



DACORUM LOCAL PLAN TO 2041

Examination in Public

Response to Inspectors' post-Stage 1 Hearings request to the Council: Point (ii)

Following on from the Stage 1 hearings undertaken in September 2025, the Inspectors' requested the Council to produce the following information:

- (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.*

This paper seeks to respond primarily to the second request.

The following table provides a summary of the results of the Green Belt Stage 2 Study ('GBS2') (CSN08.1) alongside the justifications taken from those provided in the Council's response to the first matter (i), for all Green Belt sites proposed for release within the Dacorum Local Plan to 2041 (CD01.1).

The Council consider that 'reasonable alternatives' in this context relate to the sites which were tested as part of the 'reasonable alternative growth scenarios' in Section 6 of the Sustainability Appraisal 2024 (CD03.1). Officers provided an updated proforma and commentary on all these sites within the response to matter (i).

Of those sites which are omitted, officers consider there are clear justifications as to why sites which makes a weaker contribution to the purposes of the Green Belt have not been proposed in the Local Plan to 2041 (CD01.1). The remaining reasonable alternative sites are considered to have major Green Belt constraints, as identified within CSN08.1.

Site Name	HELAA Reference	GBS2 Parcel and Overall Assessment	Summary of GBS2 further assessment conclusions	Justification for their allocation compared to RAs which were found to cause less harm. <i>(As set out within the 'Summary of Officer Recommendations' for each site within the response to point (i) in Inspectors letter)</i>
Polehanger Lane	Hemel113R	Strong HH-A5	<p>The parcel meets Green Belt purposes strongly and was modified to form HH-A5a to account for absolute constraints on the site.</p> <p>Parcel HH-A5a was excluded from further consideration.</p>	<p>Representations provided from the site promoter respond to concerns raised by officers during the 2020 and 2023 site assessment process, as these set out that the site can deliver a bespoke SANG on-site within areas of high landscape sensitivity and this avoids development on the eastern parcel adjacent to the wildlife site (as recommended within PCD05.1 and SSA03.3).</p> <p>Whilst the wider assessment parcel (HH-A5) is judged to make a strong contribution to the purposes of the Green Belt overall, specifically purpose C (with a moderate contribution to A and B), officers consider the proposed developable area is contained by existing features and it is able to deliver significant compensatory improvements to the parts of the site remaining within the Green Belt in the same ownership.</p> <p>Having regard to alternative sites, officers contend that the allocation of Polehanger Lane offers sustainability benefits over other sites which are assessed to contribute to a lesser level to the purposes. The site is located within Hemel Hempstead (the top of the settlement hierarchy), and it enables a scale of development which meets the wider objectives of the spatial strategy. It will provide new infrastructure including a primary school and community facilities, sustainable transport improvements, and specialist types of housing to meet identified needs.</p>
Shendish Manor and Fairfields	Hemel117R	Weak D-S3	<p>The parcel meets Green Belt purposes weakly and should be considered further for assessment.</p> <p>The study considered that a refined area of the parcel, which broadly corresponds to the area of this site,</p>	<p>Following the site promoter's regulation 18 representations in 2023, officers now have sufficient confidence that there is a solution with regards to the provision of vehicular access to this site. Following further traffic modelling and engagement with National Highways, there is additional confidence that the development would not have a significant impact on Junction 20 with the M25.</p> <p>Whilst this site is sensitive in landscape and heritage terms, it is considered these constraints can be mitigated through design. The site is within weakly performing Green Belt and has no significant flood risk, ecological or infrastructure capacity constraints.</p>

			would not compromise the ability of the wider Green Belt to meet its purposes.	<p>The site is in a sustainable location, adjacent to a mainline train station and it can deliver a primary school that will also enable residential-led redevelopment of brownfield sites across the Two Waters Opportunity Area. The site is also able to deliver onsite SANG, reconfigured golf facilities and a neighbourhood centre to include space for health provision.</p> <p>Having regard to the alternative site options, Hemel117R is the only site in Hemel Hempstead located within Green Belt that makes a weak contribution to the purposes, which has sufficient potential to deliver the Spatial Strategy and form part of reasonable alternative growth scenarios within CD03.1. Furthermore, the refined assessment parcel the site is in would not compromise the ability of the wider Green Belt to meet its purposes.</p>
North Hemel Hempstead	Hemel136R	Strong HH-A1	The parcel meets Green Belt purposes strongly, however, is subject to limited constraint and should be take forward for further assessment. Parcel HH-A1 was excluded from further consideration.	<p>Officers continue to recognise the presence of constraints of the site, and a significant amount of evidence has been progressed to ensure proposals respond to these appropriately. It is also considered that the sites constraints can be sufficiently mitigated without preventing the site from being developed, due to its scale. The revised site boundary proposed within HGC07.1, responding to landscape and environmental constraints has reduced the overall site capacity, the site is still capable of delivering around 5,000 new homes plus supporting infrastructure up to 2050.</p> <p>Development of this scale would provide distinct new neighbourhoods with significant new provision of community services and facilities, including multiple neighbourhood centres, primary and secondary schools, health, sports and leisure facilities, community buildings and retail provision. Officers have decided to reduce the level of growth proposed within the period of the local plan to 1,500 homes to reflect likely delivery rates associated with a scheme of this scale.</p> <p>Whilst the wider Green Belt assessment parcel (HH-A1) is judged to make a strong contribution to the purposes of the Green Belt overall, specifically purpose C (with a moderate contribution to A and B), officers consider the site is able to deliver significant compensatory improvements to the parts of the site remaining within the Green Belt, in accordance with the recommendations of the Landscape Study (HGC07.1). This study also notes the opportunity to provide a boundary that is readily recognisable and likely to be permanent, which uses existing features.</p>

				<p>The development of this site would support the wider Hemel Garden Communities programme in partnership with St Albans Council, which aims to deliver up to 11,000 homes across both council areas. HGC has broader ambitions with regards to high quality placemaking, delivering modal shift away from the private car, and establishing a strategy for community stewardship. HGC will also deliver an extension to the Maylands Employment Area (the Hertfordshire Innovation Quarter).</p> <p>The Hemel Garden Communities programme represents a scale of development sufficient to enable the delivery of transformational benefits to the existing services and infrastructure of Hemel Hempstead, particularly with regards to upgraded active and sustainable travel provision and investment in existing local centres.</p> <p>Having regard to alternative sites, whilst officers recognise the strong contribution this site currently has to the Green Belt, that these harms are outweighed by the sustainability benefits associated with this proposal.</p>
South Berkhamsted Urban Extension	Berk019R	Weak D-S2b	The parcel meets Green Belt purposes weakly and should be considered further for assessment.	<p>The allocation of this site is justified by its potential to deliver a comprehensive urban extension in Berkhamsted with a new primary school, health facility, and neighbourhood centre, responding to identified infrastructure pressures within the settlement. The site makes a weak contribution to the purposes of the Green Belt and other constraints identified are likely to be mitigated.</p> <p>Having regard to alternatives, this site is strongly supported given its limited contribution to the Green Belt purposes and limited constraints, and its ability to deliver comprehensive development within a tier 2 settlement.</p>
British Film Institute Archive, Kingshill Way	Berk020R	Weakest D-S2a	Parcel meets Green Belt purposes weakly and should be considered further for assessment.	<p>Officers continue to support the allocation of Berk019R, which, considering secondary school capacity constraints within the settlement and the significant constraints associated with the only site of a sufficient size to deliver a new secondary school (Berk031R), limits the number of further sites which could be considered before the proposed capacity at Ashlyns would be exceeded.</p> <p>This site is considered to perform sequentially better than alternative sites promoted in the settlement, particularly with regards to the site being previously developed, located within Green Belt which makes the weakest contribution to the purposes and lower landscape sensitivity. Development in this location will also be closely located to new</p>

				<p>facilities being delivered on site Berk019R, promoting sustainable patterns of development.</p> <p>It is also within the catchment of the two SANG solutions (Westbrook Hay SANG and Hill Farm Gateway). As the site is not expected to deliver until later in the plan period, it is expected to contribute towards the Hill Farm Gateway SANG.</p> <p>The site is also seeking to re-invest in the BFI conservation centre on site by providing a new purpose-built facility that would support training and skills development, whilst retaining the BFI's presence in the town.</p> <p>The BFI is required to follow a staged business case process, and no development could take place until a facility is provided to relocate the archive material to. Therefore, the site is proposed to deliver within the later parts of the plan period.</p>
Haslam Playing Fields	Berk025R	Weakest D-S2a	Parcel meets Green Belt purposes weakly and should be considered further for assessment.	<p>Officers continue to support the allocation of Berk019R, which taking into account secondary school capacity constraints within the settlement and the significant constraints associated with the only site of a sufficient size to deliver a new secondary school (Berk031R), limits the number of further sites which could be considered before the proposed capacity at Ashlyns would be exceeded.</p> <p>This site is considered to perform sequentially than alternative sites promoted in the settlement, particularly being located within weakest performing Green Belt. Development in this location will also be closely located to new facilities being delivered on site Berk019R, promoting sustainable patterns of development.</p> <p>It is also within the catchment of an established SANG solution. The site is also able to deliver an area of green space on-site to meet deficiencies in the settlement and can deliver replacement sports facilities at a much larger scale than what is being lost on the site, supported in principle by Sport England.</p>
Dunsley Farm	Tring016R	Moderate TR-A5	The wider parcel meets the purposes moderately, however a sub area of the parcel would not compromise the	The site will deliver a primary school and employment land, and benefits from particularly good proximity and links to the town centre, strategic road network and train station. It is also able to deliver SANG within the area which has the potential to unlock other developments within catchment.

			ability of the wider Green Belt to meet its purposes and should be considered for amendment.	Having regard to alternative sites, this site is located within the only wider parcel surrounding Tring assessed as contributing moderately to the purposes of the Green Belt, which is not also located within the Chilterns National Landscape (all others are assessed to make a strong contribution).
Land East of Tring	Tring018R	Strong TR-A2 TR-A3	Both parcels meet the purposes strongly, however, are subject to little constraint, and should be taken forward for further assessment, considering identified constraints. Parcel TR-A3 and the area of TR-A2 which is associated with the site was excluded from further consideration.	<p>With regards to Tring, officers agree with the sustainability appraisal's conclusions in support of allocating East of Tring and that it is able to deliver a comprehensive urban extension. Officers recognise the well-understood sensitivities including given the relationship of this land parcel to the Chilterns National Landscape.</p> <p>The allocation of this site alongside New Mill (Tring025R) allocation represents a logical and comprehensive extension to the town on land between Bulbourne Road and Station Road, which promotes sustainable patterns of development by delivering new and enhanced links with Tring Station and providing greater opportunities for integration with existing communities through the provision of new community and leisure facilities.</p> <p>In coming to a final recommendation, officers also had regard to the Secretary of State Appeal Decision (Mar 2024) (SSA06.1) which confirmed that there was no technical issue with the delivery of the site and that identified impacts could be sufficiently mitigated in a manner consistent with national policy. The Decision was refused solely on grounds of the balance of harm to the Green Belt relative to its benefits as part of the Very Special Circumstances test. Officers, through separate evidence (SSA07.1), consider that exceptional circumstances now exist to remove this site from the Green Belt.</p>
New Mill	Tring025R	Strong TR-A2	The wider parcel meets the purposes strongly, however a sub area of the parcel, which broadly corresponds to the area of this site, would not compromise the ability of the wider Green Belt to meet its purposes and should	<p>The site relates well to the settlement edge and is subject to limited constraints. The allocation of this site alongside the East of Tring (Tr03) allocation represents a more logical and comprehensive extension to the town on land between Bulbourne Road and Station Road, enabling greater opportunities for integration with existing communities and delivering new and enhanced links with Tring Station. While the site does not have its own SANG solution, it can benefit from two third party SANG solutions (surplus SANG capacity at Tr01 – Dunsley Farm or Tr03 – East of Tring).</p> <p>Having regard to alternatives, whilst the wider assessment parcel was assessed as contributing strongly to the purposes of the Green Belt, the Green Belt Stage 2 assessment recommended that the sub-area broadly corresponding with the proposed extent of this</p>

			be considered for amendment.	site would not compromise the ability of the wider Green Belt to meet its purposes and should be considered further.
Grange Farm	Bov010R	Weakest BV-A6	The sub-area meets the Green Belt purposes very weakly and is subject to minor constraint.	This site has planning permission and will deliver 1.15ha of land safeguarded for 'community uses', although the details of this provision are reserved matters. A key issue is confirming the implications for school capacity within the village.
London Road	Mark014R	Strong MY-A3	The wider parcel meets the purposes strongly, however a sub area of the parcel, which broadly corresponds to the area of this site, would not compromise the ability of the wider Green Belt to meet its purposes and should be considered for amendment.	<p>Given the strategic case to allocate some growth in Markyate (CD03.1, paragraph 9.17.32), officers consider this allocation is justified.</p> <p>This site has an area of high flood risk affecting the edge of the site and site access, however both officers contend that the flood risk constraint has been explored in detail through a Level 2 SFRA and that residential development can be sequentially located away from the areas of highest risk.</p> <p>It was confirmed that the site is within the catchment of an established SANG solution, which resolved officer concerns arising in 2023 and enables this site to deliver earlier within the period of the Local Plan.</p> <p>The site was recommended for further consideration as part of the Stage 2 Green Belt study, despite being part of a larger parcel which was assessed to strongly contribute to its purposes. The site also has a low level of landscape, heritage and ecological constraint.</p> <p>Development of this site can be accommodated by the existing infrastructure of the village and can contribute towards supporting the future viability of local services. The site is also expected to address locally arising housing needs including c. 60 affordable homes.</p>