



Dacorum Borough Council

Local Planning Framework

DACORUM CORE STRATEGY EXAMINATION IN PUBLIC

Statement by Dacorum Borough Council

Issue 5: Strengthening Economic Prosperity

September 2012

Purpose of this statement

The purpose of this statement is to summarise the Council's position regarding the following issues raised by the Inspector in advance of their discussion at the public hearing sessions.

To avoid repetition this statement includes cross references to appropriate technical work and includes relevant extracts as appendices.

Matters raised by Inspector

- 5.1. Does the Core Strategy provide sound guidance for economic growth in the Borough relative to its needs? Is policy CS14 sufficiently detailed, flexible and clear? NPPF (paragraph 21) advises that a clear economic vision and strategy for the area should be set out which positively and proactively encourages sustainable economic growth. Is the strategy for the Borough as a whole sufficiently clear and flexible enough to allow for a rapid response to changes in economic circumstances?
- 5.2 Does the Core Strategy include sufficient support for the promotion of a strong rural economy?
- 5.3 How will the 10,000 jobs (policy CS14) be translated into floorspace when specific sites are allocated in subsequent plans? What is the 'minimum supply of land' and 'long-term', as referred to in policy CS15? How, and in what document, will the minimum supply of land, referred to in policy CS15 be identified? On what evidence is the 131,000 sqm of additional office floorspace based? Policy CS15 refers to a number of general locations (e.g. land in town centres, employment areas in the green belt and core office locations) but it is not clear where these are. Why is the policy not more explicit?
- 5.4 Is there sufficient clarity regarding the infrastructure required to enable economic growth, including the expansion of electronic communications networks?
- 5.5 Are the floorspace figures in policy CS16 based on robust evidence? How will the 'opportunities' be 'given'? How will demand be assessed? There is reference to the creation of a new local centre at Maylands (para 13.3). Why is this not specifically proposed in policy CS16?
- 5.6 Is sufficient support provided for the retention and strengthening of local shopping centres? Is the classification of the various locations of retail provision (Table 5) appropriate and justified? What is the role of Jarman Fields retail centre and is its designation as an out-of-centre location justified?
- 5.7 What is the role of the Borough in terms of tourism? Is sufficient guidance given on the Council's approach to the issue?

Dacorum Borough Council's Response

5.1 Does the Core Strategy provide sound guidance for economic growth in the Borough relative to its needs? Is policy CS14 sufficiently detailed, flexible and clear? NPPF (paragraph 21) advises that a clear economic vision and strategy for the area should be set out which positively and proactively encourages sustainable economic growth. Is the strategy for the Borough as a whole sufficiently clear and flexible enough to allow for a rapid response to changes in economic circumstances?

5.1.1 The Core Strategy, especially Section 11, provides sound guidance for economic growth in Dacorum relative to its needs. This approach is based on the evidence in the Employment/Economic Development documents (Examination Documents ED1-ED14) and the Economic Development Strategies for both Hertfordshire and Dacorum (Examination Documents REG21 and ED16).

5.1.2 Policy CS14: Economic Development is the key policy. It encourages sustainable economic growth, with the main emphasis given to:

- Planning for 10,000 additional jobs between 2006 and 2031, as recommended in paragraph 6.3 of the Employment Land Update 2011 (Examination Document ED12).
- Focussing new economic development on Hemel Hempstead, particularly by regenerating the Maylands Business Park and the town centre.
- Maintaining employment levels elsewhere in the borough to ensure a spread of job opportunities.
- Supporting the knowledge-based economy, the transition to a low carbon economy, the rural economy and sustainable tourism.
- Developing the skills of the local workforce.

5.1.3 The above represents a balanced strategy, which is concerned with the scale of job growth, its distribution and the nature of jobs to be provided.

5.1.4 It should also be noted that Policy CS14 has been considered in the Sustainability Appraisal Report (Examination Document SUB7). For example, paragraph 6.4.1 in the Sustainability Appraisal Report states that policies within the 'Strengthening Economic Prosperity' section will *"support the development of a sustainable economy within the area and should help reduce the need to travel to access employment opportunities. The policies aim to concentrate new development at Hemel Hempstead but should also help to maintain the vitality of local communities by enabling employment opportunities appropriate to the size and character of the settlements to be provided. The protection of employment areas should help ensure that communities do not suffer from the loss of important employment opportunities....."*

5.1.5 Policy CS14 is considered to be sufficiently detailed, flexible and clear. The level of detail is appropriate for a Core Strategy. More detailed policy guidance will be included in the Site Allocations, East Hemel Hempstead Area Action Plan and Development Management Development Plan Documents (as indicated by the delivery section following Policy CS14).

5.1.6 Policy CS14 is also sufficiently clear and flexible enough to allow for a rapid response to changes in economic circumstances. The main flexibility relates to the scale, timing and type of new jobs to be provided in Hemel Hempstead town centre and the Maylands Business Park, as explained in paragraphs 5.1.7-5.1.9 below.

5.1.7 The Council has recently published the Draft Hemel Hempstead Town Centre Masterplan (Examination Document MP4). Regeneration objective 4 in paragraph 3.4.1 of the Draft Masterplan states that the Council aims to assist the town centre in reaching its economic potential. The Draft Masterplan identifies several sites as having 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 in MP4). The proposals for this zone include a new college, food store and Public Service Quarter.
- The Hospital Zone (section 5.4.1 in MP4), where the proposals include a reconfigured hospital, a new primary school and a wider range of offices in the Paradise Employment Area.

5.1.8 As indicated in Pre-Submission Core Strategy paragraph 12.7 and on Figure 22, the majority of employment jobs growth will be directed to the Maylands Business Park. The Maylands Gateway will provide a prominent new office-led strategic employment location and the Face of Maylands will also be an important office location. Paragraph 12.12 of the Pre-Submission Core Strategy refers to the significance of Maylands as a location for industrial and storage and distribution uses. Considerable scope exists for further such development.

5.1.9 Detailed guidance on Maylands already exists in the Maylands Masterplan (Examination Document ED4) and the Maylands Gateway Development Brief (ED5). A revised version of the Gateway Development Brief is currently being prepared. This is expected to give increased flexibility over the type of jobs to be provided to reflect current economic circumstances, whilst retaining the proposals for employment growth to meet longer term needs.

5.1.10 It is considered that the Council's approach towards economic development in the Pre-Submission Core Strategy is in accordance with the following aspects of the National Planning Policy Framework (NPPF):

- Core planning principle 3 in paragraph 1; and
- The section on building a strong, competitive economy (paragraphs 18-22, with particular focus on the bullet points in paragraph 21).

However, the detailed policies needed to comply fully with the NPPF are not contained in the Core Strategy, but will appear in the Site Allocations, Development Management and East Hemel Hempstead Area Action Plan Development Plan Documents.

- 5.1.11 As the NPPF resulted in PPS4 (Planning for Sustainable Economic Growth) being cancelled, it is proposed to make a further minor change to the Core Strategy. This change involves amending paragraph 11.1 to refer to the NPPF's advice on economic development, rather than PPS4.
- 5.1.12 Paragraphs 3.41-3.62 of the South West Hertfordshire Employment Space Study (Examination Document ED1) contains information from the 2001 Census on travel to work. In 2001, Dacorum had a high self-containment rate (61% of the borough's working residents were employed in the borough) and almost nil net commuting. A high self-containment rate is commonly used as a measure of the sustainability of journeys to work.
- 5.1.13 Further information on commuting is given in paragraphs 4.11-4.14 of the Employment Land Update 2011 (ED12). There was an estimated negative average commuting balance of 5,100 jobs between 1994 and 2010. The net outflow is estimated to increase marginally to 6,700 workers by 2031. This estimate is based on the proposal in the Employment Land Update and Policy CS14 for 10,000 additional jobs in the Borough by 2031.
- 5.1.14 In order to clarify the Core Strategy's guidance on economic growth, a further minor change is proposed that adds new text after paragraph 11.3. This text reflects paragraphs 5.1.12 and 5.1.13 above and states that the Council aims to keep net out-commuting low and maintain a high self-containment rate.
- 5.1.15 It is important to note that the Core Strategy is only part of the Council's wider work in promoting economic development. This can be seen from the following documents:
- *Destination Dacorum* (Examination Document BP7). This is Dacorum's new Sustainable Community Strategy, which has recently been launched by the Council and its partners. It is due to be adopted by the Council at the Full Council meeting on 26 September. Given the current economic situation, Destination Dacorum's key focus is economic well-being and one of the three priorities is business growth, housing and regeneration. There are also six ambitions, linked to the key focus. One of these ambitions is '*to make Dacorum more prosperous*'. The intention is to meet this ambition by increasing the profile of business and retain existing business, particularly in Maylands.
 - *Dacorum Economic Development Strategy 2009-2012* (Examination Document ED16), which is referred to in paragraph 11.6 of the Core Strategy and the delivery section following Policy CS14. An updated Economic Development Strategy for 2012-2015 (incorporating an Open For Business statement) is due to be submitted to the Council's Cabinet

for approval on 23 October 2012.

- *Dacorum Development Programme 2011-2015* (Examination Document OT5). This document illustrates all the Council's current projects in support of economic development and regeneration.

5.2. Does the Core Strategy include sufficient support for the promotion of a strong rural economy?

5.2.1 It should be appreciated that no part of Dacorum is very far from a town and that most of the Borough's rural area is in the Green Belt and/or the Chilterns Area of Outstanding Natural Beauty (AONB). Therefore, it would not be a sound approach for the Core Strategy to plan for a major expansion of economic activity in the rural area. Nevertheless, the Council regards it as important to give appropriate support for the rural economy.

5.2.2 Indeed, the Pre-Submission Core Strategy contains a number of expressions of support for the rural economy, as shown below:

- Strategic objective 9 includes a sub-objective 'to support rural enterprise'.
- Paragraph 11.8 emphasises that the Borough's economy has a significant rural sector that will be supported. This paragraph also defines what is meant by the term '*rural economy*'.
- Policy CS14: Economic Development states that development that supports the rural economy will be particularly encouraged.
- Policy CS15: Office, Research, Industry, Storage and Distribution includes employment areas in the Green Belt as part of the '*minimum supply of land*' for B class uses.
- The Countryside Place Strategy (section 26) includes a local objective to support the rural economy, and particularly farming, local food production and sustainable tourism. Other guidance in section 26 of particular relevance is contained in paragraphs 26.6 (which stresses the need to retain village services and facilities), 26.8 (Green Belt employment areas and farm diversification), 26.9 and 26.10 (farming, forestry and land management) and 26.11 and 26.12 (tourism).

5.2.3 Policies CS5: Green Belt, CS6: selected Small Villages in the Green Belt and CS7: Rural Areas of the Pre-Submission Core Strategy are also relevant. The Council has proposed amendments to Policies CS5 and CS7 to take account of the NPPF (see minor changes MC14 and MC16 in the Report of Representations – Examination Document SUB5). Policies CS5-CS7 as amended give considerable flexibility for the replacement or change of use of existing buildings, the replacement of buildings, the redevelopment of previously developed sites and limited extensions to existing buildings. This flexibility can provide important opportunities for the rural economy to grow.

5.2.4 Policy CS23: Social Infrastructure does not refer specifically to the rural economy. Nevertheless, one of the purposes of this policy is to promote the retention and development of local services in villages, in line with bullet point 4 in paragraph 28 of the NPPF.

5.2.5 Policy 32: Employment Areas in the Green Belt in the Dacorum Borough Local Plan (Examination Document OT1) has some policies relating refers to the rural economy, which will continue to be 'saved' following the adoption of the Core Strategy. The following policies are particularly relevant:

- Policy 32: Employment areas in the Green Belt
- Policy 109: Farm Diversification
- Policy 110: Agriculture and Reuse of Rural Buildings

Paragraph 5.6.3 of question 5.6 below refers to policies on tourism, most of which are also relevant.

5.2.6 The large villages of Bovingdon, Kings Langley and Markyate, which are excluded from the Green Belt, contain important sources of employment which the Council wishes to retain. This can be seen from the Place Strategies for these villages (sections 23-25 in the Pre-Submission Core Strategy). Although the large villages do not fall within the definition of rural economy, they have a role in providing employment opportunities for 'rural' residents.

5.2.7 As stated in paragraph 5.2.2 above, the Countryside Place Strategy identifies sustainable tourism as forming part of the rural economy. Several of the Borough's tourist attractions are in the rural area. The response to question 5.6 below gives further information on the Pre-Submission Core Strategy's approach towards tourism, including the Council's imminent appointment of a Tourism and Marketing Officer.

5.2.8 In the light of the above, it is concluded that the Pre-Submission Core Strategy includes sufficient support for the promotion of a strong rural economy. It is also considered that the policies supporting the rural economy are consistent with the NPPF (paragraph 28), bearing in mind the Green Belt and AONB constraints that apply in most of the rural area. More detailed guidance on the rural economy will be provided in the Site Allocations and Development Management DPDs. This further guidance will replace the saved policies in the Dacorum Borough Local Plan.

5.3. How will the 10,000 jobs (Policy CS14) be translated into floorspace when specific sites are allocated in subsequent plans? What is the 'minimum supply of land' and 'long-term', as referred to in Policy CS15? How, and in what document, will the minimum supply of land, referred to in policy CS15 be identified? On what evidence is the 131,000 sqm of additional office floorspace based? Policy CS15 refers to a number of general locations (e.g. land in town centres, employment areas in the green belt and core office locations) but it is not clear where these are. Why is the policy not more explicit?

5.3.1 The proposal for approximately 10,000 additional jobs between 2006 and 2031 accords with the recommendation in paragraph 6.3 in the Employment Land

Update 2011 (Examination Document ED12). The 10,000 jobs figure is based on the estimates of employment change in the Borough, as set out in paragraph 5.2 of the Employment Land Update 2011:

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

5.3.2 Around 60% of the estimated employment growth is in non-B class uses, such as hotels and catering, construction, education, healthcare, retailing and leisure. Appropriate allocations for non-B uses will therefore be included in the Site Allocations and East Hemel Hempstead Area Action Plan Development Plan Documents (DPDs). The scale and location of these allocations will reflect the evidence base, for example the Retail Study Update (Examination Document ED 13).

5.3.3 A further minor change is proposed to the Pre-Submission Core Strategy, in the form of a new paragraph after paragraph 11.2. The new paragraph reflects paragraph 5.3.2 above and states that the Council will monitor the effectiveness of other policies within the Core Strategy in supporting the growth of such jobs.

5.3.4 The Employment Land Update 2011 (ELU) gives advice on the amount of B class floorspace that should be planned for in the Core Strategy. Paragraph 5.5 in the ELU translates the employment change forecasts (see paragraph 5.3.1 above) into the following forecasts of demand for B class floorspace 2006-2031:

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

5.3.5 Paragraphs 5.7-5.17 in the ELU provide advice on floorspace targets for the B class uses. This advice is summarised in paragraphs 5.3.6-5.3.10 below.

5.3.6 The ELU looks at the planned supply of land i.e. completions 2006-2011, outstanding permissions, allocations and proposals made in the South West Hertfordshire Employment Land Update (Examination Document ED8). The planned supply amounts to a net floorspace gain of 34,000 sq. metres for industry/warehousing and 145,000 sq. metres for offices.

5.3.7 By far the largest site proposed for B class development is the Maylands Gateway site in Hemel Hempstead. The floorspace estimates in the ELU are based on an option for the site that assumes 122,000 sq. metres of offices and 18,500 sq. metres of industrial/warehousing space.

5.3.8 Next, the ELU compares the planned supply (paragraph 5.3.5 above) with the demand forecast (paragraph 5.3.4). This comparison shows a large oversupply in the planned supply of industrial/warehousing space and a small oversupply of offices.

5.3.9 However, paragraphs 5.9-5.13 in the ELU explain why the calculations for industry and warehousing are considered to be pessimistic and subject to a large margin of error. The consultants conclude that the market is 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 Policy CS15 (Offices, Research, Industry, Storage and Distribution).

5.3.10 Finally, paragraphs 5.14-5.17 in the ELU consider offices. The consultants suggest 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, paragraph 5.16 in the ELU advises 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."

5.3.11 Policy CS15 includes a long term target of 131,000 sq. metres net additional office floorspace, as recommended in ED 12. However, the policy expresses the target as being *at least* 131,000 sq. m. It is felt that the Core Strategy should be amended to better reflect the advice in the ELU. Therefore, two further minor changes are proposed to the Core Strategy. Firstly, it is proposed that 'at least' in Policy CS15 be deleted and replaced by '*in the region of*'. Secondly, a new paragraph is proposed after paragraph 12.5 to summarise the advice in paragraphs 5.15 and 5.16 of the ELU.

5.3.12 The Council will allocate land for B class uses in the Site Allocations DPD and the East Hemel Hempstead Area Action Plan. In reaching decisions on how much land to allocate and which sites to select, the Council will take account of a range of factors, including:

- The allocations for B class uses in the Dacorum Borough Local Plan (Examination Document OT1) – see Policies 31 and 32, and the Schedule of Employment Proposal Sites, all of which will continue to be saved after the Core Strategy is adopted.
- The advice in the South West Hertfordshire Employment Land Update and the ELU (Examination Documents ED8 and 12).
- Relevant Council documents, such as the Maylands Masterplan (Examination Document ED4), the Maylands Gateway Development

Brief (ED5), the revised version of the Brief (which is currently being produced) and the Hemel Hempstead Town Centre Masterplan (the draft version is MP4).

- Monitoring evidence.

5.3.13 The importance of monitoring should be emphasised, as the Council will be continually monitoring what is happening on the ground. This will be done through the employment land position statements (see Examination Document ED14 for the 2012 edition) and the Annual Monitoring Report (see Examination Document BP2), which will analyse key data and trends. The Annual Monitoring Report 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.

5.3.14 With regard to the Inspector's question about the 'minimum supply of employment land', the Core Strategy is carrying forward the approach established in Policy 29 of the Dacorum Borough Local Plan 1991-2011 (OT1). This approach has been effective in the past, is supported by the Council's employment advisers (Roger Tym and Partners) and is considered to remain sound and logical. Sentence 1 in Policy 29 and paragraph 29.9 in the Local Plan explain the concept of the minimum supply of land. It means that sufficient land should be provided for the B class uses throughout the plan period to enable full employment to be achieved, whilst assuming prevailing levels of out-commuting will continue. The minimum supply of employment land covers land already used for B class purposes and proposed new sites for such uses. This can be seen from points (a) – (d) at the start of Local Plan Policy 29 and the bullet points in Policy CS15.

5.3.15 It is considered that the following further minor changes to the Core Strategy would improve clarity. A new paragraph is proposed after paragraph 12.13 and changes are proposed to Policy CS15. The new paragraph reflects paragraph 5.3.14 above. It refers to the *minimum area* (rather than the minimum supply) of employment land, as it includes existing land used for the B classes as well as proposed new sites. The proposed further minor changes to Policy CS15 are set out below:

- Amend the start of paragraph 1 to state: "*A minimum area of land...*".
- In line 1 of paragraph 2, delete '*long term*' and replace by '*2006-2031*'.

5.3.16 Turning now to the last question raised by the Inspector under Issue 5.3, the bullet points in Policy CS15 refer to a number of general locations for B class uses (e.g. land in town centres, employment areas in the Green Belt and core office locations). However, the policy does not state where these locations are, because the Core Strategy is not a detailed site specific plan.

5.3.17 More detailed guidance is currently given in the Dacorum Borough Local Plan 1991-2011. The general locations that constitute the minimum supply of employment land are referred to in points (a) – (d) at the start of Policy 29.

Points (a) – (d) cross-refer to saved Policies 31, 32, 38 and 39 and the Schedule of Employment Proposal Sites, where detailed site specific information can be found. All the locations are indicated on the Proposals Map (either as specific locations such as the General Employment Areas, or areas where there is a concentration of employment uses i.e. town and local centres).

5.3.18 The locations for B class use will be re-evaluated through the Site Allocations DPD and the East Hemel Hempstead Area Action Plan (see the delivery section following Policy CS15). This process will take account of the site-specific advice of Roger Tym and Partners regarding potential reallocations from employment to other uses see section 4 of the South West Hertfordshire Employment Land Update (Examination Document ED8).

5.3.19 The Council accepts that it cannot offer policy protection to every little bit of employment floorspace that exists in the Borough (and neither would it wish to do so). The approach is to protect key concentrations and locations. It is also acknowledged that General Employment Areas do not solely contain B class uses.

5.4 Is there sufficient clarity regarding the infrastructure required to enable economic growth, including the expansion of electronic communications networks? Are the floorspace figures in policy CS16 based on robust evidence? How will the ‘opportunities’ be ‘given’? How will demand be assessed? There is reference to the creation of a new local centre at Maylands (para 13.3). Why is this not specifically proposed in policy CS16?

5.4.1 Infrastructure requirements have been assessed through technical work (especially the Infrastructure Delivery Plan Update – Examination Document ID5) and consultation. As a result, relevant thresholds for new infrastructure and the capacity of existing infrastructure, including the road network and utilities infrastructure have been established. Consideration has also been given as to whether there should be any ‘jumps’ in thresholds e.g. what infrastructure is needed to accommodate different scales of development.

5.4.2 There are significant issues relating to transport infrastructure in the two locations where economic growth is being concentrated, namely, the Maylands Business Park and Hemel Hempstead town centre. These issues have been addressed in the Hemel Hempstead Urban Transport Plan (Examination Document TR10), section 3 of the Maylands Masterplan (ED4) and the Hemel Hempstead Town Centre Masterplan – Access and Movement Study (MP3). In the light of this evidence, Policies CS33: Hemel Hempstead Town Centre and CS34: Maylands Business Park include guiding principles to improve movement in these areas. Policies CS33 and CS34 include some important transport measures, for example, the completion of the North East Hemel Hempstead relief road. More detailed transport measures are included in the Draft Hemel Hempstead Town Centre Masterplan (Examination Document MP4) and will also appear in the revised Maylands Gateway Development Brief.

- 5.4.3 With regard to electronic communications networks, there is a 'saved' policy in the Dacorum Borough Local Plan (Examination Document OT1), namely, Policy 126: Electronic Communications Apparatus. This policy will continue to be saved after the Core Strategy is adopted.
- 5.4.4 The Core Strategy does not deal specifically with electronic communications networks. However, Policy CS14 does refer generally to '*development that supports the knowledge-based economy, the transition to a low carbon economy, the rural economy and sustainable tourism*' being especially encouraged. Development related to the delivery of improved electronic communication would fit within this. Appendix A in the Local Development Scheme (Examination Document OT3) indicates that revised guidance to replace Local Plan Policy 126 will be included in the Development Management DPD.
- 5.4.5 There is an acknowledged deficiency in broadband capacity across the Maylands Business Park. The new Sustainable Community Strategy 'Destination Dacorum' (see paragraph 5.1.15 above) recognises the need to tackle this problem. In addition, the Dacorum Development Programme (Examination Document OT5) includes an explicit reference to improved broadband, specifically to the Maylands area as one of the targets for 2011-12 (see the 'Care and retention' project on page 16). The Hertfordshire Local Enterprise Partnership (LEP) has obtained funding from the Department of Business Innovation and Skills to help address broadband capacity across business parks in the county. Maylands is seen as the top priority. The LEP, the Council and local businesses are working together and a grant scheme has been set up to offset the costs of increasing broadband speeds.
- 5.4.6 The floorspace figures in Policy CS16 are based on robust evidence – see section 3 in the Retail Study Update (Examination Document ED13). However, paragraph 3.7 in the Retail Study Update stresses that limited reliance should be placed on expenditure and capacity estimates beyond ten years. Therefore, the Council has proposed to amend Core Strategy paragraph 13.2 accordingly (see minor change MC21 in the Report of Representations - Examination Document SUB5). In addition, the situation is currently particularly uncertain due to the recession and the growth in internet shopping. As a result, the floorspace capacity figures in Policy CS16 are not expressed as firm targets to be achieved.
- 5.4.7 Also, due to the high level of uncertainty, paragraph 2 in Policy CS16 opens by stating that: "*opportunities will be given to provide capacity for the following amounts of floorspace if there is demand*". The floorspace figures in this paragraph are derived from the Retail Study Update. These figures are quite modest except for comparison shopping in Hemel Hempstead town centre, where the identified need is for 47,500 sq. metres net of additional floorspace by 2031, although over two thirds of this is not required until after 2021.
- 5.4.8 Bullet point 1 in the delivery section following Policy CS16 states that designation of specific sites and consideration of their delivery will be through

the Hemel Hempstead Town Centre Masterplan, the Site Allocations Development Plan Document and the East Hemel Hempstead Area Action Plan. However, given the level of uncertainty, it will be important to assess future demand through further revisions to the Retail Study Update and through monitoring, as indicated under 'monitoring' following Policy CS16.

5.4.9 In considering the floorspace figures in Policy CS16, it is also necessary to look at the conclusions in section 5 of the Retail Study Update, which are summarised below:

Town centre	Convenience	Comparison
Hemel Hempstead	Allocate a site for a superstore in the town centre to meet the identified need.	No specific allocations for this floorspace should be made in the short to medium term, given current vacancies and the trading performance of existing stores.
Berkhamsted and Tring	The requirements for both convenience and comparison goods floorspace are modest and does not require any specific allocation in the short/medium term to 2016/2021.	

5.4.10 It should also be noted that the Draft Hemel Hempstead Town Centre Masterplan (Examination Document MP4) does not propose any major new comparison goods developments.

5.4.11 In view of the above, a further minor change is proposed to guiding principle 1 in Policy CS33 (Hemel Hempstead Town Centre), to refer to the proposed superstore in the Gade Zone.

5.4.12 Core Strategy paragraph 13.3 states that a new local centre will be created at the Heart of Maylands, but this is not specifically proposed in Policy CS16. However, the new local centre is referred to in guiding principle 1(c) in Policy CS34: Maylands Business Park. Policy CS34 is considered to be the most appropriate location for the policy reference within the plan. There can be further elaboration within the East Hemel Hempstead Area Action Plan.

5.5 Is sufficient support provided for the retention and strengthening of local shopping centres? Is the classification of the various locations of retail provision (Table 5) appropriate and justified? What is the role of Jarman Fields retail centre and is its designation as an out-of-centre location justified?

5.5.1 Policy CS16: Shops and Commerce provides support for local shopping centres. Sentence 3 in paragraph 1 states that most retail development will be directed to the town and local centres. Also, sentence 2 in paragraph 4 states

that centres other than Hemel Hempstead town centre will provide core shopping facilities and services for their local communities. Further guidance on local centres is provided in Pre-Submission Core Strategy paragraphs 13.3, 13.4 and 20.10. The Council has proposed an amendment to paragraph 13.3 (see minor change MC22 in the Council's Report of Representations: Examination Document SUB5), to reinforce the Council's support for the provision and retention of shops and services in local centres.

5.5.2 The Dacorum Borough Local Plan (Examination Document OT 1) provides more detailed guidance on local centres in Policies 39-41 and 43. Furthermore, the local centres are shown on the Proposals Map. Policies 39-41 will be superseded once the Core Strategy is adopted, but Policy 43 (shopping areas in local centres) will continue to be saved. Policy 43 provides detailed guidance on the retention of existing shopping in local centres. Revised detailed guidance will be provided in the Development Management Development Plan Document (see bullet 2 in the delivery section following Policy CS16).

5.5.3 It is considered that the level of detail on local centres is appropriate for a Core Strategy. Taken together, the Core Strategy and Policy 43 in the Dacorum Borough Local Plan provide sufficient support for the retention and strengthening of local shopping centres. However, a further minor change is suggested to the Core Strategy, in order to clarify the position. It is proposed that Policy CS16 is modified to refer to the retention of existing shops in town and local centres. The proposed additional text reflects point (b) in Local Plan Policy 38.

5.5.4 The classification of the various locations of retail provision in the retail hierarchy (Table 5) is considered to be appropriate and justified. The retail hierarchy largely reflects that set out in Dacorum Borough Local Plan Policy 39. It remains a sound and robust approach and is supported by technical evidence. There are two differences between the retail hierarchy in the Local Plan and that included in the Pre-Submission Core Strategy:

- The Local Plan designates Hemel Hempstead, Berkhamsted and Tring as town centres. However, the Core Strategy shows Hemel Hempstead as the principal town centre and Berkhamsted and Tring as secondary town centres.
- The Local Plan designates Jarman Fields as a local centre with a district shopping function. In contrast, the Core Strategy (Table 6) shows it as an out of centre retail and leisure location.

5.5.5 The changes to the retail hierarchy described above are based on the advice in the 2006 Retail and Leisure Study (Examination Document ED2). The relevant advice in this study is summarised in paragraphs 5.5.6 and 5.5.7 below.

5.5.6 The 2006 Retail and Leisure Study contained the following advice on the position of the town centres in the retail hierarchy:

Town centre	Paragraph in ED 2	Summary of advice in ED 2
Hemel Hempstead	1.2	In terms of retail hierarchy, Hemel Hempstead has substantially the largest and most important town centre in the borough.
Berkhamsted	1.12	In hierarchical terms, Berkhamsted is substantially secondary to Hemel Hempstead. The town centre is much smaller and has a limited range of retailers.
Tring	1.17	Tring is the smallest of the three town centres in Dacorum. In the hierarchy of centres it functions as a small town centre serving only the day-to-day local shopping needs of the town population.

5.5.7 Paragraph 9.74 in the 2006 Retail and Leisure Study stated that Jarman Fields is functioning as an out of centre food superstore and retail/leisure park. The consultants concluded that the designation as a local centre was no longer appropriate in view of its role and function. Jarman Fields contains a large Tesco superstore, a drive through McDonalds and leisure uses. There are no local shops. Since the 2006 Retail and Leisure Study was written, planning permission has been granted for 6,700 sq. m (gross) of bulky goods retail warehousing. This underlines the case for designating Jarman Fields in the Core Strategy as an out of centre retail and leisure location.

5.6 What is the role of the Borough in terms of tourism? Is sufficient guidance given on the Council's approach to the issue?

5.6.1 Core Strategy paragraph 11.15 states that Dacorum is not a main tourist destination, but does attract leisure and business visitors. The Borough has some attractions which have local and sub-regional importance, including:

- Chilterns Area of Outstanding Natural Beauty (particularly Ashridge, with its National Trust beechwoods and chalk downland)
- Grand Union Canal
- Tring Zoological Museum
- Tring Reservoirs
- Berkhamsted Castle
- Hemel Hempstead Snow Centre and XC (Extreme Centre) at Jarman Park
- The paper making heritage in Hemel Hempstead
- Long distance footpaths (shown on Pre-Submission Core Strategy Figure 28)

5.6.2 Paragraphs 11.15-11.17 of the Pre-Submission Core Strategy provide guidance on supporting tourism. These paragraphs explain the need to support sustainable tourism and increase visitor accommodation. The point is also made that the tourism sector is linked to the area's cultural facilities (see Core Strategy paragraphs 15.22-15.25). Paragraph 2 in Policy CS14: Economic Development encourages development that supports sustainable tourism.

5.6.3 Section 9 in the Dacorum Borough Local Plan contains detailed policies on leisure and tourism and the main tourism policies are:

- Policy 90: Tourism
- Policy 91: Hotels and guest houses in towns and large villages
- Policy 92: Hotels and guest houses in the Green Belt and the rural area
- Policy 93: Bed and breakfast accommodation
- Policy 95: Camping and caravanning

5.6.4 All the above policies will continue to be 'saved' after the Core Strategy is adopted. Revised detailed guidance will then be provided in the Development Management Development Plan Document (see bullet 2 in the delivery section following Policy CS14). It is considered that, in combination, the Core Strategy and the 'saved' policies in the Dacorum Borough Local Plan provide sufficient guidance on the Council's approach to tourism.

5.6.5 However, it should be noted that the development plan is only one of the ways in which the Council supports tourism, as shown below:

- The Council works in partnership working with the National Trust, the Chilterns Conservation Board and other bodies.
- One of the six ambitions in Destination Dacorum, the Council's new Sustainable Community Strategy (Examination Document BP7), is to make Dacorum a great destination. Dacorum and all it has to offer will be promoted to the local community, to visitors and to businesses. The action to achieve this ambition will include a project involving various agencies to promote the area.
- The Council is about to advertise a new post for a Tourism and Marketing Officer, to facilitate a more pro-active approach to the issue. The post will have strong links with planning as the Officer will sit within the Strategic Planning and Regeneration Team. One of the main responsibilities of the postholder will be the development and delivery of a tourism strategy.