



Dacorum Borough Council

Local Planning Framework

DACORUM SITE ALLOCATIONS DPD EXAMINATION IN PUBLIC

Statement by Dacorum Borough Council

Matter 5: Employment & Retail

September 2016

Purpose of this statement

The purpose of this statement is to summarise the Council's position regarding the following matters, issues and questions 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 and the Council's response

EMPLOYMENT

Note:

The Inspector has confirmed that references to 'employment' mean the B-class uses. These uses are defined in the Town and Country Planning Use Classes Order as follows:

- 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. What are the key employment land and jobs targets? What is their origin and are they justified? Is the overall amount of employment provision and its distribution in the Plan consistent with the Core Strategy?

(a) What are the key employment land and jobs targets?

- 1.1 Dacorum's Core Strategy (Examination Document CS4) was adopted on 25 September 2013 and sets a clear strategic policy framework through which to progress the Site Allocations DPD.
- 1.2 Policies that relate directly to the provision of offices, industry, storage and distribution are:
- CS14: Economic Development; and
 - CS15: Offices, Research, Industry, Storage and Distribution
- 1.3 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.
- 1.4 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.

(b) What is their origin and are they justified?

1.5 The evidence for the key employment land and jobs targets in the Core Strategy 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 (Examination Document ED8);
- 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 (Examination Document ED7); 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 (Examination Document ED4).

1.6 The 2009 London Arc Study assessed the industrial/warehouse and office markets in the study area. It also looked at employment sites and areas and forecasts labour demand and supply. The study put forward the 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.

1.7 The 2010 South West Hertfordshire Employment Land Update advised Dacorum and Three Rivers Councils on employment land policies for inclusion in their emerging development plans. 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.

1.8 The study set out the consultants' recommendations for designating new sites (in addition to existing commitments) and for releasing existing sites. These recommendations included:

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

1.9 The 2011 Dacorum Employment Land Update study contained revised recommended quantitative targets for employment land in Dacorum to 2031. Also, a revised economic forecast estimated a job growth of some 9,700 in the Borough, broken down as shown below:

Employment change 2006-2031	
Industry and warehousing	-3,441
Offices	7,284

Non-B jobs	5,863
All jobs	9,702

1.10 Given the above forecast, the study (paragraph 6.3) suggested the Core Strategy should aim to provide land to accommodate around 10,000 jobs in the 2006-2031 plan period. This advice was incorporated into Core Strategy Policy CS14.

1.11 Paragraph 5.5 in the study translated the employment change forecasts into forecasts of demand for B-class floorspace as follows:

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

1.12 Paragraphs 5.7-5.17 in the study advised on floorspace targets for B-class uses. The study looked at the planned supply of land, which 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 (which is not covered by the Site Allocations document).

1.13 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 was incorporated into Core Strategy Policy CS15.

1.14 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."

1.15 Therefore, 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.

1.16 In conclusion, the Council considers that the key employment land and jobs targets in the Core Strategy are justified and that they continue to be justified for

the purposes of the Site Allocations process. More detailed information can be found in paragraphs 1.24-1.39 of the Strengthening Economic Prosperity Background Issues Paper (January 2016) (Examination Document SA1).

1.17 The evidence base for the new Local Plan will include two key documents dealing with employment issues:

- South West Hertfordshire Economic Study February 2016:

<http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/new-single-local-plan/technical-work-for-the-early-partial-review>

This study was commissioned by Dacorum, Hertsmere, Three Rivers and Watford Councils. The key aim of the Economic Study is to identify the scale and characteristics of employment growth that the functional economic market area (FEMA) might plan for over the 2013-2036 period, and the requirements for employment land and floorspace that this entails. In light of the evidence, the SW Hertfordshire FEMA covers the commissioning authorities and St Albans.

- Dacorum Employment Land Availability Assessment. The Council has appointed consultants to advise (in the light of the South West Herts study) on the quantity, mix and geographical spread of employment land that should be provided in the period to 2036. The Assessment will advise the Council what new land (if any) should be identified for B-class uses and what existing employment sites (if any) should be allowed to transfer to other uses. This study is currently in progress and is expected to be completed in early autumn.

1.18 It should be emphasised that the above studies should not affect the conclusions reached on Matter 5, for the reasons explained by the Council in its response to Matter 2, Question 16.

(c) Is the overall amount of employment provision and its distribution in the Plan consistent with the Core Strategy?

1.19 When considering this question, it is important to take full account of the contribution from the Maylands area, although it is not covered by the site Allocations document. Maylands contains the Borough's principal employment area (Maylands Business Park) and main employment development site (Maylands Gateway). Core Strategy paragraph 12.2 states that the majority of the jobs growth forecast for employment uses will be directed to Maylands, whilst Figure 18 indicates that Maylands Gateway offers around 29.7 ha. of developable land. Detailed guidance on the Gateway site is provided in the Maylands Gateway Development Brief (Examination Document AA2).

1.20 The Council's Authority Monitoring Report 2014/2015 (AMR) (Examination Document BP1) provides monitoring information on the Core Strategy's key employment land and jobs targets. Monitoring information on Policy CS14 is

provided in paragraphs 6.1-6.9 in the AMR, whilst paragraphs 6.10-6.25 relate to Policy CS15.

- 1.21 Paragraph 6.2 in the AMR shows that job numbers in the Borough increased by 3,900 between 2006 and 2014. This is a fairly good performance given the length and depth of the recent recession. The Policy CS14 job growth target for the whole plan period continues to be seen as realistic and achievable, particularly given the Council's proactive approach towards promoting economic development. Furthermore, unemployment in the Borough is low and is well below the regional average.
- 1.22 The Strengthening Economic Prosperity Background Issues Paper (Examination Document SA1) was updated in January 2016 contains more detailed and up-to-date information on employment land provision than the AMR. Paragraphs 1.83-1.92 in the Issues Paper consider employment land supply, taking account of the proposals in the Site Allocations document. Table 5 in the Issues Paper summarises the employment floorspace calculations as at January 2016. Estimated total floorspace change 2006-2031 will be approximately:
- Offices: net loss of 50,000 sq. metres
 - Industrial/warehousing: net gain of 69,000 sq. metres
- 1.23 It is acknowledged that these estimates are not wholly consistent with the targets in Core Strategy Policy CS15 (see paragraph 1.4 above). Nevertheless, the Council does not consider that the Borough has an employment land supply problem for the following reasons:
- Although a substantial reduction of office floorspace is forecast during the 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 period to 2031.
 - Despite the fall in B-class floorspace since 2006 and the recent recession, the local economy is relatively healthy (see paragraph 1.18 above).
 - The Employment Land Review 2011 advised that the forecast demand for offices may not materialise and that there may be a need for managed release of sites which are no longer attractive, viable or suitable for offices (see paragraph 1.14 above).
 - There has been a very large supply of office development land available at Maylands Gateway for many years, but no market demand for new office building in the Borough. This has remained the case during the current economic recovery. Therefore, the Council has taken a pragmatic decision to accept other uses on part of the Gateway site, principally retail and warehousing, which will still provide jobs.
 - If market demand continues (as expected) to be mainly for industrial/warehousing development rather than offices, meeting this

demand would comply with the National Planning Policy Framework (paragraph 21, bullet 3).

- Declining office employment densities caused by changing working practices are reducing the need for office floorspace. The Employment Land Review 2011 assumed one office worker per 18 sq. metres gross floorspace. However, the South West Hertfordshire Economic Study (February 2016) advised in paragraph 6.46 that 14.4 sq. metres should be assumed, as per the HCA Employment Density Guide (November 2015).

1.24 After considering the above factors, the Council concludes that sufficient land is available for employment development in the Borough, whilst complying with the requirements of the NPPF to be flexible in terms of responding to changes in market demands.

1.25 The Council's conclusion on Question 1(c) is reinforced by the proposal for major employment development at East Hemel Hempstead in the submitted St Albans Strategic Plan:

http://stalbansconsult.limehouse.co.uk/portal/planning_policy/strategic_local_plan_2016/slp2016?pointId=1452011871097

1.26 Policy 13B in this Plan proposes mixed use development in the East Hemel Hempstead (South) Broad Location, including:

- Significant scale employment provision for a range of uses including: offices, research and development, light industrial and logistics; broadly within the 55 Ha area north of Breakspear Way and south of Punchbowl Lane
- Sufficient variety of employment uses must be provided over time to offer in the order of up to 8,000 jobs. Over-concentration of low employment generating logistics uses will not be permitted

1.27 Job numbers may be considerably less than 8,000 stated unless a high proportion of office jobs are provided. This seems unlikely given current market conditions. Nevertheless, East Hemel Hempstead site is expected to provide a major source of new jobs and the site will form an extension to the Maylands Business Park. Although the St Albans Plan does not state that these jobs should count towards meeting Dacorum's needs, it seems probable that many of them will be taken by Dacorum residents and the area will be perceived by the market as part of Hemel Hempstead.

1.28 The issue of the distribution of employment provision in the Site Allocations Plan is considered under Question 2 below.

2. Are there sufficient employment sites available of the appropriate nature and in the right place to meet anticipated needs? Where are the main sites? Are all of these to be safeguarded?

(a) Are there sufficient employment sites available of the appropriate nature and in the right place to meet anticipated needs?

2.1 The Dacorum Borough Local Plan 1991-2011 (Examination Document OT6) identifies:

- General Employment Areas (GEAs) in saved Policy 31;
- two employment areas in the Green Belt (saved Policy 32); and
- proposed employment development sites in the Schedule of Employment Proposal Sites.

2.2 Core Strategy Policy CS4: The Towns and Large Villages states that appropriate employment generating development will be encouraged in GEAs. The GEAs are existing employment areas, but some of them have scope for new employment development. 'Saved' Local Plan Policy 31 proposes a range of B-class uses on the GEAs, whilst 'Saved' Policy 32 states that employment generating uses will be retained in the employment areas in the Green Belt. The Schedule of Employment Proposal Sites consists of seven sites proposed for employment development within GEAs.

2.3 The Council has carried out a review of employment areas and sites and this is set out in the Strengthening Economic Prosperity Background Issues Paper (Examination Document SA1). This review 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.

2.4 The review of employment areas and sites concluded that there is no need to allocate any new employment areas in the Site Allocations Plan (see paragraphs 1.66 and 1.67 in Examination Document SA1). 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.

2.5 Appendix 1 in the Issues Paper looked at all the areas and sites referred to in paragraph 2.1 above, and also:

- Local Plan Policy 33 sites (conversion of employment land to housing and other uses)
- other areas and sites assessed in the SW Hertfordshire Employment Land Update 2010 (Examination Document ED7)

2.6 For each location, the review considered whether the existing proposals should be retained, whether their boundaries should be changed and whether the types of employment development proposed should be amended. The review also took account of the site specific recommendations in the 2010 Employment Land Update and any recent changes in circumstances. No recommendations were made for the Maylands Business Park, as decisions will be made in the single Local Plan.

- 2.7 The conclusions of the review are summarised in paragraphs 1.72-1.82 of the Issues Paper. The review concluded that 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, therefore, important that B-class uses on the GEAs are protected. Consequently, the Council's general approach is to retain the GEAs and make changes only where there is clear justification.
- 2.8 Nevertheless, the review concluded that a number of GEAs should be reduced in size to reflect site specific factors, for example, where non-B class development has already taken place or is committed. The main changes recommended are outlined in paragraph 3.4 below.
- 2.9 The review also concluded that:
- the Policy 32 employment areas in the Green Belt should be retained, but with amended boundaries.
 - None of the sites on the Local Plan's Schedule of Employment Proposal Sites should be carried forward into the Site Allocations Plan. The reasons include the fact that employment development has been completed on three sites, whilst two of the sites still undeveloped are at Maylands (which is not covered in the Site Allocations Plan).
 - None of the sites covered by the bullet points in paragraph 2.5 above should be included in the Site Allocations Plan.
- 2.10 The Site Allocations Plan reflects the conclusions of the review of employment areas and sites. It identifies:
- General Employment Areas (GEAs) in Policy SA5;
 - Two employment areas in the Green Belt in Policy SA6; and
 - A Schedule of Employment Proposals and Sites, which contains two sites.
- 2.11 The Council concludes that there are sufficient employment sites available of the appropriate nature and in the right place to meet anticipated needs. In particular, it should be noted that:
- The Borough has a substantial portfolio of existing employment areas, as identified in Local Plan Policy 31 and Site Allocations Policies SA5 and SA6.
 - The guidance in these policies on types of employment uses within each employment area means that there is sufficient scope for all types of B-class uses to be well represented in the Borough.
 - There is also a wide range of size of premises, providing accommodation for small, medium and large enterprises.
 - A high proportion of the employment areas are in Hemel Hempstead, particularly in Maylands, but there is also provision in Berkhamsted and Tring, a small GEA in Markyate and the two employment areas in the Green Belt. This gives a good spread of employment areas across the Borough.
 - Although there are only two sites in the Site Allocations' Schedule of Employment Proposals and Sites, there is also a considerable quantity

of employment development land at Maylands, particularly on the Maylands Gateway site.

(b) Where are the main sites?

- 2.12 The main employment areas are those listed in Site Allocations Policies SA5 and SA6, and also the GEAs at Maylands in the table in saved Local Plan Policy 31. The main proposed employment development sites Maylands Gateway (see paragraph 1.19 above) are those referred to in the final bullet in paragraph 2.11.
- 2.13 As explained in paragraph 1.19, the Borough's principal employment area is the Maylands Business Park. Apart from Maylands, the largest concentrations of GEAs in Dacorum are at:
- *Two Waters/Apsley*: the six GEAs in Hemel Hempstead in the Policy SA5 table are all within the Two Waters/Apsley area.
 - *Berkhamsted*: three GEAs adjoin each other are located in the eastern part of the town. Northbridge Road is Berkhamsted's principal GEA.
 - *Tring*: Tring's main GEA is Icknield Way, which is located close to the A41 on the west side of the town.
- 2.14 Hemel Hempstead, Berkhamsted and Tring town centres also have an important role in providing B-class jobs, although this role has been reducing in recent years, mainly due to the loss of offices stemming partly from office to residential prior approval conversions.

(c) Are all of these to be safeguarded?

- 2.15 The GEAs and employment areas in the Green Belt are safeguarded for B-class uses either through policies in the Core Strategy and Site Allocations DPDs, or, through 'saved' Local Plan policies, where the land falls within the Maylands area. The employment proposal sites are also safeguarded in a similar manner. Whilst employment uses are encouraged in the town and local centres, such uses in these locations are not subject to any specific safeguarding. Further detail regarding these 'safeguarding' policies is set out in Appendix 1.
- 2.16 It is noted however that the degree of safeguarding in both GEAs and employment areas in the Green Belt has been reduced by the Housing and Planning Act. The Act allows changes of use from offices to housing, demolition and rebuilding of office buildings for new housing, and conversions of B1(c) light industrial buildings 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.
- 2.17 The Dacorum Employment Land Availability Assessment (see paragraph 1.17 above) will advise the Council whether any existing or potential new employment sites are of strategic significance, which should be protected from changes of use to housing by Article 4 Directions. Currently there are no such directions in force in the Borough.

3. How much land will be lost from employment use as a result of allocations in the Plan? Is it anticipated that other employment land will be lost to other uses over the Plan period?

(a) How much land will be lost from employment use as a result of allocations in the Plan?

3.1 Pages 50-55 in the Site Allocations Map Book (Examination Document SUB2) show the proposed changes to the boundaries of the GEAs. Some of the proposed changes will remove land from the GEAs that is no longer in B-class use. Other proposed changes involve non-employment allocations on land that is still used for B-class purposes. However, as stated in paragraph 2.7 above, the Council's general approach is to retain the GEAs and make changes only where there is clear justification.

3.2 Table 3 in the Strengthening Economic Prosperity Background Issues Paper (Examination Document SA1) shows 12 GEAs where deletion or amended boundaries are recommended. These recommendations have been carried forward into the Site Allocations Plan.

3.3 The main changes recommended to the GEAs compared with those currently defined under on the Policies Map are:

- *Frogmore GEA, Hemel Hempstead*: reallocate most of the GEA for housing, because of the restricted access and the scope for housing.
- *Nash Mills GEA, Hemel Hempstead*: delete because nearly all the site is being redeveloped for housing.
- *Paradise GEA, Hemel Hempstead*: reclassify as a mixed use proposal and reduce in size, due to its inclusion in the town centre, as part of the site has been redeveloped for housing and as there is scope for further limited housing development in a mixed use scheme.

3.4 The GEAs where the Site Allocations Plan contains site specific proposals for non-B uses are shown below. In all cases, non B-class uses are proposed on only part of the GEA.

GEA	Non-employment proposals in Site Allocations	Site area (ha.)	Comments
Billet Lane, Berkhamsted	Mixed use proposal MU/7: new foodstore and housing (0.6 ha.)	0.6	Planning permission granted for retail and housing.
Paradise, Hemel Hempstead	Mixed use proposal MU/3: B1 led business and housing (75 homes) (3.0 ha.)	3.0	The majority of MU/3 is expected to stay in B-class use.
Apsley Mills, Hemel Hempstead	Housing allocation H/9 (0.9 ha.)	0.3	Vacant land. Planning permission granted for housing.
Corner Hall, Hemel	Housing allocation H/10 (0.13 ha.)	0.13	Used for car washing (not a B-class use).

Hempstead			
Frogmore, Hemel Hempstead	Housing allocation H/13	3.0	
Two Waters, Hemel Hempstead	Housing allocation H/2 (part)	0.71	Forms part of the former gas works site.
	Table 1: Out of centre retail locations	n/a	Aldi supermarket already built.
Icknield Way, Tring	Housing allocation H/20	0.27	Not used for B-class purposes.
Akeman Street, Tring	Housing allocation H/17	0.23	Planning permission granted for housing.
Markyate (Hicks Road)	Housing allocation H/19	0.12	Proposed for mixed use development in the Core Strategy (strategic site SS2). Proposed for housing in the Hicks Road Masterplan 2012.

- 3.5 The amendments to GEA boundaries referred to in paragraph 3.2 involve the loss of 8.36 hectares of land in the GEAs, excluding the already built Aldi supermarket. However, it should be noted that:
- Planning permission has already been granted for non B-class uses at Billet Lane, Apsley Mills and Akeman Street. Also housing is proposed on the H/9 site in the Hicks Road Masterplan. Furthermore, the proposed housing allocations at Corner Hall, Two Waters and Icknield Way are not used for B-class purposes. If these sites are excluded, the 8.36 hectares figure is reduced to 6 ha; and
 - The loss at Icknield Way will be more than balanced by a larger employment proposal site (site E/1: 0.75 ha.) at the other end of this GEA.
- 3.6 This leaves only Paradise (3 ha.) and Frogmore (3 ha.). However, it is envisaged that the majority of the Paradise site will remain in B-class use and that the loss of existing employment floorspace there will be approximately balanced by new floorspace. With regard to Frogmore, the 2010 South West Hertfordshire Employment Land Update (Examination Document ED7) recommended that all this GEA should be reallocated for alternative uses.
- 3.7 The Site Allocations plan also proposes housing development on four employment sites not formally designated as GEAs in the Local Plan:
- H/4: Ebbens Road, Hemel Hempstead (1.0 ha.)
 - H/8: 233 London Road, Hemel Hempstead (0.1 ha.)
 - H/16: Western Road, Tring (0.47 ha.)
 - H/19: Corner of Hicks Road/High Street, Markyate (0.12)
- 3.8 The H/4 and H/16 sites are already proposed for housing by the Local Plan, in Policy 33 (conversion of employment land to housing and other uses) and in development briefs. These sites considered in Examination Document SA1 (see paragraph 1.78 and Appendix 1). Housing development has now been permitted

on the majority of the H/4 site. Sites H/8 and H/19 are very small sites located in local centres and H/19 is only partly in B-class use.

- 3.9 From the above information, it is concluded that the Site Allocation plan is not seeking a substantial loss of employment land and that most of the proposed losses are already proposed for housing in the Local Plan; have planning permission for housing redevelopment; are not currently in B-class use or were recommended for other uses in the 2010 employment study.
- 3.10 In considering this question, the Council has reached the view that a minor change should be made to the Plan in respect of the Paradise site. It is proposed that the following sentence should be inserted after sentence 1 of the planning requirements for proposal MU/3 in the Schedule of Mixed Use Proposals and Sites:

“Development brief required.”

This new sentence has been included in the Council’s Matter 2 Appendices statement as a minor change.

- 3.11 The Paradise site is owned by a number of parties and unless a development brief or master plan is prepared there is a danger that redevelopment could proceed through a number of ad hoc uncoordinated applications, which might not produce a well-planned overall result. Adding a requirement for a development brief into the planning requirements for MU/3 would be consistent with the approach taken to the other major mixed use proposals sites (i.e. sites MU/1, MU/2 and MU/4-MU/6).

(b) Is it anticipated that other employment land will be lost to other uses over the Plan period?

- 3.12 It is envisaged that some other employment land will be lost to other uses over the Plan period through committed losses and other losses on identified sites, and also from sites not currently identified. These are considered in turn below:

Committed losses and other losses on identified sites:

- 3.13 The Council holds information on all committed losses at 1 April 2015. A draft update to 1 April 2016 has also been produced. Appendix 3 in the Strengthening Economic Prosperity Background Issues Paper (Examination Document SA1) 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 takes account of the proposals in the Site Allocations document. It also includes sites with planning permission and other potential sites.
- 3.14 Apart from the sites mentioned in the response to Question 3 (a) above, Appendix 3 of the Background Issues Paper includes some other likely losses of employment land. The most significant committed losses are prior approval office to residential conversion schemes. The Background Issues Paper also states that over 26,000 sq. metres of office floorspace has been given prior

approval for conversion to housing. Most of these schemes are located in the town centres or on GEAs. Some further schemes have been granted prior approval since the Issues Paper was drafted. However, it remains uncertain how many of the schemes approved under the prior approval regime will be implemented.

3.15 Appendix 3 of the Background Issues Paper includes some other likely losses of employment land, the largest being located at:

- The Heart of Maylands, where the Council is promoting a new local centre through Policy CS34 and Figure 18 in the Core Strategy (Examination Document CS4) and a development brief. This scheme could result in a net loss of over 13,000 sq metres of B-class floorspace. However, the new local centre will provide much improved amenities for the businesses on Maylands and help to retain existing firms and attract new ones.
- Bourne End Mills (shown as an employment area in the Green Belt in Site Allocations Policy SA6), where the Council has now approved application 4/03072/15. This involves some housing development and a net loss of around 5,500 sq metres of B-class floorspace. The application was approved because previous proposals for redevelopment of this low quality employment area were proven to be unviable.

3.16 Most of the other anticipated losses of employment land are relatively minor. All the estimated losses have been taken into account in the conclusions on employment land supply in paragraphs 1.83-1.92 of the Background Issues Paper. The Council does not consider that the Borough has an employment land supply problem for the reasons stated in paragraph 1.23 above.

Losses on unidentified sites:

3.17 Some other losses of employment land are likely to occur during the Plan period from the following sources:

- **Prior approval schemes:** further prior approval schemes for office to residential conversions are likely. The Housing and Planning Act may also result in prior approval schemes for rebuilding of office buildings for new housing, and conversions of B1(c) light industrial buildings to housing.
- **Losses in town and local centres:** as stated in response to Question 2 (c) above, employment uses in the town and local centres are not safeguarded by the Council's planning policies. Also, some of the town centre office space is not well suited to modern business requirements. Therefore, further losses are likely to occur including from prior approval schemes.
- **Losses of other land with established employment generating uses:** some losses are likely on the basis of saved Local Plan Policy 34. This

policy allows for non-employment development in most circumstances on sites not included within the minimum supply of employment land (see Core Strategy Policy CS15) or sites identified for housing in Local Plan Policy 33.

- 3.18 It is not possible to make an accurate assessment of the likely scale of losses of land and floorspace from the sources described in paragraph 3.17. Further consideration will be given to this issue in the Dacorum Employment Land Availability Assessment and when decisions are made about employment land needs in the new Local Plan.

4. How much of the land allocated for employment uses has already been built out? What are the implications of this going forward?

(a) How much of the land allocated for employment uses has already been built out?

- 4.1 The Inspector has confirmed that this question relates to land allocated for B-class development in the Site Allocations Plan. It is assumed that this means the employment areas listed in Site Allocations SA5 and SA6, and sites on the Schedule of Employment Proposals and Sites. The Council has also interpreted Question 4(a) as referring to completed gains and losses of employment floorspace on these allocations since the Site Allocations Pre-Submission document was prepared in 2014.
- 4.2 The Dacorum Employment Land Position Statement No. 29 (Examination Document ED1) contains a schedule of floorspace gains completed during the April 2014-March 2015 period. Completed floorspace losses are not included in document ED1, but the Council holds information on such losses.
- 4.3 Paragraphs 6.11-6.15 in the Authority Monitoring Report (Examination Document BP1) provide information on employment floorspace change in 2014/2015. During the monitoring year there was a net loss of 2,000 sq metres of B-class floorspace in Dacorum, but there were no significant changes in respect of the land allocated for employment in the Site Allocations Plan.
- 4.4 Draft schedules of completed floorspace losses and gains in 2015-2016 have been produced. They indicate that there was a net loss of over 6,500 sq metres of B-class floorspace during the year. The only changes of any great note on the land allocated for employment in the Site Allocations Plan all involve recycling of existing employment land in the following locations:
- Corner Hall General Employment Area (GEA): loss of over 3,000 sq metres of offices through an office to residential prior approval scheme.
 - Two Waters GEA: gain of over 9,700 sq metres through completion of a self-storage facility.

- Bourne End Mills (see paragraph 3.13 above): loss of nearly 12,000 sq. metres of employment space. Work has now commenced on the replacement employment development (see paragraph 3.13 above).

(b) What are the implications of this going forward?

- 4.5 The completions referred to in response to Question 4(a) above do not change the overall conclusions on employment land supply in paragraphs 1.83-1.92 of the Strengthening Economic Prosperity Background Issues Paper (Examination Document SA1). The Council does not consider that the Borough has an employment land supply problem for the reasons stated in paragraph 1.23 above.
- 4.6 Further consideration will be given to this issue in the Dacorum Employment Land Availability Assessment, which is currently being prepared to inform the new Local Plan (which will incorporate the early partial review of the Core Strategy), and when decisions are made about employment land needs in the new Local Plan itself.

5. Are there any committed employment sites in the District that have not yet been developed?

- 5.1 The Inspector has confirmed that 'committed employment sites' means sites with planning permission for B-class development.
- 5.2 The Dacorum Employment Land Position Statement No. 29 (Examination Document ED1) contains a schedule of commitments for floorspace gains at 1 April 2015. Commitments for losses are not included in document ED1, but the Council holds information on such losses.
- 5.3 Paragraphs 6.16-6.22 in the Authority Monitoring Report (Examination Document BP1) provide information on employment floorspace commitments at 1 April 2015. Table 6.11 shows the main committed changes in employment floorspace. All these changes are on sites in the Maylands Business Park (which is not covered by the Site Allocations Plan), except Bourne End Mills where development is in progress (see paragraph 4.4 above).
- 5.4 Appendix 3 in the Strengthening Economic Prosperity Background Issues Paper (Examination Document SA1) 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) at January 2016. This appendix takes account of the proposals in the Site Allocations Plan. It also includes committed sites and other potential sites.
- 5.5 Draft schedules of commitments at 1 April 2016 have been produced. These schedules show commitments for employment floorspace gains of over 110,000 sq metres and losses of nearly 65,000 sq metres, giving a net gain of around 45,000 sq metres.
- 5.6 The largest unimplemented commitments for gains or loss of employment space in the Borough are on the Maylands Business Park, as shown below:

Site	Committed floorspace change
The Campus, 150 Maylands Avenue	Gain of 9,100 m ² offices
Heart of Maylands, Sites 2b & 2c	Loss of 2,300 m ² offices and 7,600 m ² industrial/warehousing. Possible new office building of 1,500 m ² .

- 5.7 Appendix 3 in the Background Issues Paper states that Aviva (owners of Maylands Gateway Site 2 on Maylands Avenue) say that planning permissions granted some years ago for nearly 51,000 sq metres of offices cannot lapse, because foundations have been dug. However, the Council has now approved Aviva's application for retail led development, containing only 3,000 sq metres of offices. This permission was granted for the reasons explained in paragraph 2.73 of the Background Issues Paper.

6. How many of the Plan allocations contain employment elements? Where are they located and what contribution will they make to job creation?

- 6.1 Two of the allocations in the submitted plan contain B-class employment elements. These sites are shown on the Schedule of Employment Proposals and Sites in the Plan:

- Proposal MU/3: Paradise/Wood Lane, Hemel Hempstead (area: 3.0 ha., use: mixed use)
- Proposal E/1: Icknield Way, Tring (area: 0.75 ha., use: business use (B1))

In addition, the Schedule of Mixed Use Proposals and Sites states that the proposal for Paradise/Wood Lane is for B1 led business and housing (75 homes).

- 6.2 Appendix 3 in the Strengthening Economic Prosperity Background Issues Paper (Examination Document SA1) contains the following floorspace change estimates for Paradise and Icknield Way:

Estimated floorspace change	
Paradise	Loss of 5,000 m ² industrial/warehousing; gain of 5,000 m ² offices
Icknield Way	Gain of 3,000 m ² of B1(c)/B2/B8 floorspace

- 6.3 The South West Hertfordshire Economic Study (February 2016), which has been prepared to inform the new Local Plan uses the HCA Employment Density Guide (November 2015) to translate floorspace change estimates into job estimates. By applying the updated employment densities in paragraph 6.46 of the Economic Study, a net increase of over 300 jobs is estimated at the Paradise and Icknield Way sites:

Estimated jobs change	
Paradise	Loss of 106 industrial/warehousing jobs; gain of 347 office jobs
Icknield Way	Gain of 64 B1(c)/B2/B8 jobs

- 6.4 The Paradise and Icknield Way sites represent only a small element of the total expected job change in the Borough. In particular, a considerable growth in jobs is envisaged at Maylands Gateway. A net increase of around 2,000 B-class jobs is estimated in the Borough between 2015 and 2031, made up of about 700 office jobs and 1,300 industrial/warehousing jobs. These estimates have been produced by applying the HCA's employment density assumptions to the floorspace change estimates in the Strengthening Economic Prosperity Background Issues Paper (Examination Document SA1) – see column 4 in Table 5 of this document.

RETAIL

7. Is the evidence on retail provision up-to-date and robust? How do current retail proposals fit within the overall strategy for retail development?

(a) Is the evidence on retail provision up-to-date and robust?

- 7.1 The evidence on retail provision 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)
- 7.2 The 2006 study (Examination Document ED10) was a wide ranging retail and leisure study of the Borough. It included quantitative forecasts of future shop floorspace need in each town to 2021.
- 7.3 The 2009 study (Examination Document ED9) took account of significant changes since 2006, including the opening of the Riverside Centre in Hemel Hempstead town centre. Updated forecasts of floorspace need were provided, informed by a new household interview survey of shopping patterns.
- 7.4 The 2011 Update (Examination Document ED3) considered the quantitative need for additional retail floorspace in the Core Strategy plan period to 2031. The study's conclusions are summarised below:
- There is a need for additional convenience goods floorspace to serve Hemel Hempstead. This need should be met in the town centre.
 - There is a theoretical capacity for additional comparison shopping in Hemel Hempstead over the study period. However, no specific allocation should be made for this floorspace in the short to medium term. This reflected vacant floorspace levels and the scope for existing floorspace to trade more intensively.
 - The Council should monitor the take up of vacant premises and trading performance of the existing town centre stores. Only when marked improvements are noted should the capacity and need for additional comparison shopping be revisited.

- Retail floorspace needs in Berkhamsted and Tring are very modest.
- The retail capacity for the three towns should be reviewed within the next five years in accordance with the guidance in PPS4.

7.5 The floorspace figures in Core Strategy Policy CS16: Shops and Commerce (Examination Document CS4) relate to the 2009-2031 period and are taken from the 2011 Update. Paragraph 3.7 in the 2011 Update stresses that limited reliance should be placed on expenditure and capacity estimates beyond ten years. In addition, the situation is currently particularly uncertain due to the recent recession and the growth in internet shopping. Therefore, paragraph 2.9 in the Strengthening Economic Prosperity Background Issues Paper (Examination Document SA1) states that:

“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.”

7.6 A more detailed summary of the 2006, 2009 and 2011 studies can be found in paragraphs 2.17-2.24 of the Background Issues Paper.

7.7 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.

7.8 However, the economy recovery has led to an increase in demand for convenience and comparison floorspace in Hemel Hempstead. Two Aldi supermarkets have been built, whilst planning permission has been granted for retail development at Jarman Fields and the Aviva site (see response to Question 7(b) below), and for the Heart of Maylands local centre. Also, a Lidl supermarket was refused permission on the Maylands Business Park. Another Lidl store was permitted, at Gossoms End/Billet Lane, Berkhamsted (see paragraph 9.4 below).

7.9 In view of the above, the Council recognises that there is a need to update the retail study, leading to revised shopping floorspace targets and (if appropriate) further site specific retail proposals. However, this is a matter for the new Local Plan (incorporating the early partial review of the Core Strategy), rather than the Site Allocations. The Council has been advised that this retail study update should not be carried out until a broad conclusion has been reached on the scale and distribution of housing development in the new plan.

7.10 Despite the acceptance of the need to update the retail evidence for the new Local Plan, the Council considers that the retail proposals in the Site Allocations area appropriate, for the reasons given below in the response to Questions 7(b), 8 and 9.

(b) How do current retail proposals fit within the overall strategy for retail development?

- 7.11 The Inspector has confirmed that this question relates to sites with current planning permissions for retail development. Currently, two sites benefit from unimplemented planning permissions for major retail development:
- Jarman Fields, Hemel Hempstead
 - Aviva site, Maylands Avenue, Hemel Hempstead
- 7.12 At Jarman Fields, outline planning permission has been granted on appeal for 10,305 sq. metres (gross internal area) of Class A1 retail floorspace. This proposal involves some 8,000 sq. metres net comparison goods floorspace and 800 sq. metres net convenience goods floorspace. The Council refused the application because of the harmful impact on Hemel Hempstead town centre. However, the appeal was allowed subject to a condition restricting the type of goods sold in order to protect the town centre.
- 7.13 Retail development at Jarman Fields fits well with the Council's overall strategy for such development. The site is proposed for mixed use development including shopping in the Local Plan (see Site 3 in the Schedule of Shopping Proposal Sites). It is also included in the Site Allocations Plan as Proposal S/1 in the Schedule of Retail Proposals and Sites.
- 7.14 Reference should be made to the Council's response to Question 9 below and Matter 15 for further consideration of Jarman Fields.
- 7.15 At the Aviva site, outline planning permission has been granted for 12,500 sq. metres of retail floorspace. The proposals are for a supermarket (2,350 sq. metres gross internal area) and non-food (comparison) retail (10,150sq. metres gross internal area).
- 7.16 The Aviva site is partly in a General Employment Area and partly defined as open land in the Local Plan. It is a key part of the Maylands Gateway site and was proposed for employment development in the Maylands Gateway Development Brief. Planning permission was granted previously for office development (see paragraph 5.7 above).
- 7.17 In considering the Aviva application, the Council obtained advice from retail consultants Peter Brett Associates and commercial consultants Chase and Partners. This proposal did not fit with the Council's overall retail development strategy, but the Council approved the application for a number of reasons including:
- The impact on Hemel Hempstead town centre and the local centres was unlikely to be significant and adverse, subject to conditions being attached to restrict the type of goods sold.
 - There appeared to be a quantitative need for some additional out of centre retailing in Hemel Hempstead.

- The town centre appeared 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 mitigate the impact on the town centre.

8. What is the basis for the retail allocations? Is there evidence that this is the appropriate amount for Dacorum?

(a) What is the basis for the retail allocations?

8.1 The Inspector has confirmed that this question relates to sites shown in the Site Allocations Plan's Schedule of Retail Proposals and Sites.

8.2 Paragraphs 2.60-2.75 in the Strengthening Economic Prosperity Background Issues Paper (Examination Document SA1) consider which sites should be allocated for retail development in the Site Allocations Plan. Table 10 in the Background Issues Paper reviewed the sites on the Local Plan's Schedule of Shopping Proposal Sites and concluded that only one site should be allocated for retail development in the Site Allocations Plan:

- Jarman Fields, Hemel Hempstead (see response to Questions 7(b) and 9 and to Matter 15 for further information on this site).

8.3 Potential new sites were also examined in the Background Issues Paper. It was concluded that the following sites should be shown in the Site Allocations Plan 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.
- Gossoms End/Billet Lane in Berkhamsted.

8.4 The above sites are included in the Site Allocations as sites MU/1 and MU/7 (see the Schedule of Mixed Use Proposals and Sites, and the Schedule of Retail Proposals and Sites). Planning permission has already been granted for a Lidl foodstore on the Berkhamsted site.

(b) Is there evidence that this is the appropriate amount for Dacorum?

8.5 Core Strategy Policy CS16: Shops and Commerce provides quantitative guidance on retail floorspace growth over the 2009-2031 period. However, as explained in paragraph 7.5 above, 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. Indeed, the policy states that '*Opportunities will be given to provide capacity*' for the specified levels of floorspace '*if there is demand.*'

8.6 Paragraphs 6.26-6.41 in the Authority Monitoring Report 2014/2015 (AMR) (Examination Document BP1) provide monitoring information on Policy CS16. The AMR's information on retail commitments relates to gross floorspace,

although Policy CS16 refers to sq. metres (net) figures. This is not a serious problem, given the relatively low level of commitments.

8.7 Paragraph 6.41 in the AMR concluded that some of the Policy CS16 monitoring targets are unlikely to be met:

- Hemel Hempstead town centre: if a supermarket is built it will be relatively small, whilst any increase in comparison floorspace is likely to be well below the Policy CS16 figures.
- Berkhamsted town centre: any increase in comparison floorspace is likely to be below the Policy CS16 figure.
- Outside of designated centres: a substantial net floorspace gain is expected, contrary to the monitoring target of nil net gain.

8.8 Since the AMR was compiled, planning permission has been granted for the revised Jarman Fields scheme and the Aviva scheme (see the response to Matter 7(b) above). These permissions increase the net floorspace gain expected outside designated sites to around 35,000 sq. metres.

8.9 Paragraphs 2.69-2.75 in the Strengthening Economic Prosperity Background Issues Paper (Examination Document SA1) recognise that the proposed retail allocations in the Site Allocations will be insufficient to meet the Policy CS16 retail floorspace monitoring targets. Paragraph 2.69 states that in order to meet the targets in full, 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.

8.10 The Background Issues Paper then considers other factors, in particular the low demand for additional retail floorspace until recently, the lack of a major site for comparison shopping development in Hemel Hempstead town centre and the scale of retail development permitted in out-of-centre locations. Paragraph 2.74 of the document concludes that there was no need for additional shopping allocations in the Site Allocations Plan over and above that proposed.

9. Is the proposed amount location and distribution of additional retail consistent with the CS and the Framework?

9.1 The response to Question 8(b) above examines whether the amount of additional retail development proposed in the Plan is consistent with the Core Strategy. Therefore, with regard to the Core Strategy, the Council's response to Question 9 concentrates on the location and distribution of additional retail development.

9.2 Core Strategy Policy CS16: Shops and Commerce seeks to strengthen the main retail hierarchy of town and local centres (listed in Table 5 of the Core Strategy)

and direct most retail development to these centres. Hemel Hempstead will be the main destination for comparison goods shopping, with other centres meeting more local needs. Policy CS33: Hemel Hempstead Town Centre provides more detailed guidance on this specific centre. Guiding principle 1(a) in this policy aims to secure additional retail stores in the Marlowes Shopping Zone and a new food store.

9.3 Paragraph 23 in the National Planning Policy Framework (NPPF) provides guidance on local plan policies for the management and growth of centres. Bullet points 6-8 in this paragraph are particularly relevant:

- Bullet 6: the needs for main town centre uses including retail should be met in full and the need to expand town centres should be assessed.
- Bullet 7: priority should be given to town centre sites, followed by edge of centre sites, followed by other accessible locations well connected to the town centre.
- Bullet 8: policies should be set for main town centre uses that cannot be accommodated in or adjacent to town centres.

9.4 An assessment of the three retail allocations in the Plan (see paragraphs 8.2 and 8.3 above) against the Core Strategy and the NPPF is given below. This assessment takes account of paragraphs 2.60-2.68 in the Strengthening Economic Prosperity Background Issues Paper January 2016 (Examination Document SA1).

Location	Assessment against the Core Strategy and NPPF
Jarman Fields, Hemel Hempstead	<p>This is an out of centre site. However, it was allocated for mixed use development including shopping in the Local Plan (Site 3 in the Schedule of Shopping Proposal Sites). Planning permission was granted previously for retail warehousing and has recently been granted on appeal for 10,300 m² of retail floorspace.</p> <p>Other relevant factors are:</p> <ul style="list-style-type: none"> • Jarman Fields is already a well-established out of centre and retail and leisure location. • Jarman Fields is reasonably accessible to the town centre. • There are no suitable and available town centre or edge of centre sites except the College/Civic Zone site (see below). <p><i>Conclusion:</i> a retail allocation is justified despite the out of centre location.</p>
West Herts College site and Civic Zone, Queensway/Marlowes/Combe Street (north) /	<p>This is an edge of centre site in terms of the definition in NPPF Annex 2. Core Strategy Policy 33 proposes a new town centre foodstore, whilst the Town Centre Masterplan indicates that it should be located on the</p>

<p>Leighton Buzzard Road, Hemel Hempstead</p>	<p>College/Civic Zone site.</p> <p><i>Conclusion:</i> the site is well located for retail development in terms of the Core Strategy and the NPPF.</p>
<p>Gossoms End/Billet Lane, Berkhamsted</p>	<p>This is an out of centre site. However, planning permission has been granted for a foodstore on the site. The Council approved this application for a number of reasons including:</p> <ul style="list-style-type: none"> • There were no suitable and available town centre or edge of centre sites. • The development would not have a significant adverse impact on Berkhamsted town centre. <p>In addition, the site is well connected to the town centre.</p> <p><i>Conclusion:</i> a retail allocation is justified despite the out of centre location.</p>

Employment Land Safeguarding Policies

Policy	Key points
Local Plan Policy 31 (General Employment Areas)	<p>Sentence 1 states that: <i>“Development and redevelopment will be permitted in General Employment Areas for the range of employment generating uses set out in the table below.”</i></p> <p>The table in the policy proposes a range of B-class uses in the GEAs:</p> <ul style="list-style-type: none"> • Business • Business (core office location) • Industry • Storage and distribution • Oil terminal <p>‘Other uses’ in paragraph 3, sentence 1 of the policy means B-class uses other than business use. Policy 31 does not mention the possibility of non B-class uses being permitted.</p> <p>Policy 31 also contains cross references to the Schedule of Employment Proposal Sites.</p>
Local Plan Policy 32 (Employment Areas in the Green Belt)	<p>Employment generating uses will be retained in the employment areas in the Green Belt. The table in the policy states that the proposed employment generating uses are industry and storage and distribution.</p> <p>Note: It is intended that this policy will be superseded by Site Allocations Policy SA6 (see below).</p>
Core Strategy Policy CS4 (The Towns and Large Villages)	<p>Appropriate employment generating development is encouraged in GEAs.</p> <p>In town and local centres a mix of uses is sought. Business uses, including offices, are amongst the uses encouraged in these centres.</p>
Core Strategy Policy CS14 (Economic Development)	<p>Most employment generating development will be located in town and local centres and GEAs in accordance with Policies CS1 and CS4. Hemel Hempstead will be the main focus for new economic development uses, which will be used to support the regeneration of the Maylands Business Park and Hemel Hempstead town centre (see Policies CS33 and CS34 for further guidance on these areas).</p>
Core Strategy Policy CS15 (Offices, Research, Industry, Storage and Distribution)	<p>A minimum area of land will be identified and retained for B class uses. It comprises:</p> <ul style="list-style-type: none"> • GEAs

	<ul style="list-style-type: none"> • Employment proposal sites • Land in town and local centres; and employment areas in the Green Belt <p>GEAs will be protected for B-class use.</p> <p>New office uses will be directed to core office locations and Hemel Hempstead town centre.</p>
<p>Site Allocations Policy SA5 (General Employment Areas)</p>	<p>Within GEAs development and redevelopment will be permitted for the range of employment generating uses set out in the table in the policy. The uses referred to in the table are B1, B1(c), B2 and B8.</p> <p>The policy also contains a cross reference to the Schedule of Employment Proposals and Sites.</p>
<p>Site Allocations Policy SA6 (employment areas in the Green Belt)</p>	<p>Within the employment areas in the Green Belt, the range of employment generating uses set out in the table in the policy will be retained. The uses referred to in the table are B1, B2 and B8.</p>