



Employment Development Background Topic Paper

Dacorum Local Plan (2020-2038)
Emerging Strategy for Growth
November 2020

Background Topic Papers

Introduction

A series of background topic papers have been prepared to support the Dacorum Local Plan (2020 - 2038) Emerging Strategy for Growth. These are as follows:

- **Climate Change and Sustainability**
- **The Development Strategy**
- **Housing**
- **Site Selection**
- **The Green Belt & Rural Area Background Topic Paper**
- **Employment**
- **Retail and Town Centres**
- **Transport and Connectivity**
- **Open Space, Sport and Leisure**
- **Chilterns Beechwoods SAC**

These topic papers have been produced to present a coordinated view of the evidence that has been considered in drafting the Local Plan Emerging Strategy for Growth. These papers form part of the evidence base. It is intended that these papers will make it easier to understand how the Council has reached conclusions on specific matters.

Their role is to inform the content of the Local Plan Emerging Strategy for Growth through:

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

Contents

1.	Introduction	5
2.	Planning policy context	6
3.	Evidence base	15
4.	Consultation and engagement	21
5.	Key issues	28
6.	Conclusions	50

Appendices

Appendix 1: Dacorum's existing employment policies	54
Appendix 2: Summary of response to Issues and Options consultation document	58
Appendix 3: Meeting with Dacorum's Economic Development and Infrastructure team	76
Appendix 4: Dacorum employment land supply commitments on major sites	79
Appendix 5: Further potential for gains and losses of employment floorspace on sites consistent with existing policy	86
Appendix 6: Review of general employment areas and other land designated for employment use	98
Appendix 7: Assessment of potential new greenfield employment sites	155

1. INTRODUCTION

- 1.1 The Borough of Dacorum is facing challenging pressures for new development over the next 18 years which it must tackle through its Local Plan. In particular, the need for homes, employment land and associated infrastructure is much higher than faced by previous Plans yet this has to be planned for in the context of the same extensive planning and environmental constraints. Thus the Plan must demonstrate how it has taken into account the many constraints and opportunities of the Borough.
- 1.2 This topic paper provides a summary of how the employment policies for the Local Plan Emerging Strategy for Growth have emerged and what has influenced them. It explains what the Plan took into account in developing the approach and how it has narrowed down reasonable policy options, identified Plan allocations, and highlighted changes to the Policies Map in terms of its:
- evidence base;
 - feedback from the Issues and Options consultation; and
 - ongoing engagement with key stakeholders and meeting its obligations under the Duty to Co-operate.
- 1.3 Future employment floorspace needs, particularly for offices, may be affected by the current Covid-19 pandemic. It is not possible to make an accurate forecast at present, but we will give the matter further consideration before publishing the next stage of the Local Plan.
- 1.4 This topic paper is published alongside the Local Plan Emerging Strategy for Growth for consultation. It should be read in conjunction with a series of related and complementary topic papers that explain the Plan's overall policies, visions and objectives.

2. PLANNING POLICY CONTEXT

- 2.1 The preparation of the Local Plan Emerging Strategy for Growth, particularly in developing a spatial strategy for the Borough, has been influenced by a broad national, strategic and local policy context and strategies.

(a) National Planning Policy Framework

- 2.2 National advice on housing is provided through the National Planning Policy Framework (NPPF) and the further guidance in the Government's Planning Practice Guidance (PPG). Elements of the NPPF that influence preparing the Local Plan's policies on economic development are summarised below.
- 2.3 NPPF paragraph 8 sets out three overarching objectives contributing to sustainable development: building a strong, responsive and competitive economy, supporting strong, vibrant and healthy communities and protecting and enhancing the environment. The wording of the economic development objective is as follows:

*“a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure”*

- 2.4 Section 6 in the NPPF provides guidance on 'Building a strong, competitive economy'. The main guidance is contained in paragraphs 80-82:

“80. Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation⁴⁰, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.

81. Planning policies should:

a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;

b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;

c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and

d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.

82. Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.”

2.5 NPPF paragraphs 83 and 84 give guidance on supporting a prosperous rural economy. In particular, paragraph 83 advises that planning policies and decisions should enable the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;

2.6 When local plans are examined, they are assessed against the legal and procedural requirements, and must satisfy the tests of “soundness” (paragraph 35). Plans are ‘sound’ if they are:

a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs¹⁹; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

(b) Planning Practice Guidance

2.7 Further national guidance is provided through the Planning Practice Guidance (PPG). Relevant guidance is contained in the PPGs on ‘Housing and economic land availability assessment’ and ‘Housing and economic needs assessment’.

PPG on housing and economic land availability

2.8 Paragraph 001 in the PPG explains the purpose of the assessment of land availability, including the following:

“An assessment of land availability identifies a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period. The assessment is an important source of evidence to inform plan-making and decision-taking...”

However, the assessment does not in itself determine whether a site should be allocated for development. It is the role of the assessment to provide information on the range of sites which are available to meet the local authority's...requirements, but it is for the development plan itself to determine which of those sites are the most suitable to meet those requirements...

An assessment should:

- *identify sites and broad locations with potential for development;*
- *assess their development potential; and*
- *assess their suitability for development and the likelihood of development coming forward (the availability and achievability)."*

2.9 This PPG indicates what inputs and processes can lead to a robust assessment of land availability. Plan-making bodies are expected to have regard to this guidance in preparing and updating their assessments.

2.10 Stage 1 of the method (paragraphs 006-015) involves the Identification of sites and broad locations. Key points are noted below:

- The assessment needs to identify all sites and broad locations (regardless of the amount of development needed) in order to provide a complete audit of available land. The process of the assessment will, however, provide the information to enable an identification of sites and locations that are most suitable for the level of development required (paragraph 008).
- It may be appropriate to consider all sites and broad locations capable of delivering 0.25 hectares (or 500 square metres of floor space) and above (paragraph 009).
- Plan-makers need to be proactive in identifying as wide a range of sites and broad locations for development as possible (including those existing sites that could be improved, intensified or changed). Identified sites, which have particular constraints (such as Green Belt), need to be included in the assessment for the sake of comprehensiveness but these constraints need to be set out clearly, including where they severely restrict development. An important part of the desktop review, however, is to identify sites and their constraints, rather than simply to rule out sites outright which are known to have constraints (paragraph 010).

It is important that plan-makers do not simply rely on sites that they have been informed about, but actively identify sites through the desktop review process that may assist in meeting the development needs of an area (paragraph 010).

2.11 Stage 2 of the method (paragraphs 016-022) is concerned with estimating the development potential of each site/broad location. In particular, paragraph 017 states that Plan-makers will need to assess the suitability, availability and achievability of sites, including whether the site is economically viable. This will provide information on which a judgement can be made as to whether a site

can be considered deliverable within the next five years, or developable over a longer period.

2.12 The PPG concludes in paragraph 026, by stating that:

“The following set of standard outputs are expected to be produced following the assessment:

- *a list of all sites or broad locations considered, cross-referenced to their locations on maps;*
- *an assessment of each site or broad location, including:*
- *where these have been discounted, evidence justifying reasons given;*
- *where these are considered suitable, available and achievable, the potential type and quantity of development, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when;*
- *an indicative trajectory of anticipated development based on the evidence available.”*

PPG on housing and economic needs assessment

2.13 The section of the PPG on economic need (paragraphs 025-032) starts by stating that strategic policy-making authorities will need to prepare a robust evidence base to understand existing business needs, which will need to be kept under review to reflect local circumstances and market conditions. Paragraph 026 then indicates that authorities will need to assess:

- the best fit functional economic market area;
- the existing stock of land for employment uses within the area;
- the recent pattern of employment land supply and loss – for example based on extant planning permissions and planning applications (or losses to permitted development);
- evidence of market demand (including the locational and premises requirements of particular types of business) – sourced from local data and market intelligence, such as recent surveys of business needs, discussions with developers and property agents and engagement with business and economic forums;
- wider market signals relating to economic growth, diversification and innovation; and

- any evidence of market failure – such as physical or ownership constraints that prevent the employment site being used effectively.

2.14 The PPG also addresses the following questions:

- How can market signals be used to forecast future need?
- How can strategic policy making authorities identify the existing stock of employment land and identify the recent pattern of supply and loss?
- How can current market demand be analysed?
- How can employment land requirements be derived?
- How can authorities assess need and allocate space for logistics?
- How can the specific locational requirements of specialist or new sectors be addressed?

(c) Use Classes Order and General Permitted Development Order

2.15 The policies on employment development in the new Local Plan must take account of the Government's Use Classes Order and General Permitted Development Order.

2.16 Until recently, office, industrial and warehousing development was covered in the Use Classes Order by Use Class B, which was sub-divided as follows:

B1: Business Use
 B1(a): offices
 B1(b): research and development
 B1(c): light industrial

B2: general industrial

B8: storage or distribution

2.17 The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 made significant changes to the Use Classes Order from 1 September 2020. These changes included the introduction of new Class E (commercial, business and service). Class E incorporates the old Class B1 and a range of other uses, such as shops, restaurants and financial and professional services. Use Classes B2 and B8 remain unaltered.

2.18 In 2013 and more recently, the Government has introduced permitted development rights under the General Permitted Development Order, to encourage the creation of new housing by changes of use of employment buildings to housing. The permitted development rights mean that planning permission is granted for changes of use to housing from offices and some light

industrial and warehousing buildings, subject only to 'prior approval' of some detailed matters.

(d) South West Hertfordshire Joint Strategic Plan (JSP)

2.19 Dacorum has a substantial history of co-ordinated working on planning issues and its evidence base, with adjoining districts. It has agreed with St Albans, Three Rivers, Watford and Hertsmere Councils and Hertfordshire County Council to prepare a place growth and development Plan (Joint Strategic Plan) up to 2050 for South West Hertfordshire. This includes a signed Memorandum of Understanding between the partners. They have also secured planning delivery funding from the Ministry of Housing, Communities and Local Government to deliver the JSP.

2.20 Given the time horizon of the JSP, it has not influenced how the Council prepared the development strategy in the Local Plan Emerging Strategy for Growth.

(e) Local Plan Context

2.21 The following Plan documents will be replaced by the new Local Plan:

- Dacorum Core Strategy (adopted September 2013);
- Dacorum Site Allocations Development Plan Document (adopted July 2017); and
- Dacorum Borough Local Plan 1991-2011 (adopted April 2004) (saved policies);

2.22 There is only one "made" Neighbourhood Plan (covering the neighbourhood of Grovehill in Hemel Hempstead). Two other plans are being prepared, for Bovingdon and Kings Langley.

2.23 Key existing policies on economic development are summarised below and a more detailed summary and also information on other relevant documents can be found at Appendix 1.

Dacorum Core Strategy

2.24 This document contains the Council's strategic policy framework. Policy NP1 sets out the NPPF national presumption in favour of sustainable development and positive approach to development.

2.25 Policies relating to providing for offices, industry, storage and distribution are:

- CS14: Economic Development
- CS15: Offices, Research, Industry, Storage and Distribution

2.26 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.

2.27 Policy CS15 states that a minimum area of land will be identified and retained for B-class uses. 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.

2.28 Other relevant Core Strategy policies include Policy NP1: Supporting Development, CS1: Distribution of Development, CS2: Selection of Development Sites, CS4: The Towns and Large Villages, CS33: Hemel Hempstead Town Centre and CS34: Maylands Business Park.

Dacorum Site Allocations Development Plan Document

2.29 The Site Allocations document provides more detailed site specific policies and proposals than those in the Core Strategy. All of Dacorum is covered in the Site Allocations except for east Hemel Hempstead, including the Maylands Business Park.

2.30 The following policies provide guidance on the main employment areas:

- Policy SA5: General Employment Areas (GEAs)
- Policy SA6: Employment areas in the Green Belt.

The 'Schedule of Employment Proposals and Sites' proposes employment development on two sites.

Dacorum Borough Local Plan 1991-2011

2.31 The main 'saved' (i.e. still operational) policy from this Plan is Policy 31 (General Employment Areas). This policy provides similar guidance to Site Allocations Policy SA5, but is operational only in respect of the GEAs in east Hemel Hempstead (Buncefield/Maylands area). The Plan's Employment section also contains a 'Schedule of Employment Proposal Sites'. Again, only sites in the Maylands area are still relevant.

(f) Issues and Options Consultation: Local Plan to 2036 (November 2017)

2.32 The new Local Plan Issues and Options document¹ was published by the Council for consultation purposes in November 2017. Chapter 7 of the consultation document considered 'our economy' and posed three questions. Information on these questions and the response to them can be found in chapter 4 of the topic paper.

¹ <http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/new-single-local-plan>

2.33 The consultation document was accompanied by a Schedule of Site Appraisals – October 2017². This document undertook a simple appraisal of a number of greenfield housing sites that had been promoted to the Council leading up to the consultation. It did not make any formal decisions on their suitability to be taken forward. The consultation also included a Call for Sites exercise which provided a further opportunity for landowners to promote their sites for housing and other development.

2.34 Both the consultation document and the Schedule of Site Appraisals were subject to separate Sustainability Appraisals^{3 4}.

(g) Other Local Strategies and Guidance

2.35 The Council has produced the following local strategies and guidance relevant to planning for employment land:

- Maylands Masterplan (2007)
- Heart of Maylands Development Brief (2010)
- Maylands Gateway Development Brief (2013)
- Hemel Hempstead Town Centre Masterplan 2011-2031 (2013)

Information on these documents can be found in Appendix 1.

2.36 In addition, the Council has produced an **Enterprise and Investment Action Plan 2017-2020**. It sets out actions and initiatives, with the aim of providing an environment in which businesses can flourish. The action plan seeks to foster a reputation for the Borough being open for business and thus attracting businesses to the area.

Employment Article 4 areas (2020)

2.37 As stated in paragraph 2.18 above, planning permission is now granted for changes of use from offices and some light industrial and warehousing buildings to housing, subject only to 'prior approval' of some detailed matters.

2.38 In 2018, the Council calculated that prior approval schemes completed or approved under the new rules were likely to result in the loss up to 3,000 office jobs in Dacorum. Most job losses were occurring in our main employment areas, including Maylands Business Park and Hemel Hempstead town centre. The Council was concerned about the impact on retaining existing businesses and jobs, attracting new businesses and jobs, and providing services locally for Dacorum's residents, workers and visitors.

² http://www.dacorum.gov.uk/docs/default-source/strategic-planning/schedule-of-site-appraisals-draft---october-2017.pdf?sfvrsn=85af339e_8

³ http://www.dacorum.gov.uk/docs/default-source/strategic-planning/dacorum-issues-and-options-sa-working-note---october-2017.pdf?sfvrsn=66ad339e_4

⁴ http://www.dacorum.gov.uk/docs/default-source/strategic-planning/dacorum-schedule-of-site-appraisals-sa-working-note---october-2017.pdf?sfvrsn=2ad339e_4

2.39 Therefore, the Council reintroduced the need for planning permission in key employment areas for such changes of use by designating the following locations as Article 4 areas:

- Maylands Business Park
- Doolittle Meadows, Apsley, Hemel Hempstead
- Whiteleaf Road, Hemel Hempstead
- Park Lane, Hemel Hempstead
- Bourne End Mills, Bourne End
- Northbridge Road and River Park, Berkhamsted
- Icknield Way, Tring.

2.40 The Article 4 areas became operational in January 2020 and further information is available on the Council's website⁵.

⁵ <http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/article-4-directions-employment-areas>

3.0 EVIDENCE BASE

3.1 The Local Plan's policies on employment development have been developed in the light of a number of key evidence base studies which are summarised below.

(a) Dacorum's Monitoring System

3.2 The Council has a well-developed monitoring system which the County Council helps support. This allows us to carry out regular monitoring of land development and publish annual land position statements and Borough wide monitoring reports⁶.

3.3 We publish an annual land position statement for both housing and employment, using a base date of 1 April. They provide a simple "snap shot" of the supply of planning permissions for development and their progress to date. The latest published employment position statement is for 1 April 2019.

3.4 The Council also prepares on an annual basis its Authority Monitoring Report (AMR). The AMR uses information from the land position statements and other sources to provide a more detailed overview of the success of Local Plan policies and the progress of new development. Due to the need to progress the draft Local Plan in recent years, the latest published AMR covers the period 2016/17. Therefore, this topic paper relies on more recent monitoring information.

(b) Main Evidence Base Studies

3.5 The main evidence base for the Council's economic development policies in this Plan consists of the following studies:

- **South West Hertfordshire Economic Study (Regeneris Consulting and GL Hearn, 2016):** this study provided a comprehensive economic baseline and growth scenarios for South West Hertfordshire (Dacorum, Hertsmere, St Albans, Three Rivers and Watford districts). It also considered employment land and floorspace requirements to 2036, and contained a high level review of some existing and potential future employment areas.
- **Dacorum Employment Land Availability Assessment (Peter Brett Associates, 2017):** this assessment gave further advice on the quantity, mix and geographical spread of employment land in Dacorum.
- **South West Hertfordshire Economic Study Update (Hatch Regeneris, 2019):** this report updated the 2016 Economic Study and provided a revised assessment of employment land needs in South West Herts to

⁶ <http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/monitoring-reports-and-land-position-statements>

2036. It also contained a more comprehensive and detailed assessment of current and future employment land supply.

3.6 Finally, the Hertfordshire Local Enterprise Partnership (LEP) is responsible for a number of important initiatives and reports:

- **Hertfordshire Strategic Economic Plan (2017):** this document's vision is that by 2030, Hertfordshire will be among the UK's leading economies. South West Hertfordshire is in the M1/West Coast Mainline growth corridor, linking London with the high growth towns of Luton and Milton Keynes.
- **Loss of Employment Space in Hertfordshire (2019):** this study showed that almost a quarter of the County's office stock and 7% of industrial floorspace was lost between 2008 and 2018. Nevertheless, there was a healthy underlying demand in both sectors, but a severe lack of supply to meet these demands.
- **Hertfordshire Local Industrial Strategy (draft 2019):** the finalised strategy will represent a refinement of the Strategic Economic Plan. Issues identified in the draft strategy include the need to improve the A414 corridor (the focus for much of the County's planned growth) and for space to grow. In particular, affordable 'grow on' space is in very short supply.
- **Hertfordshire Innovation Quarter Enterprise Zone (Hertfordshire IQ):** the Enterprise Zone is being developed by a partnership team led by the LEP. Hertfordshire IQ aims to attract green technology businesses. The multi-site zone includes part of Maylands Business Park and the proposed East Hemel Hempstead employment site in St Albans District.
- **Hertfordshire Key Employment Sites, Strategy & Action Plan (2020)⁷:** this study briefly reviews the 17 key sites identified (including Maylands Business Park) and suggests possible interventions. The recommendation is for the report to be consulted on with the districts and other stakeholders, with a view to confirming the broad strategy and agreeing a more detailed action plan.

(c) Evidence Base – Key Messages

3.7 All the above evidence base studies are relevant, but the 2019 Economic Study Update now forms the principal element of the economic development evidence base. Therefore, the key messages set out below are all derived from the Economic Study Update except where stated.

3.8 **Functional Economic Market Area (FEMA):** the 2016 Economic Study identified a FEMA covering the whole of South West Hertfordshire (Dacorum, Hertsmere, St Albans, Three Rivers and Watford districts). This was based on evidence of strong commuting and migration relationships and shared leisure,

⁷ <https://www.hertfordshirelep.com/key-documents/>

retail and public sector catchment areas. The Economic Study Update concluded that the definition of the FEMA was still valid.

- 3.9 Relationship with neighbouring areas: South West Hertfordshire also shares strong relationships with other areas, particularly London and Luton/Central Bedfordshire. Longer term, the Cambridge-Milton Keynes-Oxford growth corridor is also likely to exert a growing influence on the FEMA.
- 3.10 Dacorum – recent economic performance: good road connectivity has made the Borough (particularly Maylands Business Park) highly attractive for large companies serving major population centres in the South East and East of England. There are large concentrations of manufacturing and distribution activity, with firms including Amazon, Next, Kodak and UTC Aerospace Systems. The Borough also has many jobs in computer related activities.
- 3.11 Dacorum has had less success in growing high value office-based sectors, mainly due to poor public transport access.
- 3.12 **Supporting the growth of established sectors is key to addressing productivity challenges:** South West Hertfordshire has experienced strong jobs growth, but its productivity has fallen below the UK average. Established strengths are in professional services, ICT and film and TV production. These high value sectors have significant potential for further growth and should be the main focus for South West Hertfordshire. Science-based industries, a relatively small sector, should also be supported. South West Hertfordshire has a many skilled workers, but the shortage of high quality business premises is a barrier to growth.
- 3.13 **Supply of employment space is at critically low levels:** growing demand and the loss of existing premises has resulted in a shortage of employment space in South West Hertfordshire. The availability of space is now at critically low levels in several key locations (e.g. industrial space in Dacorum). This could place a significant constraint on growth, particularly in those office-based sectors key to increasing productivity.
- 3.14 Changed permitted development rights have contributed to the loss of offices. Vacancy rates are now so low that any further losses are likely to result in the displacement of jobs and businesses. Therefore, the South West Hertfordshire authorities should resist pressure for further changes of use in key employment areas and explore the potential for Article 4 directions in the most at-risk locations.
- 3.15 The Dacorum Employment Land Availability Assessment states that office floorspace has fallen in the Borough's town centres and that there was no justification for any further losses. Indeed, the concern is that further losses in Hemel Hempstead town centre will force some local businesses to relocate out of the town.
- 3.16 The Land Availability Assessment also advised that existing designated employment sites should be protected. A criteria-based policy approach was

recommended, to decide whether non-designated employment sites should be released for other uses. Some of these sites provide lower cost accommodation for economically important uses such as older 'yardage' space that is difficult to replace.

- 3.17 **Key requirements for new employment development:** high value office occupiers require high quality amenities, fast connections to London and good public transport access. Speculative office development is once again viable on well-located sites in Watford. However, the investment required to improve connections to Maylands Business Park means that further large scale growth in high value offices there is unlikely.
- 3.18 In the industrial market, access to the strategic road network is the key requirement of large and medium sized industrial occupiers. Maylands Business Park dominates the market for strategic warehouses and also experiences strong demand for medium sized units. Smaller occupiers are more flexible and look for sites with affordable rents, flexible leases and sites that allow them to serve local markets. There is a severe shortage of these types of sites throughout South West Herts.
- 3.19 Enterprise Zone status, including part of Maylands, may attract investment from a wider range of high value sectors linked to environmental technologies, such as off-site construction, 'agritech' and digital industries.
- 3.20 **South West Herts employment floorspace growth 2018-2036:** the Economic Study Update considered a range of scenarios to arrive at an objective assessment of need for 'offices' and 'industrial' space as defined below:
- Offices (use classes B1(a) offices and B1(b) research and development).
 - Industrial (use classes B1(c) light industry, B2 general industry (B2) and B8 storage and distribution).
- 3.21 It was concluded that the South West Hertfordshire authorities should aim to provide 188,000 sq m of additional office space between 2018 and 2036. This is consistent with past trends, would deliver an aspirational level of growth for South West Herts and would provide high quality job opportunities for its growing workforce.
- 3.22 The study's conclusions on industrial space (481,500 sq m additional floorspace 2018- 2036) reflect past trends in South West Hertfordshire. Floorspace growth can be sub-divided between B1c/B2 space (152,000 sq m) and B8 space (329,500 sq m). This high growth is justified by the consistently strong demand in South West Hertfordshire, which is likely to be sustained by the growth of online shopping.
- 3.23 **Indicative district-level floorspace distribution:** the Economic Study Update included a possible floorspace breakdown to the districts, to inform local plan preparation. Forecasting demand at district level is very uncertain, so the indicative floorspace distribution shown below is only a guide. Decisions on floorspace and land requirements in local plans should be informed also by duty

to co-operate discussions, which take account of land availability for new development across the FEMA.

Indicative distribution of employment floorspace 2018-2036 (sq m)		
	Offices	Industrial
Dacorum	45,100	196,500
Hertsmere	35,700	81,900
St Albans	39,500	75,900
Three Rivers	30,100	28,800
Watford	37,600	98,400
Total	188,000	481,500

- 3.24 The indicative floorspace figures were apportioned to districts based on the share of occupied floorspace in each district in 2018. This explains why Dacorum has the highest figures, both for office and industrial floorspace growth. Indeed, Dacorum's industrial figure is nearly twice that of any other South West Hertfordshire district.
- 3.25 **Demand and supply balance - Offices:** across South West Hertfordshire, land supply for offices exceeds the recommended 2018-2036 floorspace growth by 76,000 sq m. However, Dacorum has an estimated shortfall of over 68,000 sq m (calculated by adding the indicative floorspace requirement (45,100 sq m) to the existing land supply (net loss of 23,200 sq m)).
- 3.26 The overall surplus in South West Hertfordshire arises partly from an oversupply in Watford and Three Rivers, and partly from the East Hemel Hempstead site in St Albans District which has capacity for around 136,000 sq m of offices. Although office development is likely at East Hemel Hempstead, there is significant uncertainty about the timing and scale of development.
- 3.27 Watford and Three Rivers' oversupply could be used to address shortfalls elsewhere, if agreed through duty to cooperate discussions. However, this will only meet footloose demand and all authorities should aim to have a supply to support local businesses.
- 3.28 **The South West Hertfordshire authorities should undertake further work to identify potential reserve sites for 10 ha of office development:** given the demand and supply balance for offices, there is currently no need to allocate additional office development sites. However, the South West Hertfordshire authorities should undertake further work to identify potential reserve sites suitable for strategic office development, should delivery issues arise at East Hemel Hempstead. 10 ha of land should be identified, ideally located close to a train station offering fast journey times to London.
- 3.29 **Demand and supply balance - Industrial:** South West Hertfordshire has a shortfall of over 211,000 sq m of industrial space. Dacorum has the largest shortfall of 120,000 sq m (calculated by subtracting the existing land supply (196,500 sq m) from the indicative floorspace requirement (45,100 sq m). However, St Albans District has a surplus of 80,000 sq m, as the East Hemel Hempstead site has capacity for 152,000 sq m of industrial development.

- 3.30 **There is a need for 53 ha of additional land for industrial development:** the 211,000 sq m shortfall across South West Hertfordshire equates roughly to 53 ha of land.
- 3.31 Additional strategic industrial development sites with good access to the strategic road network are needed. The Economic Study Update identified some possible sites, but there has been no comprehensive assessment of potential sites. Also, the deliverability of large scale industrial development at these sites is uncertain and they are in Green Belt locations. Therefore, the authorities should undertake technical work to identify sites to meet the identified demand.
- 3.32 There is also a lack of land for small scale industrial uses in Dacorum, Watford and Three Rivers. These authorities may wish to allocate additional sites to meet this need. Sites which may be suitable include the following Green Belt sites in Dacorum:
- Dunsley Farm, Tring
 - Land east of A41, Hemel Hempstead
 - Bovingdon Brickworks
 - Adjacent to A41 service area, Stoney Lane, Bourne End
- 3.33 **Employment growth in the Preferred Scenario:** the NPPF and PPG do not require local plans to set a jobs growth target, but local plans should aim to deliver balanced housing and employment growth.
- 3.34 The indicative floorspace figures in the Economic Study Update could support around 21,000 jobs, but only 41% of jobs currently require B class space. The preferred scenario makes no job assumptions for the 59% of jobs which do not require B class space, so total jobs growth cannot be estimated.
- 3.35 Given the complex relationship between housing and jobs growth and the uncertainty over total jobs growth, the South West Hertfordshire authorities should not set jobs growth targets in their local plans. It is better to concentrate on planning for appropriate increases in office and industrial floorspace, which are more tangible and easier to monitor.

4. CONSULTATION AND ENGAGEMENT

4.1 This chapter explains what consultation and engagement the Council has undertaken and the responses it has received at each stage.

(a) Dacorum Local Plan: Issues and Options Consultation (Regulation 18) (November 2017)

4.2 The Council undertook an Issues and Options consultation during November-December 2017, to help inform and develop the Local Plan. In order to secure more meaningful responses the consultation document presented a full and detailed set of policy options, particularly in respect of housing growth and distribution.

4.3 22,708 responses to the 46 questions in the Issues and Options consultation document were submitted by 2,376 individuals and organisations. A full summary of the consultation material and the responses are available from the Council's website⁸.

4.4 This section of the topic paper provides a brief summary of the main issues raised in response to the questions in the consultation document on employment development. A more detailed summary of the responses to these questions is provided in Appendix 2.

How should our local economy be defined?

4.5 Section 7.1 in the consultation document considered how the local economic area should be defined? It explained that the Government requires councils to assess the future quantity of land or floorspace required for offices, industry and warehousing for our Local Plans. This must be done on the geography of 'Functional Economic Market Areas' (FEMAs). Such areas are defined largely by analysing data on travel to work and migration. Connections with London are also important, as many residents commute to the capital.

4.6 As stated in paragraph 3.8 above, the South West Hertfordshire Economic Study (2016) defined a South West Hertfordshire FEMA covering the following council areas:

- Dacorum
- Hertsmere
- St Albans
- Three Rivers
- Watford

4.7 Views on the above were sought through the following question:

⁸ <http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/new-single-local-plan>

Question 20: Do you agree with the definition of the Functional Economic Market Area in the South West Hertfordshire Economic Study?

4.8 There were 261 responses to Question 20. 64% of respondents answered 'yes' and 36% 'no'. The response to this question is summarised in Appendix 2. There was broad support for the FEMA as defined, but some respondents considered that:

- St Albans should not be in the FEMA.
- The FEMA is too narrowly defined given the close economic links with London, Buckinghamshire and Bedfordshire.

4.9 Although the South West Hertfordshire Economic Study recognised that there are close relationships between the South West Hertfordshire authorities and the above areas, it did not recommend that any of them should be included in the same FEMA. This reflects the analysis in chapter 2 of the study, which is reinforced by paragraphs 3.3-3.18 in the 2019 Economic Study Update.

4.10 The following points from the 2016 Economic Study are particularly important in relation to Question 20:

- St Albans: paragraphs 2.57-2.60 explained why there is a very strong case for including St Albans in the FEMA.
- London: chapter 2 contains several mentions of the close relationship between South West Hertfordshire and London. However, paragraphs 2.14 and 2.57 (bullet 2) concluded that including London in the FEMA would result in a very large area which is not practical for the purpose of planning.
- Bedfordshire: paragraph 2.15 states that there are strong grounds for excluding Luton and Central Bedfordshire from the South West Hertfordshire FEMA. Bullet point 4 in paragraph 2.59 is also relevant.
- Buckinghamshire: paragraph 2.7, bullet 4 states that Aylesbury Vale, Chiltern, South Buckinghamshire and Wycombe Districts (now covered by Buckinghamshire Council) form the Central Bedfordshire FEMA. Also, paragraph 2.57, bullet 3 indicates that connections westwards, for example to Chiltern District, are relatively limited and the Central Buckinghamshire FEMA does not look east to Hertfordshire.

4.11 It should also be noted that St Albans City and District Council opposed its area being included in the South West Hertfordshire FEMA in the 2016 Economic Study, but changed its position when the 2019 Economic Study Update was produced. A key factor behind this change was that St Albans was not a commissioning authority for the 2016 study, but did jointly commission the 2019 study.

4.12 Given the above, Dacorum's conclusion on Question 20 is that the FEMA should remain as proposed in the Economic Studies.

How many new jobs are needed in Dacorum by 2036?

4.13 Section 7.2 in the Issues and Options consultation document considered future job requirements. This section summarised the recommendations in the South West Hertfordshire Economic Study (2016) and the Dacorum Employment Land Availability Assessment (2017) concerning sites. It then stated that the Council's proposed approach, as per the 2017 study, was to plan for office job growth as proposed in the 2016 study, but provide opportunities for a higher level of industrial and warehousing jobs. The proposed approach also placed emphasis on 'enviro-tech' businesses in the newly designated Enterprise Zone, part of which is within the Maylands Business Park.

4.14 Views on the above were sought through the following question:

Question 21: Do you agree with the proposed approach to meeting future jobs growth?

4.15 There were 314 responses to Question 21. 28% of respondents answered 'yes' and 72% 'no'. The response to this question is summarised in Appendix 2. A wide range of views were submitted by Duty to Co-operate partners, local organisations, landowners/developers and other commercial interests, reflecting their different perspectives. However, the general public mainly felt that there was no need for a large increase in jobs, particularly in offices, in view of changing work practices, commuting to London and transport infrastructure concerns.

4.16 The 2019 Economic Study Update proposed considerably less office floorspace growth, but more industrial space growth than the 2016 study (see paragraph 3.23 above). However, the 2019 study concluded (see paragraphs 3.33-3.35 above) that the South West Hertfordshire authorities should not set jobs growth targets in their local plans. Instead, they should concentrate on planning for appropriate increases in office and industrial floorspace.

4.17 The Council agrees with the advice in the 2019 Study. Chapter 5 below considers what floorspace growth should be planned for.

What additional sites should we set aside for office, industrial and warehousing development?

4.18 Section 7.3 in the Issues and Options consultation document assessed potential new sites for office, industrial and warehousing development. The site specific recommendations in the Dacorum Employment Land Availability Assessment (2017) were summarised. The consultation then reached concerning sites. It then stated that the Council's provisional conclusion was to accept the 2017 study's recommendations.

4.19 This would mean removing land from the Green Belt at south west Kings Langley, east of the A41 at Two Waters, and Dunsley Farm in Tring. The Council considered that the need for additional employment land justified such changes to the Green Belt in these areas. A key issue that needed further consideration was the scale and timing of any employment development on the Wayside Farm site in Kings Langley. The Council's initial view was that about 18 hectares of land should be designated as 'safeguarded land' for possible long-term office development.

4.20 Question 22 asked:

Do you agree with the proposed approach to choosing sites to accommodate future jobs growth?

4.21 There were 349 responses to Question 22. 44% of respondents answered 'yes' and 56% 'no'. The response to this question is summarised in Appendix 2. Key points worth noting from the response are as follows:

- Hertfordshire County Council responded as owners of the possible new employment sites at Dunsley Farm in Tring and Wayside Farm, Kings Langley. They consider that offices should be accepted at Dunsley Farm, as well as other types of B class development. Highways issues at M25 Junction 20 and on the A4251 constrained the potential for employment development at Wayside Farm, but further work was required to establish the scope for development.
- St Albans District Council considers that greenfield office development at Kings Langley is hard to justify, even as 'safeguarded land' for the long term. It could undermine the success of the East Hemel Hempstead site (especially the office part) in St Albans District.
- Tring Town Council supported employment development at Dunsley Farm, but considered that the emphasis should be on commercial and light industrial/high tech businesses, rather than industrial and warehousing.
- Other local organisations and the general public were overwhelmingly against new employment sites in the Green Belt. They considered there was no need for new Green Belt sites, as there was capacity in existing vacant employment buildings and brownfield urban sites. There was particularly strong opposition to the Dunsley Farm and Wayside Farm sites. Several reasons against the development of these sites were put forward.

4.22 The site specific recommendations on future employment development in the 2019 Economic Study Update differ in some important respects from the 2016 and 2017 studies. In particular, the 2019 study did not recommend office development on the Wayside Farm site.

4.23 Therefore, further consideration is given to potential new employment sites under Issues 9 and 13 in chapter 5 below and in the more detailed assessments in Appendices 7 and 8. It should, however, be noted here that the Local Plan Emerging Strategy for Growth does not propose employment development at Wayside Farm.

(b) Internal Consultation

4.24 During the preparation of the Local Plan Emerging Strategy for Growth, the Strategic Planning team has worked closely with colleagues across the Council. This provided an opportunity to test evolving approaches to policy. The work has helped to shape and refine the emerging Plan. It has delivered a range of revisions that take into account recommendations and address concerns and issues raised.

4.25 With regard to employment development, liaison has been mainly with officers in the Economic Development and Infrastructure Team, the Strategic Sites team and the Development Management group.

4.26 Of particular importance was the meeting between the Strategic Planning Team and the Economic Development and Infrastructure Team on 30 January 2020. The notes of this meeting are available in Appendix 3. The main points raised by the Economic Development and Infrastructure Team are summarised below:

- There is a need for a lorry park to serve the Maylands Business Park in Hemel Hempstead, which should include provision for vans.
- There is a major shortage of smaller units to facilitate business growth, for example, those wanting to move on from the Council owned Maylands Business Centre and small and medium sized enterprises in general.
- Demand for large office buildings/space is falling as the nature of business changes.
- Vacant office space is beginning to fill up now that owners are being more pragmatic and letting small sections of buildings.
- Saved Local Plan Policy 34 on employment sites outside General Employment Areas is not used and there are few quality units/premises. However, a criteria based policy could be considered to protect better quality units.
- There is a need to reflect the National Planning Policy Framework's guidance on the rural economy and take account of policies on the Green Belt and the Chilterns Area of Outstanding Natural Beauty. The Local Plan should positively address rural diversification to support farms/rural area/rural economy.

- Various points were raised concerning the existing General Employment Areas and possible new employment sites.

(c) Task and Finish Group Meetings

4.27 Officers have been working closely with the Local Plan Task and Finish Group. This is a cross party panel of Members that has provided both high level guidance and detailed scrutiny of the emerging plan, its policies and proposals. As with the internal workshops discussed above, the feedback helped the Council refine the scope of, and broad approaches to and wording of key policies.

(d) Duty to Co-operate/ Cross Boundary Matters

4.28 The Duty to Cooperate (DtC) is an ongoing process, and we will need to demonstrate that this has been satisfied as a legal requirements by the time the Local Plan is submitted for Examination.

4.29 The Council has been working with nearby authorities and other organisations under the requirements of the DtC. These discussions have focussed on strategic matters that affect more than one authority and include unmet housing, as well as employment and infrastructure needs across the South West Hertfordshire authorities grouping (Dacorum, St. Albans, Watford, Three Rivers and Hertsmere). Engagement is continuing, but substantial alignment has been reached with many organisations on a range of issues. Consequentially, we have started to prepare Statements of Common Ground / Memoranda of Understanding with these organisations, which have in turn informed the consultation document.

4.30 We will continue these collaborative and positive discussions alongside the preparation of the Local Plan and the conclusions reached will be incorporated into the final Local Plan, where appropriate.

4.31 One of the main issues we have been discussing with nearby authorities is whether they can accommodate any of Dacorum's need for employment land. This matter is considered further under Issue 12 in chapter 5 below.

(e) Other Engagement with Key Stakeholders

4.32 Other engagement with key stakeholders took place during the preparation of the South West Hertfordshire Economic Study (2016) and the Economic Study Update (2019).

4.33 Paragraph 1.8 in the 2016 study states that the study has been based on analysis of a wide range of data sources and extensive consultation. Also, consultation has involved various approaches, including:

- Conducting an interview with the Hertfordshire Local Enterprise Partnership (LEP).

- Interviewing a selection of business stakeholders/estate agents (listed in Appendix D to the study).
- Discussing the key conclusions at a stakeholder workshop in September 2015.

4.34 The list of consultees in Appendix D to the 2016 study includes:

- Hertfordshire LEP
- Hertfordshire Chamber of Commerce
- Maylands Partnership
- Maylands Small Business Forum
- Local commercial agents – Aitchison Raffety, Brasier Freeth, Lambert Smith Hampton, and Stimpsons

4.35 A separate Workshop Report on the September 2015 stakeholder event is available. Paragraph 1.9 in the 2016 study states that the feedback received at the workshop generally supported the key findings of the study.

4.36 Chapter 6 in the 2019 Economic Study Update assessed commercial property market trends. Paragraph 6.3 states that the assessment is based on various factors, one of these being a small number of consultations with local commercial agents including Brasier Freeth, Lambert Smith Hampton and Stimpsons.

5. KEY ISSUES

5.1 This chapter examines the key issues relating to employment land for the new Local Plan. It is also important to bear in mind the questions the Council asked on employment development in the Local Plan Issues and Options consultation document (2017) and the Council's conclusions on these questions – see paragraphs 4.5-4.23 above. The position is summarised below:

Question	Council's conclusion
20: Do you agree with the definition of the Functional Economic Market Area in the South West Hertfordshire Economic Study?	The FEMA should cover Dacorum, Hertsmere, St Albans, Three Rivers and Watford council areas, as recommended in the Economic Study and the Economic Study Update.
21: Do you agree with the proposed approach to meeting future jobs growth?	<p>The Council agrees with Economic Study Update's advice that local plans should not set job growth targets. Instead, they should plan for appropriate increases in office and industrial floorspace.</p> <p>The amount of floorspace growth that should be planned for is considered below.</p>
22: Do you agree with the proposed approach to choosing sites to accommodate future jobs growth?	<p>The site specific recommendations on future employment development in the 2019 Economic Study Update differ in some important respects from the 2016 and 2017 studies.</p> <p>Therefore, further consideration is given to potential new employment sites under Issues 9 and 13.</p>

5.2 Issues 1-14 below consider employment land supply in Dacorum, taking account of the indicative floorspace growth figures for office and industrial development in the South West Hertfordshire Economic Study Update 2019 (see paragraphs 3.20-3.24 above). Issues 15-17 deal with other matters.

5.3 With regard to employment land supply, it should be noted that:

- Issues 1 and 2 are concerned with the time period for the indicative floorspace figures in the new Local Plan and whether these figures should change as a result of Covid-19.

- Issues 3-7 examine employment land supply assuming no change to the Council's existing planning policies.
- Issues 7-11 consider the likely implications of the policies and proposals in the Local Plan Emerging Strategy for Growth consultation document, excluding the potential for new greenfield employment sites.
- Issue 12 looks at whether Dacorum's unmet employment land needs can be met by neighbouring authorities.
- Issue 13 assesses the potential for new greenfield employment sites in Dacorum.
- Issue 14 reaches a conclusion on Dacorum's employment land supply and indicative floorspace figures.

5.4 The following points should also be noted regarding the indicative floorspace figures:

- The 'office' figures include research and development floorspace as well as offices. Both uses now fall within the new Use Class E (see paragraphs 2.16 and 2.17 above).
- The 'industrial' figures relate to light industrial floorspace (now within Use class E), general industrial space (Class B2) and storage or distribution space (Class B8).
- The indicative floorspace figures are expressed in terms of sq. metres gross internal area (GIA).

Issue 1: Should the indicative floorspace figures in the new Local Plan relate to the 2018-2036 or 2020-2038 period?

5.5 Tables 9.1 and 9.2 in the South West Hertfordshire Economic Study Update contain indicative floorspace figures for office and industrial floorspace growth over the 2018-2036 period. However, the proposed Plan period for the new Dacorum Local Plan is 2020-2038.

5.6 As an interim approach, the indicative floorspace figures in the Local Plan Emerging Strategy for Growth consultation document refer to 2018-2036. Before the Local Plan is published, the Council will seek advice from the Economic Study consultants about amending the figures to relate to 2020-2038.

Issue 2: Will Covid-19 result in a long-term change in the demand for employment space, justifying revised indicative floorspace figures?

5.7 The indicative floorspace growth figures in the South West Hertfordshire Economic Study Update were produced in 2019, before Covid-19 had started to affect the demand for office and industrial floorspace. Covid-19 seems likely to lead to a long term decline in the demand for office floorspace, due to increased home working. It may also increase the demand for warehousing

space, as a result of increased internet shopping. However, it is too soon to draw firm conclusions at this stage.

- 5.8 The Council will seek advice from the Economic Study consultants on this issue before the Local Plan is published.

Issue 3: What employment floorspace completions have occurred since 2018?

Completions 2018-2019

- 5.9 The information below is derived from the Council's Employment Land Position Statement No. 43 (as at 1 April 2019). It also adds in 40,847 sq. metres of completed industrial floorspace at Prologis Park phase 1 in Maylands Business Park, which was omitted from the land position statement. This site saw the largest floorspace gain in 2018-2019.

Location	Gains		Losses		Net change	
	Offices	Industrial	Offices	Industrial	Offices	Industrial
Maylands, Hemel	550	68,258		-73	550	68,185
Hemel town centre			-7,843		-7,843	
Rest of Hemel			-556	-5,678	-556	-5,678
Berkhamsted			-240		-240	
Tring			-359	-100	-359	-100
Bovingdon						
Kings Langley			-37	-1,083	-37	-1,083
Markyate			-44		-44	
Countryside	660	101		-1,658	660	-1,557
Total	1,210	68,359	-9,079	-8,592	-7,788	59,767

Completions April 2019-March 2020

- 5.10 The table below provides provisional information from Hertfordshire County Council on sites where gains or losses of B-class floorspace were completed between 1 April 2019 and 31 March 2020. A full survey has not been carried out, so it is likely that the table does not include all sites where completions took place during this period.

Location	Gains		Losses		Net change	
	Offices	Industrial	Offices	Industrial	Offices	Industrial
Maylands, Hemel		3,790		-13,428		-9,638
Hemel town centre			-3,630	-928	-3,630	-928
Rest of Hemel		85	-593	-5,273	-593	-5,188
Berkhamsted						
Tring	282			-245	282	-245
Bovingdon						

Kings Langley						
Markyate						
Countryside	107	172	-50	-417	57	-245
Total	389	4,047	-4,273	-20,291	-3,884	-16,244

5.11 The largest floorspace gain in 2019-2020 was at Spring Park, Maylands Avenue on Maylands Business Park, where 3,800 sq. metres of industrial space was completed. Losses of employment floorspace exceeded gains, mainly due to losses on sites going over to residential use at:

- The Heart of Maylands site on Maylands Business Park, where 12,900 sq. metres of industrial space was demolished.
- Frogmore Road Industrial Estate in Apsley, where around 500 sq. metres of offices and 5,300 sq. metres of industrial space was lost.
- Hamilton House, Marlowes, Hemel Hempstead town centre, where over 3,300 sq. metres of offices were lost (prior approval change of use to housing).

Issue 4: What is the current level of employment floorspace commitments?

(i) Commitments on major sites (November 2020)

5.12 Appendix 4 contains a schedule of commitments on major sites (i.e. sites with committed gains or losses of over 1,000 sq. metres of office or industrial floorspace). The information in this appendix was compiled by:

- Taking Hertfordshire County Council's draft schedules of commitments at 1 April 2020.
- Amending the schedules to reflect the Borough Council's knowledge of particular sites.
- Adding commitments made since 31 March 2020 that the Council's officers are aware of.
- Excluding permissions that have now lapsed.

5.13 The table below summarises the information in Appendix 4. Commitments that are thought to be unlikely to be implemented are excluded from the table.

Estimated employment floorspace commitments on major site, November 2020

Location	Gains		Losses		Net change	
	Offices	Industrial	Offices	Industrial	Offices	Industrial
Maylands, Hemel	1,562	63,528	-9,530	-6,100	-7,968	57,428
Hemel town centre			-3,874		-3,874	
Rest of Hemel			-1,373		-1,373	

Berkhamsted						
Tring	47		-3,224		-3,177	
Bovingdon						
Kings Langley				-3,383		-3,383
Markyate						
Countryside				-1,216		-1,216
Total	1,609	63,528	-18,001	-10,699	-16,392	52,829

5.14 The largest commitments are all located at the Maylands Business Park in Hemel Hempstead and are as follows:

- Spencer's Park phase 2 (which will form an extension to Maylands Business Park): 7,500 sq. metres of industrial development permitted.
- Prologis Park phase 1, Unit 4: planning permission granted for a computer data centre for Gyron (26,382 sq. metres) is now under construction.
- Prologis Park phase 2: planning permission granted for 21,700 sq. metres of industrial floorspace.

5.15 The above sites have planning permission for 55,600 sq. metres of industrial floorspace. Apart from these sites, committed losses are higher than gains.

5.16 The other notable point shown by the table is that commitments thought likely to be implemented would result in a net loss of 16,400 sq. metres of office floorspace. There is a very low level of commitments for office gains, whilst all the committed losses (18,000 sq. metres) arise from prior approval schemes for changes of use from offices to housing.

(ii) Commitments on minor sites (1 April 2020)

5.17 Information on commitments on minor sites (i.e. sites with committed gains or losses of under 1,000 sq. metres of office or industrial floorspace) is taken from Hertfordshire County Council's draft schedules of commitments at 1 April 2020, adjusted to reflect the Council's knowledge of individual sites.

Location	Gains		Losses		Net change	
	Offices	Industrial	Offices	Industrial	Offices	Industrial
Maylands, Hemel	291	690		-165	291	525
Hemel town centre	55		-1,438	-133	-1,383	-133
Rest of Hemel	309		-310	-1,229	-1	-1,229
Berkhamsted	30	105	-1,375	-1,062	-1,345	-957
Tring	151		-24		127	
Bovingdon	9		-143	-44	-134	-44
Kings Langley	100				100	

Markyate						
Countryside	765	1,708	-214	-3,816	551	-2,108
Total	1,710	2,503	-3,504	-6,449	-1,794	-3,946

5.18 The table indicates a modest net loss of both office and industrial floorspace. Over 90% of the losses in office floorspace (3,200 sq. metres) are from prior approval schemes for change of use to housing.

(iii) Prior approvals granted since 31 March 2020 on minor sites for changes of use from offices to housing

5.19 Between 1 April and early November 2020, prior approval has been granted for some further proposals for change of use from offices to housing. The floorspace of these schemes is not known, but the floorspace involved is estimated below assuming 60 sq. metres for each home permitted:

Location	Office floorspace loss
Hemel town centre	300
Bovingdon	60
Total	360

(iv) Total current commitments

5.20 Totals for current commitments are shown in the table below. This table has been produced by adding the figures in the tables in sections (i)-(iii) above.

Location	Gains		Losses		Net change	
	Offices	Industrial	Offices	Industrial	Offices	Industrial
Maylands, Hemel	1,853	64,218	-9,530	-6,265	-7,677	57,953
Hemel town centre	55		-5,612	-133	-5,557	-133
Rest of Hemel	309		-1,683	-1,229	-1,374	-1,229
Berkhamsted	30	105	-1,375	-1,062	-1,345	-957
Tring	198		-3,248		-3,050	
Bovingdon	9		-203	-44	-194	-44
Kings Langley	100			-3,383	100	-3,383
Markyate						
Countryside	765	1,708	-214	-5,032	551	-3,324
Total	3,319	66,031	-21,865	-17,148	-18,546	48,883

5.21 The overall picture for commitments is very similar to that for the major sites, with:

- A net loss of 18,500 sq. metres of office floorspace. It is significant that excluding prior approval schemes for changes of use from offices to housing, commitments exist for a net gain of over 3,000 sq. metres of office space.

- A net increase of nearly 48,900 sq. metres of industrial floorspace. However, if not for the Prologis Park and Spencer's Park sites at the Maylands Business Park, there would be a net loss of 6,700 sq. metres of space.

Issue 5: What further potential exists for gains and losses of employment floorspace on sites consistent with existing policy?

5.22 Appendix 5 contains a schedule of sites which do not benefit from planning permission for the gain or loss of employment floorspace, but which have potential for such change. The sites in the schedule are either located in existing designated employment areas and allocations, and on other sites where the gain or loss of employment floorspace is consistent with the Council's current development plan documents. Several of the sites in Appendix 5 are identified as growth areas (i.e. allocations) in the Local Plan Emerging Strategy for Growth consultation document.

5.23 The table below shows the estimated change in employment floorspace from the sites assessed in Appendix 5.

Location	Gains		Losses		Net change	
	Offices	Industrial	Offices	Industrial	Offices	Industrial
Maylands, Hemel	1,400	25,800			1,400	25,800
Hemel town centre						
Rest of Hemel			-2,000	-8,100	-2,000	-8,100
Berkhamsted						
Tring						
Bovingdon						
Kings Langley						
Markyate				-1,500		-1,500
Countryside						
Total	1,400	25,800	-2,000	-9,600	-600	16,200

5.24 The largest potential floorspace gain is on the Council owned land at Maylands Gateway, Hemel Hempstead, where it is estimated that 24,000 sq. metres of industrial floorspace will be built. This gain is likely to be partly offset by losses of industrial floorspace on site allocated for housing development in the site Allocations document. There is little currently identified potential for gains or losses of office floorspace, although the Council would prefer the Maylands Gateway site to include a substantial office element.

5.25 Sites are listed in Appendix 5 only if there appears to be a reasonable chance of a change in employment floorspace taking place. Other changes are likely to occur – see the consideration of windfall losses and gains in paragraphs 5.25-5.30 below.

5.26 The Paradise/Wood Lane mixed use area in Hemel Hempstead is not included in the table above or listed in Appendix 5. This is despite the potential for changes in employment floorspace in line with the policy for the site in the Site Allocations document. However, it is difficult to predict what floorspace change will occur in line with existing policy. Therefore, the Paradise/Wood Lane area is considered in Appendix 6, which provides a full review of the existing GEAs and other land designated for employment use.

Issue 6: What windfall losses and gains of employment floorspace should be assumed?

5.27 There is a long-term trend in Dacorum for existing employment floorspace to be lost or gained on sites not specifically allocated for employment development. Losses have been considerably greater than gains. Some of the floorspace changes have been within designated employment areas and some on unallocated employment sites.

5.28 A high proportion of the employment floorspace lost has been replaced by housing. Since the permitted development regulations were changed in 2013, there has been a substantial loss of office floorspace through prior approval schemes for change of use to housing. As stated in paragraphs 2.37-2.40 above, the Council has now introduced Article 4 areas in key employment areas. This means that planning permission is required for changes of use from offices and some light industrial and warehouse buildings to housing.

5.29 The scale of future losses and gains will be influenced by the nature of the employment policies in the new Local Plan and whether any further Article 4 areas are designated. This applies both to designated employment areas and unallocated employment sites.

5.30 It is inevitable that some further losses and gains will be proposed in the future. However, the following points lead to the conclusion that the scale of losses is likely to be much lower than in the past:

- The supply of these sites is finite and many of the most obvious opportunities for redevelopment have already been taken up.
- A considerable quantity of further employment loss is already accounted for in Appendices 4-6).
- The loss of office floorspace from prior approval schemes is expected to slow sharply following the Council's Article 4 areas becoming operational in January 2020. However, some losses from prior approvals can still be expected outside the Article 4 areas.
- The amount of vacant office and industrial floorspace across South West Hertfordshire has fallen to a low level and rents have risen (see chapter 6 in the South West Hertfordshire Economic Study Update). This reduces the incentive for landowners to propose redevelopment for non-employment uses.

5.31 It is difficult to estimate what further change in employment floorspace from such losses and gains in the future. At present, the employment land supply calculations assume the following floorspace loss:

- Office floorspace: loss of 10,000 sq. metres.
- Industrial floorspace: loss of 20,000 sq. metres.

5.32 Before the Local Plan is published, the Council will:

- Look at the pattern of past losses and gains of employment floorspace and consider what element can be described as windfall.
- Amend the windfall estimates, if necessary, in the light of further analysis.

Issue 7: What conclusions on employment land supply should be reached in the light of Issues 3-6, assuming no change to existing policies?

5.33 Issues 3-6 examined employment land supply assuming no change to the Council's existing planning policies. These issues looked at:

- Completions since 2018 (Issue 3).
- Current commitments (Issue 4).
- The potential for further gains and losses of employment floorspace on sites consistent with existing policy (Issue 5).
- Assumed windfall losses and gains of employment floorspace (Issue 6).

5.34 The table below presents the results of this analysis:

Indicative net floorspace requirements 2018-2036	Office uses	Industrial uses
Net change	45,100	196,500
Supply		
Completions 2018-2019	-7,788	59,767
Completions 2019-2020	-3,884	-16,244
Commitments November 2020, excluding those unlikely to be implemented	-18,546	48,883
Further potential on sites consistent with current policy	-600	16,200
Windfall losses and gains	-10,000	-20,000
Total net supply	-40,818	88,606
Balance	-85,918	-107,894

5.35 Clearly, there is a large shortfall in the supply of office and industrial land. Indeed, there is virtually no office land supply. This reflects the fact that speculative office development is not currently viable on any of the available employment sites in Dacorum, as stated in paragraph 7.2 in the Dacorum Employment Land Availability (2017) and paragraph 6.29 in the South West Hertfordshire Economic Study Update (2019).

5.36 It should be recognised that there is considerable uncertainty surrounding the above estimates. The Council will undertake further work before the Local Plan is published to reduce the level of uncertainty, as far as possible.

Issue 8: Should any changes be made to the existing General Employment Areas and other land designated for employment use?

5.37 The Dacorum Employment Land Availability Assessment (ELAA) 2017 and the South West Hertfordshire Economic Study Update (2019) identified a need for more employment land and recommended that most of the existing employment land should be retained. Therefore, in the new Local Plan, existing employment areas should not be deleted or reduced in size except where there is a very strong case for making such a change.

5.38 Examples of circumstances that might constitute a very strong case for deleting or reducing the size of existing employment areas are:

- If the site is no longer mainly in office or industrial use.
- If the existing employment uses are of a low quality and there is potential for high density new housing in a highly accessible location that would increase the vitality and viability of a town or local centre.

5.39 Appendix 6 contains an assessment of the existing General Employment Areas (GEAs) and other land designated for employment use.

Issue 8: conclusion

5.40 The table below summarises the conclusions reached in Appendix 6 on the way forward for each area in the new Local Plan:

Employment area	Conclusion in Appendix 6
Hemel Hempstead	
Breakspear Park	Include in a GEA covering all of Maylands Business Park.
Buncefield	Reduce size of GEA to reflect current extent of oil terminal in Dacorum.
Maylands	As Breakspear Park above, but exclude south part of Mark Road and include in Maylands local centre.
Maylands Avenue	Retain GEA designation for part of area and include in Maylands Business Park GEA. Include rest of area in Maylands local centre.
Prologis Park (part), Maylands Gateway	As Breakspear Park above.
Spencer's Park	As Breakspear Park above.
Swallowdale	Remove GEA designation from part of area, including Aldi and proposed housing site at Council depot. Include rest in Maylands Business Park GEA.
Paradise/Wood Lane	Delete the mixed use housing/employment allocation. Allocate for housing led development, with employment uses (including offices) at ground floor level, where viable.
Apsley	Retain GEA.
Apsley Mills	Delete GEA. Include part in Apsley district centre.

Corner Hall	Delete GEA. Allocate for housing led development, with employment uses (including offices) at ground floor level, where viable.
Doolittle Meadows	Retain GEA.
Frogmore Mill	Delete GEA. Include in Apsley district centre.
Two Waters (east)	Retain GEA.
Two Waters (west)	Retain GEA, but delete Symbio House (proposed housing) and London Road frontage.
Berkhamsted	
Billet Lane	Delete GEA. Allocate for housing.
Northbridge Road	Retain GEA.
River Park	Retain GEA.
Tring	
Akeman Street	Delete GEA.
Brook Street	Retain GEA, but delete small area in north.
Icknield Way	Retain GEA.
Icknield Way extension	Delete GEA designation. Allocate for housing.
Markyate	
Sharose Court and 3 London Road	Retain Sharose Court in GEA, but delete 3 London Road.
Countryside	
Bourne End Mills	Retain and expand GEA.
Bovingdon Brickworks	Retain and expand GEA.

5.41 Some of the floorspace losses and gains likely to arise within employment areas from the conclusions in Appendix 6 have already been included in Appendices 4 and 5 and taken into account under ‘commitments’ and ‘further potential’ earlier in chapter 5.

5.42 It is difficult to estimate what further change in employment floorspace would arise from the conclusions in Appendix 6. Further work will be undertaken before the Local Plan is published to estimate:

- The existing office and industrial floorspace on areas that would lose their employment land designation.
- What proportion of this land would actually go out of employment uses.
- The amount of new office floorspace that might be built on sites where the Plan encourages offices in mixed use development.

5.43 In advance of this work, the following assumptions are used in the employment land supply calculations:

- Office floorspace: no net change (i.e. new floorspace would cancel out losses).
- Industrial floorspace: loss of 20,000 sq. metres.

Issue 9: What is the potential for new employment sites in towns and large villages?

- 5.44 The shortfall of employment land shown under Issue 7 and reinforced by the conclusion on Issue 8 means that it is necessary to examine the scope for allocating new employment sites in the Local Plan within the Borough's main settlements.
- 5.45 There is some potential for new employment development on sites consistent with existing policy (see Issue 5 above). However, the potential for completely new employment sites in the existing urban areas is very low. This is mainly because, as stated in the evidence base studies, speculative office development is not currently viable. Also, industrial development on any scale requires large sites which simply aren't available in our highly developed urban areas.
- 5.46 As a result the only potential new urban employment site assessed in the Dacorum Employment Land Availability Assessment and the South West Hertfordshire Economic Study Update was Hemel Hempstead Station Gateway.
- 5.47 The evidence base studies show that the Station Gateway site is well located for office development. However, there are constraints to actually achieving new offices there. The main aim at this site is to achieve major improvements to the station. A master plan for this site is being prepared and this shows that a large residential element will be required to fund the station improvements and make the overall development viable. Offices are unlikely to be included in the early phase(s) of the development, but a modest office element may be possible in later phases. It would seem reasonable to assume 1,000 sq. metres of offices.
- 5.48 Market Square is identified in paragraph 4.12, site 4 of the Further Dacorum Retail Study (2020)⁹ as the most suitable location for new retail development in Hemel Hempstead town centre. There is scope for offices, housing and other town centre uses on the upper floors. It is uncertain how much, if any, office floorspace will be provided, but it is considered that 500 sq. metres should be assumed.
- 5.49 The Further Dacorum Retail Study (paragraph 4.12, site 8) shows the High Street/Brook Street site as the best site for retail development in Tring Town centre. Offices or housing could be provided above retail development and on the Brook Street frontage. However, there is considerable uncertainty over the deliverability of a retail led scheme on this site. Therefore, it would be prudent to assume that no office floorspace will be provided.

Issue 9: conclusion

- 5.50 It is assumed that new employment sites in existing towns and large villages will contribute 1,500 sq. metres of office floorspace, but no industrial space.

⁹ Add link once placed on website

Issue 10: Is any loss of employment floorspace expected from other site specific proposals in the Local Plan Emerging Strategy for Growth?

5.51 There only site specific proposals in the Local Plan Emerging Strategy for Growth (apart from those covered in Appendices 4-6) that may involve the loss of employment floorspace are:

- Growth Area HH17: Cupid Green Depot, Hemel Hempstead
- Growth Area Bk02: British Film Institute, Berkhamsted

5.52 Before the Local Plan is published, the Council will establish which use classes the above sites fall within and the amount, if any, of employment floorspace that would be lost. However, the impact on the employment land calculation is unlikely to be significant given the scale of windfall losses of employment land we are assuming at this stage under Issue 6.

Issue 11: How do the conclusions on Issues 8-10 affect the conclusions in Issue 7 on employment land supply?

5.53 Issue 7 above considered Dacorum’s employment land supply assuming no change to the Council’s existing planning policies. Issues 8-10 then examined the likely implications of the policies and proposals in the Local Plan Emerging Strategy for Growth consultation document, excluding potential new greenfield employment sites. The conclusions are summarised in the table below:

Indicative net floorspace (sq. metres) requirements 2018-2036	Office uses	Industrial uses
Net change	45,100	196,500
Supply		
Issue 7: conclusions assuming no change to existing policies	-40,818	88,606
Issue 8: floorspace change from proposed changes to existing General Employment Areas and other land designated for employment use	-	-20,000
Issue 9: potential from proposed new employment sites in towns and large villages	1,500	-
Issue 10: loss of employment floorspace from other non-greenfield site specific proposals	-	-
Total net supply	-39,318	68,606
Balance	-84,418	-127,894

5.54 It can be seen that there is still a very substantial shortfall in Dacorum’s employment land supply against the indicative floorspace figures in the South West Hertfordshire Economic Study Update (2019).

Issue 12: Can Dacorum’s unmet employment land needs be met by adjoining and nearby authorities?

5.55 Given the conclusion in Issue 11, the Council has had to examine whether adjoining and nearby authorities can accommodate Dacorum’s unmet

employment land needs. The aim is for these needs to be met elsewhere within the South West Hertfordshire Functional Economic Market Area (FEMA).

5.56 As explained in paragraph 3.23 above, indicative district-level floorspace figures for 2018-2036 were set out in the South West Hertfordshire Economic Study Update (2019), to inform Local Plan preparation. However, the study advised that decisions on floorspace and land requirements in local plans should be informed also by duty to co-operate discussions, which take account of land availability for new development across the FEMA (i.e. South West Hertfordshire).

5.57 The table below summarises the employment land position in South West Hertfordshire, as set out in Tables 9.1 and 9.2 of the Economic Study Update. Columns 2-4 show the indicative floorspace figure, the supply of employment land and the overall balance for each district.

Market balance – office uses (sq. metres)			
	Indicative floorspace figure 2018-2036	Supply	Balance
Dacorum	45,100	-23,192	-68,292
Hertsmere	35,700	-8,142	-43,842
St Albans	39,500	123,386	83,886
Three Rivers	30,100	54,363	24,263
Watford	37,600	117,462	79,862
Total	188,000	263,877	75,877
Market balance – industrial uses (sq. metres)			
	Indicative floorspace figure 2018-2036	Supply	Balance
Dacorum	196,500	76,369	-120,131
Hertsmere	81,900	61,530	-20,370
St Albans	75,900	155,997	80,097
Three Rivers	28,800	-11,145	-39,945
Watford	98,400	-12,588	-110,988
Total	481,500	270,163	-211,337

5.58 Dacorum's indicative floorspace figures are 45,100 sq. metres (offices) and 196,500 sq. metres (industrial). As stated in paragraph 3.24 above, Dacorum has the highest figures for office and industrial growth, with the industrial figure being nearly twice that of any other South West Hertfordshire district. Also, as shown in column 4 of the table above, Dacorum has the largest shortfalls in office and industrial land supply in relation to the indicative floorspace figures.

- 5.59 It should be recognised that the land supply figures in the Economic Study Update were a snapshot in time. They were produced before the local authorities, except St Albans, were very advanced in preparing their local plans. Indeed, the shortfalls in Dacorum are now estimated to be larger than stated in the Economic Study Update (see paragraph 5.53 above). Before the Dacorum Local Plan is published, the employment land supply calculations will be revised again. It will be also important to obtain revised employment land availability information from the other South West Hertfordshire authorities, including the capacity of sites they intend to allocate in their Local Plans.
- 5.60 Another issue that may need to be considered are any changes in demand for employment floorspace arising from Covid-19.

Office land

- 5.61 Overall office land supply in South West Hertfordshire exceeds the indicative floorspace figure by 76,000 sq. metres, but Dacorum has a shortfall of 68,000 sq. metres against its indicative floorspace figure. There are surpluses in Watford, Three Rivers and St Albans. The latter has an oversupply of 84,000 sqm, due to the capacity for 152,000 sq. metres of offices on the proposed 55 ha. employment site at East Hemel Hempstead.
- 5.62 However, paragraphs 8.37-8.41 in the Economic Study Update explained that there may not be sufficient demand for large scale office development at East Hemel Hempstead. Office development is not currently viable there, but office rents were increasing pre-Covid so new development may become viable. The Economic Study Update concluded that:

“...on balance we believe that some development could come forward at East Hemel Hempstead, although there is still significant uncertainty about the quantity of space which could be delivered.”

- 5.63 As stated in paragraph 3.28 above, the Economic Study Update recommended that the South West Hertfordshire authorities should undertake further work to identify potential reserve sites for 10 ha. of office development, should delivery issues arise at East Hemel Hempstead. This land should ideally be located close to a train station offering fast journey times to London.

Industrial land

- 5.64 With industrial land supply, the Economic Study Update indicated a shortfall of 211,000 sq. metres in South West Hertfordshire. This includes an under supply of 120,000 sq. metres in Dacorum. However, St Albans City and District has a surplus of 80,000 sq. metres, because of the potential at East Hemel Hempstead.
- 5.65 The Economic Study Update recommended (see paragraph 3.30 above) that there was a need for 53 ha. of additional land for industrial development to address the shortfall across South West Hertfordshire. Additional strategic industrial development sites with good access to the strategic road network

were needed. The authorities should undertake technical work to identify sites to meet the identified demand. This technical work has not been commissioned, but as with office land, potential sites may emerge via the Strategic Sites Study for the Joint Strategic Plan.

- 5.66 As mentioned in paragraph 3.32 above, the Economic Study Update also identified a lack of land for small scale industrial uses in Dacorum, Watford and Three Rivers. The study suggested that these authorities may wish to allocate additional sites to meet this need, including sites in the A41 corridor in Dacorum.
- 5.67 Planning permission has been granted for a Strategic Rail Freight Interchange on the former Radlett Aerodrome site in St Albans District. Over 331,000 sq. metres of industrial space is proposed (mostly very large warehouses). However, Table 9.2 in the Economic Study Update does not include this permission, because the emerging St Albans Local Plan proposed housing development on the site.

Duty to co-operate discussions

- 5.68 Discussions under the duty to co-operate have taken place between Dacorum and the other South West Hertfordshire authorities. As yet, no final decisions have been made regarding any changes to the distribution of the indicative floorspace figures or whether some authorities should accommodate unmet employment land needs from others. This reflects the fact that Hertsmere, Three Rivers and Watford have not yet published their plans, whilst St Albans is expected to withdraw its plan in the light of letters from their Local Plan Inspectors.
- 5.69 Despite the above, Dacorum and St Albans councils are working together to ensure that most of our unmet need will be accommodated on the East Hemel Hempstead site in St Albans District. This site is ideally located, as it will act as an extension to Maylands Business Park. It also forms the principal development opportunity in the Herts Innovation Quarter Enterprise Zone.
- 5.70 Given the surpluses shown for St Albans in the Economic Study Update (see table in paragraph 5.57 above), we envisage that the East Hemel Hempstead site will accommodate around 84,000 sq. metres of our unmet office floorspace need and 80,000 sq. metres of our unmet need for industrial space. This would almost overcome Dacorum's shortfall in office floorspace, but still leave us around 47,900 sq. metres short of industrial space.
- 5.71 In view of the above, the issue of where Dacorum's unmet office floorspace should be accommodated must be considered further under the duty to co-operate before the Local Plan is published.
- 5.72 With regard to industrial land, further consideration will be given by the South West Hertfordshire authorities to the implications of St Albans Council's decision on the Radlett Aerodrome Strategic Rail Freight Interchange.

Issue 12: conclusion

5.73 Issue 11 showed that Dacorum has an estimated shortfall of around 84,400 sq. metres of office floorspace and 127,900 sq. metres of industrial space against the indicative floorspace figures in the Economic Study Update. We envisage that the East Hemel Hempstead site in St Albans District will accommodate 84,000 sq. metres (i.e. nearly all) of our unmet office floorspace need and 80,000 sq. metres of our unmet need for industrial space. This would still leave us around 47,900 sq. metres short of industrial space.

5.74 However, there are a number of uncertainties that must be resolved before the Dacorum Local Plan is published. These uncertainties include:

- The outcome of further updating of Dacorum's employment land supply calculations.
- The current employment land supply position in the other South West Hertfordshire authorities, including the capacity of proposed site allocations.
- Whether any medium to longer term impacts could materialise as a result of Covid-19.
- The implications of the decision by St Albans to include the Radlett Aerodrome Strategic Rail Freight interchange in their Plan.
- How much office development will be viable at the East Hemel Hempstead site and whether a higher amount of industrial development should be proposed there.
- The results of discussions taking place across South West Herts on unmet needs.

5.75 Whatever conclusions are reached about these uncertainties, we expect that South West Hertfordshire's employment land needs will be accommodated within the FEMA. Therefore, we do not envisage having to ask other authorities, such as Buckinghamshire, Central Bedfordshire and Luton, if they can meet any of our unmet needs.

Issue 13: What is the potential for new employment sites outside existing urban areas in Dacorum?

5.76 The examination of Issues 11 and 12 shows that:

- Almost all of Dacorum's unmet need for office land can be met at the East Hemel Hempstead site in St Albans District, but there is uncertainty over office viability here..
- Even if the East Hemel Hempstead site accommodates 80,000 sq. metres of our unmet need for industrial floorspace, this still leaves a shortfall of around 47,900 sq. metres. The qualitative need for more land

for small and medium sized industrial development is another important consideration.

- There are a number of other uncertainties.

5.77 Against this background, the Council felt that it was necessary to assess the potential for new employment sites outside existing urban areas in Dacorum. A number of potential sites were considered in the Dacorum Employment Land Availability Assessment and the South West Hertfordshire Economic Study Update. Appendix 7 assesses the sites covered by these studies and some additional sites. These sites are all located in the Green Belt.

5.78 The Economic Study Update assumes the following plot ratios:

- Offices: 0.8
- Industrial: 0.4

5.79 The Council agrees that a 0.4 plot ratio is appropriate for industrial development. However, plot ratios for offices vary greatly from site to site. Town centre office plot ratios are often much higher than 0.8, whilst out-of-town offices have tended to have plot ratios well below this figure. However, trends towards taller buildings, lower parking provision and placing car parking below buildings mean that 0.8 may be achievable in some out of town locations. It is concluded, therefore, that office plot ratios should be considered on a site by site basis.

Potential office sites

5.80 Evidence in the Employment Land Availability Assessment and Economic Study Update indicates that office development is not currently viable in the Borough and the only sites that have good prospects for achieving viability are those with good road and rail access. There are very few such opportunities in Dacorum, but two possible sites are assessed in Appendix 7. These sites have been promoted for development by the landowners and were considered in the employment studies:

- Shendish Manor, Apsley
- Wayside Farm, Kings Langley

5.81 The employment studies showed that these sites are well located for office development. However, there are major constraints to actually achieving new offices in these locations:

Shendish Manor: new offices here would be located to the south west of Apsley station, but the Economic Study Update concluded that:

“...there are access and environmental constraints that are likely to limit its potential as an employment location. A small portion of the site may be suitable for employment in the form of B1 uses as part of any residential led scheme.”

Wayside Farm: this is a commercially attractive site for office development, as it is within walking distance of Kings Langley station, is close to M25

Junction 20 and is on the main bus route from Watford to Hemel Hempstead. However, it appears that large-scale development is not possible unless a major improvement to M25 Junction 20 is carried out. Currently, there are no firm proposals to improve this junction, although Hertfordshire County Council has referred to the need for improvement in the South West Hertfordshire Growth and Transport Plan.

Potential industrial sites

5.82 Apart from the Shendish Manor and Wayside Farm sites, the sites assessed in Appendix 7 are more likely to be commercially attractive for industrial than office development, although some offices could be included. From the analysis in Appendix 7, the sites listed below are considered to be most suitable for industrial development. They are all located in the A41 corridor and could help meet the demand for small and medium sized industrial units.

Location	Net developable area (ha.)	Estimated industrial floorspace (sq. metres)
Two Waters Road/A41 Junction, Hemel Hempstead	5.0	20,000
Dunsley Farm, Tring	5.0	20,000
Bourne End Mills extension	1.1	4,400
Bovingdon Brickworks extension	0.7	3,500
Total	11.5	47,900

Issue 13: Conclusion

5.83 The conclusions below on new sites for office and industrial development outside existing urban areas should be regarded as provisional. These conclusions are considered to be appropriate in the light of the examination of Issues 1-12 above. They provide a clear rationale for the policies and proposals on employment land in the Local Plan Emerging Strategy for Growth. Nevertheless, as recognised in various places in the examination of these issues, there are several uncertainties still to be resolved and more technical work to be undertaken. Therefore, the Council will revisit these issues at the publication stage of the Local Plan and decide whether any changes to the provisional conclusions would be justified.

(i) Office sites

5.84 The Council concludes that land should not be released from the Green Belt for office development in the new Local Plan. This conclusion reflects the findings in paragraph 5.76, the constraints relating to the Shendish Manor and Wayside Farm sites and the overall floorspace surplus in relation to the indicative floorspace figures in South West Hertfordshire.

(ii) Industrial sites

5.85 The above analysis shows that there:

- Is a substantial shortfall against Dacorum's indicative floorspace figure.
- Is a severe shortage of land for small and medium sized firms.
- Are suitable and available sites in the A41 corridor that have sufficient capacity to overcome the shortfall in land supply and are well located to help meet the need for small and medium sized units.

5.86 The Council concludes that these factors constitute exceptional circumstances, sufficient to justify the release of Green Belt land for industrial development. Therefore, the Local Plan Emerging Strategy for Growth consultation document proposes industrial development as per the table in paragraph 5.82 above.

5.87 The Hemel Hempstead and Tring proposals involve the removal of land from the Green Belt, with the Tring site also being proposed for other uses including housing. The Bourne End Mills and Bovingdon Brickworks sites will remain in the Green Belt, but they involve the extension of defined employment areas in the Green Belt onto land outside the boundaries shown in the Site Allocations Development Plan Document.

Issue 14: What conclusions should be reached on Dacorum's 2018-2036 employment land supply and indicative floorspace figure?

Employment land supply

5.88 The table below summarises the position on employment land supply in Dacorum. It shows that supply almost exactly matches the indicative floorspace figures for office and industrial land in the South West Hertfordshire Economic Study Update (2019). However, this is the case only if a large element of Dacorum's employment land needs are met on the East Hemel Hempstead site in St Albans District.

Indicative net floorspace (sq. metres) requirements 2018-2036	Office uses	Industrial uses
Net change	45,100	196,500
Supply		
Issue 7: conclusions assuming no change to existing policies	-40,818	88,606
Issue 11: implications of policies and proposals in Local Plan Emerging Strategy for Growth consultation document, excluding new greenfield employment sites	1,500	-20,000
Issue 12: Dacorum's unmet needs accommodated outside the Borough at East Hemel Hempstead	84,000	80,000
Issue 13: new sites outside existing urban areas	-	47,900
Total net supply	44,682	196,506
Balance	-418	6

Indicative floorspace figures

5.89 As explained in paragraph 3.23 above, the indicative floorspace distribution shown in the Economic study Update is only a guide. Therefore, the study stated that decisions on floorspace and land requirements in local plans should be informed also by duty to co-operate discussions, which take account of land

availability for new development across the South West Hertfordshire Functional Economic Market Area.

(i) Offices

5.90 The following calculation shows that if 84,000 sq. metres of Dacorum’s office floorspace need is met outside the Borough (as indicated in Issue 12 above), it means that our 2018-2036 requirement is for a net loss of 38,900 sq. metres:

Indicative floorspace figure in Economic Study	45,100 m ²
Floorspace to be provided outside Dacorum	84,000 m ²
Floorspace requirement within Dacorum	-38,900 m ²

5.91 However, most of this loss has already taken place since 2018 or is committed, so is not within the Council’s control. The conclusions on Issues 3 and 4 show that completions 2018-2020 and current commitments (if all implemented) will result in a net loss of 30,200 sq. metres. Any losses or gains from current commitments are likely to occur by March 2025.

5.92 This implies that from April 2025 onwards, the net loss of office floorspace is estimated to be much lower, at about 8,700 sq. metres. Further losses and gains can be expected, in particular from:

- Sites consistent with existing policy (see Issue 5)
- Windfall losses and gains (Issue 6)
- New employment sites in towns and villages (Issue 8)

5.93 The estimated net loss of 8,700 sq. metres of offices 2025-2036 is very modest in relation to Dacorum’s overall stock of office floorspace. This estimate is based on a string of assumptions and, as explained at various places in this topic paper, there are many uncertainties. There is a considerable margin for error in the estimates. In broad terms, therefore, it seems likely that from 2025 total office floorspace in the Borough will remain fairly stable.

5.94 It should be noted that the Council has taken a very cautious approach to estimating the scope for new office development in this topic paper, given the evidence on the viability of such development in the Dacorum Employment Land Availability Assessment and the South West Hertfordshire Economic Study Update. Nevertheless, if the market performs well, net office floorspace may start to increase again in Dacorum from the mid 2020s. The Council would like to see this happen.

5.95 In the light of the above, the Local Plan Emerging Strategy for Growth consultation document proposes the following indicative floorspace figure for office development:

- No net loss of space from 2025 onwards.

This excludes any contribution from the East Hemel Hempstead site in St Albans District.

Indicative floorspace figure: industrial

5.96 The following calculation shows that if 80,000 sq. metres of Dacorum's industrial floorspace need is met outside the Borough (as indicated in Issue 12 above), it means that our requirement is for a net gain of 116,500 sq. metres:

Indicative floorspace figure in Economic Study	196,500 m ²
Floorspace to be provided outside Dacorum	80,000 m ²
Floorspace requirement within Dacorum	116,500 m ²

5.97 The table in paragraph 5.87 above shows that industrial land supply (excluding any contribution from the East Hemel Hempstead site) almost exactly matches the floorspace requirement within Dacorum. Therefore, the Local Plan Emerging Strategy for Growth consultation document proposes the following indicative floorspace figure for industrial development in the Borough:

- Net floorspace increase of 116,500 sq. metres between 2018 and 2036.

6. CONCLUSIONS

- 6.1 This topic paper seeks to demonstrate that the Council has followed the requirements of Government planning policy in the NPPF and Planning Practice Guidance in assessing employment land supply and delivery in the Local Plan Emerging Strategy for Growth. The Council has also taken into account the evidence base and consultation to date in developing its employment land strategy.
- 6.2 Chapters 2-4 in this topic paper looked at the national and local planning policy context, the evidence base and the consultation and engagement on the new Local Plan. This analysis points to the need for the Council to consider including planning policies on employment land in the Local Plan which:
- Accommodate Dacorum's indicative floorspace growth figures for office and industrial space from the South West Hertfordshire Economic Study Update, if suitable sites can be found.
 - Retain existing employment sites unless there are over-riding planning reasons to the contrary.
 - Allocate additional industrial sites, if this can be achieved without serious harm to the Green Belt.
 - Enhance Maylands Business Park as Dacorum's premier business park, including support for green technological uses in Dacorum's part of the Hertfordshire Innovation Quarter Enterprise Zone.
 - Give high priority to medium and small sized businesses in new employment development.
 - Designate employment areas that are commercially attractive, with good road and public transport access and high quality amenities such as local shops and cafes.
- 6.3 Chapter 5 in the topic paper examined the key issues relating to employment land for the new Local Plan. The main messages arising from this examination are highlighted below:
- The indicative floorspace figures in the Local Plan Emerging Strategy for Growth consultation document should refer to 2018-2036. Before the Local Plan is published, the Council will seek advice from the Economic Study consultants about amending the figures to relate to 2020-2038.
 - Covid-19 may result in a long-term change in the demand for employment space, justifying revised indicative floorspace figures. The Council will seek advice from the Economic Study consultants on this issue prior to publication of the Local Plan.

- If there is no change to the Council's existing employment land policies, there will be very large shortfalls against the indicative floorspace figures. The estimated shortfalls are around 86,000 sq. metres for offices and 108,000 sq. metres for industrial floorspace.
- The Council has reviewed the existing General Employment Areas and other land designated for employment use, and has assessed the potential for new employment sites within existing towns and villages. The conclusions from this work show that the estimated shortfall in office floorspace falls only slightly to 84,400 sq. metres, whilst the industrial space shortfall rises to 127,900 sq. metres.
- Therefore, the Council has asked adjoining and nearby authorities if they can accommodate Dacorum's unmet employment land needs. From discussions under the duty to co-operate, we envisage that the East Hemel Hempstead site in St Albans District will accommodate 84,000 sq. metres (i.e. nearly all) of our unmet office floorspace need and 80,000 sq. metres of our unmet need for industrial space. This leaves us around 47,900 sq. metres short of industrial space. However, there are a number of uncertainties that must be resolved before the Dacorum Local Plan is published.
- Against this background, the Council has assessed the potential for new employment sites outside existing urban areas in Dacorum. The Council has concluded that no land should be released for office development. However, there are suitable and available sites in the A41 corridor with capacity to overcome the shortfall in industrial land supply and which are well located to help meet the need for small and medium sized units. The Council considers that these factors constitute exceptional circumstances, sufficient to justify the release of Green Belt land for industrial development.
- In the light of the assessment of employment land supply, the Local Plan Emerging Strategy for Growth consultation document proposes the following indicative floorspace figures (excluding any contribution from the East Hemel Hempstead site in St Albans District):
 - Offices: no net loss of space from 2025 onwards.
 - Industrial: net floorspace increase of 116,500 sq. metres between 2018 and 2036

6.4 This topic paper has informed the following policies in the Local Plan Emerging Strategy for Growth consultation document:

- Policy SP5 (delivering the employment strategy)
- Policy DM16 (General Employment Areas)
- Policy DM17 (other office and industrial sites)

- 6.5 The topic paper has also been taken into account in the consultation document's text on 'employment' in the delivery strategies. Finally, it provides the basis for the following site specific 'growth areas', proposed in the document's 'Proposals and sites' section for employment development or mixed development including employment use:

Growth area	Site
HH04	Paradise/Wood Lane
HH05	Market Square
HH08	Station Gateway
HH11	Two Waters North
HH16	Two Waters Road/A41 Junction
HH18	Kier Park
HH20	Breakspear Park/Green Lane/Boundary Way
Tr01	Dunsley Farm, Tring
Tr06	High Street/Brook Street, Tring
Cy01	Upper Bourne End Lane/Stoney Lane (Bourne End Mills extension)
Cy02	Bovingdon Brickworks extension

APPENDICES

APPENDIX 1: DACORUM'S EXISTING EMPLOYMENT POLICIES

Dacorum Core Strategy (September 2013)

Dacorum's Core Strategy sets out the Council's strategic policy framework. Policies that relate directly to providing for offices, industry, storage and distribution are:

- CS14: Economic Development
- CS15: Offices, Research, Industry, Storage and Distribution

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.

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, three 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.

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

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

Site Allocations Development Plan Document (July 2017)

The Site Allocations document provides more detailed site specific policies and proposals than those contained in the Core Strategy. All of Dacorum is covered in the Site Allocations except for east Hemel Hempstead, including the Maylands Business Park. It was intended to deal with this area in the East Hemel Hempstead Area Action Plan, but it is now being considered in the new Dacorum Local Plan.

Chapter 4 in the Site Allocations on 'Providing for offices, industry, storage and distribution' takes forward the strategic objectives of the Core Strategy. This chapter contains the following policies:

- Policy SA5: General Employment Areas
- Policy SA6: Employment areas in the Green Belt.

These policies seek to protect sites for B-Class employment uses. Guidance is given on which types of employment uses should be accepted on each employment area. The policies also provide guidance on other significant uses and planning requirements

At the end of chapter 4, the Schedule of Employment Proposals and Sites' proposes employment development on two sites.

Saved policies in the Dacorum Borough Local Plan 1991-2011 (2004)

Relevant 'saved' (i.e. still operational) policies from the 2004 Local Plan include:

- Policy 31: General Employment Areas (GEAs)
- Policy 34: Other Land with Established Employment Generating Uses
- Policy 37: Environmental Improvements

Saved Policy 31 provides similar guidance to Site Allocations Policy SA5. However, Policy 31 remains operational only in respect of the GEAs in East Hemel Hempstead (Buncefield/Maylands area). For GEAs elsewhere in the Borough, Local Plan Policy 31 has been superseded by Site Allocations Policy SA5.

The Employment section of the Local Plan also contains a 'Schedule of Employment Proposal Sites'. Again, only sites in the Maylands area are still relevant following the adoption of the Site Allocations.

Other Local Strategies and Guidance

Maylands Business Park

(i) Maylands Master Plan (June 2007)¹⁰

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

The Master Plan divides the business park into a number of character areas, where different types of employment development should be encouraged. One of the character areas is the Maylands Gateway site, located on the A414 Breakspear Way, close to M1 Junction 8. Maylands Gateway is Dacorum's main employment development site. The Master Plan proposes a first rate business park on the

¹⁰ [http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/supplementary-planning-documents-\(spds\)](http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/supplementary-planning-documents-(spds))

Gateway site and states that there is potential for around 130,000 sq. metres of office space.

(ii) Heart of Maylands Development Brief (October 2010)¹¹

Proposals for the area around the Heart of Maylands area (Maylands Avenue/Wood Lane End junction) are set out in the development brief, which was adopted by the Council in October 2010. The brief's aim is for the Heart of Maylands to become a strong functional centre for the businesses and employees working in Maylands Business Park. It proposes shops, cafés, restaurants, business services, community facilities, open space and access to public transport in a high quality built environment. By creating an attractive functional 'heart' for Maylands Business Park, it was hoped that this would help retain existing businesses and employees, and also attract new investment to the area.

The development brief also states that:

"The Heart will become a new local centre and a focus for human activity and social interaction with a new green open space, active ground floor uses, and enhanced landscaping. Development is expected to be mixed-use with local convenience shops, banks, salons, restaurants, cafés and small offices on the ground floor, with either residential or office development on upper floors."

iii) Maylands Gateway Development Brief (July 2013)¹²

Further guidance on the future planning of the Gateway site can be found in the Maylands Gateway Development Brief. A revised version of the brief was approved by the Council as a planning policy statement in July 2013. The revised brief gives increased flexibility over the type of jobs to be provided, including high quality B8 developments, to reflect current economic circumstances.

Hemel Hempstead Town Centre Masterplan (2013)¹³

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

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

¹¹ [http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/supplementary-planning-documents-\(spds\)](http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/supplementary-planning-documents-(spds))

¹² [http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/supplementary-planning-documents-\(spds\)](http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/supplementary-planning-documents-(spds))

¹³ [http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/supplementary-planning-documents-\(spds\)](http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/supplementary-planning-documents-(spds))

- the Gade Zone (section 5.2.1 of the Masterplan). The proposals for this zone include a new college, food store and Public Service Quarter; and
- the Hospital Zone (section 5.4.1), where the proposals include a reconfigured hospital, a new primary school and a wider mix of uses in the Paradise Employment Area.

APPENDIX 2: SUMMARY OF RESPONSE TO ISSUES AND OPTIONS CONSULTATION DOCUMENT

Question 20: Do you agree with the definition of the Functional Economic Market Area in the South West Hertfordshire Economic Study?’

There were 261 responses to Question 20. 64% of respondents answered ‘yes’ and 36% ‘no’. The table below summarises the response to this question:

Duty to co-operate bodies	Answer to question	Main points made
Central Bedfordshire Council	No	It is important that the defined economic area to be considered within the local plan is evidenced. It is considered that the Functional Economic Market Area (FEMA) identified in paragraph 7.1.2 appears to be appropriate.
Chiltern and South Buckinghamshire District Councils	Yes	Comments submitted jointly on Questions 20 and 21, but only the following related to Question 20: The Functional Economic Market Area for Dacorum is the same area as the Housing Market Area.
Hertfordshire County Council (Environment Department)	No	We have no comments to make on the extent of the FEMA. We welcome the recognition of the connections and relationships between Dacorum and surrounding authority areas, including those beyond the FEMA (e.g. Aylesbury, Luton). The South West Herts Growth & Transport Plan reaffirms the strong transport and travel demand patterns such as between the Watford area, St Albans and Hemel Hempstead.
Hertsmere Borough Council	Yes	The definitions of the Housing Market Area and Functional Economic Market Area referred to in the document are agreed.
Historic England	No	The comments made general points about the need for economic development to take account of the historic environment. These comments did not relate to the definition of the FEMA.

Watford Borough Council	Yes	The Council agrees in principle with the overall approach to employment and office uses land and types of employment as set out.
Welwyn Hatfield Borough Council	No	<p>The Welwyn Hatfield evidence has identified that St Albans falls with the Welwyn Hatfield Functional Economic Market Area.</p> <p>Accordingly, and in line with the Duty to Cooperate, there will need to be continuing dialogue between Welwyn Hatfield and the SW Herts authorities on matters to do with employment growth and employment land supply.</p> <p>It is acknowledged that employment forecasts fluctuate from year to year, and need to be kept under regular review. Account will need to be taken of economic cycles, the size of the working age population, commuting levels and provision elsewhere in the FEMA when deriving appropriate jobs targets.</p>
Local organisations		
Berkhamsted Citizens	No	Agree should cover similar area – BUT there is no mention of proximity to London and fast train routes. Housing Market Area is significant commuter area for London – how is this addressed?
Berkhamsted Residents' Action Group	Yes	
Berkhamsted Town Council	Yes	
Grove Fields Residents Association (Tring)	No	The South West Hertfordshire Economic Study should consider authorities to the west of the Borough, particularly Aylesbury Vale and Central Bedfordshire Councils if the Council are considering any potential economic growth to Tring or Berkhamsted to supplement the clear economic growth requirement in Hemel Hempstead.
Markyate Parish Council	Yes	

Northchurch Parish Council	No	Surely residents also commute to Aylesbury / Dunstable/Luton /Greater London as well as Dacorum/ Hertsmere/ St. Albans / Three Rivers/ Watford. There is little scope for Industry and warehousing within Northchurch and Berkhamsted!
Tring in Transition	Yes	
Tring Town Council	Yes	There is a clear logic to the approach running along a radial transport corridor from London. There is concern on the impact that the scale of growth at a regional level – AVDC, Central Beds, and the proposed Oxford/Cambridge arc – will have in this area of Hertfordshire.
Landowners and developers		
Gallagher Estates (developers of possible New Mill (Grove Road), Tring strategic site)	Yes	The definition of Functional Economic Market Area is agreed. It is important that enough homes are delivered over the plan period to meet the requirements of the economy.
General public		
		Several members of the public expressed support for the views (see above) expressed by the following organisations: <ul style="list-style-type: none"> • Berkhamsted Citizens' Association • Berkhamsted Town Council • Berkhamsted Residents' Action Group • Grove Fields Residents' Association (Tring)
		Other main points made by the public: <ul style="list-style-type: none"> • Some people consider that the FEMA is not correctly defined, it fails to take account of the influence of London, given the fast train services into the capital and the amount of commuting there.

		<ul style="list-style-type: none"> • There were also a number of comments stressing the linkages with Buckinghamshire (particularly between the Tring area and Aylesbury) and to a lesser extent with Luton/Central Bedfordshire. • Mixed views were expressed on whether St Albans should be part of the FEMA.
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Question 21: Do you agree with the proposed approach to meeting future jobs growth?

There were 314 responses to Question 21. 28% of respondents answered ‘yes’ and 72% ‘no’. The table below summarises the response this question:

Duty to co-operate bodies	Answer to question	Main points made
Aylesbury Vale District Council	No	<p>P.57– queried if there is likely to be any employment need that needs exporting outside the FEMA area and if so where might that go?</p> <p>P.58 – queried where the floorspace figures came from: the Economy Study or from job numbers using the Council’s own calculation method?</p>
Chiltern and South Buckinghamshire District Councils	Yes	There is an estimated need for 18 hectares for office space, but no target yet for industrial/ warehousing land. The Councils would like to be kept informed about progress on defining a target, the scale of strategic employment locations and their impact on the transport network.
Chiltern Conservation Board	No	<p>The plan needs to look ahead to prepare for the workplaces and lifestyles of the future. This is likely to include more working from home in the rural areas, and greater opportunities for employment in the rural leisure industry.</p> <p>The Chilterns AONB provides opportunities for sustainable tourism and health and wellbeing, making the protection of its natural beauty even more important.</p>

Hertfordshire County Council (Environment Department)	No	<p>The reference to the newly designated Enterprise Zone is supported.</p> <p>The reference in paragraph 7.2.10 to matching proposed growth sectors and the local workforce is important, to reduce the need to travel.</p> <p>Maylands has poor public transport provision, so businesses should adopt travel plans (voluntarily or through the planning process) to improve uptake of sustainable modes of transport.</p> <p>Warehousing tends to have fewer staff than offices, but generates more HGV traffic - which can make the environment less attractive for pedestrians and cyclists.</p>
Hertsmere Borough Council	Yes	<p>In terms of the choice of targets and how you will seek to meet them, the approaches will need to be agreed through on-going joint working and in a Statement of Common Ground with the HMA/FEMA authorities.</p> <p>The recognition of the close link between numbers of new homes and jobs targets and the need to keep this under review in preparing the Local Plan is welcomed.</p>
Historic England	No	<p>The role the historic environment has to play in the economy and the opportunity for growth should be recognised.</p>
St Albans District Council	No	<p>The support for employment development in the Enterprise Zone at East Hemel Hempstead is welcomed. However, there is insufficient recognition of the origins of the Enterprise Zone/ East Hemel Hempstead proposal in the Hertfordshire Local Enterprise Partnership's Strategic Economic Plan, or the potential role of the area for the FEMA as a whole.</p> <p>The potential for office development at East Hemel Hempstead is underplayed. Transport improvements, the Enterprise Zone status and support from the Hertfordshire LEP has the potential to significantly improve the market attractiveness for offices over time.</p> <p>The East Hemel Hempstead site also creates opportunities throughout the FEMA to convert some less market attractive employment land to residential use, thus reducing pressure for Green Belt greenfield housing development. Some parts of Maylands in particular could be reallocation for reasonably high density housing.</p>

		Given the East Hemel Hempstead proposal, the possible further greenfield office development at Kings Langley is hard to justify, even as 'safeguarded land' for the long term. It could also undermine the success of the East Hemel Hempstead site (especially the office part) and the scope for public transport improvements there. The exceptional circumstances required to release the Kings Langley site from the Green Belt for employment use do not appear to exist.
Welwyn Hatfield Borough Council	No	The comments submitted were the same as for Question 20 (see above).
Local organisations		
Berkhamsted Citizens	No	How is commuting addressed in the figures? Building additional houses for commuters and exporting work needs is not mentioned. Also, homes are being built in the Maylands industrial area, precluding that space for inward investment and potential local employment.
Berkhamsted Residents' Action Group	No	How is commuting addressed in the figures? Building additional houses for commuters and exporting work needs is not mentioned. Is all this job growth in the local area or in London? How much of our housing growth has been/ is to accommodate commuters? How much of the housing need has been encouraged by DBC and local estate agents proactively encouraging people to move to Dacorum from London?
Berkhamsted Town Council	Yes	Land should not be removed from the Green Belt in anticipation of need – need must be proven before making such a change. Speed of technical change may alter needs and decision should therefore be delayed until need is imminent.
CPRE – The Hertfordshire Society	No	In considering land availability for providing jobs, Dacorum's location in the London Green Belt should be taken into account. The NPPF requires the Council to demonstrate exceptional circumstances to justify releasing Green Belt land to accommodate new development. The number of jobs that are needed and can be justified will depend on the assessed need and a target set in the light of the NPPF and Green Belt constraints.
Dacorum Patients Group	No	Dacorum has very high employment and employers struggle to find employees, for example in the health and social care sector. There are many people who could work, but for various reasons such as health, educational and parenting or caring roles, there are no suitable jobs.

		<p>The Local Plan must ensure sufficient local employment opportunities for everyone of working age and employers should make reasonable adjustments for people with protected characteristics and carers. (Dacorum must not be reliant on London for its jobs).</p> <p>The Local Plan must also give employers confidence that this area can provide/attract a capable workforce by ensuring affordable housing, education/training facilities, community facilities and a healthy environment</p>
Grove Fields Residents Association (Tring)	Yes	We agree with the conclusions on office use, that there is a lack of capacity for commercial growth in Tring and that any economic growth should be proportionate and in keeping with the slower organic growth the market town has experienced in the previous plan period, rather than be subject to any significant economic allocation.
Markyate Parish Council	No	It is outside the Parish Council's brief, but it seems inappropriate to not seek to bring more office jobs into Dacorum's town centres. The workforce in warehousing jobs is not great, so many residents are going to need to find work somewhere.
Northchurch Parish Council	Yes	But we do not agree with the government's proposal to allow change of use from offices to residential without planning permission. This will not encourage new businesses to the area.
Tring in Transition	No	<p>Inclusion of site Tr-h5 (Dunsley Farm, Tring) as 5ha small industry/warehousing is flawed, as it is not assessed in the South West Hertfordshire Economic Study February 2016, nor included in appendix E to that study on the "list of designated employment areas not surveyed". What other sites potentially available for small industry/warehousing, elsewhere in Dacorum, have not been identified?</p> <p>Paragraph 7.10 refers to the demand for small units at the Maylands Business Centre, which suggests there is scope to encourage further provision of this type of business accommodation there.</p>
Tring Town Council	No	The South West Hertfordshire Economic Study (2016) states (paragraph 9.42) states that the future growth scenarios for South West Herts all point to high growth. The source of growth is "a significant increase in demand for office space". Dacorum is not starting from the best base, but its transport links, location, new methods of working, local further education providers and lower costs relative to London can present an attractive package.

		<p>Section 7.2 refers to opportunities for commercial growth. However, it takes the easy option of providing warehouse space, for which there is demand, but which will create relatively few poorly paid jobs whilst being 'land hungry'. In the rush for houses, commercial provision is being neglected and this is not helped by the 'prior approval' process. Opportunities for smaller business parks should be sought as well as large sites – the Icknield Way Industrial Estate extension in LA5 is an example and Tr-h5 Dunsley Farm, both close to the A41 with rail transport also available.</p> <p>The take-up of units in the Maylands Business Centre demonstrates what can be achieved.</p>
Landowners and developers		
Capital and Regional plc. (owners of the Marlowes Centre, Hemel Hempstead)	No	<p>The Issues and Options document estimates a further 11,000 jobs are needed over the plan period. Watford and St Albans are stated as the preferred office locations, though Hemel Hempstead is noted as having significant industrial and warehousing capacity in the Maylands area, including a significant office presence.</p> <p>Hemel Hempstead town centre could provide flexible office floorspace to supplement the offer in Watford and St Albans.</p>
The Crown Estate (developers of possible North Hemel Hempstead strategic site)	No	<p>A study by Savills in 2016 for The Crown Estate comes to very similar conclusions about the nature of job growth in Dacorum. It also found that the demand for offices is very weak. However, the establishment of the EnviroTech Enterprise Zone has the potential to stimulate office demand. In contrast, the industrial and warehousing market is much more positive with enquiries being received in respect of The Crown Estates land at East Hemel for both large warehouses and industrial space.</p> <p>It is considered that the 55 hectares of employment land at East Hemel has the potential to meet job growth throughout South West Hertfordshire.</p>
DLP Planning on behalf of Messrs. Bradnock, Latham, Chester & Smith (landowners at	Yes	<p>Whilst we have no specific comments on the job creation requirement, it is imperative that Dacorum achieves its potential to improve the area's economic prosperity and that sufficient housing is provided over the plan period to ensure a balance between jobs and workers, and reduce out-commuting to other large urban centres.</p>

Hempstead Road, Bovington)		
Gallagher Estates (developers of possible New Mill (Grove Road), Tring strategic site)	No	<p>The Issues and Options paper sets out that jobs in Dacorum will increase by 10,900 (full-time equivalent roles) between 2013 and 2036. For the South West Hertfordshire FEMA, an additional 60,700 jobs are forecast. These figures reflect the employment-led growth scenario in the South West Hertfordshire Economic Study (2016).</p> <p>In considering whether this scenario is ambitious enough, it is useful to look at past jobs trends in Dacorum and the wider FEMA. Between 2013 and 2016, Dacorum has consistently accounted for around 20% of total job growth in the FEMA, but it has only 18% of the proposed future growth. If the total FEMA jobs up to 2036 (60,700) are divided by current job share (20.6%), Dacorum Borough has over 12,500 jobs – 1,600 more than planned for in the Issues and Options document.</p> <p>The analysis suggests that Dacorum should have more ambitious jobs growth figures up to 2036. The borough has outperformed regional and national growth over the last five years.</p> <p>Therefore, the employment land requirements may not be sufficient to meet the Borough’s needs. The employment growth targets and employment land assumptions should be updated to a more appropriate level.</p> <p>It is welcomed that the Council recognises that the provision of jobs and homes is linked and depending on what housing target is finally established, the conclusions will be revisited.</p>
Grand Union Investments (developers of possible South Berkhamsted strategic site)	No	<p>The Council is proposing to facilitate the creation of new jobs by ensuring that the necessary built accommodation is available to accommodate new business activity. In doing so, the Council proposes to accept the recommendations of the South West Hertfordshire Economic Study (2016) for office growth and plan for a higher level of industrial and warehousing jobs.</p> <p>Of particular importance is that the Council plans for a flexible supply of employment land, to meet the requirements of new and existing businesses. The NPPF requires local planning authorities to:</p> <p>‘support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances’.</p>

Sarth Ltd.	Yes	<p>In considering the provision of additional employment land, as part of the aspirational plan making encouraged in the NPPF, the Council should consider the relative sustainability of different uses of existing sites. As a consequence there is an opportunity to look to achieve more sustainable uses of land while addressing locational disadvantages of existing uses.</p> <p>The A4251/Gossoms End/ Billet Lane junction in Berkhamsted is very busy and Billet Lane is a heavily used road. Given the sustainable location of the site, residential development of the remnant of industrial land on the south side of the Grand Union Canal would have a beneficial impact on the quantum and character of traffic generated by the site.</p>
Other commercial interests		
Mr Ivor Eisenstadt (local employer)	Yes	<p>As a local employer who recently had to leave Berkhamsted and move to Chesham due to the lack of appropriate local office space, I agree that Hemel Hempstead, Berkhamsted and Tring town centres are not commercially attractive locations for new offices.</p> <p>I agree that The Maylands Gateway area, next to Junction 8 of the M1 in Hemel Hempstead, is the only site in the area where major office building is proposed.</p>
The Little Cloth Rabbit	Yes	As Grove Fields Residents Association (see above).
General public		
		<p>Several members of the public expressed support for the views (see above) expressed by the following organisations:</p> <ul style="list-style-type: none"> • Berkhamsted Citizens' Association • Berkhamsted Town Council • Berkhamsted Residents' Action Group • Grove Fields Residents' Association (Tring)
		Other main points made by the public:

		<ul style="list-style-type: none"> • There is no need for more offices – this can be seen by the amount of empty office buildings and as many offices have been converted to flats or redeveloped for housing. • Modern working practices, such as home working, will reduce the need for office space. There is a need for flexible space, such as local cluster offices, where workers can congregate to share facilities. • Automation will reduce the number of jobs in warehouses. • The job growth targets are unlikely to be met, unless the transport infrastructure is improved, for example, by improving M25 Junction 20 at Kings Langley, tackling bottlenecks in Hemel Hempstead and improving public transport. • It is not clear what is assumed about commuting. Will the proposed new housing largely be occupied by London commuters? • If lower paid warehousing jobs are provided rather than higher paid office and industrial jobs, it will result in increased commuting to London.
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Question 22: Do you agree with the proposed approach to choosing sites to accommodate future jobs growth?

There were 349 responses to Question 22. 44% of respondents answered ‘yes’ and 56% ‘no’ . The table below summarises the response this question:

Duty to co-operate bodies	Answer to question	Main points made
Hertfordshire County Council (Environment Department)	No	<p>Commented on adequacy of bus services:</p> <p>SW Kings Langley - served by 500 bus route (key inter-urban route in the county with a regular timetable and good coverage of the day and the site is close to the rail station.</p>

		<p>East of A41 at Two Waters - served by 500 bus route, close to the two rail stations.</p> <p>Dunsley Farm, Tring – served by 500 bus route</p> <p>Maylands Gateway - OK. Bus services are most frequent at commuter times so further office or industrial / warehousing could add patronage</p>
<p>Hertfordshire County Council (Development services, Property, Resources)</p>	<p>No</p>	<p>As a landowner, HCC supports the approach to the delivery of additional employment sites and welcomes the fact that the Issues and Options paper is seeking to identify additional land to meet employment needs.</p> <p>Dunsley Farm, Tring Any new employment land should not be limited B1(c), B2 and B8 units. Preventing B1 (a) office use might make site less responsive to market demand and hinder the potential job opportunities for Tring, in the most walkable location. It would also run counter to the NPPF. A broader spread of potential employment uses would make the site more commercially attractive.</p> <p>High level highways assessment work confirms that the local highway network can accommodate the traffic generated from the potential employment area, together with that generated by residential and education uses.</p> <p>Wayside Farm, Kings Langley Wayside Farm is well located, close to Kings Langley station and M25 Junction 20. The Issues and Options consultation suggests that the land be held back as safeguarded land, so as not to jeopardise the success of the employment zone to the east of Hemel Hempstead at Maylands.</p> <p>The developable area of the Wayside Farm site is constrained as parts of the site are visually prominent.</p> <p>Highways congestion and capacity issues on the A4251 and at Junction 20, may also constrain development potential. The South West Herts Growth and Transport Plan (consultation due early 2018), will propose measures to address the capacity issues. However, highways issues may severely constrain the scale of development possible. Further work/discussion are needed to confirm deliverability at anything other than a relatively small scale.</p>

		Subject to addressing these issues, Wayside Farm could help meet employment needs earlier than the 2036 date in the Issues and Options consultation, particularly as proximity to Kings Langley railway station makes the site attractive to the market.
Historic England	No	<p>The role the historic environment has to play in the economy and the opportunity for growth should be recognised.</p> <p>The Local Plan should ensure that new employment site allocations are sustainably located and avoid harm to heritage assets and their settings, while existing sites and facilities are carefully managed.</p> <p>We have no comments on the suggested spatial approach to employment locations and developments, although care will need to be taken to avoid sites that harm the significance of heritage assets.</p>
St Albans District Council	No	Submitted the same comments as for Question 21.
Watford Borough Council	Yes	The overall approach to employment and office uses, land and types of employment are agreed in principle. It will be important to consider the infrastructure within, and in between, nearby settlements which will support the employment needs in the local area and enable businesses to benefit from other employment areas that may be located on other sites nearby or in the wider area.
Local organisations		
Berkhamsted Citizens	Yes, but	Land should not be removed from Green Belt in anticipation of need – must be proven before making such a change. Speed of technical change may alter needs and decision should therefore be delayed until need is imminent and proven
Berkhamsted Residents' Action Group	Yes	As Berkhamsted Citizens above.
Berkhamsted Town Council	Yes	As Berkhamsted Citizens above and the same as submitted by the Town Council for Question 21.

CPRE – The Hertfordshire Society	No	<p>The proposed locational approach for future jobs growth includes allocating three Green Belt sites: South west of Kings Langley for office development (as a reserve if insufficient new offices space is built at the Green Lane site, Hemel Hempstead); and east of the A41 at Two Waters and Dunsley Farm in Tring for industrial and warehousing. The Council considers that the need for additional employment land justifies the loss of Green Belt.</p> <p>The need for jobs is not an “exceptional circumstance” to justify using Green Belt land for employment use.</p>
Grove Fields Residents Association (Tring)	No	<p>We agree that, apart from growth in Hemel Hempstead, office development at Kings Langley would meet the needs of Dacorum and South West Hertfordshire.</p> <p>Given the natural limitations at Tring, it would not be appropriate to remove land from the Green Belt at Dunsley Farm for industrial and warehousing uses, which the town does not necessarily have the capacity to support.</p> <p>New allocations should be directed towards Hemel Hempstead, where the infrastructure can accommodate it and where the impact on the openness of the Green Belt is significantly lower.</p>
Northchurch Parish Council	Yes, but	Land should not be removed from green belt in anticipation of need.
Tring in Transition	No	<p>We do not support employment development at Dunsley Farm, Tring, because the inclusion of warehousing is inappropriate.</p> <p>There are a number of reasons. Appendix E in the SW Herts Economic Study 2016 lists many sites which were not assessed. Bourne End, which was assessed, was identified as having some space and is close to A41, but is not proposed for additional warehousing. The option to negotiate with Aylesbury Vale District Council re warehousing at College Road North two miles from Tring is flagged elsewhere in our response.</p>
Tring Town Council	No	At the macro level, there is no disagreement with the proposed approach to accommodate future jobs, but the emphasis on industrial and, in particular warehousing, is wrong.

		<p>More sustainable growth would be achieved at Dunsley Farm through commercial and light industrial/high tech businesses. This would also be more appropriate to the town gateway site.</p> <p>Tring School is an excellent source of local skills.</p>
Landowners and developers		
Capital and Regional plc. (owners of the Marlowes Centre, Hemel Hempstead)	No	See response to Question 21 above.
Gallagher Estates (developers of possible New Mill (Grove Road), Tring strategic site)	No	See response to Question 21 above.
Kier Property	No	<p>As stated in the consultation document, Dacorum is not commercially attractive for new office development. Accordingly, vacant sites such as Kier Park (Maylands Avenue, Hemel Hempstead), should be redeveloped for housing not retained for offices. Warehousing and Industrial uses are not appropriate at Kier Park, given the proximity to housing, so the employment allocation serves no purpose. The vacant nature of the site shows the lack of commercial interest for employment uses.</p> <p>The Council wish to see a tall building at Kier Park, on this gateway site, as shown in the pre-application response letter. Housing is the most achievable way to achieve this.</p>
General public		
		<p>Several members of the public expressed support for the views (see above) expressed by the following organisations:</p> <ul style="list-style-type: none"> • Berkhamsted Citizens' Association • Berkhamsted Town Council • Berkhamsted Residents' Action Group

		<ul style="list-style-type: none"> • Grove Fields Residents' Association (Tring)
		<p>Other main points made by the public:</p> <p>General comments</p> <ul style="list-style-type: none"> • There are no exceptional circumstances to justify using Green Belt, given: <ul style="list-style-type: none"> - the amount of existing vacant floorspace and land, for example at Maylands Gateway and Doolittle meadows (Apsley); and - the pace of technological change, including increased home working, which may reduce the need for employment land. • Green Belt sites should not be used in anticipation of need, only last a last resort if need is proven beyond doubt. • Existing vacant buildings and brownfield sites in urban areas should be used first. • The need for additional office floorspace has been over-estimated. <p>Site specific comments</p> <p>(i) HH-e1: Land East of A41 at Felden, Hemel Hempstead</p> <ul style="list-style-type: none"> • The site may be accessible to the A41, but the local area is congested and cannot take any more traffic. <p>(ii) TR-h5: Land at Dunsley Farm, London Road, Tring</p> <p>This site is unacceptable for employment development, because:</p> <ul style="list-style-type: none"> • The loss of this Green Belt land would harm an attractive gateway into the town, characterised by open fields, and the character of this small historic town.

		<ul style="list-style-type: none"> • Tring is not a suitable location for large scale industrial and warehousing development, particularly of large ‘sheds’. Other proposed sites in Hemel Hempstead, east of the A41 in Two Waters and at Maylands Gateway, are much more appropriate. • There is no need for new employment land in Tring, given the existing Icknield Way Industrial Estate and other existing and planned employment areas within a reasonable travelling time. • It would affect the setting of the Chilterns Area of Outstanding Natural Beauty (AONB) and Tring Park. Therefore, ARUP’s landscape appraisal should not have concluded that the site has only a ‘medium’ landscape sensitivity. • Dunsley Farm is the last remaining dairy farm in the area. • The site contains a local wildlife site. <p>(iii) KL-h3: Land to the east of A41 and Wayside Farm, Watford Road, Kings Langley</p> <p>This site is unacceptable for office development, because:</p> <ul style="list-style-type: none"> • The loss of this Green Belt land would damage the historic character of Kings Langley, visually harm the rural approach to the village and represent a major outward expansion of the village, extending Kings Langley to the M25 and closer to Watford. • There is no demand for offices at Kings Langley, as can be seen by the recent conversion of offices by the canal to housing and the amount of vacant office space nearby in Apsley. • Even if the proposed business park at East Hemel Hempstead in St Albans District fails, this would not be a reason to develop offices at Wayside Farm. • Wayside Farm is a working dairy farm, with a farm shop which sells produce including raw milk. There will be an increased need for agricultural lane after Brexit. • Wayside Farm has important ecological features – hedgerows with mature trees, as assessed for their Capital Asset Value for Amenity Trees (CAVAT).
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		<ul style="list-style-type: none">• The site contains a listed building and is close to a scheduled ancient monument, so there would be adverse effects on historic and cultural assets.• The public footpaths across Wayside Farm are well used.• There is already serious traffic congestion at M25 Junction 20, with long queues on the A41 and on the A4251 extending back into Kings Langley. Congestion occurs during much of the day, not just at peak periods.• Bus services are not very frequent and the location of the site means that not many people would walk or cycle there. Also, the trains are already overcrowded and will be unable to cope.
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APPENDIX 3: MEETING WITH DACORUM'S ECONOMIC DEVELOPMENT AND INFRASTRUCTURE TEAM

Note: The policy numbers and titles in the meeting notes below relate to an early internal version of the emerging Local Plan.

Meeting Notes

Draft Local Plan Internal Consultation

Economic Development and Infrastructure (Part 1)

10:30 30th January 2020

Attendees: Andrew Horner, John Chapman, Pennie Rayner, Lesley Crisp, Emma Cooper, Louise Baldwin, Mary Jeffrey, Shalini Jayasinghe (part only)

Policy DM38

This policy does not properly address the broadband issues; should be more supportive and promote delivery of the best available either directly or through suitable advance infrastructure (e.g. ducting).

Mixes up phone masts and broadband; should be separated out.

Connectivity is a key delivery requirement of Herts Innovation Quarter Enterprise Zone.

[Subsequent meeting held between PR, AH, AP and JG] and policy radically revised and broken into two parts to address delivery of connectivity and management of telecoms masts].

Lorry Park/Lorry Parking (no specific current policy/allocation)

Should be provided close to area of demand.

Big issue in Maylands as it is known as a "convenient" stop off for drivers of HGVs on the M1 who need to take a break in line with driving regulations (i.e. neither delivering nor collecting in Maylands); causes severe on street parking congestion for those with business in Maylands. Parking controls only shift the problem around Maylands.

New issues with freelance HGV drivers who own/operate a tractor unit waiting for a load (effectively live in Maylands during the week so they are available at very short notice).

Any lorry park would require basics amenities of toilets and somewhere to get food/meal.

LGV (White vans)

Essential to the operation of Maylands and must be catered for but:

Much unauthorised overnight parking (including in third party car parks)
Transfer of goods from one courier to another on street (causing congestion/obstruction).

Ongoing discussions between Economic Development and Amazon (in respect of LGVs associated with their warehouse).

Bucks CC have a Freight Strategy that includes LGVs; see link in separate e-mail from Pennie.

Any commercial vehicle parking option needs to include LGV and HGV options

Policies SP7 (Delivering land for office and industrial development) and DM10 (General employment areas)

Major shortage of smaller units to facilitate business growth, e.g. those wanting to move on from Maylands Business Centre and SMEs in general.

Businesses often wish to buy and develop a site rather than lease from a developer/investor (e.g. Prologis) but there are very few opportunities to purchase.

Demand for large office buildings/space is dissipating as nature of business change with more home working, agile working and use of technology (cf earlier points on broadband etc.).

Vacant office space is beginning to fill up now that owners are being more pragmatic and letting small sections of buildings rather than traditional approach of a whole floor or building.

This pattern of use needs to be addressed in any agreement with St Albans District Council (or others) to take some (or all) of DBC office need (possible issue for Statement of Common Ground).

Policy DM11 (Other employment sites)

Policy not required as its predecessor was rarely if ever used and there are few quality units/premises to protect.

Policy could be deleted.

May be merit in looking at a criteria based policy should a quality unit come forward for development outside a General Employment Area (GEA).

Policy DM14 (Rural economy)

Need to pick up on the NPPF balance on rural economy and take account of Green Belt and Chilterns area of Outstanding Natural Beauty.

Need to ensure that we positively address rural diversification to support farms/rural area/rural economy.

Policy DM16 (Tourism)

Liaison with Visit Herts required?

General Points on GEAs and possible allocations

General Economic Development support for relocation of the Council's Cupid Green depot.

Paradise Fields area: need to consider value/merit of a mixed use redevelopment to include office space.

Apsley Mills very close to station and may be suitable for new office development; consider retaining this GEA or could safeguard through revised DM11 (see above – criteria based policy).

Corner Hall site – possible ground floor office use (as suggested at Paradise Fields)

Frogmore Mill – still some employment floorspace (see separate e-mail from Mary for more detail); potential to safeguard?

Two Waters GEA – previously retained due to long lease and other issues; needs careful consideration.

Land East of A41, Hemel Hempstead – possible new site, offers good potential for smaller (SME friendly) units. Historic proposal to consider as a primary school but infrastructure and locational issues/constraints).

APPENDIX 4: DACORUM EMPLOYMENT LAND SUPPLY COMMITMENTS ON MAJOR SITES

The schedule below shows commitments on major sites (i.e. sites with committed gains or losses of over 1,000 m² of B class floorspace). The information in this appendix was compiled by:

- Taking the draft schedules of commitments at 1 April 2020.
- Adding commitments made since that date that the Council's officers are aware of.
- Excluding permissions that have now lapsed.

Floorspace figures for each commitment are included in columns 3-6 in the schedule only if the right hand column in the schedule indicates that development of the site is likely to take place.

Schedule of committed sites for gains or losses of B class floorspace

	Planning ref. (lapse date)	Floorspace change from 01.04.20				Comments	Is employment development likely during the Plan period?
		Offices		Industry, storage and distribution			
		Gain	Loss	Gain	Loss		
Hemel Hempstead							
1. Maylands Business Park							
2 Cherry Trees Court (former Catherine House), Boundary Way Site area: 0.44 ha.	00031/13					Permission granted for industrial building (Use Class B1, B2 and B8) containing 1,465m ² offices and 462m ² industrial floorspace. Some excavation works took place several years ago, so the permission can't lapse, but construction of the new building hasn't started.	No - the consented building seems unlikely to be built. However, industrial development on this site seems likely - see Appendix 5.

Unit 4, Prologis Park phase 1, Buncefield Lane, Maylands Gateway Site area: 13.1 ha.	01161/17			26,382		Site 3 (part) in the Maylands Gateway Development Brief (2013). Planning permission granted for a computer data centre for Gyron. Rest of Prologis Park phase 1: B1(c)/B2/B8 development completed under 4/00064/17/MFA.	Yes - under construction.
Prologis Park phase 2, Buncefield Lane, Maylands Gateway	01922/19			21,726		Site 3 (part) in the Maylands Gateway Development Brief (2013) Planning permission granted for flexible space (B1(c)/B2/B8 and ancillary offices.	Yes – site clearance works in progress.
Vantage House, Mark Road	01352/18/OPA (07/21)		-1,649			Prior approval granted for change of use from offices to residential (30 flats).	Yes.
Grovelands Business Centre, Grovelands	00557/17/OPA (03/21)		-4,266			Prior approval granted for change of use from offices to residential (56 flats).	Yes, although still in office use and prior approval lapses March 2021. Also, site now in an Article 4 area to control changes of use to housing.
Swallowdale Lane/Eastman Way Site area: 0.33 ha.	02493/18/ROC (01/22)	1,562				Planning permission granted for four office units on this undeveloped land.	Yes – the site has been marketed and a notice on the site stated that it was under offer.
Nexus House, Boundary Way	01588/18/OPA (09/21)		-1,273			Prior approval granted for change of use from offices to residential (26 flats).	Yes.
Former Keystone site, Boundary Way	02072/17/MFA and 00803/19			2,626		Planning permission 4/9272/17/MFA granted to J Murphy and Son (demolition contractors) for a B2/B8 unit with ancillary offices. Floorspace = 2,811 m ² .	Yes - under construction.

						Planning permission 4/00803/19/ROC reduced the footprint by 185 m ² .	
Cubic Building, Eastman Way	01615/18/MFA (12/21)			5,294	-6,100	Planning permission granted to redevelop this site.	Yes – completed since 31.03.20.
Parker House, Maylands Avenue	02172/19/OPA (11/22)		-2,342			<p>Prior approval granted for change of use of part of Parker House from offices to residential (30 flats).</p> <p>An earlier application for prior approval (4/01588/19/OPA) for change of use of the whole building to housing was refused. An application for a legal development certificate (4/20/02060/LDP) for office use of the whole building has been submitted since 31.03.20.</p>	Yes – the part of Parker House subject of 4/02172/19/OPA.
Spencer's Park phase 2, Three Cherry Trees Lane Site area: 1.77 ha.	02539/16/MOA			7,500		<p>This site forms the southern part of Local Plan employment proposal site E4. The Core Strategy shows the site as part of the Service Centre Character Zone (main uses: storage, distribution and warehousing).</p> <p>Outline planning permission granted for up to 7,500 m² of employment space (B1, B2, B8) as part of the Spencer's Park phase 2 housing led development.</p>	Yes.
Maylands Business Park: totals		1,562	-9,530	63,528	-6,100		
2. Hemel Hempstead town centre							

Hempstead House, Selden Hill	00193/18/OPA (03/21)		-2,438			Prior approval granted (4/00193/18/OPA) for change of use offices to residential (64 flats) and planning permission granted (4/01381/18) for extensions to provide a further 41 flats.	Yes – construction started since 31.03.20.
Charter Court, Midland Road	03861/19/OPA / (04/22) 19/03166/MFA (12/22)		-1,376			Prior approval granted for change of use from offices to residential (29 flats). Planning permission (4/01788/19/) since granted for alterations and a rooftop extension to provide 16 flats.	Yes.
Park House, Park Lane	01618/19/OPA (8/22) and 01788/19/MFA		-60			Prior approval granted for change of use from offices to residential (12 flats) and planning permission granted for alterations and a rooftop extension to provide 16 flats. A further application (4/20/02483/FUL) for retention of the offices with a rooftop extension for housing has been submitted since 31.03.20. This involves the loss of about 60 m ² offices (DBC estimate).	Yes – it is assumed that the current application is approved and implemented.
Hemel Hempstead town centre totals			-3,874				
3. Rest of Hemel Hempstead							
Clifton Court, Corner Hall	Nos. 1&4: 00383/16/OPA (04/19) No.5: 00329/17/OPA		-573			Prior approval granted (4/01306/13) for change of use all four office buildings at Corner Hall to residential (70 flats). Conversion to housing completed at Brindley House and Brunel Court offices). Telford House will remain in office use.	Yes.
			-200				

						Clifton Court: further prior approval applications approved for different parts of the building. Completed except at nos. 1 & 4 and 5.	
Nash House, 12 London Road	20/00388/OPA (05/23)		-600			<p>Prior approval granted since 31.03.20 for change of use from offices to residential (10 flats). Loss of office floorspace estimated by DBC.</p> <p>This site is regarded as a major site, although the loss of office floorspace is under 1,000 m², as 10 homes are proposed.</p>	Yes.
Rest of Hemel Hempstead: totals			-1,373				
Hemel Hempstead: totals		1,562	-14,777	63,528	-6,100		
Berkhamsted							
Berkhamsted: totals		-	-	-	-		
Tring							
Icknield Way, Tring	00958/18/MFA					<p>This site forms a small part of Local Allocation Site LA5, which is allocated for housing, employment and other uses in the Site Allocations DPD.</p> <p>A hybrid planning permission (4/00958/18/MFA) has been granted for the LA5 development, including outline</p>	No – housing development has started, but it is proposed to reallocate the employment part of LA5 for housing development in the new Local Plan - see Appendix 7.

						permission for 0.75 ha. of employment development.	
Akeman Business Park (including 72-80 and 81-82 Akeman Street) Site area: 0.8 ha.	01257/16/OPA (09/19) 02762/16/OPA (11/19) 00558/17/FUL 02857/17/FUL 00527/18/OTD 03111/18/OPA	47	-3,224			Designated as a GEA in the Site Allocations DPD (2017), but a range of non-residential mixed uses including social and community facilities is accepted, to reflect the Core Strategy. Various permissions granted, involving change of use and redevelopment to housing. Permission 00558/17 proposes an extension for office use.	Yes – housing development started since 31. 03.20.
Tring: totals		47	-3,224	-	-		
Kings Langley							
Rectory Poultry Farm, Gade Valley Close	02282/18/ MOA				-3,383	Outline planning permission granted to redevelop the site for housing, involving the loss of the existing industrial space.	Yes.
Kings Langley: totals					-3,383		
Markyate							
Hicks Road	01173/11					Mixed use redevelopment of most of site (1.9 ha.) for housing and other uses including employment has largely been completed, reflecting Hicks Road Masterplan (updated June 2012) and the Core Strategy's proposals for Strategic Site SS2. 1,052 m ² of industrial floorspace permitted under 4/01173/11 has not been built.	No – the rest of the development permitted under 4/01173/11 was completed some years ago. It seems unlikely that the permitted industrial floorspace will be built.

Markyate: totals		-	-	-	-		
Rest of Dacorum							
Lookers Land Rover, Langley Road, Chipperfield	02202/19/MFA				-1,216	Planning permission granted to demolish the existing building and construct 9 homes.	Yes – construction started since 31.03.20.
Home Farm, Great Gaddesden	00012/11					Alterations and change of use of agricultural buildings to offices and a meeting room permitted (gain of 1,578 m ² offices). 78 m ² completed 2013-14, 174 m ² completed 2014-15. 1,326 m ² not converted to offices.	No – there appears to have been no further works since 2014-2015, so conversion of the rest of the building seems unlikely.
Rest of Dacorum: totals		-	-	-	-1,216		
Dacorum: totals		1,609	-18,001	63,528	-10,699		
Dacorum: net floorspace change		-16,392		52,829			

APPENDIX 5: FURTHER POTENTIAL FOR GAINS AND LOSSES OF EMPLOYMENT FLOORSPACE ON SITES CONSISTENT WITH EXISTING POLICY

The table below shows further potential for floorspace gains and losses of B class employment floorspace in existing designated employment areas and allocations, and on other sites consistent with the Council’s current development plan documents.

Of the sites covered by the table, the first site is the only one that was assessed in the employment evidence base studies for the new Local Plan. This is because it is by far the largest site and the only greenfield one.

Maylands Business Park, Hemel Hempstead
Breakspear Way/Green Lane/Boundary Way, Maylands Gateway, Hemel Hempstead
<p>Site area:</p> <p>Area 1. Southern and eastern fields fronting Breakspear Way and Green Lane (6.0 ha) Area 2. Northern area fronting Boundary Way and Buncefield Lane (4.9 ha).</p>
<p>(i) Existing land use</p> <ul style="list-style-type: none"> • Area 1: Used for horse grazing. • Area 2: Caravan storage and Jack and Jill’s Nursery.
<p>(ii) Planning policy context and planning history</p> <p>Dacorum Borough Local Plan 1991-2011 (2004): The site is not in the Green Belt. However, it is designated under saved Policy 116 as open land, so is protected from building and other inappropriate development. Part of the site is also covered by other designations:</p> <ul style="list-style-type: none"> • C6: which safeguards land for cemetery use. • L7: which safeguard land for caravan uses. <p>Maylands Masterplan (2007): The southern part of area 1, fronting Breakspear Way was in the Maylands Gateway Character Zone. The masterplan stated that Maylands Gateway will be a first rate business park, with some technology sector focus, and containing HQ offices, conference facilities and a hotel.</p> <p>Dacorum Core Strategy (2013): The site is in the Maylands Gateway Character Zone (see Policy CS34 and Figures 18 and 22). HQ offices and other complementary uses are proposed in Maylands Gateway.</p> <p>Maylands Gateway Development Brief (2013): This document gives more flexibility on future uses than the Core Strategy. Acceptable uses include high quality B8 developments.</p> <p>Dacorum site Allocations (2017): North East Hemel Hempstead not covered by Site Allocations.</p> <p>Dacorum Local Plan Issues and Options Consultation (2017): Paragraph 7.33 in the consultation document summarised the conclusions of the Dacorum Employment Land Availability Assessment on land for industrial and warehousing uses, including the recommendation for such development at Maylands Gateway (see ‘evidence base studies’</p>

below). Paragraph 7.34 stated that the Council considered it sensible to accept the recommendations of the land availability assessment.

Planning history: None relevant.

(iii) Evidence base studies

Dacorum Employment Land Availability Assessment (2017): The site is assessed on pages 216-219. Main points:

Site ref: M13 Maylands Gateway (part)

Description: vacant land (note: not stated in the ELAA, but also includes a cemetery, caravan storage site and nursery).

Should existing employment use be safeguarded? Yes. Note: This recommendation relates to a different part of M13 (Breakspear Park).

In the main body of the report, chapter 4 provides a property market profile and paragraph 4.44 states that:

“...There is more uncertainty regarding the delivery of new offices at Hemel Hempstead Gateway. Although the site has good public transport links with the train station. Rents at the Gateway site will need to be significantly higher than what is currently being achieved in the Hemel Hempstead market unless residential is used to cross-subsidise or a significant pre-let is secured. The latter is unlikely because our market analysis has not shown that there is occupier interest in the current market for a significant pre-let.”

Paragraph 4.81 states that the Council owned land at Maylands Gateway is likely to meet some of the demand for large sheds of circa 9,300 sq m.

Paragraph 5.22 states that the Maylands Gateway allocation (including the Council owned land) is assumed as having potential for intensification as an industrial location, with some potential for office development but only at the end of the plan period. 20,000 sq m of offices and 68,700 sq m of industrial space is assumed.

Paragraph 5.41 summarised the position regarding Maylands Gateway as follows:

“...there is substantial vacant land (and vacant floorspace) at Maylands Gateway which the market is unlikely deliver for offices. In our view, relying on Maylands Gateway as the main supply of future office floorspace would be a risky strategy for the Council to adopt, given the high level of office vacancy within the existing stock and the fact that land that has been allocated for office development for a long time has yet to come forward for development. The view of the market is that this is unlikely to change unless an extraordinary level of intervention takes place to improve its public transport accessibility so that it can compete with established more successful office hubs.”

Paragraph 6.11 advised that the assumption that some 20,000 sqm of office floorspace will come forward within the Maylands Gateway allocation should be treated with a degree of caution.

Finally, paragraph 7.27 recommended relaxing the allocations on the undeveloped land in Maylands Gateway to allow industrial uses, including potentially strategic warehousing, as well as offices.

South West Hertfordshire Economic Study Update (2019): The site is assessed in Appendix D, paragraphs D.1-D.9. Key points:

Conclusion: The site benefits from strong access to the strategic road network. Demand will likely be for new logistics and local light industrial floorspace. Given the site profile and access it can meet short to medium term demand for employment development for B8 distribution and local light industrial. Office development is unlikely.

There are several references to Maylands Business Park and Maylands Gateway in the report. Key points:

Office market: High quality amenities and access to a rail station are key requirements for attracting high value office occupiers. This explains why Maylands has a large supply of office space, but has seen limited demand due to its poor public transport connections. Prime office rents have been increasing at Maylands, although they are not yet at a level where new development is viable.

Industrial market: In the industrial market, access to the strategic road network is the key requirement of strategic industrial occupiers and also for medium sized units. The industrial market in South West Hertfordshire is dominated by Maylands. This is the case both with large units (over 9,290 sq m) which tend to be strategic warehouses and also for medium units (1,859-9,290 sq m).

Hertfordshire Innovation Quarter Enterprise Zone (Hertfordshire IQ): The site is within the Enterprise Zone, where the Hertfordshire Local Enterprise Partnership (LEP) is aiming to attract green technology businesses and investment.

(iv) Other relevant factors

This site probably represents the best chance in the whole of Maylands Business Park of securing a significant new office development, although even here office rents would have to increase further if this is to happen. The Breakspear Way frontage is prominently located and is suitable for landmark HQ offices.

(v) Liaison with landowners

Owners: DBC

Landowner meetings: None

Council's intentions as landowner:

Area 1: The Council is negotiating with a potential purchaser of the site.

Area 2: The existing uses provide the Council with an income and there is no current intention to sell the land for development.

(vi) Prospects for employment floorspace change during Plan period

Area 1: Employment development expected.

Area 2: Not expected in the foreseeable future.

<p>(vii) Should the Local Plan allocate the site as an employment Growth Area?</p> <p>Yes, but only Area 1.</p> <p>Local Plan Emerging Strategy for Growth reference: Proposals and Sites section - Growth Area HH20, proposed office, industrial and storage or distribution uses (providing around 48,000 m² offices, 24,000 m² industrial space or a mix of the two) consisting of green technological uses consistent with the aims of the Herts IQ Enterprise Zone. The southern part of the site fronting Breakspear Way should be developed for offices, unless marketing shows that there is no commercial interest in such development.</p>
<p>(viii) Estimated employment floorspace</p> <p>Area 1: assume 24,000 m² Industrial development, although a mix of industrial and office development is preferred.</p> <p>Area 2: assume no employment development, but could accommodate around 19,600 m² industrial development if made available for development in the future.</p>
<p>2 Cherry Tree Court (former Catherine House) Boundary Way</p>
<p>Site area: 0.44 ha.</p>
<p>(i) Existing land use: Vacant land.</p>
<p>(ii) Planning policy context and planning history</p> <p>Dacorum Borough Local Plan 1991-2011 (2004): the site is located in the Maylands General Employment Area (GEA). Saved Policy 31 proposes the following uses in this GEA: business, industry, storage and distribution.</p> <p>Maylands Masterplan (2007): located in the Service Centre character area – see ‘Core Strategy’ below.</p> <p>Dacorum Core Strategy (2013): the site is in the Service Centre Character Zone The Service Centre, where storage, distribution and warehousing are expected to continue to be the main uses (see Policy CS34 and Figures 18 and 22).</p> <p>Dacorum site Allocations (2017): North East Hemel Hempstead not covered by Site Allocations.</p> <p>Planning history: Appendix 4 explains that planning permission 4/00031/13 for employment development on this site cannot lapse, but that the consented building seems unlikely to be built.</p>
<p>(iii) Prospects for employment floorspace change during Plan period</p> <p>Industrial development likely.</p>
<p>(iv) Should the Local Plan allocate the site as an employment Growth Area?</p> <p>No, as the site already has planning permission for employment development.</p>

<p>(v) Estimated employment floorspace</p> <p>1,800 sq. m industrial floorspace, based on a plot ratio of 0.4 as recommended in the South West Hertfordshire Economic Study Update (2019).</p>
<p>Maylands Avenue/Wood Lane End/Duxons Turn (south west)</p> <p>(Heart of Maylands Sites 4 and 6)</p>
<p>Site area: 1.1 ha. split between Sites 4 and 6 in the Heart of Maylands Development Brief.</p> <p>Site 4 (Maylands Avenue/Wood Lane End/Duxons Turn): 0.7 ha. Site 6 (Duxons Turn): 0.4 ha.</p>
<p>(i) Existing land use</p> <p>Site 4: Mixed A and B-class uses, motor trade uses and a public car park. Site 6: Industrial.</p>
<p>(ii) Planning policy context and planning history</p> <p>Dacorum Borough Local Plan 1991-2011 (2004): The site is located in the Maylands Avenue GEA. Saved Policy 31 proposes the following uses in this GEA: business (core office location).</p> <p>Maylands Masterplan (2007): section 2.3 in the masterplan proposed that the Heart of Maylands will become the functional centre of Maylands, providing shops, cafes, restaurants, business services, community facilities, open space and access to public transport. The masterplan also encouraged office and residential use on upper floors.</p> <p>Heart of Maylands Development Brief (2010): the brief sub-divided the Heart of Maylands into six sites. The indicative design concept shows mixed retail, leisure, office and residential uses on Site 4. There are no proposals for Site 6.</p> <p>The brief recognised that this site will be complex to deliver, given the multiple small ownerships.</p> <p>Dacorum Core Strategy (2013)</p> <p>Policy CS34 proposed a local centre in the Heart of Maylands to support residents and workers. Further guidance was provided in Figure 18 on the range of future uses, including financial and commercial services.</p> <p>Dacorum site Allocations (2017): North East Hemel Hempstead not covered by Site Allocations.</p> <p>Planning history: None relevant on sites 4 and 6.</p>
<p>(iii) Other relevant factors</p> <p>The site is in multiple ownerships (including the Council owned car park), mostly freehold, but some leased out. No discussions have taken place during the preparation of the Local Plan about a possible redevelopment scheme.</p>

<p>(iv) Prospects for employment floorspace change during Plan period</p> <p>Uncertain - no current redevelopment proposals. Longer-term prospects for redevelopment are uncertain. Also, uncertainty over mix of uses in a redevelopment scheme.</p>
<p>(v) Should the Local Plan allocate the site as an employment Growth Area?</p> <p>No, given the uncertain prospects for redevelopment.</p>
<p>(vi) Estimated employment floorspace</p> <p>Redevelopment of the site would involve the loss of some existing industrial space and possibly the creation of some new office floorspace on upper floors.</p> <p>However, assume no floorspace change given the uncertain prospects for redevelopment.</p>
<p>35-37 Wood Lane End</p> <p>(Heart of Maylands, Site 5)</p>
<p>Site area: 0.15 ha.</p>
<p>(i) Existing land use</p> <p>Former banks - currently in mixed commercial/retail use.</p>
<p>(ii) Planning policy context and planning history</p> <p>Dacorum Borough Local Plan 1991-2011 (2004): The site is located in the Maylands Avenue GEA. Saved Policy 31 proposes the following uses in this GEA: business (core office location).</p> <p>Maylands Masterplan (2007): section 2.3 in the masterplan proposed that the Heart of Maylands will become the functional centre of Maylands, providing shops, cafes, restaurants, business services, community facilities, open space and access to public transport. The masterplan also encouraged office and residential use on upper floors.</p> <p>Heart of Maylands Development Brief (2010): Identified as site 5 in the brief. There are no proposals for this site.</p> <p>The brief recognises that this site will be complex to deliver, given the multiple small ownerships.</p> <p>Dacorum Core Strategy (2013): Policy CS34 proposed a local centre in the Heart of Maylands to support residents and workers. Further guidance was provided in Figure 18 on the range of future uses, including financial and commercial services.</p> <p>Dacorum site Allocations (2017): North East Hemel Hempstead not covered by Site Allocations.</p> <p>Planning history: None relevant.</p>
<p>(iii) Other relevant factors</p> <p>Existing development is single storey and there is scope for a taller building.</p>

<p>(iv) Prospects for employment floorspace change during Plan period</p> <p>Uncertain - no current redevelopment proposals. Longer-term prospects for redevelopment are uncertain. Also, uncertainty over mix of uses in a redevelopment scheme.</p>
<p>(v) Should the Local Plan allocate the site as an employment Growth Area?</p> <p>No, given the uncertain prospects for redevelopment.</p>
<p>(vi) Estimated employment floorspace</p> <p>If the site is redeveloped, there might be some offices on upper floors. However, assume no floorspace change given the uncertain prospects for redevelopment.</p>
<p>Kier Park, Maylands Avenue</p>
<p>Site area: 1.0 ha.</p>
<p>(i) Existing land use: Vacant land.</p>
<p>(ii) Planning policy context and planning history</p> <p>Dacorum Borough Local Plan 1991-2011 (2004): The site is located in the Maylands Avenue GEA. Saved Policy 31 proposes the following uses in this GEA: business (core office location).</p> <p>Maylands Masterplan (2007): within the Maylands Gateway character area, where a first rate business park was proposed.</p> <p>Dacorum Core Strategy (2013): The site forms part of the Maylands Gateway Character Zone (see Policy CS34 and Figures 18 and 22). HQ offices and other complementary uses are proposed in Maylands Gateway.</p> <p>Maylands Gateway Development Brief (2013): This document gives more flexibility on future uses than the Core Strategy. Acceptable uses include high quality B8 developments.</p> <p>Dacorum site Allocations (2017): North East Hemel Hempstead not covered by Site Allocations.</p> <p>Planning history: Planning permission (4/02124/08) granted for hotel, A3/A5 uses and offices (6,455 m²). Hotel (Travelodge) and A3/A5 uses built, so permission cannot lapse. Offices unlikely to be built.</p> <p>Application 4/02286/18/MFA for 268 flats and 1,404 m² offices refused, but not on land use principle grounds. Appeal lodged.</p>
<p>(iii) Other relevant factors: None.</p>
<p>(iv) Prospects for employment floorspace change during Plan period</p> <p>Mixed housing and office development expected.</p>
<p>(v) Should the Local Plan allocate the site as an employment Growth Area?</p> <p>Yes.</p>

Local Plan Emerging Strategy for Growth reference: Proposals and Sites section - Growth Area HH18, proposed for housing and offices (around 1,400 m ² floorspace).		
(vi) Estimated employment floorspace		
1,400 m ² offices.		
Maylands Business Park: estimated employment floorspace totals	Offices: 1,400 m ²	Industrial: 25,800 m ²
Hemel Hempstead town centre: No sites		
Rest of Hemel Hempstead		
Frogmore Road		
Site area		
Area 1 (adjacent to Durrants Hill Road): Area 2 (Frogmore Road south east end): 1.17 ha.		
(i) Existing land use		
Area 1: Ebbens Bathroom Centre (not an employment use). Area 2: Industrial.		
(ii) Planning policy context and planning history		
Dacorum Site Allocations (2017): Forms part of allocated housing site H/13.		
Planning history: None relevant.		
(iii) Other relevant factors: The central part of the H/13 site is currently being developed for housing .		
(iv) Prospects for employment floorspace change during Plan period		
Area 1: Existing use likely to remain. Area 2 : Redevelopment for housing expected, with loss of existing employment buildings.		
(v) Should the Local Plan allocate the site as an employment Growth Area?		
No, but Area 2 should continue to be allocated for housing development.		
Local Plan Emerging Strategy for Growth reference: Proposals and Sites section - Growth Area HH13, proposed for housing.		
(v) Estimated employment floorspace		
Redevelopment of Area 2 would result in the loss of B class floorspace. Estimated loss is approximately 2,000 m ² offices and 5,000 m ² industrial space.		

Ebberns Road
Site area: 0.38 ha.
(i) Existing land use: industrial (two industrial/warehousing buildings).
<p>(ii) Planning policy context and planning history</p> <p>Ebberns Road, Hemel Hempstead, Development Brief (2003): The brief proposed redevelopment of various industrial uses for housing. It supplemented the housing allocation for this area in the Dacorum Local Plan 1991-2011.</p> <p>Dacorum Site Allocations (2017): Allocated for housing development – part of site H/4.</p> <p>Planning history: None relevant.</p>
<p>(iii) Other relevant factors</p> <p>The site is the only part of the area proposed for housing in the Ebberns Road Development Brief and the only part of housing site H/4 that is still in industrial use.</p>
<p>(iv) Prospects for employment floorspace change during Plan period</p> <p>No current redevelopment proposals, but redevelopment for housing likely during Plan period.</p>
<p>(v) Should the Local Plan allocate the site as an employment Growth Area?</p> <p>No, it should continue to be allocated for housing development.</p> <p>Local Plan Emerging Strategy for Growth reference: Proposals and Sites section - Growth Area HH15, proposed for housing.</p>
<p>(vi) Estimated employment floorspace</p> <p>Loss of the remaining industrial floorspace: estimated loss = 2,700 m².</p>
233 London Road, Hemel Hempstead
Site area: 0.1 ha.
(i) Existing land use: motor trade (Apsley Motors).
<p>(ii) Planning policy context and planning history</p> <p>Dacorum Site Allocations (2017): allocated for housing development – site H/8.</p> <p>Planning history: None relevant.</p>
(iii) Other relevant factors: none.
<p>(iv) Prospects for employment floorspace change during Plan period</p> <p>Redevelopment for housing use likely.</p>

(v) Should the Local Plan allocate the site as an employment Growth Area?		
No, it should continue to be allocated for housing development.		
Local Plan Emerging Strategy for Growth reference: Proposals and Sites section - Growth Area HH14, proposed for housing.		
(vi) Estimated employment floorspace		
Floorspace loss: 400 sq m industrial estimated.		
Rest of Hemel Hempstead: estimated employment floorspace totals	Offices: -2,000 m ²	Industrial: -8,100 m ²
Hemel Hempstead: estimated employment floorspace totals	Offices: -600 m ²	Industrial: 17,700 m ²
Berkhamsted	No sites	
Tring		
Western Road, Tring		
Site area: 0.47 ha.		
(i) Existing land use: Industrial.		
(ii) Planning policy context and planning history		
<p>Concept statement for Western Road, Tring (2006): The brief proposed redevelopment of various industrial uses for housing. It supplemented Policy 33 in the Dacorum Local Plan 1991-2011. The site forms part of the concept statement area.</p> <p>Dacorum Site Allocations (2017): Allocated for housing development – site H/16).</p> <p>Planning history: None relevant.</p>		
(iii) Other relevant factors		
Part of the are proposed for housing in the concept statement has been redeveloped for housing, leaving only the H/16 site in industrial use.		
(iv) Prospects for employment floorspace change during Plan period		
No current redevelopment proposals, but redevelopment may take place during Plan period.		
(v) Should the Local Plan allocate the site as an employment Growth Area?		
No, the site may be redeveloped for housing in the future but is not proposed as a housing Growth Area due to the uncertain development prospects.		

(vi) Estimated employment floorspace		
If the site is redeveloped, the existing industrial floorspace would be lost (estimated loss = 3,000 m ² . However, assume no floorspace change given the uncertain prospects for redevelopment.		
Tring: estimated employment floorspace totals	Offices: none.	Industrial: none.
Bovingdon	No sites.	
Kings Langley	No sites.	
Markyate		
Corner of Hicks Road / High Street		
Site area: 0.1 ha.		
(i) Existing land use: retail and motor trade.		
(ii) Planning policy context and planning history		
Dacorum Site Allocations (2017): no site specific proposal.		
Planning history: None relevant.		
(iii) Other relevant factors: none.		
(iv) Prospects for employment floorspace change during Plan period		
No current redevelopment proposals, but redevelopment for housing likely during Plan period.		
(v) Should the Local Plan allocate the site as an employment Growth Area?		
No, it should be allocated for housing development.		
Local Plan Emerging Strategy for Growth reference: Proposals and Sites section - Growth Area Mk02, proposed for housing.		
(vi) Estimated employment floorspace		
Loss of the existing industrial floorspace. Estimated loss = 400 m ² .		
Watling Street (rear of Hicks Road/High Street)		
Site area: 0.27 ha.		
(i) Existing land use: Industrial.		
(ii) Planning policy context and planning history		
Hicks Road Masterplan (updated 2012): The masterplan proposed mixed use housing led redevelopment of industrial land in the Hicks Road area. The site forms part of the masterplan area.		

<p>Dacorum Core Strategy (2013): Strategic Site SS2 - proposed mixed use housing led redevelopment of industrial land in the Hicks Road area, as in the masterplan.</p> <p>Dacorum Site Allocations (2017): Allocated for housing development – site H/20).</p>		
<p>(iii) Other relevant factors</p> <p>Most of the masterplan/SS2 site has been redeveloped under permission 4//01173/11/MFA. However, the H/20 site was not covered by this permission.</p>		
<p>(iv) Prospects for employment floorspace change during Plan period</p> <p>No current redevelopment proposals, but redevelopment for housing likely during Plan period.</p>		
<p>(v) Should the Local Plan allocate the site as an employment Growth Area?</p> <p>No, it should continue to be allocated for housing development.</p> <p>Local Plan Emerging Strategy for Growth reference: Proposals and Sites section - Growth Area Mk03, proposed for housing.</p>		
<p>(vi) Estimated employment floorspace</p> <p>Loss of the existing industrial floorspace. Estimated loss = 1,100 m².</p>		
Markyate: estimated employment floorspace totals	Offices: None.	Industrial: -1,500
Countryside	No sites.	
Dacorum: estimated employment floorspace totals	Offices: -600 m ²	Industrial: -16,20.....0

APPENDIX 6: REVIEW OF GENERAL EMPLOYMENT AREAS AND OTHER LAND DESIGNATED FOR EMPLOYMENT USE

This appendix looks at all Dacorum’s existing General Employment Areas (GEAs) and other land designated for office or industrial uses.

The Dacorum Employment Land Availability Assessment (ELAA), published in 2017 and the South West Hertfordshire Economic Study Update (2019) identify a need for more employment land and recommend that most of the existing employment land should be retained. Therefore, the table below concludes that existing employment areas should be deleted or reduced in size only where there is a very strong case for making such a change in the new Local Plan.

In reaching conclusions, the Council has also taken into account the potential for identifying new land for employment development in the Local Plan (see Appendices 7 and 8).

The table below is sub-divided as follows:

1. North East Hemel Hempstead. This part of the Borough is not covered in the Site Allocations Development Plan Document (2017), so the areas considered are the GEAs allocated in saved Policy 31 the Dacorum Borough Local Plan 1991-2011 (adopted 2004) and other land designated for employment use in the Dacorum Core Strategy (2013).
2. Site Allocations Development Plan Document (DPD). The areas considered are the GEAs allocated under Site Allocations Policy SA5, the employment areas in the Green Belt allocated under Policy SA6 and a business use led mixed use proposal (Paradise/Wood Lane).

NORTH EAST HEMEL HEMPSTEAD (NOT COVERED IN SITE ALLOCATIONS DPD)
Breakspear Park, Hemel Hempstead
Site area: 7.8 ha.
(i) Planning policy context
Dacorum Borough Local Plan 1991-2011 (2004)
The guidance on the site in the table of General Employment Areas in saved Policy 31 includes:
Proposed uses: Business (core office location)
Other key points: Particularly suited to office use. Safeguard hotel use

Maylands Masterplan (2007)

Within the Maylands Gateway character area, where a first rate business park was proposed.

The Maylands Gateway Development Brief (2013)

The brief gives more flexibility on future uses than the Core Strategy. Acceptable uses include high quality B8 developments.

Dacorum Core Strategy (2013)

Forms part of the Maylands Gateway Character Zone, where HQ offices and other complementary uses are proposed (see Core Strategy Policy CS34 and Figures 18 and 22).

Dacorum site Allocations (2017): North East Hemel Hempstead not covered by Site Allocations.

(ii) Evidence base studies**South West Hertfordshire Economic Study (2016)**

Site Assessment – paragraphs 8.8-8.17

Recommendation: Strategically important employment area of regional significance. The area provides a considerable amount of large floorplate units in all B-Class uses. Demand for office accommodation at Maylands is not as strong as for other B-Class uses and there is a considerable amount of land allocated for office uses which have been available for some time. Demand for industrial and warehouse and distribution uses is strong and this is the premier location for such uses in the sub-region. There is considerable room for expansion of employment uses at the Gateway site, which we would recommend should be supported for future expansion of the industrial area. The site would be suitable for a variety of employment uses and any development of the site should be employment-led.

Dacorum Employment Land Availability Assessment (2017)

Site Assessment - Appendix C pages 141-144, site ref: M13 (part)

Description: Flagship offices (Breakspear Park) and a hotel.

Should existing employment use be safeguarded? Yes. Recently refurbishment means there is prime office space available - should be retained.

See Appendix A for site plan.

South West Hertfordshire Economic Study Update (2019): Not assessed.

(iii) Other relevant factors

The Breakspear Park offices (but not the hotel and filling station) are in an Article 4 area. This means planning applications are required for changes of use from offices to housing.

(iv) New Local Plan: conclusion

Retain GEA designation in the new Local Plan given the ELAA assessment - include in a GEA covering the whole of Maylands Business Park.

Local Plan Emerging Strategy for Growth reference: Policy DM16 – see guidance on Maylands Business Park in Table 19. Breakspear Park should be retained as offices (as in Dacorum Borough Local Plan).

(v) Estimated employment floorspace change

None.

Buncefield, Hemel Hempstead

Site area: 26.1 ha.

(i) Planning policy context

Dacorum Borough Local Plan 1991-2011 (2004)

The guidance on the site in the table of General Employment Areas in saved Policy 31 includes:

Proposed uses: Storage and distribution, oil terminal

Other key points: Existing hazardous development will constrain further development.

Dacorum Core Strategy (2013)

Most of the area is shown as Buncefield Oil Depot (see Figure 22).

The SW corner is in the Service Centre Character Zone, where storage, distribution and warehousing are expected to continue to be the main uses (see Figures 18 and 22).

Dacorum site Allocations (2017): North East Hemel Hempstead not covered by Site Allocations.

(ii) Evidence base studies

South West Hertfordshire Economic Study (2016): See under 'Breakspear Park' above.

Dacorum Employment Land Availability Assessment (2017)

Site Assessment – Appendix C pages 125-132, site refs:
M4 Service Centre South (part); and
M6 Buncefield Oil Depot

Description:

M4 (part): strategic storage and distribution facilities.

M6: large oil storage facilities and storage and distribution units.

Should existing employment use be safeguarded? Yes.

See Appendix A for site plans.

South West Hertfordshire Economic Study Update (2019): Not assessed.

(iii) Other relevant factors

The extent of the Buncefield oil terminal is now less than shown in the 2004 Local Plan – some of the former oil terminal land has been redeveloped for B class employment uses.

(iv) New Local Plan: conclusion

Retain GEA designation in the new Local Plan given the ELAA assessment. However, the Buncefield GEA should be reduced in size to reflect the present extent of the oil terminal within Dacorum.

The land no longer in oil terminal use should be included in a GEA covering the whole of Maylands Business Park.

Local Plan Emerging Strategy for Growth reference: Policy DM16 – see guidance on Buncefield GEA. Employment uses: Oil terminal, as in Dacorum Borough Local Plan.

(v) Estimated employment floorspace change

None.

Maylands, Hemel Hempstead

Site area: 59.1 ha.

(i) Planning policy context

Dacorum Borough Local Plan 1991-2011 (2004)

The guidance on the site in the table of General Employment Areas in saved Policy 31 includes:

Proposed uses: Business, industry, storage and distribution

Other key points: Proximity to hazardous substances at Buncefield Oil Terminal and Three Cherry Trees Lane may restrict development. The Hertfordshire Waste Local Plan identifies land for existing and proposed waste uses.

Maylands Masterplan (2007)

The area falls within four character areas, as stated under 'Core Strategy' below.

Dacorum Core Strategy (2013)

This area is in four character zones (see Figures 18 and 22):

- The Service Centre, where storage, distribution and warehousing are expected to continue to be the main uses.
- The Engine Room, which should continue to offer a mix of industrial and commercial uses, as well as more flexible business uses.
- The Face of Maylands, which is expected to be a core office location. There is scope for general industrial, storage and distribution uses in less prominent areas.
- Maylands Gateway, where HQ offices and other complementary uses are proposed (only Local Plan employment proposal site E2 is in this zone).

Dacorum site Allocations (2017): North East Hemel Hempstead not covered by Site Allocations.

(ii) Evidence base studies

South West Hertfordshire Economic Study (2016): See under 'Breakspear Park' above.

Dacorum Employment Land Availability Assessment (2017)

Site Assessment - Appendix C pages 125-128 and 133-144, site refs:

M4 Service Centre South (part);

M8 Mark Road;

M9 Engine Room east;

M12 Face of Maylands (part); and

M13 Maylands Gateway (part)

Description:

M4 (part): strategic storage and distribution facilities, business parks and medical centre. The north part has some open storage.

M8: mixed uses, including offices, trade counters and vehicle repair.

M9: large storage and distribution facilities and business parks.

M12 (part): includes large HQ offices and storage and distribution.

Should existing employment use be safeguarded? Yes.

See Appendix A for site plans.

South West Hertfordshire Economic Study Update (2019): Not assessed.

(iii) Other relevant factors

Most of the area is in an Article 4 area. This means planning applications are required for changes of use from offices and some light industrial and warehouse buildings to housing. The land close to Buncefield Oil Depot is excluded from the Article 4 area as the prior approval regime does not apply there.

Part of the car park for FFEI Life Sciences is not in the GEA (it is shown as open land on the policies map).

The southern part of Mark Road is used for retail and food and drink uses. This area functions as part of the Maylands local centre.

(iv) New Local Plan: conclusion

Retain GEA designation in the new Local Plan given the ELAA assessment - include in a GEA covering the whole of Maylands Business Park.

Expand the GEA to include all the FFEI site.

Exclude the southern part of Mark Road and include in the Maylands local centre.

Local Plan Emerging Strategy for Growth references:

- Policy DM16 - see guidance on Maylands Business Park in Table 19. Employment uses: offices, industrial, warehousing, as in Dacorum Borough Local Plan.
- Policy DM19 – for mix of uses in Maylands local centre.
-

(v) Estimated employment floorspace change

None.

Maylands Avenue, Hemel Hempstead

Site area: 26.9 ha

(i) Planning policy context

Dacorum Borough Local Plan 1991-2011 (2004)

The guidance on the site in the table of General Employment Areas in saved Policy 31 includes:

Proposed uses: Business (core office location)

Other key points: Prestige business area to be enhanced. Hotel an acceptable use.

Maylands Masterplan (2007)

The area was divided between three character areas, as explained under ‘Core Strategy’ below.

Heart of Maylands Development Brief (2010)

The brief's aim was for the Heart of Maylands (around the Maylands Avenue/Wood Lane End crossroads) to become a strong functional local centre for the businesses and employees working in Maylands Business Park.

The Maylands Gateway Development Brief (2013)

The SE corner of the area was covered by the brief, which gave more flexibility on future uses than the Core Strategy (see below). Acceptable uses included high quality B8 developments.

Dacorum Core Strategy (2013)

Policy CS34 and Figures 18 and 22 show the following:

- The majority of the area is in the Face of Maylands Character Zone, which is expected to be a core office location. There is scope for general industrial, storage and distribution uses in less prominent areas.
- Part of this area formed the Heart of Maylands Character Zone, where a new local centre was proposed.
- The SE corner of the area is in the Maylands Gateway Character Zone, where HQ offices and other complementary uses were proposed.

Dacorum Site Allocations (2017): North East Hemel Hempstead not covered by Site Allocations.

(ii) Evidence base studies

South West Hertfordshire Economic Study (2016): See under 'Breakspear Park' above.

Dacorum Employment Land Availability Assessment (2017)

Site Assessment - Appendix C pages 141-144, site refs:

M12 Face of Maylands (part)

M13 Maylands Gateway (part)

Description:

M12 (part): includes large HQ offices and storage and distribution.

M13 (part): flagship offices (Breakspear Park), a hotel and vacant land.

Should existing employment use be safeguarded? Yes.

See Appendix A for site plans.

South West Hertfordshire Economic Study Update (2019): Not assessed.

(iii) Other relevant factors

A substantial amount of redevelopment has taken place in the Heart of Maylands area, in accordance with the development brief, including Maylands Plaza (local centre) scheme.

Part of the area is in an Article 4 area. This means planning applications are required for changes of use from offices and some industrial and warehouse buildings to housing.

Parker House: before the Article 4 area became operational, prior approval (4/01588/19/OPA) granted for part change of use offices to residential.

The rest of this area is excluded from the Article 4 area, as it is largely in non-employment uses. The area outside the Article 4 area includes:

- Kier Park: a planning application (4/02286/18/MFA) for 268 flats and 1,405 m² offices refused, but not on land use planning grounds. Appeal lodged.

- Prologis Park phase 2: planning permission (4/01922/19/MFA) granted for 21,700 sq. metres of industrial floorspace.

(iv) New Local Plan: conclusion

Retain GEA designation in the new Local Plan for:

- The land within the Article 4 area
- The Prologis Park phase 2 site.
- Kier Park

Delete the Heart of Maylands area and Aldi/Costa/McDonald's from the GEA, as they are largely in non-employment uses, and include in the Maylands local centre.

Local Plan Emerging Strategy for Growth references:

- Policy DM16 - see guidance on Maylands Business Park in Table 19. Employment uses: offices, industrial, warehousing, as in Dacorum Borough Local Plan.
- Policy DM19 – for mix of uses in Maylands local centre.

(v) Estimated employment floorspace change

Limited further loss over and above that already permitted likely.

Prologis Park (part), Maylands Gateway, Hemel Hempstead

Note: covers the part of Prologis Park (phases 1 and 2) not within Maylands and Maylands Avenue GEAs.

Site area:

(i) Planning policy context

Dacorum Borough Local Plan 1991-2011 (2004)

The site is designated as a GEA, but is not in the Green Belt. It is designated under saved Policy 116 as open land, so is protected from building and other inappropriate development. Part of the site is also safeguarded for touring camping and caravan use through proposal L6 in the Schedule Of Leisure And Tourism Proposal Sites.

Maylands Masterplan (2007)

Within the Maylands Gateway character area, where a first rate business park was proposed.

Dacorum Core Strategy (2013)

The site forms part of the Maylands Gateway Character Zone (see Policy CS34 and Figures 18 and 22). HQ offices and other complementary uses are proposed in Maylands Gateway.

Maylands Gateway Development Brief (2013)

This document gives more flexibility on future uses than the Core Strategy. Acceptable uses include high quality B8 developments.

Dacorum Site Allocations (2017): North East Hemel Hempstead not covered by Site Allocations.

Dacorum Local Plan Issues and Options Consultation (2017)

Paragraph 7.33 in the consultation document summarised the conclusions of the Dacorum Employment Land Availability Assessment on land for industrial and warehousing uses, including the recommendation for such development at Maylands Gateway (see 'evidence base studies' below). Paragraph 7.34 stated that the Council considered it sensible to accept the recommendations of the land availability assessment.

(ii) Evidence base studies

South West Hertfordshire Economic Study (2016): See under 'Breakspear Park' above.

Dacorum Employment Land Availability Assessment (2017)

Site Assessment: Appendix C, 216-219, site ref: M13 Maylands Gateway (part)

Description: vacant land.

Should existing employment use be safeguarded? Yes. **Note:** This recommendation relates to a different part of M13 (Breakspear Park).

Paragraph 5.22 in the ELAA stated that the Maylands Gateway allocation was assumed as having potential for intensification as an industrial location, with some potential for office development but only at the end of the plan period. 20,000 sq m of offices and 68,700 sq m of industrial space was assumed. Paragraph 7.27 recommended relaxing the allocations on the undeveloped land in Maylands Gateway to allow industrial uses, including potentially strategic warehousing, as well as offices.

South West Hertfordshire Economic Study Update (2019): not assessed.

(iii) Other relevant factors

Prologis Park phase 1: Planning permission 4/00064/17/MFA granted for 54,714 sq. metres of flexible commercial floorspace (B1(c)/B2/B8 with ancillary offices).

All the units on phase 1 have been completed except for Unit 4, which is under construction. Total completed floorspace = 40,847 sq. metres.

Phase 1, Unit 4: planning permission 4/01116/19/ROC granted for a computer data centre for Gyron (26,382 sq. metres). This supersedes the earlier permission under 4/00064/17 for 13,867 sq. metres. The data centre is under construction.

Phase 1 is in an Article 4 area. This means planning applications are required for changes of use from offices and some industrial and warehouse buildings to housing.

Prologis Park phase 2: the Council has granted planning permission (4/01922/19/MFA) for 21,726 sq. metres of industrial floorspace.

(iv) New Local Plan: conclusion

Include this land as part of the Maylands Business Park GEA, in view of the planning policy context, the evidence base findings and the development that has been permitted and implemented.

Local Plan Emerging Strategy for Growth reference: Policy DM16 - see guidance on Maylands Business Park in Table 19. Employment uses: offices, industrial, warehousing, as in Dacorum Borough Local Plan.

(v) Estimated employment floorspace change

40,847 sq. metres industrial development completed on phase 1
26,382 sq. metres industrial development under construction at phase 1, unit 4
21,726 sq. metres industrial development permitted on phase 2
88,955

Spencer's Park, Hemel Hempstead

Site area: 1.77 ha.

(i) Planning policy context

Dacorum Borough Local Plan 1991-2011 (2004)

Proposed uses: Local Plan Policy 35 (land at North East Hemel Hempstead) and proposal E4 in the Schedule of Employment Proposal Sites allocated a large area, including this site, for specialised technological industries and other activities in the national or regional interest.

Note: Policy 35 has been superseded by Core Strategy Policies CS1, CS14, CS15 and CS34.

Dacorum Core Strategy (2013)

The Core Strategy shows this site as part of the Service Centre Character Zone, where storage, distribution and warehousing are expected to continue to be the main uses.

Dacorum site Allocations (2017): North East Hemel Hempstead not covered by Site Allocations.

(ii) Evidence base studies

South West Hertfordshire Economic Study (2016): Not assessed.

Dacorum Employment Land Availability Assessment (2017)

Site Assessment - Appendix C pages 220-222, site ref: P1: Spencer's Park

Current use: Agricultural.

Proposed employment land use: Mixed B uses

Should the site be identified for potential employment use? Yes.

See Appendix A for site plan.

South West Hertfordshire Economic Study Update (2019): Not assessed.

(iii) Other relevant factors

Outline planning permission (4/02539/16/MOA) has been granted for housing led development on the Spencer's Park phase 2 site. This permission includes up to 7,500 m² of employment development (B1, B2, B8), the M2 land, where proximity to the Buncefield oil depot rules out housing.

(iv) New Local Plan: conclusion

Give GEA status in the new Local Plan to the M2 land in the south of the Spencer's Park site, given the ELLA advice and the outline planning permission - include in a GEA covering the whole of Maylands Business Park.

Local Plan Emerging Strategy for Growth reference: Policy DM16 - see guidance on Maylands Business Park in Table 19. Employment uses: offices, industrial, warehousing, as granted planning permission for.

(v) Estimated employment floorspace change

Gain: 7,500 sq. metres – likely to be industrial rather than office floorspace.

Swallowdale, Hemel Hempstead

Site area: 40.6 ha.

(i) Planning policy context

Dacorum Borough Local Plan 1991-2011 (2004)

The guidance on the site in the table of General Employment Areas in saved Policy 31 includes:.

Proposed uses: Industry, storage and distribution

Other key points: Retain open storage and depot uses. Proximity to hazardous substances at Buncefield Oil Terminal and Three Cherry Trees Lane may restrict development.

Maylands Masterplan (2007)

Within the Engine Room and Service Centre character areas – see ‘Core Strategy’ below.

Dacorum Core Strategy (2013)

Most of this area in two character zones (see Figures 18 and 22):

- The Engine Room, which should continue to offer a mix of industrial and commercial uses, as well as more flexible business uses. Figure 18 describes the area north of the Nickey Line as an area of residential opportunity and this area is shown on Figure 22.
- The Service Centre, where storage, distribution and warehousing are expected to continue to be the main uses.

A small area east of Three Cherry Trees Lane (occupied by a Gypsy site) is in the Spencer’s Park Character Zone, which is proposed for housing development.

Dacorum site Allocations (2017): North East Hemel Hempstead not covered by Site Allocations.

(ii) Evidence base studies

South West Hertfordshire Economic Study (2016): See under 'Breakspear Park' above.

Dacorum Employment Land Availability Assessment (2017)

Site Assessment - Appendix C pages 121-124, 129-132 and 137-140, site refs:

M1: Service Centre West;

M5: Engine Room North West; and

M10: Engine Room North

Description:

M1: large, strategic distribution centres, including Horizon Point.

M5: high quality big and medium sized industrial buildings and commercial buildings. Also, the Council depot, a household waste site, an Aldi supermarket, the Council owned Maylands Business Centre, a homeless hostel and motor trade uses.

M10: modern industrial park (includes several trade counters), the Finway Road industrial sites, vacant offices (Viking House) and a large logistics facility.

Should existing employment use be safeguarded?

M1 and M5: Yes.

M10: Yes. Apart from Viking House which has been lost to residential, the site is well functioning and should be retained.

See Appendix A for site plans.

South West Hertfordshire Economic Study Update (2019)

Site Review – Appendix, paragraphs D.105-D.111: The land north of the Nickey Line was assessed. Conclusions:

East of Redbourn Road: The breakers yard, Cupid Green depot and household waste sites serve local needs. If these sites become available, the need for local light industrial land will remain and, so retention for such use should be considered. Dilution of the employment area may jeopardise the functionality of the strategic estate.

West of Redbourn Road: The motor trades are less integral to the function of the industrial area – future commercial operators may be forthcoming. If not, alternative uses could be considered.

(iii) Other relevant factors

Hertfordshire County Council considers that the household waste site is too small and should be relocated. Dacorum Borough Council is proposing to relocate the Council depot, as it is too small to cope with the expanding local population.

The small scale standby electricity generation plant south of the MBC has temporary planning permission (4/00363/16) until 2033.

Part of Employment Land Availability Assessment sites M1 and M10 are in an Article 4 area. This means planning applications are required for changes of use from offices and some light industrial and warehouse buildings to housing.

The following land is excluded from the Article 4 area:

- land in M1 and M10 close to a hazardous site in Three Cherry Trees Lane - excluded as the prior approval regime does not apply there.
- M5 – excluded mainly as it is an area of residential opportunity in the Core Strategy.

(iv) New Local Plan: conclusion

Retain GEA designation in the new Local Plan for:

- The MBC and land to its east, given the Employment Land Availability Assessment and Economic Study Update advice.
- Land west of Redbourn Road, given the Employment Land Availability Assessment advice. This land includes a large warehouse as well as the motor trade uses referred to in the Economic Study Update.

Remove GEA designation from:

- Former Viking House site (Redbourn Road/Swallowdale Lane junction), as it has been redeveloped for housing.
- Land between the MBC and Redbourn Road (including Aldi, Council depot and household waste site) allocate part for housing, given:
 1. The area's mixed use character.
 2. The proposed relocation of the household waste site and Council Depot.
 3. The poor environmental quality of the scrap yards.

4. The potential for high density housing on the waste site, Council depot and scrapyards.

Local Plan Emerging Strategy for Growth references:

- Policy DM16 - see guidance on Maylands Business Park in Table 19. Employment uses: offices, industrial, warehousing, as in Dacorum Borough Local Plan.
- Proposals and Sites section - Growth Area HH17, proposed housing development at Council depot and adjoining land.

(v) Estimated employment floorspace change

Small loss of employment floorspace in Growth Area HH17.

2. EMPLOYMENT AREAS IN THE SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT

Paradise/Wood Lane, Hemel Hempstead

Site area:

(i) Planning policy context

Dacorum Borough Local Plan 1991-2011 (2004): Guidance on this area superseded by the Site Allocations (see below).

Dacorum Core Strategy (2013): No site specific policy guidance.

Hemel Hempstead Town Centre Masterplan 2011-2021 (2013)

Paradise forms part of the Hospital Zone, covered in section 5.4.1 of the masterplan. The key proposals for this zone included:

“To promote a wider mix of uses within the Paradise employment area to include high quality residential development.”

Dacorum Site Allocations (2017):

The ‘Schedule of mixed use proposals and sites’ refers to Paradise/Wood Lane as mixed use proposal MU/3.

Proposed uses: B1 led business and housing (75 homes).

Other key points: Potential for redevelopment for smaller units in B1 use. High density flats or housing acceptable.

Note: The site boundary is shown on page 26 of the Site Allocations Map Book.

(ii) Evidence base studies

South West Hertfordshire Economic Study (2016) Not assessed.

Dacorum Employment Land Availability Assessment (2017)

Site Assessment - Appendix C pages 29-32, site ref: A6

Description: An industrial estate with some residential uses.

Should existing employment use be safeguarded? Maybe / depends. The site provides important office and industrial units for small and medium businesses. However, the release of part of the site for housing may compromise the continued operational efficiency of the GEA.

See Appendix A for site plan.

South West Hertfordshire Economic Study Update (2019): Not assessed.

Site Review – Appendix D, paragraphs D.77-D.86

This industrial estate is reasonably well occupied and provides useful units, meeting demand for cheaper stock. Building quality is variable, with some older stock.

Redevelopment for newer industrial stock is not anticipated.

Viability for office development will be marginal and depends on cross subsidy by residential development.

(iii) Other relevant factors

Part owned by DBC.

44 flats under construction on the 5 Star Accident site (planning permission 4/01121/18/MFA).

Park House (office building on Park Lane): prior approval (4/01618/19/OPA) granted for change of use to housing (before the Article 4 area which requires permission for such changes of use became operational). A further application (4/20/02483/FUL) for retention of the offices with a rooftop extension for housing has been submitted.

(iv) New Local Plan: conclusion

Delete the mixed use proposal and allocate for high density housing led redevelopment in the new Local Plan, but exclude the 5 Star Accident site where housing is under construction.

A housing led allocation is justified given:

1. The variable quality of the industrial units.
2. The advice in the Economic Study Update.
3. The attractiveness of the area for high density housing in a location which would increase the vitality and viability of the town centre.

Local Plan Emerging Strategy for Growth reference: Proposals and Sites section - Growth Area HH04, proposed housing development with employment generating uses (including offices) at ground floor level, where viable.

(v) Estimated employment floorspace change

Substantial loss of existing employment floorspace expected.

New office floorspace – assume 500 sq. metres, but could be much higher if viability improves.

Apsley, Hemel Hempstead

Site area: 0.6 ha.

(i) Planning policy context

Dacorum Borough Local Plan 1991-2011 (2004): Guidance on this area was superseded by the Site Allocations (see below).

Dacorum Core Strategy (2013): No site specific policy guidance.

Dacorum Site Allocations (2017):

The guidance on the site in the table of General Employment Areas in Policy SA5 includes:

Proposed uses: B1(c)

Other key points: Small units to be retained.

Note: The site boundary is shown on sheet 6 of the saved Local Plan Policies Map (not in the Site Allocations Map Book, as the boundary was unchanged).

(ii) Evidence base studies

South West Hertfordshire Economic Study (2016): Not assessed.

Dacorum Employment Land Availability Assessment (2017)

Site Assessment - Appendix C pages 5-8, site ref: E34

Description: Small, fairly modern industrial cluster located in a residential area and consists of a number of small industrial and bulk trading units.

Should existing employment use be safeguarded? Yes. It is an important local industrial centre.

See Appendix A for site plan.

South West Hertfordshire Economic Study Update (2019): Not assessed.

(iii) Other relevant factors: Dacorum Borough Council owned.

(iv) New Local Plan: conclusion

Retain GEA designation in the new Local Plan, given the ELAA assessment.

Local Plan Emerging Strategy for Growth reference: Policy DM16 - see guidance on Apsley GEA in Table 19. Employment uses: light industrial as in Site Allocations. Small units to be retained.

(v) Estimated employment floorspace change

None.

Apsley Mills, Hemel Hempstead

Site area: SW of London Road (0.23 ha.); NE of London Road (0.68 ha.)

(i) Planning policy context

Dacorum Borough Local Plan 1991-2011 (2004): Guidance on this area was superseded by the Site Allocations (see below).

Dacorum Core Strategy (2013): No site specific policy guidance.

Dacorum Site Allocations (2017):

The guidance on the site in the table of General Employment Areas in Policy SA5 includes:

Proposed uses: B1

Other key points: The Cottage Building (listed) to be retained.

Note: The site boundary is shown on page 49 of the Site Allocations Map Book.

(ii) Evidence base studies

South West Hertfordshire Economic Study (2016): Not assessed.

Dacorum Employment Land Availability Assessment (2017)

Site Assessment - Appendix C pages 9-12, site refs:

A9 (SW of London Road);
A10 (NE of London Road)

Description:

A9 - Mercedes-Benz car dealership and vehicle servicing/repairs.
A10 – The Cottage: historic building used as offices.

Should existing employment use be safeguarded?

A9 – No. The site is sui generis.

A10 – Yes. The site is reasonably well occupied and provides small-scale office space.

See Appendix A for site plan.

South West Hertfordshire Economic Study Update (2019): Not assessed.

(iii) Other relevant factors: None.

(iv) New Local Plan: conclusion

SW of London Road: Delete GEA designation, as recommended in the Employment Land Availability Assessment. Include in Apsley district centre.

NE of London Road: Delete GEA designation as the land remaining in office use it is too small to justify GEA status. Proposed new Local Plan Policy DM17 will give some protection to the existing employment use.

Local Plan Emerging Strategy for Growth references: Policies DM17 (other office and industrial sites) and DM 19 (mix of uses in town, district and local centres).

(v) Estimated employment floorspace change

None expected, as The Cottage (the only building in B class use) is likely to remain as offices.

Corner Hall, Hemel Hempstead

Site area: 3.06 ha.

(i) Planning policy context

Dacorum Borough Local Plan 1991-2011 (2004): Guidance on this area was superseded by the Site Allocations (see below).

Dacorum Core Strategy (2013): No site specific policy guidance.

Dacorum Site Allocations (2017):

The guidance on the site in the table of General Employment Areas in Policy SA5 includes:

Proposed uses: B1

Other key points: Redevelopment of car showrooms/workshops in Two Waters Road encouraged for B1, but not for the existing use.

Note: The site boundary is shown on sheet 6 of the saved Local Plan Policies Map (not in the Site Allocations Map Book, as the boundary was unchanged).

(ii) Evidence base studies

South West Hertfordshire Economic Study (2016): Not assessed.

Dacorum Employment Land Availability Assessment (2017)

Site Assessment - Appendix C pages 9-12, site ref: A11

Description: mixed use residential and office site with motor trade uses and a builders' merchants.

Should existing employment use be safeguarded? Maybe/depends. The allocation should be reduced to reflect the parts of the site that are expected to remain in employment use.

See Appendix A for site plan.

South West Hertfordshire Economic Study Update (2019):

Site Review – Appendix D, paragraphs D.87-D.91.

The local commercial office market is subdued. However, the site is close to the town centre and is anticipated to be able to absorb some latent demand.

Independent office development unlikely to be viable, so residential mixed use enhances delivery prospects.

(iii) Other relevant factors

Two Waters Masterplan Guidance (February 2018): within Site 4 (Two Waters North), except for the land SW of the Corner Hall/Lawn Lane junction. Residential-led mixed use developments are proposed in Site 4.

(iv) New Local Plan: conclusion

Delete the GEA designation and allocate for high density housing led redevelopment in the new Local Plan.

A housing led allocation is justified given:

1. The advice in the Employment Land Availability Assessment and Economic Study Update.
2. The proposals in the Two Waters Masterplan Guidance.
3. There is now very little employment floorspace outside Site 4 of the masterplan.
4. The attractiveness of the area for high density housing in a location which would increase the vitality and viability of the town centre.

Local Plan Emerging Strategy for Growth reference: Proposals and Sites section - Growth Area HH11, proposed housing development with employment generating uses (including offices) at ground floor level on Two Waters Road, where viable.

(v) Estimated employment floorspace change

Loss of vehicle repairs/servicing (industrial) floorspace at existing motor trade uses.

New office floorspace – assume 1,000 sq. metres, but could be much higher if viability improves.

Doolittle Meadows, Hemel Hempstead

Site area:

(i) Planning policy context

Dacorum Borough Local Plan 1991-2011 (2004): Guidance on this area was superseded by the Site Allocations (see below).

Dacorum Core Strategy (2013): No site specific policy guidance.

Dacorum Site Allocations (2017):

The guidance on the site in the table of General Employment Areas in Policy SA5 includes:

Proposed uses: B1(a)

Other key points: None.

Note: The site boundary is shown on sheet 6 of the saved Local Plan Policies Map (not in the Site Allocations Map Book, as the boundary was unchanged).

(ii) Evidence base studies

South West Hertfordshire Economic Study (2016): Not assessed.

Dacorum Employment Land Availability Assessment (2017)

Site Assessment - Appendix C pages 73-76, site ref: E27

Description: Office cluster, comprising two high quality office buildings - Apsley One and Westside.

Note: There is a third office building, Apsley Two.

Should existing employment use be safeguarded? Yes

See Appendix A for site plan.

South West Hertfordshire Economic Study Update (2019): Not assessed.

(iii) Other relevant factors

Article 4 area. This means planning applications are required for changes of use from offices to housing.

(iv) New Local Plan: conclusion

Retain GEA designation in the new Local Plan, given the Employment Land Availability Assessment's advice and the commercially attractive location for offices close to Apsley station.

Local Plan Emerging Strategy for Growth reference: Policy DM16 - see guidance on Doolittle Meadows in Table 19. Employment uses: offices, as in Site Allocations.

(v) Estimated employment floorspace change

None.

Frogmore Mill, Hemel Hempstead

Site area:

(i) Planning policy context

Dacorum Borough Local Plan 1991-2011 (2004): Guidance on this area was superseded by the Site Allocations (see below).

Dacorum Core Strategy (2013): No site specific policy guidance.

Dacorum Site Allocations (2017):

The guidance on the site in the table of General Employment Areas in Policy SA5 includes:

Proposed uses: B1, B8

Other key points:

Part used for Paper trail visitor attraction. Scope for B1 uses elsewhere through limited intensification or making full use of mill buildings.

Manager's house is listed.

Note: The site boundary is shown on page 51 of the Site Allocations Map Book.

(ii) Evidence base studies

South West Hertfordshire Economic Study (2016): Not assessed.

Dacorum Employment Land Availability Assessment (2017)

Site Assessment - Appendix C pages 13-16, site ref: A12

Description: paper mill with a visitor centre.

Should existing employment use be safeguarded? Yes. Part of site has potential for alternative and more intensive employment use.

See Appendix A for site plan.

South West Hertfordshire Economic Study Update (2019):

Site Review – Appendix D, paragraphs D.92-95.

The Council asked for advice on the prospects of securing new B-class development, either new-build or within the existing mill building (assuming that the Paper Trail visitor attraction remains on the site).

The complex arrangements of aged compromised stock with little yard space suggests that securing new tenants is unlikely. The site's shape is also unattractive to future redevelopment and unlikely to be viable for light industrial with site clearance and remediation costs, notwithstanding the general demand for local light industrial.

(iii) Other relevant factors: None.

(iv) New Local Plan: conclusion

Delete GEA designation given the advice in the Economic Study Update and the low amount of employment floorspace on the site. Include within the Apsley district centre - see the Retail and Town Centres topic paper for an explanation of why this area is being included in the district centre.

Local Plan Emerging Strategy for Growth reference: Policies DM17 (other office and industrial sites) and DM19 (mix of uses in town, district and local centres).

(v) Estimated employment floorspace change

Modest loss of industrial space in existing building possible.

Two Waters (east of Two Waters Road), Hemel Hempstead

Site area: 2.04 ha.

(i) Planning policy context

Dacorum Borough Local Plan 1991-2011 (2004): Guidance on this area was superseded by the Site Allocations (see below).

Dacorum Core Strategy (2013): No site specific policy guidance.

Dacorum Site Allocations (2017):

The guidance on the site in the table of General Employment Areas in Policy SA5 includes:

Proposed uses: B1, B2, B8

Other key points: None.

Note: The site boundary is shown on page 52 of the Site Allocations Map Book.

(ii) Evidence base studies

South West Hertfordshire Economic Study (2016): Not assessed.

Dacorum Employment Land Availability Assessment (2017)

Site Assessment - Appendix C pages 5-8, site ref: E34

Description: Small, fairly modern industrial cluster located in a residential area and consists of a number of small industrial and bulk trading units.

Should existing employment use be safeguarded? Yes. It is an important local industrial centre.

See Appendix A for site plan.

South West Hertfordshire Economic Study Update (2019):

Site Review - Appendix D, paragraphs D.96, D.97 and D.101-D.104.

If redevelopment opportunities arise, demand exists for local light industrial uses but viability is uncertain (notably at the concrete plant) and a wider mix of commercial or quasi retail uses can be considered.

Retention of this site is appropriate, but future opportunities may be considered in due course.

(iii) Other relevant factors

Some elements of this area are unattractive, particularly Hanson Ready-mixed Concrete at the end of Riversend Road, Pol Heavy Haulage in Featherbed Lane and the bulky Access Self Storage building between Riversend Road and Two Waters Road.

Job numbers at the uses mentioned above are likely to be low.

(iv) New Local Plan: conclusion

Retain GEA given the advice in the Employment Land Availability Assessment and the Economic Study Update.

Local Plan Emerging Strategy for Growth reference: Policy DM16 - see guidance on Riversend Road, Two Waters in Table 19. Employment uses: offices, industrial, warehousing, as in Site Allocations.

(v) Estimated employment floorspace change

No change.

Two Waters (west of Two Waters Road), Hemel Hempstead

Site area: 4.87 ha.

(i) Planning policy context

Dacorum Borough Local Plan 1991-2011 (2004): Guidance on this area was superseded by the Site Allocations (see below).

Dacorum Core Strategy (2013): No site specific policy guidance.

Dacorum Site Allocations (2017):

Site Assessment - Appendix C pages 17-20, site ref: A13

Description: Chancerygate Business Centre (c.1980s/1990s) has some trade counters. Also, Symbio House offices (being demolished) and a bus depot.

Other key points: None.

Should existing employment use be safeguarded? Yes

Note: The site boundary is shown on page 52 of the Site Allocations Map Book.

(ii) Evidence base studies

South West Hertfordshire Economic Study (2016): Not assessed.

Dacorum Employment Land Availability Assessment (2017)

Site Assessment - Appendix C pages 17-20, site ref: A13

Description: Chancerygate Business Centre (c.1980s/1990s) has some trade counters. Also, Symbio House offices (being demolished) and a bus depot.

Should existing employment use be safeguarded? Yes

See Appendix A for site plan.

South West Hertfordshire Economic Study Update (2019):

Site Review - Appendix D, paragraphs D.96-D.100.

Prospects for office development are long term. The bus depot site presents an opportunity for light industrial development, subject to viability.

Retention of this site is appropriate, but future opportunities may be considered in due course.

(iii) Other relevant factors

Two Waters Masterplan Guidance (February 2018): within Site 2 (Two Waters /London Road Junction West). Residential development is proposed on the London Road frontage and London Road Trade Centre. The rest of the GEA is shown as “retained employment/retail area”.

Chancerygate Business Centre and London Road Trade Centre are in an Article 4 area. This means planning applications are required for changes of use from offices and some light industrial and warehouse buildings to housing.

Planning permission (4/03441/15/MFA) granted to replace the Symbio House offices by a 16 storey building containing 272 flats, but this permission has lapsed. Site now sold to another developer – revised housing scheme expected.

(iv) New Local Plan: conclusion

Retain GEA designation for Chancerygate Business Centre, London Road Trade Centre and Arriva bus depot given the advice in the Employment Land Availability Assessment and Economic Study Update, and the Article 4 area. This is a good quality employment site, so the proposal for housing on part of the site in the Two Waters Masterplan Guidance should not be taken forward.

Delete the Symbio House site from the GEA, as the Council has permitted housing development. Also delete the London Road frontage from the GEA as the existing motor trade and other uses are visually unattractive and it is a commercially attractive location for high density housing, as shown by the Symbio House proposals.

Local Plan Emerging Strategy for Growth reference: Policy DM16 - see guidance on Whiteleaf Road, Two Waters in Table 19. Employment uses: offices, industrial, warehousing, as in Site Allocations.

(v) Estimated employment floorspace change

Modest loss of industrial floorspace may occur.

Billet Lane, Berkhamsted

Site area: 0.8 ha.

(i) Planning policy context

Dacorum Borough Local Plan 1991-2011 (2004): Guidance on this area was superseded by the Site Allocations (see below).

Dacorum Core Strategy (2013): No site specific policy guidance.

Dacorum Site Allocations (2017):

The guidance on the site in the table of General Employment Areas in Policy SA5 includes:

Proposed uses: B1, B8

Other key points: None.

Note: The site boundary is shown on page 53 of the Site Allocations Map Book.

(ii) Evidence base studies

South West Hertfordshire Economic Study (2016): Not assessed.

Dacorum Employment Land Availability Assessment (2017)

Site Assessment - Appendix C pages 1-4, site ref: A15

Description: mixed industrial site with trade counter uses.

Should existing employment use be safeguarded? Yes. The site has been reduced by recent residential developments and mixed use proposal MU/7. It has a long-term occupier, so there is no reason to plan for its release.

See Appendix A for site plan.

South West Hertfordshire Economic Study Update (2019):

Site Review - Appendix D, paragraphs D.74-D.76.

The site is being promoted for housing development in the new Local Plan.

The business units are well occupied, supporting local requirements. However, opportunities for housing redevelopment could be explored in the long term as the stock ages and the need for upkeep is identified.

(iii) Other relevant factors

The existing building is old, but has been refurbished recently. It is understood that the leases run to the late 2020s.

(iv) New Local Plan: conclusion

Delete GEA designation and allocate for housing, given the age and nature of the building, the advice in the Economic Study Update and the small size of the GEA.

Local Plan Emerging Strategy for Growth reference: Proposals and Sites section - Growth Area Bk11, proposed housing development

(v) Estimated employment floorspace change

Loss of existing building, which is partly in employment use.

Northbridge Road, Berkhamsted

Site area: 6.7 ha.

(i) Planning policy context

Dacorum Borough Local Plan 1991-2011 (2004): Guidance on this area was superseded by the Site Allocations (see below).

Dacorum Core Strategy (2013): No site specific policy guidance.

Dacorum Site Allocations (2017):

The guidance on the site in the table of General Employment Areas in Policy SA5 includes:

Proposed uses: B1, B2, B8

Other key points: None.

Note: The site boundary is shown on sheet 2 of the saved Local Plan Policies Map (not in the Site Allocations Map Book, as the boundary was unchanged).

(ii) Evidence base studies

South West Hertfordshire Economic Study (2016): Not assessed.

Dacorum Employment Land Availability Assessment (2017)

Site Assessment - Appendix C pages 1-4, site ref: A20 (part)

Description: office and industrial units. Also, some retail uses, a household waste site and a children's indoor play centre.

Should existing employment use be safeguarded? Yes. The site together with River Park (see below) is well occupied and is Berkhamsted's main employment site.

See Appendix A for site plan.

South West Hertfordshire Economic Study Update (2019): Not assessed.

(iii) Other relevant factors

The site and River Park (see below) are in an Article 4 area. This means planning applications are required for changes of use from offices and some light industrial and warehouse buildings to housing.

(iv) New Local Plan: conclusion

Retain GEA designation given the advice in the Employment Land Availability Assessment and as Northbridge Road is Berkhamsted's main employment area.

Local Plan Emerging Strategy for Growth reference: Policy DM16 - see guidance on Northbridge Road in Table 19. Employment uses: offices, industrial, warehousing, as in Site Allocations.

(v) Estimated employment floorspace change

None.

River Park, Berkhamsted

Site area: 1.1 ha.

(i) Planning policy context

Dacorum Borough Local Plan 1991-2011 (2004): Guidance on this area was superseded by the Site Allocations (see below).

Dacorum Core Strategy (2013): No site specific policy guidance.

Dacorum Site Allocations (2017):

The guidance on the site in the table of General Employment Areas in Policy SA5 includes:

Proposed uses: B1, B2

Other key points: Small and medium sized units to be retained.

Note: The site boundary is shown on sheet 2 of the saved Local Plan Policies Map (not in the Site Allocations Map Book, as the boundary was unchanged).

(ii) Evidence base studies

South West Hertfordshire Economic Study (2016): Not assessed.

Dacorum Employment Land Availability Assessment (2017)

Site Assessment - Appendix C pages 1-4, site ref: A20 (part)

Description: office and industrial units.

Should existing employment use be safeguarded? Yes.

See Appendix A for site plan.

South West Hertfordshire Economic Study Update (2019): Not assessed.

(iii) Other relevant factors

The site and Northbridge Road (see above) are in an Article 4 area. This means planning applications are required for changes of use from offices and some light industrial and warehouse buildings to housing.

(iv) New Local Plan: conclusion

Retain GEA designation in the new Local Plan, given the advice in the Employment Land Availability Assessment.

Local Plan Emerging Strategy for Growth reference: Policy DM16 - see guidance on River Park in Table 19. Employment uses: offices, industrial, as in Site Allocations.

(v) Estimated employment floorspace change

None.

Akeman Street, Tring

Site area: 0.6 ha.

(i) Planning policy context

Dacorum Borough Local Plan 1991-2011 (2004): Guidance on this area was superseded by the Site Allocations (see below).

Dacorum Core Strategy (2013): No site specific policy guidance.

Dacorum Site Allocations (2017):

The guidance on the site in the table of General Employment Areas in Policy SA5 includes:

Proposed uses: B1

Other key points:

81-82 Akeman Street (listed building) to be retained.

Potential for some non-residential mixed uses (including social and community facilities), ancillary to the main B1 use.

Note: The site boundary is shown on page 53 of the Site Allocations Map Book.

(ii) Evidence base studies

South West Hertfordshire Economic Study (2016): Not assessed.

Dacorum Employment Land Availability Assessment (2017)

Site Assessment - Appendix C pages 17-20, site ref: A16

Description: several small units used for various employment and other purposes. Larger office and industrial buildings front onto Akeman Street.

Should existing employment use be safeguarded? No. Most of the site has been lost to residential through permitted development rights.

See Appendix A for site plan.

South West Hertfordshire Economic Study Update (2019): Not assessed.

(iii) Other relevant factors

As stated in the Employment Land Availability Assessment, prior approval has been granted for change of use to housing. However, the assessment was incorrect in saying that most employment uses had already been lost in 2017.

The housing development is now under construction

(iv) New Local Plan: conclusion

Delete GEA designation as the site is now going over to residential use.

Local Plan Emerging Strategy for Growth reference: none, as construction on the housing scheme is in progress.

(v) Estimated employment floorspace change

No change apart from committed loss of floorspace.

Brook Street, Tring

Site area: 0.6 ha.

(i) Planning policy context

Dacorum Borough Local Plan 1991-2011 (2004): Guidance on this area was superseded by the Site Allocations (see below).

Dacorum Core Strategy (2017): No site specific policy guidance.

Dacorum Site Allocations (2019):

The guidance on the site in the table of General Employment Areas in Policy SA5 includes:

Proposed uses: B1

Other key points: The mill (listed building) to be retained.

Small units to be retained.

Note: The site boundary is shown on sheet 1 of the saved Local Plan Policies Map (not in the Site Allocations Map Book, as the boundary was unchanged).

(ii) Evidence base studies

South West Hertfordshire Economic Study (2016): Not assessed.

Dacorum Employment Land Availability Assessment (2017)

Site Assessment - Appendix C pages 37-40, site ref: A19

Description: Former silk mill now occupied by a variety of small businesses.

Should existing employment use be safeguarded? Yes. Could potentially fall into residential use.

See Appendix A for site plan.

South West Hertfordshire Economic Study Update (2019): Not assessed.

(iii) Other relevant factors

The Council has resolved to approve planning application (ref. 4/02204/18/MFA) for extra care housing, subject to a S106 agreement being entered into. The application site is partly within the northern section of the GEA. However, there are unresolved issues and it is uncertain whether the S106 agreement will be signed and the planning permission issued.

The part of the GEA within the application site contains a small single storey employment building and an unused and overgrown car park.

(iv) New Local Plan: conclusion

Retain most of the GEA given the advice in the Employment Land Availability Assessment.

The northern part of the GEA within planning application site 4/02204/18 should lose its GEA status in view of the Council's decision to accept housing on this land and as very little B class floorspace would be lost.

Local Plan Emerging Strategy for Growth reference: Policy DM16 - see guidance on Brook Street in Table 19. Employment uses: offices, industrial, as in Site Allocations.

(v) Estimated employment floorspace change

Loss of 88 sq. metres floorspace proposed by application 4/02204/18.

Icknield Way, Tring

Site area: 5.95 ha.

(i) Planning policy context

Dacorum Borough Local Plan 1991-2011 (2004): Guidance on this area was superseded by the Site Allocations (see below).

Dacorum Core Strategy (2013): No site specific policy guidance.

Dacorum Site Allocations (2017):

The guidance on the site in the table of General Employment Areas in Policy SA5 includes:

Proposed uses: B1, B2, B8

Other key points: None.

Note: The site boundary is shown on page 54 of the Site Allocations Map Book.

(ii) Evidence base studies

South West Hertfordshire Economic Study (2016): Not assessed.

Dacorum Employment Land Availability Assessment (2017)

Site Assessment - Appendix C pages 21-24, site ref: A17

Description: industrial estate.

Should existing employment use be safeguarded? Yes. The site is well occupied and offers good quality industrial units.

See Appendix A for site plan.

South West Hertfordshire Economic Study Update (2019): Not assessed.

(iii) Other relevant factors: None.

(iv) New Local Plan: conclusion

Retain GEA designation given the advice in the Employment Land Availability Assessment and as the Icknield way Industrial Estate is Tring's main employment area.

Local Plan Emerging Strategy for Growth reference: Policy DM16 – see guidance on Icknield Way in Table 19. Employment uses: offices, industrial, warehousing, as in Site Allocations.

(v) Estimated employment floorspace change

None.

Icknield Way extension, Tring

Site area: 0.75 ha.

(i) Planning policy context

Dacorum Borough Local Plan 1991-2011 (2004): This site was in the Green Belt.

Dacorum Core Strategy (2013): No site specific policy guidance.

Dacorum Site Allocations (2017):

Proposed extension to the Icknield Way GEA Guidance on this site is provided by the Schedule of Employment Proposals and Sites (Proposal E/1) and Policy LA5.

Proposed uses: B1

Other key points: Site forms part of Local Allocation LA5 (see Policy LA5) and should comply with site master plan. Not suitable for B2 or B8 uses due to proximity to new housing development.

Note: The site boundary is shown on page 54 of the Site Allocations Map Book.

(ii) Evidence base studies

South West Hertfordshire Economic Study (2016): Not assessed.

Dacorum Employment Land Availability Assessment (2017)

Site Assessment - Appendix C pages 21-24, site ref: A7

Description: vacant land.

Should existing employment use be safeguarded? Yes (although not currently used for employment purposes).

See Appendix A for site plan.

South West Hertfordshire Economic Study Update (2019):

Site Review - Appendix D, paragraphs D.10-D.15.

The small site size will constrain the range of units and market interest, but the site is well positioned, adjacent to the existing industrial estate. It can help meet the demand for local employment uses such as mechanic repairs, construction and trade uses and material providers.

Around 30,000 sq. ft. of smaller units are anticipated, but the small size of the site means there may be viability issues. The site is too small for large strategic uses (such as B8).

(iii) Other relevant factors

The Council has approved hybrid planning application 4/00958/18/MFA for development on the LA5 site. This includes granting outline permission for 0.75 ha. of employment space (B1 (a), (b) and (c)).

The housing development has started.

(iv) New Local Plan: conclusion

Delete GEA designation for the reasons stated below:

1. The viability concerns raised in the Economic Study Update.
2. Because employment development would not fit well with the residential development on the LA5 site, especially as access would have to be taken from the new residential spine road, not from the adjoining industrial estate.
3. There is potential for a larger and better located new employment site at Dunsley Farm, which could meet Tring's long term needs.

Local Plan Emerging Strategy for Growth reference: Proposals and Sites section - Growth Area Tr04, proposed housing development.

(v) Estimated employment floorspace change

None.

There is a commitment for around 3,000 sq. metres of industrial space, but it is assumed in Appendix 4 that this commitment will not be implemented due to the intention to reallocate the site for housing in the new Local Plan.

Sharose Court and 3 London Road, Markyate

Site area:

(i) Planning policy context

Dacorum Borough Local Plan 1991-2011 (2004): Guidance on this area was superseded by the Site Allocations (see below).

Dacorum Core Strategy (2013): Part of the site (i.e. Sharose Court) is covered by Strategic Site S2 (Hicks Road) in the Markyate Place Strategy. Redevelopment of site for a mixed use scheme is proposed, including business, light industrial (Class B1c) and storage and distribution units (Class B8).

Dacorum Site Allocations (2017):

The guidance on the site in the table of General Employment Areas in Policy SA5 includes:

Proposed uses: B1, B2, B8

Other key points: Small units in Sharose Court to be retained.

Note: The site boundary is shown on page 54 of the Site Allocations Map Book.

(ii) Evidence base studies

South West Hertfordshire Economic Study (2016): Not assessed.

Dacorum Employment Land Availability Assessment (2017)

Site Assessment - Appendix C: This site should have been assessed, but was missed out.

See Appendix A for site plan: site ref: A18.

South West Hertfordshire Economic Study Update (2019): Not assessed.

(iii) Other relevant factors

Consists of:

- Sharose Court (accessed off Hicks Road) – light industrial units. The Hicks Road redevelopment scheme (permission 4/01173/11) included additional units at Sharose Court. Most of this scheme has been implemented, but not the Sharose Court units.
- 3 London Road: Marvin's Magic – warehouse (producer and dealer of magic products).

An outline planning application (4/20/02159/OUT) has been submitted to demolish the existing buildings and construct a care home.

(iv) New Local Plan: conclusion

Retain Sharose Court in GEA, as it provides good quality employment space and job opportunities in Markyate are limited.

Delete 3 London Road from the GEA, as it provides few jobs and the proposed care home would help meet the identified need for more such facilities.

Local Plan Emerging Strategy for Growth reference: Policy DM16 – see guidance on Sharose Court in Table 19. Employment uses: offices, industrial, warehousing, as in Site Allocations. Small units to be retained.

(v) Estimated employment floorspace change

The demolition of 3 London Road would result in the loss of 2,340 sq. metres of B8 floorspace.

Bourne End Mills

Site area: 6.93 ha.

(i) Planning policy context

Dacorum Borough Local Plan 1991-2011 (2004): Guidance on this area was superseded by the Site Allocations (see below).

Dacorum Core Strategy (2013): No site specific policy guidance. However, Policy CS5 (Green Belt) is relevant, as the site is in the Green Belt and is designated as a major development site in the Green Belt.

Dacorum Site Allocations (2017)

The guidance on the site in the table of Employment Areas in the Green Belt in Policy SA6 includes:

Proposed uses: B1, B2, B8

Other key points: The site is also designated as a major developed site in the Green Belt under Core Strategy Policy CS5.

Note: The site boundary is shown on page 57 of the Site Allocations Map Book.

(ii) Evidence base studies

South West Hertfordshire Economic Study (2016)

Site assessment: Paragraphs 8.18-8.23

Recommendation: Poor quality out of town industrial estate with poor quality accommodation and built environment. Occupancy rates are poor with a number of vacant plots which could provide additional employment land. However, due to the scale of the site we recommend that policy supports the continued use of this site for employment provision with support for improvements to the site.

Dacorum Employment Land Availability Assessment (2017)

Site assessment - Appendix C pages 33-36, site ref: A2

Description: Large industrial estate in the Green Belt. Consists of (1) land (2.8 ha.) where new B1(c)/B2/B8 units are being built (2) land (1.19 ha.) where older industrial units have been demolished prior to residential development (3) two small areas containing older industrial units.

Should existing employment use be safeguarded? Yes. Revise boundaries to reflect extent of future employment and housing uses.

See Appendix A for site plan.

South West Hertfordshire Economic Study Update (2019): Not assessed.

(iii) Other relevant factors

Area (1) in the Employment Land Availability Assessment has now been redeveloped for employment purposes (under permission 4/03072/15), whilst housing development is taking place on area (2). It means that the recommendation in the 2016 South West Hertfordshire study now has little relevance.

(iv) New Local Plan: conclusion

Retain the following parts of the employment area:

- 1.The land recently redeveloped for employment purposes under 4/03072/15.
- 2.The two older industrial units on Upper Bourne End Lane (occupied by Ellis Autos and Pemtech ARC), next to the new employment buildings.

Remove from employment area:

- 1.The land being developed for housing.
2. The older industrial unit on Upper Bourne End Lane (occupied by Globaltopz UK & E Automatic Equipment) next to the new housing.
Reason: this site is much more closely related to the new housing than the remaining employment area.

It is also proposed to expand this employment area - see Appendix 8.

The site's designation as a major developed site in the Green Belt (MDS) should be deleted. This is because classifying the site both as a GEA and an MDS in the Green Belt is unnecessary duplication and may cause confusion. Also, Government guidance no longer refers to MDSs.

Local Plan Emerging Strategy for Growth reference: Policy DM16 – see guidance on Bourne End Mills in Table 19. Employment uses: offices, industrial, warehousing, as in Site Allocations.

(v) Estimated employment floorspace change

A floorspace gain is expected from the expansion of this employment area - see Appendix 8.

Bovingdon Brickworks

Site area:

(i) Planning policy context

Dacorum Borough Local Plan 1991-2011 (2004): Guidance on this area was superseded by the Site Allocations (see below).

Dacorum Core Strategy (2013): No site specific policy guidance. No site specific policy guidance. However, Policy CS5 (Green Belt) is relevant, as the site is in the Green Belt and is designated as a major development site in the Green Belt

Dacorum Site Allocations (2017):

The guidance on the site in the table of Employment Areas in the Green Belt in Policy SA6 includes:

Proposed uses: B1, B2, B8

Other key points: The site is also designated as a major developed site in the Green Belt under Core Strategy Policy CS5.

Note: The site boundary is shown on page 57 of the Site Allocations Map Book.

(ii) Evidence base studies

South West Hertfordshire Economic Study (2016): Not assessed.

Dacorum Employment Land Availability Assessment (2017)

Site Assessment - Appendix C pages 37-40, site ref: A1

Description: Consists mainly of Bovington Brickworks; also other uses on a mixed industrial estate in the Green Belt. Contains a mix of old industrial buildings. Next to the site are large areas used for clay extraction and storing bricks.

Should existing employment use be safeguarded? Yes.

See Appendix A for site plan.

South West Hertfordshire Economic Study Update (2019)

Site Review - Appendix D, paragraphs D.24-D.30.

This is an established employment site, serving the needs of local industrial uses. It is suitable that the site continues its current function.

The landowners (Bovingdon Brickworks) are promoting a redevelopment for industrial uses (7,000-8,000 m²) on part of the site (1.9 ha.). The site's relative isolation makes it unlikely to attract distribution operators, but demand from local industrial occupiers is expected. Site viability depends on clearance cost.

The Economic Study Update also assessed the possible expansion of this employment area – see Appendix 8.

(iii) Other relevant factors

Brick production has now ceased, which explains why the landowners are promoting an industrial development to replace the buildings where bricks were made.

(iv) New Local Plan: conclusion

Retain GEA designation given the advice in the Employment Land Availability Assessment and Economic Study Update.

It is also proposed to expand this employment area - see Appendix 8.

The site's designation as a major developed site in the Green Belt (MDS) should be deleted. This is because classifying the site both as a GEA and an MDS in the Green Belt is unnecessary duplication and may cause confusion. Also, Government guidance no longer refers to MDSs.

Local Plan Emerging Strategy for Growth reference: Policy DM16 – see guidance on Bovingdon Brickworks in Table 19. Employment uses: offices, industrial, warehousing, as in Site Allocations.

(v) Estimated employment floorspace change

A floorspace gain is expected from the expansion of this employment area - see Appendix 8.

APPENDIX 7: ASSESSMENT OF POTENTIAL NEW GREENFIELD EMPLOYMENT SITES

Two Waters Road/A41 junction, Hemel Hempstead
<u>Site Location</u> Site area: 5.6 ha.
<u>Existing land use</u> Agricultural (permanent pasture).
<u>Planning policy context and planning history</u> Dacorum Borough Local Plan 1991-2011 (2004) The site is located in the Green Belt. Roughdown Common to the north west of the site is a Site of Special Scientific Interest (SSSI) and is protected under saved Policy 102 (sites of importance to nature conservation). Dacorum Core Strategy (2013) Policy CS5 (Green Belt) is particularly relevant. Dacorum Site Allocations Development Plan Document (2017) Retained in the Green Belt. Dacorum Local Plan Issues and Options Consultation (2017) Paragraph 7.33 in the consultation document summarised the conclusions of the Dacorum Employment Land Availability Assessment on land for industrial and warehousing uses, including that: <ul style="list-style-type: none">• The Council should allocate a portfolio of local quality sites in excess of current allocations. There are potential sites near the A41, but these locations are not attractive for large warehouses.

- Suitable sites are east of the A41 at Two Waters, Hemel Hempstead (5.6 hectares) and Dunsley Farm, Tring (up to 5 hectares). Both sites have good access to the A41 and could accommodate small and medium sized industrial and warehouse units.

Paragraph 7.34 stated that the Council considered it sensible to accept the recommendations of the land availability assessment and that the need for additional employment land justified changes to the Green Belt in these areas.

Paragraph 10.8.1 in the consultation document referred to the Council’s initial assessment of potential key development sites in the draft Schedule of Site Appraisals that was published alongside the consultation. The Two Waters Road/A41 Junction site was considered in the draft site appraisals document – for further information see point 5 in ‘evidence base studies’ below.

Question 22 in the consultation document asked:

“Do you agree with the proposed approach to choosing sites to accommodate future jobs growth?”

The main points raised in the responses to Question 22 about the Two Waters Road/A41 Junction site are summarised below (see Appendix 2 for a fuller summary):

Response from	Answer to question	Main points made
Hertfordshire County Council (Environment Department)	No	East of A41 at Two Waters - served by 500 bus route, close to the two rail stations.
CPRE – The Hertfordshire Society	No	The need for jobs is not an “exceptional circumstance” to justify using Green Belt land for employment use.
General public	No	<p>General comments</p> <p>Green Belt sites should not be used.</p> <p>Comments on land East of A41 at Felden, Hemel Hempstead</p> <p>The site may be accessible to the A41, but the local area is congested and cannot take any more traffic.</p>

Planning history

No relevant planning history.

Evidence base studies

1. Green Belt Review

(i) Stage 1: Green Belt Purposes Assessment (Sinclair, Knight, Merz, November 2013)

This study provided a strategic review of Green Belt land in Dacorum, St Albans and Welwyn Hatfield Councils to identify its contribution towards the national Green Belt purposes in the NPPF. It identified areas of Green Belt land which were considered to contribute least towards national purposes. However, it stressed the need for further studies to identify precise revised Green Belt boundaries.

Annex 1 contains the assessment for Dacorum. The Two Waters Road/A41 Junction site formed a very small part of Strategic Parcel 14A, a parcel which was considered to make a significant contribution to the Green Belt purposes.

(ii) Stage 2 Green Belt Review and Landscape Appraisal (ARUP, January 2016)

This study of Dacorum gave a more detailed assessment than stage 1. It highlighted areas which were performing least well against Green Belt purposes and were least sensitive in landscape terms.

The Two Waters Road/A41 Junction site was within Sub-Area HH-A11, which during the course of the report was redefined as HH-A11a. Table 5.2 (page 54) indicated that HH-A11 contributed weakly to the Green Belt purposes. However, the more detailed analysis on pages A13 and A14 stated on Green Belt purpose 3 (to assist in safeguarding the countryside from encroachment) that:

“...the western part of the subarea retains a considerably more unspoilt, rural character, encompassing Roughdown Common and Further Roughdown and, despite the severance caused by the A41, retains linkage with the wider countryside.”

The Landscape Appraisal concluded that:

“The overall sensitivity of this landscape is judged **high** by virtue of its relationship to Roughdown Common, relatively prominent and elevated aspect and sense of detachment from the settlement.”

Given the above, the Two Waters Road/A41 Junction site was not recommended for release from the Green Belt.

(iii) Stage 3 Green Belt Review (ARUP, August 2020)

The Stage 3 review assessed potential housing and employment site allocations that lie within the Green Belt. For each site, it advised on where the new Green Belt boundary should be defined if the site is released from the Green Belt and whether the boundary should be strengthened. Table 4.1 in the main report summarised the site by site findings.

The Two Waters Road/A41 Junction site was not assessed in the Stage 3. However, it is intended that the site will be assessed as part of the Stage 3 study before the Local Plan is published.

2. Site Assessment Study (AECOM, January 2020)

This study assessed 144 greenfield sites identified by the Council as having potential for residential or employment development. The Two Waters Road/A41 Junction site is Site 71 in Volume 3 (Final Site Schedules) and the following points are particularly relevant:

“Transport conclusion - The site has frontage onto the A41 southbound off-slip and the A414 dual carriageway. While access from the A414 is technically feasible, there is concern whether a new access on this busy route and in this location would be supported by the highway authority, without a more detailed assessment of access options. The concern will be (i) the principle of a new junction on this major route through the town, and (ii) the potential impact on the A41 and A4251/A414 junctions of any queuing that would occur at the new junction. There is also no existing pedestrian/cycle access to the site, and narrow verges to the north may restrict provision of a new route into Hemel Hempstead.

Economic development potential - The area contains a large concentration of employers however; workers do not tend to hold high-level occupations. However, the location is a major benefit for this site which is very accessible by most forms of transport. The site has good access to Hemel Hempstead Train Station, is accessible by the local bus network and is located in the close vicinity to the Two Waters A41 Junction. This accessibility makes the site a very attractive to potential employers. In addition, the nearby housing to the south-east means those workers tend to live nearby to this site, whilst the transport links allow sustainable modes of transport. Hemel Hempstead is a focus for developments and jobs, and this site is an opportunity to grow the area near to the station.

Overall site conclusion – comments: Traffic access issues appear to be a fundamental constraint to development in both residential and employment terms. Whilst a solution is technically feasible, the principle of provision of a new junction in this location would have to be agreed with the highway authority, with the onus being on the site promoter/developer to demonstrate an access solution that is acceptable. Site performs reasonably well in Green Belt terms and is away from AONB and its setting. Were constraints to be mitigated, site considered more suitable for employment than for residential use.

Overall site conclusion - final rating: Unsuitable for allocation”

3. Dacorum Employment Land Availability Assessment (PBA, October 2017)

Appendix C contains an assessment of the Two Waters Road/A41 Junction site on computer pages 220-222 (site P2). The following recommendation was made:

“Should the site be identified for potential employment use? Yes

Reasons/comments: The site has potential to accommodate local industrial needs. It is unlikely to provide any substantive office floorspace because of its locational constraints, but it could be developed to link with existing employment uses in the Two Waters area.”

In the main body of the report, paragraph 5.34 concluded as follows on this site:

“this green belt site (6ha) site forms one side of the gateway to Hemel Hempstead from the A41. Unless there is significant intervention through the relocation of the railway station, the site is unlikely to support new build office development. The A41 is not seen as a prime location for strategic warehousing so, if allocated, industrial development on this site would be catering to the local market (B1c, B2 and B8 uses).”

Paragraph 5.44 is also relevant:

“We also consider that DBC should consider allocating further sites for local industrial occupiers to allow for churn and choice e.g. where existing sites are approaching the end of their viable lifespans and might be more suited to redevelopment for alternative uses, providing a pipeline of local quality sites would allow this to happen. We consider that sites on the A41 corridor, specifically at Tring and Two Waters (Hemel Hempstead) in proximity to existing employment uses, could be considered by DBC as potential employment allocations.”

In addition, paragraph 6.22 recommended that:

“...for qualitative reasons, DBC should consider allocating additional land for local industrial uses (unit sizes of less than 1,858 sqm) on land at Dunsley Farm (Tring) and land north east of A41 at Two Waters (Hemel Hempstead). Again though, these allocations will need to be balanced against competing land uses and green belt release.”

4. South West Hertfordshire Economic Study Update (Hatch Regeneris, September 2019)

The site was assessed in Appendix D on pages D-17 and D-18. The following conclusion was drawn:

“The site has strong locational attributes on the local network, labour market access and proximity to Hemel Hempstead station. The site is expected to experience demand for local population serving light industrial uses.”

Table 8.11 in the main body of the report summarised the conclusions from the site reviews in Appendix D, including the following on the Two Waters Road/A41 Junction site:

Area with development potential (ha.)	Potential uses	Comments
5	B1c, B2	Green Belt site suitable for light industrial uses serving needs of local businesses. Unlikely the site will attract large scale industrial uses given competing locations.

In addition, paragraph 9.27 stated that:

“We have identified a lack of supply of land suitable for small scale industrial uses in Dacorum, Watford and Three Rivers. These authorities may wish to consider allocating additional sites that can meet the needs of businesses serving local markets. Of the potential future sites that have been reviewed in this study, the following may be suitable, although these are all also in the Green Belt...”

The Two Waters site is one of the sites listed in paragraph 9.27.

5. Draft ‘Schedule of Site Appraisals (for Large Greenfield Sites) (DBC, November 2017)

The Local Plan Issues and Options consultation document was accompanied by the draft ‘Schedule of Site Appraisals (for Large Greenfield Sites)’. This was the Council’s initial assessment of sites which were currently in the Green Belt or Rural Area and had been put forward by developers and landowners for either housing and/or employment use. The Two Waters Road/A41 Junction site was referred to as site HH-e1 in this document and the site was appraised on pages 25-29 as a potential employment site.

Liaison with landowners

Owners

Felden Park Farms Ltd

Landowner meetings

A meeting with between the Council and Bidwells (on behalf for the landowners) was held on 18 April 2017. Main points to note:

- The landowners support employment development on the site, probably in the form of light industrial use or offices, with smaller, flexible units. The development might be similar to Chancerygate (across the railway line).
- Road access into the site is uncertain, although Bidwells think it can be achieved. Possible solutions include a left in, left out access on Two Waters Road or a new access onto the existing dumbbell roundabout (which would require modification). Bidwells asked whether a transport assessment was necessary at this stage in the plan-making process, but no decision was reached.
- The adjoining land to the north and west is owned by the Box Moor Trust and is of nature conservation importance, particularly Roughdown Common SSSI. The relationship between the site (if developed) and the Box Moor Trust land should be handled carefully. In particular, the western tip of the site should probably be kept clear of built development, due to its proximity to Roughdown Common and its visibility from the countryside beyond the A41.

There is potential for development on the site to fund enhancements to the Box Moor Trust land. Possible measures should be discussed with the trust and may involve landscape enhancement; improved public accessibility by providing a public car park within the scheme; and improvements to public footpaths around the nature reserve to allow disabled access.

- The Green Belt boundary might be realigned to follow the A41, in order to provide a well-defined, long-term defensible new boundary. The Box Moor Trust land could then be protected by designating it as open land.

Further liaison, summer and autumn 2020

Several emails have been exchanged between the Council and Bidwells, and a number of technical reports have been prepared on behalf of the landowners. The main points are summarised below:

- **Road access:** Stomar (civil engineering consultants produced a technical note in October 2020 for the land owners. This note recommends that:

“Provision of a simple priority ‘left in left out’ junction on Two Waters Way would be, on balance, the most cost-effective way of providing access and have the least impact on the existing highway.

Hertfordshire County Council as highway authority has not yet commented on the technical note.]

- **Pedestrians and cyclists:** Stomar's technical note (see above) concludes that "Access by pedestrians would be limited but possible via the existing railway footbridge and public footpath network. This could potentially be upgraded to allow access by bicycle." As mentioned above, the County Council has not yet commented on the technical note.

The existing public footpath runs from London Road, through the National Grid site (Growth Area HH09 in the Local Plan Emerging Strategy consultation document) and over the railway. Stomar is liaising with National Grid about possible improvements to this route.

- **Visual impact and topographical survey:** the Council asked for an assessment of whether any employment development on the site would be visually intrusive when viewed from the open countryside west of the A41 and what measures should be introduced to mitigate the impact. In response, Bidwells commented that:

"The ground levels rise to the west and the western boundary has a mature hedge line. Given the surrounding topography and site levels there are no public vantage points from the west which overlook. We are confident the buildings will not intrude within the wider landscape. The site is very well contained by the surrounding infrastructure, settlement boundary and topography. Given the rising nature of the land ground floor slab levels will require a certain amount of cut and fill."

A topographical survey was produced by Associated Surveys Consultants for the landowners in October 2020.

- **Roughdown Common SSSI:** Bidwells met the Box Moor Trust on 14 October 2020 to discuss ways of mitigating the impact of the proposed development on the Box Moor Trust's Roughdown Common land to the west and possible ways that the development could fund enhancement of the common. Discussions are continuing.
- **Size of industrial units:** it was agreed that any industrial development on the site should consist mainly of units of under around 2,000 sq. metres and that there should be a proportion of considerably smaller units.

Additional proposed technical work

The landowners have stated their intention to review the ecological and landscape impact of the proposed development, produce a constraints plan. They may also commission a high level master plan and proposals for Green Belt mitigation and biodiversity offset.

The landowners have also indicated that arable fields in their ownership west of the A41 could be made available to mitigate the impact on the Green Belt, to meet the requirements of NPPF paragraph 138.

Estimated potential employment floorspace

The site area is 5.6 ha, but the net development area is lower given the need for landscaping adjacent to the A41 and the Box Moor Trust land, and as the western part of the site is very narrow. An indicative sketch layout for industrial development on the site has not been produced, but it seems likely that the net developable area is around 5 ha.

Assuming a plot ratio of 0.4 for industrial development, as recommended in the South West Hertfordshire Economic Study Update, the site could accommodate around 20,000 sq. metres of industrial floorspace. Part of the site could be developed for offices, but a significant office element seems unlikely in this location.

Conclusion

The site is well located for employment development and an employment allocation is supported by the landowners. The market is expected to favour small and medium sized industrial units, rather than offices. Around 20,000 sq. metres of industrial floorspace could be accommodated.

Therefore, the site is proposed for employment development in the Local Plan Emerging Strategy for Growth consultation document (Growth area HH16). However, the following issues must be resolved before the Council reaches a conclusion on the site in the publication (Regulation 19) version of the Local Plan:

- **Green Belt purposes and landscape sensitivity:** given the findings in the Stage 2 Green Belt Review and Landscape Appraisal, the site needs to be looked at more closely by ARUP in the Stage 3 Green Belt Review. The landowner's forthcoming study on the landscape impact of the proposed development will also be relevant.
- **Impact on Roughdown Common SSSI:** it is hoped that discussions between the landowners and the Box Moor Trust on measures to mitigate the impact of the development on Roughdown Common and enhance the nature reserve will result in an agreed way forward. The landowner's proposed ecological study will be taken into account, as will their potential study on biodiversity offsetting, if produced.
- **Road access and pedestrian and cyclist access:** Hertfordshire County Council needs to respond to Stomar's technical note.
- **Green Belt compensatory improvements:** a conclusion is needed in relation to NPPF paragraph 138. This paragraph states that where Green Belt land is released for development, plans should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

Adjacent to Shendish Manor, Apsley, Hemel Hempstead

Site Location

Site area: 96 ha.

Existing land use

The site consists mainly of a golf course, agricultural land and woodland. Shendish Manor (hotel) and nearby housing are excluded from the site.

Planning policy context and planning history

Dacorum Borough Local Plan 1991-2011 (2004)

The site is located in the Green Belt. The western part of the site is within an area of archaeological significance (Policy 118), whilst Shendish Manor and Apsley Manor Farmhouse (both excluded from the site) are Grade II listed (Policy 119). Policy 99 (preservation of trees, hedgerows and woodlands) is also relevant.

Dacorum Core Strategy (2013)

Policy CS5 (Green Belt) is particularly relevant, as is Policy 27 (quality of the historic environment) given the archaeological site, the adjacent listed buildings and as part of Shendish Manor is a Locally Registered Park and Garden.

Dacorum Site Allocations Development Plan Document (2017)

Retained in the Green Belt.

Dacorum Local Plan Issues and Options Consultation (2017)

The site was not mentioned in section 7 of the consultation document as a possible employment site. However, paragraph 10.8.1 referred to the Council's initial assessment of potential key development sites in the draft Schedule of Site Appraisals that was published alongside the consultation. Shendish was considered in the draft site appraisals document for housing led development with 2 hectares of employment development – for further information see point 5 in 'evidence base studies' below.

Paragraph 10.8.1 in the consultation document referred to the Council's initial assessment of potential key development sites in the draft Schedule of Site Appraisals that was published alongside the consultation. Shendish was considered in the draft site appraisals document – for further information see point 5 in 'evidence base studies' below.

Question 46 in the consultation document asked:

“Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisal working note which accompanies it?”

There was very substantial opposition to development at Shendish for a range of reasons, including loss of Green Belt, harm to the historic environment and inadequate road access.

Boyer Planning on behalf of the landowners (W Lamb Ltd) submitted a response to the consultation document and a Green Belt Assessment. It was concluded that the whole site should be removed from the Green Belt and that the eastern part (32.2 ha) should be allocated for housing development. No employment development was proposed. The representations proposed improvements to the access from London Road and also referred to a possible new access from Rucklers Lane.

Planning history

No relevant planning history.

Evidence base studies

1. Green Belt Review

(i) Stage 1: Green Belt Purposes Assessment (Sinclair, Knight, Merz, November 2013)

This study provided a strategic review of Green Belt land in Dacorum, St Albans and Welwyn Hatfield Councils to identify its contribution towards the national Green Belt purposes in the NPPF. It identified areas of Green Belt land which were considered to contribute least towards national purposes. However, it stressed the need for further studies to identify precise revised Green Belt boundaries.

Figure 8.1 identified land contributing least towards Green Belt purposes, one of these areas being sub-area D-S3 (Land south of Hemel Hempstead enclosed by the A41 and railway line, and in the vicinity of Rucklers Lane), which included Shendish. Paragraph 8.2.3 explained that this sub-area:

“...is considered to contribute least towards the five Green Belt purposes. This land is enclosed by strong urban features and contains the relatively large-scale ribbon development along Rucklers Lane in the Green Belt. It therefore displays strong urban fringe

characteristics. Assessed in isolation the strategic sub-area makes a limited or no contribution towards checking sprawl, preventing merging or safeguarding the countryside. A reduction in the size of the strategic parcel would not significantly compromise the primary functions of the Green Belt or compromise the separation of existing settlements.”

(ii) Stage 2 Green Belt Review and Landscape Appraisal (ARUP, January 2016)

This study of Dacorum gave a more detailed assessment than stage 1. It highlighted areas which were performing least well against Green Belt purposes and were least sensitive in landscape terms.

As in the stage 1 report, the Shendish area was called sub-area D-S3. Table 5.2 (page 54) indicated that D-S3 contributed weakly to the Green Belt purposes.

However, the Landscape Appraisal concluded (page 95) that the overall sensitivity of this landscape was **medium to high**. Despite this, the report:

“...recognised that the narrow belt of lower lying, visually contained and less prominent land to the east, adjacent to the railway and east of an historic tree belt and field boundary line, has **lower (potentially medium)** sensitivity in landscape and visual terms. Further, more detailed studies would however be needed to determine this and such judgements would also need to be considered in relation to historic integrity and the setting and significance of designated heritage assets.”

As a result, further consideration was given to the extent of a possible Green Belt boundary change. The D-S3 map on page 115 showed just the lower (eastern) part of the site, which is less sensitive in Green Belt and landscape terms.

Chapter 7 (recommendations) identified a series of further refined Green Belt sub-areas which should be given further consideration by the Council. Table 7.2 included the eastern part of D-S3 as a ‘more constrained area for further consideration, but advised that:

“...any potential inclusion of this part of the site in further work should be weighed up against heritage considerations such as essential setting and significance, also encompassing a more detailed examination of landscape, ecological, heritage and the designed, functional and visual setting for Shendish and its parklands.”

(iii) Stage 3 Green Belt Review (ARUP, August 2020)

The Stage 3 review assessed potential housing and employment site allocations that lie within the Green Belt. For each site, it advised on where the new Green Belt boundary should be defined if the site is released from the Green Belt and whether the boundary should be strengthened. Table 4.1 in the main report summarised the site by site findings.

The assessment of Shendish (site 82) can be found on page 54 in Annex A.

2. Site Assessment Study (AECOM, January 2020)

This study assessed 144 greenfield sites identified by the Council as having potential for residential or employment development. The Shendish site is Site 82 in Volume 3 (Final Site Schedules) and the following points are particularly relevant:

“Transport conclusion - The site has an existing access onto the A4251 (providing access to Shendish Manor hotel and golf course). For the majority of its length the access road is wide enough to accommodate two way traffic flows. However, the road narrows as it crosses the bridge over the railway line and this section is sub-standard. The bridge is also located on a sharp curve and this restricts forward visibility. There are no existing footpaths and there does not appear to be sufficient width to accommodate a footpath on the section of access road between London Road and the railway bridge. Pedestrian facilities could not be provided across the railway bridge without widening the structure. Therefore the existing access from London Road is considered not suitable to serve residential development on this site. The site is also accessible from Rucklers Lane and possibly from Shearwater Road, although this is subject to confirmation of the extent of the adopted highway at this location; the site has good access to local facilities and public transport on London Road, including the mainline railway, although some parts of the site would be remote from the public transport route and may require new/diverted service to improve accessibility.

Economic development potential - The area where the site is located, to the south of Hemel Hempstead near Apsley Station contains a good concentration of businesses with a very well-qualified labour force that are in high-level occupations. This concentration of businesses would mean the site is able to attract to potential employers and the good-quality workforce travelling to this location is a further major benefit. The Apsley train station provides access via train which is considered crucial by some employers to attract the desired workforce, and the station provides direct access to London Euston. The Dacorum Employment Land Availability Assessment has assessed a similar site to this (see below) and believes interest from the market as it is not viewed as an office location.”

Overall site conclusion – comments: Site’s performance on landscape criterion provides it with some capacity for development, particularly if development can be more focused on the lower rather than the upper slopes- this is the best option for mitigation of visual impact. Also, site does not impact on large scale landscape designations such as the AONB. However, site performs relatively poorly on transport criterion and is in Green Belt. On balance, the site is considered potentially suitable for allocation with major constraints.

Overall site conclusion - final rating: Potentially suitable for allocation with major constraints.”

3. Dacorum Employment Land Availability Assessment (PBA, October 2017)

Appendix C contains an assessment of the Two Waters Road/A41 Junction site on computer pages 223-225 (site P3). The following recommendation was made:

“Should the site be identified for potential employment use? No.

Reasons/comments: The presence of heritage constraints and the lack of strategic access is likely to curtail any employment development on the site. There is no market evidence to suggest it would be deliverable if allocated for employment.”

In the main body of the report, paragraph 5.34 concluded as follows on this site:

“Although the site is located near to Apsley station, it is on the western side of the railway line and is therefore separate from the established employment areas. There is no clear solution to this access issue. The proximity of heritage assets is likely to limit the scope for employment development and while it is being promoted through the call for sites, it is anticipated that the focus will be on residential uses if any land is released from the green belt.”

Paragraph 7.2 in the report states that:

“...At present office development is not viable in Hemel Hempstead town centre or at Maylands; and in locations where it may be viable (Apsley and Hemel Hempstead Station Gateway), there is currently little or no land available.”

4. South West Hertfordshire Economic Study Update (Hatch Regeneris, September 2019)

The site was assessed in Appendix D on pages D-19 and D-20. The following conclusion was drawn:

“The site is sizeable and benefits from access to a strong labour pool. However there are access and environmental constraints that are likely to limit its potential as an employment location. A small portion of the site may be suitable for employment in the form of B1 uses as part of any residential led scheme.”

Table 8.11 in the main body of the report draws a similar conclusion on the site.

5. Draft ‘Schedule of Site Appraisals (for Large Greenfield Sites)’ (DBC, November 2017)

The Local Plan Issues and Options consultation document was accompanied by the draft ‘Schedule of Site Appraisals (for Large Greenfield Sites)’. This was the Council’s initial assessment of sites which were currently in the Green Belt or Rural Area and had been put forward by developers and landowners for either housing and/or employment use. Land at Shendish was referred to as site HH-h3 and assessed on pages 25-29 as a potential housing site (900 homes), with 2 hectares of employment development.

Liaison with landowners

Owners

W Lamb Ltd

Call for Sites

On 24 March 2014, Boyer Planning (on behalf of the landowners) wrote to the Council to promote the site for housing development.

Landowner meetings

A meeting with between the Council, the landowners and Boyer Planning was held on 11 April 2017. Main points to note:

- The estimated net developable area is 65 hectares and this could yield an estimated 900 homes. An employment element of 2 ha was also being considered.
- The sensitive relationship of the site to Shendish Manor was an important factor, but the eastern section of the land was identified as a less well performing Green Belt area in the Council's Green Belt review study.
- The Council raised concerns over the potential access to the land, but Peter Vallis explained that there were a number of options to resolve this.

Landowner's response to Dacorum Local Plan Issues and Options Consultation (2017)

See 'Planning policy context and planning history' above.

New information from landowners (February 2019)

A letter from Boyer Planning to the Council dated 1 February 2019 stated that:

"We are now proposing a much reduced area for Green Belt release that broadly matches the "refined sub area" (D-S3) identified for further consideration in the Council's Stage 2 Green Belt Review..."

Boyer Planning's letter stated that the area proposed for allocation could accommodate around 500 homes. No employment development was proposed. The letter was accompanied by a number of technical studies, including a Transport Appraisal and Heritage Assessment, which sought to address the Council's concerns about the development of the site.

Estimated potential employment floorspace

The Council's Site Assessment Study (AECOM, January 2020) states that the net developable area of the eastern part of the site is 25.3 hectares.

Assuming a plot ratio of 0.8 for offices and 0.4 for industrial development, as recommended in the South West Hertfordshire Economic Study Update, the site could accommodate a very large amount of employment floorspace. Office development would be most appropriate in this location. However, if the site was released from the Green Belt, it is very unlikely that it would be developed purely for employment purposes.

Conclusion

The location of the eastern part of the site next to Apsley Station means that it is one of the very few sites in Dacorum where office development might be viable. Also, the eastern part of the site makes only a weak contribution to the Green Belt purposes.

However, there are a number of concerns that lead the Council to conclude that the site should not be proposed for employment development in the Local Plan:

- It is located across the railway line from established employment areas and there is no market evidence to suggest it would be deliverable if allocated for employment.
- The Council is unconvinced that development on the eastern part of the site would not cause serious harm to the landscape, ecology and heritage importance of Shendish Manor and its parkland.
- The landowners are promoting the site for housing development, although they have indicated that it could include a small employment element of about 2 hectares.
- The existing road access is poor and it is uncertain whether satisfactory measures can be introduced to improve the access. Also, London Road close to the site suffers from serious traffic congestion.

London Road (between Doolittle Meadows and Red Lion PH), Hemel Hempstead

Site Location

Site area: 1.05 ha. excluding Red Lion PH; up to around 1.4 ha. if part of Red Lion PH land included

Existing land use

Unused land (partly wooded) and public house grounds.

Planning policy context and planning history

Dacorum Borough Local Plan 1991-2011 (2004)

The site is located in the Green Belt. The Policies Map also shows the site as being in an Article 4 area. However, the Article 4 area (Kings Langley/Nash Mills) covers a large area and deals with agricultural development. It is no longer relevant to the site, as it is not in agricultural use.

Dacorum Core Strategy (2013)

Policy CS5 (Green Belt) is particularly relevant.

Dacorum Site Allocations Development Plan Document (2017)

Retained in the Green Belt.

Dacorum Local Plan Issues and Options Consultation (2017)

The site was not referred to as a possible employment site in section 7 of the consultation document. Neither was it listed in section 10.8 as a potential key development site.

Planning history

No relevant planning history.

Evidence base studies

1. Green Belt Review

(i) Stage 1: Green Belt Purposes Assessment (Sinclair, Knight, Merz, November 2013)

This study provided a strategic review of Green Belt land in Dacorum, St Albans and Welwyn Hatfield Councils to identify its contribution towards the national Green Belt purposes in the NPPF. It identified areas of Green Belt land which were considered to contribute least towards national purposes. However, it stressed the need for further studies to identify precise revised Green Belt boundaries.

The London Road site was not identified in chapter 8 as being in a sub-area containing land contributing least towards Green Belt purposes.

(ii) Stage 2 Green Belt Review and Landscape Appraisal (ARUP, January 2016)

This study of Dacorum provided a more detailed assessment than stage 1. It highlighted areas which were performing least well against Green Belt purposes and were least sensitive in landscape terms.

The London Road site formed a small part of Sub-Area HH-12. Table 5.2 (page 54) indicated that HH-12 contributed moderately to the Green Belt purposes. Table 5.4 indicated on page 75 that part of HH-12 including the London Road site should be excluded from further assessment for possible removal from the Green Belt, because:

“The far south-western part of the sub-area is heavily flood constrained and noted in the purposes assessment as particularly important for preventing coalescence between Hemel Hempstead and Kings Langley and ribbon development along Lower Road, thus land west of Lower Road to be excluded...”

(iii) Stage 3 Green Belt Review (ARUP, August 2020)

The Stage 3 review assessed potential housing and employment site allocations that lie within the Green Belt. For each site, it advised on where the new Green Belt boundary should be defined if the site is released from the Green Belt and whether the boundary should be strengthened. Table 4.1 in the main report summarised the site by site findings.

The assessment of the London Road site (site 66), excluding the Red Lion PH, can be found on page 42 in Annex A.

2. Site Assessment Study (AECOM, January 2020)

This study assessed 144 greenfield sites identified by the Council as having potential for residential or employment development. Most of the London Road site is in Site 66 in Volume 3 (Final Site Schedules) and the following points are particularly relevant:

“**Transport conclusion:** The site is accessible from the local road network (London Road); good access to public transport and local facilities.

Flooding conclusion: The River Bulbourne flows along the eastern edge of the site. The site is within Flood Zone 2 Medium Probability of fluvial flooding on the Flood Map for Planning and a site specific Flood Risk Assessment is required to accompany a planning application. Modelling information from the Environment Agency should be reviewed to determine whether this watercourse has been modelled and if not, modelling may need to be undertaken to determine whether there is a risk that could impact the site, including an allowance for climate change. The site is shown to be susceptible to surface water flooding. Flow routing and drainage requirements must be considered early in the site planning process to ensure the risk is effectively managed on site and the risk to neighbouring areas is not increased and where possible is reduced. The site is shown to be at residual risk of reservoir flooding. This should be investigated further as part of a site specific Flood Risk Assessment.

Landscape and visual impact:...the site is judged to perform well on this criterion as a result of the flat landform and relationship to settlement.

Economic development potential: The area where the site is located, to the south of Hemel Hempstead near Apsley Station, contains a good concentration of businesses with a very well-qualified labour force that are in high-level occupations. This concentration of businesses suggests the site is able to attract to employers. The good-quality workforce travelling to this location is further evidence of this and a major benefit to potential employers. The nearby Apsley train station provides access via train which is considered crucial by some employers to attract the desired workforce, and the station provides direct access to London Euston. The site also has very good access from the local bus services. The Dacorum Employment Land Availability Assessment shows that Apsley has low vacancy compared to the rest of the Dacorum market, has access to quality housing which is attractive to those holding high-level occupations and has attracted occupiers such as Epson in the near vicinity. The proximity to other productive businesses means that this site is likely to have agglomeration benefits. The assessment identifies that Apsley provides better opportunities for future development than much of the Borough. The site therefore, has the potential for economic development with few or no constraints.

Spatial opportunities and constraints defensible boundary potential: The site would be within the existing defensible boundaries of Hemel Hempstead.

Overall site conclusion – comments: Site considered suitable for residential or employment use. While its existing contribution to Green Belt purposes is strong, it performs sufficiently well on other criteria to enable it to be considered potentially suitable for allocation with major constraints.

Overall site conclusion- final rating: Potentially suitable for allocation with major constraints.”

3. Dacorum Employment Land Availability Assessment (PBA, October 2017)

The London Road site was not assessed.

4. South West Hertfordshire Economic Study Update (Hatch Regeneris, September 2019)

The London Road site was not assessed.

5. Draft 'Schedule of Site Appraisals (for Large Greenfield Sites) (DBC, November 2017)

The Local Plan Issues and Options consultation document was accompanied by the draft 'Schedule of Site Appraisals (for Large Greenfield Sites)'. This was the Council's initial assessment of sites which were currently in the Green Belt or Rural Area and had been put forward by developers and landowners for either housing and/or employment use. However, the London Road site was not appraised.

Liaison with landowners

None. Contact will be made with the landowners before the Local Plan is published.

Note: it is understood that part of the Red Lion PH car park is leased to Hertfordshire County Council for their office workers.

Estimated potential employment floorspace

The Council's Site Assessment Study (AECOM, January 2020) stated that the net developable area of Site 66 is 0.85 hectares. If part of the Red Lion PH grounds are added, the total developable area would probably be around 1.1 hectares.

Assuming a plot ratio of 0.8 for offices and 0.4 for industrial development, as recommended in the South West Hertfordshire Economic Study Update, the site could accommodate around:

- 6,800 sq. metres of offices or 3,400 sq. metres of industrial space, excluding any Red Lion land.
- 8,800 sq. metres of offices or 4,400 sq. metres of industrial space, including part of the Red Lion site.

Conclusion

The evidence shows that:

- The site is well located for employment development, close to existing employment areas and with good transport access.
- It is within the defensible boundaries of Hemel Hempstead.
- Development would have a low landscape and visual impact.

However, there are a number of concerns that lead the Council to conclude that the site should not be proposed for employment development in the Local Plan Emerging Strategy for Growth, but that further consideration should be given to the site before the Local Plan is published:

- The Green Belt Review Stage 2 report concluded that the site should remain in the Green Belt, as it is part of a wider sub-area that contributes moderately to the Green Belt purposes. Nevertheless, it is clear that the site contributes far less to the Green Belt purposes than the rest of the sub-area. Therefore, it is intended that the site will be assessed as part of the Green Belt Review Stage 3 study before the Local Plan is published.
- A small area of the site appears to be within Flood Zone, 2 with a yet smaller part possibly in zone 3. The flooding issues will be explored further in the Dacorum Strategic Flood Risk Assessment before the Local Plan is published and, if necessary, discussions will take place with the Environment Agency and Hertfordshire County Council (as lead flood authority).
- There has not yet been any engagement between the Council and the landowners. This will be rectified prior to publication of the Local Plan.

Chesham Road, north of A41 Junction, Berkhamsted

Site Location

Site area: 2.6 ha.

Existing land use

Agricultural.

Planning policy context and planning history

Dacorum Borough Local Plan 1991-2011 (2004)

The site is located in the Green Belt.

Dacorum Core Strategy (2013)

Policy CS5 (Green Belt) is particularly relevant.

Dacorum Site Allocations Development Plan Document (2017)

Retained in the Green Belt.

Dacorum Local Plan Issues and Options Consultation (2017)

The Chesham Road site was not put forward as a possible employment site in section 7 of the consultation document. However, paragraph 10.8.1 referred to the Council's initial assessment of potential key development sites in the draft Schedule of Site Appraisals that was published alongside the consultation. The wider South of Berkhamsted site was considered in the draft site appraisals document as a possible housing led development including some offices – for further information see point 5 in 'evidence base studies' below.

Question 46 in the consultation document asked:

“Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisal working note which accompanies it?”

There was very substantial opposition to development South of Berkhamsted for a range of reasons, including loss of Green Belt and inadequate infrastructure in Berkhamsted.

Grand Union Investments (landowners)) submitted a response to the consultation document, concluding that the South of Berkhamsted site should be excluded from the Green Belt and allocated for housing led development.

Planning history

No relevant planning history.

Evidence base studies

1. Green Belt Review

(i) Stage 1: Green Belt Purposes Assessment (Sinclair, Knight, Merz, November 2013)

This study provided a strategic review of Green Belt land in Dacorum, St Albans and Welwyn Hatfield Councils to identify its contribution towards the national Green Belt purposes in the NPPF. It identified areas of Green Belt land which were considered to contribute least towards national purposes. However, it stressed the need for further studies to identify precise revised Green Belt boundaries.

Figure 8.1 identified land contributing least towards Green Belt purposes, one of these areas being sub-area D-S2 (Land enclosed by A41 and southeast Berkhamsted) which includes the Chesham Road site. Paragraph 8.2.2 explained that the:

“...land enclosed by the A41 and southeast Berkhamsted is considered to contribute least towards the five Green Belt purposes. A reduction in the size of the strategic parcel would not significantly compromise the primary functions of the Green Belt or compromise the separation of existing settlements. The sub-area identified displays some strong urban influences as a result of being enclosed by the A41 and the edge of the residential area of Berkhamsted. It also contains a range of largescale built development including Ashlyns School and BFI National Archives, both of which are designated as Major Developed Sites in the Green Belt. Existing landscape planting and buffering is strong and this limits the visual appearance and views of physical features. It is noted that a small section of this strategic parcel is allocated for future removal from the Green Belt to accommodate new housing and associated development (Local Allocation LA4 within Dacorum’s Core Strategy).”

(ii) Stage 2 Green Belt Review and Landscape Appraisal (ARUP, January 2016)

This study of Dacorum provided a more detailed assessment than stage 1. It highlighted areas which were performing least well against Green Belt purposes and were least sensitive in landscape terms.

The Chesham Road site formed a small part of Sub-Area D-S2b. Table 5.2 (page 54) stated that D-S2b contributed weakly to the Green Belt purposes. Table 5.4 indicated on page 70 that D-S2b was being taken forward for further assessment because it meets Green Belt purposes weakly and the only constraints (local wildlife site; listed building) are not absolute constraints.

The Landscape Appraisal concluded (page 95) that the overall sensitivity of this landscape was medium and that the western part (including the Chesham Road site) was:

“...markedly lower in sensitivity due to the heightened presence of the urban fringe (playing fields and play park) and its lack of relationship to the wider landscape.”

Chapter 7 (recommendations) identified a series of sub-areas which should be given further consideration by the Council. Table 7.1 included the D-S2b as a ‘less constrained area for further consideration. It advised that:

“...around the Ashlyns Hall Estate, opportunities have been identified for restoration, enhancement and better interpretation of the historic parklands, which should be taken into account in any assessment work...Any future assessment work should take into consideration: the setting of the Grade II* listed Ashlyns Hall...”

(iii) Stage 3 Green Belt Review (ARUP, August 2020)

The Stage 3 review assessed potential housing and employment site allocations that lie within the Green Belt. For each site, it advised on where the new Green Belt boundary should be defined if the site is released from the Green Belt and whether the boundary should be strengthened. Table 4.1 in the main report summarised the site by site findings.

The assessment of the South of Berkhamsted site (site 2), including the Chesham Road site, can be found on page 10 in Annex A.

2. Site Assessment Study (AECOM, January 2020)

This study assessed 144 greenfield sites identified by the Council as having potential for residential or employment development. The Chesham Road site was not assessed, but it adjoins Site 2 (South Berkhamsted Urban Extension) in Volume 3 (Final Site Schedules). The following points are particularly relevant in relation to Site 2:

“Economic development potential: The area has attracted a strong concentration of employers, particularly in knowledge-based sectors, which contain a very well qualified workforce in high-level occupations. The workplace data suggests workers live fairly close by to their place of work. The Adopted Core Strategy identifies Berkhamsted as a "place with limited opportunity" for economic development. However, this site could extend Berkhamsted to the south and become a greater focus for homes and jobs as suggested in the Local Plan Issues and Options Consultation 2017.

Overall site conclusion – comments: Site performs generally well across all criteria except heritage, and it is considered there is potential to mitigate some heritage constraints. Site is also in Green Belt but away from AONB. As such, site is considered potentially suitable for allocation with minor constraints.

Overall site conclusion- final rating: Potentially suitable for allocation with minor constraints.”

3. Dacorum Employment Land Availability Assessment (PBA, October 2017)

Appendix C contains an assessment of the site on pages 223-225 (site P4). The following recommendations were made:

“Should the site be identified for potential employment use? No.

Reasons/comments: There is no clear evidence of market demand in this location. It is unclear whether an allocation would be taken up.

The assessment of this site in Appendix C also stated that “The site lacks critical mass and may not prove attractive to the market”.

In the main body of the report, paragraph 5.34 concluded as follows on this site:

“while this green belt (2.6 ha) site is located near to some existing employment sites, these sites have arisen through circumstance rather than representing a significant focus for employment or an area where the market is seeking more space. Additionally, we are

aware that the site forms part of the large south of Berkhamsted site, which is being promoted for residential-led development by developers in the single Local Plan. For these reasons, we think this site would not be deliverable during the plan period.”

4. South West Hertfordshire Economic Study Update (Hatch Regeneris, September 2019)

The Chesham Road site was not assessed.

5. Draft ‘Schedule of Site Appraisals (for Large Greenfield Sites) (DBC, November 2017)

The Local Plan Issues and Options consultation document was accompanied by the draft ‘Schedule of Site Appraisals (for Large Greenfield Sites)’. This was the Council’s initial assessment of sites which were currently in the Green Belt or Rural Area and had been put forward by developers and landowners for either housing and/or employment use.

The Chesham Road site formed a small part of site Be-h1 and was assessed on pages 34-38 as a potential housing led development site (c. 970 homes), with other uses including offices.

Liaison with landowners

Owners

Grand Union Investments (GUI)

Landowner meetings

A meeting between the Council, GUI and Savills (GUI’s planning consultants) took place on 30 March 2017. Further meetings with the same parties plus Taylor Wimpey (potential delivery partner) were held on 25 October and 27 November 2019. The 2017 meeting discussed the possibility of the development including some start-up office space, as part of a residential led scheme. However, the 2019 meetings did not cover the potential inclusion of an office element.

Estimated potential employment floorspace

Assuming a plot ratio of 0.8 for offices and 0.4 for industrial development, as recommended in the South West Hertfordshire Economic Study Update, the site could accommodate around 20,800 sq. metres of offices or 10,400 sq. metres of industrial space. However, the site seems unlikely to be attractive for offices.

Conclusion

The site makes a weak contribution to the Green Belt and forms part of the wider South of Berkhamsted which is proposed for housing led development in the Local Plan Emerging Strategy for Growth consultation document (Growth Area Tr01).

Employment development is not proposed on the site in the consultation document because:

- The Dacorum Employment Land Availability Assessment recommended that the site should not be identified for employment development, as there is no clear evidence of market demand in this location and it is unclear whether an allocation would be taken up. Also, the site lacks critical mass.
- The site is not well served by public transport, so is unlikely to be commercially attractive for office development.
- Industrial development would be likely to harm the setting of the adjoining grade 11* listed Ashlyns Hall and the attractive approach into south Berkhamsted from the A41.
- The landowners are promoting the wider South of Berkhamsted site for housing led development, not employment development.

Dunsley Farm, London Road, Tring

Site Location

Site area: 37.25 ha.

Existing land use

Mainly agricultural. 1.6 hectares of land fronting London Road in the west of the site is in industrial/commercial use, including Tring Brewery Company.

Planning policy context and planning history

Dacorum Borough Local Plan 1991-2011 (2004)

The site is located in the Green Belt.

Dacorum Core Strategy (2013)

Policy CS5 (Green Belt) is particularly relevant.

Dacorum Site Allocations Development Plan Document (2017)

Retained in the Green Belt.

Paragraph 8.13 refers to wildlife sites and Appendix 5 contains a link to the schedule of these sites. Part of the eastern half of the site is designated as a wildlife site is designate as a wildlife site, as shown in the Site Allocations Map Book (page 115).

Dacorum Local Plan Issues and Options Consultation (2017)

Paragraph 7.33 in the consultation document summarised the conclusions of the Dacorum Employment Land Availability Assessment on land for industrial and warehousing uses, including that:

- The Council should allocate a portfolio of local quality sites in excess of current allocations. There are potential sites near the A41, but these locations are not attractive for large warehouses.
- Suitable sites are east of the A41 at Two Waters, Hemel Hempstead (5.6 hectares) and Dunsley Farm, Tring (up to 5 hectares). Both sites have good access to the A41 and could accommodate small and medium sized industrial and warehouse units.

Paragraph 7.34 stated that the Council considered it sensible to accept the recommendations of the land availability assessment and that the need for additional employment land justified changes to the Green Belt in these areas.

Paragraph 10.8.1 in the consultation document referred to the Council's initial assessment of potential key development sites in the draft Schedule of Site Appraisals that was published alongside the consultation. The Dunsley Farm site was considered in the draft site appraisals document – for further information see point 5 in 'evidence base studies' below.

Question 22 in the consultation document asked:

“Do you agree with the proposed approach to choosing sites to accommodate future jobs growth?”

The main points raised in the responses to Question 22 about the Dunsley Farm site are summarised below (see Appendix 2 for a fuller summary):

Response from	Answer to question	Main points made
Hertfordshire County Council (Environment Department)	No	Dunsley Farm, Tring – served by 500 bus route
Hertfordshire County Council (Development services, Property, Resources)	No	As a landowner, HCC supports the approach to the delivery of additional employment sites. Dunsley Farm, Tring Any new employment land should not be limited B1(c), B2 and B8 units. Preventing B1 (a) office use might make site less responsive to market demand.
CPRE – The Hertfordshire Society	No	The need for jobs is not an “exceptional circumstance” to justify using Green Belt land for employment use.
Grove Fields Residents Association (Tring)	No	Given the natural limitations at Tring, it would not be appropriate to remove land from the Green Belt at Dunsley Farm for industrial and warehousing uses, which the town does not necessarily have the capacity to support.
Tring in Transition	No	We do not support employment development at Dunsley Farm, Tring, because the inclusion of warehousing is inappropriate.
Tring Town Council	No	The emphasis on industrial and, in particular warehousing, is wrong. More sustainable growth would be achieved at Dunsley Farm through commercial and light industrial/high tech businesses. This would also be more appropriate to the town gateway site.
General public	No	General comments Green Belt sites should not be used. Comments on Dunsley Farm This site is unacceptable for employment development for various reasons, including:

- | | | |
|--|--|---|
| | | <ul style="list-style-type: none"> • The loss of Green Belt would harm an attractive gateway into the town. • Tring is not a suitable location for large scale industrial and warehousing development, particularly of large 'sheds'. • There is no need for new employment land in Tring. |
|--|--|---|

Planning history

No relevant planning history.

Evidence base studies

1. Green Belt Review

(i) Stage 1: Green Belt Purposes Assessment (Sinclair, Knight, Merz, November 2013)

This study provided a strategic review of Green Belt land in Dacorum, St Albans and Welwyn Hatfield Councils to identify its contribution towards the national Green Belt purposes in the NPPF. It identified areas of Green Belt land which were considered to contribute least towards national purposes. However, it stressed the need for further studies to identify precise revised Green Belt boundaries.

Annex 1 contains the assessment for Dacorum. The Dunsley Farm site formed part of Strategic Parcel 04, which was considered to make a significant contribution to the Green Belt purposes.

(ii) Stage 2 Green Belt Review and Landscape Appraisal (ARUP, January 2016)

This study of Dacorum gave a more detailed assessment than stage 1. It highlighted areas which were performing least well against Green Belt purposes and were least sensitive in landscape terms.

The Dunsley Farm site was called site TR-A5 and Table 5.2 (page 54) indicated that this site contributed moderately to the Green Belt purposes.

The Landscape Appraisal concluded (page 95) that the overall sensitivity of this landscape was **medium** and the report stated that:

“The overall sensitivity of this landscape to residential development is judged medium by virtue of its degraded character, management and the presence of urban fringe influences. A degree of sensitively designed and sited development which avoided adverse impact on the adjacent historic landscape settings, could potentially be used to enhance the approach to the town at London Road.”

However, following further a re-assessment against the purposes of the Green Belt in the NPPF, it was concluded in Table 5.6 in relation to site TR-A5 that:

“Sub-area may partially compromise the ability of the wider Green Belt to meet its purposes but includes an area of weaker Green Belt - consider part of the sub-area further.”

Map 5.16 shows that only the northern half of TR-A5 was considered worthy of further consideration.

Chapter 7 (recommendations) identified a series of Green Belt sub-areas which should be given further consideration by the Council. Table 7.2 included the northern part of site TR-A5 as a ‘less constrained area for further consideration’ and advised that:

“...The further refined sub-area does not compromise the ability of the wider Green Belt to meet its purposes, nor is it judged to be highly sensitive to change in landscape terms. Existing historic hedgerows and the hard boundaries of properties would provide robust and defensible boundaries for the Green Belt. Any future assessment work should take into consideration the Cow Lane Farm Meadows local wildlife site in the east of the further refined sub-area.”

(iii) Stage 3 Green Belt Review (ARUP, August 2020)

The Stage 3 review assessed potential housing and employment site allocations that lie within the Green Belt. For each site, it advised on where the new Green Belt boundary should be defined if the site is released from the Green Belt and whether the boundary should be strengthened. Table 4.1 in the main report summarised the site by site findings.

The assessment of the Dunsley Farm site (site 122) can be found on page 70 in Annex A.

2. Site Assessment Study (AECOM, January 2020)

This study assessed 144 greenfield sites identified by the Council as having potential for residential or employment development. The Dunsley Farm site is Site 122 in Volume 3 (Final Site Schedules). The northern half of Site 122 is referred to as Site 122a. The following points in the study are particularly relevant:

“Economic development potential – The businesses located in proximity to the site attract a very well-qualified workforce that hold highlevel occupations. The workers for these businesses tend to live fairly close by and travel sustainably for the area. In addition, the

site is located next to Tring Station providing good access to the site. Tring is identified as a "place with limited opportunity" for economic development in the Core Strategy. In addition, a similar site to this was assessed within the Dacorum Land Availability Assessment 2017 which suggested it was not viewed as an office location by the market however, there is potential for local industrial uses. Therefore, the site does appear to be suitable for economic development with housing developments close by allowing Tring to become a focus for homes and jobs as suggested in the Local Plan Consultation 2017."

Overall site conclusion – comments: Site's most significant constraints are flood risk, Local Wildlife Site across half of the site, Green Belt and the setting of the AONB, as well as environmental features. Other than these, site performs relatively well. Given that the Local Wildlife Site is the most fundamental of these constraints and is not able to be mitigated, it is recommended that site boundaries are amended to form a new site 122a that includes only the western half of the site, thus excluding the Local Wildlife Site. While it is noted that there is some land in the east of the original site that is not within the wildlife designation, the necessary boundary amendment would act to cut this land off from the rest of the site and thus development in this location would form isolated new houses in the countryside away from the settlement edge, which is resisted by national policy. The allocation of 122a could be offset by compensatory improvements to that part of the site not allocated but remaining within the Green Belt and in the same ownership, in line with NPPF paragraph 138. Site 122a is therefore considered to be potentially suitable for allocation with major constraints.

Overall site conclusion - final rating: Site 122a only is potentially suitable for allocation with major constraints."

3. Dacorum Employment Land Availability Assessment (PBA, October 2017)

Appendix C contains an assessment of the site on pages 226-228 (site P5). The following recommendations were made:

"Should the site be identified for potential employment use? Maybe/depends.

Reasons/comments: Potential to form an extension to the existing commercial development or a new employment site immediately north of the London Road/A41 junction for local industrial uses in Tring. However, there is limited evidence that new build would be viable so it may need to come forward as part

` of a mixed-use development with other uses to cross subsidise employment floorspace.

Any further advice: In the event of such an application, the Council should use planning obligations to ensure delivery of any employment space."

In the main body of the report, paragraph 5.34 concluded as follows on this site:

“there are some existing small-scale employment uses in the west of this green belt site. The site is substantial (39 ha) and, because the location is more suited to the local market, it is not considered suitable for a large-scale employment location. DBC should consider allocating it as a contingency location by expanding the existing employment area for local industrial uses.”

Paragraph 5.44 is also relevant:

“We also consider that DBC should consider allocating further sites for local industrial occupiers to allow for churn and choice e.g. where existing sites are approaching the end of their viable lifespans and might be more suited to redevelopment for alternative uses, providing a pipeline of local quality sites would allow this to happen. We consider that sites on the A41 corridor, specifically at Tring and Two Waters (Hemel Hempstead) in proximity to existing employment uses, could be considered by DBC as potential employment allocations.”

In addition, paragraph 6.22 recommended that:

“...for qualitative reasons, DBC should consider allocating additional land for local industrial uses (unit sizes of less than 1,858 sqm) on land at Dunsley Farm (Tring) and land north east of A41 at Two Waters (Hemel Hempstead). Again though, these allocations will need to be balanced against competing land uses and green belt release.”

4. South West Hertfordshire Economic Study Update (Hatch Regeneris, September 2019)

The site is assessed in Appendix D on pages 167-169. The following conclusion was drawn:

“The site is sizeable and benefits from access to a strong labour pool. However there are access and environmental constraints that are likely to limit its potential as an employment location. A small portion of the site may be suitable for employment in the form of B1 uses as part of any residential led scheme.”

In the main body of the report, Table 8.11 provided a summary of the conclusions from the site reviews in Appendix D, including the following on Dunsley Farm:

Area with development potential (ha.)	Potential uses	Comments
35.1	B1c, B2, B8	Green Belt site which has poor accessibility to the strategic road network but could experience medium to long term demand from local industrial market.

5. Draft 'Schedule of Site Appraisals (for Large Greenfield Sites) (DBC, November 2017)

The Local Plan Issues and Options consultation document was accompanied by the draft 'Schedule of Site Appraisals (for Large Greenfield Sites)'. This was the Council's initial assessment of sites which were currently in the Green Belt or Rural Area and had been put forward by developers and landowners for either housing and/or employment use. Dunsley Farm was referred to as site Tr-h5 and assessed on pages 89-92 as a potential site for mixed development, including employment and residential.

Liaison with landowners

Owners: Hertfordshire County Council

Landowner meetings

A meeting between the Council and Hertfordshire County Council took place on 5 April 2017. One of the issues explored at the meeting was:

"The site's potential to provide for future employment land in the town (c.5ha of mixed B1/B2/B8 uses) if the recommendations of the employment study are taken forward."

County Council's response to Issues and Options consultation (2017)

Hertfordshire County Council's response to the Borough Council's Local Plan Issues and Options consultation document and Call for Sites included the following documents:

- Covering statement (Lambert Smith Hampton)
- Landscape and Visual Impact Assessment Opportunities and Constraints BDP)

Points to note in the covering statement are:

- Paragraph 1.5 stated that:

"It should be emphasised that HCC has explicitly identified that any additional employment area should facilitate the retention and expansion of existing employment opportunities at Dunsley, for example Tring Brewery Company."

- Paragraph 3.2 states that the BDP report contained an Initial Development Assessment. Key principles included:

"Employment area can be expanded (and provided with a new access from London Road). That area to be located adjacent to London Road, and offering good access to Tring Town centre."

- This led to two development scenarios described at a high level in the feasibility work, both of which included:
 - Existing Employment area 1.6 ha
 - Employment area extension 5.4 ha

Further liaison

Since the 2017 submission, the following additional technical reports have been produced for the County Council:

- Archaeological Desk Based Assessment (CgMs, June 2019)
- Preliminary Ecological Assessment (Geosphere Environmental, June 2019)
- Topographical Survey (Randell Surveys, July 2019)
- Phase 1 Contamination Report – Desk Study and Preliminary Risk Assessment (June 2019)
- High Level Accessibility Transport Assessment (Stomar)

Estimated potential employment floorspace

It depends on the size of the employment allocation as part of a mixed use development. Assuming 5 hectares of new employment land and a plot ratio of 0.8 for offices and 0.4 for industrial development, as recommended in the South West Hertfordshire Economic Study Update, the site could accommodate around 40,000 sq. metres of offices or 20,000 sq. metres of industrial space.

In this location, it seems probable that most if not all the floorspace would be industrial rather than offices.

New Local Plan: conclusion

The site is well located for employment development and an employment allocation on part of the site is supported by the landowners. The market is expected to favour small and medium sized industrial units, rather than offices.

Therefore, the site is proposed for mixed use development in the Local Plan Emerging Strategy for Growth consultation document (Growth area Tr01), including:

“A General Employment Area in the west of the site fronting London Road, consisting of 5.4 ha of new employment land (providing around 20,000 sq. metres of office, industrial and storage or industrial floorspace) and 2 ha of land already partly in industrial/commercial use (including Tring Brewery), which has scope for further small-scale employment development.”

There is uncertainty over the amount of floorspace, as it is not known whether there will be further employment development in the existing area around Tring Brewery and because the proposals for Dunsley Farm in the consultation document also state that:

- A supermarket will be encouraged within the General Employment Area, but only if a supermarket cannot be delivered in Tring town centre on the High Street/Brook Street site (Growth Area Tr06) and it would not have a significant adverse impact on the town centre.
- A new fire and rescue station to replace the existing facility on Growth Area Tr06 would be another acceptable use within the General Employment Area.

The position may be clearer by the time the publication version of the Local Plan is produced.

Wayside Farm, Watford Road, Kings Langley

Site location

Site area: 46.6 ha.

Existing land use

Agricultural.

Planning policy context and planning history

Dacorum Borough Local Plan 1991-2011 (2004)

The site is located in the Green Belt.

Dacorum Core Strategy (2013)

Policy CS5 (Green Belt) is particularly relevant.

Dacorum Site Allocations Development Plan Document (2017)

Retained in the Green Belt.

Dacorum Local Plan Issues and Options Consultation (2017)

Paragraph 7.32 in the consultation document summarised the conclusions of the Dacorum Employment Land Availability Assessment on land for offices, as follows:

- Around 18 hectares of new office development are required to achieve the proposed level of office job growth, based on revised calculations.
- The only option for significant new office development in Dacorum is located south west of Kings Langley (west of Watford Road). This site appears attractive for offices, because of its proximity to Kings Langley station, bus routes and M25 Junction 20.
- The Council could allocate about 18 hectares on the Kings Langley site to meet Dacorum's own needs, or possibly a larger area to meet wider South West Hertfordshire needs.
- The site in St Albans District at Green Lane, Hemel Hempstead next to M1 Junction 8 also has potential to meet wider South West Hertfordshire needs. Green Lane is likely to be brought forward for development in the near future. Consequently, the Kings Langley site should be held in reserve and brought forward if Green Lane fails to attract significant office development.

Paragraph 7.34 stated that the Council considered it sensible to accept the recommendations of the land availability assessment and that the need for additional employment land justified changes to the Green Belt in these areas, including at South West Kings Langley (i.e. Wayside Farm).

Paragraph 7.36 expanded on the Council's thinking concerning Wayside Farm:

“A key issue that still needs further consideration is the scale and timing of any employment development on the Kings Langley site. Our initial view is that about 18 hectares of land should be designated as ‘safeguarded land’ for possible long-term office development. This means that offices will not be permitted unless a clear need is demonstrated in the future following a Local Plan review. The land would continue to be farmed in the meantime. One of the reasons for this approach is that we don't want to jeopardise the success of the Enterprise Zone at Maylands by having another large new employment site under construction at Kings Langley at the same time. We will need to consider whether the new Local Plan should include specific policies relating to this Enterprise Zone.”

Paragraph 10.8.1 in the consultation document referred to the Council's initial assessment of potential key development sites in the draft Schedule of Site Appraisals that was published alongside the consultation. The Wayside Farm site was considered in the draft site appraisals document – for further information see point 5 in ‘evidence base studies’ below.

Question 22 in the consultation document asked:

“Do you agree with the proposed approach to choosing sites to accommodate future jobs growth?”

The main points raised in the responses to Question 22 about the Wayside Farm site are summarised below (see Appendix 2 for a fuller summary):

Response from	Answer to question	Main points made
Hertfordshire County Council (Environment Department)	No	SW Kings Langley - served by 500 bus route (key inter-urban route in the county with a regular timetable and good coverage of the day and the site is close to the rail station).
Hertfordshire County Council (Development services, Property, Resources)	No	<p>As a landowner, HCC supports the approach to the delivery of additional employment sites.</p> <p>Wayside Farm, Kings Langley Wayside Farm is well located, close to Kings Langley station and M25 Junction 20.</p> <p>The developable area of the site is constrained as parts of the site are visually prominent.</p> <p>Highways congestion and capacity issues on the A4251 and at Junction 20, may also constrain development potential. The South West Herts Growth and Transport Plan (consultation due early 2018), will propose measures to address the capacity issues. However, highways issues may severely constrain the scale of development possible. Further work/discussion are needed to confirm deliverability at anything other than a relatively small scale.</p> <p>Subject to addressing these issues, Wayside Farm could help meet employment needs earlier than the 2036 date in the Issues and Options consultation, particularly as proximity to Kings Langley railway station makes the site attractive to the market.</p>
St Albans District Council	No	Given the East Hemel Hempstead proposal, the possible further greenfield office development at Kings Langley is hard to justify, even as ‘safeguarded land’ for the long term. It could also undermine the success of the East Hemel Hempstead site (especially the office part) and the scope for public transport improvements there. The exceptional circumstances required to release the Kings Langley site from the Green Belt for employment use do not appear to exist.

CPRE – The Hertfordshire Society	No	The need for jobs is not an “exceptional circumstance” to justify using Green Belt land for employment use.
General public	No	<p>General comments</p> <p>Green Belt sites should not be used.</p> <p>Comments on Wayside Farm</p> <p>This site is unacceptable for office development, for various reasons including:</p> <ul style="list-style-type: none"> • The loss of this Green Belt land would damage the historic character of Kings Langley, visually harm the rural approach to the village and represent a major outward expansion of the village, extending Kings Langley to the M25 and closer to Watford. • Wayside Farm is a working dairy farm, with a farm shop which sells produce including raw milk. • The public footpaths across Wayside Farm are well used. • There is already serious traffic congestion at M25 Junction 20, with long queues on the A41 and on the A4251 extending back into Kings Langley.
<p>Planning history</p> <p>No relevant planning history.</p>		
<p><u>Evidence base studies</u></p> <p>1. Green Belt Review</p> <p>(i) Stage 1: Green Belt Purposes Assessment (Sinclair, Knight, Merz, November 2013)</p>		

This study provided a strategic review of Green Belt land in Dacorum, St Albans and Welwyn Hatfield Councils to identify its contribution towards the national Green Belt purposes in the NPPF. It identified areas of Green Belt land which were considered to contribute least towards national purposes. However, it stressed the need for further studies to identify precise revised Green Belt boundaries.

Annex 1 contains the assessment for Dacorum. The Wayside Farm site formed the southern part of Strategic Parcel 14B. This part of the strategic parcel was considered to make a significant contribution to the Green Belt purposes.

(ii) Stage 2 Green Belt Review and Landscape Appraisal (ARUP, January 2016)

This study of Dacorum gave a more detailed assessment than stage 1. It highlighted areas which were performing least well against Green Belt purposes and were least sensitive in landscape terms.

The Wayside Farm site was called site KL-A4 and Table 5.2 (page 54) indicated that this site contributed moderately to the Green Belt purposes.

The Landscape Appraisal concluded (page 95) that the overall sensitivity of this landscape was **high** and the report stated that:

“The overall sensitivity of this landscape is judged high by virtue of its considerable visual prominence, openness, level of intervisibility and long views, and the cultural landscape associations of the old Royal Deer Park and the later estate of the Earls of Essex, both tangible and in terms of archaeological potential. It would not be suitable for Green Belt release for the foregoing reasons.”

Following further a re-assessment against the purposes of the Green Belt in the NPPF, it was concluded in Table 5.6 in relation to site KL-A4 that:

“Sub-area would compromise the ability of the wider Green Belt to meet its purposes - exclude from further consideration.”

(iii) Stage 3 Green Belt Review (ARUP, August 2020)

The Stage 3 review assessed potential housing and employment site allocations that lie within the Green Belt. For each site, it advised on where the new Green Belt boundary should be defined if the site is released from the Green Belt and whether the boundary should be strengthened. Table 4.1 in the main report summarised the site by site findings.

The assessment of the Wayside Farm site (site 99), can be found on page 64 in Annex A.

2. Site Assessment Study (AECOM, January 2020)

This study assessed 144 greenfield sites identified by the Council as having potential for residential or employment development. The Wayside Farm site is Site 99 in Volume 3 (Final Site Schedules). The north west part of Site 99, including the land with potential for employment development is referred to as Site 99a. The following points in the study are particularly relevant:

“Economic development potential: Kings Langley contains a good concentration of businesses with a very well-qualified labour force that are in high-level occupations. The Site is located in the south-west of Kings Langley and has access to the station and the M25 Junction 20 which are crucial. The Employment Land Availability Assessment shows that this location, with the ease access to London by train and car in addition to the good-quality housing in the area (attractive to directors), provides the best opportunity for development within the Borough. The Assessment illustrates the area to the south of Kings Langley has attracted occupiers such as EMTEX and Imagination Technologies. Kings Langley is seen as a "place of limited opportunity" for development in the Adopted Core Strategy however; the Local Plan Issues and Options Consultation acknowledge that the area to south-west of Kings Langley providing the optimal opportunity for development in the area with very few constraints as any development on this site can take advantage of strong train links and proximity to the M25.”

Overall site conclusion – comments: Performance of site in terms of how it contributes to Green Belt purposes considered significant constraint, with coalescence, local character and history and flooding as other important constraints. The Green Belt Review does, however, state that the northern part of the parcel (and thus also of the site), i.e. that part closest to Kings Langley, is less constrained. Given that the other constraints (coalescence, local character and flooding) also all apply to a far greater degree on the southern and eastern part of the site than the north, it is considered appropriate to define an amended site 99a for the purposes of this assessment. Site 99a would far more effectively ‘round off’ Kings Langley with respect to its historic character as a free-standing settlement, and help mitigate the perception of coalescence with Abbots Langley/Watford to the south, by keeping development north of Home Park Mill Link Road. It would perform much better in Green Belt, spatial opportunities and constraints, and flood risk terms, though major constraints remain in terms of Green Belt and landscape as 99a remains exposed to views from public rights of way. There would also still be development impacts on the setting of heritage assets towards the northern end of the site (listed buildings, scheduled monuments, conservation area). However, the allocation of 99a could be offset by compensatory improvements to that part of the site not allocated but remaining within the Green Belt and in the same ownership, in line with NPPF paragraph 138.”

Overall site conclusion - final rating: Site 99a only is potentially suitable for development with major constraints. ”

3. Dacorum Employment Land Availability Assessment (PBA, October 2017)

Appendix C contains an assessment of the site on pages 229-231 (site P8). The following recommendations were made:

“Should the site be identified for potential employment use? Yes.

Reasons/comments: The location in terms of public transport and strategic access means that it could find a market for office space in this location. Due to the size of the site, part of the site could be identified for employment use with a safeguard for future employment needs.

Any further advice: It could be suitable for other employment uses; however, given the need for new office space identified, it may be more pragmatic to safeguard the site for office development, at least initially.

In the main body of the report, paragraph 5.33 stated that:

“To meet office demand, DBC should consider allocating further sites. We consider south west Kings Langley is the location with the most potential in market terms to meet this need. Although there is not any significant office space within the Dacorum part of Kings Langley at present, we consider that the market would react positively if further land was made available for development that could take advantage of the strong train links into London and the proximity to the M25.”

Paragraph 5.43 is also relevant:

“To meet office demand, DBC should consider allocating further sites. We consider south west Kings Langley is the location with the most potential in market terms to meet this need. Although there is not any significant office space within the Dacorum part of Kings Langley at present, we consider that the market would react positively if further land was made available for development that could take advantage of the strong train links into London and the proximity to the M25.”

Paragraphs 6-15-6.20 considered how to reach a market balance for offices. Points made included:

- The only option for significant office development in Dacorum is the Kings Langley site. DBC could choose to allocate in the order of 18 ha to deliver the Borough’s shortfall of 107,000 sqm identified in Table 6.2.
- Given the site’s location, it is likely that a significant employment allocation would meet a wider than local need.
- It is also relevant to consider the potential of the key site at East Hemel Hempstead in St Albans District. Any office development there would inevitably meet a wider south west Hertfordshire need.
- The deliverability of the Kings Langley and East Hemel Hempstead sites should also be factored in. The Hemel site is being actively promoted for development and is located in a future enterprise zone. It is likely to come forward in the period to 2036. The Kings Langley site also has potential and should be regarded as a suitable ‘reserve’ site for office development should delivery issues arise at East Hemel Hempstead.

- Relying on a single site leaves little scope for the office stock to Improve.

Paragraph 7.28 recommended that:

“To meet its own needs for office development, we recommend that the Kings Langley site should be considered for allocation – either as a full allocation or a reserve site if discussions with neighbouring authorities indicate that need can be met across borough boundaries. Without this, the borough lacks office capacity that is attractive to the market.”

4. South West Hertfordshire Economic Study Update (Hatch Regeneris, September 2019)

The site is assessed on pages 169-171. The following conclusion was drawn:

“Access to a strong labour market, existing office park and the Orbital motorway are locational benefits. The site can accommodate demand for higher value commercial offices albeit it is well placed for a range of strategic industrial uses subject to access. However, it appears that large-scale development is not possible unless a major improvement to M25 Junction 20 is carried out.”

In the main body of the report, Table 8.11 provided a summary of the conclusions from the site reviews in Appendix D, including the following on wayside Farm:

Area with development potential (ha.)	Potential uses	Comments
42.3	B1a/c, B2, B8	Green Belt site which benefits from access to Kings Langley train station, proximity to existing office park and the Orbital motorway. The site is well placed to accommodate demand for higher value commercial offices and a range of strategic industrial uses. However large scale major development is not possible unless a major improvement to M25 Junction 20 is carried out.

5. Draft ‘Schedule of Site Appraisals (for Large Greenfield Sites) (DBC, November 2017)

The Local Plan Issues and Options consultation document was accompanied by the draft ‘Schedule of Site Appraisals (for Large Greenfield Sites)’. This was the Council’s initial assessment of sites which were currently in the Green Belt or Rural Area and had been put forward by developers and landowners for either housing and/or employment use. Wayside Farm was referred to as site KL-h3 and assessed on pages 123-127 as a potential site for residential, employment or mixed use development.

Liaison with landowners

Owners: Hertfordshire County Council

Landowner meetings

A meeting between the Council and Hertfordshire County Council took place on 5 April 2017. One of the issues explored at the meeting was:

“The site’s strategic potential to provide for future employment land in the Borough and the wider South West Herts area (c.8ha of offices and possibly also land for mixed B1/B2/B8 uses) if the recommendations of the employment study are taken forward.”

County Council’s response to Issues and Options consultation (2017)

Hertfordshire County Council’s response to the Borough Council’s Local Plan Issues and Options consultation document can be seen earlier in the assessment of the Wayside Farm site under ‘Dacorum Local Plan Issues and Options Consultation’ above. In summary, if the highways capacity and congestion issues can be resolved, the site could help meet employment needs earlier than the 2036 date in the Issues and Options consultation.

Estimated potential employment floorspace

There is potential for a large employment development on the site. The Dacorum Employment Land Availability Assessment stated that an office allocation of 18 ha. would deliver around 107,000 sq. metres of office floorspace. However, based on the plot ratio for offices of 0.8 recommended in the South West Hertfordshire Economic Study Update, it would require only about 13.4 ha. to accommodate this quantum of offices.

The evidence base indicates that the site also has potential for industrial development. However, as stated in the Land Availability Assessment, given the need for new office space identified, it may be more pragmatic to safeguard the site for office development, at least initially.

New Local Plan: conclusion

The site is well located for employment development and is the only option for large scale office development within Dacorum. It could accommodate all of the Borough’s shortfall in office space over the Plan period.

However, the Local Plan Emerging Strategy for Growth consultation document does not propose office or any other employment development on the site, for the following main reasons:

- The Stage 2 Green Belt Review and Landscape Appraisal concluded that the overall sensitivity of the site's landscape is high and that development on the site would compromise the ability of the wider Green Belt to meet its purposes.
- Proposals for office development on the site might jeopardise the success of the proposed East Hemel Hempstead employment site within the Herts IQ Enterprise Zone.
- Although the South West Hertfordshire Growth and Transport Plan identified a need to improve M25 Junction 20, there are no firm proposals to improve this junction or a likely timescale for any such works.
- The South West Hertfordshire Economic Study Update (2019) concluded that the future need for additional office space in Dacorum is considerably lower than stated in the original Economic Study (2016). This means that the case for office development at Wayside Farm is weaker than appeared to be the case in 2017, when the Dacorum Employment Land Availability Assessment was produced. The long-term implications of Covid-19 may further reduce the need for office space.

Bourne End Mills extension

Site location

The site consists of two areas:

- Area 1: land between Bourne End Mills and Stoney Lane (0.4 ha.)
- Area 2: land adjacent to A41 service area, Stoney Lane (1,1 ha.)

Existing land use

Unused land.

Planning policy context and planning history

Dacorum Borough Local Plan 1991-2011 (2004)

The whole site is located in the Green Belt.

Area 1: Policies 5 (major developed sites in the Green Belt) and 32 (employment areas in the Green Belt), which applied to this site, have been superseded by the Site Allocations (see below).

Area 2: Most of the site was covered by proposal T15 in the Schedule of Transport Proposal Sites and Schemes – an extension to the Bourne End Service Area was proposed. This proposal was not carried forward into the Site Allocations, so no longer applies.

Dacorum Core Strategy (2013)

Policy CS5 (Green Belt) is particularly relevant.

Dacorum Site Allocations (2017)

Area 1: two policies are relevant:

- Policy SA2 (major developed sites in the Green Belt). Bourne End Mills is shown in the schedule below the policy as major developed site MDS/8. The policy states that areas of infill, where any new development will be concentrated, are shown in Appendix 3. The plan of MDS/8 in Appendix 3 shows that Area 1 is not within the infill area.
- Policy SA6 (employment areas in the Green Belt). Bourne End Mills is classified as an employment area in the Green Belt. From the map on page 57 of the Site Allocations Map Book, it can be seen that Area 1 (but not Area 2) is within the defined employment area. The policy states that proposed uses in this employment area are B1, B2 and B8.

Dacorum Local Plan Issues and Options Consultation (2017)

The consultation document did not refer to Bourne End Mills or any potential extension to it.

Planning history

No relevant planning history.

Evidence base studies

1. Green Belt Review

The Green Belt review has been considering possible changes to the existing Green Belt boundaries. The review is not relevant to the Bourne End Mills area, as it is washed over by the Green Belt.

2. Site Assessment Study (AECOM, January 2020)

Possible extensions to the Bourne End Mills employment area were not looked at in this study.

3. Dacorum Employment Land Availability Assessment (PBA, October 2017)

Possible extensions to the Bourne End Mills employment area were not looked at in this assessment.

4. South West Hertfordshire Economic Study Update (Hatch Regeneris, September 2019)

Area 2 was assessed in Appendix D of the study, but not Area 1. The assessment of Area 2 can be found on pages 163 and 164. Paragraph D.35 advised that:

“The proximity to the successful Bourne End Mills Industrial Estate supports the potential development of the site for industrial activity. However the topography, size of site and proximity to commercial and leisure activity is expected to restrict the developable area. The site would be suited to a modest scale light industrial development. There is limited potential for further B1a / A class uses given commercial demand on the A41 corridor is low and the market generally prefers locations with proximity to retail amenity and public transport options. The characteristics of the site do not necessarily meet the requirements of the office market and any development would often seek a pre-commitment. In light of this, the proportion of commercial development would likely be low and the site presents an opportunity to meet demand from B1c and B2 uses to support the local industrial services needs and of the surrounding residential population.

The following conclusion was drawn:

“The site is located on the A41 which is well connected to surrounding local markets. The neighbouring site and local employment activities provides facilities to support future operations of the site. The size and topography of the site may limit the type of employment that is attracted to the site. The site is expected to support small scale industrial needs of the local market and possible further commercial development.”

In the main body of the report, Table 8.11 provided a summary of the conclusions from the site reviews in Appendix D, including the following on Area 2:

Area with development potential (ha.)	Potential uses	Comments
1.1	B1a/c, B2	Size and topography of the site may limit type of employment that is attracted to the site but could support small scale light industrial uses serving a local market.

5. Draft 'Schedule of Site Appraisals (for Large Greenfield Sites) (DBC, November 2017)

The Local Plan Issues and Options consultation document was accompanied by the draft 'Schedule of Site Appraisals (for Large Greenfield Sites)'. This was the Council's initial assessment of sites which were currently in the Green Belt or Rural Area and had been put forward by developers and landowners for either housing and/or employment use. However, possible extensions to Bourne End Mills were not appraised.

Liaison with landowners

Area 1: there has been no liaison with the landowner.

Area 2:

Owner: Mr J Kansal, except for a small triangle of land in the east of the site next to Upper Bourne End Lane.

There have been no landowner meetings, but there has been contact during 2020 between The Architects Co. (on behalf of the landowner) and the Council by phone and email. The information provided by The Architects Co. is summarised below:

- The proposed use for the site is Use Classes B1(c), B2 and B8. The sizes of the units will be within the small category as specified on Page 34 section 4.56 of 'The Dacorum Employment Land Availability Assessment October 2017' document. A sketch layout of the proposed units has been produced.
- Market testing was carried out pre-Covid-19. At the time there was a healthy demand for small units.. No one will know for a while the impact Covid-19 is going to have on the economy. However, it will be a while by the time any scheme goes through the planning process and gets built. We hope that by then the economy has recovered and there will be healthy demand for such units.
- No investigations have been carried out to ascertain the ground conditions/ pollution on this site. This will be carried out as part of Planning Application submission.

- There is an access road at present from the service road to the filling station and adjacent hotel as shown. Further discussions will be carried out with Hertfordshire Highways to ascertain the possibility of a direct access to the site from the roundabout adjacent to the site.
- There are remnants of a balancing tank/pool on site. It appears that this has never been used as it has overgrown shrubbery on it and nobody has ever approached our client for access to maintain it.

Estimated potential employment floorspace

Assuming a plot ratio of 0.4 for industrial development, as recommended in the South West Hertfordshire Economic Study Update, the site could accommodate around:

Area 1: 1,600 sq. metres of industrial space.

Area 2: 4,400 sq. metres of industrial space.

New Local Plan: conclusion

The site is well located for employment development. The market is expected to favour small and medium sized industrial units, rather than offices.

Development on the site would have a limited impact on the openness of the Green Belt, as it is in a location already dominated by uses of an urban nature. The site is sandwiched between the large existing Bourne End Mills employment area to the north and the A41 service area and A41 dual carriageway road to the south and west.

Area 1 is a small site with little development potential and is not being promoted for development by the landowner. Also, a considerable part of the site is in an area with a high risk of surface water flooding.

In contrast, the main landowner of Area 2 supports an allocation for industrial development. Area 2 could accommodate around 4,400 sq. metres of industrial floorspace.

Therefore, in the Local Plan Emerging Strategy for Growth consultation document:

- The whole site and also the A41 service area is included in an expanded Bourne End Mills employment area (see Policy DM16 and the draft Proposals Map).

- Area 2 is shown as a 'growth area' for employment development (Site Cy01), to provide accommodation for small and medium sized firms.

Bovingdon Brickworks extension

Site location

Site area: 0.7 ha.

Existing land use

Unused land, but mostly covered in hardstanding. The land was previously used by in connection with the manufacture of bricks, which has now ceased.

Planning policy context and planning history

Dacorum Borough Local Plan 1991-2011 (2004)

Bovingdon Brickworks and the surrounding land were located in the Green Belt.

Policies 5 (major developed sites in the Green Belt) and 32 (employment areas in the Green Belt), which applied to Bovingdon Brickworks, have been superseded by the Site Allocations (see below).

Dacorum Core Strategy (2013)

Policy CS5 (Green Belt) is particularly relevant.

Dacorum Site Allocations (2017)

Two policies are relevant:

- Policy SA2 (major developed sites in the Green Belt). Bovingdon Brickworks is shown in the schedule below the policy as major developed site MDS/5. The policy states that areas of infill, where any new development will be concentrated, are shown in Appendix 3. This appendix shows only one boundary for MDS/5 i.e. the whole of the defined area is suitable for infilling. However, the possible extension to the Bovingdon Brickworks employment area is not within the defined area.

- Policy SA6 (employment areas in the Green Belt). Bovingdon Brickworks is classified as an employment area in the Green Belt. The policy states that proposed uses in this employment area are B1, B2 and B8. The boundary of the employment area is shown on page 57 of the Site Allocations Map Book.

Dacorum Local Plan Issues and Options Consultation (2017)

The consultation document did not refer to Bovingdon Brickworks or any potential extension to it.

Planning history

In 2020, Hertfordshire County Council issued a certificate of lawful existing use of development (CLEUD) in respect of the storage of bricks on land to the south east of the defined employment area in the Green Belt.

1. Green Belt Review

The Green Belt review has been considering possible changes to the existing Green Belt boundaries. The review is not relevant to the Bovingdon Brickworks area, as it is washed over by the Green Belt.

2. Site Assessment Study (AECOM, January 2020)

Possible extensions to the Bovingdon Brickworks employment area were not looked at in this study.

3. Dacorum Employment Land Availability Assessment (PBA, October 2017)

Possible extensions to the Bovingdon Brickworks employment area were not looked at in this assessment.

4. South West Hertfordshire Economic Study Update (Hatch Regeneris, September 2019)

The site is assessed on pages 161-163. Paragraph D.28 advised that:

“The landowners are promoting redevelopment of 1.9 hectares in the centre of the site, including some land outside the defined employment area in the Green Belt, where brick production occurred. The proposal involves the replacement of the existing buildings with a footprint of around 4,900 square metres, with a mixed scheme (B1, B2, B8) of 7,000 to 8,000 square metres. Although the site is relatively isolated from the network, and unlikely to attract distribution operators, there is expected to be demand from local occupiers that complement adjacent existing uses. Notwithstanding the closure of Bovingdon Bricks the site continues to host a number of other operators with ongoing activity, local requirements and supporting local employment. The site therefore continues to

provide a local employment function. The nature of the location means the site is suited to local employment activities that can operate with direct residential adjacency constraints.”

The following conclusion was drawn:

“The site is an established employment site serving the market needs of local industrial uses. The site is detached from the strategic road network. It is suitable that the site continues its current function and could support additional small-scale industrial development.”

In the main body of the report, Table 8.11 provided a summary of the conclusions from the site reviews in Appendix D, including the following on Bovingdon Brickworks:

Area with development potential (ha.)	Potential uses	Comments
0.7	B1c, B2, B8	Existing employment site with proposals to redevelop existing uses with a mixed scheme. Expected to attract demand from local businesses for light industrial uses that complement existing uses.

5. Draft ‘Schedule of Site Appraisals (for Large Greenfield Sites) (DBC, November 2017)

The Local Plan Issues and Options consultation document was accompanied by the draft ‘Schedule of Site Appraisals (for Large Greenfield Sites)’. This was the Council’s initial assessment of sites which were currently in the Green Belt or Rural Area and had been put forward by developers and landowners for either housing and/or employment use. However, possible extensions to Bovingdon Brickworks were not appraised.

Liaison with landowners

Owners: EH Smith (who used to make bricks at Bovingdon Brickworks and still use part of the brickworks site to run their EH Smith Builders Merchants business)

There were no landowner meetings before the Local Plan Issues and Options consultation in 2017. Since then, the Council has liaised closely with EH Smith and their planning consultant, Brasier Freeth. This has included meetings and a site visit. Also, EH Smith’s consultants have produced technical reports as stated below:

- Landscape appraisal (The Landscape Partnership)
- Measured building survey of buildings formerly used for brick-making (Survey Solutions)

- Traffic impact assessments (RGP)
- Sketch layouts showing potential new industrial development (The Landscape Partnership and LHA Architects)
- Viability reports (Goring Berry Quantity Surveyors)

Key points to note are as follows:

- The buildings formerly used for brick-making have a floorspace of around 4,500 sq. metres.
- The sketch layout produced by The Landscape Partnership and the initial layout from LHA showed 8,000 sq. metres of new industrial development, partly within the existing defined employment area in the Green Belt and partly outside it. The buildings formerly used for brick-making would be demolished, so the net increase in industrial floorspace would be about 3,500 sq. metres although it should be noted that the existing buildings are quite bulky. Landscaping would be provided to screen the new development from the open countryside.
- An initial viability report indicated that an 8,000 sq. metres scheme would have marginal viability. Therefore, a revised report was produced to test the viability of a 10,000 sq. metres scheme. This showed that this quantity of development would be viable.
- In the light of the viability work, LHA produced revised sketch layouts, showing how 10,000 sq. metres of industrial floorspace could be accommodated. The scheme involved extending the development site further to the east, onto part of the area currently used for brick storage.
- The initial traffic impact assessment looked at an 8,000 sq. metres scheme and the revised assessment was based on a 10,000 sq. metres scheme. For the larger scheme, the assessment found that the proposed development is likely to generate more traffic than the previous brickworks use. However, peak hour flows would probably be lower and HGV movements similar. It was concluded that the proposed development represented a reasonable level of development on the site and that there was an opportunity to introduce sustainable travel incentives to the site. Hertfordshire County Council as highway authority, has not yet responded to the assessments.

The proposed development would have an impact on the openness of the Green Belt, so it is necessary to consider how this could be mitigated. Also, the proposed development involves land either side of a public footpath and would adjoin publicly accessible land owned by the Box Moor Trust. Consequently the Council (planning, rights of way and trees and woodlands officers), the Box Moor Trust, EH Smith and Brasier Freeth have met on the site to discuss a possible way forward. A conclusion has not yet been reached, but measures could include footpath diversion and improvement, and additional landscaping.

Estimated potential employment floorspace

Sketch schemes on behalf of the landowner propose either 8,000 or 10,000 sq. metres of industrial floorspace. The former brick-making buildings would be demolished, giving a net increase in floorspace of around 3,500 or 5,500 sq. metres.

New Local Plan: conclusion

The site represents a small extension to a well-established employment area and an employment allocation is supported by the landowner. The market is expected to favour small and medium sized industrial units, rather than offices.

Development on the site would have a limited impact on the openness of the Green Belt, as it is in a location already dominated by industrial buildings and the net increase in floorspace would be modest.

Area 1 is a small site with little development potential and is not being promoted for development by the landowner. In contrast, the main landowner of Area 2 supports an allocation for industrial development. Area 2 could accommodate around 4,400 sq. metres of industrial floorspace.

Therefore, in the Local Plan Emerging Strategy for Growth consultation document proposes:

- To expand the Bovingdon Brickworks employment area by 0.7 hectares to include all of the land proposed for industrial development by The Landscape Partnership in their sketch scheme (see Policy DM16 and the draft Proposals Map).
- To define the land proposed for industrial development in The Landscape Partnership's sketch scheme as a 'growth area' for employment development (Site Cy02), to provide accommodation for small and medium sized firms.

Before the Local Plan publication stage, the Council will reach a conclusion on whether the proposed industrial floorspace should be increased, as requested by the landowners. The Council's decision on this issue will take account of what way forward can be agreed in terms of mitigating the impact on the Green Belt and the enhancement of the footpath network.

New Ground Farm, Newground Road, Aldbury

This site was assessed in the Dacorum Employment Land Availability Assessment (Appendix C, pages 229-231, site ref. P7). However, it has since been redeveloped for housing, so the site is no longer available for employment development.