

**Examination of the Dacorum Local Plan**

Inspectors: Matthew Birkinshaw BA (Hons) MSc MRTPI

and Thomas Bristow BA MSc MRTPI

Programme Officer: Louise St John Howe

[louise@poservices.co.uk](mailto:louise@poservices.co.uk)

Ronan Leydon  
Head of Strategic Planning  
Dacorum Borough Council  
The Forum, Marlowes  
Hemel Hempstead  
Hertfordshire  
HP1 1DN

6 October 2025

Dear Mr Leydon,

1. We write following the stage 1 hearing sessions held between 16 and 18 September 2025. You will recall that during the sessions, we raised some concerns regarding the evidence in respect of the site selection process and justification for housing allocations in the Plan.
2. The submitted Plan seeks to meet the identified housing needs in Dacorum by releasing land from the Green Belt. Paragraph 142 of the December 2023 National Planning Policy Framework states that the Government attaches great importance to Green Belts. Paragraph 145 explains that authorities may choose to review and alter Green Belt boundaries '*where exceptional circumstances are fully evidenced and justified*'. This note sets out what we need to better understand the justification for how the Council has determined which Green Belt sites to release for development and why.
3. Various documents produced at successive stages of the Local Plan's preparation assess sites for potential allocation. In summary, the Regulation 18 'Emerging Strategy for Growth' consultation was accompanied by a Site Selection Topic Paper [PCD05.1]. Whilst that is a useful document setting out the evidence and processes by which a wide range of sites have been assessed, it describes evidence relevant to site selection only up to November 2020.
4. The Topic Paper was informed by an Urban Capacity Study [SSA04.1] and Rural Strategic Housing Land Availability Assessment with an Addendum to it (the 'Rural SHLAA') [SSA03.1, SSA03.5]. The Rural SHLAA took account of the Stage 1 and Stage 2 Green Belt Reviews of 2013 and 2016 [CSN07.1,

CSN08.1]. The Stage 3 Green Belt Review of 2020 [CSN09.1] is described in the Topic Paper as thereafter informing which sites progressed through a detailed testing stage to proposed site allocations.

5. The Regulation 18 'Revised Strategy for Growth' was then published in 2023 and was accompanied by the October 2023 Strategic Housing Land Availability Assessment [SSA02.1]. The SHLAA, which superseded previous site assessment work, was also informed by the brownfield register.
6. The Regulation 19 version of the Local Plan was accompanied by the Housing and Economic Land Availability Assessment ('HELAA') [SSA01.1]. The HELAA again superseded previous site assessment work. Various site assessments in the HELAA find that a given site is '*potentially suitable*' for allocation, but conclude that '*the development plan process will determine the future suitability of the site*'. Critically, however, it is then unclear by what processes the Council followed to decide which sites should be allocated and the reasons why.
7. The Sustainability Appraisal ('SA') [CD03.1] provides some commentary on site allocations. However, paragraph 9.17.5 of the SA clearly states that '*it is not the role of SA to reach overall conclusions on the plan or individual options, let alone individual site options*'. The Council's commentary at section 7.1.1 provides little substantive detail as to the rationale for allocations. There is also uncertainty as to why certain allocations were proposed to be deleted in the 'Revised Strategy for Growth' but thereafter reintroduced along with 2 additional allocations that did not feature in earlier site assessment work. This is important because the Urban Capacity Study and Rural SHLAA collectively indicated that there was the overall potential for sites to deliver some 26,000 dwellings, significantly more than the Plan's minimum housing requirement.
8. Furthermore, part of the Council's rationale for there being exceptional circumstances for Green Belt release is with reference to the comparative value of different parcels of land assessed in the stages 1, 2 and 3 Green Belt Reviews. However, it is unclear when and why certain allocations have been favoured in that respect. That is notably where the value of a site allocation to the Green Belt has been assessed as equal to, or greater than, other sites not proposed for allocation in the Plan.
9. In summary therefore, despite the documents referred to above, there appears to be no clear and consolidated evidence which sets out the reasons and the judgements that have resulted in the site allocations contained in the submitted Local Plan. Many of those present during stage 1 hearings were equally unable to establish when and why certain sites had been included or discounted as allocations. We need clarity in this respect.
10. We therefore ask that the Council produce the following:

- (i) A succinct commentary on the reasons and judgements made as to why certain sites progressed to allocations but others were discounted (or direct reference to where such evidence currently exists in the examination library). That commentary should follow on from the Topic Paper of 2020, be on a site by site basis, and refer wherever possible to existing evidence. The commentary must move beyond a factual explanation of sites' assessed suitability, availability and achievability, as in the various evidence documents cited above, and provide the justification for the choices made in allocating sites relative to ones that were discounted.
  - (ii) A list of all Green Belt sites proposed for release, along with a justification for their allocation having regard to reasonable alternatives, including sites which were found to cause less harm to the purposes of the Green Belt.
11. We discussed during the stage 1 hearing sessions that it was our initial intention to hold stage 3 hearing sessions into the Dacorum Local Plan in November and December 2025 (following joint hearing sessions with St Albans City and District Council in October concerning strategic matters at the Hemel Garden Communities). Given that the justification for site allocations and Green Belt release is integral to the soundness of the Plan and justification for the allocations, we will need the foregoing evidence before scheduling stage 3 of the examination.
12. Separately we thank the Council for publishing a note on 29 September 2025 responding to our query around engagement with National Highways over cumulative impacts of the Dacorum Local Plan and St Albans Local Plan in respect of the strategic highway network [DBC/ED35]. We will also need to consider any comments made on that note before proceeding with further hearing sessions.
13. Once we have received the information above, we will determine how to progress the examination and advise on future hearing dates accordingly. In seeking to move the examination forward, we would be grateful if the Council could advise on likely timescales for completion of the above work by 20 October 2025. Should you have any questions please feel free to contact us through the Programme Officer. We have asked the Programme Officer to upload a copy of this letter to the examination website, but we are not inviting representations from participants at this stage.

Yours sincerely,

*Matthew Birkinshaw and Thomas Bristow*  
INSPECTORS