



Dacorum Borough Council

Local Planning Framework

DACORUM CORE STRATEGY EXAMINATION IN PUBLIC

Statement by Dacorum Borough Council

Issue 10: Hemel Hempstead

September 2012

Purpose of this statement

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

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

Matters raised by Inspector

- 10.1 Is the policy for growth and change in this area appropriate and justified, including in relation to national guidance and local needs, and in terms of economic, social and environmental impact? Can local infrastructure satisfactorily accommodate the proposed growth? Have all reasonable alternative sites been assessed? Has the transport infrastructure required to support the proposed growth been properly assessed and can it be satisfactorily provided?
- 10.2 What are the implications for Hemel Hempstead with regard to development on land to the east within St Albans City and District? Is the proposed boundary of the East Hemel Hempstead AAP appropriate and justified? Have all the opportunities for development to the east of Hemel Hempstead been robustly explored?
- 10.3 Are the local allocations (particularly LA1 and LA2) justified and are the principles for their development sound?
- 10.4 What public consultation has been undertaken with regard to LA2? Have the requirements of the Council's Statement of Community Involvement been met?
- 10.5 Is the boundary of the Hemel Hempstead Town Centre appropriate and justified?
- 10.6 Are the requirements for the Maylands Business Park (CS34) justified and consistent with the advice in Figure 18?
- 10.7 Are the opportunities in The Gade Zone (Figure 17 on page 169) clear and do they incorporate sufficient flexibility?
- 10.8 What is the Council's approach to development at Apsley (in particular Apsley Mills retail park). Is it appropriately reflected in the Core Strategy?

Dacorum Borough Council's Response

10.1 Is the policy for growth and change in this area appropriate and justified, including in relation to national guidance and local needs, and in terms of economic, social and environmental impact? Can local infrastructure satisfactorily accommodate the proposed growth? Have all reasonable alternative sites been assessed? Has the transport infrastructure required to support the proposed growth been properly assessed and can it be satisfactorily provided?

10.1.1 In order to ensure preparation of a distinctive planning framework that reflects the needs and priorities of different communities, the Council has prepared an overarching Core Strategy with spatially distinctive strategies for each place within the borough. This includes Hemel Hempstead.

National guidance

10.1.2 Achieving sustainable development is the Government's stated purpose for the planning system (paragraph 6 in the National Planning Policy Framework: it is elaborated in sections 1-13 of the NPPF).

10.1.3 There are three aspects to sustainable development – i.e. an economic role, a social role and an environmental role. These roles are interlinked and should not be taken in isolation (NPPF paragraphs 7 and 8). Economic, social and environmental gains should be sought jointly (NPPF paragraph 8).

10.1.4 Paragraph 9 (NPPF) summarises what pursuing sustainable development involves: i.e.

“...seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including (but not limited to):

- *making it easier for jobs to be created in cities, towns and villages;*
- *moving from a net loss of biodiversity to achieving net gains for nature;*
- *replacing poor design with better design;*
- *improving the conditions in which people live, work, travel and take leisure;*
and
- *widening the choice of high quality homes.”*

10.1.5 Plans (and decisions) need to:

“... take local circumstances into account, so that they respond to the different

opportunities for achieving sustainable development in different areas.” (Para 10 NPPF). Furthermore, “Local plans are the key to delivering sustainable development that reflects the visions and aspirations of local communities.” (paragarph 150 NPPF)

10.1.6 The Council concludes that:

- a) the purpose of the Core Strategy and place strategies is to ensure that new development is sustainable;
- b) the Core Strategy should guide development to sustainable locations;
- c) development should support the achievement of the objectives and factors listed above;
- d) the appropriate balance between these factors may vary from place to place, due to their particular characteristics and their current and intended role within the Borough; and
- e) due consideration should be given to local community aspirations.

10.1.7 These principles underpin and are articulated in the Pre-Submission Core Strategy. The Council has looked at the role of each place within this context and outlined what it considers to be the most appropriate strategy.

10.1.8 The settlement hierarchy for the borough and descriptions in Table 1 is based on the function and character of each place. It also reflects the potential scale of change which each settlement (and the countryside) can reasonably absorb without undue detriment (see 2.1 in Issue Paper 2: The Distribution of Development (Settlement Hierarchy) and the Green Belt).

10.1.9 Table 1 (Settlement Hierarchy) on page 54 of the Pre-Submission Core Strategy identifies Hemel Hempstead as the main centre for development and change in the Borough, where development will be concentrated. The table states that the town will provide sufficient housing to meet the natural growth of its population and will also accommodate substantial employment growth. Policy CS1: Distribution of Development indicates that Hemel Hempstead will be the principal focus for homes, jobs and strategic services. The guidance in the policy concerning Hemel Hempstead is designed to ensure that the economic, social and environmental impact of future development is acceptable. See the Council’s response to Issue 2 for further information.

10.1.10 The broad approach to development set out within the Dacorum Borough Local Plan 1991-2011 (Examination Document OT1) remains appropriate. However, the Core Strategy now gives greater emphasis to regenerating the town centre and the Maylands Business Park. Limited Green Belt releases are also considered necessary to help meet housing needs.

10.1.11 The proposal in the Pre-Submission Core Strategy to concentrate development in Hemel Hempstead reflects the East of England Plan (Examination Document REG7), taking account of the outcome of the legal challenge (Examination

Document REG17). Policy SS3 in the East of England Plan states that new development should be concentrated at the key centres for development and change, including Hemel Hempstead. The text following this policy explains that concentrating development at these locations will make the most of existing infrastructure and the potential for improvements or extensions to it. Policy LA2 provides more detailed guidance on Hemel Hempstead key centre for development and change.

Local Considerations

10.1.12 The Borough's needs and those of places within it have been considered through the creation of a substantial evidence base. This comprises technical studies, the results of public consultation and testing through the sustainability appraisal process: among other things they address the matters listed in paragraph 9 in the NPPF (see paragraph 10.1.4 above).

Technical studies

10.1.13 Technical studies form an important part of the Council's evidence base. They look at the Borough both as a whole, and specific places within it. For all technical work carried out until July 2009 (Guide to the Evidence Base: Examination Document OT4), the conclusions were broken down into key place-based recommendations to assist the formulation of the individual Place Strategies.

10.1.14 The approach to homes and jobs within Hemel Hempstead has been informed by:

- Housing assessments (e.g. Examination Documents HG12, 13 and 14)
- Employment space studies (e.g. Examination Documents ED8, 11 and 12)
- Retail studies (e.g. Examination Documents ED6 and 13).
- Work associated with the town centre and Maylands masterplans (e.g. Examination Documents MP1 and ED4 and 5).

10.1.15 For Hemel Hempstead, key recommendations are as follows:

Employment - The Maylands Business Park will remain the main employment area for the borough and major new employment development should take place in the Maylands Gateway. There should be a more flexible approach regarding the type of B-class development at Maylands. Some further office development should take place in the town centre. The Apsley/Two Waters area also contains important employment sites, most of which should be retained.

Retail – The latest retail assessment suggests that allowance should be made for an additional 47,500 square metres (net) of comparison floorspace and 6,000 of convenience. A new superstore in the town centre is recommended. However, the recommendation for comparison shopping is that no specific allocations for the identified need should be made in the short to medium term,

given current vacancies and the trading performance of existing stores.

Housing – The starting point has been to regard Hemel Hempstead as the main focus for future housing development, whilst retaining the broad extent of the Green Belt and the town's attractive setting in the Gade and Bulbourne valleys. Local objectives for housing have been set to reflect these conclusions, indicating an expected delivery of around 8,800 new homes between 2006 and 2031 (77% of the Borough's total predicted housing supply). The need for the outward expansion of town has been considered and realistic options for this expansion weighed up through consultation on Site Allocations Development Plan Document (DPD) (Examination Document SA1), and Assessment of Potential Local Allocations and Strategic Sites (Examination Document HG15), Assessment of Alternative Growth Scenarios at Hemel Hempstead (Examination Document HG10) and through the Sustainability Appraisal work (Examination Document SUB3) – see response to question 10.3 below).

Policy CS19: Affordable Housing sets a higher threshold for on-site delivery of affordable homes in Hemel Hempstead than elsewhere in the borough to reflect local conditions (see response to Issue 7.2).

Environmental – Key documents include the Urban Nature Conservation Study (Examination Document EN3), the Urban Design Assessment (incorporating updates) (Examination Document BP5), the Open Space Study (Examination Document EN6) and the Green Space Strategy and Green Infrastructure work (Examination Documents EN12 and 13). Advice has also been received from experts, including English Heritage, the Council's ecological adviser from the Hertfordshire Biological Records Centre and the County Archaeologist. This advice has helped identify the urban structure of the town articulated on the Hemel Hempstead Vision Diagrams (Figures 19 and 20) and reflected in the Place Strategy. This structure includes urban and strategic wildlife corridors, open land, green gateways and urban design zones. This includes the Gade and Bulbourne River corridors, extensive open land and Green Gateways marked by Boxmoor / Heath Park and Gadebridge Park.

Infrastructure – Through technical work (especially the Infrastructure Delivery Plan and its Update: Examination Documents ID3 and 5) and consultation, relevant thresholds for new infrastructure and the capacity of existing infrastructure, including schools (especially primary schools), road network, leisure and community uses and utilities infrastructure have been considered. Consideration has also been given as to whether there should be any 'jumps' in thresholds e.g. what infrastructure is needed to accommodate different scales of development. In particular, primary school planning has been a useful check on the scale of new development. Transport infrastructure is considered in paragraphs 10.1.22-10.1.24 below.

- 10.1.16 The technical work shows that there are no absolute constraints to the delivery of the development proposed by the Pre-Submission Core Strategy in Hemel Hempstead. There are some infrastructure deficits, but the main focus needs to be given to meeting new demands created upon the Borough's infrastructure by the planned level of new development.

10.1.17 Policies CS33: Hemel Hempstead town centre and CS34: Maylands Business Park and the proposals for the local allocations in Hemel Hempstead include some measures for improved infrastructure. However, as stated in sections 20 and 28 of the Pre-Submission Core Strategy, detailed site specific planning requirements and guidance on infrastructure requirements will be provided through the Site Allocations DPD and the East Hemel Hempstead Area Action Plan (AAP).

10.1.18 Hertfordshire County Council forecasts that the level of development proposed (i.e. the 8,800 local housing figure) will generate a need to provide up to 14 new forms of entry at primary school level (see Table 3.3 on page 26 of the Infrastructure Development Plan Update: Examination Document ID6). Table 3.3 gives a broad indication of where 10 of these forms of entry will be located. With regard to secondary schools, it is expected that the extra demand for places can be absorbed through capacity at existing schools, although some expansion may be required (see Table 3.5 on page 31 of ID6).

10.1.19 The recommendations of all this technical work have been taken into account when developing the Hemel Hempstead Place Strategy – both in the formulation of the vision, the setting of local objectives and the approach to growth and change

Consultation

10.1.20 During the preparation of the Core Strategy, the role of consultation for Hemel Hempstead was slightly different from that for the other Place Strategies. This is due to complications regarding the content of the Regional Strategy (RS) (Examination Document REG7). It included:

- The town's role without major expansion in the Regional Strategy (RS), via initial Issues and Options consultation [NB general consideration of higher growth level (housing target)]
- Its role with major expansion and the implications of this (through the identification and consideration of what became known as the 'Blue Blobs' i.e. opportunities for the outward growth of the town, primarily in the form of new neighbourhoods or extensions to existing New Town neighbourhoods.)
- Emerging Core Strategy – without significant growth due to uncertainty regarding the RS.
- Consultation Draft Core Strategy – alternatives with and without outward growth.

10.1.21 Consultation has been carried out with residents and stakeholders. A full summary of the consultation processes, the results received and how this

consultation has resulted in changes to the Core Strategy (up to the stage of Pre-Submission) is set out in the Report of Consultation (Examination Document SUB6). Key elements have been:

(a) *Supplementary Issues and Options – Growth at Hemel Hempstead* (see Volume 2 of the Report of Consultation – Examination Document SUB6)

10.1.22 The original Issues and Options consultation on the Core Strategy (Volume 1 of the Report of Consultation) was based on a draft East of England Plan figure of 7,100 dwellings. However, the Panel Report that followed the Examination in Public into this Regional Strategy (RS) recommended a fundamental change in approach. It suggested the designation of Hemel Hempstead as a 'Key Centre for Development and Change' and a significantly increased housing target (12,000 new homes between 2001-2021), some of which could be delivered within St Albans City and District. This would require significant Green Belt releases.

10.1.23 St Albans and Dacorum Councils undertook a joint consultation to help:

- Understand where community preferences lay;
- Determine the Councils' formal response to the Proposed Changes to the East of England Plan; and, if these changes were adopted
- Implement the final Regional Strategy.

10.1.24 Feedback was sought on a series of growth options, which became known as 'blue blobs' due to the way they were depicted on the accompanying maps. The blue blobs comprised either new neighbourhoods or extensions to existing neighbourhoods. Feedback was also sought on options for the distribution of employment growth and on a set of suggested planning principles that would underpin the future strategy for the town.

10.1.25 Whilst support for the planning principles was high, there was strong opposition to the level of growth proposed by the Panel, and to all locational options put forward.

(b) *Place Workshops* (see Volume 3 of Report of Consultation – Examination Document SUB6).

10.1.27 The Hemel Hempstead Place Workshop was one of a series of interactive workshops to help inform issues, actions and policy direction. The workshops were attended by Officers, elected representatives, residents and other key stakeholders. The issues raised at the workshop were varied and included the need to:

- improve public transport provision between key areas (town centre, Maylands, train station and local centres);

- strengthen the connections between existing and new green spaces; and
- deliver more affordable housing for all of the different community groups.

(c) *Emerging Core Strategy* (see Volume 4 of Report of Consultation)

10.1.28 The Emerging Core Strategy (Examination Document CS8) contained draft settlement strategies for each place, with background context. In CS8, the proposals for Hemel Hempstead were broadly similar to those now included in the Core Strategy. However, CS8 did not include local allocations LA1-LA3, due to the relatively low housing target for the borough (360 dwellings a year) proposed in the document. Hemel Hempstead was classified as a key centre for development and change and hence the location in the borough where development should be concentrated.

10.1.29 The public response to the Emerging Core Strategy showed high support for the main proposals:

- 68% supported the approach to the distribution of development, with its focus on Hemel Hempstead.
- 91% supported the approach on employment provision and the focus on Hemel Hempstead, particularly with growth at Maylands, was generally favoured.
- Most people supported the town vision and strategy for Hemel Hempstead and also the town centre vision and policy approach put forward.

(d) *Consultation Draft* (see Volume 6 of the Report of Consultation)

10.1.30 In this version of the plan, feedback was sought on the proposed Hemel Hempstead Place Strategy. In particular, the role of this consultation was to:

- test out different growth scenarios;
- test alternative locations for outward growth; and
- highlight any specific issues that had become apparent for that settlement and what alternative options were for tackling these issues

10.1.31 The Consultation Draft included two options for housing development in the borough. Option 1 proposed 370 homes a year 2006-2031. This option reflected urban capacity. Option 2 proposed 430 homes a year and included local allocations i.e. modest extensions to existing settlements. The local allocations proposed at Hemel Hempstead under Option 2 were LA1-LA3, as now included in the Core Strategy, except that the proposals for West Hemel Hempstead were for between 450 (northern area only) and 900 homes.

10.1.32 The response to the Consultation Draft showed no clear consensus. For example, the many amenity groups and the general public felt the proposed housing targets were too high and the local allocations would harm the Green Belt. In contrast, developer interests regarded the proposed level of housing as

too low to meet local needs.

(e) Citizen's Panel

- 10.1.33 Views from residents were separately sought through the Council's Citizens Panel. This helped to ensure that the views and aspirations of a representative range of people from all parts of the borough were considered.
- 10.1.34 This consultation resulted in a high level of support for the general approach to Hemel Hempstead, although the issue of outward growth remained controversial in all locations.

Sustainability Appraisal

10.1.35 Sustainability Appraisal (incorporating Strategic Environmental Assessment) has considered the issue of the distribution of growth (see response to Issue 2). It also considered each individual place strategy against a series of sustainability criteria (which were agreed following consultation with key bodies). In the Sustainability Appraisal Report (Examination Document SUB3), the findings on Hemel Hempstead are summarised in section 6.7.1 and the full assessment is in Appendix F. Key conclusions are as follows:

- The level of proposed housing and employment development in the town is forecast to have some negative adverse effects, for example, for biodiversity, landscape and townscape as a result of loss of Green Belt.
- Positive effects have been forecast across the majority of the social and economic objectives.
- Policy CS33 (Hemel Hempstead Town Centre) is forecast to have positive effects on the majority of the objectives.
- Policy CS34 (Maylands Business Park) is forecast as likely to have a positive effect on many of the objectives.
- Local Allocations: housing development would have a number of positive and adverse effects, but no very adverse effects (see paragraphs 10.3.4, 10.3.9 and 10.3.17 below for further information on what SUB3 says about Local Allocations LA1-LA3).

10.1.36 In 2008, a Habitats Regulation Assessment (HRA), under the UK's Habitat Regulations, of Dacorum's Core Strategy Issues and Options was undertaken (Examination Document CS7). Consultation with Natural England confirmed that only one Natura 2000 site was relevant to the screening process for the Dacorum Core Strategy, namely, the Chiltern Beechwoods Special Area of Conservation (SAC). The HRA therefore related only to the possible effects on the SAC.

10.1.37 An updated HRA of the Pre-Submission Core Strategy was produced in 2011 (Examination Document SUB4). This document noted that the scale of

development proposed was now lower than that under consideration in 2008. The report found no significant effects on the SAC from individual proposed developments as a result of either air pollution or recreation disturbance. Consideration was also given as to possible cumulative significant effects from development in the Borough and beyond. SUB4 concluded that no such problems were envisaged, as long as suitable alternative natural green spaces (SANGs) are provided to divert some of the recreational use of the SAC to other areas.

Have all reasonable alternative sites been assessed?

10.1.38 The Council has carried out a detailed assessment of alternative sites in and around Hemel Hempstead during the preparation of the Core Strategy. This process has considered all the reasonable sites. Key documents produced as part of this process include the following Examination Documents:

CS5	Supplementary Issues and Growth Locations for Hemel Hempstead (Dacorum and St Albans Councils)
HG10	Assessment of Alternative Growth Locations for Hemel Hempstead
HG15	Assessment of Potential Land Allocations and Strategic Sites

10.1.39 In 2005, the Panel Report on the Draft East of England Plan recommended various modifications to the draft plan, including proposals for major development at Hemel Hempstead. Consequently, Dacorum and St Albans Councils jointly issued Examination Document CS5 the following year. This document consulted on what became known as the 'Blue Blobs'. These were opportunities for the outward growth of Hemel Hempstead, primarily in the form of new neighbourhoods or extensions to existing New town neighbourhoods.

10.1.40 At the same time as CS5 was issued, the Council consulted on the Site Allocations DPD – Issues and Options Paper (Examination Document SA1 and see also SA2). The Site Allocations document will include proposals for smaller sites, as well as more detailed guidance on the local allocations set out in the Pre-Submission Core Strategy.

10.1.41 The East of England Plan (Examination Document REG7) was approved in 2008. The approved plan proposed 17,000 additional homes in Dacorum 2006-2031, including a major expansion of Hemel Hempstead and a strategic Green Belt boundary review (see Policies H1 and LA2). Therefore, Dacorum and St Albans Councils continued joint work on the options for growth around the town.

10.1.42 The Assessment of Alternative Growth Scenarios for Hemel Hempstead (Examination Document HG10) was prepared jointly by St Albans and Dacorum Councils. It sought to take forward the requirements of the East of England Plan and assessed three distributional options for delivering new housing through urban extensions. This included an eastern growth option, a northern growth option and a dispersed growth option for the town. Although this consultation document was subject to sustainability appraisal, it was never published for consultation due to the successful High Court Challenge.

10.1.43 The High Court quashed parts of the East of England Plan in 2009 (Examination Document REG17), following a successful challenge brought by Hertfordshire County Council and St Albans District Council. Aspects of the plan that were quashed included the proposals for major expansion at Hemel Hempstead and Welwyn Garden City/Hatfield. The Court held that the sustainability appraisal that justified these major expansions was flawed. The Court's decision meant that Dacorum and Welwyn Hatfield Councils were left without a housing target.

10.1.44 The previous Government started a 'repair' to the RS, to put back into the plan the housing numbers that were deleted by the High Court. However, the distribution of this housing was never decided, as the repair process was abandoned by the incoming Coalition Government.

10.1.45 Following the legal challenge decision, the Council carried out a detailed assessment of smaller scale potential locations at Hemel Hempstead and elsewhere in the Borough. This process resulted in the publication of the 'Assessment of Potential Local Allocations and Strategic Sites'. It first appeared in 2010 and has been revised on a number of occasions since: the most recent version (June 2012) is Examination Document HG15. This considered eight locational options (some with sub options) and recommended the following sequence for any Green Belt releases:

1. Marchmont Farm
2. Old Town (smaller part comprising land bounded by Fletcher Way)
3. West Hemel Hempstead (north)
4. West Hemel Hempstead (south)
5. Shendish (north)
6. Shendish (south)
7. Nash Mills
8. Felden

10.1.46 This assessment did not include any land outside Dacorum Borough Council's administrative control.

10.1.47 The process of considering alternative sites has also been informed by the evidence base documents, in particular the:

- Strategic Housing Land Availability Assessment (Examination Document HG7).
- Sustainability Appraisal Working Notes and Draft Sustainability Appraisal Report produced in conjunction with the Core Strategy consultation documents.
- Sustainability Appraisal Report (Examination Document SUB3) and Addendum (Examination Document SUB7)
- Compendium of Sustainability Appraisal Assessments of Potential Strategic Sites and Local Allocations by Settlement (Examination Document CS19).

10.1.48 Further information regarding the role played by Sustainability Appraisal in informing site selection is set out in response to Issue 1: question 1.3.

Transport infrastructure

10.1.49 The transport infrastructure required to support the proposed growth in Hemel Hempstead has been assessed in a number of technical studies and the following Examination Documents are particularly relevant:

REG13	Hertfordshire Local Transport Plan
TR2	Hemel Hempstead Traffic Model Future Year Issues Report
TR7	DIAMOND Application for South West Hertfordshire
TR10	Hemel Hempstead Urban Transport Plan
MP3	Hemel Hempstead Town Centre Masterplan – Access and Movement Study

10.1.50 In the light of the technical work, Policy CS8: Sustainable Transport puts the emphasis on sustainable transport measures. Policy CS9: Management of Roads states that in Hemel Hempstead, road improvements will focus on relieving congestion in and around the Maylands Business Park, including the delivery of a new north-eastern relief route, and improving the capacity and safety of the Plough Roundabout in the town centre. Policies CS33 and CS34 include further proposals to improve movement in Hemel Hempstead town centre and Maylands Business Park respectively.

10.1.51 The Council has worked closely with Hertfordshire County Council as highway authority and with the Highway Agency in considering the traffic implications of growth and the necessary infrastructure required. This has helped to ensure that the proposed improved infrastructure can be satisfactorily provided. The section on delivery following Policies CS8/9 and 33/34 includes a number of ways in which delivery can be achieved. For example, through transport proposals in the Site Allocations DPD and the East Hemel Hempstead AAP, and through working with the highway authorities and transport providers. Some schemes, such as the North East Hemel Hempstead Relief Route (see Core Strategy Figure 22), will be financed mainly or entirely by developer contributions (see Policy CS35: Infrastructure and Developer Contributions).

Conclusions

10.1.52 Hemel Hempstead is a Mark One New Town. It is the largest town in the Borough and has a population of just over 82,000 (2001 Census). The town is surrounded by Green Belt. Distinctive landscape features include the Grand Union Canal and the Gade and Bulbourne Valleys, with rivers that converge at Two Waters, south of the town centre. The topography of the town and the design of the New Town neighbourhoods draws the countryside in. The Old Town should be conserved – it is an attractive Conservation Area, with many listed buildings and a vibrant evening economy.

10.1.53 Hemel Hempstead will be the principal focus for housing, jobs and strategic services in the Borough, as proposed by the East of England Plan. The

Council's main priorities are the regeneration of the town centre and Maylands Business Park. Some limited outward expansion of the town is also justified, to help meet housing local needs.

10.1.54 The town centre is the largest centre for shops, business and commerce in Dacorum. However, many of the buildings and public areas are dated and some areas require significant improvement. There are major opportunities for regeneration in the town centre, as indicated in Policy CS33 and the Draft Town Centre Masterplan (Examination Document MP4).

10.1.55 Maylands Business Park will remain the main employment area in the Borough. There is a need for regeneration within the business park, whilst major employment growth is proposed at the Maylands Gateway site, as stated in Policy CS34.

10.1.56 The Two Waters and Apsley area is also important for employment opportunities, most of which should be retained. This area has seen considerable development and change in recent years, particularly for housing and out of centre retailing. This process is still continuing and the area is now a popular location for residential development.

10.1.57 The town has an extensive network of open land. It includes Gadebridge Park, Shrubhill Common and Boxmoor and generous open spaces in the New Town neighbourhoods. This network is a cherished and easily accessible asset, which should be retained and extended. The town's urban structure, character and biodiversity are recognised in the Vision Diagram.

10.1.58 One of the key issues has been how far outwards the town should expand and how would this change the character of the town. There is considerable scope for further housing development within the existing urban area, particularly in the town centre, at Apsley and in the Maylands Business Park. In addition, the Spencer's Park site in the north east of the town provides an important opportunity for substantial new housing on a greenfield non-Green Belt site. The Council is reluctant to extend the town. However, in order to achieve an appropriate overall level of housing in the borough, some limited Green Belt releases are felt to be justified on the edge of Hemel Hempstead. It is considered that Local Allocations LA1-LA3 offer the best solution (see response to question 10.3 below). In total, these sites have capacity for nearly 1,300 homes, 40% of which will be 'affordable'.

10.1.59 Seen within this context, it is considered that the approach set out within the Hemel Hempstead Place Strategy is both appropriate and justified.

10.2 What are the implications for Hemel Hempstead with regard to development on land to the east within St Albans City and District? Is the proposed boundary of the East Hemel Hempstead AAP appropriate and justified? Have all the opportunities for development to the east of Hemel Hempstead been robustly explored?

10.2.1 Paragraph 20.15 of the Pre-Submission Core Strategy explains that close liaison is required between Dacorum and St Albans Councils to ensure that the Maylands Business Park is allowed to grow and fulfil its potential as a premier business location in Hertfordshire and the wider region. Therefore, East Hemel Hempstead will be the subject of a separate Area Action Plan (AAP).

10.2.2 The AAP will build on the Maylands Masterplan (Examination Document ED4). This document was produced by Dacorum and St Albans Councils, the Maylands Partnership, the East of England Development Agency (EEDA), English Partnerships and various consultants. The AAP will also draw on the revised Maylands Gateway Development Brief, which is currently being prepared (the current version is ED5).

10.2.3 Paragraph 20.15 also states that the AAP will be progressed jointly by Dacorum and St Albans Councils. The response from St Albans Council to Dacorum's Pre-Submission Core Strategy supported the Core Strategy and joint working on the AAP. Even if the AAP is not ultimately a joint document, the needs of the area can still be delivered through a document covering just Dacorum's area, as long as appropriate references are included in the St Albans Core Strategy concerning the land to the east.

10.2.4 Paragraph 20.17 of the Pre-Submission Core Strategy provides a further explanation of why the AAP should deal with cross-boundary issues. The following paragraph then refers to facilities which it is very difficult to accommodate within the existing town boundary, or are more sensibly located outside. Many of these uses would either be acceptable under Green Belt policy or could be justified as exceptions based on need.

10.2.5 Figure 22 shows the proposed boundary for the AAP. However, representations received from St Albans Council requested that the land within their district shown as being within the AAP boundary should be referred to as an '*indicative study area*'. As a result, the Council has proposed minor changes to the Core Strategy regarding the AAP boundary (see minor changes MC75 and 81 in the Report of Representations: Examination Document SUB5). These amendments are shown below and St Albans Council has indicated that it is happy with them:

- Proposed minor change MC75 proposes the following additional text at the end of paragraph 20.15:

"The boundary of the Area Action Plan is shown on the Proposals Map for Dacorum. However, its easterly extent will be determined by St Albans Council through collaboration. It is indicated in Figure 22 as an area within which certain issues arising in Dacorum can be addressed (see below)."

- Proposed minor change MC81, which proposes to amend the notation for the boundary and the key to clarify that at this stage the boundary is indicative within St Albans District.

The proposed amended version of Figure 22 can be seen on page 122 of

Examination Document SUB5 Part 2.

- 10.2.6 The amended Figure 22 shows a proposed boundary for the AAP within Dacorum. The boundary reflects that of the Maylands Masterplan (ED4) and is focussed upon the Maylands Business Park – which is identified as a ‘Key Regeneration Area’ on the Key Diagram (Map 1). In addition, the AAP boundary includes the major housing development site of Spencer’s Park, except for phase 1 which already has planning permission for 372 homes. Figure 18 describes Spencer’s Park as prime residential land.
- 10.2.7 All the opportunities for development to the east of Hemel Hempstead have been robustly explored. This can be seen from the response to question 10.1 above. In particular this includes consultation on the ‘Blue Blobs,’ the ‘Assessment of Alternative Growth Scenarios for Hemel Hempstead’ and the ‘Assessment of Potential Strategic Sites and Local Allocations’ (Examination Documents CS5, HG10 and HG15). The former two documents were prepared jointly with St Albans District Council and looked at development options to the east of the town.
- 10.2.8 Any development to the east of Hemel Hempstead will be a matter for St Albans District Council as the local planning authority for that area. However, Dacorum would look to work collaboratively with ST Albans, as any development here would be an extension to Hemel Hempstead and would link to its services and facilities.
- 10.2.9 St Albans District Council’s Core Strategy is now called the Strategic Local Plan. A draft version of the Pre-Submission document is being considered by St Albans Council’s Planning Policy Advisory Panel in September 2012 (Examination Document REG19). The document is due to go to the St Albans Cabinet in October and the Full Council in November, prior to publication in December.
- 10.2.10 Paragraph 1.4 in the Draft St Albans Strategic Local Plan states that currently it is proposed to produce three development plan documents, including the East Hemel Hempstead Area Action Plan (jointly with Dacorum Borough Council). Paragraph 4.18 states that:
- “Joint working with Dacorum Borough Council on the East Hemel Hempstead Area Action Plan (AAP) has been initiated and is fully supported by this Council. Both Councils will continue to discuss the most appropriate AAP boundary and the range and scale of uses to be provided within the AAP.”*
- 10.3 Are the local allocations (particularly LA1 and LA2) justified and are the principles for their development sound?**
- 10.3.1 It is considered that all three of the local allocations are justified and that the principles for their development are sound. The overall process that the Council has been through to select the local allocations is explained question 10.1 above. Further information regarding each individual local allocations is given

below.

LA1: Marchmont Farm

- 10.3.2 Section 7.57 in the Dacorum Borough Local Plan Inspector's Report (Examination Document OT9) dealt with this site. The Inspector concluded (paragraph 7.57.3) that development in this location would have a limited impact on the purposes of the Green Belt. He recommended (paragraph 7.57.15) that the Council should seriously consider allocating the site for housing (285 dwellings) and amending the Green Belt boundary to this effect. In the event, the Council decided against allocating the site for housing, because it was not required to meet the housing target to 2011.
- 10.3.3 The Council's proposals for Local Allocation LA1, as stated on page 177 of the Pre-Submission Core Strategy, consist of around 300 new homes and an extension to Margaret Lloyd Park. The new housing will form an extension to the existing new town neighbourhood of Grovehill. It will be served by, and help support, the existing local centre and other local services and facilities.
- 10.3.4 In the Sustainability Appraisal Report (Examination Document SUB3), the findings on LA1 are summarised in section 6.7.1 and the full assessment is in Appendix F. It is concluded that housing development would have a number of positive and adverse effects, but no very adverse effects. The location is regarded as sustainable, whilst some of the adverse effects can be mitigated by structural landscaping and the careful layout of development.
- 10.3.5 A Statement of Common Ground concerning LA1 (Examination Document SG2) has been agreed between the Council and the landowner interests. The Statement of Common Ground (SCG) shows that the proposals for LA1 are deliverable and that a satisfactory development can be achieved that meets the Core Strategy's planning principles for the site. Paragraphs 3.1-3.4 in the SCG summarise the findings concerning LA1 in the Council's 'Assessment of Potential Local Allocations and Strategic Sites' (Examination Document HG15). It was concluded in HG15 that LA1 should be the first Green Belt site to be developed in Hemel Hempstead.
- 10.3.6 At present the site is farmed. Section 5 and Appendix 3 in the SCG show that the majority of the land is Grade 3b agricultural land. Therefore, development would accord with the NPPF (paragraph 112).
- 10.3.7 Further information on how the SCG addresses the Pre-Submission Core Strategy's planning principles for the site is given below:

Principle 1: two and three storey housing including around 40% affordable housing. Paragraph 10.2 in the SCG confirms that the site is capable of accommodating the dwellings sought by the Pre-Submission Core Strategy. Paragraph 10.4 states that the average density should be around 25 to 30 dwellings to the hectare, which will deliver a range of house types, dwelling sizes and tenures including affordable housing.

Principle 2: contributions towards educational and community facilities. This is a standard requirement and is justified on the basis of Core Strategy Policy CS35: Infrastructure and Developer Contributions, and advice from infrastructure providers.

Principle 3: layout, design, density and landscaping must create a soft edge with the adjoining Green Belt boundary. The initial concept for the site shows how this principle can be met – see the SCG, particularly sections 8 and 10 and Appendices 5 and 6.

Principle 4: new strategic landscaping. As with Principle 3, the SCG (particularly sections 8 and 10 and Appendices 5 and 6), shows how this principle can be met.

Principle 5: impact on local road network and promotion of sustainable travel options. The SCG addresses this issue, particularly in sections 4 and 10, and Appendices 2, 5 and 6.

LA2: Old Town

- 10.3.8 The Council's proposals for Local Allocation LA2, as stated on page 177 of the Pre-Submission Core Strategy consist of around 80 new homes.
- 10.3.9 In the Sustainability Appraisal Report (Examination Document SUB3), the findings on LA2 are summarised in section 6.7.1 and the full assessment is in Appendix F. It is concluded that housing development would have a number of positive and adverse effects, but no very adverse effects. Positive effects include the proximity to local facilities and the town centre.
- 10.3.10 LA2 is a Council owned site. At present, the site is used informally as open space, although it is not allocated for this use. It is a steeply sloping site, so there are no facilities on the site such as a children's playground or sports pitches. Gadebridge Park, Hemel Hempstead's main public park, is located immediately to the west, whilst Randall Park lies a short distance to the east. It is concluded that there is no need to retain the site as public open space.
- 10.3.11 In its capacity as the Commons Registration Authority for Hertfordshire, Hertfordshire County Council has informed Dacorum Borough Council that it has received an application to register LA2 as a town or village green (application reference VGR048). The County Council will in due course process the application, but it is not known when it will commence as there are other town or village green applications to be processed prior to VGR048. The County Council informed Dacorum Borough Council in August 2012 that although it is difficult to predict how long it will take to reach a decision, the case is likely to be processed within 18 months.
- 10.3.12 On receipt of the formal Notice of Application for VGR048 from Hertfordshire County Council, Dacorum Borough Council will resist the application. Even if the application is successful, this may not in itself prevent housing development as the Council may consider the possibility of making an application to the

Secretary of State under sections 16 and 17 of the Commons Act 2006 to de-register the site and provide replacement land as required by the Act. Therefore, the Council concludes that LA2 should remain in the Core Strategy in spite of the application to register the land.

10.3.13 The Council has produced Planning Statement for LA2 (Examination Document SG8), which shows that proposals for LA2 are deliverable and that a satisfactory development can be achieved that meets the Core Strategy's planning principles for the site. Appendix 1 to the Planning Statement is the 'Old Town Hemel Hempstead Deliverability Study', which has been produced by Tibbalds Planning & Urban Design and Campbell Reith (consulting engineers) on behalf of the Council. Appendix 2 is the 'Viability Assessment Report' for LA2, written by the Council's Strategic Housing Team Leader.

10.3.14 Further information on how Planning Statement for LA2 addresses the Core Strategy's planning principles for the site is given below:

Principle 1: two storey housing including around 40% affordable housing. The framework diagrams in the Deliverability Study are based on accommodating 80 two storey homes. The Viability Assessment Report concludes that a housing development including 40% affordable housing would be viable.

Principle 2: contributions towards educational and community facilities. This is a standard requirement and is justified on the basis of Core Strategy Policy CS35: Infrastructure and Developer Contributions, and advice from Infrastructure providers.

Principle 3: layout, design, density and landscaping in keeping with Old Town. The site adjoins the Old Town Conservation Area and the Deliverability Study includes framework diagrams which show how a development of around 80 homes can be delivered in a way which complies with this principle.

Principle 4: impact on local road network and promotion of sustainable travel options. Campbell Reith considered access and movement issues in the Deliverability Study and liaised on these issues with Hertfordshire County Council as highway authority. Page 6 of the Deliverability Study states that traffic generation from the site should be minimal and the County Council has confirmed that it does not propose to analyse the impact of the site in their traffic models. This page also indicates that the site is well located in respect of bus routes, footpaths and cycleways and that there is scope for improvements to pedestrian and cycle routes.

LA3: West Hemel Hempstead

10.3.15 The Council regards West Hemel Hempstead as a logical extension to the town. In fact, a broadly similar area to the currently proposed LA3 was shown as a proposed neighbourhood in the 1947 masterplan for the new town (see page 3 in the Draft Hemel Hempstead Town Centre Masterplan – Examination Document MP4).

10.3.16 550 homes and associated uses were proposed at West Hemel Hempstead in the 1998 Deposit Draft of the Dacorum Borough Local Plan. Section 7.33 in the Dacorum Borough Local Plan Inspector's Report (Examination Document OT9) dealt with this site. The Inspector expressed concerns about the visual impact on the countryside and the impact on the local road network. He recommended (paragraph 7.33.98) that the Council should reconsider the allocation of the land for housing and that the proposal should be deleted unless no other suitable land could be identified to accommodate the required housing. In the event, the site was deleted, because the Council decided that its preference was for development on the Manor Estate in Hemel Hempstead (site TWA4 on page 379 of the adopted Local Plan – Examination Document OT1).

10.3.17 The Council's proposals for Local Allocation LA3, as stated on page 178 of the Core Strategy, consist of:

- Up to 900 homes
- Shop, doctors surgery and additional social and community provision, including a new primary school

10.3.18 In the Sustainability Appraisal Report (Examination Document SUB3), the findings on LA3 are summarised in section 6.7.1 and the full assessment is in Appendix F. It is concluded that housing development would have a number of positive and adverse effects, but no very adverse effects. The adverse impact on the landscape of the Bulbourne Valley can be mitigated through the careful screening and layout of development, whilst the provision of new facilities such as a doctors' surgery and primary school will help alleviate concerns about distance from local facilities and the town centre.

10.3.19 A Statement of Common Ground concerning LA3 (Examination Document SG1) has been agreed between the Council and the landowner interests. The Statement of Common Ground (SCG) shows that the proposals for Local Allocation LA3 are deliverable and that a satisfactory development can be achieved that meets the Pre-Submission Core Strategy's planning principles for the site.

10.3.20 At present the site is farmed. The Dacorum Borough Local Plan Inspector stated (paragraph 7.33.17 of OT9) that it appeared that the majority of the land was Grade 3b and that loss of the land would not seriously undermine the viability of any farms. He did not consider that the loss of agricultural land was a reason to oppose development on the site. Therefore, development would accord with the NPPF (paragraph 112).

10.3.21 Further information on how the SCG addresses the Pre-Submission Core Strategy's planning principles for the site is given below:

Principle 1: two and three storey housing including around 40% affordable housing. Paragraph 5.16 in the SCG states that the site can accommodate approximately 900 houses, including a wide mix of two and three storey dwelling types, sizes and tenures.

Principle 2: contributions towards local services and facilities, including provision of a new 2 form entry primary school. Paragraphs 5.9-5.11 in the SCG deal with social and community uses. These paragraphs confirm that a range of community facilities will be provided, including a 2 form entry primary school, a doctors surgery and limited local retail provision. This is justified on the basis of Core Strategy Policy CS35: Infrastructure and Developer Contributions, and advice from infrastructure providers.

Principle 3: layout, design, density and landscaping must create a soft edge to the Green Belt and the extended open space. A 40-50 metre wide green corridor is proposed along Pouchen End Lane (SCG, paragraph 5.2). Paragraph 5.25 in the SCG states that the proposals shown in the Concept Plan (page 29 in the SCG) will result in a soft edge to the urban area and a new, clear and defensible Green Belt boundary.

Principle 4: impact on local road network and promotion of sustainable travel options. This is a key issue given the Local Plan Inspector's concerns in 2002 (see paragraph 10.3.16 above). Paragraph 3.6 in the SCG states that this issue has been reconsidered in detail. Traffic modelling undertaken by the Council has shown that the impact on the highway would be reasonable. Measures will be included to promote sustainable travel options (see the SCG paragraphs 4.26, 4.27 and 5.4-5.6).

Principle 5: no vehicular access from Pouchen End Lane. Paragraph 5.4 states that there would be no access from Pouchen End lane unless required for emergency purposes.

Principle 6: strategic landscaping to mitigate impact on Bulbourne Valley. This is another key issue that has been reconsidered in detail to address the Local Plan Inspector's concerns, as can be seen from paragraphs 3.6, 4.6-4.11 and 5.18-5.22 and the Concept Plan in the SCG. Paragraphs 4.6-4.11 refer to the Landscape and Visual Impact Report (Examination Document JS1). This report concluded that with additional structural landscaping the area has potential to accommodate development. The Landscape and Visual Impact Report also made recommendations for strengthening the landscape framework in order to avoid any wider landscape harm.

Principle 7: provision of new open space / playing fields. A substantial multi-functional green infrastructure network is proposed, including areas of open space and playing fields which exceed the current Local Plan standards (see SCG paragraphs 5.2, 5.7 and 5.8 and the Concept Plan).

Principle 8: Local road junction improvements. Paragraph 4.24 in the SCG states that a Means of Access and Transport Appraisal has been undertaken (Examination Document JS2). This shows (paragraph 4.25) that some relatively minor improvements to a number of local road junctions are required and can be accommodated within the highway boundary.

Principle 9: Extend Shrubhill Common Nature Reserve and create wider green infrastructure links. The comments on Principle 7 above apply also to Principle 9.

The proposed green infrastructure links include an extension to Shrubhill Common Nature Reserve, to ensure it remains connected to the countryside.

Principle 10: consider potential for a new cemetery. There is no explicit reference to this use in the SCG, although it has been raised with landowners. The Council is actively pursuing an alternative site for the cemetery i.e. land between Bedmond Road and Bunkers Park at Leverstock Green, Hemel Hempstead. If the Council's negotiations to purchase the Bedmond Road site prove unsuccessful, it would still be possible to locate the cemetery at LA3. Cemeteries are appropriate Green Belt uses and a cemetery could be accommodated at LA3, by extending the site. This would not affect the proposals in the SCG for housing and open space.

10.4 What public consultation has been undertaken with regard to LA2? Have the requirements of the Council's Statement of Community Involvement been met?

10.4.1 There has been extensive public consultation on the Core Strategy and this is set out in detail within the Report of Consultation (Examination Document SUB6). The key stages of consultation are listed below and are illustrated in Figure 2: Core Strategy Preparation Stages (in section 2 of the Pre-Submission Core Strategy):

Core Strategy preparation stages	Examination Document ref.	Date
Issues and Options	CS3	May 2006
Supplementary Issues and Options Paper – Growth at Hemel Hempstead	CS5	November 2006
Emerging Core Strategy	CS8	June 2009
Draft Core Strategy	CS16	November 2010
Pre-Submission Core Strategy	SUB1	October 2011

10.4.2 Before the proposed development at LA2 was included in the Pre-Submission Core Strategy, possible housing development at this location was included in two of the previous consultation documents:

- Page 30 of the Supplementary Issues and Options Paper – Growth at Hemel Hempstead (Examination Document CS5 - see paragraph 10.1.15 above) included the 'Old Town' as possible dwelling site 8. This site consisted of LA2 and a larger area to the north of Fletcher Way.
- In the Draft Core Strategy (Examination Document CS16), the Hemel Hempstead Place Strategy (chapter 21) proposed around 80 homes at LA2 under Housing Option 2 (but not with Option 1).

10.4.3 This consultation accords with the Council's Statement of Community Involvement (Examination Document OT2) (as summarised in Volume 7 of the Report of Consultation – Examination Document SUB6). There was also an opportunity to comment on the Sustainability Appraisal documents that accompanied all the above consultation stages of the consultation (Examination Documents CS4, 6, 9

and 17 and SUB3).

10.4.4 In addition, there has also been consultation on sites through the Site Allocations Development Plan Document (DPD). Page 77 of the Site Allocations Issues and Options consultation document in 2006 (Examination Document SA1) included the 'Old Town' as site H/h49 in a list of possible development sites. Further information about the potential sites was included in the 'Schedule of Site Appraisals' document (part of Examination Document SA1). From page 36 in this document and the maps in Appendix 1, it can be seen that Hh/49 related to LA2 and the larger area of land north of Fletcher Way. The consultation response on the Site Allocations consultation documents is summarised in a separate Report of Consultation (Examination Document SA9).

10.4 5 There has been no consultation solely on the issue of site LA2. Indeed, a separate consultation on LA2 was unnecessary and to have undertaken such a consultation would have been inappropriate. It is essential that the Council treats all the local allocations consistently – there is nothing to warrant LA2 being treated differently. There will, however, be further public consultation regarding the site through the Site Allocations DPD, which will include a detailed master plan.

10.5 Is the boundary of the Hemel Hempstead Town Centre appropriate and justified?

10.5.1 A distinction should be drawn between the town centre boundary shown in the Pre-Submission Core Strategy (Figures 19-21) and that in the Draft Hemel Hempstead Town Centre Masterplan (see Figure 1 in Examination Document MP4). The position is clarified through minor changes to Figures 19-21 that the Council has proposed. These changes are set out in minor changes MC78-MC80 in the Report of Representations (Examination Document SUB5). The revised Figures 19-21 can be found on pages 119-121 in Part 2 of SUB5.

10.5.2 The distinction between the boundary in the Pre-Submission Core Strategy and that in the Draft Town Centre Masterplan is appropriate and justified. This is because the boundary in the Core Strategy relates to a policy designation that is shown on the Proposals Map (Examination Document SUB2). In contrast, the town centre masterplan boundary is a study area. The two boundaries are largely alike, although the masterplan area has been enlarged to include two key areas of open land:

- The Bury, a listed building in the Old Town, referred to in section 5.1 of the Draft Town Centre Masterplan; and
- Paradise Fields, shown on Core Strategy Figure 21 and referred to in section 5.4 of the Draft Masterplan).

10.5.3 The town centre boundary is largely a continuation of that identified in the Dacorum Borough Local Plan (Examination Document OT1). This is appropriate, as the boundary still reflects the retail / commercial core of the town. There is only one significant difference, involving the inclusion of the Hospital Zone as part of the town centre. A few minor changes to the town centre boundary have also been made to remove anomalies. All these changes are shown on page 10 of the

Core Strategy Pre-Submission Proposals Map (Examination Document SUB2). Any necessary amendments to frontage designations will be made through the Site Allocations Development Plan Document, to ensure policy reflects changes in the relative commercial importance of different areas.

10.5.4 In view of the above, it is concluded that the boundary of the town centre as shown in the Core Strategy is appropriate and justified.

10.5.5 Turning to the issue of whether the Core Strategy should refer to the provision of a bus station, Policy CS33 sets out principles guiding development in Hemel Hempstead town centre. Guiding principle 2 (a) seeks to:

“secure an integrated public transport hub and circulation within the centre;”

10.5.6 The Draft Hemel Hempstead Town Centre Masterplan (MP4) proposes that the existing bus station on Waterhouse Street be replaced by a new bus interchange along Bridge Street/Marlowes (see section 5.5 (Marlowes Shopping Zone) of MP 4). Paragraphs 5.2.4.5 and 5.5.3.3 in the Draft Masterplan explain that the replacement of the bus station is crucial to the successful redevelopment of Market Square and wider regeneration proposals in this part of the town centre. The Draft Masterplan adds that the new bus interchange is located where users can easily access the town centre facilities and that there will be no change in the quality of the service. Indeed, the proposed interchange is closer to the main shops and will be able to accommodate more bus services than the existing bus station.

10.5.7 The proposed town centre bus interchange is addressed in the Statement of Common Ground between the Council and Hertfordshire County Council (Examination Document SG 4). This confirms that the County Council as highway authority now supports the approach set out in the Pre-Submission Core Strategy. This paragraph reads as follows:

“Dacorum Borough Council has clarified their intentions in relation to the provision of a bus station within Hemel Hempstead Town Centre. It is agreed that sufficient provision will now come forward in the Marlowes area; this is identified as part of the Town Centre Master Plan proposals.”

10.6 Are the requirements for the Maylands Business Park (CS34) justified and consistent with the advice in Figure 18?

10.6.1 The Hemel Hempstead Place Strategy states that the Maylands Business Park is the largest business park in the eastern region (Pre-Submission Core Strategy paragraph 20.2). However, as stated in paragraphs 20.4 and 20.5, there is a need to rejuvenate and expand the business park and promote the use of ‘green’ energy. Page 165 in the Pre-Submission Core Strategy sets out the vision for East Hemel Hempstead, whilst page 165 contains the local objectives for this area. Guidance on delivering the vision for East Hemel Hempstead is provided in paragraphs 20.14-20.19, Figure 18, Policy CS34 and Figure 22.

10.6.2 As indicated in Pre-Submission Core Strategy (paragraph 12.7), the majority of

the Borough’s employment jobs growth will be directed to the Maylands Business Park. The Maylands Gateway will provide a prominent new strategic employment location. Paragraph 12.12 refers to the significance of Maylands as a location for industrial and storage and distribution uses. Considerable scope exists for further such development. Figure 18 highlights the opportunity to form a new local centre in the Heart of Maylands.

10.6.3 In view of the crucial importance of the Maylands Business Park to the Borough’s future economic wellbeing, the Pre-Submission Core Strategy should contain a policy for this area that is ambitious, but realistic, and which is fully justified. It is considered that Policy CS34 achieves this aim.

10.6.4 The requirements in Policy CS34 are based on a substantial amount of technical work and previous policy statements, contained primarily in the following documents:

ED4	Maylands Masterplan: The Gateway to a Greener Future
ED5	Maylands Gateway Development Brief
AA1	East Hemel Hempstead Area Action Plan – Issues and Options Paper
ED9	Heart of Maylands Development Brief

10.6.5 A revised version of the Maylands Gateway Development Brief is currently being prepared. This is expected to give increased flexibility over the type of jobs to be provided to reflect current economic circumstances, whilst retaining the proposals for employment growth to meet longer term needs.

10.6.6 Discussions with landowners regarding bringing forward the proposed local centre in the Heart of Maylands are ongoing. Significant progress has been made on two of the three sites within the Heart:

- Site 1: the Council has received a variety of pre-application enquiries for retail and residential development. Talks are continuing with developers.
- Site 2: this site has been consolidated and the majority is now owned by CBRE. They are currently marketing the land to find a potential developer.

10.6.7 A number of other evidence base documents include important material relating to the Maylands Business Park, including:

ED7	London Arc Jobs Growth and Employment Land
ED8	South West Hertfordshire Employment Land Update
TR10	Hemel Hempstead Urban Transport Plan
ED11	Hertfordshire Strategic Employment Sites Study
ED12	Employment Land Update

10.6.8 Policy CS34 builds on this previous work. It reflects the Council’s regeneration aspirations and known development opportunities, especially the Maylands Gateway site. The policy is intended to provide a framework for the East Hemel Hempstead Area Action Plan (AAP). The need for the AAP is explained in

paragraphs 20.14-20.19 of the Pre-Submission Core Strategy (see also question 10.2 above).

10.6.9 Figure 18 describes the character zones in East Hemel Hempstead and the development opportunities available. Policy CS34 is consistent with the advice in this figure. Indeed, the penultimate paragraph in the policy states that specific opportunities for each character zone are identified in Figure 18. The purpose of Figure 18 is to illustrate the requirements of Policy CS34. The two are complementary and there are no conflicts between them. Also, as stated at the end of Policy CS34, the AAP will provide further guidance.

10.7 Are the opportunities in The Gade Zone (Figure 17 on page 169) clear and do they incorporate sufficient flexibility?

10.7.1 The Pre-Submission Core Strategy provides a level of planning guidance for the Gade Zone that is appropriate for a Core Strategy. Figure 17 states that this zone holds significant regeneration opportunities, primarily for educational, civic, residential, commercial and community uses.

10.7.2 Paragraph 21.13, which precedes Figure 17, stresses that the Town Centre Masterplan will provide further guidance, particularly on the areas of greatest change and activity. Policy CS33 provides overall planning policy guidance on Hemel Hempstead town centre and concludes by stating that a Town Centre Masterplan will elaborate this policy. The delivery section following Policies CS33 and 34 refers to the masterplan. It also mentions that the Site Allocations Development Plan Document will allocate sites, together with their planning requirements.

10.7.3 The Council considers that the guidance in Figure 17 on the Gade Zone is clear. However, in order to decide whether it incorporates sufficient flexibility, it is necessary to look at two documents that have been published in 2012 by the Council:

- The Gade Zone Planning Statement (Examination Document MP5)
- The Draft Hemel Hempstead Town Centre Masterplan (Examination Document MP4).

10.7.4 The Gade Zone Planning Statement provides detailed guidance on the broad policy, development and design framework for the Gade Zone. The Council's Cabinet recommended in April 2012 that the policy statement be incorporated into the Hemel Hempstead Town Centre Masterplan.

10.7.5 Pages 22-26 in the Draft Masterplan provide a detailed and clear planning strategy for the Gade and Original Marlowes Zones. Paragraph 5.2.4.1 in the Draft Masterplan deals with major land uses and the key proposed changes include:

- A new food store, college and Public Service Quarter.
- New residential development.
- Leisure, retail, business and cultural facilities and housing around Market Square.

10.7.6 Paragraph 5.2.2.5 in the Draft Masterplan proposes key changes regarding access and movement, including a cycle and pedestrian route along the River Gade.

10.7.7 It is evident that some of the key land use proposals for the Gade Zone, such as the new food store, are not mentioned in Figure 17. Also, Figure 17 does not refer to the proposed footpath/cycleway along the River Gade.

10.7.8 Therefore, it is proposed to make a further minor change to the Pre-Submission Core Strategy, by expanding the text in Figure 17 on the Gade Zone to reflect the Draft Town Centre Masterplan. This change would make Figure 17 sufficiently flexible. It is also proposed to make a further minor change to Policy CS33 to refer to the proposed food store (see the Council's response to Issue 5: question 5.4).

10.7.9 A planning application for a Morrison's superstore and a replacement building for West Herts College at the northern end of the Gade Zone is expected in late 2012. An application for the Public Service Quarter, including a replacement for the Civic Centre is expected to follow in 2013. The whole development is programmed for completion in 2016.

10.8 What is the Council's approach to development at Apsley (in particular Apsley Mills retail park). Is it appropriately reflected in the Core Strategy?

10.8.1 Before development of the New Town, Apsley contained the main concentration of jobs in the Hemel Hempstead area. It was an important location for paper making and the John Dickinson, Frogmore and Sappi mills were major local employers.

10.8.2 Apsley has been the focus of considerable development and change in recent years. Several sites have been redeveloped for housing. For example, the John Dickinson site was redeveloped to become Apsley Lock, whilst 450 homes are now being built on the former Sappi site. The Grand Union Canal and the railway station on the Euston line have made Apsley a very attractive location for residential development.

10.8.3 Apsley has also seen large scale out of centre retail development, at Apsley Mills Retail Park (Sainsbury's and retail warehousing) and adjacent to the local centre (Dunelm Mills and Wickes). Both these retail locations are accessed from London Road.

10.8.4 The high level of development in recent years has resulted in traffic on London Road (the A4251) in Apsley returning almost to the levels experienced prior to the construction of the A41 bypass (albeit without the same number of heavy goods vehicles). This is despite the fact that the bypass was intended to greatly reduce traffic in Apsley.

10.8.5 The Dacorum Borough Local Plan Inspector expressed concern about traffic congestion on the A4251 when considering an objection which proposed housing

at Shendish Manor (see paragraphs 7.59.28-7.59.40 and 7.59.45 in Examination Document OT9). Paragraph 7.59.39 is particularly relevant.

10.8.6 In the Dacorum Borough Local Plan (Examination Document OT1), detailed planning policy guidance for the Apsley Area is provided in the in the Two Waters and Apsley Inset. Paragraph 1.1 in the Inset states that comprehensive and co-ordinated planning and management is required over the Plan period to 2011 in Two Waters and Apsley in order to deal with a complex set of development pressures and opportunities for change. The policies for Two Waters and Apsley in the Dacorum Borough Local Plan remain valid and are 'saved.'

10.8.7 Paragraph 2.15 in the Inset states that the identification of opportunities for new development at Two Waters and Apsley should be guided by the following principles:

- to retain a satisfactory level of employment;
- to maintain a base of industrial activity and canal heritage;
- to develop the potential attractions of the industrial and canal heritage;
- to provide more housing;
- to create conditions in which the Apsley local centre can flourish; and
- to restrict growth of out-of-centre retailing.

10.8.8 Policy 39: Uses in Town Centres and Local Centres in the Dacorum Borough Local Plan classifies Apsley as a local centre with a neighbourhood shopping function. The schedule of Two Waters and Apsley Inset Proposal Sites at the end of the Inset Map section in the Local Plan includes some site specific proposals in the Apsley local centre.

10.8.9 Local Plan Policy 44: Shopping Development Outside Existing Centres contains a table of main out of centre retail locations. This table includes Sainsburys, Apsley Mills; the remainder of Apsley Mills Retail Park; and Homebase (now Dunelm Mills) and Wickes. The main uses shown in the table are food retailing at Sainsbury's and bulky non-food goods at the other locations. Policy 44 does not propose any further development at the Apsley Mills Retail Park. The policy requires proposals for further out of centre retailing at all the Borough's out of centre locations to demonstrate that a sequential approach to site selection has been followed, that there is a need for the development and that criteria (i) – (vi) in the policy are complied with.

10.8.10 Many of the Local Plan's major development proposals for Apsley have now been implemented or are under construction. Paragraph 20.2 of the Pre-Submission Core Strategy states that the area has benefitted from private-led regeneration of its former industrial base - a process which is continuing.

10.8.11 The Pre-Submission Core Strategy provides a level of planning policy guidance for Apsley that is appropriate for a Core Strategy. This guidance is much less detailed than that contained in the Dacorum Borough Local Plan. Paragraph 20.7 of the Pre-Submission Core Strategy refers to the important role for designated employment land in Two Waters and Apsley. Apsley should be retained as an alternative location for employment opportunities within the town,

although the Maylands Business Park and town centre are identified as the main locations for future employment growth.

10.8.12 With regard to retailing, the Pre-Submission Core Strategy carries forward the Local Plan's overall approach towards retail development in Apsley. Table 5 (Retail Hierarchy) in the Pre-Submission Core Strategy shows Apsley as a 'Local Centre with a neighbourhood shopping function'. Table 6 shows the locations referred to in local Plan Policy 44 as out of centre retail locations. Policy CS16 states that new floorspace will only be allowed outside of defined centres if the proposal complies with the sequential approach and demonstrates a positive overall outcome in terms of impact assessment.

10.8.13 More detailed planning policy guidance for Apsley will be provided in the Site Allocations and Development Management DPDs. This revised guidance will supersede the 'saved' policies in the adopted Local Plan.