

**DACORUM CORE STRATEGY**

**HEARING STATEMENT - EXAMINATION IN PUBLIC OF THE CORE STRATEGY**

**SECTION FIVE – STRENGTHENING ECONOMIC PROSPERITY**

**MADE ON BEHALF OF AVIVA INVESTORS**

**SEPTEMBER 2012**



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## **INTRODUCTION**

- 1.1** This Hearing Statement is prepared on behalf of our client, Aviva Investors, in respect of The Dacorum Core Strategy.
- 1.2** Aviva Investors own the Peoplebuilding site located on Marylands Avenue within Hemel Hempstead. It has been a long term stakeholder within Hemel Hempstead and has actively sought to deliver and secure investment within the town since it originally acquired the site.
- 1.3** The Hearing Statement is based on the representations made by the Company as part of the Pre-Submission Core Strategy consultation and is intended to assist the Inspector's consideration of the compliance and soundness of the Core Strategy.
- 1.4** We confirm that we will be attending the Hearing on the following days to provide oral representations in respect of the issues referred to within this Statement:
  - Wednesday 10 October (Issues 4 and 5); and
- 1.5** The representations made as part of this Statement are intended to assist the Company deliver significant economic growth and job creation within the Borough in the short, medium and long term.

## **ISSUES CONSIDERED IN THIS HEARING STATEMENT**

**2.1** The Issues that are dealt with as part of this Statement relate to the following:

5.1 Economic Growth

5.3 Employment Land Supply

**2.2** Each of the Issues listed above is dealt with individually below in Section 3.0 although commentary has been limited to the issues raised as part of the original representation submitted as part of the Pre-Submission Core Strategy Consultation as per the Guidance Notes.

## ASSESSMENT OF THE ISSUES

- 3.1 The individual issues which are considered as part of this Statement are set out below.

### Issue 5: Strengthening Economic Prosperity

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

- 3.2 Policy CS14 is considered to include an appropriate level of detail and is sufficiently clear and flexible in terms of delivering economic growth within the Borough. We support the Policy where it identifies the requirement for approximately 10,000 new employment positions and its allocation of appropriate sites for development to deliver these positions (i.e. town centres and the Maylands Business Park).
- 3.3 It is a concern that the indicator for Policy CS14 will be the net change in B1(a), B2 and B8 floorspace. It is not considered that B Use Classes alone can provide the economic development and jobs needed in Hemel Hempstead. In particular, there is an over supply of office accommodation and lack of demand which means that sites restricted to Class B1(a) floorspace will not be developed in the foreseeable future. The Policy relates to economic development (which is not limited to uses within Class B) and therefore the Policy should be explicit in that all forms of economic development (as defined) count towards reaching the target for new employment positions within the Borough.
- 3.4 We also support the specific objective of using employment generating land uses to deliver the regeneration of Hemel Hempstead and the Maylands Business Park. These two sites are already established locations for these land uses and are accessible ensuring that further development accords with the overarching objective of the NPPF to deliver sustainable economic development.
- 3.5 The Policy is not considered to be sufficiently aligned with the positive approach to sustainable economic development that underpins the NPPF. In respect of plan making, the NPPF requires authorities to ‘...positively seek opportunities to meet the development needs of their area’. Although Policy CS14 identifies areas for development, it does not then provide sufficient support for development at those sites which meet the objectives set out within the Policy in respect of economic growth and job creation. Once sites have been identified as

appropriate for economic development or employment generating land uses, the Core Strategy should provide explicit support for such development in accordance with the NPPF.

- 3.6** The proposal is flexible in respect of the nature of the land uses that can deliver the economic growth and job creation within the Borough and therefore it enables the Local Planning Authority to respond to changes in economic circumstances. It is important that this flexibility is carried through other policies within the Strategy to ensure the overall Plan is consistent.

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

- 3.7** As set out above in respect of Question 5.1, we support the objective to create 10,000 employment positions within the Plan period. By referring to job positions rather than floorspace provides in-built flexibility for the Local Planning Authority to respond to different development proposals which have different employment densities.
- 3.8** In terms of the references to 'minimum supply of land' and 'long term', the Policy is not sufficiently clear and these terms should be given clear definitions in order for the Plan to be effective.
- 3.9** Critically we would question the evidence basis for the requirement to deliver 131,000 sq. m of new office space to meet the requirements of the Borough and the Economic Strategy. As set out above in respect of CS14, there is considered to be an over supply of office floorspace and a lack of demand within the Borough. Recent evidence in respect of office take up rates do not indicate a requirement for such a significant increase in the quantum of office floorspace available within the Borough. It is important to highlight that planning permission was granted for approximately 20,000 sq. m of office floorspace at the People Building site at the Maylands Business Park and there has been insufficient demand to realise the significant quantum of floorspace that remains extant. The adoption of an inflexible policy framework would stifle potential development opportunities and is considered to be contrary to the NPPF.
- 3.10** The NPPF is explicit in stating that there should be a presumption in favour of developments which deliver sustainable economic growth. Policy CS15 must be consistent with this overarching national planning policy objective.

**3.11** Policy CS14 also seeks economic development to deliver the regeneration of sites including the Maylands Business Park. By adopting a policy framework which is too restrictive, the wider objectives of job creation and regeneration will not be realised.

**3.12** It follows that the Policy CS15 should be amended as follows:

- a. Include greater flexibility in respect of land use with provision made for all forms of economic development, subject to relevant design policies being met; and
- b. Flexibility in terms of the quantum of office floorspace required by the end of the Plan period – the Policy should be worded to state a target figure albeit subject to change based on updated market data as we progress through the Plan period. This would enable the Local Planning Authority to respond to changes in requirements and market factors.

## SUMMARY AND CONCLUSIONS

- 4.1** These Representations have been made on behalf of Aviva Investors in respect of The Dacorum Core Strategy.
- 4.2** They accord with the initial representations that were made on behalf of the Company in respect of the Pre-Submission Core Strategy consultation and are anticipated to assist the Inspector's consideration of the compliance and soundness of the document.
- 4.3** In accordance with the Guidance Notes, we provide a brief summary of these representations in respect of the relevant policies of the Core Strategy in Table 4.1.

**Table 4.1: Summary of Representations**

Policy	Comment	Legally Compliant	Sound	Proposed Amendment
CS14	Object	Yes	No – Ground (4): Compliance with National Policy	Policy CS14 should be amended to include more explicit support for economic development to accord with the NPPF as follows: <i>Hemel Hempstead will be the main focus for new economic development uses, which will be used to support the regeneration of the Maylands Business Park and Hemel Hempstead town centre. <b>Development proposals which deliver this objective will be supported by the LPA.</b></i>
CS15	Object	No	No – Ground (4) Compliance with National Policy.	Policy CS15 should be amended to include greater flexibility and deliver the regeneration of the Maylands Business Park by stating: <i>"New office uses and other employment generating uses (where necessary) will be allowed in core office locations and Hemel Hempstead town centre subject to high standards of design".</i>  The reference to a minimum of 131,000 sq. m of new office floorspace in Policy CS15 should include greater flexibility to respond to changes in the sector.

- 4.4** We trust that these representations will be afforded the appropriate level of weight by the Inspector and confirm our attendance on the relevant days of the Hearing.