, the JSP will provide a framework for considering the challenges of economic growth over the wider area.

SADC Local Plan 2020-2036 Publication Draft (2018)

- 4.4.6. Emerging Policy S6 – Broad Locations for Development identifies several areas includes three geographic areas which closely correspond with the three key development areas within the development proposal. They are identified as:
- Policy S6 i) East Hemel Hempstead (North) Broad Location
 - Policy S6 ii) – East Hemel Hempstead (Central) Broad Location, and
 - Policy S6 iii) – East Hemel Hempstead (South) Broad Location.
- 4.4.7. The emerging policies include infrastructure requirements for the three areas. The relevant infrastructure requirements are in bold.

Policy S6 i) East Hemel Hempstead (North) Broad Location:

- 1) *Masterplanned development led by the Council in collaboration with Dacorum Borough Council, local communities, landowners and other stakeholders*
- 2) *Minimum capacity 1,650 dwellings*
- 3) *The 1,650 dwelling figure above includes at least one 50+ bed C2 Residential or Nursing care home, at least one 50+ home C3 Flexi-care scheme and 12 units to provide special needs accommodation, in accordance with Policy L2*
- 4) *Minimum 40% Affordable Housing in accordance with Policy L3*
- 5) *Minimum overall net density 40 dwellings per hectare*
- 6) *Housing size, type and mix as set out in Policy L1 and Appendix 6*
- 7) **Strategic and local public open space, including managed woodland and ecological network links**
- 8) **Countryside access links including improved off-road paths (rights of way) and links to a community food zone retained in the Green Belt**
- 9) **A substantial new Country Park providing facilities for new and existing communities and a permanent green buffer to Redbourn**

- 10) Retention of important trees and landscape features
- 11) **3FE primary school, including Early Years provision, to serve the new community**
- 12) **An 8FE secondary school to serve the new and existing communities**
- 13) **Transport network (including walking and cycling links) and public transport services upgrades/improvements**
- 14) 3% of homes provided to be self-build housing
- 15) New neighbourhood and local centres, including commercial development opportunities
- 16) **Recreation space and other community facilities, including health provision**
- 17) **Community Management Organisation with sufficient assets to provide sustainable management of community facilities, open spaces and parklands**
- 18) Excellence in design, energy efficiency and water management
- 19) Appropriate renewable energy production and supply mechanisms
- 20) Appropriate buffer zones and mitigations to address the Buncefield oil depot and pipelines
- 21) Design to mitigate adverse impacts from motorway noise and air pollution.

Policy S6 ii) – East Hemel Hempstead (Central) Broad Location:

- 1) Masterplanned development led by the Council in collaboration with Dacorum Borough Council, local communities, landowners and other stakeholders
- 2) Accordance with the aims and status of the Hertfordshire Enviro-Tech Enterprise Zone to deliver both Enviro-Tech Businesses and environmentally friendly buildings
- 3) Employment provision for a range of uses including: offices, research and development, light industrial and logistics; within the approximately 55 Ha area north of Breakspear Way and south of Punchbowl Lane
- 4) A significant new Business Park consisting primarily of B1 office accommodation on the southern approximately 17 Hectares of the site
- 5) A significant new logistics and mixed industrial area on the northern approximately 38 Hectares of the site
- 6) Sufficient variety of employment uses must be provided over time to offer in the order of 10,000 jobs. Over-concentration of low employment generating logistics uses will not be permitted
- 7) The first phase of employment development will be required to provide some starter units/incubator space
- 8) Retention of important trees and landscape features
- 9) **A new link road from M1 junction 8 to the Green Lane/Boundary Way roundabout**
- 10) **Multi-Modal Transport Interchange with facilities to encourage and facilitate modes of transport other than the private car**
- 11) Use of the exceptional environmental opportunities provided by this scale of employment development including Combined Heat & Power and large scale solar power generation
- 12) One 15 pitch Gypsy and Traveller site
- 13) Full exploration of possibilities for an offsite construction facility (primarily for modular housing) within the logistics and mixed industrial area
- 14) Appropriate buffer zones and mitigations to address the Buncefield oil depot and pipelines
- 15) Design to mitigate adverse impacts from motorway noise and air pollution.

Policy S6 iii) – East Hemel Hempstead (South) Broad Location

- 1) Masterplanned development led by the Council in collaboration with Dacorum Borough Council, local communities, landowners and other stakeholders
- 2) Minimum capacity 2,400 dwellings

- 3) *The 2,400 dwelling figure above includes at least one 50+ bed C2 Residential or Nursing care home, at least one 50+ home C3 Flexi-care scheme and 12 units to provide special needs accommodation, in accordance with Policy L2*
- 4) *A positive relationship with Leverstock Green and the wider existing neighbourhood structure of Hemel Hempstead*
- 5) *Minimum 40% Affordable Housing in accordance with Policy L3*
- 6) *Minimum overall net density 40 dwellings per hectare*
- 7) *Housing size, type and mix as set out in Policy L1 and Appendix 6*
- 8) **Strategic and local public open space, including managed woodland and ecological network links**
- 9) **Countryside access links including improved off-road paths (rights of way) and links to a community food zone retained in the Green Belt**
- 10) **A substantial new Country Park providing facilities for new and existing communities and a permanent green buffer to the south east**
- 11) *Retention of important trees and landscape features*
- 12) **One new 3FE and one new 2FE primary schools, including Early Years provision, to serve the new community**
- 13) **Transport network (including walking and cycling links) and public transport services upgrades/improvements**
- 14) *3% of homes provided to be self-build housing*
- 15) *New neighbourhood and local centres, including commercial development opportunities; which provide support for, rather than competition with, existing Leverstock Green facilities.*
- 16) **Recreation space and other community facilities, including health provision**
- 17) **Community Management Organisation with sufficient assets to provide sustainable management of community facilities, open spaces and parklands**
- 18) *One 15 pitch Gypsy and Traveller site*
- 19) *Excellence in design, energy efficiency and water management*
- 20) *Appropriate renewable energy production and supply mechanisms*
- 21) *Design to mitigate adverse impacts from motorway noise and air pollution.*

4.4.8. The SADC IDP sets out the infrastructure which the council has determined is required to support the development proposed in the emerging Local Plan. It also sets out, where possible, its estimate of the cost of the infrastructure. In addition it details a breakdown of infrastructure per site and the anticipated funding source and delivery stakeholder(s). **Table 3.1** summarises SADC IDP Infrastructure Delivery Schedule (IDS) relevant to the development proposal. Libraries are not included in the table.

Table 4.1 SADC IDP IDS Relevant to the Development Proposal [UPDATE WITH ANY REVISED IDP AT THE SADC LOCAL PLAN EXAMINATION]

	East Hemel Hempstead (North) Broad Location	East Hemel Hempstead (South) Broad Location	Funding Source(s): landowner/ developer (D)/S106 &/or CIL (S&C)/Other (O)	Key delivery stakeholder(s): landowner/ developer (D); LA; HCC; Other (O)	Estimated Total Cost	Est delivery phase by yr 5/by yr 10/by yr 15
Transport Infrastructure:						
Strategic – LTP4 Major Scheme	Y	Y	D; S&C	D; HCC; O	Part of £72.5m	by10/by15
Local Highway – on & off site	Y	Y	D; S&C	D; HCC	Part of £72.5m	by10/by15
Sustainable Travel – Public Transport	Y	Y	D; S&C	D; HCC	Part of £72.5m	by10/by15
Sustainable travel – walking and cycling on & off site	Y	Y	D; S&C	D; HCC	Part of £72.5m	by10/by15
Education						
Primary (assumes £8.7m per new 2FE primary school and £12.4m per new 3FE primary school)	1 x 3FE	1 x 3FE 1 x 2FE	D; S&C	D; HCC	£33.5m	by10/by15
Secondary (assumes £37.3m per new 8FE secondary school)	1 x 8- 10FE	-	D; S&C	D; HCC	£46.6m	by10/by15
Early years	Y	Y	D; S&C	D; HCC	Part of £3.6m	by10/by15
Green Infrastructure	CMO	CMO	D; S&C	D; CMO; O	£TBC	by10/by15
Strategic Open Space including country park	Y	Y	D; S&C	D	Part of £12.3m	by10/by15
Local Open Space/ play space	Y	Y	D; S&C	D	Part of £12.3m	by10/by15
Community Facilities						
Health – sqm estimated floorspace provided on site	394	573	D; S&C	D; O	Part of £7.6m	by10/by15
Other community such as multi-function community buildings and land	Y	Y	D; S&C; O	D; O; HCC	Part of £12.3m	by10/by15
SUDS	Y	Y	D; S&C	D	£TBC	by10/by15

	East Hemel Hempstead (North) Broad Location	East Hemel Hempstead (South) Broad Location	Funding Source(s): landowner/ developer (D)/S106 &/or CIL (S&C)/Other (O)	Key delivery stakeholder(s): landowner/ developer (D); LA; HCC; Other (O)	Estimated Total Cost	Est delivery phase by yr 5/by yr 10/by yr 15
Energy strategy/ renewable energy	Y	Y	D; S&C	D	£61.5m	by10/by15
Digital infrastructure	Y	Y	D	D; O; HCC	£TBC	by10/by15

Note: CMO - Community management organisation required.

Source: 2018/2019 Infrastructure Delivery Plan

4.4.9. The estimated total costs set out in the IDS are cumulative totals for the Allocation comprised of emerging Policies S6 i) , ii) and iii). The estimated total costs are not generally broken down into the appropriate proportionate costs for each development. The exception is education where a precise cost in relation to a type of school (primary or secondary) is specified. As relevant TCE may make further submissions through the local plan Examination process and the preparation and determination of the planning application re: predicated costs and timing of key infrastructure items, noting that many of the items in the SADC IDP will likely require an update through this process’.

4.4.10. Hemel Garden Communities (HGC) is supported by a Charter, and emerging evidence of infrastructure requirements. At this time, the National Planning Policy Framework (NPPF) is silent on the weight to be provided to Garden Town designations in the determination of planning applications. A significant proportion of the HGC proposals, save those identified in SADC emerging Local Plan policies S6 (i-iv), are not yet included in a emerging development plan. These are the elements in DBC. At this time, and given the Charter and Garden Town Designation, TCE will approach infrastructure delivery for the wider HGC on the basis of:

- **Transport Assessment sensitivity analysis** – with a model run that factors HGC future impacts, beyond the emerging plan periods.
- Consideration of relevant future **socio economic infrastructure needs**, such as education, in respect of the approach taken with LEHH.
- The approach to the **land use masterplan development parameters**, for example with respect to link road location and the local centres. Notably, how this is conveyed in a Strategic Spatial Masterplan (TCE’s response to the Strategic Spatial Masterplanning Toolkit – SSMT).
- Consideration of any **land safeguarding** required for future infrastructure, likely highways.

4.5. It is likely to be the case that the vast majority of infrastructure to support LEHH will have resultant wider benefit. It is also likely to be the case that this infrastructure can serve to mitigate the impact of the LEHH Proposal, without any bearing on the future HGC.

5. Infrastructure Categories

5.1. Introduction

5.1.1. The development Proposal includes the delivery of infrastructure to support the level of development. This chapter considers the following infrastructure categories:

- Transport infrastructure
- Education (early years, primary and secondary)
- Police services
- Green Infrastructure/open space
- GP and dental surgeries
- Libraries
- Community facilities
- Water/sustainable urban drainage systems (SUDS)
- Stewardship
- Renewable energy
- Waste & Recycling
- Utilities
- Fire Hydrants
- Digital infrastructure.

5.1.2. Each infrastructure section contains the following structure and information:

- a) Proposed infrastructure/contribution
- b) Needs arising from the development Proposal
- c) Justification for proposed infrastructure/contribution and demonstration that it does not prejudice the rest of the Allocation and HGC
- d) Cost and funding mechanisms
- e) Key delivery stakeholders.

Transport Infrastructure

5.1.3. This section presents the proposed transport infrastructure for the Proposal site. Key documents which provide guidance or evidence for the proposed transport in the planning applications include-

- HCC's 'M1 Hertfordshire – Facilitating Growth Around Hemel Hempstead – Confirming The Case for Investment in Highways England's Road Investment Strategy 2' (2017);
- Hertfordshire LEP's 'Maylands Growth Corridor Investment Prospectus' (2018);
- HCC's 'Hertfordshire's Local Transport Plan 2018 – 2031' (2018); and
- HCC's draft 'Guide to Developer Infrastructure Contributions' (2019).

5.2. Strategic – LTP4 Major Scheme

a) *Proposed infrastructure/contribution*

- Land and funding to facilitate the design of improvements to J8 of the M1

- [Improvements to J8 of the M1 are anticipated to be triggered by the cumulative impacts of EHH and other cumulative schemes. The works would include a new link road crossing over the M1 to the north of Junction 8. This link road would connect to Green Lane via the commercial area Spine Road. On the east side of the M1 a new enhanced roundabout connection would be provided to connect to the M1].

b) Needs arising from the development Proposal

- 5.2.1. There is currently congestion on the A414 / Breakspear Way at the junction with Green Lane which is in the vicinity of M1 Junction 8. The M1 Junction 8, the A414 /Breakspear Way/Green Lane junction and A414 which spans the two junctions comprise the main gateway to Hemel Hempstead for people accessing jobs and services.
- 5.2.2. A transport modelling exercise has been undertaken to assess the impacts of the Proposal on this area. The modelling undertaken uses the Hemel Hempstead Paramics Transport Model (HHPTM) which was originally used for the Maylands Growth Corridor Study and it has been agreed with the authorities that this model is suitable for the use for the EHH planning application.
- 5.2.3. As part of the Proposal the key assessment scenarios have been set out. There are three tests for the EHH application as follows:
- Standalone Test
 - Core Test
 - Cumulative Test
- 5.2.4. The standalone test considers the effect of the Proposal in its own right compared to the 2019 Base Model assuming no other committed development.
- 5.2.5. The core test considers the effect of the Proposal in relation to the 2019 Reference Case Model which includes significant committed developments as set out by the authorities in the EIA Scoping Response.
- 5.2.6. The cumulative test considers the effect of EHH at the end of the Plan Period (2036). This test relies on the outputs of HCC COMET Model and assess the cumulative effect of EHH alongside other allocated sites. Hence this test has regard for the whole Allocation.
- 5.2.7. The proposed infrastructure responds to the transport modelling.

c) Justification for proposed infrastructure/contribution and demonstration that it does not prejudice the rest of the Allocation and HGC

- 5.2.8. M1 Junction 8 improvement has been designed to reduce the pressure on the A414 for vehicles accessing / egressing the Maylands Area by removing them from the A414.
- 5.2.9. The proposals have been designed to allow for future connections to be delivered to enable enhanced connectivity to the M1 as part of HGC and as such do not prejudice HGC.

d) Cost and funding mechanisms

- 5.2.10. [TBD. Funding options include: Hertfordshire Local Enterprise Partnership (LEP); Enterprise Zone (EZ) forward funding through business rate retention; Road Investment Strategy (RIS) 2; and S106 from other planning applications who benefit from the infrastructure].

- 5.2.11. [As per the SADC IDP, the cost for this infrastructure element is part of an overall transport programme of [£72.5m] that includes both local and strategic infrastructure].

e) Key delivery stakeholders

- 5.2.12. TCE; HCC; SADC; DBC; HE; existing and future businesses and residents in the wider area

5.3. Local Highways

a) Proposed infrastructure/contribution

- 5.3.1. An access and highway improvement strategy has been developed which focuses on the new Spine Road passing from Redbourn Road at the northern edge of the northern site to Hemel Hempstead Road at the southern edge of the southern site.

- 5.3.2. Alongside this there will be a range of off-site highways mitigation which are yet to be confirmed at this time and are subject to traffic modelling.

b) Needs arising from the development Proposal

- 5.3.3. The proposed infrastructure will respond to the transport modelling discussed above.

c) Justification for proposed infrastructure/contribution and demonstration that it does not prejudice the rest of the Allocation and HGC

- 5.3.4. New and enhanced access points to the proposed development site will improve traffic movement throughout the area. New roundabouts, crossings, and road upgrades will ensure the mitigation of the development Proposal on the existing road network and enable the road network to suitably support the proposals.

- 5.3.5. The improved road network will not only be of benefit to movement within and around LEHH but it will create links with HGC. This will ensure that HGC is well-integrated with LEHH.

d) Cost and funding mechanisms

- 5.3.6. [Funding options include: Hertfordshire Local Enterprise Partnership (LEP); Enterprise Zone (EZ) forward funding through business rate retention; and S106 from other developments which would benefit from the infrastructure].

- 5.3.7. [As per the SADC IDP, the cost for this infrastructure element is part of an overall transport programme of [£72.5m] that includes both local and strategic infrastructure].

e) Key delivery stakeholders

- 5.3.8. TCE; HCC; SADC; DBC; existing and future businesses and residents in the wider area

5.4. Sustainable Travel – Public Transport & Transport Planning

a) Proposed infrastructure/contribution

- 5.4.1. To facilitate a modal shift amongst new residents the development will seek to extend the existing bus routes or help to fund a new route that will service the new communities and enable its integration with the wider transport network. (Other sustainable forms of transport such as walking and cycling will also facilitate

the modal shift. These are discussed below.)

- 5.4.2. [The proposed bus strategy is subject to further discussion with HCC but may include the extension of existing services or the creation of new services.]
- 5.4.3. A Multi Modal Transport Interchange will be included within the Central Commercial Area of the site to enable easy use of public transport and interchanges to last mile solutions (walking/cycling etc).
- 5.4.4. A Travel Plan will be developed which would include transport vouchers, car clubs, cycle hire and other elements to encourage a modal shift.

b) Needs arising from the development Proposal

- 5.4.5. There is a need to achieve a modal shift towards the use of public transport amongst new residents and workers. The new community comprised of about 3,100 new dwellings and new commercial premises needs to achieve a reduction in the proportion of journeys made by private car.

c) Justification for proposed infrastructure/contribution and demonstration that it does not prejudice the rest of the Allocation and HGC

- 5.4.6. To facilitate residents' and workers' shift from private car journeys to public transport. Ensuring a modal shift amongst residents will free up the roads and make development feasible in HGC.

d) Cost and funding mechanisms

- 5.4.7. [TBD depending on routing].
- 5.4.8. [As per the SADC IDP, some of the cost for this infrastructure category is included in an overall transport programme of [£72.5m] that includes both local and strategic infrastructure].

e) Key delivery stakeholders

- 5.4.9. TCE; HCC; SADC; DBC

5.5. Sustainable travel – Walking and Cycling

a) Proposed infrastructure/contribution

- 5.5.1. Throughout the development a primary walk and cycle route would be provided alongside the Spine Road (in the residential areas) on one side. The path would connect to the Nickey Line in the north and would also link up to Spencer's Park to the west crossing Cherry Tree Lane.
- 5.5.2. On the other side of the road a 2.0m path would be provided.
- 5.5.3. Through the commercial area, two routes are proposed. The first would run through the landscaped area between Green Lane and the commercial buildings and would link up with the pedestrian

b) Needs arising from the development Proposal

- 5.5.4. These initiatives will help to achieve a modal shift away from private car use. The new community comprised of about 3,100 new dwellings and new commercial premises will need to reduce private car usage.

c) Justification for proposed infrastructure/contribution and demonstration that it does not prejudice the

- 5.5.5. The development Proposal would seek to minimise the need for new residents to travel by private car. This will be achieved through the creation of communities that are well connected to the existing urban environment by safe and attractive walking and cycling routes.

d) Cost and funding mechanisms

- 5.5.6. [TBD. There could be a contribution for a bike hire station in the commercial district and an upgrade of local cycle network].
- 5.5.7. [As per the SADC IDP, some of the cost for this infrastructure category is included in an overall transport programme of [£72.5m] that includes both local and strategic infrastructure].
- 5.5.8. [Other sources of funding include the Department for Transport's cycling and walking programmes as well as their local transport programmes that are funded through local bodies such as the Hertfordshire LEP's Local Growth Fund].

e) Key delivery stakeholders

- 5.5.9. TCE; HCC; SADC; DBC

Education

- 5.5.10. This section presents the proposed infrastructure for early years education, primary and secondary school its justification. The proposals for primary and secondary school have been covered in a more detailed Education Briefing Note that was shared with the relevant local authorities. The Note assesses the evidence used by HCC for its policy requirements for education. It concludes that the application of national policies and principles means that the scale of education provision required to meet the needs arising from the development Proposal is less than that which is set out in the emerging Local Plan policies.
- 5.5.11. It should be noted that the residential development in TCE's planning application at EHH South ('the Proposal') is not the complete proposed Allocation in the emerging policy. TCE's proposal for a single 2FE primary school reflects a level of provision which responds to this lower level of residential development. The Education Briefing Note referred to in the preceding paragraph not only assesses the need arising from development Proposal but also the need arising if the site were fully built out to reflect planning policy. The part of the site not brought forward in the development Proposal is likely to be brought forward in a later planning application.

5.6. Early Years Education

a) Proposed infrastructure/contribution

- 5.6.1. The development Proposal includes provision for nursery schools. HCC's draft '*Guide to Developer Infrastructure Contributions*' says that a new primary school would generally include a 30 places for a nursery. We have used this applied this principle for a 2FE primary school and assumed a 3FE primary school could include provision for 60 nursery places.
- 5.6.2. There is an opportunity for other nurseries to locate in the proposed local centres and community centres.

b) Needs arising from the development Proposal

- 5.6.3. We have not calculated the need arising in this instance but have used HCC's draft guidance of 30 nursery school places for a new 2FE primary school. HCC's assumption does not appear to be drawn directly from evidence of pupil yields. The guidance acknowledges that there are many ways to provide nursery school places and only some of them are provided through new primary schools.

c) Justification for proposed infrastructure/contribution and demonstration that it does not prejudice the rest of the Allocation and HGC

- 5.6.4. Nursery provision is provided locally and so the rest of HGC will make its own local provision for nursery schools independent of EHH.

d) Cost and funding mechanisms

- 5.6.5. [TBD The costs could include school build costs as well as the provision of land which TCE could provide for the schools].

- 5.6.6. [As per the SADC IDP the cost of providing premises for early years education within a primary school is [£3.6m]. It is unclear whether the figure is for all nursery provision].

e) Key delivery stakeholders

- 5.6.7. TCE; HCC; SADC; DBC

5.7. Primary School Education

a) Proposed infrastructure/contribution

- 5.7.1. TCE proposes two primary schools in its current planning application. A 3FE is proposed at EHH North and another 2FE at EHH South (expandable to 3FE or with the option for a further school in the remainder of Allocation S6 (iii)).

- 5.7.2. The delivery of the schools will be phased alongside the delivery of the housing to ensure the educational needs of new residents can be met throughout the growth of the development.

b) Needs arising from the development Proposal

- 5.7.3. In considering the proposed primary schools we estimated the needs arising using different pupil yields scenarios. We also took in to consideration the surplus school places at existing schools (in EHH North) and the impact of some students attending independent (private) schools (at both EHH North and South).

- 5.7.4. Our analysis finds that one 2FE at EHH North and another at EHH South would be sufficient to address the need arising from the development Proposal. At EHH North, in the event that demand were greater than anticipated, the 2FE would be expandable to incorporate an additional 1FE.

- 5.7.5. TCE's proposal is consistent with the wider principles of policy including CIL Regulation 122 and DfE's 'Securing Developer Contributions for Education' (2019) which covers the type of evidence required to support policymaking for schools. It is also consistent with emerging policy S6. Details of the assessment of primary schools can be found in the Education Briefing Note (which would be submitted to inform the planning application).

c) Justification for proposed infrastructure/contribution and demonstration that it does not prejudice the

rest of the Allocation and HGC

5.7.6. Our analysis of pupil yields concludes that one 2FE at EHH North and another at EHH South is anticipated to be sufficient to meet the needs arising from the development Proposal. (If demand at EHH North is greater than anticipated then the proposed school could be expanded.) In order to demonstrate coordinated infrastructure delivery, land will be set aside for a 3FE in EHH North, and planning approval will be sought for a school of this scale.

5.7.7. As the two primary schools are anticipated to be sufficient to meet the needs arising from the development Proposal it therefore would not prejudice the deliverability of HGC. The needs arising from the other sites within HGC would be met by other primary schools on other sites.

d) Cost and funding mechanisms

5.7.8. [TBD. The costs could include the build costs as well as the provision of land which TCE could provide for the schools].

5.7.9. [The SADC IDP assumes £8.7m for a new 2FE primary school and £12.4 for a new 3FE primary school].

e) Key delivery stakeholders

5.7.10. TCE; HCC; SADC; DBC

5.8. Secondary School Education

a) Proposed infrastructure/contribution

5.8.1. TCE is making provision of land for one 8FE secondary school at EHH North. The delivery of the secondary school will be phased alongside the delivery of the housing to ensure the educational needs of new residents can be met throughout the development. Our analysis finds that 8FE would exceed the needs arising from the development Proposal and therefore TCE currently proposes to pay for provision of up to 4FE of the 8FE school. TCE would set aside sufficient land to accommodate an 8FE secondary school. The 8FE school will meet the needs of the entire S6 (i-iv) allocation, and also those arising from Spencers Park (this totals circa 6,446 dwellings). Thus, it would be appropriate to phase its provision.

b) Needs arising from the development Proposal

5.8.2. In considering the appropriate size of the secondary school we estimated the needs arising using different pupil yield scenarios. We also took in to account the surplus of school places at existing schools and the impact of students attending independent (private) schools.

5.8.3. Based on our analysis we conclude that the needs arising from the development Proposal are for school places equal to between 2FE and 3FE. A single 8FE would meet substantially greater need than that arising from the development Proposal.

c) Justification for proposed infrastructure/contribution and demonstration that it does not prejudice the rest of the Allocation and HGC

5.8.4. Our analysis of pupil yields concludes that the development Proposal is anticipated to generate demand for between 2FE and 3FE of secondary school places. The 8FE that is in the development Proposal is more than sufficient to meet the needs arising from the development Proposal and therefore would not prejudice the deliverability of HGC.

5.8.5. Given the development Proposal's overprovision of secondary school places and the fact that future parts of HGC will be within the catchment of the proposed secondary school, the development Proposal could help to ensure there are sufficient secondary school places to accommodate anticipated further development in other parts of HGC, notably the remaining parts of S6 (i-iv) and land at Spencers Park.

5.8.6. The current estimate is that HGC would deliver about 11,000 homes including those currently proposed at EHH North and South. The balance of secondary education provision will be a matter for the Local Plan Review in DBC and will be aligned to that plan period / delivery trajectory.

d) Cost and funding mechanisms

5.8.7. [TBD. The cost would cover 4FE of an 8FE secondary school. The costs would also include the value of the land provided by TCE for the school. The rest of the school would be covered by other S106 agreements and funding pots from the Department for Education].

5.8.8. [The SADC IDP estimates £37.3m for a new 8FE secondary school].

e) Key delivery stakeholders

5.8.9. TCE; HCC; SADC; DBC

Police Services

5.9. Police Services

5.9.1. There are ongoing discussions with the Hertfordshire Constabulary (HC) over the appropriate level of contribution for police services for EHH. [On 4th October the HC sent a note to TCE which responds to a list of questions from TCE requesting justification for an initial request. The HC's note is currently being assessed and a response by TCE will be forthcoming].

a) Proposed infrastructure/contribution

5.9.2. TCE's development Proposal would currently provide a 95 sqm police community hub at EHH North. However this is contingent upon ongoing discussions between TCE and the HC. It is likely to change as a result of ongoing discussions.

b) Needs arising from the development Proposal

5.9.3. The current letter from HC requested a contribution of about £0.5m for the setup costs of new staff, premises and vehicles to meet the needs arising from the development Proposal. TCE is currently reviewing the letter to assess whether it is robust and meets the CIL tests. TCE will be responding shortly to this latest note.

c) Justification for proposed infrastructure/contribution and demonstration that it does not prejudice the rest of the Allocation and HGC

5.9.4. [The HC's note from 4th October bases its calculation of needs arising from the development Proposal on the impact of all of HGC coming forward (approximately 11,000) and then assessing a pro rata contribution. This could be an appropriate method to ensure that TCE's contribution to police services does not prejudice HGC but needs to be fully assessed].

5.9.5. To recap, the note that TCE sent to the HC about the appropriate process for determining the amount of infrastructure for which the development should pay, the following steps should be undertaken:

- Review the current delivery model for police services in Hertfordshire. This would include an estimate of the level of service provision, e.g., police officers & support staff and facilities per population/household.
- Review the future delivery model for police services and determine if there are any changes to policy or practice that could impact on the level or type of service provision.
- Estimate the need for police services arising from the development Proposal. This would typically be based on multiplying the anticipated level of service provision per household by the number of units in the development Proposal.
- Review the capacity of existing infrastructure to determine the extent to which the needs arising from the development Proposal can be met with existing facilities. This should take in to account any capacity that could be freed up or lost as a consequence of the evolving service delivery model.
- Calculate the net needs arising from the development after anticipated surplus capacity (if relevant) is subtracted from total needs arising. If there is a deficit in existing/future capacity before taking account of the development this should not be deducted as the legislation only required the development to meet the new needs it is creating and not any existing/other needs.
- Set out how the development can meet the identified net need.

d) Cost and funding mechanisms

5.9.6. The costs will be negotiated with Hertfordshire Police and are anticipated to be modest in comparison to the majority of infrastructure commitments.

e) Key delivery stakeholders

5.9.7. TCE; Hertfordshire Constabulary; SADC; DBC

Green Infrastructure

5.10. Green Infrastructure

a) Proposed infrastructure/contribution

5.10.1. The development Proposal contains [circa] 44 hectares of green infrastructure. **Table 5.1** below summarises the green infrastructure that includes strategic open space (including country parks) and local open space/ play space. The figures are current estimates of the proposed provision and will be fixed via reserved matters and secured by condition/ S106 obligation as required. Table 5.1 outlines the provision for the Proposal.

Table 5.1 Proposed Open Space Provision (Circa Figures) [SUBJECT TO LAND USE PARAMETERS FIX]

Area	Open Space Typology	Amount (ha)
Northern Site	NEAP (Neighbourhood Equipped Area for Play)	0.10
	LEAP (Local Equipped Area of Play)	0.08
	LAPs (Local Area of Play)	0.09
	Amenity Green Space	5.90
	Natural/Semi Natural Space	1.97
	Parks & Gardens	4.72
	Allotments	1.77
	Children's Play Space	0.24
	Teenager Play Space	0.07
	District Park	8.65
	Community Orchard	1.26
	Total	24.84
Southern Site	MUGA (Multi Use Games Area)	0.10
	NEAP (Neighbourhood Equipped Area for Play)	0.10
	LEAP (Local Equipped Area of Play)	0.08
	LAPs (Local Area of Play)	0.09
	Amenity Green Space	4.36
	Natural/Semi Natural Space	1.45
	Parks & Gardens	3.48
	Allotments	1.31
	Children's Play Space	0.17
	Teenager Play Space	0.05
	Local Park	6.39
	Community Orchard	1.25
	Total	18.83
Grand Total	Circa	43.67

5.10.2. The development Proposal seeks to retain many of the existing trees and hedgerows. The retained trees and hedgerows will be supplemented by additional planting within the development areas and in the new public open spaces. Particular attention will be paid to the opportunities for landscaping along the central spine to help mitigate impacts on the setting of designated heritage assets and the new local and district parks being created.

b) Needs arising from the development Proposal

5.10.3. Emerging SADC Local Plan Policy L28 – Green Space Standards and New Green Space Provision provides quantity space standards for green space. In the policy, publicly accessible green space is

comprised of children's play areas, teenage areas, multi-functional green space, and allotments. The policy requires approximately 37.3 sqm per new resident.

5.10.4. We estimate that the development Proposal could have a residential population of approximately 7,400 (based on the assumption that the average household size would be about 2.4 persons.) The application of the green space standards in the emerging Local Plan generates the need for approximately 27.6 hectares of new green space.

5.10.5. The provision of publicly accessible green space in the development Proposal exceeds the emerging Local Plan space standards by about 16.1 hectares. Further work will consider if this is required and/or who will pay for this land and infrastructure.

c) Justification for proposed infrastructure/contribution and demonstration that it does not prejudice the rest of the Allocation and HGC

5.10.6. Given that the provision of green space in the development Proposal exceeds policy guidance, any green infrastructure that is accessible to residents in the latter stages of developing out HGC will help meet some of the needs arising. Therefore it is likely that the development Proposal will support the further development of HGC. The emerging Strategic Spatial Masterplan outlines that the remainder of the Allocation can be delivered with an appropriate amount of Green Infrastructure.

d) Cost and funding mechanisms

5.10.7. [TBD. This could be comprised of both capital costs and ongoing revenue costs].

5.10.8. [The SADC IDP estimates that both strategic open space and local open space / play space is £12.3m. This includes the cost for a country park].

e) Key delivery stakeholders

5.10.9. TCE; HCC; SADC; DBC [any COMMUNITY TRUST]

GP and Dental Surgeries

5.11. GP Surgeries

5.11.1. The local centres in the Proposed development will provide the day-to-day services to ensure the development Proposal is sustainable. The local centres will provide health services and community buildings.

a) Proposed infrastructure/contribution

5.11.2. TCE currently proposes a 697 sqm GP surgery and pharmacy at EHH North and a 558 sqm surgery and pharmacy at EHH South to be delivered within the respective Local Centres. It has not been determined how the floorspace would be allocated between the GP surgeries and the pharmacies. If all the floorspace were devoted to the GP surgery then it could accommodate up to about 6.3 GPs. This is based on advice from the Herts Valley CCG which uses a benchmark of 199 sqm required for a single GP.

5.11.3. The total floorspace proposed by TCE is the equivalent to having capacity to provide medical services to more than 12,600 residents based on another NHS England benchmark which assumes one GP can cover

2,000 patients.

- 5.11.4. With regard to dental facilities it would also deliver two 190 sqm premises. One would be at EHH North and the other at EHH South.

b) Needs arising from the development Proposal

- 5.11.5. Based on our estimate of 7,400 residents who would live at the proposed development we estimate that 3.7 GP surgeries would be required. (This is based on the assumption that the average household size will be about 2.4 persons and that a GP has capacity to provide medical service to 2,000 patients.)

- 5.11.6. [Further work is required to assess the need for dentist surgeries].

c) Justification for proposed infrastructure/contribution and demonstration that it does not prejudice the rest of the Allocation and HGC

- 5.11.7. On balance the proposed floorspace for GP surgeries has the capacity to provide medical services to the entire anticipated population that would be living at the proposed development. Depending on the amount of floorspace that is ultimately allocated to GP surgeries there is the potential that the development Proposal could have capacity to meet the needs of other parts of HGC that would be able to access them.

d) Cost and funding mechanisms

- 5.11.8. [TBD. According to the SADC IDP the cost of providing GP floorspace is about £2,600 per sqm. Given the currently proposed floorspace in the planning application this would be about £3.2m across the two proposed GP surgeries].

e) Key delivery stakeholders

- 5.11.9. TCE; CCG; SADC; DBC

Libraries and Community Centres

5.12. Libraries

a) Proposed infrastructure/contribution

- 5.12.1. The development proposes a library in the Local Centre in EHH North or the alternative of an off-site contribution.

b) Needs arising from the development Proposal

- 5.12.2. Based on the draft HCC Guide to Developer Infrastructure Contributions the development Proposal could also require a financial contribution for the extension or enhancement of existing libraries that would be impacted by the development. [TBC]

- 5.12.3. The impact of the development Proposal would need to be assessed. It could be that the existing libraries that would service the residents in the development Proposal already have excess capacity. It may be appropriate to make a more modest contribution to equipment and books rather than new buildings or extensions. This is being investigated.

c) Justification for proposed infrastructure/contribution and demonstration that it does not prejudice the rest of the Allocation and HGC

- 5.12.4. The provision of Libraries is considered a site specific matter, to serve the residents of the Proposal. It is not a matter which will have any strategic implications for infrastructure provision.

d) Cost and funding mechanisms

- 5.12.5. [TBD]

e) Key delivery stakeholders

- 5.12.6. TCE; HCC; SADC; DBC [ANY COMMUNITY TRUST]

- 5.12.7. The proposed development would also deliver two 286 sqm community halls. One would be on the Northern Site and the other on the Southern Site.

5.13. **Community Centres**

a) Proposed infrastructure/contribution

- 5.13.1. The development Proposal includes two community halls, one at EHH North and one at EHH South. They are both [286 sqm].

b) Needs arising from the development Proposal

- 5.13.2. [TBD]

c) Justification for proposed infrastructure/contribution and demonstration that it does not prejudice the rest of the Allocation and HGC

- 5.13.3. [TBD]

d) Cost and funding mechanisms

- 5.13.4. [TBD. The SADC IDP estimates that multi function community buildings would cost £12.3m. No detail is provided that explains the basis for the cost or how what a single community building would cost].

e) Key delivery stakeholders

- 5.13.5. TCE; SADC; DBC

Water/Sustainable Urban Drainage Systems (SUDS)

a) Proposed infrastructure/contribution

- 5.13.6. Detailed investigations have been carried out into the required flooding and drainage measures for the development. Sustainable drainage will be provided in the form of attenuation ponds on the Northern and Southern Sites and to the east of the motorway. Following attenuation, the Northern Site will drain to deep borehole soakaway whilst the Central Site and Southern Sites will discharge to the River Ver to the east of the site. [To be confirmed based on the final ES]

b) Needs arising from the development Proposal

5.13.7. The site lies within Flood Risk Zone 1 and is therefore is at minimal risk of flooding.

c) Justification for proposed infrastructure/contribution and demonstration that it does not prejudice the rest of the Allocation and HGC

5.13.8. The Drainage strategy will have full regard to the Allocation, and proposed SUDs, where possible will be designed to account for further development of emerging policy S6 (iii).

d) Cost and funding mechanisms

5.13.9. [TBD]

e) Key delivery stakeholders

5.13.10. TCE; Environment Agency; SADC; DBC

Stewardship

5.13.11. Stewardship of the open spaces and other relevant lands needs to ensure that they are appropriately maintained and they continue to be enjoyed by residents and visitors for perpetuity.

a) Proposed infrastructure/contribution

5.13.12. [TCE may forward a proposition for Stewardship of the site which may involve a Community Management Trust overseeing separate Community Management Companies] [The alternative is for assets to be offered for adoption and long term management by either HCC, SADC or DBC]

b) Needs arising from the development Proposal

5.13.13. [The need for management and stewardship relates to the ongoing management and maintainance of the non privately owned assets (i.e. residential or commercial properties) and those assets which are no adopted highway. These will be the public open spaces, sustainable urban drainage (SUDs) and other community assets].

c) Justification for proposed infrastructure/contribution and demonstration that it does not prejudice the rest of the Allocation and HGC

5.13.14. [Community management and stewardship is considered to be a matter specific to the Proposal. There may well be opportunities to expand the arrangements in the future].

d) Cost and funding mechanisms

5.13.15. TBD

e) Key delivery stakeholders

5.13.16. TCE; SADC; DBC or [Community Management Trust]

Renewable Energy

5.13.17. The proposed development has been designed to achieve high sustainability aspirations and standards. These have been incorporated into a sustainability strategy for the site which is detailed within the Sustainability Strategy document submitted as part of the planning application.

a) Proposed infrastructure/contribution

5.13.18. The energy strategy and renewable energy contributions have not been completed. These details would be dealt with at the reserved matters stage. It is anticipated that the development will make a significant contribution towards sustainability, energy reduction and renewable energy. [FOR DISCUSSION]

b) Needs arising from the development Proposal

5.13.19. Each sub-phase of delivery will mitigate its own impacts and achieve the required BREEAM standards.

c) Justification for proposed infrastructure/contribution and demonstration that it does not prejudice the rest of the Allocation and HGC

5.13.20. The approach to renewable energy is considered as a site or parcel specific matter.

d) Cost and funding mechanisms

5.13.21. [TBD]

e) Key delivery stakeholders

5.13.22. TCE; HCC; SADC; DBC

Waste & Recycling

a) Proposed infrastructure/contribution

5.13.23. The infrastructure will not be on-site. The Proposal will make a contribution towards a district-wide solutions.

b) Needs arising from the development Proposal

5.13.24. Each sub-phase of delivery will mitigate its own impacts.

c) Justification for proposed infrastructure/contribution and demonstration that it does not prejudice the rest of the Allocation and HGC

5.13.25. [TBD]

d) Cost and funding mechanisms

5.13.26. [TBD]

e) Key delivery stakeholders

Utilities

5.13.28. This section covers water and energy distribution. Waste and digital infrastructure are covered separately.

a) *Proposed infrastructure/contribution*

5.13.29. Upgrades to the primary water and electricity network will be required to first enable the Proposal, and then the Allocation. This will be orientated along the main spine road. At least two major electricity sub-stations will be required on site.

b) *Needs arising from the development Proposal*

5.13.30. Each sub-phase of delivery will mitigate its own impacts. This is on the basis of the delivery of the primary utilities infrastructure early in the build, prior to the release of the relevant parcels of development.

c) *Justification for proposed infrastructure/contribution and demonstration that it does not prejudice the rest of the Allocation and HGC*

5.13.31. [TBD]

d) *Cost and funding mechanisms*

5.13.32. [TBD]

e) *Key delivery stakeholders*

5.13.33. TCE; HCC; SADC; DBC

Fire Hydrants

a) *Proposed infrastructure/contribution*

5.13.34. [TBD]

b) *Needs arising from the development Proposal*

5.13.35. Each sub-phase of delivery will mitigate its own impacts.

c) *Justification for proposed infrastructure/contribution and demonstration that it does not prejudice the rest of the Allocation and HGC*

5.13.36. [TBD]

d) *Cost and funding mechanisms*

5.13.37. [TBD]

e) *Key delivery stakeholders*

5.13.38. TCE; HCC; SADC; DBC

Digital Infrastructure

a) *Proposed infrastructure/contribution*

5.13.39. The delivery of the main spine road will be required to first enable the Proposal, and then the Allocation. High Speed Broadband networks can also be laid on this spine road route.

b) *Needs arising from the development Proposal*

5.13.40. The broadband network will be delivered to enable the demand to be met from the Allocation.

c) *Justification for proposed infrastructure/contribution and demonstration that it does not prejudice the rest of the Allocation and HGC*

5.13.41. [TBD]

d) *Cost and funding mechanisms*

5.13.42. [TBD]

e) *Key delivery stakeholders*

5.13.43. TCE; HCC; SADC; DBC

6. S106 Infrastructure List

6.1. Introduction

- 6.1.1. This section uses the broad categories set out in Section 5 and crystallises them into a list of S106 deliverables. **Table 6.1** sets out the list of specific infrastructure items for the Proposal, the basis for its inclusion in the Section 106 list and the trigger point for delivery. The trigger points for a number of S106 infrastructure items is yet to be determined, and have been suggested on the basis of the Proposal and this draft IDP.
- 6.1.2. This section also includes a list of infrastructure that would be delivered in a later phase but within the East Hemel Hempstead emerging Policy S6 iii Broad Locations. This would be the additional infrastructure that would be delivered once the Proposal site was built out. This is presented in **Table 6.2**. [Tables 6.1 and 6.2 are draft]

Table 6.1 S106 List for Planning Application ('the Proposal') [Draft]

Item	Justification	Suggested Trigger Point
Education		
1 x 2 FE primary school (2.1 ha) SOUTH	Emerging Policy S6	TBD
1 x 3 FE primary school (3ha) NORTH	Emerging Policy S6	TBD
1 x 8 FE secondary school (11ha) NORTH	Emerging Policy S6	TBD
2 x Nursery attached to primary schools (part maintained part private, split to be confirmed)	Emerging Policy S6	TBD
Post 16 Education (Further education)	Emerging Policy S6	TBD
Social and Community Infrastructure including Local Centres		
Northern local centre (food store, retail, pub, restaurant, takeaway, café, convenience store - 3,700 sqm)	In Masterplan	[500] residential units in the North
Southern local centre (café, convenience store – 300 sqm)	In Masterplan	[750] residential units in the South
Community building provision (based on 800 sqm building in northern area)	Emerging Policy S6	[500] residential units in the North
Community building provision (based on 800 sqm building in southern area)	Emerging Policy S6	[750] residential units in the South
Northern Police Community Hub (100 sqm)	Request from Police	[500] residential units in the North
GP Surgery and pharmacy provision (750 sqm building in northern area)	In Masterplan; responds to Emerging	TBD
GP Surgery and pharmacy provision (600 sqm building in southern area)	In Masterplan; responds to Emerging	TBD
Dentist provision (200 sqm building in northern area)	In Masterplan; responds to Emerging	[1,000] residential units
Dentist provision (200 sqm building in southern area)	In Masterplan; responds to Emerging	[1,000] residential units
Library contribution to HCC or build obligation on TCE	HCC Request	Phased contributions or build
Nickey Line/ open space/ biodiversity provision/contributions	SADC Request	[200] residential units in North
Provision of northern allotments	Emerging Local Plan policy	[750] residential units in the North
Provision of southern allotments	Emerging Local Plan policy	[500] residential units in the South

Table 6.1 S106 List for Planning Application ('the Proposal') [Draft]

Item	Justification	Suggested Trigger Point
Provision of northern community orchards	Emerging Local Plan policy	[750] residential units in the North
Provision of southern community orchards	Emerging Local Plan policy	[500] residential units in the South
Public Art Relocation		
Public Art relocation		Prior to completion of Breakspear Junction
Transport		
Land and proportional contribution for M1 Junction 8	Transport modelling	Prior to completion of the development
Breakspear junction improvements proportionate to the Proposal	Transport modelling	Prior to occupation of [200] residential units
Relevant off-site Junctions	In Masterplan	TBD
Spine Road delivery and completion (new Green Lane) plus associated infrastructure e.g. drainage, earthworks, landscape, utilities, etc. Also includes public open space	In Masterplan; Strategic abnormal cost	Prior to occupation of [200] residential units in the north and [200] residential units in the
Public transport – bus provision / contributions (Residential plus Commercial)	Travel plan	TBD
Junction at Redbourn Road (B487) up to and including crossing of the Nickey Line	In Masterplan; Strategic abnormal cost	[200] residential units in North
Crossing of Cherry Tree Lane	Included in Infrastructure Abnormal Costs	TBD
Crossing of Punch Bowl Lane	Included in Infrastructure Abnormal Costs	TBD
Green Lane junctions with Hogg End Lane and Boundary Way	Included in Infrastructure Abnormal Costs	TBD
Walking and cycling routes (on-site) including crossings	Included in Infrastructure Abnormal Costs	TBD
Walking and cycling routes (off-site)	HCC Request	TBD
Bridge link over A414 (pedestrian / cycle)	In Masterplan	Prior to occupation of [200] residential units
Multi Modal Transport Interchange (MMTI)	Emerging Policy S6	Prior to occupation of [50,000] sq m
Tertiary MMTI (x6)		TBD
Provision of a funded Travel Plan	As per emerging Transport Assessment	As per Travel Plan
Open Space and Sport Provision		

Table 6.1 S106 List for Planning Application ('the Proposal') [Draft]

Item	Justification	Suggested Trigger Point
Off site Leisure contribution	Discussed at PPA meetings	Phased contributions
On site provision of Children's Play Space (Northern area: 1 NEAP, 2 LEAPS, 9 LAPS and 0.24 ha play space) (Southern area: 1 MUGA, 1 NEAP, 2 LEAPs, 9 LAPs and 0.17 ha play space)	In Masterplan; Emerging Local Plan policy	Subject to Reserved Matters
On site provision of space for teenagers in both northern and southern areas	HCC Request	Subject to Reserved Matters
Provision of Parks and Gardens including provision of Country Park	Included in Infrastructure Abnormal Costs	Subject to Reserved Matters
Provision of Playing Pitches (where justified on the basis of the schools provision)	Included in Infrastructure Abnormal Costs	Subject to Reserved Matters
Maintenance of public open space		Subject to Reserved Matters
Community Management Organisation		Prior to occupation of first residential unit
Fire and Rescue		
Provision of hydrants	HCC Request	Subject to Reserved Matters
Waste and Recycling		
Contribution to upgrades to the Hemel Hempstead Waste Recycling Centre - HCC	HCC Request	Prior to occupation of [1,000] residential
Contribution towards waste collection	SADC Request	Phased contributions
Renewable Energy		
		TBC
Digital Infrastructure		
		TBC
SUDS		
	To ensure adequate drainage	TBC

Source: The Crown Estate

Table 6.2 Infrastructure To Be Delivered After The Planning Application ('The Allocation') [Draft]

Item	Justification	Suggested Trigger Point
Education		
1 x 3 FE primary school (3ha) SOUTH	Emerging Policy S6	TBD
Transport		
Relevant off-site Junctions	In Masterplan	TBD
Public transport – bus provision / contributions (Residential plus Commercial)	Travel plan	TBD
Walking and cycling routes (on-site) including crossings	Included in Infrastructure Abnormal Costs	TBD
Walking and cycling routes (off-site)	HCC Request	TBD
Provision of a funded Travel Plan	As per emerging Transport Assessment	As per Travel Plan
Open Space and Sport Provision		
Off site Leisure contribution	Discussed at PPA meetings	Phased contributions
On site provision of Children's Play Space (Northern area: 1 NEAP, 2 LEAPS, 9 LAPS and 0.24 ha play space) (Southern area: 1 MUGA, 1 NEAP, 2 LEAPS, 9 LAPs and	In Masterplan; Emerging Local Plan policy	Subject to Reserved Matters
On site provision of space for teenagers in southern areas	HCC Request	Subject to Reserved Matters
Provision of Parks and Gardens including provision of Country Park	Included in Infrastructure Abnormal Costs	Subject to Reserved Matters
Provision of Playing Pitches (where justified on the basis of the schools provision)	Included in Infrastructure Abnormal Costs	Subject to Reserved Matters
Maintenance of public open space		Subject to Reserved Matters
Community Management Organisation		Prior to occupation of first residential unit
Fire and Rescue		
Provision of hydrants	HCC Request	Subject to Reserved Matters

Table 6.2 Infrastructure To Be Delivered After The Planning Application ('The Allocation') [Draft]

Item	Justification	Suggested Trigger Point
Waste and Recycling		
Contribution to upgrades to the Hemel Hempstead Waste	HCC Request	Prior to occupation of [1,000] residential units
Contribution towards waste collection	SADC Request	Phased contributions
Renewable Energy		
		TBC
Digital Infrastructure		
		TBC
SUDS		
	To ensure adequate drainage	TBC

7. Overall Infrastructure Phasing

7.1. Introduction

- 7.1.1. This section presents the broad sequence of the phasing of infrastructure and housing. It both broadly reflects and has influenced, the proposed Section 106 triggers in Section 6.
- 7.1.2. TCE is committed to the Proposal's ability to deliver residential units as quickly as possible, subject to obtaining the relevant planning and technical approvals. **Table 7.1** illustrates the broad timing of the key planning events for the Proposal. This is based on the housing delivery timeframes (i.e. financial years).
- 7.1.3. **Table 7.1** shows that it is anticipated that the Proposal's first phase of residential units are completed in Year 6. It should be noted that this timing is predicated on planning permission being granted in Year 2. To ensure that the primary infrastructure can be commenced as soon as planning is granted (subject to receipt of the requisite technical approvals), the Crown Estate intends to undertake this technical work simultaneously with the application. This will enable the primary infrastructure to be completed by Year 5, allowing the first residential parcels to be released.
- 7.1.4. The Crown Estate are keen to investigate opportunities to release land for development earlier, subject to gaining the necessary access and utilities. To further this, the Crown Estate has already commenced dialogue with a number of housebuilders to determine their interest in purchasing serviced land parcels at LEHH.
- 7.1.5. The Proposal will be delivered in phases. [An illustrative trajectory for the residential development and infrastructure delivery for the Proposal is included in **Tables 7.2 and 7.3**]. It is not intended that development phasing be fixed via the outline 'hybrid' permission, as the exact details of the relevant sub phases can be controlled by condition. It is noted that there may be certain 'grampian style' planning conditions that require the delivery of certain highways and education infrastructure. The suggestions for the relevant timing are outlined based on the following elements of the application:
- Parameter Plans
 - Environmental Statement
 - Transport Assessment
 - Planning Statement – noting for example agreed approach to planning conditions / Section 106 Heads of Terms and approach to education
 - Future Proofing Statement – outlining how the Proposal and IDP is non prejudicial on the future delivery of the remaining elements of emerging policy S6 and HGC.

Table 7.1 Broad Timing Of Key Planning Events (based on Financial Years) [Draft]

Financial Years	Q4 Year 1	Q1 Year 2	Q2 Year 2	Q3 Year 2	Q4 Year 2	Q1 Year 3	Q2 Year 3	Q3 Year 3	Q4 Year 3	Q1 Year 4	Q2 Year 4	Q3 Year 4	Q4 Year 4	Q1 Year 5	Q2 Year 5	Q3 Year 5	Q4 Year 5	Q1 Year 6
Planning Application																		
Preparation of Planning Application	■																	
Submission of Planning Application		■																
Resolution to Grant			■	■														
S106 and S278 Signed				■	■													
Expiry of Judicial Review						■												
Infrastructure Delivery																		
Detailed Design for Primary Infrastructure	■	■	■	■														
Primary Infrastructure Application Submitted					■													
Primary Infrastructure Application Approved						■	■											
Commence Primary Infrastructure Delivery							■	■	■	■	■	■	■	■	■	■		
Primary Infrastructure Works Completed																■		
Residential Delivery																		
Marketing process of residential plots							■	■	■	■	■	■	■	■				
Exchange of Residential Plots (subject to RMAs and completion of primary infrastructure)												■	■	■	■			
RM Applications for Residential Parcels													■	■	■	■	■	
Completion and Housebuilders Commence Delivery															■	■	■	■
First Units Completed																		■

Table 7.2 Residential and Infrastructure Phasing For Planning Application: North, South & Central Areas [Draft]

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Total
Planning Process																			
Planning Permission																			
Implementation of Infrastructure																			
Residential Delivery																			
North																			
Residential Delivery						75	140	180	180	180	180	180	180	140	100	65			1,600
1 x 3 FE primary school (3ha)	TBD																		
Nursery attached to primary school	TBD																		
1 x 8 FE secondary school (11ha)	TBD																		
Northern local centre (3,700 sqm)																			
Community building provision (based on 800 sqm building)																			
Northern Police Community Hub (100 sq m)																			
GP Surgery and pharmacy provision (750 sqm building)	TBD																		
Dentist provision (200 sqm building)																			
Provision of allotments																			
Provision of community orchards																			
Nickey Line/ open space/ biodiversity provision/contributions																			
Spine Road and associated infrastructure																			
Junction at Redbourn Road (B487) to Nickey Line																			
Crossing of Cherry Tree Lane	TBD																		
Crossing of Punch Bowl Lane	TBD																		
On site provision of Children's Play Space: 1 NEAP, 2 LEAPS, 9 LAPS and 0.24 ha play space)	Subject to reserved matters																		
On site provision of space for teenagers	Subject to reserved matters																		
South																			
Residential Delivery						75	140	180	180	180	180	180	80						1,195
1 x 2 FE primary school (2.1 ha)	TBD																		
Nursery attached to primary school	TBD																		
Southern local centre (café, convenience store - 300 sq m)																			
Community building provision (based on 800 sqm building)																			
GP Surgery and pharmacy provision (600 sqm building)	TBD																		
Dentist provision (200 sqm building)																			
Provision of southern allotments																			
Provision of community orchards																			
On site provision of Children's Play Space: 1 MUGA, 1 NEAP, 2 LEAPS, 9 LAPS and 0.17 ha play space	Subject to reserved matters																		
On site provision of space for teenagers	Subject to reserved matters																		
Central																			
Commercial Delivery (Sqft)																			
Green Lane junctions with Hogg End Lane and Boundary Way	TBD					877,200	0	446,645	77,900	0	115,690	0	76,150	0	59,125	0	102,625	1,652,710	
Multi Modal Transport Interchange (MMTI)																			
Tertiary MMTI (x6)	TBD																		

Table 7.2 (Con't) Infrastructure Phasing For The Proposal: Items For Which Infrastructure Location Not Know/Provided Across The Site

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Total
Planning Process																			
Planning Permission																			
Implementation of Infrastructure																			
Residential Delivery																			
North																			
Residential Delivery						75	140	180	180	180	180	180	180	140	100	65			1,600
South																			
Residential Delivery						75	140	180	180	180	180	180	80						1,195
Infrastructure in which location not yet known and/ or provided across site																			
Post 16 Education (Further education)	TBD																		
Library contribution to HCC or build obligation on TCE	Phased contributions																		
Public Art relocation	TBD																		
Land and proportional contribution for M1 Junction 8	TBD																		
Breakspear junction improvements proportionate to the proposal																			
Relevant off-site Junctions	TBD																		
Public transport – bus provision / contributions	TBD																		
Walking and cycling routes (on-site) including crossings	TBD																		
Walking and cycling routes (off-site)	TBD																		
Bridge link over A414 (pedestrian / cycle)																			
Provision of a funded Travel Plan	As per travel plan																		
Travel Plan monitoring	As per travel plan																		
Off site Leisure contribution	Phased contributions																		
Provision of Parks and Gardens including provision of Country Park	Subject to reserved matters																		
Provision of Playing Pitches	Subject to reserved matters																		
Maintenance of public open space	Subject to reserved matters																		
Community Management Organisation																			
Provision of hydrants	Subject to reserved matters																		
Contribution to upgrades to Waste Recycling Centre																			
Contribution towards waste collection	Phased contributions																		
Renewable energy	TBC																		
Digital infrastructure	TBC																		
SUDS	TBC																		

[Table 7.3 will be populated as detailed information becomes available. The element of the Allocation that is not part of the Proposal will not be delivered before about year 10 and is part of a 16 year build period for the overall application. This is the latter part of the plan period].

[This element of the Allocation will be subject to a planning application which will be submitted in due course].

Table 7.3 Infrastructure Phasing For Element of EHH South Not In The Proposal But Part Of The Allocation [Draft]

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Total
1 x 3 FE primary school (3ha)																	
Relevant off-site Junctions																	
Public transport – bus provision / contributions (Residential plus Commercial)																	
Walking and cycling routes (on-site) including crossings																	
Walking and cycling routes (off-site)																	
Provision of a funded Travel Plan																	
Travel Plan monitoring																	
Off site Leisure contribution																	
On site provision of Children's Play Space																	
On site provision of space for teenagers																	
Provision of Parks and Gardens																	
Provision of Playing Pitches																	
Maintenance of public open space																	
Community Management Organisation																	
Provision of hydrants																	
Contribution to upgrades to the Hemel Hempstead Waste Recycling Centre - HCC																	
Contribution towards waste collection																	
Renewable energy																	
Digital infrastructure																	
SUDS																	

Appendix: Glossary

C2	Residential Institutions
C3	Dwelling Houses
DBC	Dacorum Borough Council
CCG	Clinical Commissioning Group
CIL	Community Infrastructure Levy
DfT	Department for Transport
DfE	Department for Education
EHH	East Hemel Hempstead
FE	Forms of entry
GP	General practitioner
HC	Hertfordshire Constabulary
HCC	Hertfordshire County Council
HGC	Hemel Garden Communities
IDP	Infrastructure Delivery Plan
IDS	Infrastructure Delivery Schedule
LAP	Local Area for Play
LEP	Local Infrastructure Partnership
LEAP	Local Equipped Area for Play
m	Million
NEAP	Neighbourhood Equipped Area for Play
NHS	National Health Service
SADC	St Albans District Council
Sqft	Square feet
Sqm	Square metre
SUDS	Sustainable urban drainage system
TCE	The Crown Estate
TBE	To be discussed

Appendix 2

Savills comments on BNP Paribas Viability Study

Matter 6, Question 20 – Has the economic viability of each of the proposed broad locations been adequately demonstrated in the St Albans CIL and Viability Report (Nov 17)? Is the study robust and does it demonstrate that the Local Plan is viable and based on reasonable assumptions? In particular?

We have reviewed the St Albans Community Infrastructure Levy and Emerging Local Plan Viability Study (BNP Paribas Real Estate, November 2017), which included high level generic site typology testing. We have also reviewed the recently published St Albans Community Infrastructure Levy and Emerging Local Plan Viability Study – Strategic Site Testing (BNP Paribas Real Estate, September 2019), which provided viability assessments of the proposed Broad Locations. This testing includes both of the Crown Estate's residential sites:

- i. **East Hemel (North) (Policy S6(i))** – 1,650 residential units, plus 50x care home beds, 50x extra care beds and 12 assisted living units; and
- ii. **East Hemel (South) (Policy S6(iii))** – 2,400 residential units, plus 50x care home beds, 50x extra care beds and 12 assisted living units.

Whilst we welcome the testing of the Broad Locations and the general methodology adopted, there are a number of assumptions adopted within the BNP Paribas Real Estate ("BNP") report that we feel are unrealistic. Our three main concerns relate to the following assumptions:

1. Unit Mix
2. Private Sales Values
3. S. 106 & CIL

Based on the three items above we would ask that SADC instructs BNP to run revised appraisals for the East Hemel allocations (S6 (i) and S6 (iii)) to assess the impact that these have on their viability. This is important, as currently BNP's analysis suggests that both schemes are viable with the current assumptions in place. However, based on our commentary below we believe that the revised analysis will show that whilst the sites will remain viable, the ability of these sites to deliver additional obligations above those levels currently modelled will be limited.

Our response to the specific questions raised in Matter 6, Question 20 is set out in further detail below.

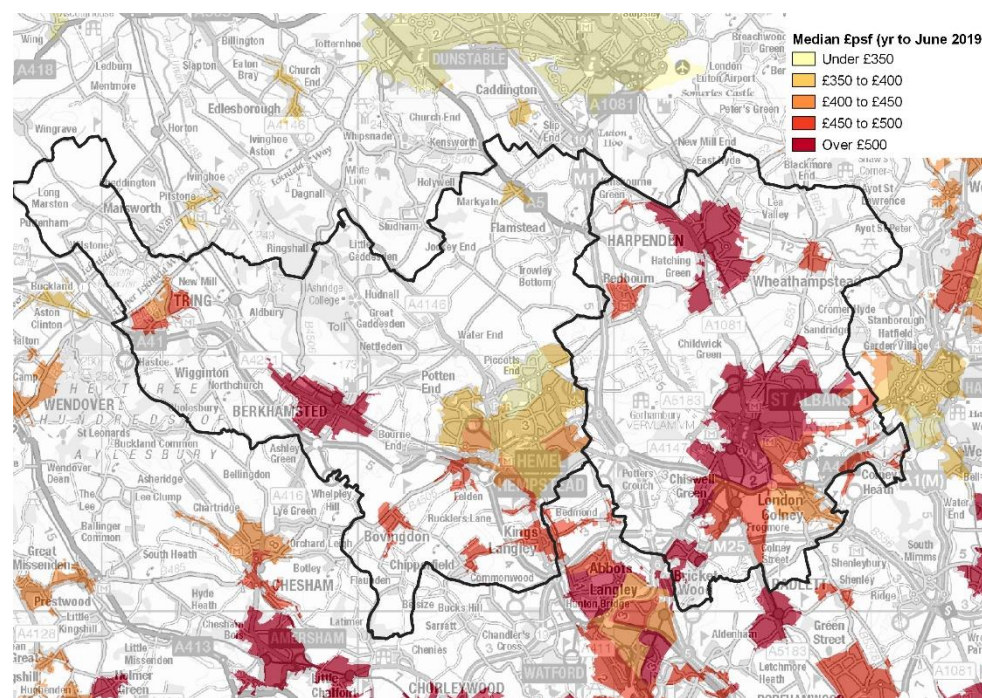
Matter 6 Question 20	Savills Commentary															
a) Is it based on the publication version of the Plan or a previous draft?	<p>From our review of the BNP report, we understand that the majority of assumptions are based on the publication version of the Local Plan. However, the BNP report clearly states that the following unit mix (based on Typology 14 in the previous CIL & Local Plan Viability Report (November 2017)) has been adopted for the purposes of the strategic site testing:</p> <p><u>Table 1 – BNP Housing Mix Assumption</u></p> <table><tr><th></th><th>2 Bed 4p House</th><th>3 Bed 5p House</th><th>4 Bed 7p House</th><th>5 Bed 7p House</th></tr><tr><td>Unit Size</td><td>79 sq m</td><td>93 sq m</td><td>115 sq m</td><td>125 sq m</td></tr><tr><td>% tested in Scheme</td><td>36%</td><td>56%</td><td>4%</td><td>4%</td></tr></table> <p><i>Source: Table 3.2.1, BNP report (November 2017)</i></p> <p>The publication version of the St Albans District Council (SADC) Local Plan states at Policy L1 – Housing Size, Type, Mix and Density that "<i>Development at the Broad Locations is required to provide the specific locally needed mix of housing set out in</i></p>		2 Bed 4p House	3 Bed 5p House	4 Bed 7p House	5 Bed 7p House	Unit Size	79 sq m	93 sq m	115 sq m	125 sq m	% tested in Scheme	36%	56%	4%	4%
	2 Bed 4p House	3 Bed 5p House	4 Bed 7p House	5 Bed 7p House												
Unit Size	79 sq m	93 sq m	115 sq m	125 sq m												
% tested in Scheme	36%	56%	4%	4%												

Matter 6 Question 20	Savills Commentary												
	<p><i>Appendix 6 or as updated by SADC based on more recent housing needs evidence.” A copy of the mix set out in Appendix 6 is reproduced below:</i></p> <p><u>Table 2 – Appendix 6 Housing Mix</u></p> <table><tr><th></th><th>1 Bed</th><th>2 Bed</th><th>3 Bed</th><th>4 Bed+</th><th>Total</th></tr><tr><td>%</td><td>14%</td><td>22%</td><td>57%</td><td>7%</td><td>100%</td></tr></table> <p><i>Source: SADC Local Plan Publication Version</i></p> <p>The housing mix adopted within the BNP strategic site testing is therefore <u>not</u> reflective of the published Local Plan.</p> <p>We would therefore recommend that revised testing is undertaken in accordance with Appendix 6 to ensure that policy compliant testing has been undertaken. This is also important as in order to achieve the Local Plan policy requirements in terms of density (min. 40 dph) all of the identified Broad Locations will be required to deliver a proportion of their units as apartments, which aren’t reflected in the BNP mix. As such the current testing does not adequately reflect the costs of delivering these developments, as typically the construction costs associated with delivering apartment blocks are higher than traditional estate housing.</p> <p>We would also highlight that as the 2019 South West Hertfordshire SHMA is due for release imminently that it would also be sensible for BNP to re-run their analysis on the basis of the revised SHMA mix as soon as it is available.</p>		1 Bed	2 Bed	3 Bed	4 Bed+	Total	%	14%	22%	57%	7%	100%
	1 Bed	2 Bed	3 Bed	4 Bed+	Total								
%	14%	22%	57%	7%	100%								
b) Has the viability assessment been carried out in accordance with the advice in the PPG and is it up to date?	<p>The Strategic Site Testing undertaken by BNP adopts the same base assumptions as modelled in the CIL & Local Plan Viability Testing (November 2017). It does not therefore appear to have been updated to reflect current build cost or private sales value assumptions.</p> <p>Private Sales Values</p> <p>In respect of the private sales values, it should be noted that the current values adopted in the testing of the Broad Locations is the same as in the CIL & Local Plan Viability Testing (November 2017). This splits the SADC administrative area into three ‘Market Areas’, including St Albans, Harpenden and the remaining rural areas.</p> <p><u>Table 3 – Average Private Sales Values</u></p> <table><tr><th>Market Area</th><th>Ave values £s per sq m</th><th>Ave values £s per sq ft</th></tr><tr><td>1</td><td>£6,458</td><td>£600</td></tr><tr><td>2</td><td>£6,082</td><td>£565</td></tr><tr><td>3</td><td>£5,705</td><td>£530</td></tr></table> <p><i>Source: Table 4.4.1, BNP Report (Nov 2017)</i></p> <p>Broadly speaking Market Area 1 and 2 relate to St Albans and Harpenden, with Market Area 3 covering the remaining rural areas. A map illustrating this can be seen in BNP’s 2017 report (Figure 4.4.1).</p>	Market Area	Ave values £s per sq m	Ave values £s per sq ft	1	£6,458	£600	2	£6,082	£565	3	£5,705	£530
Market Area	Ave values £s per sq m	Ave values £s per sq ft											
1	£6,458	£600											
2	£6,082	£565											
3	£5,705	£530											

**Matter 6
Question 20**
Savills Commentary

For the purpose of the Local Plan analysis all of the Broad Locations have been modelled at the same private sales values (Market Zone 3 - £5,705 psm) despite the fact that a number of the Broad Locations fall adjacent to much higher value areas (St Albans and Harpenden) than Hemel Hempstead. It should also be noted that no detailed analysis has been undertaken of the immediate area around Hemel Hempstead and the differences in values achieved in rural village locations compared to edge of town greenfield sites. To help illustrate this point, we have provided an extract from Savills Research average achieved sales value map below.

Figure 2 – Average Private Sales Values Map



Source: Savills Research, Land Registry

This highlights that the average sales values around St Albans and Harpenden are significantly higher (over £500 psf) compared to Hemel Hempstead (£350-£400 psf). We would therefore recommend that a fourth 'Market Area' be adopted for testing the Broad Locations on the edge of Hemel Hempstead.

This will ensure that appropriate private sales values are modelled, which acknowledge the fact that these developments will draw more on Hemel Hempstead than the rural villages in SADC in terms of baseline pricing. Although we would expect a premium over the existing Hemel Hempstead market to be achieved as a result of the proposed high quality design of the developments and associated policies. We would therefore recommend that the Hemel Hempstead Broad Locations are remodelled adopting a Market Area 4 private sales value at £430 psf, reflecting a c. 10% premium over the existing market.

Matter 6 Question 20	Savills Commentary																																				
	<p>Self-Build Plots</p> <p>It would appear that an allowance of £400,000 per plot has been adopted for the purpose of the testing for the Self-Build Plots on each site. However, no evidence has been provided to support these figures, which appear very high bearing in mind the local sales values for 3-4 bedroom homes.</p>																																				
c) Are appropriate assumptions made about the level and timing of infrastructure costs and other costs associated based on the most up to date IDP?	<p>At this stage in the planning process it is inherently difficult to determine the level of Section 106 and 278 contributions that will be required to mitigate the impact of the development. We therefore agree with BNP’s comment that “<i>these costs are likely to be refined as masterplanning of the strategic sites progresses</i>”, however, it is important that a degree of supporting commentary is provided around the suitability of the overall contribution given the scale of the individual developments.</p> <p>In the table below we have summarised the total infrastructure costs adopted in the BNP strategic site testing for the three Hemel Hempstead sites:</p> <p><u>Table 4 – BNP Infrastructure Cost Assumptions</u></p> <table><tr><th>Infrastructure Item</th><th>East Hemel North</th><th>East Hemel South</th></tr><tr><td>Site opening up costs</td><td>£34,120,000</td><td>£49,119,999</td></tr><tr><td>Strategic open space</td><td>£3,300,000</td><td>£4,800,000</td></tr><tr><td>Green infrastructure</td><td>£1,650,000</td><td>£2,400,000</td></tr><tr><td>S. 106</td><td>£2,015,916</td><td>£2,889,392</td></tr><tr><td>CIL</td><td>£13,358,810</td><td>£19,274,446</td></tr><tr><td>Transport</td><td>£18,150,000</td><td>£26,400,000</td></tr><tr><td>Education</td><td>£31,515,000</td><td>£45,840,000</td></tr><tr><td>Community facilities</td><td>£1,650,000</td><td>£2,400,000</td></tr><tr><td>TOTAL</td><td>£105,759,726</td><td>£153,123,837</td></tr><tr><td><i>Total Units</i></td><td><i>1650</i></td><td><i>2400</i></td></tr><tr><td><i>Total £ per unit</i></td><td><i>£64,097</i></td><td><i>£63,802</i></td></tr></table> <p><i>Source: BNP Report</i></p> <p>In our experience it is typical for strategic sites of a similar scale to have Section 106 costs (obligations and contributions) in the region of £30,000 - £40,000 per dwelling (subject to viability) plus additional strategic abnormal costs of £10,000 - £20,000 per dwelling.</p> <p>The BNP Paribas evidence as outlined above is towards the upper end of this range (£60,000 + on the two East Hemel sites), but based on the current stage of planning and available information at this point in time, the resulting figures do not appear to be unreasonable. However, we would question the inclusion of Section 106 and CIL with no explanation of how the two relate (i.e. what is CIL covering when there are already contributions for highways and education in S. 106) to ensure that there is not any risk of double-counting.</p> <p>We would also question the validity of including CIL at this stage, as SADC does not currently have a CIL and will not be able to implement one until after the Local Plan</p>	Infrastructure Item	East Hemel North	East Hemel South	Site opening up costs	£34,120,000	£49,119,999	Strategic open space	£3,300,000	£4,800,000	Green infrastructure	£1,650,000	£2,400,000	S. 106	£2,015,916	£2,889,392	CIL	£13,358,810	£19,274,446	Transport	£18,150,000	£26,400,000	Education	£31,515,000	£45,840,000	Community facilities	£1,650,000	£2,400,000	TOTAL	£105,759,726	£153,123,837	<i>Total Units</i>	<i>1650</i>	<i>2400</i>	<i>Total £ per unit</i>	<i>£64,097</i>	<i>£63,802</i>
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Matter 6 Question 20	Savills Commentary
	process. Given the proposed timescales for the delivery of the two East Hemel allocations (S6 (i) and S6 (iii)) we are therefore unclear as to why this has been included.
d) Is there a contingency allowance? If not, should one be included?	A 5% contingency allowance has been applied to the total build costs, which is a standard assumption.
e) Are appropriate assumptions made about the rate of output?	The BNP report assumes a sales rate of 4 units pcm, which is a conservative assumption based on multiple sales outlets being operational on each site at any point in time.
f) Are appropriate assumptions made about the timing of land purchases?	We have not been provided with copies of the cashflows behind the individual ARGUS Developer appraisals for each of the sites so are unable to comment. However, it is standard practice in a residual land value appraisal such as this to assume a single upfront land payment. Although as discussed elsewhere in this document this may not be the case in reality with purchasers looking to defer payments to limit the impact of finance and holding costs on the development cashflow.
g) Is the viability threshold set at an appropriate level?	The BNP analysis has adopted a greenfield benchmark land value of £370,000 per Ha (c. £150,000 per Ac) for each of the Broad Locations. This is the same assumption as within their previous CIL & Local Plan Viability Study (2017), which appears reasonable.
h) Should an allowance have been made for inflation?	No. We would typically expect all viability modelling to be undertaken on Day One values, i.e. without any build cost or sales value inflation. However, as highlighted above, we note that BNP has not updated its build costs since 2017 and would recommend that these are reviewed, as the same values today would be higher.
i) Is an appropriate allowance made for finance costs?	Yes. The BNP report includes an allowance of 7% of total costs (including land) within their appraisals, which is a reasonable assumption.
j) Is the residual land value methodology appropriate?	The approach adopted by BNP of using a residual land value methodology is generally accepted as an appropriate method for viability testing. However, on large scale development sites, such as the Broad Locations, this method assumes that the site is being purchased by a single developer (for a single upfront payment) who then directly builds and sells the units. In reality, this is unlikely to be the case, with a master developer or landowner instead securing planning permission, providing infrastructure and then selling serviced land parcels to the market with individual units to be delivered by a housebuilder. As a result, it would be more appropriate to use a land trader model, which models the land receipts over the length of the development and looks at different return metrics (for example IRR) to assess whether a scheme is achieving suitable levels of return.

Matter 6 Question 20	Savills Commentary
k) Has income from commercial floorspace been factored into the calculations?	Yes. Each of the appraisals includes the investment value for the non-residential elements of each site, including any local centre uses (i.e. retail) and commercial floorspace. In order to calculate this assumptions on the rental income for each use have been made.

November 2019