



Strengthening Economic Prosperity



Site Allocations

Background Issues Paper January 2016

Background Issues Papers

Introduction

A series of background papers have been prepared to support the Pre-Submission Site Allocations DPD. These are as follows:

- **The Sustainable Development Strategy:**
 - (a) Green Belt, Rural Area and Settlement Boundaries
 - (b) Transport

- **Strengthening Economic Prosperity**

- **Providing Homes and Community Services**
 - (a) Providing Homes
 - (b) Social Infrastructure

- **Looking After the Environment**

These papers form part of the evidence base. Their role is to inform the content of the Site Allocations DPD through:

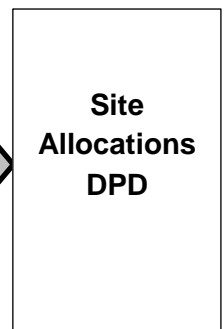
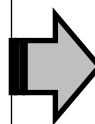
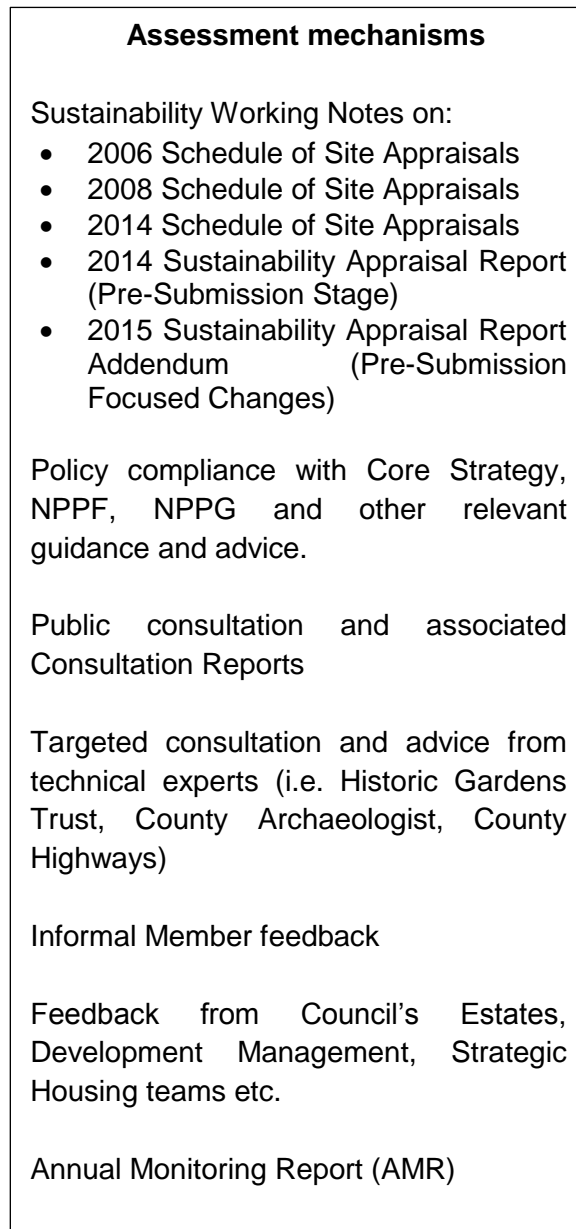
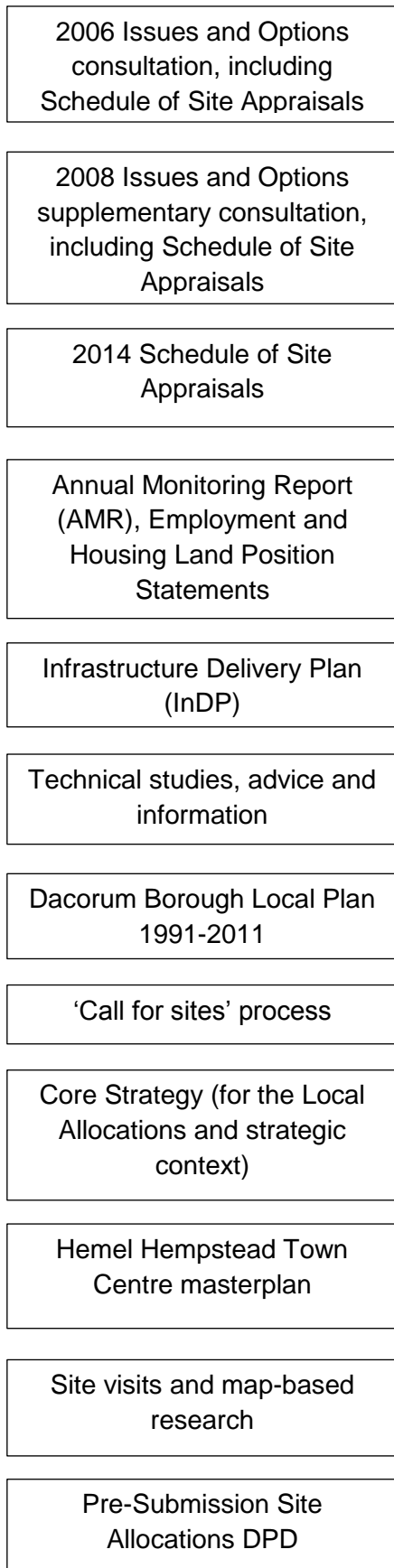
- (a) summarising background policy, guidance and advice relevant to each subject area; and
- (b) assessing which sites, designations and/or boundary changes it is appropriate to take forward in the context of this advice and set out any additional selection criteria used.

Information has been collected from a number of different sources and as the assessment has been an interactive process, incorporating the conclusions of sustainability appraisal and advice from technical experts as appropriate (see Figure 1).

This document is version 3 and updates and supersedes the previous version published in June 2015.

Figure 1: Assessment of Alternative Sites, Options and Designations

Sources of information / sites / designations



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Part A: Providing for Offices, Industry, Storage and Distribution

Introduction

- 1.1 Employment uses (offices, research, industrial, storage and distribution, also called B-class uses) are a key component of the local economy and provide just under half of all the jobs in the Borough. It is therefore important to identify and provide a minimum area of employment land for the B-class uses throughout the plan period of the Dacorum Local Planning Framework, which runs to 2031. This will help to achieve full employment, while prevailing levels of out-commuting can continue. The minimum area of employment land includes land already used for B-class uses and proposed new sites.
- 1.2 The B-class uses, as defined in the Town and Country Planning Use Classes Order, cover the following uses:
 - B1: business use (sub-divided into B1(a) offices, B1(b) research and development and B1(c) light industry)
 - B2: general industry
 - B8: storage and distribution
- 1.3 Office jobs account for around a quarter of total jobs within Dacorum and are located mainly within the General Employment Areas (GEAs) and town centres. New office jobs will make a significant contribution to the borough's total additional jobs over the plan period. Industrial and storage floorspace will also continue to make an important contribution to the Borough's overall employment mix. This reflects the fact that the Maylands Business Park is the main industrial concentration in south west Hertfordshire and one of the main distribution centres around the M25 and southern part of the M1.
- 1.4 The Site Allocations Development Plan Document (DPD) excludes consideration of allocations and land designations within the area proposed to be covered by the East Hemel Hempstead Area Action Plan (AAP). This area largely equates to the Maylands Business Park. However, where the AAP contains important sites, these are cross referred to within the Site Allocations supporting text to ensure a comprehensive picture of sites and designations is provided for the Borough. This is particularly relevant with regard to planning for the B-class uses. Progress on the AAP remains dependent upon the content and scope of the St Albans emerging Local Plan. It may prove necessary to consider East Hemel Hempstead in the single Dacorum Local Plan, rather than through the AAP.

National Requirements

- 1.5 National advice on strengthening economic prosperity is provided through the National Planning Policy Framework (NPPF), with further guidance through the Planning Policy Guidance (PPG). The NPPF supersedes the advice formerly contained in Planning Policy Guidance Notes and Planning Policy Statements, most notably PPS4: Planning for Sustainable Economic Growth).

- 1.6 The NPPF requires local plans to set out strategic policies to deliver “the homes and jobs needed in the area” (paragraph 156). Local planning authorities are advised to prepare and maintain a robust evidence base, to understand both existing business needs and likely changes in the market (paragraph 160). This evidence base should be used to assess (paragraph 161):
- *The needs for land or floorspace for economic development, including both the quantitative and qualitative needs for all foreseeable types of economic activity over the plan period, including for retail and leisure development;*
 - *The existing and future supply of land for economic development and its sufficiency and suitability to meet the identified needs. Reviews of land available for economic development should be undertaken at the same time as, or combined with, Strategic Housing Land Availability Assessments and should include a reappraisal of the suitability of previously allocated land;*
- 1.7 More detailed Government guidance is provided in the Planning Policy Guidance (PPG). The following sections in the PPG are particularly relevant:
- ‘Housing and economic development needs assessments’ – this section includes advice on ‘methodology: assessing economic development and main town centre uses’; and
 - ‘Housing and economic land availability’.

Core Strategy and ‘Saved’ Policies

Core Strategy

- 1.8 Dacorum’s Core Strategy was adopted on 25 September 2013 and sets a clear strategic policy framework through which to progress the Site Allocations DPD.
- 1.9 Policies that relate directly to providing for offices, industry, storage and distribution are:
- CS14: Economic Development
 - CS15: Offices, Research, Industry, Storage and Distribution
- 1.10 Policy CS14 states that sufficient land will be allocated to accommodate growth in the economy of approximately 10,000 jobs between 2006 and 2031. Most employment generating development will be located in towns and local centres and General Employment Areas. Hemel Hempstead will be the main focus for new economic development and the regeneration of the Maylands Business Park and Hemel Hempstead town centre will be supported. Employment levels elsewhere in the Borough will be maintained to ensure a spread of job opportunities.
- 1.11 Policy CS15 states that a minimum area of land will be identified and retained for B-class uses. The minimum area of land comprises General Employment Areas (which will be protected for B-class uses), employment proposal sites,

town and local centres and employment areas in the Green Belt. The policy sets the following targets for the 2006-2031 plan period:

- Around 131,000 sq. metres (net) additional office floorspace; and
- Nil net change in floorspace for industry, storage and distribution.

1.12 The jobs growth target in Policy CS14 and the floorspace figures in Policy CS15 are as recommended by the Council's consultants in the technical studies (see paragraphs 1.24-1.39 below).

1.13 Several other Core Strategy policies are also relevant, including Policy NP1: Supporting Development, CS1: Distribution of Development, CS2: Selection of Development Sites, CS4: The Towns and Large Villages, CS33: Hemel Hempstead Town Centre and CS34: Maylands Business Park.

1.14 Core Strategy paragraph 12.9 states that the majority of the employment jobs will be directed to the Maylands Business Park. The business park includes the Maylands Gateway site, which will provide a prominent new office-led strategic employment location. The Face of Maylands area will also be an important office location. Paragraph 12.14 refers to the significance of Maylands as a location for industrial and storage and distribution uses. Core Strategy Figure 18 states that Maylands Gateway offers around 29.7 hectares of developable land and uses suited to the area will be primarily HQ offices, conference facilities and a hotel. There may also be opportunities for other development that accords with its high status and green character.

Saved Local Plan Policies

1.15 The Core Strategy policies are complemented by 'saved' policies from the Dacorum Borough Local Plan 1991-2011. Relevant policies include:

- 31 – General Employment Areas
- 32 – Employment Areas in the Green Belt
- 33 – Conversion of Employment Land to Housing and Other Uses
- 34 – Other Land with Established Employment Generating Uses
- 37 – Environmental Improvements

1.16 It is proposed that Policies 32 and 33 are superseded by the Site Allocations DPD. The other policies listed above will be revised and superseded through the East Hemel Hempstead Area Action Plan or the single Local Plan for Dacorum.

1.17 The Employment section of the Local Plan also contains a 'Schedule of Employment Proposal Sites'.

Other Relevant Documents Produced by the Council

Maylands Masterplan and Maylands Gateway Development Brief

1.18 Detailed guidance on the future planning of the Maylands Business Park can be found in the Maylands Master Plan, which was adopted by the Council as a planning policy statement in June 2007:

<http://www.maylands.org/sitefiles/MaylandsMP.pdf>

1.19 The Master Plan divides the business park into a number of character areas, where different types of employment development should be encouraged. One of the character areas is the Maylands Gateway site, located on the A414 Breakspear Way, close to M1 Junction 8. Maylands Gateway is Dacorum's main employment development site. The Master Plan proposes a first rate business park on the Gateway site and states that there is potential for around 130,000 sq. metres of office space.

1.20 Further guidance on the future planning of the Gateway site can be found in the Maylands Gateway Development Brief. A revised version of the brief was approved by the Council as a planning policy statement in July 2013:

[http://web.dacorum.gov.uk/docs/default-source/regeneration/final-masterplan-incl.-design-appendix---adopted-jan-13-\(small\).pdf?Status=Master&sfvrsn=0](http://web.dacorum.gov.uk/docs/default-source/regeneration/final-masterplan-incl.-design-appendix---adopted-jan-13-(small).pdf?Status=Master&sfvrsn=0)

1.21 The revised brief gives increased flexibility over the type of jobs to be provided, including high quality B8 developments, to reflect current economic circumstances.

Hemel Hempstead Town Centre Masterplan

[http://web.dacorum.gov.uk/docs/default-source/regeneration/final-masterplan-incl.-design-appendix---adopted-jan-13-\(small\).pdf?Status=Master&sfvrsn=0](http://web.dacorum.gov.uk/docs/default-source/regeneration/final-masterplan-incl.-design-appendix---adopted-jan-13-(small).pdf?Status=Master&sfvrsn=0)

1.22 The Town Centre Masterplan was approved by the Council in January 2013. It was adopted as a supplementary planning document in September of that year, to coincide with adoption of the Core Strategy. One of the regeneration objectives in the Masterplan (paragraph 3.4.1) states that the Council aims to assist the town centre in reaching its economic potential.

1.23 The Masterplan does not contain any specific proposals for major new offices or other types of B-class development. However, it identifies several sites with potential for a wide range of different types of jobs to be created. The main potential is within the following zones:

- the Gade Zone (section 5.2.1 of the Masterplan). The proposals for this zone include a new college, food store and Public Service Quarter; and

- the Hospital Zone (section 5.4.1), where the proposals include a reconfigured hospital, a new primary school and a wider mix of uses in the Paradise Employment Area.

Summary of Advice in Technical Studies on Employment Issues

1.24 The employment evidence base for Dacorum comprises three studies, all produced by Roger Tym & Partners:

- The *Hertfordshire London Arc Jobs Growth and Employment Land Study* (March 2009), a strategic sub-regional study which advised on employment land provision across seven districts, covering most of Hertfordshire including Dacorum;
- The *South West Hertfordshire Employment Land Update* (June 2010), a local study that advised on the delivery of the broad strategy in Dacorum and Three Rivers Districts; and
- The *Dacorum Employment Land Update* (July 2011), which recommended updated quantitative targets for the provision of employment land in the plan period to 2031.

1.25 A summary of the key points in these documents is provided below:

The Hertfordshire London Arc Jobs Growth and Employment Land Study (March 2009)

<http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/evidence-base/london-arc-employment-space-study>

1.26 The London Arc Study included an assessment of the industrial/warehouse and office markets in the study area. It also looked at employment sites and areas and forecasts of labour demand and supply. The study put forward provisional targets for employment floorspace change in each district, but advised the authorities that they might choose to amend these figures in the light of local knowledge and policy priorities.

The South West Hertfordshire Employment Land Update (June 2010)

<http://www.dacorum.gov.uk/docs/default-source/planning-development/spatialplanning-10.07.13-sw-herts-employment-land-update-2010.pdf?Status=Master&sfvrsn=0>

1.27 This study advised Dacorum and Three Rivers Councils on employment land policies for inclusion in their emerging development plans. In particular, the study considered the quantity, mix and geographical spread of employment land that should be provided. Advice was given on what new sites (if any) should be identified for employment development and what existing employment sites (if any) should be allowed to transfer to other uses.

1.28 Paragraphs 4.59-4.62 set out the consultants' initial proposals for new sites (in addition to existing commitments) and for releasing existing sites. The recommendations included:

- the release of around 30,000 sq. metres of existing industrial/warehousing floorspace on older/poorer employment sites; and
- major new office development and some industrial/warehousing floorspace on the Maylands Gateway site.

1.29 The study also included forecasts of employment change in the Borough during the plan period. However, these forecasts were superseded by those in the 2011 Update (see below).

The Dacorum Employment Land Update (July 2011)

[http://www.dacorum.gov.uk/docs/default-source/planning-development/employmentland-update-\(pdf-334kb-opens-in-a-new-window\).pdf?sfvrsn=0](http://www.dacorum.gov.uk/docs/default-source/planning-development/employmentland-update-(pdf-334kb-opens-in-a-new-window).pdf?sfvrsn=0)

1.30 The 2011 study updated the recommended quantitative targets for the provision of employment land in Dacorum to 2031. This update was needed to take fuller account of the recession and also because of the Government's decision to abolish the regional spatial strategies.

1.31 For this study, a new local economic forecast was commissioned from Oxford Economics, based on the East of England Forecasting Model. The modelling assumed a housing target in Dacorum of 400 homes a year. This is slightly lower than the target of 430 a year in the adopted Core Strategy. However, as noted in paragraph 4.5 of the study, this difference is too small to affect the conclusions and recommendations. The forecast also assumed a slight increase in net out-commuting from the borough from 5,100 to 6,700 workers by 2031 (see paragraphs 4.11-4.14 in the study).

1.32 The revised economic forecast estimated a job growth of some 9,700 in Dacorum over the plan period, broken down as follows (see Table 5.1 in the 2011 Update):

	Employment change 2006-2031
Industry and warehousing	-3,441
Offices	7,284
Non-B jobs	5,863
All jobs	9,702

1.33 Given the above forecast, the 2011 Update (paragraph 6.3) suggested that the Core Strategy should aim to provide land to accommodate around 10,000 jobs in the 2006-2031 plan period. This advice has been incorporated into Core Strategy Policy CS14.

1.34 Around 60% of the estimated employment growth is in non-B class uses, such as hotels and catering, construction, education, healthcare, retailing and leisure. Therefore, appropriate allocations for non-B class uses are included in the Site Allocations Development Plan Document and, further such allocations maybe made in the East Hemel Hempstead Area Action Plan or single Local Plan.

1.35 Paragraph 5.5 in the 2011 Update translated the employment change forecasts into the following forecasts of demand for B-class floorspace:

	Net floorspace change sq. m (2006-2031)
Industry and warehousing	-30,045
Offices	131,103

1.36 Paragraphs 5.7-5.17 in the 2011 Update provided advice on floorspace targets for B-class uses. The study looked at the planned supply of land i.e. completions 2006-2011, outstanding permissions, allocations in the Local Plan and proposals made in the 2010 study (see above). The planned supply amounted to a net floorspace gain of 34,000 sq. metres for industry/warehousing and 145,000 sq. metres for offices. These figures included an assumption of 122,000 sq. metres of offices and 18,500 sq. metres of industrial/warehousing space on the Maylands Gateway site.

1.37 In relation to the forecasts of demand for B-class floorspace, there was therefore a large oversupply of planned industrial/warehousing space and a small oversupply of offices. However, the study explained why the calculations for industry and warehousing were considered to be pessimistic and subject to a large margin of error. The consultants concluded that the market was roughly in balance and that the Council's land provision target for industry/warehousing over the plan period should be zero net change. This recommendation has been taken on board by the Council in Core Strategy Policy CS15.

1.38 With regard to offices, the consultants suggested that the Council should adopt the figure of 131,000 sq. metres of net additional floorspace as a land provision target for the Core Strategy. However, they advised that:

"...planning policy should allow for the possibility that the forecast demand may not materialise. Therefore, land supply and the infrastructure investment needed to support office development should be phased over the plan period; targets and allocations should be reviewed regularly in the light of actual take-up, market conditions and the latest economic forecasts; and there may be managed release of office sites which are no longer attractive, viable or suitable for offices."

1.39 In view of the above, Core Strategy Policy CS15 sets an office floorspace target for 2006-2031 of around 131,000 sq. metres of additional floorspace, whilst paragraph 12.7 of the Core Strategy refers to the consultants' advice that this level of growth may not materialise.

Issues Raised in Responses to 2006 and 2008 Consultations

1.40 Initial stages of consultation on the Site Allocations DPD took place in 2006 and 2008. The issues raised in the response to these consultations are considered below. In 2014, the Council consulted on the Pre-Submission version on the Site Allocations. This was followed in 2015 by consultation on Focused Changes to the Pre-Submission document. Consultation responses to the 2014 and 2015 documents are considered in paragraphs 1.95-1.98 below.

Site Allocations Issues and Options Paper 2006

1.41 The first consultation stage in the Site Allocations DPD process was the 2006 Issues and Options consultation:

<http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/local-planning-framework/site-allocations/site-allocations-issues-options-2006>

1.42 The consultation paper looked at the issues which needed to be considered when identifying land for different activities and suggested a number of options for tackling these issues. The document covered a wide range of topics through a series of questions. It looked at both specific sites that may be promoted for particular uses and broader designations.

1.43 The following issues were raised and questions posed on employment in the consultation paper:

Issue 1 – Employment Area Boundaries

Q18: Should any changes be made to the detailed boundaries of the existing General Employment Areas

Issue 2 – Types of Employment Designations

Nash Mills General Employment Area

Option 1: retain existing General Employment Area designation over the whole site

Option 2: redesignate for residential use

Option 3: redesignate for a mix of employment and residential uses

Q19: Which of the above options do you support for the Nash Mills General Employment Area?

Bourne End Mills

Option 1: site retained for current employment use

Option 2: site redeveloped for residential use

Option 3: a mix of the above

Q20: Which of the above options do you support for the Bourne End Mills site?

Apsley Paper Trail

Option 1: retain current Local Plan designation for the Paper Trail

Option 2: allow redevelopment of part of site for residential purposes

Option 3: allow redevelopment of part of site for non-residential/employment purposes

Q21: Which of the above options do you support for the Paper Trail site?

Issue 3 – Unimplemented Employment Proposals at Miswell Lane, Tring

Option 1: site retained for employment use

Option 2: site redesignated for residential use

Option 3: site redesignated for residential use with a new reserve of land allocated to enable the expansion of the GEA westwards

Q22: Which of the above options do you support for the undeveloped employment land at Miswell Lane Tring?

Issue 4 – Other Potential Employment Sites

Q23: Are there any other areas of land that you would like us to consider designating for employment uses?

Issue 5 – Conversion of Employment Land to Other uses

Q24: Should any changes be made to the boundaries of the above sites?

Issue 6 – Potential Locations for Live/Work Uses

Q25: Where do you consider Live/Work units could be successfully accommodated?

- Maylands business area
- Other locations

1.44 The 2006 Issues and Options consultation included a Schedule of Site Appraisals, which formed part of the background technical work to support the Site Allocations DPD. The schedule included a number of sites in existing employment use that were being considered for possible reallocation for other uses, such as housing. Most of the sites concerned are shown in the Dacorum Borough Local Plan:

- in Policy 31 as General Employment Areas;
- in Policy 32 as employment areas in the Green Belt;
- in Policy 33 (conversion of employment land to housing and other uses); or
- on the Schedule of Employment Proposal Sites.

1.45 All the sites looked at in the 2006 document for possible reallocation to non-employment uses are considered below in the section of this Issues Paper on 'Review of Employment Areas and Sites.' The 2006 document also assessed

the possibility of allocating non-employment uses on some existing employment sites not protected for employment purposes by the Local Plan.

1.46 No potential new employment areas or sites were considered in the 2006 document, except in the area to be covered by the East Hemel Hempstead Area Action Plan.

1.47 The Site Allocations Consultation Report Volume 1 summarised the response to the 2006 consultation document and the Council's decisions on which potential allocations to consider further:

<http://www.dacorum.gov.uk/docs/default-source/planning-development/spar-12.07.27-siteallocationsio2006responsesummary-v3.pdf?Status=Master&sfvrsn=0>

1.48 The Council's initial conclusions on General Employment Areas were set out in the Consultation Report as follows (paragraph 2.36):

“There is merit in exploring changes to the boundaries to GEAs to allow for their expansion. This would allow flexibility to adjust to changes in employment growth in the borough and to meet the needs of specific settlements. Bourne End Mills GEA now benefits from an approved scheme granted in 2010, which will dictate future planning options on the site. There is no clear direction given as to which option should be pursued on the Paper Trail site and land adjoining Icknield Way GEA. However, opportunities for live/work units within the Maylands business area are clearly popular, and could be explored through the East Hemel Hempstead Area Action Plan.”

1.49 A summary of the response to the questions posed on employment in the Consultation Report together with the actions to be taken by the Council can be found in pages 35-41 of the report. An overview is provided in Table 1 below:

Table 1: Questions on Employment in 2006 Consultation: Summary of Response and Actions

Question	Subject	Summary of response and actions
18	Boundaries of GEAs	Response: most did not consider changes necessary. Actions: no action required.
19	Nash Mills GEA	Response: 60% supported a mix of employment and residential uses. Actions: give further consideration to a mixed use redevelopment scheme.
20	Bourne End Mills	Response: most supported continued employment use or an employment/housing mix. Actions: consider Option 1 (employment) further.

21	Paper Trail site	Response: most favoured retaining Local Plan designation or allowing housing on part of site. Actions: consider options further.
22	Undeveloped employment land at Miswell Lane, Tring	Response: slight majority for residential use. Actions: consider employment needs in Tring in greater detail.
23	Other areas	Response: a few areas suggested, but most already allocated for employment. Actions: no action required.
24	Boundaries of employment sites proposed for housing	Response: most favoured no change to boundaries. Actions: retain sites, but update where appropriate.
25	Location of live/work units	Response: most favoured live/work units at Maylands. Actions: consider further the market for live/work and whether Maylands is an appropriate location.

Site Allocations Issues and Options Paper 2008

1.50 In 2008, the Council published the Site Allocations Supplementary Issues and Options Paper:

<http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/local-planning-framework/site-allocations/site-allocations-2008>

1.51 This paper consulted chiefly on new sites and designations that had emerged since the 2006 consultation. It did not pose any specific questions about employment. The Schedule of Site Appraisals accompanying the 2008 consultation paper included a few further possible losses of employment land, most of which are currently protected for employment uses through Local Plan Policy 31 (see section on 'Review of Employment Areas and Sites' below).

1.52 The only potential new employment area or site assessed in the 2008 document was site KL/c2 (Rectory Farm, Rectory Lane, Kings Langley). This Green Belt site was assessed for possible employment/community use.

1.53 The Site Allocations Consultation Report Volume 2 summarised the response to the 2008 consultation document and the Council's decisions on which potential allocations to consider further:

<http://www.dacorum.gov.uk/docs/default-source/strategic-planning/site-allocations-report---housing-and-other-issues.pdf?sfvrsn=0>

1.54 Page 50 in the Consultation Report indicated that the Rectory Farm site should not be considered further in the Site Allocations process.

Sustainability Appraisal

1.55 Separate sustainability appraisal reports on the 2006 and 2008 Issues and Options documents have been prepared on an independent basis by the Council's consultants, C4S and Halcrow. The sustainability reports include an initial assessment of the sustainability conclusions for each site, which support the Council's own assessment. In addition, the Pre-Submission Site Allocations document in 2014 was accompanied by a full Sustainability Appraisal Report, whilst a Sustainability Appraisal Addendum Report accompanied the Focused Changes in 2015.

Monitoring Information

1.56 The importance of monitoring should be emphasised and the Council regularly monitors what is happening on the ground. This is done annually through the Employment Land Position Statement (ELPS) and the Authority Monitoring Report (AMR).

1.57 The ELPS includes information on all B-class floorspace commitments (i.e. with planning permission and either not started or under construction). It also gives information on completions over the last year. The current version of the ELPS sets out the position at April 2015:

<http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning>

1.58 The AMR enables the Council to keep a check on the health of the economy and progress towards reaching jobs and floorspace targets, and also assess whether the targets need to be reviewed and/or updated in the future. It incorporates information from the ELPS. The current AMR provides information for the monitoring year 2014/15 and also for 2006-2015 (as 2006 is the start date for the Core Strategy plan period):

<http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning>

1.59 Monitoring information on Core Strategy Policy CS14 is provided in paragraphs 6.1-6.9 in the AMR, whilst paragraphs 6.10-6.25 relate to Policy CS15.

1.60 The following conclusion is reached in relation to the target in Policy CS14 for 10,000 additional jobs over the 2006-2031 plan period:

“Job numbers increased by 4,000 between 2013 and 2014, which puts the Borough on target to achieve the Core Strategy jobs growth target. The jobs growth target is seen as realistic and achievable, particularly given the Council's proactive approach towards promoting economic development.”

1.61 AMR paragraph 6.19 shows the main commitments for losses and gains of employment floorspace, using information from the April 2015 ELPS. All the main commitments involve redevelopment of previously developed land and most of them are located on the Maylands Business Park in Hemel Hempstead. Only three commitments involve a net gain of over 10,000 sq. metres of B-class floorspace.

1.62 Apart from the information from the ELPS, the AMR (paragraph 6.21) also takes account of other proposed changes in employment floorspace. There are several other proposals for losses and gains of employment land in Dacorum and by far the largest development proposal is at the Maylands Gateway site. The most significant proposals are as follows:

- **Maylands Gateway, Hemel Hempstead** (see paragraphs 1.14, 1.18-1.21 and 1.36 above). It is estimated in the AMR that this site will accommodate 28,000 sq. metres of offices and 60,000 sq. metres of industrial, storage and distribution space (see Appendix 3 in this Issues Paper for a further update on the estimated capacity of Maylands Gateway).
- **Frogmore Road General Employment Area, Apsley, Hemel Hempstead.** The Pre-Submission Site Allocations document (see 'Schedule of Housing Proposals and Sites') proposes housing development on 3 hectares of this employment area, resulting in the loss of an estimated 12,000 sq. metres of B-class floorspace.

1.63 The AMR contains the following estimate of the total change in B-class floorspace over the 2006-2031 Core Strategy plan period, taking account of completions 2006-2015, current commitments (allowing for commitments that are unlikely to be implemented) and other proposed changes:

Table 2: Estimated B-class floorspace change 2006-2031 (sq. metres)

	Offices	Industry, storage and distribution	B-class total
2006-2015	-59,300	-34,700	-94,000
2015-2031	11,500	86,100	97,600
Total 2006-2031	-47,800	51,400	3,600

1.64 Given this information, the following broad conclusions were drawn in AMR paragraph 6.24 regarding the employment land targets in Core Strategy Policy CS15:

- **Offices:** A substantial net loss of office floorspace is expected over the Core Strategy plan period, although a modest net floorspace increase between 2015 and 2031 seems likely. It appears highly probable that the major floorspace increase (130,000 sq. metres 2006-2031) proposed in Policy CS14 will not be achieved. The main reason is that the scale of office development on the Maylands Gateway site is now

expected to be far lower than envisaged when the Core Strategy was produced (whilst warehousing development will probably be much higher). Another important factor is the high level of office to residential conversions granted prior approval over the last two years.

- **Industry, storage and distribution:** a large increase in floorspace is forecast between 2006 and 2031, rather than the nil net change proposed in Policy CS15. Following a net loss of space between 2006 and 2015, a substantial increase is likely over the remainder of the plan period. The main reason is that it is now probable that a significant amount of warehousing floorspace will be built on the Maylands Gateway site

Review of Employment Areas and Sites

- 1.65 A review of employment areas and proposed sites within the Borough has been carried out. This review has sought to ensure that sufficient good quality employment land is available to meet the Core Strategy's employment targets (for offices and industrial, storage and distribution floorspace). The scope to reallocate some employment land for housing development has also been considered. This work has also sought to ensure the uses permitted in designated employment areas remains appropriate in terms of their character and current market demands and supports growth in local economic prosperity.
- 1.66 The Council considers that there is no need to allocate new employment sites in the Site Allocations DPD, over and above those already proposed. This conclusion reflects the advice in the technical studies, the outcome of the 2006 and 2008 Site Allocations Issues and Options consultations and the monitoring findings. A key factor is the conclusion in the AMR is that the Borough is on target to achieve the Core Strategy jobs growth target. Another important factor is the large amount of land available for employment development in the Maylands Business Park, particularly on the Maylands Gateway site (which does not feature in the Site Allocations, but will be covered by the East Hemel Hempstead Area Action Plan or the single Local Plan).
- 1.67 As a result, there has not been a need to look for potential new employment sites in the Site Allocations DPD. Therefore, the main emphasis has been on retaining existing employment areas and sites, but considering whether some should be reduced in size or deleted, to reflect site specific factors.
- 1.68 Appendix 1 contains the review of existing employment areas and proposed sites. It looks in turn at:
- the General Employment Areas (GEAs) listed in Local Plan Policy 31
 - the employment areas in the Green Belt (Local Plan Policy 32)
 - Local Plan Policy 33 sites (conversion of employment land to housing and other uses)
 - sites on the Local Plan's Schedule of Employment Proposal Sites
 - other areas and sites assessed in the SW Hertfordshire Employment Land Update (2010)

1.69 For each location, the review considers whether the existing proposals should be deleted, whether their boundaries should be changed and whether the types of employment development proposed should be amended. The review reflects the particular circumstances of each employment area and site. It also takes account of the site specific recommendations in the SW Hertfordshire Employment Land Update (2010) and any recent changes in circumstances.

1.70 The right hand column in the schedules in Appendix 1 sets out the main issues to be addressed in the Site Allocations DPD. This column also includes a recommended way forward. No recommendations are made for the Maylands Business Park, as decisions will be made in the East Hemel Hempstead Area Action Plan or the single Local Plan.

1.71 The main conclusions of the review are summarised below:

General Employment Areas (GEAs) listed in Local Plan Policy 31

1.72 GEAs play a major role in the local economy and provide B-class employment floorspace in a range of locations and with different sized units. It is important that B-class uses on the GEAs are protected.

1.73 The principal GEAs are located in the three towns. Maylands Business Park in Hemel Hempstead contains the largest concentration of employment floorspace in the Borough. The East Hemel Hempstead Area Action Plan or single Local Plan will guide the regeneration and expansion of the business park, and will reflect the character areas identified in the Maylands Masterplan.

1.74 The Council's general approach is to retain the GEAs and make changes only where there is clear justification. The main changes recommended to the GEAs compared with Policy 31 in the Dacorum Borough Local Plan 1991-2011 are:

- Frogmore GEA, Hemel Hempstead: most of the GEA should be reallocated for housing development, because of the restricted access and the scope for housing;
- Nash Mills GEA, Hemel Hempstead: should be deleted because the site is being redeveloped for housing; and
- Paradise GEA, Hemel Hempstead: should be reclassified as a mixed use proposal and reduced in size, due to its inclusion in the town centre, the fact that a key part of the site is being redeveloped for housing and as there is further scope for additional limited housing development as part of a mixed use scheme.

1.75 Table 3 below shows those GEAs where deletion or amended boundaries are recommended in Appendix 1:

Table 3: General Employment Areas recommended for deletion or amended boundaries

GEA	Recommended way forward
Billet Lane, Berkhamsted (see Figure 1 in Appendix 2)	<ul style="list-style-type: none"> • Remove High Street frontage from GEA (allocate proposed Lidl supermarket site for out of centre retail and housing). • Retain northern area in the GEA.
Paradise, Hemel Hempstead (see Figure 2 in Appendix 2)	<ul style="list-style-type: none"> • Allocate most of this area as a mixed use proposal (B1 business led development and housing). • Exclude the Royal Mail site (housing and self-storage building under construction) and land in Park Lane within Hospital site.
Apsley Mills, Hemel Hempstead (see Figure 3 in Appendix 2)	<ul style="list-style-type: none"> • Retain the Cottage Building and Mercedes-Benz car dealership in GEA. • Delete rest of GEA - most has been redeveloped for housing, public house and hotel; allocate land next to Homebase for housing.
Corner Hall, Hemel Hempstead (see Figure 4 in Appendix 2)	<ul style="list-style-type: none"> • Delete the car wash site by the Plough Roundabout (allocate for housing) and the mixed use area in Lawn Lane from the GEA. • Retain rest of GEA.
Frogmore, Hemel Hempstead (see Figure 5 in Appendix 2)	<ul style="list-style-type: none"> • Retain Frogmore Mill in GEA. • Reallocate rest of GEA for housing.
Nash Mills, Hemel Hempstead (see Figure 6 in Appendix 2)	<ul style="list-style-type: none"> • Delete GEA, as site is being redeveloped for housing.
Two Waters, Hemel Hempstead (see Figure 7 in Appendix 2)	<ul style="list-style-type: none"> • Remove part of GEA, including the National Grid gas works site (allocate for housing) and the Aldi supermarket. • Retain rest of GEA.
Icknield Way, Tring (see Figure 8 in Appendix 2)	<ul style="list-style-type: none"> • Remove eastern part of GEA in Miswell Lane from GEA (not currently in employment use). • Retain rest of GEA. • Extend GEA westwards into Local Allocation LA5 site (west of Tring).
Akeman Street, Tring (see Figure 9 in Appendix 2)	<ul style="list-style-type: none"> • Remove haulage yard in Langdon Street from GEA (allocate for housing). • Retain rest of GEA.

Markyate (Hicks Road) (see Figure 10 in Appendix 2)	<ul style="list-style-type: none"> • Remove most of GEA (Core Strategy site SS2 - being redeveloped for housing and other uses). • Retain Sharose Court in GEA. • Add adjacent employment building in London Road to GEA.
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Employment Areas in the Green Belt (Local Plan Policy 32)

1.76 Local Plan Policy 32 identifies two employment areas in the Green Belt, namely, Bourne End Mills and Bovingdon Brickworks. These sites were selected because they are substantial in size, they contain a significant amount and scale of built development, and they can accommodate further limited development without prejudicing Green Belt objectives. Bourne End Mills and Bovingdon Brickworks are also designated as major developed sites in the Green Belt (see Local Plan Policy 5 and Core Strategy Table 2).

1.77 Table 4 below shows boundary changes at the employment areas in the Green Belt recommended in Appendix 1:

Table 4: Amended boundaries recommended at employment areas in the Green Belt

Employment Area in the Green Belt	Recommended way forward
Bourne End Mills (see Figure 11 in Appendix 2)	<ul style="list-style-type: none"> • Amend the boundary of the Employment Area in the Green Belt to reflect the extent of development shown in the planning permission for redevelopment of the site, plus land to be kept open in the south west part of the site.
Bovingdon Brickworks (see Figure 12 in Appendix 2)	<ul style="list-style-type: none"> • Retain as an Employment Area in the Green Belt, but extend the boundary to better reflect the current extent of employment uses.

Local Plan Policy 33 sites (conversion of employment land to housing and other uses)

1.78 Saved Local Plan Policy 33 identifies five sites in employment use, where housing development is encouraged. It is not recommended in Appendix 1 that any of these sites should be proposed for employment uses in the Site Allocations DPD. This reflects the current position on these sites:

- Housing development has been completed on two sites.
- On a third site, housing has been built on part and is under construction on the remainder.
- The other sites (Ebbens Road, Hemel Hempstead and Western Road, Tring) have been partly redeveloped for housing and are still partly in

employment use. It is recommended that the land still in employment use on these sites should be allocated for housing.

Sites on the Local Plan's Schedule of Employment Proposal Sites

1.79 The Schedule of Employment Proposal Sites in the Local Plan contains seven sites proposed for B-class development. The current position on these sites is summarised below:

- Employment development has been completed on three sites (E1, E3 and E5).
- No recommendations are made for sites E2 and E4 as they will be covered by the East Hemel Hempstead Area Action Plan or the single Local Plan.
- Site TWA7 (former John Dickinsons, London Road, Hemel Hempstead) covers the same area as the Apsley Mills GEA, much of which has been developed or is proposed for non-employment uses. None of this land is now available for new employment development.
- Site E6 (Miswell Lane Tring) has not been developed and forms part of the eastern section of the Icknield Way GEA, which is recommended for deletion (see Table 3 above).

1.80 In view of the above, it is not recommended in Appendix 1 that any of these sites should be included on the Schedule of Employment Proposal and Sites in the Site Allocations DPD.

Other areas and sites assessed in the SW Hertfordshire Employment Land Update (2010)

1.81 Appendix 2 in the SW Hertfordshire Employment Land Update (Roger Tym & Partners, June 2010) assessed four sites not included in the Local Plan. Appendix 1 to this Issues Paper does not recommend that the Site Allocations DPD should propose employment uses on any of the four sites. This reflects the current position on these sites:

- Two of these sites (Newground Farm in Aldbury and Boxted Farm at Potten End) are too small to be allocated for employment uses in the Site Allocations DPD.
- Woodwells Farm is within the proposed East Hemel Hempstead Area Action Plan area.
- Sunderlands Yard, Kings Langley: the Local Plan shows this existing unallocated employment area as located in a residential area. This means that the existing uses can remain, but also that housing development is acceptable in principle. It is recommended that this should continue to be the case in the Site Allocations DPD.

1.82 The Employment Land Update 2010 also assessed the Borough's three town centres. In Appendix 1 it is not recommended that any new site specific employment proposals in the town centres should be included in the Site Allocations DPD. This conclusion accords with the advice in the SW Hertfordshire Employment Land Update, which proposed no new sites for office

development. However, it is recommended that the northern part of the Gade Zone and part of the existing Paradise GEA in Hemel Hempstead town centre should be shown as mixed use allocations, including some B1 development.

Employment Land Supply (Reflecting the Review of Employment Areas and Sites)

- 1.83 Having carried out the review of employment areas and sites, it is now important to consider whether the recommendations in the review will leave enough land for B-class uses to ensure that the employment floorspace targets in Core Strategy Policy CS15 can be met.
- 1.84 The current edition of the Authority Monitoring Report (see paragraph 1.58 above) provides information on employment land supply in Dacorum at the end of March 2015, whilst the Employment Land Position Statement 39 (see paragraph 1.57) covers all sites that have been completed in the 2014-2015 monitoring year and those with planning permission for gains of employment floorspace at 31 March 2015.
- 1.85 Appendix 3 in this Issues Paper provides information on major sites (i.e. sites where there is potential for gains or losses of over 1,000 m² of B-class floorspace) as at January 2016. This Appendix:
- reflects the recommendations contained in the review of employment areas and sites (see Appendix 1).
 - Includes all the major sites with planning permission at 31 March 2015 and any sites granted permission since then.
 - provides an up-to-dated estimate of potential floorspace change on major sites that do not have planning permission.
- 1.86 In May 2013, the Government introduced a temporary change to the General Permitted Development Order, which until May 2016 allows changes of use from offices to housing without the need for planning permission. Such proposals must go through a prior approval process, but prior approval cannot be refused on the basis of land use policies. The Government has now announced its intention in the Housing and Planning Bill to make this change permanent. It is also proposed to expand the prior approval regime to include demolition and rebuilding of office buildings for new housing, and conversions of B1(c) light industrial buildings to housing.
- 1.87 Paragraph 6.18 in the AMR states that over the 2013-2015 period, the amount of office floorspace given prior approval for conversion to housing is nearly 19,500 sq. metres. Further prior approvals granted since March 2015 mean that the figure is probably now over 26,000 sq. metres. Proposals involving the loss of over 1,000 sq. metres of offices are shown in Appendix 3. However, it remains uncertain how many of the schemes approved under the prior approval regime will be implemented and whether many further schemes will follow.
- 1.88 The information on major sites and other sites is summarised in Table 5 below (the floorspace figures are given in sq. metres).

Table 5: Dacorum Employment floorspace calculations January 2016

	Offices ¹	Industrial/ Warehousing ¹	Total
Scenario 1			
1. Completions 2006-2015 ²	-59,276	-34,728	-94,004
2. Floorspace change 2015-2031 from commitments on small sites	334	499	833
3. Major sites: estimated completions 2015-2031	9,425	103,414	112,839
4. Total estimated floorspace change 2015-2031 (rows 2+3)	9,759	103,913	113,672
5. Total estimated floorspace change 2006-2031 (rows 1+4)	-49,517	69,185	19,668

1.89 The estimates in Table 5 are not consistent with the targets in Core Strategy Policy CS15 of around 131,000 sq. metres of additional office floorspace and nil net change in industrial, storage and distribution floorspace.

1.90 Nevertheless, the Council does not consider that there would necessarily be an employment land supply problem. The reasons for this conclusion are:

- If market demand turns out (as now expected) to be mainly for industrial/warehousing development rather than offices, meeting this demand would comply with the NPPF (paragraph 21, bullet 3) which advises that Local Plans should:

“support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances.”

- Although a reduction of nearly 50,000 sq. metres in office floorspace is forecast during the 2006-2031 plan period, it is important to note that a loss of over 59,000 sq. metres has already taken place between 2006 and 2015. An increase of around 10,000 sq. metres is forecast over the remainder of the plan period.
- Despite the fall in B-class floorspace since 2006 and the length and depth of the recent recession, the local economy is relatively healthy. The Authority Monitoring Report (see paragraph 1.58 above) shows that the number of jobs

¹ Offices = B1(a) offices and B1(b) research and development; industrial/warehousing = B1(c) light industry, B2 general industry and B8 storage and distribution.

² Source: Dacorum Authority Monitoring Report 2014/15

in the Borough (as measured by the Annual Business Inquiry) increased by 3,900 between 2006 and 2014. The AMR concludes that the Borough is on target to achieve the Core Strategy jobs growth target. Also, unemployment is very low and is well below the regional average.

- The Employment Land Review 2011 (see paragraphs 1.30-1.39) advised that the forecast demand for offices may not materialise. Therefore, this report recommended that targets and allocations should be reviewed regularly during the plan period in the light of actual take-up, market conditions and the latest economic forecasts. The consultants advised that there may be a need for managed release of sites which are no longer attractive, viable or suitable for offices.
- Declining office employment densities may reduce the need for additional office floorspace in the light of changing working practices. This issue was addressed in paragraph 6.9 of the Employment Land Review 2011. The consultants stated that an argument could be made for reducing assumed floorspace per worker from 18 sq. metres to 16 or conceivably less, probably in stages over the plan period. However, they advised against changing the assumption at that time. This issue is being considered further in the technical work for the single Local Plan and it is likely that lower floorspace per worker assumptions should be used, due to practices such as hot desking and remote and flexible working.

1.91 After considering all the above factors, the Council concludes that sufficient land is available to meet the employment floorspace targets in Core Strategy Policy CS15, whilst complying with the requirements of the NPPF to be flexible in terms of responding to changes in market demands.

1.92 It should also be borne in mind that the single Local Plan will include revised employment floorspace targets. Adoption of the Single Local Plan is programmed in the Local Development Scheme for March 2018.

Conclusions on Questions Posed in 2006 Consultation Document

1.93 The questions on employment posed in the 2006 Site Allocations Issues and Options consultation document are set out above, in the section on 'Issues raised in consultation responses'. Also, Table 1 in this section summarises the consultation response and the main actions to be taken by the Council.

1.94 Table 6 below now reaches conclusions on these questions. The conclusions reflect the advice in the technical studies, the outcome of the 2006 and 2008 Site Allocations Issues and Options consultations, the monitoring findings, the review of employment areas and sites, and the updated employment land supply calculations.

Table 6: Questions on Employment in 2006 Consultation: Conclusions

Question	Subject	Conclusions
18	Boundaries of GEAs	Delete GEAs or amend their boundaries only where there is clear justification (see Table 3 above and Appendix 1 for proposed changes).
19	Nash Mills GEA	Delete GEA, as site is being redeveloped for housing (see Appendix 1 and Figure 6 in Appendix 2).
20	Bourne End Mills	Retain as an Employment Area in the Green Belt, but amend the boundary to reflect the extent of development shown in the planning permission for redevelopment of the site (see Appendix 1 and Figure 11 in Appendix 2).
21	Paper Trail site	Question 21 relates to part of the Apsley Mills GEA. The proposals for this GEA involve retaining part of the GEA (including the Paper Trail's offices) and also some further housing development (see Appendix 1 and Figure 3 in Appendix 2). The Paper Trail has now opened a visitor attraction in Frogmore Mill in the Frogmore GEA (see Appendix 1 and Figure 5 in Appendix 2).
22	Undeveloped employment land at Miswell Lane, Tring	<p>Reallocate for housing, as:</p> <ul style="list-style-type: none"> • Miswell Lane is a residential road. • The Miswell Lane/ Icknield Way road junction is poor. • It is unlikely that access could be obtained directly from the industrial estate. • A westerly extension of Icknield Way Industrial Estate is now proposed onto part of Local Allocation LA5 (west of Tring). <p>(see Appendix 1 and Figures 8 and 13 in Appendix 2).</p>
23	Other areas	No new GEAs required in the Site Allocations DPD, but may be included in the East Hemel Hempstead Area Action Plan or single Local Plan.
24	Boundaries of employment sites proposed for housing	These sites (identified in Local Plan Policy 33) have now been redeveloped for housing, except for part of Ebbens Road, Hemel Hempstead and Western Road, Tring. The

		land still in employment use on these sites should be allocated for housing (see Appendix 1).
25	Location of live/work units	Consider further in the East Hemel Hempstead Area Action Plan or single Local Plan.

Responses to Pre-Submission Site Allocations DPD

1.95 Relatively few responses – either of objection or support- were received to employment policies and proposals when the Pre-Submission Site Allocations DPD was published in September 2014. A full summary of issues raised, and the Council’s response, is set out in the associated Report of Representations (July 2015). A summary of key issues is set out below.

“Chapter 4: Providing for Offices, Industry, Storage and Distribution

Responses were received from nine people/organisations relating to this chapter, with a fairly even split between supportive comments and those objecting to the document. Support was expressed by one landowner and a number of organisations including Hertfordshire County Council, Tring Town Council, Heritage England and Natural England.

General Employment Areas

An objection was raised to the policy approach to the Billet Lane General Employment Area (GEA) on the basis that the policy should allow for B2 uses. However, the evidence base identifies the GEA as unsuitable for B2 use.

The landowner used their response to promote the Akeman Street GEA site for residential use. This issue was considered as part of the Core Strategy process where it was concluded that the GEA designation should be retained.

The landowner of the Bourne End Mills Employment Area in the Green Belt objected on the grounds that the boundary of the site is too restrictive. Officers agreed that the boundary of the site should be expanded, but propose the addition of an infill area to the site’s Major Developed Site in the Green Belt designation to control the area where built development will be allowed.”

1.96 As a result of the representations received, some changes were proposed to the Pre-Submission DPD by means of ‘Focused Changes’. Significant Changes are denoted by the prefix ‘SC’, ‘Minor changes are denoted by the prefix ‘MC’ and editorial changes by the letter ‘E’. Feedback was not sought on the editorial changes, as these are factual in nature.

1.97 The following changes were proposed in the Focused Changes document: to chapter 4 of the Site Allocations document on 'Providing for Offices, Industry, Storage and Distribution':

Site Allocations Reference / Section	Amendment Reference	Amendment Required
Policy SA6	SC5	Amend boundary of Bourne End Mills Employment Area in the Green Belt to include south west part of site (see Figure 11 in Appendix 2 below for proposed new boundary).
Policies Map	E	Amend boundary of GEA: Apsley Mills, Hemel Hempstead to correct current overlap with Housing proposal Site H/9 (see Focused Changes Map Book).

Responses Received to the Focused Changes

1.98 No representations were submitted in response to Focused Change SC5. whilst some further minor changes are proposed to the Site Allocations document as a result of the Council's consideration of responses to the Focused Changes consultation, none of these directly relate to chapter 4 of the plan.

Part B: Supporting Retailing and Commerce

Introduction

- 2.1 The National Planning Policy Framework (NPPF) places a strong emphasis on the planning system encouraging and enabling sustainable economic growth. It also recognises the important role town centres have at the heart of their communities, and their importance to the local economy. The Core Strategy reiterates these objectives. It acknowledges that a significant proportion of new jobs will come from the retail and services sectors and sets out the approach to new retail development. This includes the retail hierarchy, shopping areas and out of centre retail development. The focus on the regeneration of Hemel Hempstead town centre aims to strengthen its role as a community hub and its provision of local goods and services.

National Requirements

- 2.2 National advice on protecting the natural and historic environments is provided through the National Planning Policy Framework (NPPF), with further guidance through the Planning Policy Guidance (PPG). The NPPF supersedes the advice formerly contained in Planning Policy Guidance Notes and Planning Policy Statements, most notably PPS4: Planning for Sustainable Economic Growth).
- 2.3 NPPF paragraph 23 states that planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up Local Plans, local planning authorities should:
- *recognise town centres as the heart of their communities and pursue policies to support their viability and vitality;*
 - *define a network and hierarchy of centres that is resilient to anticipated future economic changes;*
 - *define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations;*
 - *allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres.*
- 2.4 Local planning authorities are advised to prepare and maintain a robust evidence base, to understand both existing business needs and likely changes in the market (paragraph 160). This evidence base should be used to assess (paragraph 161):
- *The role and function of town centres and the relationship between them, including any trends in the performance of centres;*

- *The capacity of existing centres to accommodate new town centre development.*

2.5 More detailed Government guidance is provided in the Planning Policy Guidance (PPG). The section in the PPG on ‘Ensuring the vitality of town centres’ is particularly relevant.

Core Strategy and ‘Saved’ Policies

2.6 Dacorum’s Core Strategy was adopted on 25 September 2013 and sets a clear strategic policy framework through which to progress the Site Allocations Development Plan Document (DPD).

2.7 The main policy that relates directly to supporting retailing and commerce is:

- CS16: Shops and Commerce

2.8 Policy CS16 encourages appropriate retail development in accordance with the main retail hierarchy of town centres and local centres listed in Table 5. The hierarchy shows Hemel Hempstead town centre as a principal town centre and Berkhamsted and Tring as secondary town centres. The policy includes retail floorspace increase figures for the town centres (see Table 7 below). Capacity to meet these figures should be provided if there is demand. New retail development outside defined centres will be permitted only if it is acceptable in terms of the sequential approach and impact assessment.

Table 7: Retail floorspace monitoring targets in Policy CS16

Town	Sq. metres (net)			
	Comparison	Convenience	Total	
Hemel Hempstead	15,000			2009-2021
	32,000			2021-2031
	47,500	6,000	53,500	Total
Berkhamsted	6,000	1,000	7,000	2009-2031
Tring	2,500	750	3,250	2009-2031

2.9 The floorspace figures in Policy CS16 are as recommended by the Council’s retail consultants in the Retail Study Update 2011 (see paragraphs 2.22-24 below). The Council regards these figures as monitoring targets, not firm targets that must be met regardless of changing circumstances, given that the additional floorspace is required only if there is demand.

2.10 The Hemel Hempstead Place Strategy in the Core Strategy includes a vision for the town centre and sets out development opportunities for seven different town centre character zones. It also includes a policy for new development in Hemel Hempstead Town Centre (Policy CS33).

2.11 Several other Core Strategy policies are also relevant, including Policy NP1: Supporting Development, CS1: Distribution of Development, CS2: Selection of Development Sites, CS4: The Towns and Large Villages and CS34: Maylands Business Park.

2.12 The Core Strategy policies are complemented by 'saved' policies from the Dacorum Borough Local Plan 1991-2011. Relevant saved policies include:

- 42 – Shopping Areas in Town Centres (which defines main shopping frontages and mixed frontages)
- 43 – Shopping Areas in Local Centres
- 44 – Shopping Development Outside Existing Centres
- 45 – Scattered Local Shops
- 46 – Garden Centres
- 47 – Amusement Centres
- 48 – Window Displays

2.13 It is proposed that Policy 42 is superseded by the Site Allocations DPD. The other policies listed above will be revised and superseded through the single Local Plan, the East Hemel Hempstead Area Action Plan (if produced) and any associated guidance.

2.14 The Shopping section of the Local Plan also contains a 'Schedule of Shopping Proposals and Sites'.

Other Relevant Documents Produced by the Council

[Hemel Hempstead Town Centre Masterplan 2011-2021](#)

[http://web.dacorum.gov.uk/docs/default-source/regeneration/final-masterplan-incl.-design-appendix---adopted-jan-13-\(small\).pdf?Status=Master&sfvrsn=0](http://web.dacorum.gov.uk/docs/default-source/regeneration/final-masterplan-incl.-design-appendix---adopted-jan-13-(small).pdf?Status=Master&sfvrsn=0)

2.15 The Town Centre Masterplan was approved by the Council in January 2013. It was then adopted as a supplementary planning document in September of that year to coincide with the adoption of the Core Strategy. One of the regeneration objectives in the Masterplan (paragraph 3.4.1) states that the Council aims to assist the town centre in reaching its economic potential.

2.16 The Masterplan provides further policy advice, setting out an overarching direction for the future of the whole town centre and giving detailed guidance for the seven character zones. The Gade Zone at the northern end of the town centre is expected to undergo the most significant change (section 5.2 of the Masterplan). A Planning Statement provides detailed guidance for this zone. The proposals for the Gade Zone include a new food store.

Summary of Advice Contained in Technical Studies on Retail Issues

2.17 The retail evidence base for Dacorum comprises three studies:

- The *Dacorum Retail and Leisure Study* (Donaldsons, January 2006)
- The *Dacorum Retail Study Update 2009* (DTZ, March 2009)
- The *Dacorum Retail Study Update* (GL Hearn, October 2011)

2.18 A summary of the key points in these documents is provided below:

The Dacorum Retail and Leisure Study (2006)

<http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/evidence-base/retail-leisure-study>

2.19 The Dacorum Retail and Leisure Study was a wide ranging retail and leisure study of the Borough, covering the three towns of Hemel Hempstead, Berkhamsted and Tring. With regard to retail issues, the study included:

- Vitality and viability assessments of Hemel Hempstead, Berkhamsted and Tring town centres, applying the indicators set out in PPS6.
- Detailed quantitative forecasts of future shop floorspace need in each town up to 2021, based on a Household Interview Survey of shopping patterns in Dacorum and its catchment area.
- A survey and assessment of retailer demand for new space in the three towns in the Borough.
- A commercial review of potential retail development opportunities, applying the sequential approach of PPS6.
- Advice on retail frontage policies and the definition of primary and secondary frontages in Hemel Hempstead, Berkhamsted and Tring town centres.
- Advice on a strategy for new retail development in each of the three towns.

The Dacorum Retail Study Update 2009

<http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/evidence-base/retail-study-update-2009>

2.20 The 2009 report was commissioned to take account of significant changes between 2006 and 2009. These changes included the opening of the Riverside Centre in Hemel Hempstead town centre and an extension to the Waitrose store in Berkhamsted town centre. In addition, new information became available on population projections and retail expenditure growth, including growth forecasts for internet shopping. The report was informed by the results of a new Household Interview Survey of shopping patterns.

2.21 The Update report covered only retail development (not commercial leisure). It contained a revised assessment of the vitality and viability of Hemel Hempstead town centre, but not of Berkhamsted and Tring town centres. In addition, further advice was provided on retail frontage policies and the definition of primary and secondary frontages in Hemel Hempstead town centre.

The Dacorum Retail Study Update (2011)

<http://www.dacorum.gov.uk/docs/default-source/planning-development/spar-11.11.09-retailstudyupdateoct11.pdf?Status=Master&sfvrsn=0>

2.22 The primary purpose of the 2011 Update was to consider the quantitative need for additional retail floorspace in the Core Strategy plan period to 2031. The study also briefly reviewed the qualitative provision in the three town centres.

2.23 The conclusions of the study are summarised below:

- The detailed health checks showed that in terms of the various indicators of vitality and viability, Hemel Hempstead town centre is in reasonable health, whilst Berkhamsted and Tring town centres are in good health.
- There is a demonstrable need for additional convenience goods floorspace to serve Hemel Hempstead. This need should be met on a central site in Hemel Hempstead town centre.
- For Hemel Hempstead, the theoretical need (in 2016) is for around 2,260 sq. metres (sales) of convenience floorspace, which with some ancillary non-food floorspace would equate to a superstore of approximately 2,800 sq. metres sales or 4,300 sq. metres gross. The need increases over a longer time frame.
- The calculations showed a theoretical capacity for additional comparison shopping to serve Hemel Hempstead over the study period. However, the report recommended that no specific allocation should be made for this floorspace in the short to medium term. This reflected the level of vacant floorspace and because there was scope for existing floorspace to trade more intensively.
- The Council should monitor the take up of vacant premises and trading performance of the existing stores in the town centre and only when marked improvements are noted should the capacity and need for additional comparison shopping be revisited.
- The assessment of need for additional retail provision to serve Berkhamsted suggests only modest requirements for both convenience and comparison goods floorspace. The level of requirement did not require any specific allocation in the short/medium term to 2016/2021.
- The retail need in Tring is modest and does not require any specific allocation to address any quantitative or qualitative deficiency.
- The retail capacity for the three towns should be reviewed again within the next five years in accordance with the guidance in PPS4.

2.24 The consultant's capacity estimates for additional retail floorspace in the Borough from 2009 to 2031 have been incorporated into Core Strategy Policy CS16 (see Table 7 above).

Issues Raised in Responses to 2006 and 2008 Consultations

2.25 Initial stages of consultation on the Site Allocations DPD took place in 2006 and 2008. The issues raised in the response to these consultations are considered below. In 2014, the Council consulted on the Pre-Submission version on the Site Allocations. This was followed in 2015 by consultation on Focused Changes to the

Pre-Submission document. Consultation responses to the 2014 and 2015 documents are considered in paragraphs 2.76-2.81 below.

Site Allocations Issues and Options Paper 2006

2.26 The first consultation stage in the Site Allocations DPD process was the 2006 Issues and Options consultation:

<http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/local-planning-framework/site-allocations/site-allocations-issues-options-2006>

2.27 The consultation paper looked at the issues which needed to be considered when identifying land for different activities and suggested a number of options for tackling these issues. The document covered a wide range of topics through a series of questions. It looked at both specific sites that may be promoted for particular uses and broader designations.

2.28 The following issues were raised and questions posed on retailing in the consultation paper:

Issue 1 – Town and Local Centre Boundaries

Q26: Are there any changes required to the detailed boundaries of the existing town centres that the Council should consider?

Issue 2 – The extent of the Primary Shopping Area

Q27: Do you agree with the Council's approach to defining the primary shopping area in the town centres?

Issue 3 – Town Centre Shopping Frontages

Q28: Are there any changes to the type and spread of shopping frontages in the town centres of Hemel Hempstead, Berkhamsted and Tring that the Council should consider?

Riverside, Hemel Hempstead:

- Option 1 – designate all the parades as main shopping frontages
- Option 2 - designate all the parades as mixed shopping frontages
- Option 3 – designate a mix of main and mixed frontages

Q29: Which of the above options do you support for the Riverside development?

Issue 4 – Local Centre Shopping Frontages

Q30: Are there any changes to the extent of the defined shopping areas of local centres you would like the Council to consider?

Issue 5 – The Future of Current Shopping Proposal Sites

Site S1: Land off High Street/Water Lane, Berkhamsted

Q31: Do you agree with the Feasibility Study's conclusion regarding how Proposal Site S1 should be brought forward?

Sites TWA9 and TWA10: Apsley local centre

Q32: Do you agree with the Council's proposed approach to Proposal Sites TWA9 and TWA10?

Issue 6 – New Shopping Locations in Hemel Hempstead Town Centre

Q33: Do you agree that the Council should allocate land bounded by Bridge Street, Leighton Buzzard Road (south of Bridge Street) and Marlowes (Riverside end) for future shopping floorspace?

Issue 7 – New Shopping Location in Tring Town Centre

Q34: Do you think the Council should allocate land in the Cattle Market site and Forge car park for a new supermarket in Tring?

Issue 8 – Main Out of Centre Retailing

Q35: Should any changes be made to the detailed boundaries of the main out of centre retail locations to encourage their expansion?

2.29 The 2006 Issues and Options consultation included a Schedule of Site Appraisals, which formed part of the background technical work to support the Site Allocations DPD. The schedule included a number of sites for possible retail development. Three of these sites were the subject of Questions 31, 33 and 34 in the consultation document (see above). The only other site involving possible major retail development was land bounded by Queensway, Marlowes, Bridge Street and Leighton Buzzard Road in Hemel Hempstead town centre.

2.30 The Site Allocations Consultation Report Volume 1 summarised the response to the 2006 consultation document and the Council's decisions on which potential allocations to consider further:

<http://www.dacorum.gov.uk/docs/default-source/planning-development/spar-12.07.27-siteallocationsio2006responsesummary-v3.pdf?Status=Master&sfvrsn=0>

2.31 The Council's initial conclusions on retailing were set out in the Consultation Report as follows (paragraph 2.37):

“No significant changes should be made to the shopping centre boundaries and shopping frontages. Whether land should be allocated for shopping development in Hemel Hempstead town centre can be explored in the light of progress with the scheme and through detailed work on a Town Centre Master Plan.”

2.32 A summary of the response to the questions posed on retailing in the Consultation Report together with the actions to be taken by the Council can be found in pages 42-47 of the report. An overview is provided in Table 8 below:

Table 8: Questions on Retailing in 2006 Consultation: Summary of Response and Actions

Question	Subject	Summary of response and actions
26	Town and local centre boundaries	Response: very few boundary changes suggested. Actions: consider suggestions made.
27	Primary shopping area in town centres	Response: strong support. Actions: retain general approach.
28	Town centre shopping frontages	Response: some changes suggested. Actions: consider amending frontages in Site Allocations DPD.
29	Riverside development, Hemel Hempstead	Response: mix of main and mixed frontages favoured. Actions: consider further in Site Allocations DPD.
30	Shopping areas in local centres	Response: the majority do not want changes. Actions: none required.
31	Site S1: High Street/Water Lane, Berkhamsted	Response: most supported the Feasibility Study's conclusions. Actions: progress in line with Development Brief consultation.
32	Sites TWA9 and TWA10, Apsley	Response: most supported deletion. Actions: delete sites.
33	Shopping development at Bridge Street/ Leighton Buzzard Road/Marlowes, Hemel Hempstead	Response: relatively evenly balanced. Actions: consider further through town centre masterplanning and Site Allocations DPD.
34	New supermarket at Cattle Market site/ Forge car park, Tring	Response: most opposed the allocation. Actions: no allocation to be pursued.

35	Boundaries of main out of centre retail locations	Response: most opposed to any changes. Actions: no action required.
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Site Allocations Issues and Options Paper 2008

2.33 In 2008, the Council published the Site Allocations Supplementary Issues and Options Paper:

<http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/local-planning-framework/site-allocations/site-allocations-2008>

2.34 This paper consulted chiefly on new sites and designations that had emerged since the 2006 consultation. It did not pose any questions about retailing. The Schedule of Site Appraisals accompanying the 2008 consultation paper included two further possible retail sites, but one of these is in the area covered by the East Hemel Hempstead Area Action Plan, whilst the other site is very small.

2.35 The Site Allocations Consultation Report Volume 2 summarised the response to the 2008 consultation document and the Council's decisions on which potential allocations to consider further:

<http://www.dacorum.gov.uk/docs/default-source/strategic-planning/site-allocations-report---housing-and-other-issues.pdf?sfvrsn=0>

Sustainability Appraisal

2.36 Separate sustainability appraisal reports on the 2006 and 2008 Issues and Options documents have been prepared on an independent basis by the Council's consultants, C4S and Halcrow. The sustainability reports include an initial assessment of the sustainability conclusions for each site, which support the Council's own assessment. In addition, the Pre-Submission Site Allocations document in 2014 was accompanied by a full Sustainability Appraisal Report, whilst a Sustainability Appraisal Addendum Report accompanied the Focused Changes in 2015.

Monitoring Information

2.37 The importance of monitoring should be emphasised and the Council regularly monitors what is happening on the ground. This is done annually through the Employment Land Position Statement (ELPS) and the Authority Monitoring Report (AMR).

2.38 The ELPS includes information on all commitments (i.e. with planning permission and either not started or under construction) for class A1 retail development. It also gives information on completions over the last year. The current version of the ELPS sets out the position at April 2015:

<http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning>

2.39 The AMR enables the Council to keep a check on retail floorspace changes in the town centres, in local centres and outside designated centres. It also provides an opportunity to assess whether the monitoring targets for retail floorspace increase in Core Strategy Policy CS16 need to be reviewed and/or updated in the future. The AMR incorporates information from the ELPS

<http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning>

2.40 Paragraphs 6.26-6.41 in the AMR provide monitoring information on Core Strategy Policy CS16. There was a small net increase of A1 retail floorspace in Dacorum of about 1,800 sq. metres between 2009 and 2015 (paragraphs 6.31-6.34). Hemel Hempstead town centre experienced a net loss of 2,800 sq. metres, as a result of changes of use, whilst Berkhamsted town centre gained 2,000 sq. metres, principally because of the Marks and Spencer Simply Food store. No significant floorspace changes occurred in the other centres. Since 2009 there has been an increase in convenience floorspace, mainly due to the Tesco extension at Jarman Park, the Aldi supermarkets in Redbourn Road and Two Waters, Hemel Hempstead, and Marks and Spencer Simply Food in Berkhamsted. In contrast, there has been a decline in comparison floorspace.

2.41 Paragraphs 6.35-6.38 deal with retail commitments. The largest commitment is for 6,700 sq. metres of retail warehousing at Jarman Park (an out of centre site in Hemel Hempstead), although this has lapsed since March 2015. There is also demand for more convenience floorspace, with proposals for out-of-centre discount supermarkets for Lidl at Gossoms End/Billet Lane, Berkhamsted and a new local centre in the Heart of Maylands, Hemel Hempstead to serve the Maylands Business Park.

2.42 The other main proposed changes in retail floorspace are as follows (paragraphs 6.39 and 6.40):

- **Hemel Hempstead town centre food store:** the Retail Study Update (2010) proposed a new food store in the town centre. This proposal was carried forward into the Core Strategy. The Town Centre Masterplan identifies a site in the Gade Zone (northern part of the town centre). Morrison's have withdrawn their planning application for a superstore on the site and have abandoned their interest in the site.
- **Land off High Street/Water Lane, Berkhamsted:** This is shopping proposal Site S1 in the Dacorum Borough Local Plan 1991-2011. The Local Plan proposes a town centre redevelopment scheme for a food supermarket. However, the prospects for development seem poor because the High Street frontage is now fully occupied by shops and a café, there are land ownership issues and there is no longer a need for another supermarket given the Marks and Spencer Simply Food store and Lidl proposals.

2.43 The AMR (paragraph 6.41) reaches the following broad conclusions regarding prospects for meeting the Policy CS16 monitoring targets:

- **Hemel Hempstead town centre:** Morrison's have abandoned their proposals for a new superstore on the College/Civic Zone site and it is unlikely that another supermarket operator will be attracted to the site. If a supermarket is built here, it will be considerably smaller than the store proposed previously by Morrisons. No sites have been identified for large scale comparison shopping development and any increase in comparison floorspace is likely to be well below the figures for such floorspace in Policy CS16.
- **Berkhamsted town centre:** the Marks and Spencer Simply Food store has resulted in a significant increase in convenience floorspace. Prospects for retail development on the High Street/Water Lane site and for an overall increase in comparison floorspace are poor. Any increase in comparison floorspace is likely to be below the Policy CS16 figure.
- **Tring town centre:** there are no significant retail development proposals, so it is uncertain if there will be an overall increase in retail floorspace.
- **Local centres:** it is uncertain if there will be an overall increase in retail floorspace. The only significant proposed development is the new Heart of Maylands local centre.
- **Outside of designated centres:** a substantial net floorspace gain is expected, contrary to the monitoring target of nil net gain. Completed and committed floorspace involves a net floorspace gain of over 12,200 sq. metres. This results from the completed Tesco extension and the proposed retail warehousing at Jarman Park, Hemel Hempstead permitted prior to the Core Strategy, and the three discount food supermarkets permitted since 2012 (two Aldi stores in Hemel Hempstead and Lidl in Berkhamsted). The arrival of the discounters is a notable trend, with the gross floorspace of the three built/permitted supermarkets amounting to more than 4,800 sq. metres. Since March 2015, the Council has resolved that an application for out-of-centre retailing on the Lucas Aerospace site in Hemel Hempstead should be approved (see paragraphs 2.71-2.73 below).

Conclusions on Questions Posed in 2006 Consultation Document

2.44 The questions on retailing posed in the 2006 Site Allocations Issues and Options consultation document are set out above, in the section on 'Issues raised in consultation responses'. Also, Table 6 in this section summarises the consultation response and the main actions to be taken by the Council.

2.45 Table 9 below now reaches conclusions on these questions. The conclusions reflect the advice in the technical studies, the outcome of the 2006 and 2008 Site Allocations Issues and Options consultations and the monitoring findings.

Table 9: Questions on Retailing in 2006 Consultation: Conclusions

Question	Subject	Conclusions
26	Town and local centre boundaries	Hemel Hempstead town centre: amend boundary to reflect that shown in the Hemel Hempstead Town Centre Masterplan (see paragraph 2.15 above). Other centres: retain existing boundaries, but reconsider these boundaries in the single Local Plan.
27	Primary shopping area in town centres	The term 'key shopping area' should be used to reflect terminology in the NPPF. The key shopping area boundaries in each town centres should include all the proposed primary and secondary frontages (see conclusions on Question 28 below).
28	Town centre shopping frontages	The extent of the frontages should be amended and they should be called primary and secondary frontages to reflect the terminology in the NPPF (see section on 'Review of town centre retail frontage policy' below).
29	Riverside development, Hemel Hempstead	Designate part as a primary frontage and part as a secondary frontage (see 'Review of town centre retail frontage policy' below).
30	Shopping areas in local centres	The Local centres are generally performing well and their defined shopping areas should remain unchanged. This policy approach should be reviewed through the single Local Plan.
31	Site S1: High Street/Water Lane, Berkhamsted	Delete site, as it seems unlikely to be brought forward for development, mainly because: <ul style="list-style-type: none"> • High Street frontage is now fully occupied by shops and a café. • Land ownership issues. • No longer a need for a new supermarket, given new Marks and Spencer food store and proposed Lidl supermarket (see conclusion on Question 35 below). •
32	Sites TWA9 and TWA10, Apsley	Delete sites as proposals to redevelop these frontages within the Apsley local centre are unlikely.

33	Shopping development at Bridge Street/ Leighton Buzzard Road/Marlowes, Hemel Hempstead	This land should not be allocated for future shopping floorspace, because: <ul style="list-style-type: none"> • The Hemel Hempstead Town Centre Masterplan does not propose major retail development. • There does not appear to be market demand for such development.
34	New supermarket at Cattle Market site/ Forge car park, Tring	No allocation to be pursued, now that a Marks and Spencer food store has opened in the town centre at Dolphin Square.
35	Boundaries of main out of centre retail locations	Retain existing boundaries. However, three additional sites should be designated as out of centre retail locations (see Figures 14-16 in Appendix 4): <ul style="list-style-type: none"> • Jarman Fields, Hemel Hempstead The Core Strategy redesignated Jarman Fields from a local centre with a district shopping function to an out of centre retail and leisure location. • Land at London Road/Two Waters Way, Hemel Hempstead, where an Aldi supermarket has now opened. • Gossoms End/Billet Lane, Berkhamsted, which should be allocated for a mixed use proposal for out of centre retail and housing (a Lidl supermarket and housing is proposed).

Review of Town Centre Retail Frontage Policy

2.46 Policy 42 in the Dacorum Borough Local Plan provides guidance on shopping areas in town centres. The policy states that each town centre contains a shopping area, which includes:

- main shopping frontages; and
- mixed frontages

2.47 The extent of the existing main and mixed frontages is shown in Figures 17-19 in Appendix 5.

2.48 The approach to these frontages in Local Plan Policy 42 is summarised below:

- **main shopping frontages:** no further loss of shops will be permitted at street level;
- **mixed frontages:** a mix of shops and other uses appropriate to a shopping area will be acceptable at street level. A minimum proportion of shops will

be maintained in each parade. Proportions will vary depending on the importance of the frontage.

2.49 Policy 42 adopts a generally restrictive approach towards the loss of existing shops. However, it is important to note that there are some parts of the town centres which are mainly in A1 retail use or other A-class uses (such as banks and cafes), but which are not included in the defined frontages.

2.50 The 2006 and 2009 Retail Studies (see paragraphs 2.19-2.21 above) included advice on retail frontage policies and the definition of primary and secondary frontages in the three town centres. The consultants recommended that the defined frontages should be more extensive than those defined in the Local Plan, but there should be more flexibility regarding what types of uses should be accepted in the frontages.

2.51 In reviewing the policy on retail frontages, it is also necessary for the Council to take account of:

- revised Government guidance in paragraph 23 of the NPPF and the PPG (see paragraphs 2.2-2.5 above);
- changes to permitted development rights which allow for the change of use from a small shop or professional/financial service to residential use, subject to a local impact test;
- evidence regarding existing uses and footfall;
- new retail development, such as the Marks and Spencer food store in Berkhamsted town centre;
- the wider social and leisure role now played by town centres and the rise in internet shopping and out of centre retailing, which has reduced expenditure in town centres on certain types of goods, such as books, CDs and bulky goods; and
- guidance on Hemel Hempstead town centre in the Place Strategy (Core Strategy) and the Town Centre Masterplan (see paragraphs 2.6-2.16 above).

2.52 With regard to bullet 2 above, the local impact test includes consideration of whether the shop is in a key shopping area. In the light of the impact test and the guidance in paragraph 23 of the NPPF, it is considered that 'key shopping areas' should be defined in each town centre in the Site Allocations DPD. The boundaries of the key shopping areas should cover all the proposed primary and secondary frontages.

2.53 Within the key shopping areas, it is important to retain active frontages at the ground floor level; residential and office uses should therefore be resisted. Active frontages enhance the vitality and vibrancy of town centres; a proliferation of inactive frontages can result in 'dead' frontage, reduced pedestrian flows and lead to the gradual disappearance of shopping.

2.54 After taking all these factors into account, the Council concludes that a more flexible approach is appropriate in retail frontages. The new approach will support an increase in overall footfall and will enhance the vitality and viability

of these areas. This policy approach should be supported by appropriate improvements to the public realm.

2.55 As recommended by the Council’s retail consultants, it is considered that the frontages should be more extensive than at present. Nevertheless, it is felt that not all the recommendations in the 2006 and 2009 Retail Studies should be followed. This is because some of the secondary frontages recommended by the consultants contain very few A-class uses.

2.56 The new frontages should be called primary and secondary frontages (rather than main and mixed frontages), to reflect the terminology in the NPPF. There should not be any rules (for example based on percentages or numbers of units) to retain a certain proportion of each frontage in use class A1 (shops). Instead, there should be full flexibility for a range of different uses in the frontages.

2.57 Within primary frontages, it is proposed that there should be complete flexibility for the following uses (as defined in the Town and Country Planning Use Classes Order) at ground floor level:

- A1 (shops);
- A3 (restaurants and cafes); and
- D2 (assembly and leisure).

2.58 Within secondary frontages, there should be complete flexibility for the following uses at ground floor level:

- A1 (shops);
- A2 (financial and professional services);
- A3 (restaurants and cafes);
- A4 (drinking establishments);
- A5 (hot food takeaways);
- D1(non-residential institutions); and
- D2 (assembly and leisure).

2.59 The proposed primary and secondary frontages are shown in Figures 17-19 in Appendix 5, whilst the address of the properties within these frontages is given in Table 10 below:

Table 10: Addresses of Properties in Proposed Primary and Secondary Frontages

Centre	Primary Frontages	Secondary Frontages
Hemel Hempstead	Marlowes Shopping Centre: (all) Marlowes: 147-233, 172-233, 237-254, 260 Riverside: 2, 14-19, 20-27	Marlowes: 89-105, 107-145, 126-148, 150-170 Market Square: 1-32 Waterhouse Street: Salvation Army, 1-97, Swan Court Bank Court: 1-12 Bridge Street: 1-11, 2-24

		Riverside: 3-6, 9-12
Berkhamsted	High Street: 160-206, 208-252 Lower Kings Road: 1, 2, 4, 6	High Street: 124-156, 141-151, 153-193, 197-233, 254-300 Lower Kings Road: 3-9, 1-2 Claridge Court, 13-43, 8-30, Kings Chambers
Tring	Dolphin Square: 2a, 3, 4, 5-7, 8	High Street: 16-21, 23-41, 23-26, 61-69, 62-76, 71-87

Shopping Proposal Sites

2.60 A decision needs to be made on which sites, if any, should be allocated as Shopping Proposal Sites in the Site Allocations DPD. In order to reach conclusions, it is necessary to review the sites on the Local Plan's Schedule of Shopping Proposal Sites and then consider if any new sites should be allocated.

Sites on the Local Plan's Schedule of Shopping Proposal Sites

2.61 The Schedule of Shopping Proposal Sites in the Local Plan contains seven sites proposed for retail development. Table 10 below summarises the current situation on these sites and recommends a way forward in the Site Allocations DPD:

Table 10: Review of Local Plan's Schedule of Shopping Proposal Sites

Local Plan site ref.	Address	Current situation	Site Allocations: recommended way forward
S1	Land off High Street/Water Lane, Berkhamsted	Council approved a Concept Statement in 2007, but site has not been brought forward for development.	Delete site – see conclusions on Question 31 in Table 9 above.
S2	Land adjoining Plough Roundabout, Hemel Hempstead	Development completed (Riverside Centre).	Not applicable, as development completed.
S3	Jarman Fields, St Albans Road, Hemel Hempstead	Outline planning permission for 6,700 sq. metres of non-food retail warehousing lapsed.	Include on Schedule of Shopping Proposal Sites in Site Allocations DPD (see Figure 20 in Appendix 6).

		Outline application for 10,305 sq. metres of A1 retail (convenience and comparison) and 185 sq. metres of A3 floorspace refused 16/06/15. Currently subject to an appeal.	Acceptable uses are retail and leisure uses. The nature and scale of development should aim to maximise the use of the site and ensure no significant adverse impact on Hemel Hempstead town centre. The sale and display of clothing and footwear is not acceptable, unless ancillary to the main use of an individual unit.
TWA8	Car park and adjoining land, London Road, Apsley, Hemel Hempstead	Doctors' surgeries and pharmacy built on part of site, housing and two shops under construction on the remainder.	Do not include in Site Allocations, as development is partly completed and partly in progress.
TWA9	62-110 London Road, Apsley, Hemel Hempstead	Redevelopment has not taken place.	Delete site – see conclusions on Question 32 in Table 9 above.
TWA10	Land at and adjoining 18-56 London Road, Apsley, Hemel Hempstead	Redevelopment has not taken place.	Delete site – see conclusions on Question 32 in Table 9 above.
S4	Dolphin Square, High Street/Frogmore Street, Tring	Refurbishment/partial redevelopment completed.	Not applicable

2.62 In view of the above, it is recommended that only site S3 (Jarman Fields) should be included on the Schedule of Shopping Proposal Sites in the Site Allocations DPD.

Potential new sites

2.63 Table 7 above sets out the retail floorspace monitoring targets from Core Strategy Policy 16. The Authority Monitoring Report (see paragraphs 2.39-2.43 above) shows that comparison floorspace is declining in Dacorum. Convenience floorspace is increasing, but completed and committed floorspace will not meet the floorspace figures in Policy CS16 for the period to 2031.

- 2.64 This means that it is important to consider whether new shopping proposals should be included in the Site Allocations DPD. However, it is important to remember that Policy CS16 states that additional capacity should be provided only if there is demand.
- 2.65 It is recommended that the following sites should be shown in the Site Allocations DPD as mixed use proposals, including a retail element:
- West Herts College site and Civic Zone, Queensway / Marlowes / Combe Street (north) / Leighton Buzzard Road, Hemel Hempstead (see Figure 21 in Appendix 6)
 - Gossoms End/Billet Lane in Berkhamsted (see Figure 22 in Appendix 6)
- 2.66 The College/Civic Zone site is where Morrison's previously proposed a superstore and where the Hemel Hempstead Town Centre Masterplan proposes a foodstore. New college buildings and a Public Service Quarter (including a replacement for the civic Centre) are also proposed on this site.
- 2.67 Construction is now in progress on a replacement college campus and the Forum (i.e. Public Service Quarter). The site may still include a retail element, although it is unlikely that the proposals will feature a supermarket. In the circumstances, it would be appropriate to allocate the site as a mixed use proposal in the Site Allocations DPD and for the proposals to include retail uses, possibly including a food store.
- 2.68 The Council has granted planning permission for a Lidl supermarket and housing at Gossoms End/Billet Lane, Berkhamsted. Further information can be found in Appendix 1 (see text on the Billet Lane General Employment Area). Paragraph 4.16 in the Dacorum Retail Study Update 2009 identified a need for a 'deep discount' food store in Berkhamsted. Bearing this in mind and taking account of other factors such as the lack of a sequentially preferable site, it is considered that a mixed use proposal for a food store and housing in the Site Allocations DPD would be appropriate.
- 2.69 The above proposals will not be sufficient to meet the Policy CS16 retail floorspace monitoring targets in the Site Allocations DPD. If sufficient land was to be allocated to meet the targets in full, it would mean that land would have to be identified for:
- a substantial amount of comparison floorspace in Hemel Hempstead;
 - additional comparison floorspace in Berkhamsted; and
 - a modest amount of additional comparison and convenience floorspace in Tring.
- 2.70 For many years demand for additional retail floorspace in the Borough was very low, except for convenience floorspace in Hemel Hempstead and Berkhamsted. This probably reflected the length and depth of the recent recession and the increasing trend towards internet shopping. Furthermore, the Hemel Hempstead Town Centre Masterplan does not contain any major proposals for comparison shopping development.

2.71 However, there are now clear signs of an increase in demand for both convenience and comparison floorspace in Hemel Hempstead. Three major planning applications were submitted in 2015, all in out-of-centre locations:

- Jarman Fields: an outline application proposed 10,305 sq. metres (gross internal area) of Class A1 retail floorspace. 8,000 sq. metres net comparison goods floorspace and 812 sq. metres net convenience goods floorspace. This site is proposed for retail development in the Local Plan and the Site Allocations DPD (see Table 10 above). However, planning permission was refused because of the harmful impact on Hemel Hempstead town centre. The application is currently the subject of an appeal
- Lucas Aerospace site, Maylands Avenue: an outline application proposed 12,500 sq. metres of retail floorspace. The proposed retail floorspace involves a supermarket (2,356 sq. metres gross internal area/1,767 sq. metres net sales) and 10,147 sq. metres gross internal area/7,495 sq. metres net sales of non-food (comparison) retail. This application went to Development Control Committee in December 2015 and was delegated with a view to approval.
- Breakspear House, Maylands Avenue: a full application was submitted for a Lidl foodstore. The proposed floorspace was 2,000 sq. metres gross internal, 1,230 sq. metres net sales area. This application was refused on 30/10/2015.

2.72 The Lucas Aerospace and Breakspear House applications raised major policy issues, in view of their out-of-centre location in the Maylands Gateway, which is the Borough's main site for B-class employment development (see Part A of this Issues Paper). The future of these sites will be considered through the East Hemel Hempstead Area Action Plan (AAP) or the single Local Plan, rather than the Site Allocations DPD.

2.73 The Council decided that the Lucas Aerospace application should be approved for a number of reasons. These reasons included:

- The impact on Hemel Hempstead town centre and the local centres is unlikely to be significant and adverse, subject to conditions being attached to restrict the type of goods sold.
- There appears to be a quantitative need for some additional out of centre retailing in Hemel Hempstead, although the forecasts in the Retail Study Update are now quite old.
- It appears that the town centre's health is strong enough to withstand competition from additional out of centre comparison retailing, subject to the scale not being too large and conditions being attached to any planning permissions to mitigate the impact on the town centre.

2.74 Taking all of the above factors into account, it is concluded that there is no need for additional shopping allocations in the Site Allocations DPD, over and above those referred to in Table 10 and paragraph 2.64.

2.75 It should also be borne in mind that the Council has already started compiling the evidence base for the single Local Plan. The evidence base work will include an updated retail study, leading to revised shopping floorspace targets and (if appropriate) further site specific retail proposals. Adoption of the Single Local Plan is programmed for March 2018 as indicated by the Local Development Scheme (2016).

Responses to Pre-Submission Site Allocations DPD

2.76 Relatively few responses – either of objection or support- were received to employment policies and proposals when the Pre-Submission Site Allocations DPD was published in September 2014. A full summary of issues raised, and the Council’s response, is set out in the associated Report of Representations (July 2015). A summary of key issues is set out below.

“Chapter 5: Supporting Retailing and Commerce

Only two responses were received to this chapter; both from landowners, with one supportive comment and one objection.

The main objection was raised on behalf of the landowner of the Retail Proposal S/1 at Jarman Fields on the basis that planning requirements for the site are linked to an existing planning permission. Officers agree that this approach is not appropriate and have changed the planning requirements accordingly, whilst retaining the key principles around acceptable uses.”

2.77 As a result of the representations received, some changes were proposed to the Pre-Submission DPD by means of ‘Focused Changes’. Significant Changes are denoted by the prefix ‘SC’, ‘Minor changes are denoted by the prefix ‘MC’ and editorial changes by the letter ‘E’. Feedback was not sought on the editorial changes, as these are factual in nature.

2.78 The following changes were proposed in the Focused Changes document: to chapter 5 of the Site Allocations document on ‘Supporting Retailing and Commerce’:

Site Allocations Reference / Section	Amendment Reference	Amendment Required
Text: 5.1-5.10	E	Paragraph 5.10: Amend as follows: 5.10 Potential Changes to permitted development (PD) rights may allow for the change of use from a small shop or professional/financial service to residential

		<p>use, subject to a local impact test. This test includes consideration of whether the shop is in a key shopping area. Within the key shopping areas, it is important to retain active frontages at the ground floor level; residential and office uses will therefore be resisted. Active frontages enhance the vitality and vibrancy of town centres; a proliferation of inactive frontages can result in 'dead' frontage, reduced pedestrian flows and lead to the gradual disappearance of shopping.</p>
<p>Schedule of Retail Proposals and Sites</p>	<p>SC6</p>	<p>Amend schedule as follows:</p> <p>Proposal S/1</p> <p>Location: Jarman Fields, St Albans Road, Hemel Hempstead</p> <p>Site Area (Ha): 2.0</p> <p>Planning Requirements: Proposed use is 6,700sq m (gross) of non-food retail warehousing as per planning permissions 04/00455/07/MFA and 04/00377/10/VOT. Acceptable uses are retail and leisure uses. Approximately 7,000 sqm (gross) of retail floorspace is acceptable, except for the sale and display of clothing and footwear, unless ancillary to the main use of an individual unit. Prominent frontages onto St Albans Road/Jarman Way require high quality of design and landscaping. A traffic study may be required and road works should accommodate traffic generation.</p>

Responses Received to the Focused Changes

2.79 The only representations in response to Focused Change SC6 were submitted on behalf of the landowners, who submitted two objections and four representations in support. The objections and the Council's response is summarised below:

Issue / Summary of Comment	Response
<p>The proposed approximate retail floorspace figure of 7,000sqm is not justified as it is not in line with the Core Strategy, nor does it maximise the use of the site. There is sufficient evidence available to support an indicative floorspace estimate of 10,000sq.m in preference to 7,000sq.m.</p>	<p>Change required. The Council accepts that the justification for the 7,000sqm has been weakened with the expiration of the planning permission for retail use on the site which was in existence at the time of writing the Core Strategy and the Pre-Submission Site Allocations DPD.</p> <p>However, it does not consider that there is sufficient evidence to justify a retail floorspace figure of 10,000sqm. The planning requirements will be amended to reflect the need to balance maximising the use of the site with protecting the town centre from harmful impact.</p>
<p>There is a requirement to also change Table 1 on page 45. Jarman Fields is referred to as an out of centre retail and leisure location. Under ‘Main Uses’ it is stated ‘food retailing and bulky non-food goods. Leisure uses’.</p> <p>As a result of the Focused change for Proposal S/1, the description of the ‘Main Uses’ in Table 1 also requires to change to remove the term ‘bulky’.</p>	<p>No change. Table 1 has not been amended through the Focused Changes: the text remains as set out in the original Pre-Submission document. The same issue regarding Table 1 was raised during the Pre-Submission consultation. See the Council’s response in the Report of Representations on the Pre-Submission Site Allocations (July 2015).</p>

2.80 In view of the above, the Council concluded that Focused change SC6 should be amended to read as follows:

“Acceptable uses are retail and leisure uses. The nature and scale of development should aim to maximise the use of the site and ensure no significant adverse impact on Hemel Hempstead town centre. The sale and display of clothing and footwear is not acceptable, unless ancillary to the main use of an individual unit.”

2.81 This change is not considered to be ‘significant’ i.e. it does not affect the intent of the plan, or the boundaries and requirement of designations within it. Therefore, the change to SC6 does not trigger the need for further consultation.

APPENDIX 1: Review of Existing Employment Areas and Sites

1. General Employment Areas (Local Plan Policy 31) and Employment Areas in the Green Belt (Policy 32)

Note:

Column 1: GEA/GEAB

GEA = General Employment Area (Policy 31 sites)

EAGB = Employment Areas in the Green Belt (Policy 32 sites)

Column 2: RTP assessment (2010) = assessment by Roger Tym & Partners in 'SW Hertfordshire Employment Land Update'

The information in column 2 includes 'average score' i.e. RTP's market potential average score. This represents overall potential for existing use. It takes account of the scores given for the following main factors which determine a site's market potential:

- Strategic access
- Local access
- External environment
- Internal environment
- Local market conditions

The five criteria and overall market potential are scored on a scale of 1-5 as follows:

1.	Excellent
2.	Good
3.	Poor
4.	Average
5.	Inadequate

In terms of overall market potential, the consultants advised as follows:

Rating of site	Would site be taken up during plan period if offered to the market under reasonable likely market conditions?
Excellent or good (1-2)	Likely
Average (3)	Uncertain
Poor or inadequate (4-5)	Unlikely

GEA/ EAGB	Local Plan: Proposed employment uses	Local Plan: other key points	RTP assessment (2010)	Current situation	Site Allocations: issues and recommended way forward
POLICY 31: GENERAL EMPLOYMENT AREAS					
1. BERKHAMSTED					
Billet Lane (1.4 ha.) See Figure 1 in Appendix 2	Business, industry, storage and distribution	Land to west covered by Policy 33 (conversion of employment land to housing and other uses)	Para. 4.39 (and 3.46): Berkhamsted's GEAs are good quality - no reason to release for other uses <u>Appendix 2: Existing site assessment</u> Main current use: gen. industrial Average score = 2.4	Core Strategy para. 21.10: "A baseline of around 7,700 jobs in the B-class uses will be maintained to ensure an adequate supply of employment land that contributes towards the town's local economy, and maintains a reasonable balance between local homes and jobs." High St. frontage: part occupied	Remove High Street frontage from the GEA (see Figure 1) as the site has been cleared (except Majestic Wine), a Lidl store permitted and uncertainty over attractiveness of

			<p>Recommendation: safeguard for current use.</p> <p>Comments: good road access and prominence to High Street; suitable for small and medium units.</p>	<p>by Majestic Wine; rest has been cleared prior to redevelopment (planning permission 4/01317/14/FUL granted for a Lidl supermarket and housing (30 units).</p> <p>Northern area (0.76 ha. between R. Bulbourne and canal): 1930s building. Permission granted (4/01244/13/FUL) for refurbishment, including part demolition and sub-division for Jewsons and B1/B2 B8 units.</p>	<p>site for new B-class development.</p> <p>Allocate Lidl site for out of centre retail and housing.</p> <p>Retain northern area in the GEA (for B1 and B8 uses – B2 not appropriate given proximity to existing and proposed housing).</p>
Northbridge Road (6.7 ha.)	Business, industry, storage and distribution	<p>Includes site E1: Northbridge Road (see Schedule of Employment Proposal Sites below)</p> <p>Policy 37 encourages environmental improvements.</p>	<p>Para. 4.39 (and 3.46): Berkhamsted's GEAs are good quality - no reason to release for other uses.</p> <p><u>Appendix 2: Existing site assessment</u></p> <p>Main current use: gen. industrial</p> <p>Average score = 2.4</p> <p>Recommendation: safeguard for current use.</p>	<p>Core Strategy para. 21.10: see Billet Lane above.</p> <p>Site E1 completed.</p> <p>Shown as an Employment Land Area of Search (ELAS167) in Waste Site Allocations. Types of waste management facility that meet the capacity shortfalls in the Hertfordshire Waste Core Strategy and Development Management document are</p>	<p>Retain GEA (for B1, B2 and B8 use).</p> <p>Refer to the Employment Land Area of Search and household waste site (see column 5).</p>

			Comments: best employment area in Berkhamsted; reasonable local access; suitable for small and medium units.	acceptable in principle. The household waste site is safeguarded under the Hertfordshire Waste Core Strategy.	
River Park (1.1 ha.)	Business, industry		Para. 4.39 (and 3.46): Berkhamsted's GEAs are good quality - no reason to release for other uses. <u>Appendix 2: Existing site assessment</u> Main current use: gen. industrial Average score = 2.4 Recommendation: safeguard for current use. Comments: only suitable for small units.	Core Strategy para. 21.10: see Billet Lane above	Retain GEA (for B1 and B2 use).
HEMEL HEMPSTEAD					
Breakspear Park (7.8 ha.)	Business (core office location)		Para 3.31: Breakspear Park is a high quality out-of-town development close to M1 Junction 8.	Core Strategy (see Figures 18 and 22) shows this GEA within Maylands Gateway (but is not covered by Maylands Gateway Development Brief).	Consider in East Hemel Hempstead Area Action Plan (EHHAAP) or

			<p><u>Appendix 2: Existing site assessment</u> Main current use: offices.</p> <p>Average score = 1</p> <p>Recommendation: safeguard for current use.</p> <p>Comments: modern HQ office campus; excellent local and strategic access.</p>		single Local Plan.
Buncefield (26.1 ha.)	Storage and distribution, oil terminal	<p>Includes site E3: Boundary Way (north) (see Schedule of Employment Proposal Sites below)</p> <p>See LP Policy 125 (hazardous substances)</p>	<p><u>Appendix 2: Existing site assessment</u> Main current use: industrial.</p> <p>Average score = 1.8</p> <p>Recommendation: safeguard for current use.</p> <p>Comments: currently an oil depot, but suitable for full range of employment uses, especially distribution / noisy uses.</p>	<p>Core Strategy shows a split between Buncefield Oil Depot and Service Centre (storage, distribution and warehousing proposed) – see Core Strategy Figures 18 and 22).</p> <p>Revised HSE consultation zones apply.</p> <p>Site E3 completed.</p> <p>Shown as an Employment Land Area of Search (ELAS168) in Waste Site Allocations.</p>	<p>Consider in EHHAAP or single Local Plan.</p> <p>Refer to the Employment Land Area of Search (see column 5).</p>
Maylands (59.1 ha.)	Business, industry, storage and	Includes site E5: Boundary Way (east)	Para. 4.20: DBC should be more flexible over types of B-class use in Maylands Avenue and allow	Core Strategy shows a split between Face of Maylands, Engine Room and Service Centre	Consider in EHHAAP or single Local

	distribution	(see Schedule of Employment Proposal Sites below)	<p>some B2/B8 to better reflect demand.</p> <p><u>Appendix 2: Existing site assessment</u> Main current use: mixed employment.</p> <p>Average score = 1.8</p> <p>Recommendation: safeguard for current use.</p> <p>Comments: currently a mixed employment area, comprising office campuses, B8 units and industrial uses.</p>	<p>(see Core Strategy Figures 18 and 22).</p> <p>Site E5 completed.</p> <p>Most of area shown as an Employment Land Area of Search (ELAS006) in Waste Site Allocations.</p>	<p>Plan.</p> <p>Refer to the Employment Land Area of Search (see column 5).</p>
Maylands Avenue (26.9)	Business (core office location)		<p>Para. 4.20: DBC should be more flexible over types of B-class use in Maylands Avenue and allow some B2/B8 to better reflect demand.</p> <p><u>Appendix 2: Existing site assessment</u> Main current use: offices.</p> <p>Average score = 1.8</p> <p>Recommendation: consider transfer to other use (B or non-B).</p>	<p>Core Strategy shows a split between Face of Maylands, Heart of Maylands and Maylands Gateway (see Core Strategy Figures 18 and 22). Mixed use development proposed at Heart of Maylands.</p> <p>Small part shown as an Employment Land Area of Search (ELAS006) in Waste Site Allocations.</p>	<p>Consider in EHHAAP or single Local Plan.</p> <p>Refer to the Employment Land Area of Search (see column 5).</p>

			Comments: office avenue with mixture of ages. Further intensification may cause stress without investment in infrastructure and public transport. Lack of supporting uses (e.g. food and drink, retail).		
Paradise (3.8 ha.) See Figure 2 in Appendix 2	Business (core office location)	Policy 37 encourages environmental improvements.	<p><u>Appendix 2: Existing site assessment</u></p> <p>Main current use: offices.</p> <p>Average score = 3.2</p> <p>Recommendation: safeguard for current uses.</p> <p>Comments: Local access poor, but well related to town centre. Existing uses include smaller offices and light industrial/workshop uses. Potential for scheme involving town centre and hospital, as part of wider masterplan area.</p>	<p>Core Strategy (Figures 17 and 21) includes this GEA in the Hospital Zone. Figure 17: this zone holds significant regeneration opportunities for residential, education, health and business uses.</p> <p>Town Centre Masterplan (section 5.4): Paradise employment area will become a mixed use development with business/light industrial uses and new housing.</p> <p>Housing and self-storage building under construction on Royal Mail site (4/01450/12/MFA).</p> <p>A small area of land at the northern end of the GEA on Park Lane is within the hospital site.</p> <p>Part of GEA owned by Dacorum Borough Council.</p>	Show as being within Hemel Hempstead town centre. Allocate as a mixed use proposal for B1 led business use and housing.

Swallowdale (40.6 ha.)	Industry, storage and distribution		<p><u>Appendix 2: Existing site assessment</u> Main current use: gen. industrial.</p> <p>Average score = 1.6</p> <p>Recommendation: safeguard for current uses.</p> <p>Comments: mainly industrial in character. Congestion on wider estate. Part new B8, part older B2/B8.</p>	<p>Core Strategy shows a split between Engine Room and Service Centre, but land NW of Nickey Line is an 'Area of Residential Opportunity' (Aldi supermarket and homeless hostel built on part of this land).</p> <p>Waste Site Allocations shows:</p> <ul style="list-style-type: none"> • most of GEA as an Employment Land Area of Search (ELAS007); • Cupid Green Depot as an existing strategic site (SA060). <p>Includes household waste site.</p> <p>Viking House site approved for housing (4/01077/13 and 4/01332/13).</p>	<p>Consider in EHHAAP or single Local Plan - decision required on how to deal with Area of Residential Opportunity and Viking House.</p> <p>Refer to the Employment Land Area of Search and Cupid Green depot unless relocation is proposed (see column 5).</p>
Two Waters and Apsley					
Apsley (0.6 ha.)	Industry		<p><u>Appendix 2: Existing site assessment</u> Main current use: gen. industrial.</p> <p>Average score = 2.2</p> <p>Recommendation: safeguard for current uses.</p>	<p>Core Strategy para. 20.8: "...there is an important role for designated employment land in Two Waters and Apsley. This will normally be retained. The heritage of the paper making industry will be conserved."</p>	<p>Very small, but retain as a GEA, as it is well occupied and provides small units, which are in short supply.</p>

			Comments: small industrial uses. High level of occupancy.	Council owned.	Propose for B1(c) light industrial use. B2 not appropriate given proximity to housing.
Apsley Mills (3.3 ha.) See Figure 3 in Appendix 2	Business (core office location)	Most within site TWA7: land at former John Dickinsons (see Schedule of Employment Proposal Sites below)	<p><u>Appendix 2: Existing site assessment</u></p> <p>Main current use: offices.</p> <p>Average score = 2.6</p> <p>Recommendation: safeguard for current uses.</p> <p>Comments: Suitable for smaller offices or light industrial uses (not B2/B8). Character of area has changed – now dominated by retail and new housing.</p>	<p>Core Strategy para. 20.8: see 'Apsley' above.</p> <p>Most of GEA now developed or proposed for non-B class uses, as shown below (see Figure 3):</p> <p>Area 1: Largely cleared site. DBC has purchased 0.38 ha. (next to Homebase) for new Council housing. Planning permission granted for housing development.</p> <p>Area 2: The Cottage Building (listed building). Used as offices for Paper Trail and other firms. Paper Trail's main base is now at Frogmore Mills (see 'Frogmore' GEA above).</p> <p>Area 3: Redeveloped for hotel, public house and flats. John Dickinson Enterprise Centre (old building by the canal) is in B1 use.</p>	<p>Retain areas 2 and 4 in column 5 as a GEA (for B1 use). All types of B1 are acceptable, so should no longer be a core office location.</p> <p>Remove from the GEA the land covered by the following areas:</p> <ul style="list-style-type: none"> • Area 1, as housing is proposed (allocate for housing). • Area 3, as redeveloped for non B-class uses, except John Dickinson

				<p>Area 4: Mercedes-Benz car dealership on London Road is the only part of GEA outside TWA7. This is not a B-class use and there are no proposals to redevelop the site.</p> <p>Area 5: Redeveloped for housing.</p>	<p>Enterprise Centre which is too small to be a GEA.</p> <ul style="list-style-type: none"> • Area 5, as housing built.
<p>Corner Hall (2.6 ha.)</p> <p>See Figure 4 in Appendix 2</p>	<p>Business (core office location)</p>		<p><u>Appendix 2: Existing site assessment</u></p> <p>Main current use: offices.</p> <p>Average score = 2.2</p> <p>Recommendation: safeguard for current uses.</p> <p>Comments: mixed use area, incorporating offices, retail and motor trade uses. Location close to town centre makes it suitable for B1. Should be part of a wider area town centre masterplan.</p>	<p>Core Strategy para. 20.8: see 'Apsley' above.</p> <p>Currently used for a variety of uses. Main areas:</p> <ol style="list-style-type: none"> 1. Car wash on Plough Roundabout (now proposed for Council housing). 2. Car sales and repairs in Two Waters Road. 3. Mixed commercial and residential uses in Lawn Lane (north of Corner Hall). 4. Offices, south of Corner Hall (change of use to residential approved under prior approval rules – part under construction). 5. Builders yard (Travis Perkins), heating/plumbers merchants and offices on Lawn Lane (south of area 4). 	<p>Retain areas 2, 4 and 5 in column 5 (see Figure 4) as a GEA, because:</p> <ul style="list-style-type: none"> • Areas 2 and 5: existing uses are appropriate in a GEA. Could go for B-class development in the future. • Area 4: good quality offices (although prior approval granted for change of use to residential). <p>Remove from the</p>

				Town Centre Masterplan (section 5.6) covers only the car wash site (housing proposed).	GEA the land covered by the following areas in column 5: <ul style="list-style-type: none"> • Area 1, as housing is proposed (allocate for housing); and • Area 3, as not in B-class use.
Doolittle Meadow (6.2 ha.)	Business (core office location)		<p><u>Appendix 2: Existing site assessment</u></p> <p>Main current use: offices.</p> <p>Average score = 3</p> <p>Recommendation: safeguard for current uses.</p> <p>Comments: substantial 1980s HQ offices (much is vacant). Area suitable only for B1. Reasonable public transport, but otherwise peripheral. Local highway congestion may constrain development.</p>	<p>Core Strategy para. 20.8: see 'Apsley' above.</p> <p>Still in office use, partly by Hertfordshire County Council.</p>	Retain GEA (for B1 (a) office use).

<p>Frogmore (4.1 ha.)</p> <p>See Figure 5 in Appendix 2</p>	<p>Industry, storage and distribution</p>	<p>Policy 31 encourages use of Frogmore Mill for paper industry heritage facility.</p> <p>Policy 37 encourages environmental improvements.</p>	<p>Para. 4.35: the site should be released for alternative development (loss of 16,400 m² industrial/warehouse space).</p> <p><u>Appendix 2: Existing site assessment</u> Main current use: gen. industrial.</p> <p>Average score = 3.6</p> <p>Recommendation: consider transfer to other use (B or non-B).</p> <p>Comments: reasonable quality small/medium sized units, but constrained by restricted access – long term future of the site for employment use is limited. Frogmore Mill forms part of Paper Trail heritage trail.</p>	<p>Core Strategy para. 20.8: see 'Apsley' above.</p> <p>Frogmore Mill now part of Paper Trail. There is scope to include some B-class space in this building, which could complement the Paper Trail use.</p> <p>All the rest of the GEA (except 1A Frogmore Road: Ebborns Bathroom and Heating Centre) is being promoted for housing in the Site Allocations DPD.</p> <p>Flooding issues currently being investigated. Highways issues may limit housing capacity.</p>	<p>See Figure 5.</p> <p>Retain Frogmore Mill as a GEA (for B1 and B8 use), as scope exists for B-class use in part of site not used by Paper Trail. Exclude from GEA land within the completed Fourdrinier Way housing development.</p> <p>Environmental improvement needed along River Gade and Frogmore Road.</p> <p>Reallocate rest of GEA for housing.</p>
<p>Nash Mills (5.0 ha.)</p> <p>See Figure 6 in</p>	<p>Business, industry</p>		<p><u>Appendix 2: Existing site assessment</u> Main current use: gen. industrial.</p> <p>Average score = 3.4</p>	<p>Housing development under construction.</p> <p>Permission now granted to use the proposed employment space</p>	<p>Delete GEA, as site being redeveloped for housing.</p>

Appendix 2			<p>Recommendation: transfer to other use.</p> <p>Comments: planning consent granted for redevelopment to housing with only 764 m² employment space.</p>	for additional housing.	
<p>Two Waters (8.6 ha.)</p> <p>See Figure 7 in Appendix 2</p>	Business, industry, storage and distribution	Policy 37 encourages environmental improvements.	<p>Paras. 4.31 and 4.32: land either side of A414 is prominent in approach to town centre, but does not provide a quality gateway entrance to the town. Pilling Motors site and surrounding land up to Stratford Way is suitable for a comprehensive gateway entrance.</p> <p><u>Appendix 2: Existing site assessment</u> Main current use: gen. industrial.</p> <p>Average score = 2</p> <p>Recommendation: safeguard for current uses.</p> <p>Comments: suitable for full range of employment uses. Good strategic access to A414 and good commercial prominence.</p>	<p>Core Strategy para. 20.8: see 'Apsley' above.</p> <p>Part of area on both sides of A414 shown as Employment Land Areas of Search (ELAS174 and 175) in Waste Site Allocations.</p> <p>Aldi supermarket built on Pilling Motors site.</p> <p>Planning permission granted (4/02320/14/OUT) for redevelopment of the Symbio House site for mixed uses, including 208 flats and offices.</p> <p>National Grid (NG) land is being promoted for housing through the Site Allocations because:</p> <ul style="list-style-type: none"> • The site is no longer required by NG. • The rest of the NG site is 	<p>Retain GEA (for B1, B2 and B8 use), but delete the following areas (see Figure 7):</p> <p>Area 1: National Grid land, for reasons given in column 5 (allocate for housing, combined with the undeveloped part of Local Plan site TWA5).</p> <p>Area 2: existing houses at 339-353 London Road.</p>

				<p>already proposed for housing (Local Plan site TWA5).</p> <ul style="list-style-type: none"> • There is already housing immediately to the north along London Road. • The rest of the GEA to the SE is at a much higher level. <p>The Council is currently carrying out a study of the Two Waters area, which may result in amended designations in the single Local Plan.</p>	<p>Area 3: Aldi supermarket (allocate as out of centre retail).</p> <p>Area 4: 241 London Road (McDonald's restaurant) and adjoining new housing (Mulberry House).</p> <p>Refer to the Employment Land Area of Search (see column 5), but will apply only within the revised GEA.</p>
TRING					
Icknield Way (6.2 ha.) See Figures 8 and 13 in Appendix 2	Business, industry, storage and distribution	Includes site E6: Miswell Lane (see Schedule of Employment Proposal Sites below)	Paras. 3.55, 4.39 and 4.40: Icknield Way is a successful estate, providing a mix of units for offices, and warehousing/production. Good quality access to A414.	Core Strategy para. 22.8: this GEA will be retained. Proposals for Local Allocation LA5 (Icknield Way, west of Tring) include "extension to the employment area in Icknield Way Industrial Estate".	Amend the GEA boundary (see Figures 8 and 13) by: - removing eastern part of the GEA (site

			<p><u>Appendix 2: Existing site assessment</u> Main current use: gen. industrial.</p> <p>Average score = 1.6</p> <p>Recommendation: safeguard for current uses.</p> <p>Comments: best employment area in Tring. Some potential development land within the estate, which should be protected for industrial development. Potential to extend area into the Green Belt.</p>	<p>Eastern part of GEA along Miswell Lane, including site E6 is not in employment use (see page 67 for further consideration of E6).</p> <p>Shown as an Employment Land Area of Search (ELAS164) in Waste Site Allocations.</p> <p>No applications submitted for development on site E6.</p>	<p>E6); - extending the GEA westwards into LA5.</p> <p>Include the GEA extension (0.75 hectares) on the Schedule of Employment Proposal Sites and the LA5 master plan.</p> <p>Refer to the Employment Land Area of Search (see column 5), but will not apply in the GEA extension.</p>
<p>Akeman Street (0.8 ha.)</p> <p>See Figure 9 in Appendix 2</p>	Business		<p>Para. 4.42: currently mixed B uses in low cost accommodation. Conservation area location. Narrow streets cause problems.</p> <p>Para. 4.49: should be considered for release for alternative use with a small element of new offices/studios. Retain some of</p>	<p>Core Strategy para. 22.8: this GEA will be retained. Also: "Akeman Street will provide for a range of non-residential uses, including social and community facilities".</p> <p>The haulage yard in Langdon Street has been purchased for</p>	<p>Exclude the Langdon Street haulage yard from the GEA and allocate for housing (see Figure 9).</p> <p>Rest of GEA</p>

			<p>the newer offices on Akeman St.</p> <p><u>Appendix 2: Existing site assessment</u></p> <p>Main current use: gen. industrial.</p> <p>Average score = 3.4</p> <p>Recommendation: consider transfer to other use (B or non-B).</p> <p>Comments: restricted access, surrounded by housing, constrained site/shape. Fully occupied and provides useful small unit space. Transport depot potential for relocation and change of use.</p>	<p>housing development – planning application for housing development submitted. The rest of the GEA may come onto the market.</p>	<p>should be retained (for B1 use). A range of uses should be accepted (to reflect Core Strategy), but should remain ancillary to main B1 use.</p>
Brook Street (0.8 ha.)	Industry		<p>Para. 4.43: This GEA is situated within a listed mill, surrounded by residential development. Road access is very poor, at a pinch point (on street parking causes problems).</p> <p>Para. 4.50: main building may be capable of conversion to housing: sympathetic employment accommodation could possibly be retained elsewhere on site.</p>	<p>Core Strategy para. 22.8: this GEA will be retained.</p>	<p>Retain GEA (for B1 use), as is well occupied by several small firms.</p> <p>B2 not appropriate given proximity to housing.</p>

			<p><u>Appendix 2: Existing site assessment</u> Main current use: gen. industrial.</p> <p>Average score = 3.4</p> <p>Recommendation: consider transfer to other use (B or non-B).</p> <p>Comments: local access restricted, poor sightlines. High density small units. Listed building imposes constraints. Good occupancy. Could remain in employment use, but longer term conversion to residential more likely.</p>		
ELSEWHERE					
<p>Markyate (Hicks Road) (2.8 ha.)</p> <p>See Figure 10 in Appendix 2</p>	<p>Industry, storage and distribution</p>	<p>Policy 37 encourages environmental improvements.</p> <p>Policy 33 proposes housing on the existing employment land to the</p>	<p>Para. 4.54: there is a case for maintaining or even increasing employment in Markyate.</p> <p>Paras. 4.55, 4.56: site has direct access to A5. Mostly older buildings, mix of offices, industrial and storage – useful source of cheap accommodation. Newer space off Sharose Court.</p>	<p>Core Strategy para. 25.6 and Strategic Site SS2 proposes a mixed use redevelopment including “business, light industrial (Class B1c and storage and distribution units (Class B8)”, with new commercial units for small and medium enterprises.</p> <p>The Hicks Road Masterplan (updated June 2012) was</p>	<p>A revised GEA should be defined for B1 and B8 use (total area about 0.7 ha.; see Figure 10). B2 not appropriate given proximity to housing.</p>

		south on London Road.	<p>Para. 4.56: north of Hicks Road could be considered for alternative use. South of Hicks Road: retain for employment use.</p> <p><u>Appendix 2: Existing site assessment</u> Main current use: gen. industrial.</p> <p>Average score = 2.4</p> <p>Recommendation: transfer to other use. Comments: good road access. North side potential for redevelopment for alternative use; southern part should be retained for employment.</p>	<p>prepared by the landowners' agents, in collaboration with DBC. However, it has not been approved by the Council.</p> <p>Mixed use redevelopment of most of site (1.9 ha.) for housing and other uses is under construction, with Sharose Court retained and extended for employment use. This permission (4/01173/11/MFA) excludes part of land north of Hicks Road.</p> <p>No proposals have come forward for housing development on the Policy 33 site in London Road.</p>	<p>The GEA should cover:</p> <ul style="list-style-type: none"> - Sharose Court; and - the site in London Road (Marvin's Magic etc.) proposed for housing in Local Plan Policy 33 <p>The rest of the existing GEA should be deleted, as it is being developed or is proposed for non B-class uses.</p>
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POLICY 32: EMPLOYMENT AREAS IN THE GREEN BELT

Bourne End Mills (3.4 ha.) See Figure 11 in Appendix 2	Industry, storage and distribution	Designated as an Employment Area in the Green Belt (EAGB) and a Major Developed Site in the	<p><u>Appendix 2: Existing site assessment</u> Main current use: gen. industrial.</p> <p>Average score = 1.8</p> <p>Recommendation: safeguard for current use.</p>	<p>Core Strategy: Table 2 shows the site on current list of MDSs. CS Policy CS5 allows for redevelopment of MDSs</p> <p>CS para. 26.8: any future development of this site will have to balance economic considerations with the need to</p>	<p>Retain as an EAGB (for B1, B2 and B8 use) – see Figure 11.</p> <p>Amend the EAGB boundary to reflect extent of development</p>
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		<p>Green Belt (MDS).</p> <p>The MDS boundary excludes part of the EAGB in S/SE of site.</p> <p>Substantial environmental improvement; rationalisation of layout; access from Bourne End Lane to be closed.</p>	<p>Comments: good strategic and local access off A41. Planning consent for redevelopment of part.</p>	<p>protect the countryside.</p> <p>Planning permission (4/02524/08/MOA and 4/02245/12/VOT) granted for redevelopment for B1c, B2, B8 units (15,500 m²; net gain of 3,550m²), but unlikely to be implemented. This permission excludes units 28, 30 and 31 fronting Upper Bourne End Lane.</p> <p>A revised application (4/03072/15/MFA), for B1 and/or B8 (6,407 m²) and up to 45 homes has been submitted, but the Council is not committed to accepting any housing development.</p>	<p>approved under 4/02524/08, including deletion of 44 Bourne End Lane, which is a house. Also, amend the MDS boundary to show a revised area for infilling.</p>
<p>Bovingdon Brickworks (2.9 ha.)</p> <p>See Figure 12 in Appendix 2</p>	<p>Industry, storage and distribution</p>	<p>Designated as an Employment Area in the Green Belt (EAGB) and a Major Developed Site in the Green Belt (MDS). Policy 37</p>	<p><u>Appendix 2: Existing site assessment</u></p> <p>Main current use: gen. industrial.</p> <p>Average score =2.6</p> <p>Recommendation: safeguard for current use.</p> <p>Comments: existing use as brickworks/builders merchants.</p>	<p>Core Strategy: Table 2 shows the site on current list of MDSs. CS Policy CS5 allows for redevelopment of MDSs.</p> <p>CS para. 26.8: any future development of this site will have to balance economic considerations with the need to protect the countryside.</p> <p>Bovingdon Brickworks are the</p>	<p>Retain as an EAGB (and MDS), but extend the boundary to better reflect current extent of employment uses (see Figure 12).</p> <p>Do not include</p>

		encourages environmental improvements.		major occupiers, but other firms (including motor trade uses) occupy NE part of site. The area covered by employment uses is considerably larger than the Local Plan EAGB and MDS designations.	land used for storage of bricks to SE of public footpath.
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2. Policy 33: Conversion of employment land to housing and other uses

Table of main areas with employment use where housing development is encouraged		
Area	Current situation	Site Allocations: issues and recommended way forward
BERKHAMSTED		
Gossoms End (West)	Housing completed.	None (as development completed).
Gossoms End (East) / Stag Lane (East)	NW part of site (corner of Stag Lane): housing completed. SE part of site: retirement housing completed recently.	None, as housing development has taken place.
HEMEL HEMPSTEAD		
Two Waters and Apsley		
Ebbens Road	Partly redeveloped for housing, partly still in employment use.	Show land still in employment use as a housing allocation.

TRING		
Western Road	<p>Concept Statement for site (proposing housing) approved by Council as Supplementary Planning guidance (February 2006).</p> <p>Small part of site redeveloped for housing, rest still in employment use. Partial conversion to housing permitted within one office building.</p>	Show land still in employment use as a housing allocation.
ELSEWHERE		
<p>Markyate (London Road)</p> <p>See Figure 10 in Appendix 2.</p>	<p>Still in employment use (including Marvin's Magic).</p> <p>Adjoins Hicks Road site (see above).</p>	Designate site and Sharose Court as a GEA (see text on Markyate (Hicks Road) above) – see Figure 10.

3. Schedule of Employment Proposal Sites

Site ref.	Address	Proposal	Current situation	Site Allocations: issues and recommended way forward
BERKHAMSTED				
E1 (1.4 ha.)	Northbridge Road	Extension of existing estate for business, industry and storage and distribution unit	Development completed (Canalside).	None (as development completed).

HEMEL HEMPSTEAD				
E2 (2.8 ha.)	Buncefield Lane (west)/ Wood Lane End (south) (Kodak Sports Ground)	Industry and storage and distribution	Still undeveloped. Forms part of the Maylands Gateway site (see Core Strategy Figures 18 and 22). Currently being marketed by the Homes and Communities Agency.	Consider in East Hemel Hempstead Area Action Plan (EHHAAP) or single Local Plan.
E3 (2.9 ha.)	Boundary Way (north)	Industry and storage and distribution	Development completed (Amazon and others).	None (as in EHHAAP area and development completed).
E4 (16.6 ha.)	Three Cherry Trees Lane (east)	Specialised technological industries and or other activities in the national or regional interest	Still undeveloped. Now proposed mainly for housing (Spencer's Park phase 2 – see Core Strategy). A master plan is currently being prepared. Up to around 1.9 hectares of employment land (c. 8,000 m ² built floorspace) is likely to be proposed in the south of the site, where proximity to the Buncefield oil terminal rules out housing.	Consider in EHHAAP or single Local Plan.
E5 (2.0 ha.)	Boundary Way (east)	Industry and storage and distribution	Development completed.	None (as in EHHAAP area and development completed).

Two Waters and Apsley				
TWA7 (2.32 ha.)	Former John Dickinsons, London Road	Reuse of buildings to create visitor centre and museum (at least 0.6 ha.) for Paper Trail; and related mixed employment development (see Local Plan page 383 for details)	Most of site has been developed for housing, hotel and public house (see Apsley Mills GEA above). DBC has purchased 0.38 ha. (next to Homebase) for new Council housing. Planning permission granted for housing development. There is no potential for new build employment development.	Delete as an employment proposal site. Show the land next to Homebase as a housing allocation.
TRING				
E6 (0.8 ha.) See Figures 8 and 13 in Appendix 2	Miswell Lane	Extension of existing estate for business, industry or storage and distribution	Undeveloped, except for two or three houses and disused car repairs building in north of site. No applications have been submitted for development of the rest of the site. It is understood that the site is likely to be brought forward for development.	Reallocate for housing, as: <ul style="list-style-type: none"> • Miswell Lane is a residential road. • The Miswell Lane/ Icknield Way road junction is poor. • It is unlikely that access could be obtained directly from the industrial estate. • Need to take account of proposed extension (0.75 ha.) of Icknield Way Industrial Estate on LA5.

4. Other Areas and Sites Assessed in SW Hertfordshire Employment Land Update

The sites and areas in the table below were assessed in Appendix 2 'Existing Site Assessment' of the SW Hertfordshire Employment Land Update (Roger Tym & Partners, June 2010):

Location	RTP assessment (2010)	Current situation	Site Allocations: issues and recommended way forward
Hemel Hempstead Town Centre	<p>Main current use: other mixed</p> <p>Average score: 2.6</p> <p>Recommendation: transfer to mixed use.</p> <p>Comments: town centre employment floorspace = 101,000 m² (including 81,000 m² offices). Main office areas are Kodak tower, Marlowes central area, Civic Centre and part of Paradise. Mainly small/medium units, except Kodak and public sector offices. Ideally suited for small professional offices, less demand for large offices/single occupiers. Issues with restrictive parking standards and poor access to railway station.</p> <p>RTP report paragraphs 4.8-4.13: no proven demand for more town centre office space, but target for large office growth and some of this should be in the town centre. New offices should be focussed around the proposed civic and college buildings. Around 9,000-12,000 m² offices could</p>	<p>The town centre is seeing a significant loss of offices to housing e.g. Kodak building (already converted) and prior approval schemes in Waterhouse Street.</p> <p>Core Strategy: Policy CS33 (Hemel Hempstead Town Centre) - principles guiding development include 1 (e) 'create new offices'. Figure 17 gives some guidance on potential broad locations for business uses.</p> <p>Hemel Hempstead Town Centre Masterplan 2011-2021: no major office development is proposed. Main references to offices/business use are as follows:</p> <ul style="list-style-type: none"> • Paragraph 4.2.9: redevelop existing vacant low quality offices in the Marlowes Shopping Zone to provide housing. 	<p>No specific office allocations proposed.</p> <p>Include a mixed use allocation for offices and other uses in the northern part of the Gade Zone (including the Public Service Quarter).</p> <p>Paradise: see text on Paradise GEA above and Figure 2.</p>

	<p>be provided over the plan period.</p>	<ul style="list-style-type: none"> • Section 5.2: new Public Service Quarter (which will include replacement of the Civic Centre) and leisure, retail, business, culture and housing around Market Square; • Section 5.4: Paradise employment area will become a mixed use development with business/light industrial uses and new housing. 	
<p>Berkhamsted Town Centre</p>	<p>Main current use: other mixed</p> <p>Average score: 2.2</p> <p>Recommendation: none stated.</p> <p>Comments: there are several purpose built offices and conversions, occupied by local businesses and some providing a regional/national service. Larger units should be protected. There is little obvious scope for new employment development.</p> <p>RTP report paragraphs 3.47-3.51: these paragraphs provide information on Berkhamsted's office market. Berkhamsted is a small office market, in good health with no evidence of over-supply. If this remains the case, existing offices should generally be safeguarded provided they are attractive and suitable.</p>	<p>As stated in RTP report. No significant proposals.</p>	<p>No specific office allocations proposed</p>

<p>Tring Town Centre</p>	<p>Main current use: other mixed</p> <p>Average score: 2.4</p> <p>Recommendation: none stated.</p> <p>Comments: Tring town centre is significantly smaller than Berkhamsted. There is little purpose built office accommodation except Akeman Street, with most space in converted premises. There is little potential for new development.</p> <p>RTP report paragraphs 3.59-3.61: these paragraphs indicate that Tring's office market is broadly in balance, but there appears to be an oversupply of smaller office space in the town centre.</p>	<p>No significant proposals.</p>	<p>No specific office allocations proposed</p>
<p>Boxted Farm, Berkhamsted Road, Potten End (0.3 ha.)</p>	<p>Main current use: strategic warehousing</p> <p>Average score: 3.0</p> <p>Recommendation: safeguard for current use (e.g. gen. industrial, offices).</p> <p>Comments: planning permission for change of use – farm buildings to warehousing.</p>	<p>Used for industrial and storage purposes.</p>	<p>Too small to include in Site Allocations.</p>
<p>Woodwells Farm, adj. Buncefield Lane Hemel</p>	<p>Main current use: strategic warehousing</p> <p>Average score: 1.6</p>	<p>The precise location of this site is not clear. However, it is within the Maylands Gateway Area, so is covered in the Maylands Gateway Development Brief</p>	<p>Consider in East Hemel Hempstead Area Action Plan (EHHAAP) or</p>

Hempstead	<p>Recommendation: safeguard for current use.</p> <p>Comments: planning permission for 2,725 m² B8 gain.</p>	and in Appendix 3 below.	single Local Plan.
Sunderlands Yard, Church Lane, Kings Langley	<p>Main current use: mixed employment</p> <p>Average score: 2.6</p> <p>Recommendation: consider transfer to other use (B or non-B).</p> <p>Comments: reasonable location for employment, including yard area. Access restricted by on-street parking. Long term pressures for alternative use such as housing.</p> <p>RTP report paragraphs 4.73-4.76: one reason for suggesting the release of Sunderland Yard in the long term only is that it includes a yard, which is an element of secondary employment space in short supply. Part of the land adjacent to Buncefield should be made available for such accommodation.</p>	<p>Still in employment use. No proposals submitted for housing.</p> <p>The Local Plan shows the site within a residential area, so housing development is acceptable in principle.</p>	<p>Do not allocate for housing, as this is a useful employment site. Keep the site in the residential area, so housing will remain acceptable in principle.</p> <p>Phasing is an issue if site is allocated for housing. It would be difficult to justify delaying housing until new yards are provided elsewhere, particularly as no decisions have been made on the land adjacent to Buncefield (which is in St Albans District).</p>

APPENDIX 2: Proposed Changes to Employment Areas and Sites

General Employment Areas

Figure 1: Billet Lane, Berkhamsted

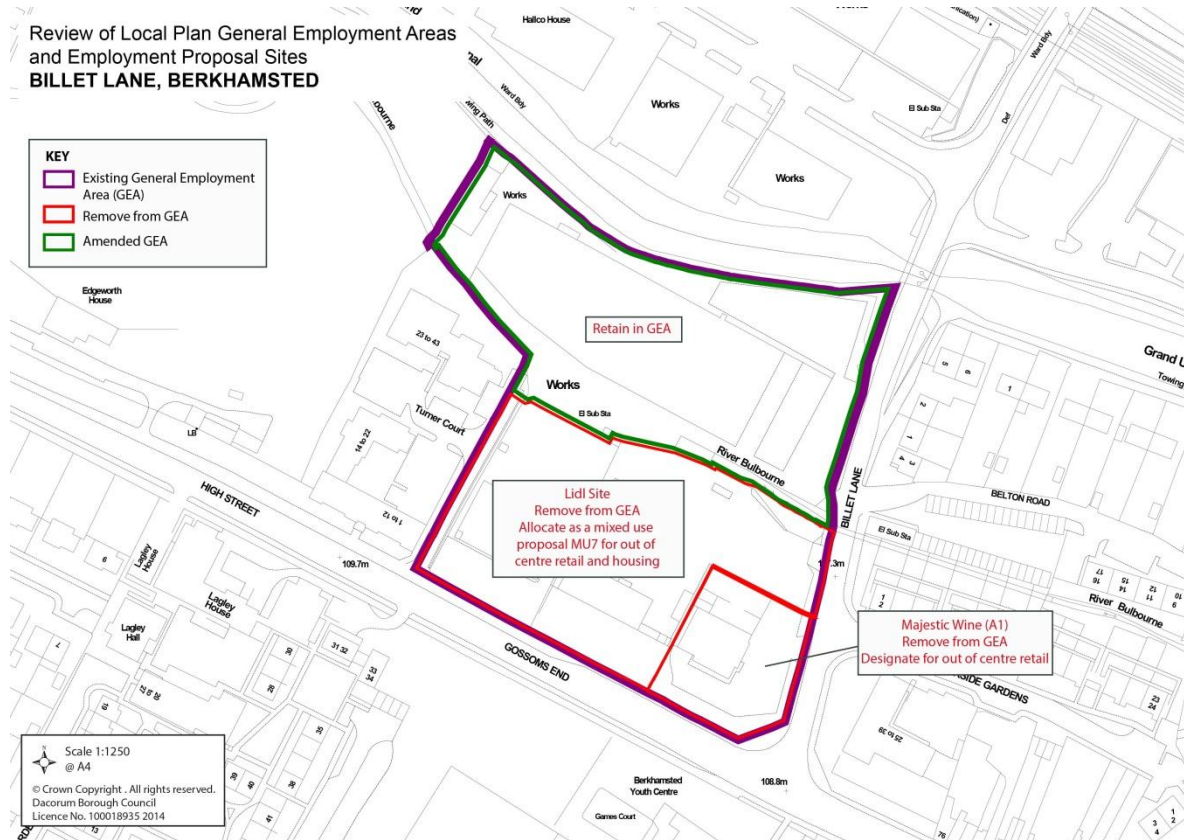


Figure 2: Paradise/Wood Lane End, Hemel Hempstead:

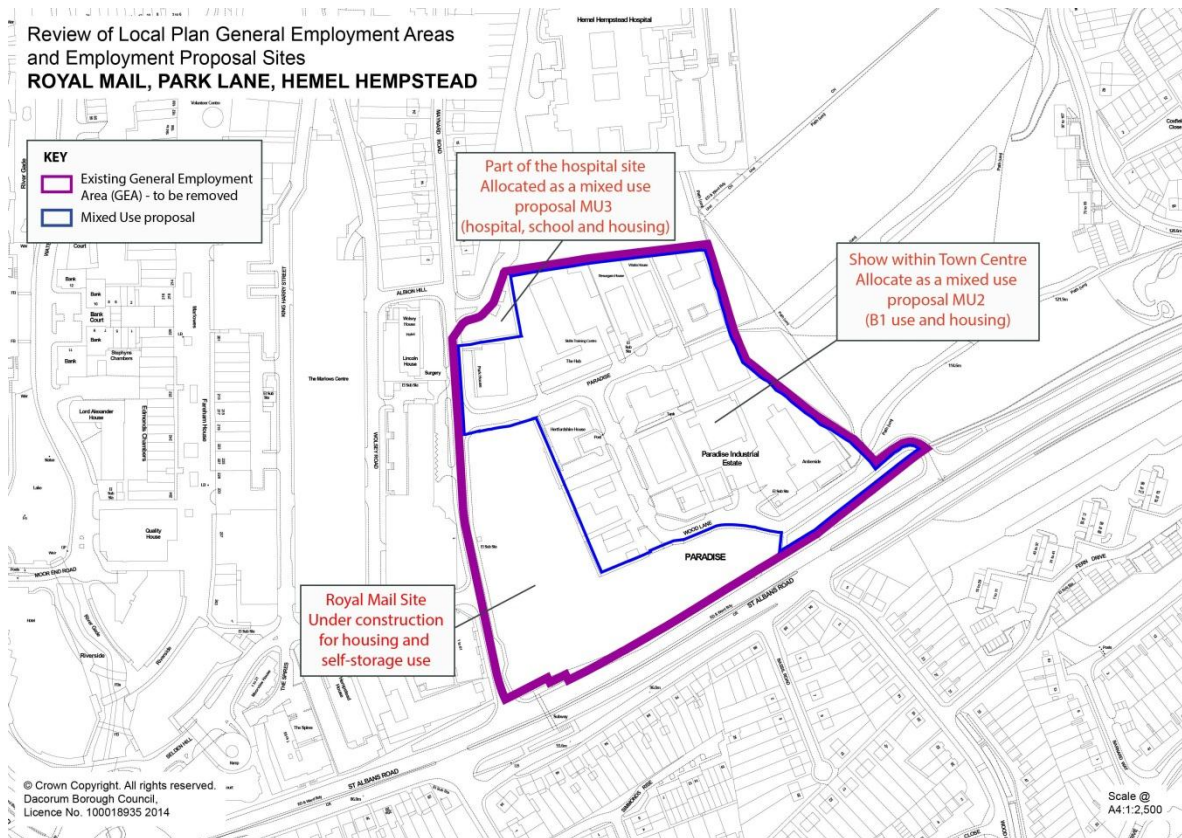


Figure 3: Apsley Mills, Hemel Hempstead

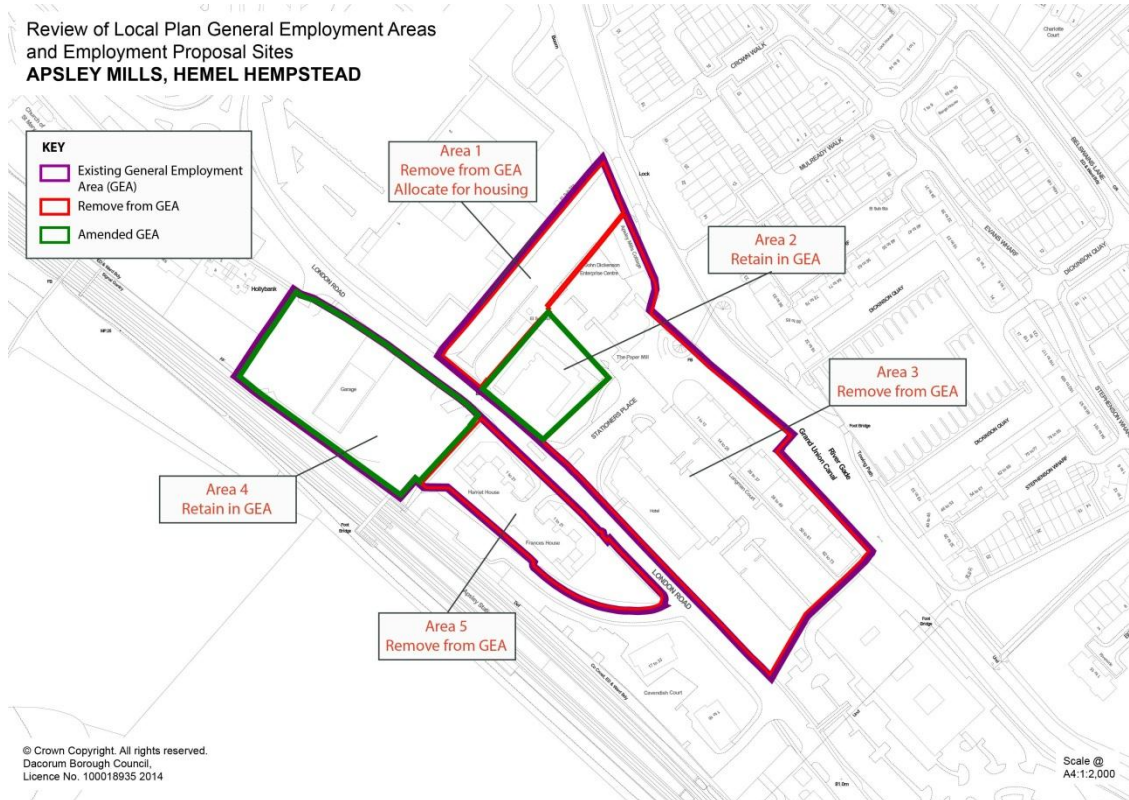


Figure 4: Corner Hall, Hemel Hempstead

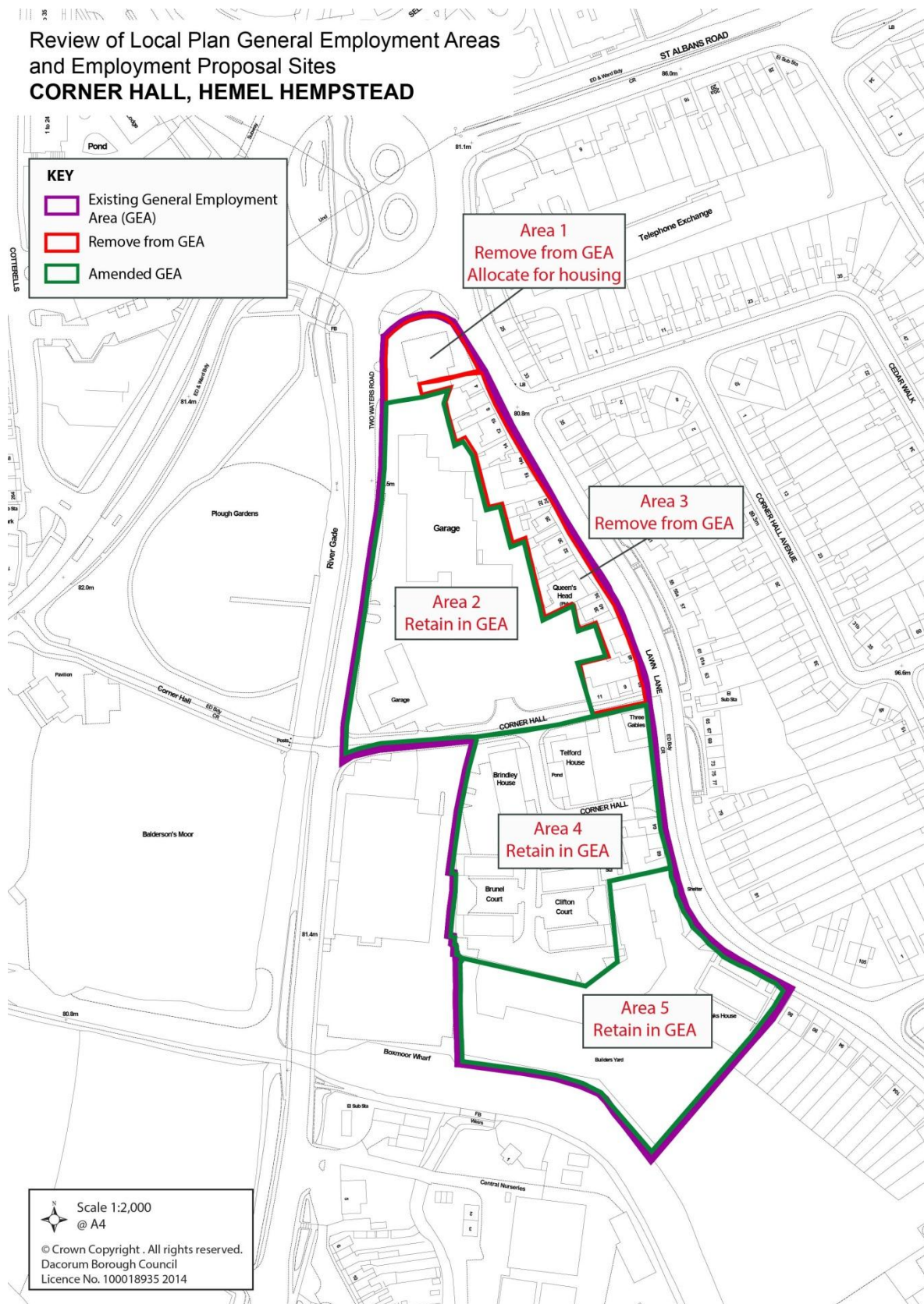


Figure 5: Frogmore, Hemel Hempstead

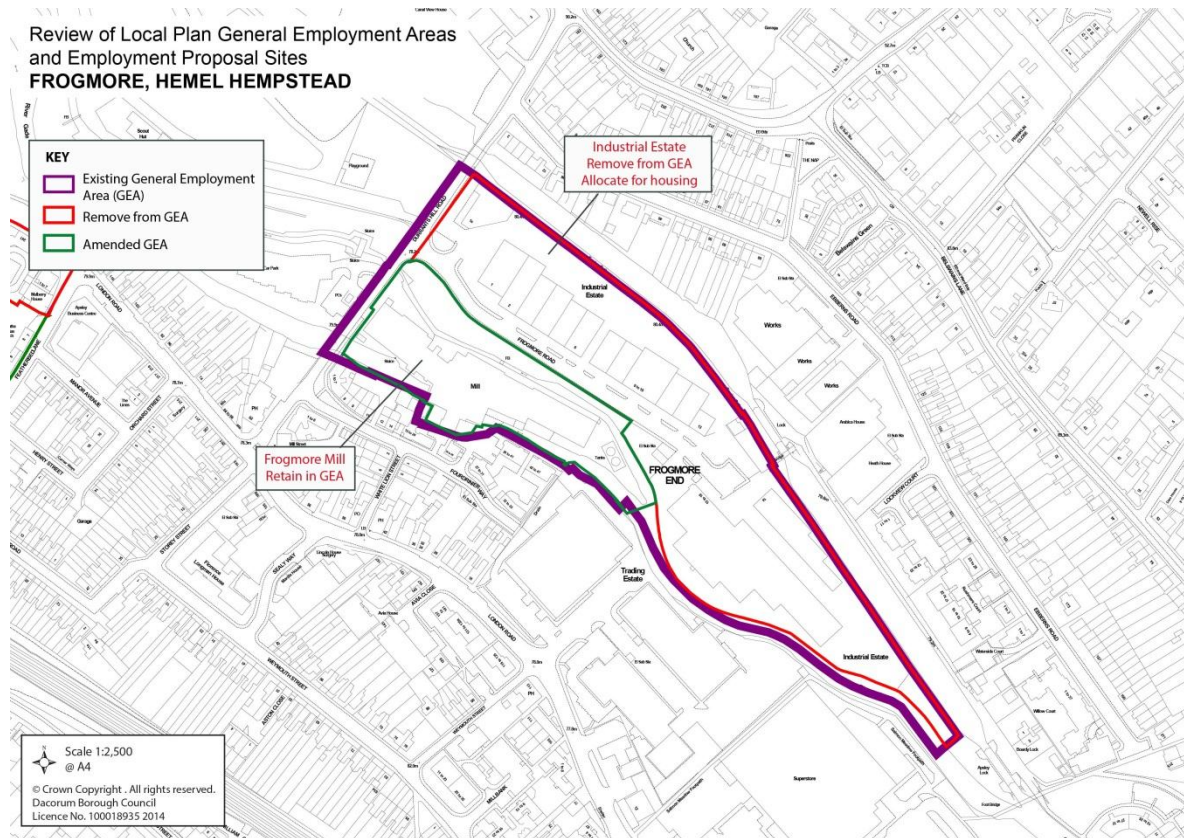


Figure 6: Nash Mills, Hemel Hempstead

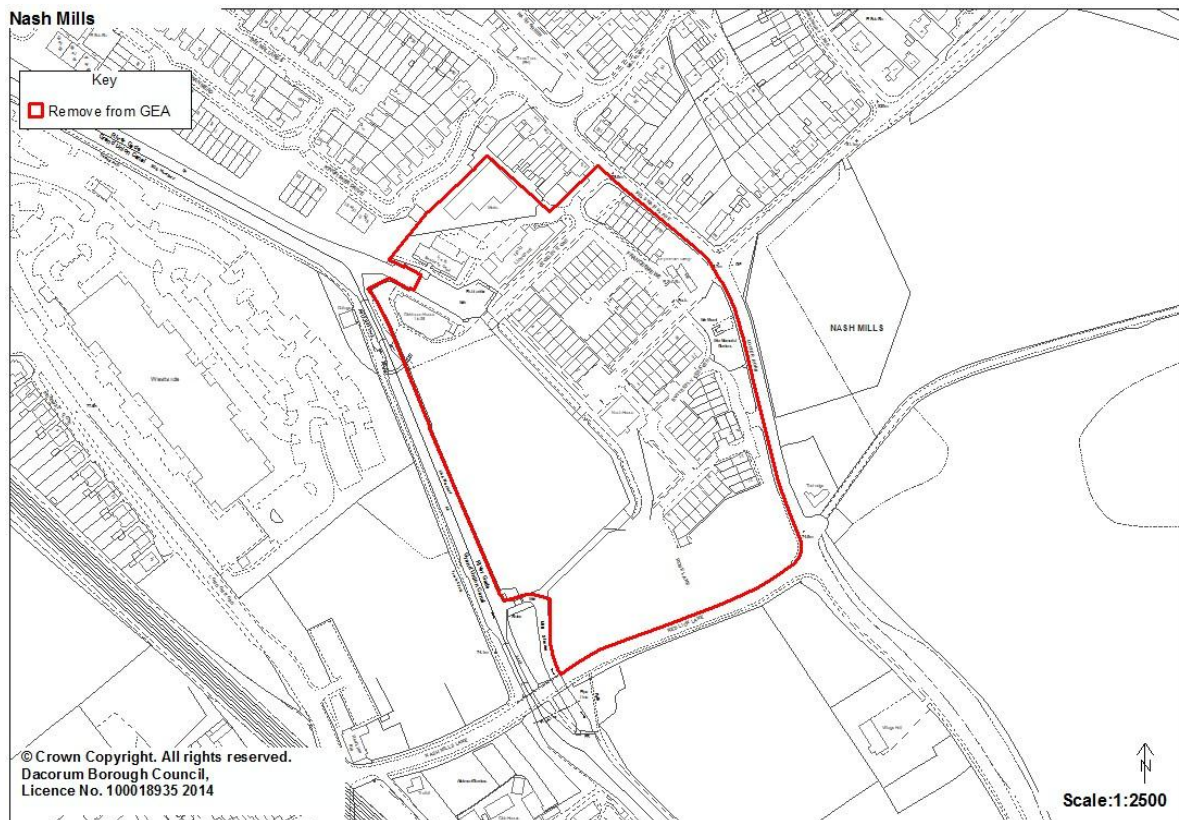


Figure 7: Two Waters, Hemel Hempstead

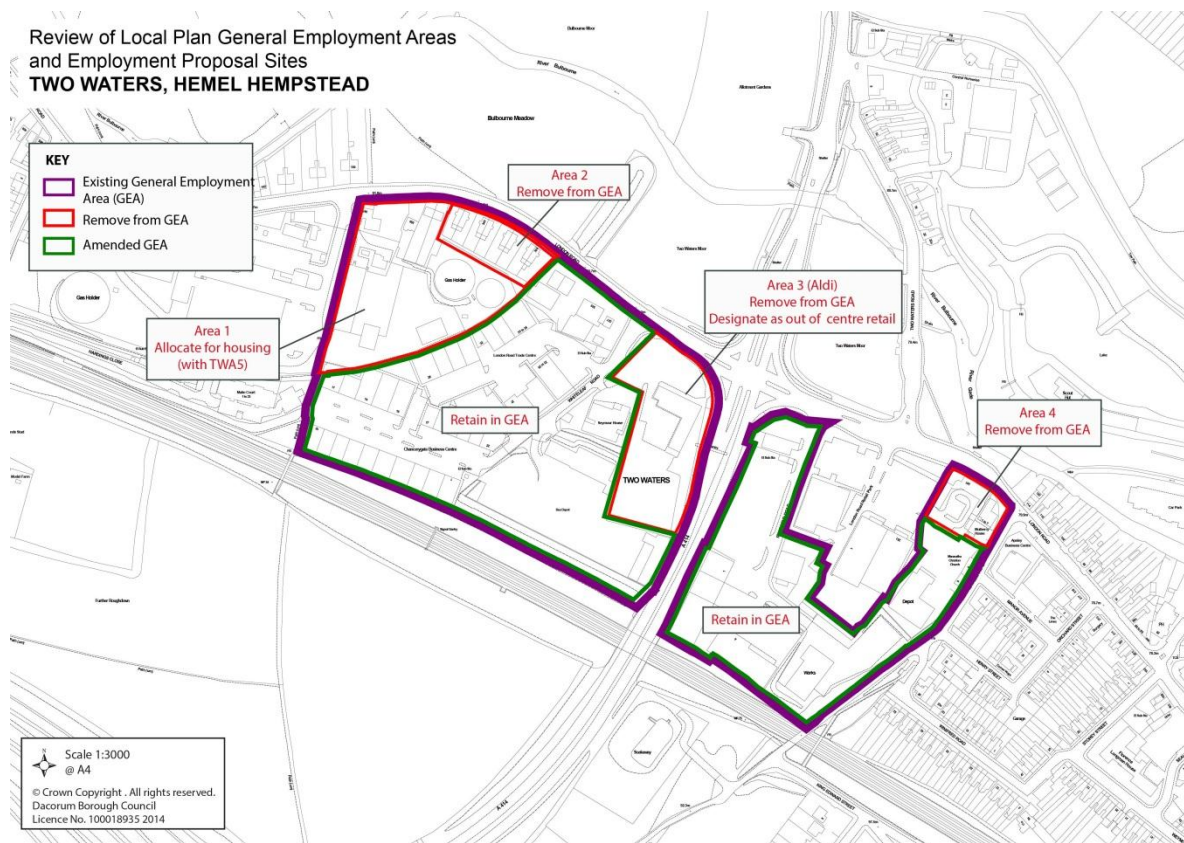


Figure 8: Icknield Way, Tring

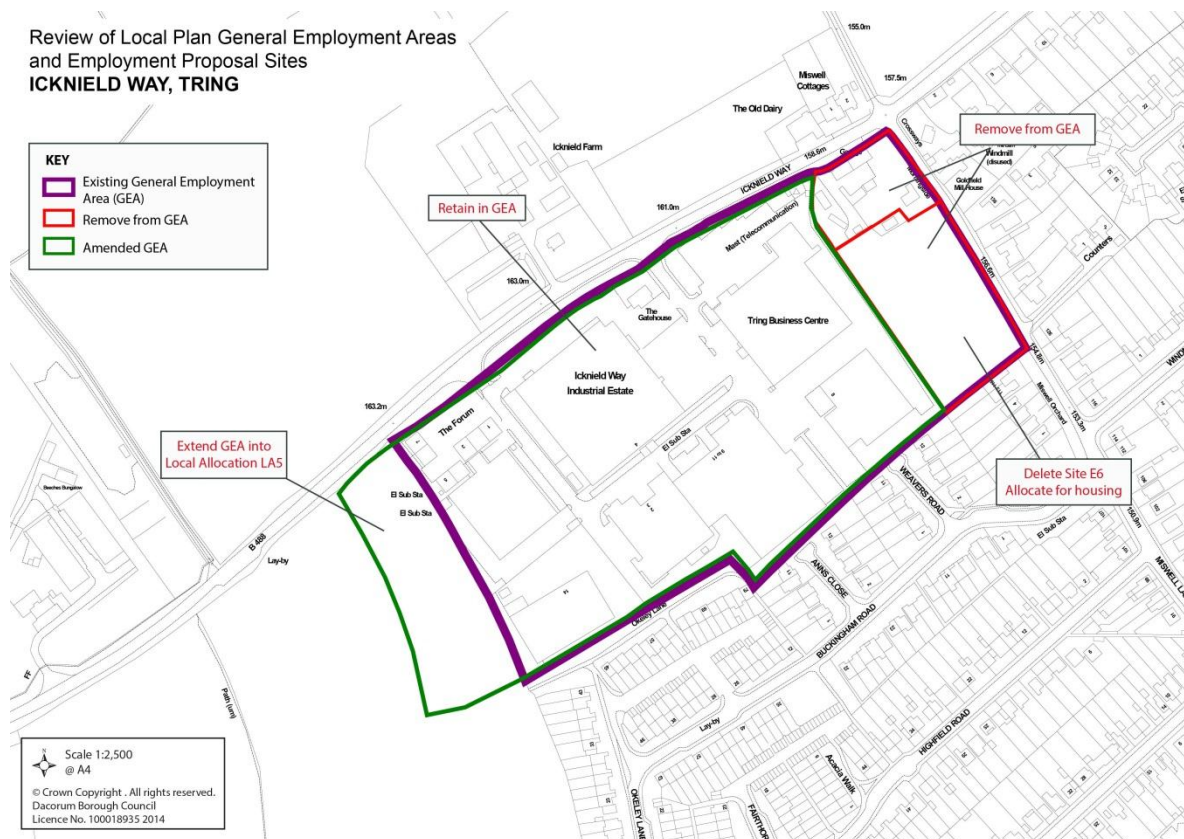


Figure 9: Akeman Street, Tring

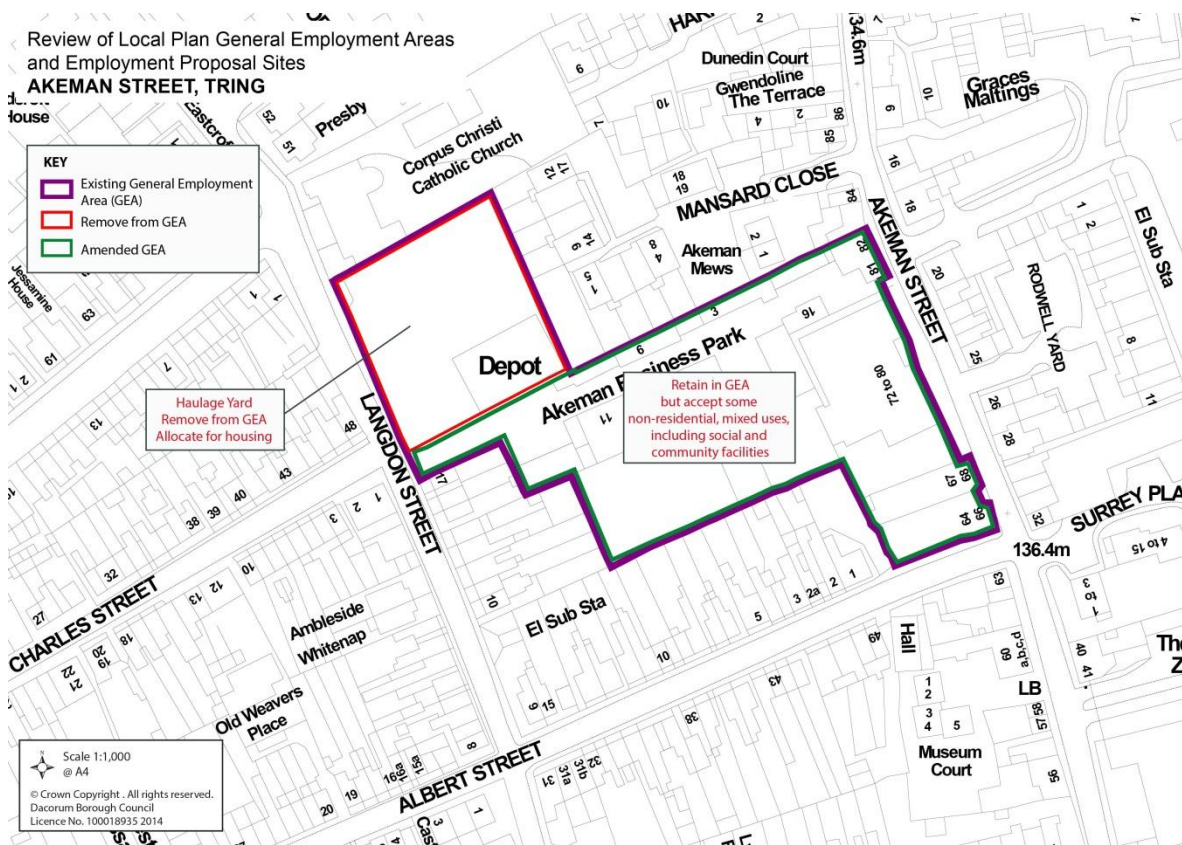
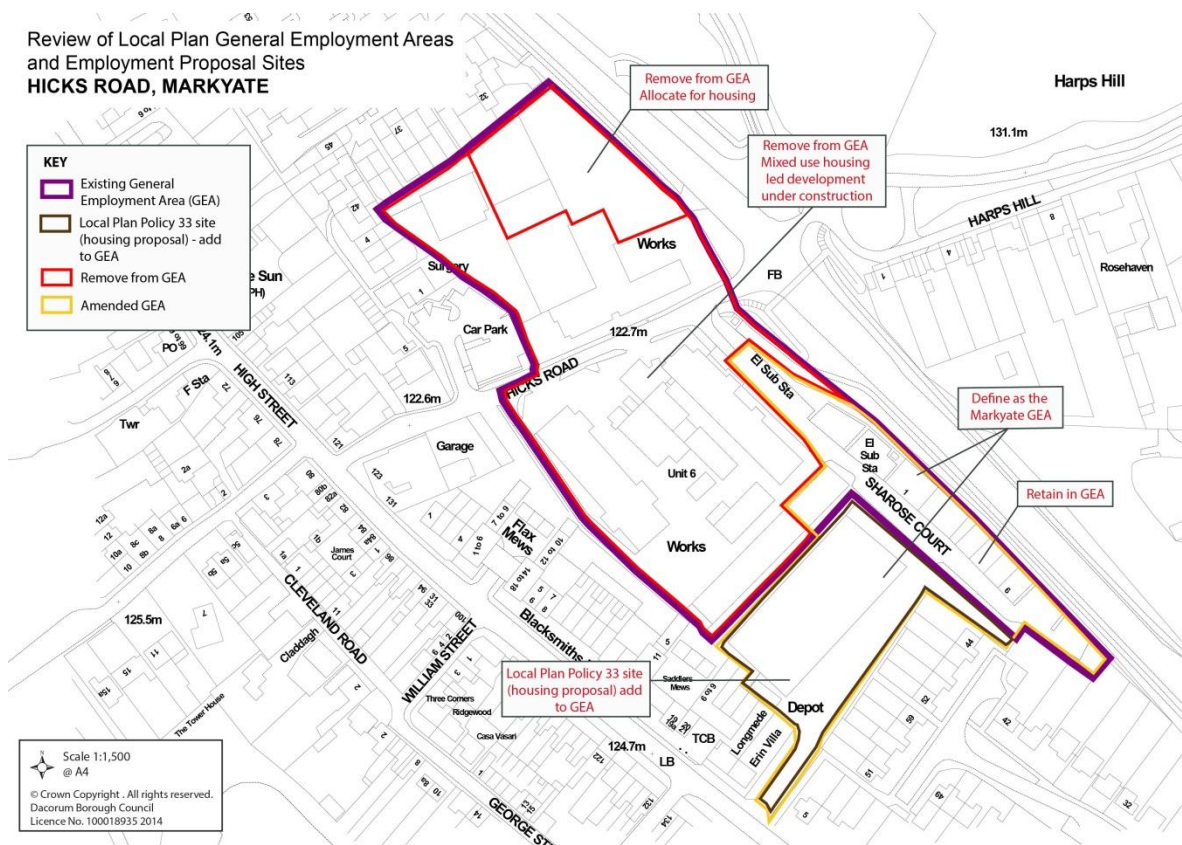


Figure 10: Hicks Road, Markyate



Employment Areas in the Green Belt

Figure 11: Bourne End Mills, Hemel Hempstead

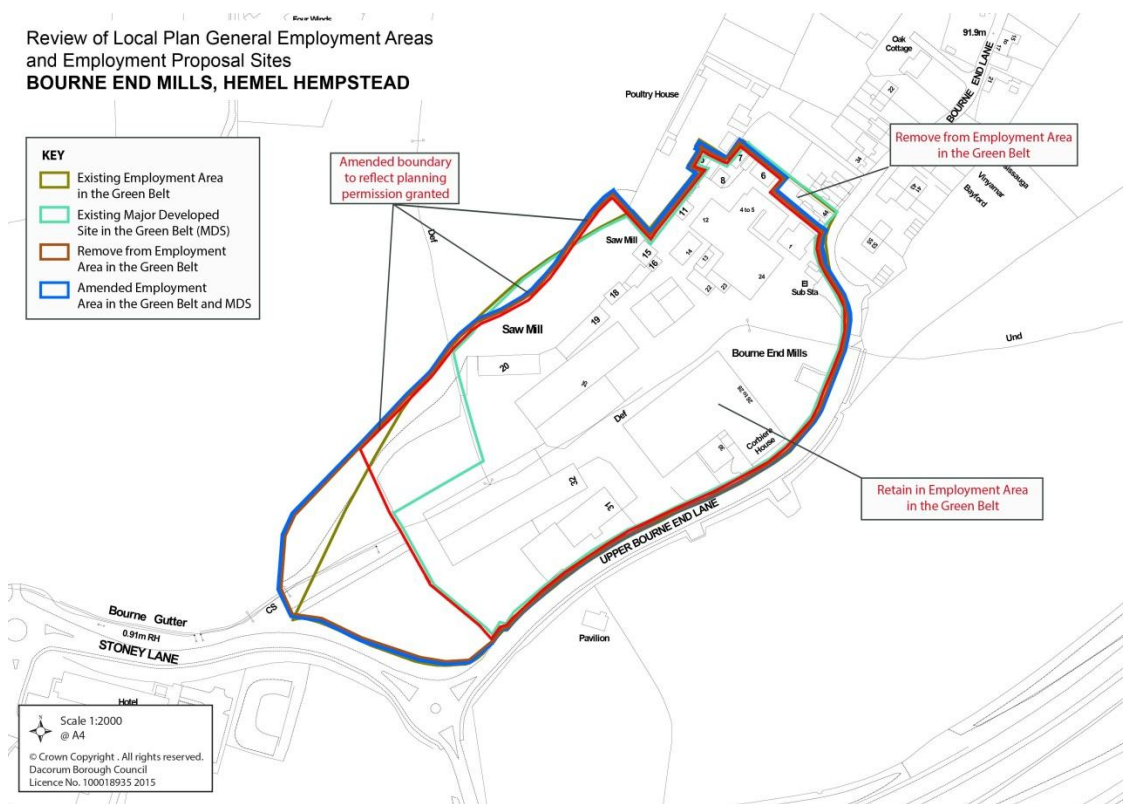
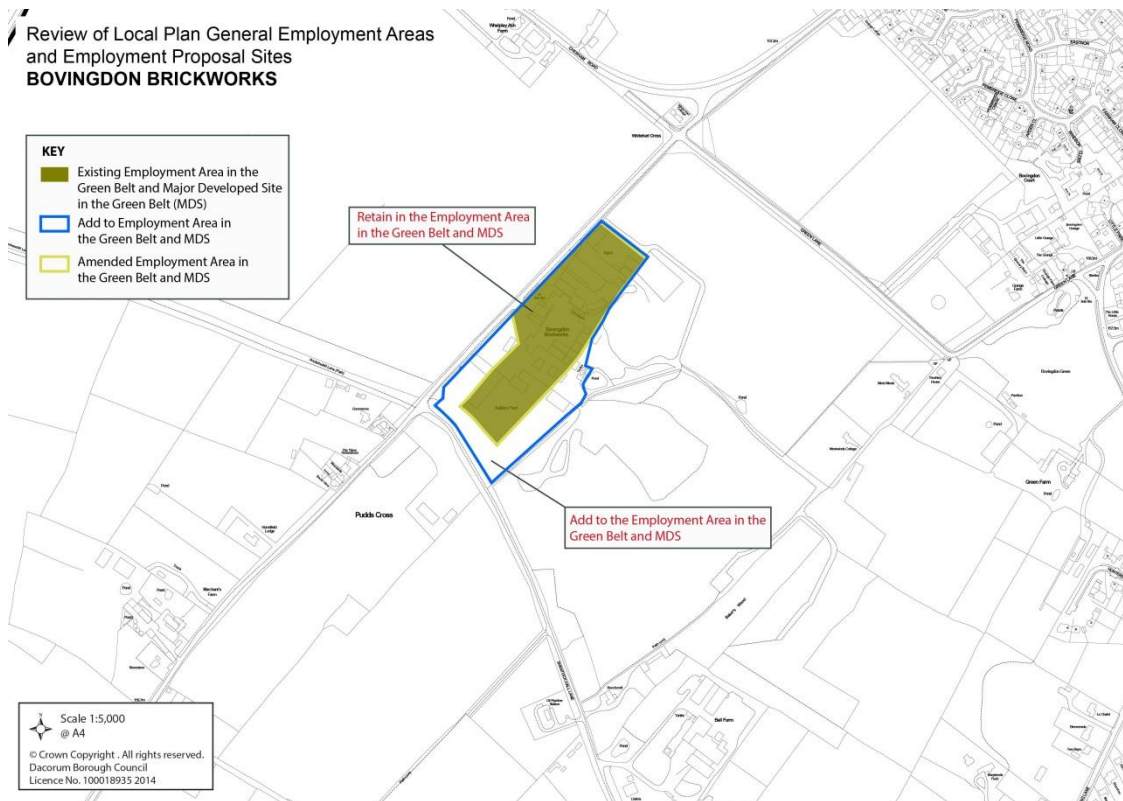
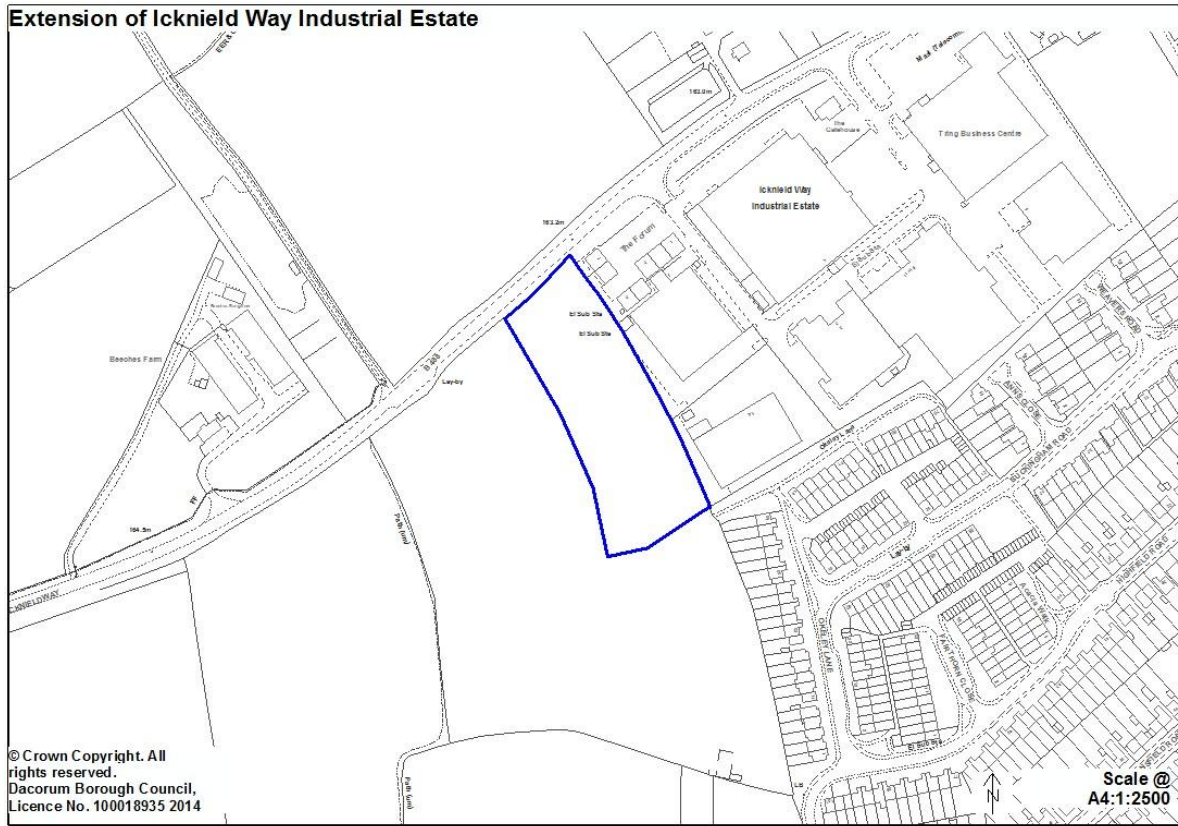


Figure 12: Bovingdon Brickworks



Employment Proposal Site

Figure 13: E1 Extension of Icknield Way Industrial Estate, Tring



APPENDIX 3: Dacorum Employment Land Supply on Major Sites (January 2016)

The schedule below provides information on sites where there is potential for gains or losses of over 1,000 m² of B-class floorspace from 31 March 2015.

	Site area (ha.)	Permission ref. (lapse date)	Floorspace change m ² from 31.03.15		Comments
			B1(a) & (b)	B1(c), B2, B8	
Hemel Hempstead					
1. Maylands Business Park					
Units E & F, Maylands Wood Estate, Maylands Avenue (The 'Vision' site)	1.19	4/03986/15		5,760	Cleared site. Site sold recently to St James. A planning application has been submitted for two industrial units,
Golden West Foods Ltd (former Keystone site), Boundary Way	2.82	4/01148/12		152	Cleared site, following Buncefield explosion. Redevelopment for mixed industrial use: three options permitted under 4/01148/12 (12,685, 13,443 and 13,928 m ²). Employment Land Position Statement No.39 shows a gain of 14,000m ² . This permission is unlikely to be implemented. The site is now owned by the Murphy Group, who wants to use the site for open storage. A planning application (4/02184/14/MFA) for change of use to B8 open storage was submitted, but later withdrawn. Proposed floorspace was

					only 152 m ² .
Shroff (UK) Ltd., 47 Maylands Avenue	0.59	4/01972/ 13 (06/17)	671	1,193	Permission granted for B1 (829 m ²), B8 (1,250 m ²) and A3/A5 (KFC).
Desoutter Building, Maxted Corner, Eaton Road	0.78	4/00305/ 12		-8,324 7,816	Change of use B8 to B2 permitted (involves some demolition).
Between Hemel One and Pentagon Park (Plot A), Boundary Way	0.80	4/02047/ 14	880		Cleared site. A B8 unit (3,366 m ²) has been permitted (4/01310/11), but this permission is unlikely to be implemented. Permission granted (4/02047/14/MFA) for a phased development. Phase 1 involves a private health clinic (1,812 m ²), which would provide about 50 jobs, including around 30 ancillary office jobs. The firm intends to open clinics elsewhere in the future. If so, the Hemel site will be the HQ and phase 2 will be implemented, comprising offices (880 m ²). In column 4 it is assumed that the offices are built.
Viking House, Swallowdale Lane	0.82	4/01077/ 13 4/01332/ 13	-1,902		Conversion offices to housing with extension permitted. Not started. A planning application (4/02772/15/MFA) has been submitted to redevelop the site for housing purposes.
The Campus, 150 Maylands Avenue (Gyron)	3.78	4/01399/ 13	9,093	23,358	Mixed use development permitted for Gyron, including HQ offices and data storage facility. The previous offices have been demolished and construction of the data storage element of the Gyron scheme is under construction.

Former Catherine House, Boundary Way	0.44	4/00031/13	1,495	376	Vacant site. Permission granted for industrial building (Use Class B1, B2 and B8). Under construction.
TDS Buildings, Mark Road	0.38	4/00094/15		-1,315	Planning permission has been granted for a change of use from warehousing and ancillary offices (B8) to retail, workshop, warehouse and showroom use (sui generis use). This permission has been implemented, with the building now occupied by Three Counties Timber & Building Supplies.
Century House, 100 Maxted Road (corner of Maylands Avenue)		4/02107/15	220	2,400	Smiths Detection has been granted planning permission for extensions to the existing buildings, providing additional office floorspace (220 m ²) and warehousing (2,400 m ²).
Mark House, 36 Mark Road		4/02121/15	-1,360		Planning permission has been granted for a change of use from offices to a D2 low cost gymnasium.
Heart of Maylands, Sites 1 and 2 (SE area) See Heart of Maylands Development Brief (October 2010): http://www.dacorum.gov.uk/docs/default-source/regeneration/heart-of-maylands-development-	4.0	4/00676/14/MFA 4/00689/14/OUT 4/00699/14/DEM	-2,300	7,593 (Sites 2b & 2c) -3,100 (Site 2d)	Existing uses: Sites 1 and 2a in Heart of Maylands Development Brief: construction site; Sites 2b-2d: industrial/warehousing use. The site is being developed in phases: Phase A (Sites 1 and 2a): planning permission granted (4/00676/14/MFA) - mixed Class-A uses; housing; church. Retail units may include some B1(a) use (units 1 & 2 are most suitable for offices: 174 m ²). Under construction. Phase B (Sites 2b & 2c): planning application submitted for housing (4/00689/14/OUT). One building (1,480 m ²) is proposed for either flats or offices subject to demand. This

brief.pdf?Status=Master&sfvrsn=0					<p>proposal involves the loss of 7,593 m² B8 floorspace.</p> <p>Housing likely in longer term on Site 2d (currently occupied by a building with around 2,300 m² offices and 3,100 m² industrial/warehousing space).</p> <p>Phase A owned by Hightown Housing Association.</p> <p>Phase B owned by CBRE (different pension funds).</p>
<p>Heart of Maylands, Site 3 (NW area)</p> <p>See Heart of Maylands Development Brief</p>	1.0	4/01319/14/FUL (8/17)	461	-461	<p>Southern part of site (Wood House). Site purchased by DBC for affordable housing. Ground floor will be for commercial use (c. 800 m²), probably offices. Existing warehouse (assume floorspace = 2,900 m²) demolished in 2014-2015. Current planning application 4/03252/15/MFA proposes housing and commercial/office space. However, the application form indicates that the commercial/office floorspace will be A2 use and that no B-class floorspace is proposed.</p> <p>Northern part of site (Knoll House). Purchased by DCC Foods. Change of use from B1 to mixed class B1 (light industrial, research and development and ancillary offices) to B8 permitted August 2014 (4/01319/14/FUL). Involves a net gain of 461 m² offices and a net loss of 461 m² industrial/warehousing space.</p>
<p>Heart of Maylands, Sites 4 and 6 (SW area)</p> <p>See Heart of</p>	1.1		-75 600 (Site 4)	-930 (Site 4)	<p>The site is in multiple ownerships (including DBC), mostly freehold, but some leased out. Site 4 is used for mixed A and B- class uses, motor trade uses and a public car park. Site 6 is in B-class uses.</p>

Maylands Development Brief					<p>DBC will take the lead in trying to secure the redevelopment of site 4.</p> <p>The Site 4 redevelopment scheme is likely to involve ground floor offices (assume 600 m²) and housing above.</p> <p>The Heart of Maylands Development Brief does not contain any proposals for Site 6 and it is uncertain whether redevelopment will be proposed.</p>
Heart of Maylands, Site 5 (Wood Lane End) See Heart of Maylands Development Brief	0.15				<p>Currently in A2 use (banks).</p> <p>The Heart of Maylands Development Brief does not contain any proposals for this site and relocation of the banks appears unlikely to be viable.</p>
Breakspear House, Maylands Avenue (Kier Park) Maylands Gateway, Site 1: see Maylands Gateway Development Brief (Revised May 2013): http://www.dacorum.gov.uk/docs/default-source/default-	1.55	4/02124/08		4,000	<p>Previous development demolished.</p> <p>Phase 1: hotel (Travelodge) and A3/A5 uses completed on part of site; offices (6,455 m²: site area 0.4 ha.) permitted on the remainder. This permission cannot lapse, but is unlikely to be implemented.</p> <p>Phase 2 (0.5 ha.): a planning application (4/01031/15/MFA) for a Lidl supermarket and offices (351 m²) has been refused.</p> <p>Future uses on all the undeveloped land (0.9 ha.) – probably offices (assume 10,000 m²) or industrial / warehousing (assume 4,000 m²).</p>

document-library/maylands-development-brief.pdf?sfvrsn=0					
<p>Aviva Site, Maylands Avenue</p> <p>Maylands Gateway, Site 2: see Maylands Gateway Development Brief</p>	6.5	4/01132/15	3,004		<p>Planning permission was granted several years ago for the Peoplebuilding scheme, which involves 6 office buildings (60,960 m²):</p> <ul style="list-style-type: none"> • 4/00851/01: two office buildings (20,320 m²) • 4/01474/01: one office building (10,160 m²) • 4/02728/03: three office buildings – outline permission (30,480 m²) • 4/00806/09: three office buildings – reserved matters (30,480 m²) <p>The former Lucas buildings have been demolished. One office building (10,160 m²) has been completed under 4/00851/01. The other permitted office buildings (50,800m²) have not been built, but Aviva (landowners) say that foundations have been dug so the permissions cannot lapse. However, these offices are unlikely to be built.</p> <p>The Council has resolved to grant permission to Aviva's application (4/01132/15/MOA) for retail development (12,503 m²), offices (3,004 m²) and restaurants (650 m²).</p>
Former Lucas and Kodak sports grounds / caravan park (HCA site)	13.1			50,000	Owned by the Homes and Communities Agency (HCA). The site has recently been marketed as suitable for a range of uses including offices, industrial, logistics and hotel (subject to planning). B8 use might mean around 50,000 m ²

Maylands Gateway Site 3: see Maylands Gateway Development Brief					floorspace, whilst with an office scheme the floorspace could be around 100,000m ² . The marketing exercise generated considerable interest for B8 use.
Breakspear Way/ Green Lane/ Boundary Way (DBC site) Maylands Gateway Site 4: see Maylands Gateway Development Brief	9.7		20,000	10,000	This site comprises two parcels of land: 1. Breakspear Way / Buncefield Lane / Green Lane /Boundary Way (4.8 ha.): this prominent site is suitable for landmark HQ offices, but the Council is in discussion with a manufacturing firm regarding land at the Green Lane/Boundary Way junction. The site may be marketed in summer 2016. The split between office and industrial/warehousing floorspace is uncertain, but assume 20,000 m ² offices and 10,000 m ² industrial/warehousing. 2. Caravan storage site, Boundary Way (4.9 ha.): The existing use provides the Council with an income. Most of the site is within the Buncefield Inner Zone, which means that workplaces should provide for less than 100 occupants in each building. It seems likely that about half the site will be retained for caravan storage, with the rest used for green energy production. Therefore, it is assumed that no B-class floorspace will be provided. However, the land not retained for caravan storage might be developed for B8 buildings or open storage.
Maylands Business Park: totals			30,787	114,119	

2. Rest of Hemel Hempstead					
Former Express Dairy, Riversend Road	0.32	4/02831/07		9,703	Demolition of disused dairy depot and construction of six storey self-storage building approved under 4/02831/07/MFA. Recently completed.
1-5 Waterhouse Street		4/01916/14/OPA – 4/01920/14/OPA	-1,712		Prior approval granted for change of use offices to residential (30 flats). Partly implemented.
Swan Court, Waterhouse Street		4/00697/15	-3,111		Prior approval granted for change of use offices to residential (65 flats), with loss of 3,111 m ² offices. Subsequently, planning permission has been granted for a revised scheme, including flats on the roof, which is currently being implemented.
Corner Hall		4/01306/13/OPA 4/01705/14/OPA 4/03050/14/OPA	-5,160		Prior approval granted (4/01306/13) for change of use all four office buildings to residential (70 flats). Prior approval also granted subsequently for residential use of two of the individual office blocks, Brindley House (4/01705/14) and Brunel Court (4/03050/14). Floorspace to be lost = 1,720 m ² at Brindley House, 1,324 m ² at Brunel Court and 682 m ² and 1,434 m ² at the other two buildings. Partly implemented.
Frogmore Road	3.0			-12,000	Forms the majority of the Frogmore General Employment Area (GEA). SW Hertfordshire Employment Land Update (Roger Tym & Partners, 2010) recommended the use of this employment site for other uses.

					Proposed as a housing allocation in the Site Allocations DPD. Estimated loss of industrial/warehousing floorspace is 12,000 m ² (site area = 3 hectares; assuming plot ratio = 40%).
Paradise General Employment Area			5,000	-5,000	Designated as a GEA in the Local Plan. Proposed as a mixed use proposal in the Site Allocations DPD, with B1 led business use and housing. It is uncertain how much (if any) loss of employment floorspace will occur. Likely to be some loss of industrial/warehousing floorspace, but may be some higher density new office development. Assume loss of 5,000 m ² industrial/warehousing and gain of 5,000 m ² offices.
Ebberns Road				-6,000	Proposed for housing in Local Plan (Policy 33) and the Ebberns Road Development Brief for housing development. Partly implemented. The land still in industrial use is recommended as a housing allocation in the Site Allocations DPD. Planning permission has been granted for housing on part of this land: <ul style="list-style-type: none"> • Drew House and The Factory (northern part of site): 4/00931/13/MFA involves the loss of 2,900 m² B2 floorspace. A planning application for housing has been submitted in respect of a further area: <ul style="list-style-type: none"> • Heath House (southern part): 4/02431/15/MFA involves

					<p>the loss of 1,287 m² industrial/warehousing floorspace.</p> <p>Assume that the two buildings in the middle of the site not covered by the above applications have an industrial/warehousing floorspace of 1,800 m². This gives a total loss of around 6,000 m² on the whole area.</p>
Civic Centre		4/03355/ 14	-3,000		Demolition of Civic Centre and replacement by Public Service Quarter. Assume net loss of 3,000 m ² offices.
Marlowes Business Centre, Marlowes			-4,000		Currently in office use. Owned by DBC. Conversion to healthcare uses likely. Assume loss of 4,000 m ² offices.
Hempstead House, Selden Hill		4/01218/ 14/OPA	-2,437		Prior approval granted for change of use offices to residential (39 flats). The development involves a loss of 2,437 m ² offices.
Symbio House, Whiteleaf Road	0.18	4/01044/ 14/OPA 4/02320/ 14	-1,465		<p>Prior approval granted for change of use offices (1,465 m²) to residential (17 flats).</p> <p>Subsequently, planning permission (4/02320/14/OUT) has been granted to redevelop the site for a mixed use scheme including 208 flats and 859 m² offices (resulting in a net loss of 606 m² offices). A fresh application (4/03441/15/MFA) to redevelop the site proposes 272 flats and ancillary uses, but no office floorspace.</p>
11 Bridge Street		4/03124/ 15/OPA	-1,100		Prior approval granted for change of use from offices to residential (16 flats).
Bryanston Court, Selden Hill		4/03283/ 15/OPA	-3,837		Prior approval granted for change of use from offices to residential (60 flats).

Spencer's Park phase 2, Three Cherry Trees Lane	1.9			8,000	This site forms the southern part of Local Plan employment proposal site E4, which was considered in Appendix 1 above. Site E4 is now proposed mainly for housing (Spencer's Park phase 2) in Figure 18 in the Core Strategy. A master plan for Spencer's Park phase 2 is currently being prepared. Up to around 1.9 hectares of employment land (c. 8,000 m ² industrial/warehousing built floorspace) is likely to be proposed in the south part of this land, where proximity to the Buncefield oil terminal rules out housing.
Rest of Hemel Hempstead: totals			-20,822	-5,297	
Hemel Hempstead: totals			9,965	108,822	
Berkhamsted					
Former Durrants Furniture, Billet Lane	0.37	4/01244/13		2,200	Permission granted for part demolition, reducing building from 3,320 m ² to 2,220 m ² (loss of 1,100 m ²) and sub-division, with creation of smaller B1/B2/B8 units. Construction has started, so existing floorspace has been 'lost'.
263-265 High Street		4/03712/14/OPA (05/16)	-1,000		Prior approval granted for change of use from offices to residential (19 flats).
Berkhamsted: totals			-1,000	2,200	

Tring					
Western Road				-2,500	Proposed for housing in Local Plan (Policy 33) and the Western Road Concept Statement (2006). Site area = 0.6 ha. A small part has been implemented. Assume 2,500 m ² industrial/warehousing floorspace still to be lost.
Icknield Way	0.6			3,000	The Core Strategy (chapter 22) proposes the extension of the Icknield Way GEA into the Local Allocation LA5 site (west of Tring). An extension of 0.75 hectares is proposed in the Site Allocations DPD.
Akeman Street	0.8			-1,000	Designated as a GEA in the Local Plan. SW Hertfordshire Employment Land Update (Roger Tym & Partners, 2010) suggested the use of this employment site for other uses (with a loss of 3,200 m ² industrial/warehousing floorspace). The Langdon Street haulage yard is proposed as a housing allocation in the Site Allocations DPD. It is proposed to retain rest of GEA, but accept a range of non-residential mixed uses including social and community facilities, to reflect the Core Strategy. Assume a total loss of 1,000 m ² industrial/warehousing floorspace.
Tring: totals			-	-500	

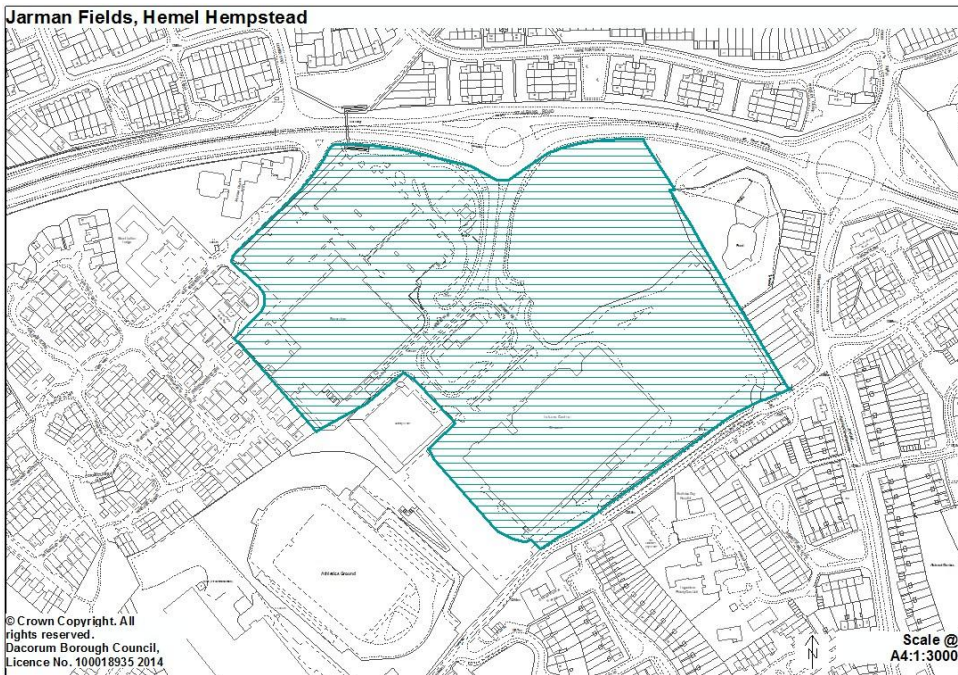
Kings Langley					
Sunderlands Yard					<p>SW Hertfordshire Employment Land Update (Roger Tym & Partners, 2010) suggested the use of this employment site for other uses (with a loss of 5,560 m² industrial/warehousing floorspace).</p> <p>It is not proposed to allocate the site for housing in the Site Allocations DPD, as this is a useful employment site. However, the site will be kept in the residential area, so housing will remain acceptable in principle.</p>
Kings Langley: totals			-	-	
Markyate					
Hicks Road		4/01173/ 11		1,052 -1,100 (north part)	<p>Mixed use redevelopment of most of site (1.9 ha.) for housing and other uses is under construction, reflecting Hicks Road Masterplan (updated June 2012) and the Core Strategy's proposals for Strategic Site SS2. Most of the original employment buildings have been demolished, but Sharose Court has been retained and extended for employment use.</p> <p>This permission (4/01173/11/MFA) excludes part of the land north of Hicks Road. Assume 1,100 m² industrial/warehousing floorspace to be lost on this part of the site.</p>
Markyate: totals			-	-48	

Rest of Dacorum					
Bourne End Mills	4.38	4/02245/ 12/VOT (05/16)		-11,873 +10,000	Designated as an Employment Area in the Green Belt in the Local Plan and it is proposed to carry this designation into the Site Allocations DPD, with amended boundaries. Redevelopment for B1c, B2, B8 units permitted under 4/02524/08/MOA (floorspace: 15,423 m ²) and renewed in 2012 (4/02245/12/VOT). This permission excludes existing Units 28, 30 and 31 fronting Upper Bourne End Lane. Permission 4/02245/12 is unlikely to be implemented. A revised application (4/03072/15/MFA), for B1 and/or B8 (6,407 m ²) and up to 45 homes has been submitted, but the Council is not committed to accepting any housing. Assume 10,000 m ² of employment floorspace.
Egg Packing Station, Lukes Lane, Gubblecote	1.60	4/01352/ 11	460	-4,056	Demolition of existing buildings, construction of housing and 4 business units permitted.
Cotton Spring Farm, Friendless Lane, Markyate	0.52	4/02353/ 14		-1,131	Permission granted for demolition of existing buildings (1,131 m ² B1(c) buildings and an agricultural building (462 m ²)), and replacement with four new dwellings.
Rest of Dacorum: totals			460	-7,060	
Dacorum: totals			9,425	103,414	

APPENDIX 4: Proposed Out of Centre Retail Locations

Figure 14: Jarman Fields, St Albans Road, Hemel Hempstead

New Designation: The proposed “Out of Centre Retail & Leisure Location” applies to the wider Jarman Fields area. It will replace the Local Plan designation for this area as a “Local Centre”.



Existing Local Plan designation for Local Centre:

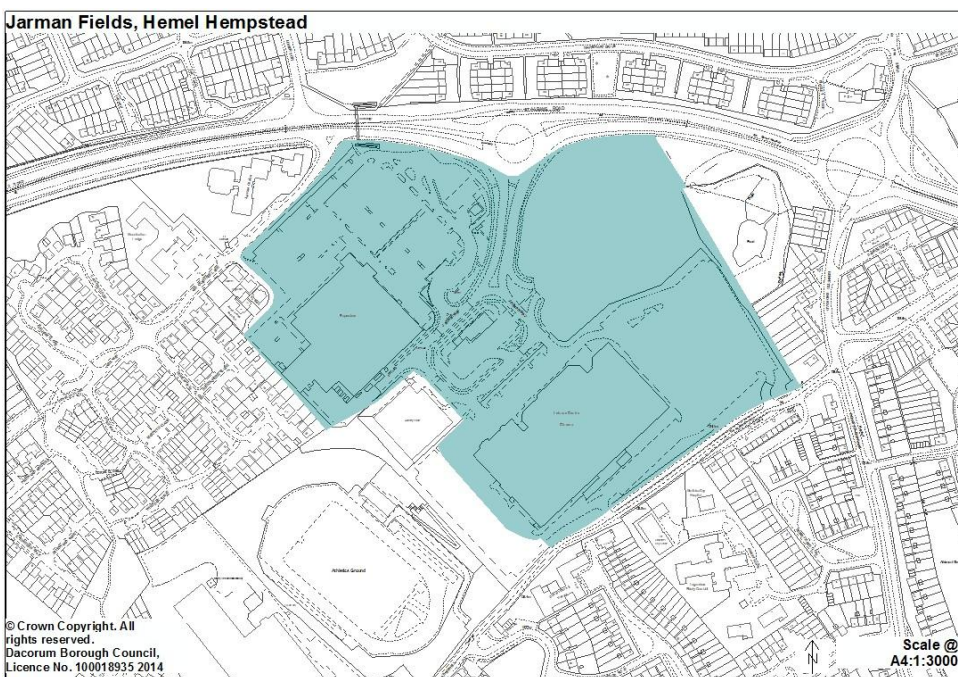


Figure 15: London Road/Two Waters Way, Hemel Hempstead:

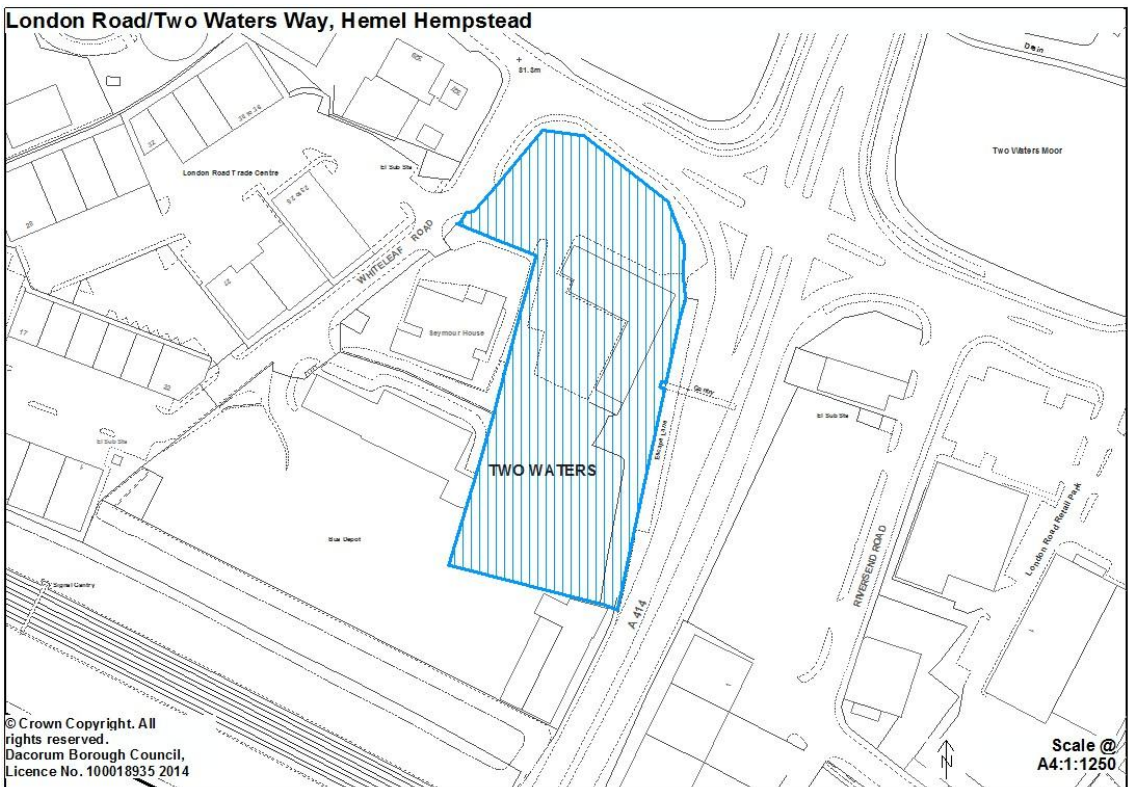
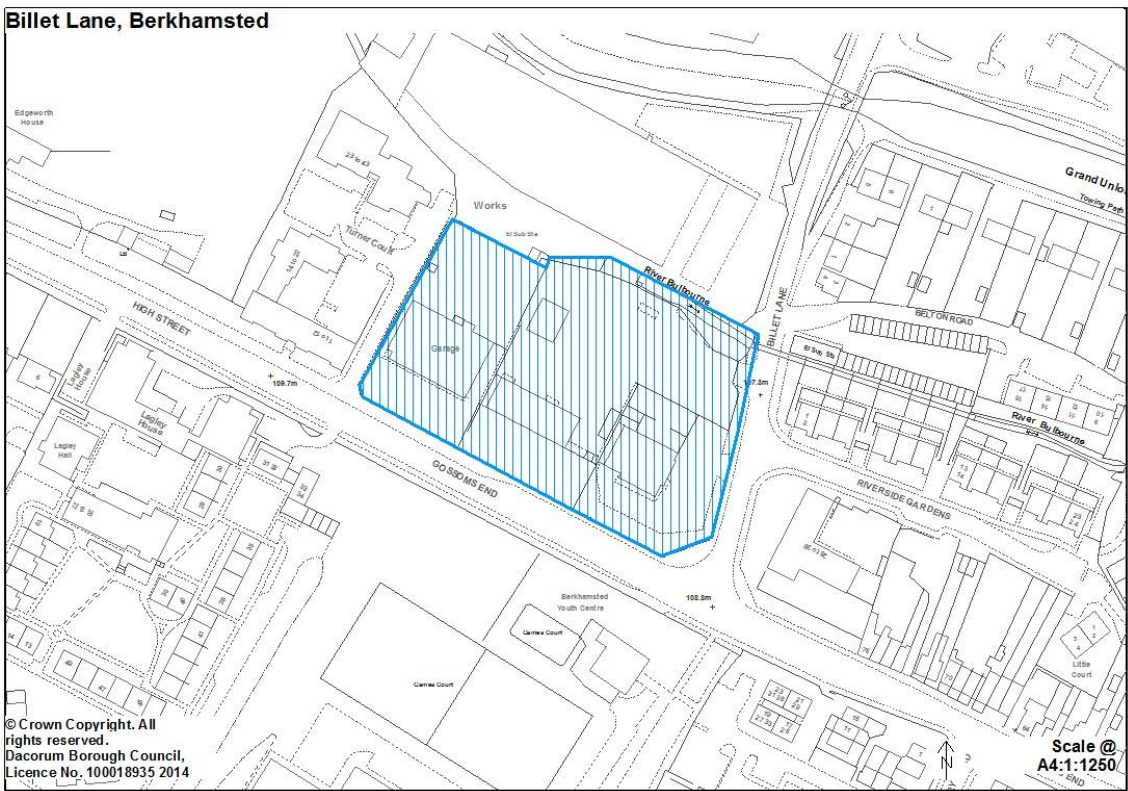


Figure 16 Gossoms End/Billet Lane, Berkhamsted

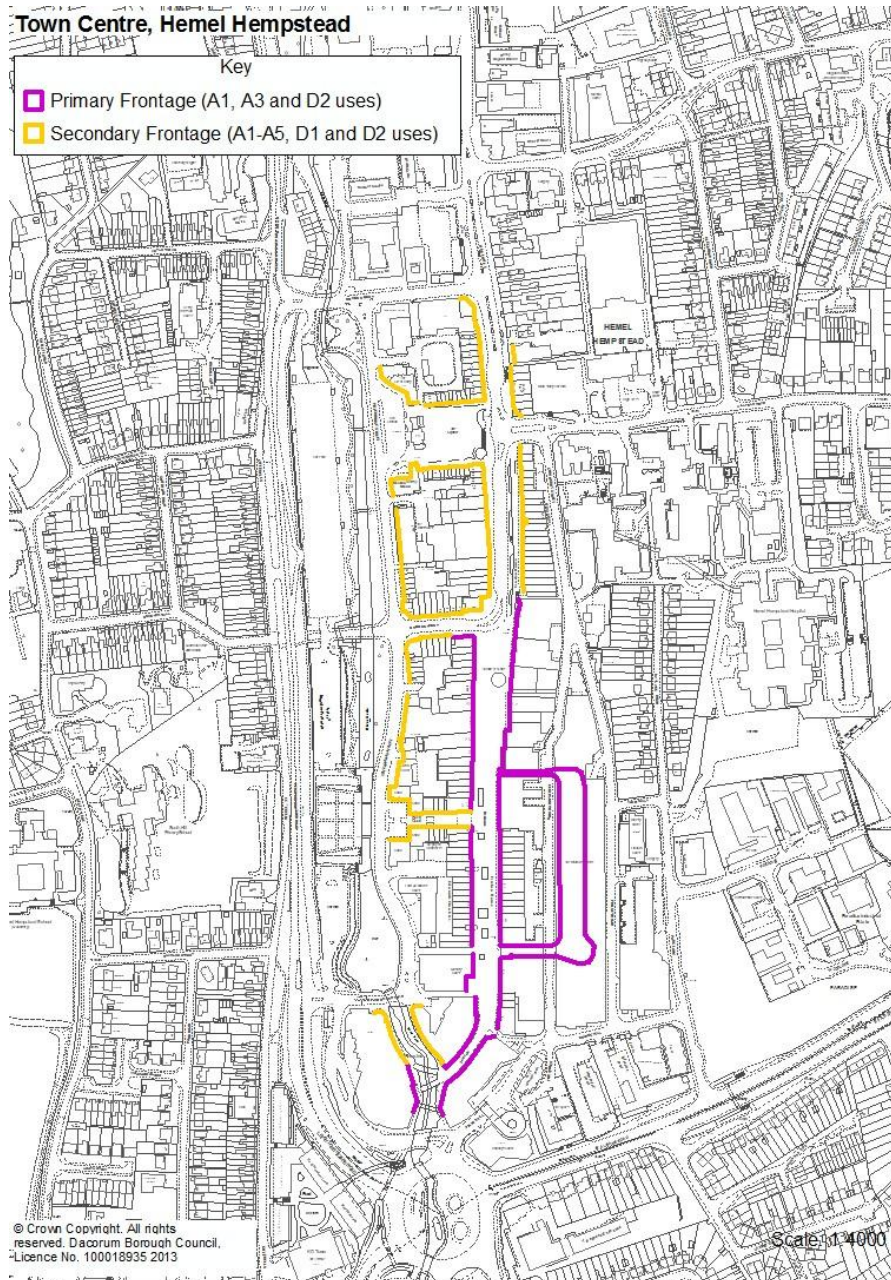


APPENDIX 5: Retail Frontages

Note: “Primary Frontage” will replace previous Local Plan designation “Main Shopping Frontage”. “Secondary Frontage” will replace previous Local Plan designation “Mixed Frontage”.

Figure 17: Hemel Hempstead Town Centre

Proposed Retail Frontage – Hemel Hempstead:



Existing Retail Frontage – Hemel Hempstead:

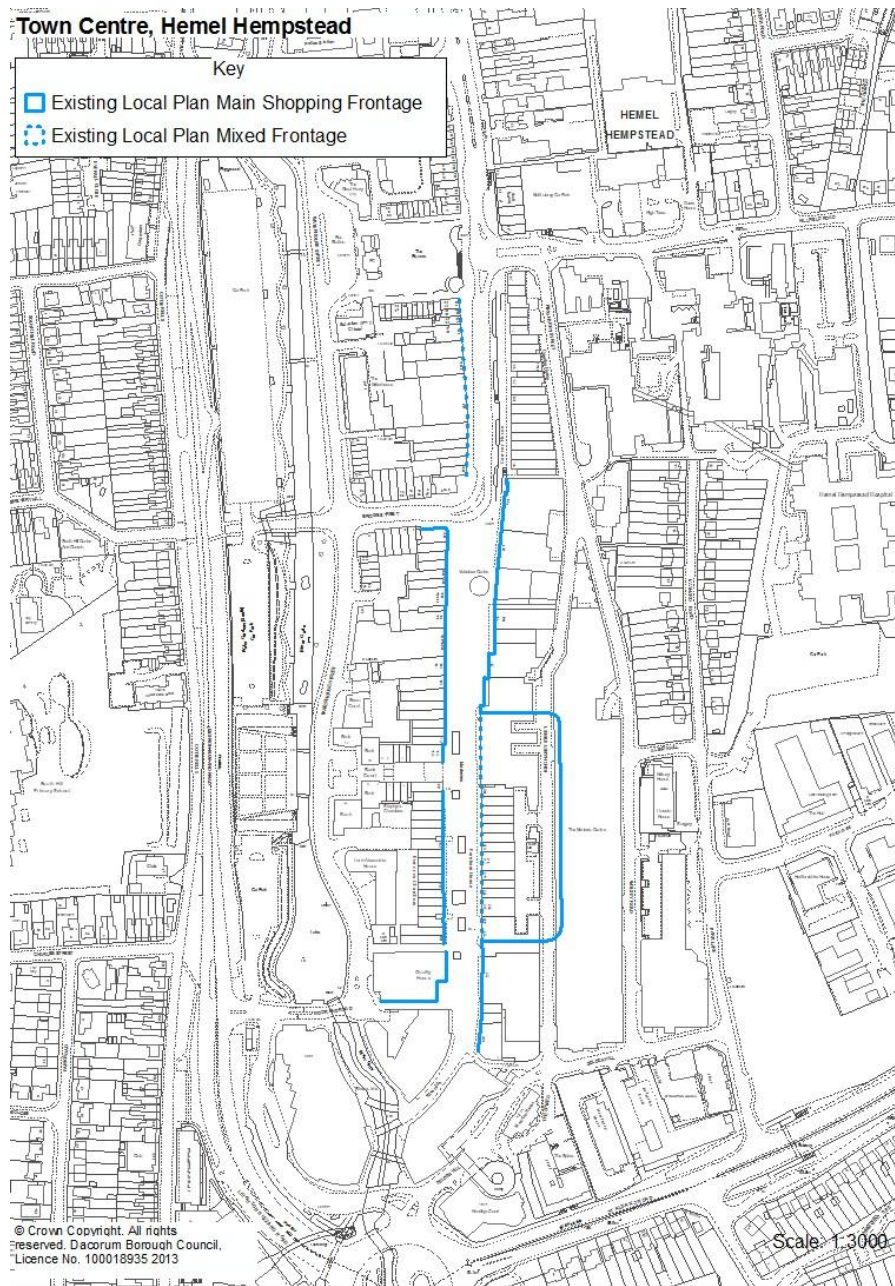
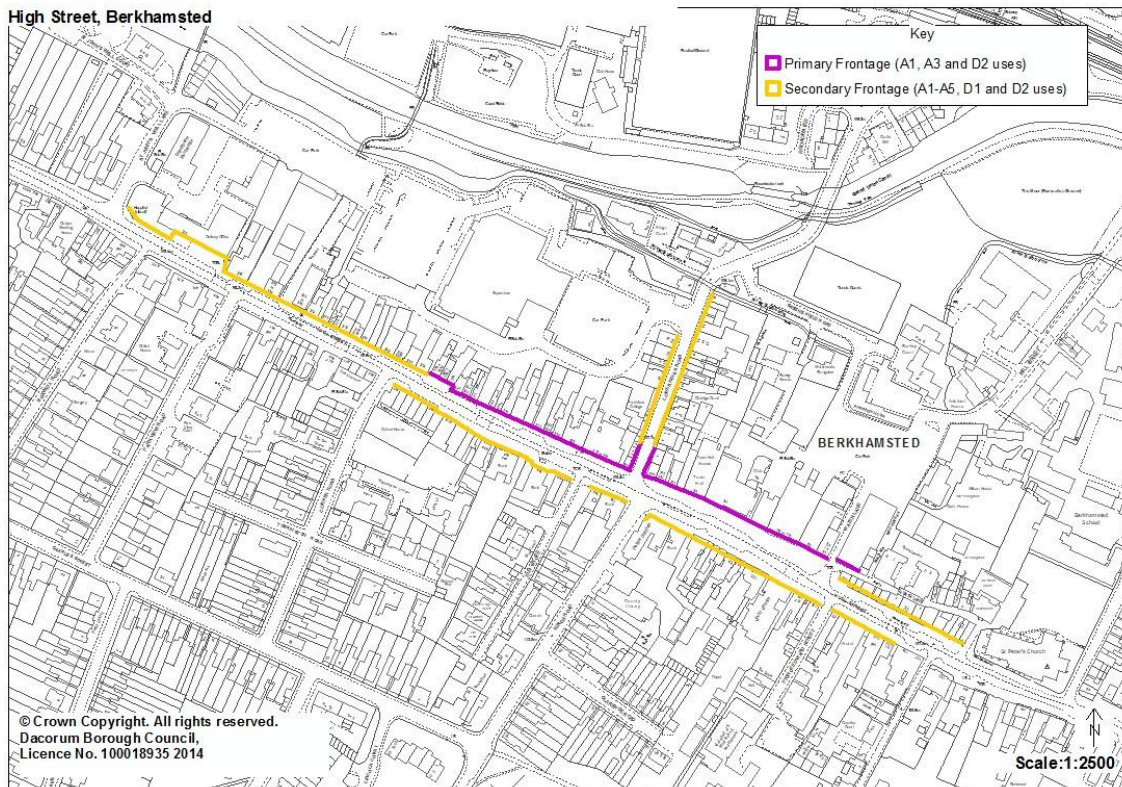


Figure 18: Berkhamsted Town Centre

Proposed Retail Frontage – Berkhamsted:



Existing Retail Frontage – Berkhamsted:

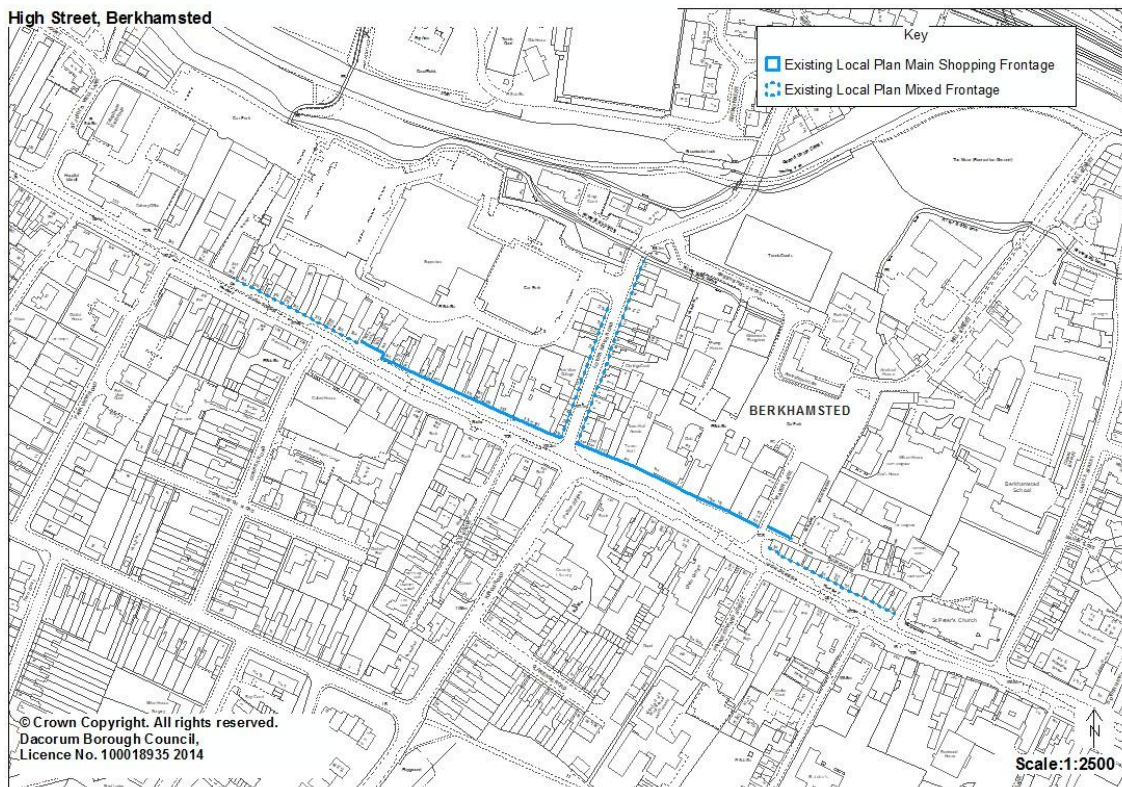
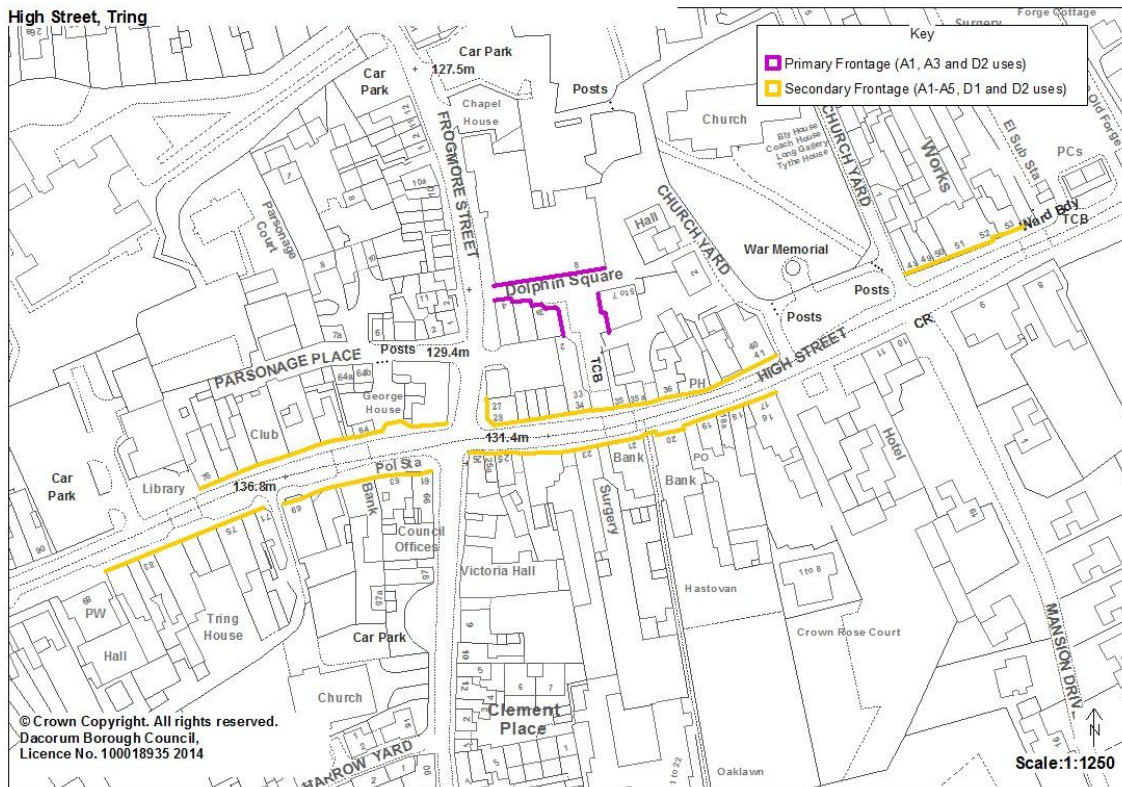
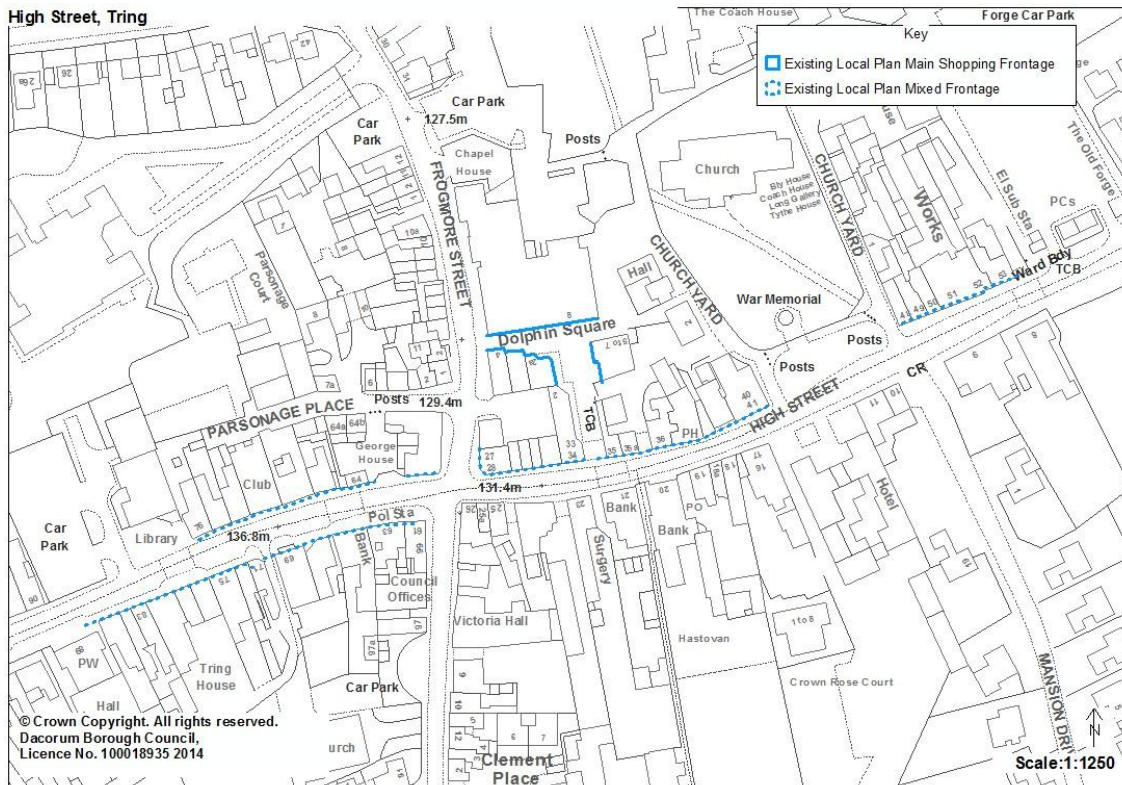


Figure 19: Tring Town Centre

Proposed Retail Frontage – Tring:



Existing Retail Frontage – Tring:



APPENDIX 6: Shopping Proposal Sites

Figure 20: Jarman Fields, St Albans Road, Hemel Hempstead

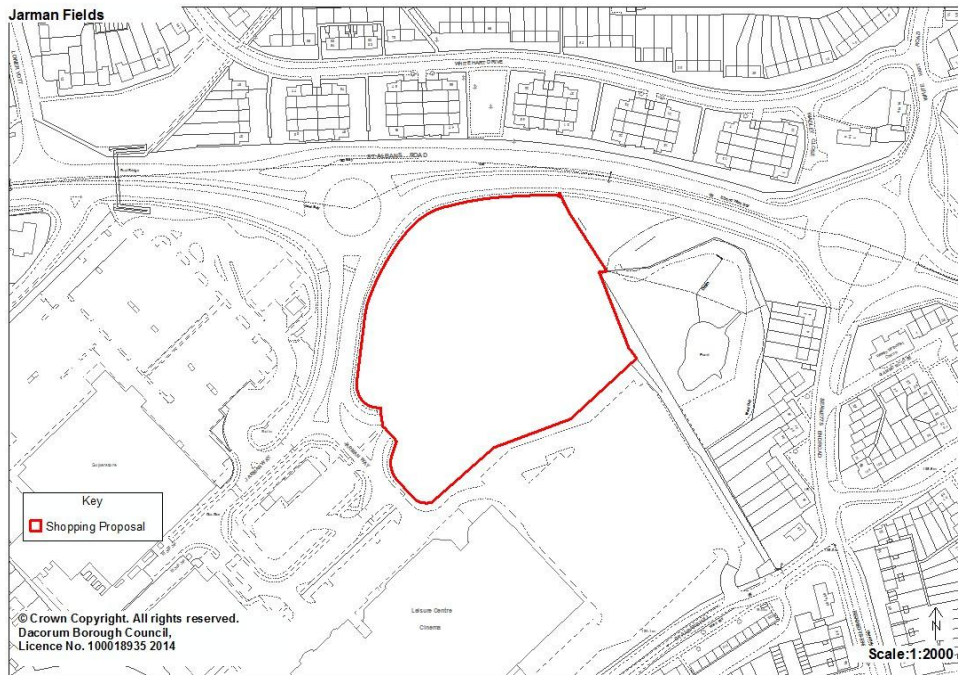


Figure 21: West Herts College and Civic Zone, Hemel Hempstead



Figure 22: Gossoms End/Billet Lane, Berkhamsted

