



Report for:	Development Management Committee
Date of meeting:	13 December 2018
Part:	1
If Part II, reason:	

Title of report:	Article 4 areas for protecting Dacorum's Employment Areas
Contact:	<p>Cllr Graham Sutton, Portfolio Holder for Planning and Infrastructure</p> <p>Responsible Officer: James Doe, Assistant Director, Planning, Development & Regeneration</p> <p>Author: John Chapman, Strategic Planning and Regeneration Officer</p>
Purpose of report:	To consider the introduction of Article 4 Directions (under the Town and Country Planning (General Permitted Development) (England) Order 2015). The directions would require planning applications to be made in the designated areas for changes of use from office / light industrial / storage and distribution premises to residential use. It would cover selected employment areas in the Borough.
Recommendations	<ol style="list-style-type: none"> 1. That a local consultation be carried out, proposing that the areas referred to in section 6 of this report and shown in Appendix 1 be designated as Article 4 areas, within which permitted development rights for changes of use from B Class employment uses to housing will be withdrawn. 2. That the proposed Article 4 areas be classified as non-immediate directions, which will come into force 12 months from the start of the public consultation. 3. That the public consultation arrangements proposed in section 7 of this report be agreed. 4. That authority be delegated to the Assistant Director, Planning, Development & Regeneration to confirm the Article 4 Directions

	<p>following analysis of the response to the consultation, subject to the proviso that if substantive objections are received in respect of one or more of the proposed areas then the decision on those areas be referred back to the Committee.</p>
Corporate objectives:	<p>The introduction of the proposed Article 4 areas would help support the following corporate objectives:</p> <ul style="list-style-type: none"> • <i>Dacorum delivers</i>: e.g. provides a clear framework upon which planning decisions can be made; and • <i>Regeneration</i>: e.g. sets the planning framework for key regeneration projects, such as Hemel Hempstead town centre and the Maylands Business Park.
Implications: 'Value For Money Implications'	<p>This project can be completed within existing budgets.</p>
Risk Implications	<p>If Article 4 areas are not introduced, there is a risk that several further prior approval schemes will be brought forward, resulting in a serious under-provision of employment floorspace. Paragraph 3.6 below refers to other problems this would cause.</p> <p>There are two types of Article 4 directions: non-immediate directions and directions with immediate effect. With the former, there is a risk of further approval applications before the directions take effect. With the latter, there is a risk that the Council will have to pay out large sums in compensation (see section 7 of this report).</p>
Consultees:	<p>James Doe: Assistant Director, Planning, Development & Regeneration</p> <p>Andrew Horner: Team Leader – Strategic Planning</p> <p>Christopher Gaunt: Legal Governance Team Leader, Legal Governance Management</p>
Background papers:	<p>Dacorum Borough Local Plan 1991-2011</p> <p>Dacorum Core Strategy</p> <p>Dacorum Employment Land Availability Assessment</p> <p>Dacorum Site Allocations Development Plan Document</p> <p>General Permitted Development Order</p> <p>Heart of Maylands Development Brief</p> <p>Maylands Masterplan</p> <p>Maylands Gateway Development Brief</p> <p>MHCLG consultation paper: "Planning Reform: Supporting the high street and increasing the delivery of new homes".</p> <p>National Planning Policy Framework</p> <p>Planning Practice Guidance: When is permission required?</p> <p>St Albans Local Plan pre-submission version</p>

	South West Hertfordshire Economic Study
Glossary of acronyms and any other abbreviations used in this report:	<p>B class uses: offices, industrial and storage and distribution</p> <p>CS: Core Strategy</p> <p>GPDO: General Permitted Development Order</p> <p>NPPF: National Planning Policy Framework</p> <p>PPG: Planning Practice Guidance</p> <p>SA: Site Allocations</p>

1. Planning policy context for employment land and floorspace

(i) National context

1.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. The NPPF states that sufficient land of the right types should be available in the right places and at the right time to support growth, innovation and improved productivity. The Government's Planning Practice Guidance on 'Housing and economic land availability assessment' guides councils in identifying land to meet development needs.

(ii) Local context

1.2 Dacorum Core Strategy Policy CS14 (economic development) states that sufficient land will be allocated to accommodate approximately 10,000 additional jobs 2006-2031. Also, most employment generating growth will be located in town and local centres and General Employment Areas.

1.3 Policy CS15 (offices, research, industry, storage and distribution) states that a minimum area of land, including General Employment Areas and town centres, will be identified and retained for B class uses (i.e. offices, industrial and storage and distribution). The policy proposes around 131,000 sq. metres (net) of additional office floorspace 2006-2031 and that floorspace for industry and storage/distribution remains broadly unchanged.

1.4 The Site Allocations Development Plan Document defines General Employment Areas in Policy SA5, whilst employment areas in the Green Belt come under Policy SA8. Maylands Business Park is not covered by the Site Allocations document, so the General Employment Areas there are still as shown in saved Policy 31 of the Dacorum Borough Local Plan 1991-2011. However, it is also necessary to take account of the more recent non-statutory proposals in the Maylands Masterplan and the Maylands Gateway Development Brief.

1.5 Currently, the employment land evidence base for the new Dacorum Local Plan is being assembled, as explained below:

- The South West Hertfordshire Economic Study (2016) forecast a need for a substantial increase in office floorspace to 2036, but little change in industrial and storage and distribution space.
- The Dacorum Employment Land Availability Assessment (2017) indicated that market demand pointed to a need for more industrial and warehousing space,

rather than offices. It also advised that most sites currently in B class use should be retained.

- An update to the 2016 study is underway and is taking a fresh look at the future need for employment floorspace and sites.

2. Permitted development rights for changes of use from employment uses to housing

2.1 In recent years, the Government has introduced significant deregulation of planning. Since 2013, this has included the creation of national permitted development rights under the General Permitted Development Order. The aim is to encourage the creation of new housing by changes of use of employment buildings to housing.

2.2 The permitted development rights mean that planning permission is granted for certain changes of use to housing, subject only to 'prior approval' of some detailed matters. This applies to buildings occupied for employment purposes, as well as vacant buildings. Prior approval cannot be refused on the grounds that the loss of employment floorspace would be contrary to the Council's planning policies. Also, the Council is unable to require any affordable housing or other section 106 contributions on prior approval schemes and the application fee payable is only £96.

2.3 The table summarises how the prior approval regime operates:

Changes of use from	Time limits	Matters that can be considered in determining applications	Does prior approval apply to all changes of use to housing?
B1(a): offices	None	Highway impacts, contamination, flood risk, noise	Yes
B1(c): light industry	Time limited to 30 September 2020	As above, plus some aspects of commercial/service provision	Applies only in certain circumstances, including if: <ul style="list-style-type: none"> • the floorspace does not exceed 500 sq. metres • the building is not listed • the building has been used solely for light industry (with existing B1(c) buildings) or storage and distribution (with existing B8 buildings)
B8: storage and distribution	Time limited to 10 June 2019		

2.4 In October 2018, the Ministry of Housing, Communities and Local Government published a consultation paper "Planning Reform: Supporting the high street and increasing the delivery of new homes". This paper includes a section on permitted development rights and use classes. Changes proposed include:

- Allowing building types in particular uses (including commercial) to be built upwards to provide new homes.
- Making permanent the currently time limited change of use from class B8 to housing.

- Exploring the feasibility of a new permitted development right allowing redevelopment of existing commercial buildings for residential use.

3. Impact of the prior approval regime in Dacorum

3.1 Since 2006 (the start of the Core Strategy plan period), office floorspace in Dacorum has declined by 75,000 sq. metres and industry, storage and distribution floorspace by 31,000 sq. metres. These declines are not consistent with Core Strategy Policy CS15 (see paragraph 1.3 above). This is particularly so with offices. Nevertheless, the total number of jobs in the Borough has been rising at a faster rate than proposed in Policy CS14 and unemployment is very low.

3.2 Dacorum is experiencing a significant loss of office floorspace from prior approval schemes involving changes of use from offices to housing:

- Between 2014 and 2018, there was a loss of 17,300 sq. metres of office floorspace.
- Permitted prior approval schemes, including approvals since 31 March, involve the loss of a further 27,800 sq. metres of office floorspace.
- Completed and permitted prior approval schemes (if implemented) will result in a total loss of over 45,000 sq. metres of offices. This is a major factor in Dacorum's employment land supply. This is enough space for over 3,000 office jobs.

3.3 Nearly all of the completed and permitted losses of office space from prior approval schemes are in the town centres or General Employment Areas (see table below). Indeed, 50% of the losses are in Hemel Hempstead town centre, causing a significant decline in the town centre's role as an office centre. Half of the losses in the General Employment Areas are on the Maylands Business Park.

3.4 The table below shows the location of the ten largest completed and permitted losses of office floorspace from prior approval schemes:

Location	Settlement	Policy designation	Floorspace loss (sq. metres)	Progress
Viking House, Swallowdale Lane	Hemel Hempstead	General employment area – Maylands Business Park	1,902	Completed
Swan Court, Waterhouse Street	Hemel Hempstead	Town centre	3,111	Completed
Corner Hall	Hemel Hempstead	General employment area	4,465	3,700 m ² completed
Bryanston Court, Selden Hill	Hemel Hempstead	Town centre	5,788	Under construction
Normandy Court, 1 Wolsey Road	Hemel Hempstead	Town centre	1,600	Completed
Akeman Business Park, Akeman Street	Tring	General employment area)	3,000	Not started

Grovelands Business Centre, Grovelands	Hemel Hempstead	General employment area – Maylands Business Park	4,266	Not started
Hamilton House, 111 Marlowes	Hemel Hempstead	Town centre	3,340	Not started
Hempstead House, 2 Selden Hill	Hemel Hempstead	Town centre	2,437	Not started
Vantage House, 23 Mark Road	Hemel Hempstead	General employment area – Maylands Business Park	1,720	Not started

3.5 Some of the prior approval schemes involve older office buildings, which are unattractive for continued office use. In a number of cases, the external appearance of the building has been changed and additional flats built on the roof (e.g. Swan Court).

3.6 However, there are some worrying trends arising from prior approval schemes. Apart from the overall loss of office floorspace and the lack of affordable housing/other S106 contributions noted above, other causes for concern are as follows:

- Most office buildings subject of prior approval schemes were still occupied at the time of the application, so many firms have been displaced when schemes have been implemented.
- Some prior approval schemes involve good quality, relatively modern buildings such as Corner Hall and Normandy Court, well suited for continued office use.
- As normal development management policies cannot be applied, there is a danger of poor quality housing developments being provided.
- Enclaves of housing may appear in the middle of employment areas, remote from services and the community (which runs counter to how our towns function). For example, two prior approval schemes have been approved in Boundary Way on the Maylands Business Park, a considerable distance from any existing housing.
- The introduction of housing into employment areas may place constraints on businesses, which need the space to operate without limitations on noise, hours of operation etc. Such limitations could be bad for business and affect investment in the future.

3.7 In contrast to the position with offices, no prior approval schemes for losses of light industrial or storage and distribution floorspace have been permitted. This probably reflects the nature of B1(c) and B8 buildings (often unsuitable for residential use), the later introduction of prior approval arrangements for such changes of use and the restrictions that apply (see right-hand column in table in paragraph 2.3 above).

4. How can the Council protect Dacorum's employment areas?

4.1 Given concerns over the loss of employment floorspace (particularly offices), some councils have used powers under Article 4 of the General Permitted Development Order (GPDO) to withdraw permitted development rights for changes of use to housing. Locally, Article 4 directions have been introduced by St Albans, Three Rivers and Watford Councils. This Council could do likewise, in order to protect our most important employment areas.

4.2 NPPF paragraph 53 states that:

“The use of Article 4 directions to remove national permitted development rights should be limited to situations where this is necessary to protect local amenity or the well-being of the area...”

4.3 Further information on Article 4 directions is contained in the Government’s Planning Practice Guidance (PPG) on “When is permission required?”. The following points in the PPG are particularly relevant:

- An Article 4 direction means that a particular development cannot be carried out under permitted development, so needs a planning application. This gives a local planning authority the opportunity to consider a proposal in more detail.
- A planning application fee is payable where development that would otherwise have been permitted development requires a planning application.
- If a local planning authority makes an Article 4 direction, it can be liable to pay compensation to those whose permitted development rights have been withdrawn. This is only so if permission is refused for development which would otherwise have been permitted development, or is permitted subject to conditions more limiting conditions than the GPDO.
- The grounds on which compensation can be claimed are limited to abortive expenditure or other loss or damage directly attributable to the withdrawal of permitted development rights.
- There are two types of directions under the GPDO: non-immediate directions and directions with immediate effect. In all cases, an Article 4 direction cannot be confirmed until after the local planning authority has carried out a local consultation.

4.4 With regard to bullet points 3 and 4 above, compensation is payable only if a planning application is made within 12 months from the date that the Article 4 Direction takes effect. No liability to pay compensation arises where 12 months’ notice is given before the Article 4 Direction comes into force.

5. Justification for Article 4 areas to control changes of use to housing in Dacorum

5.1 It is considered that there is a strong justification for designating Article 4 areas to control changes of use to housing in Dacorum’s most important employment areas, for the following reasons:

- Article 4 areas are justified to protect employment land in Dacorum, given the national and local planning policy context (see section 1 above) and the substantial loss of employment floorspace that is occurring, contrary to the Council’s planning policies (section 3).
- A large amount of office floorspace is being lost in the Borough as a result of the prior approval regime (section 3).

- Most of the losses from prior approval schemes are located in the Council's most important employment areas, particularly Hemel Hempstead town centre and the general employment areas (section 3).
- There are a number of worrying trends arising from prior approval schemes, as explained in paragraph 3.6 above.
- Due to the loss of existing employment buildings and proposed employment sites, Dacorum's employment land supply is now very limited. Therefore, the Council is considering whether exceptional circumstances exist that justifies releasing Green Belt land for employment development in the new Local Plan (see paragraphs 5.2-5.4 below).
- The Hertfordshire Local Enterprise Partnership is concerned about the loss of employment space across the county. It has commissioned consultants to establish an evidence base, explore the implications of floorspace losses and identify potential solutions.
- Vacant office floorspace in Hemel Hempstead has roughly halved since the recession (paragraphs 5.5 and 5.6).
- Further significant losses of employment floorspace to housing in Dacorum from prior approval schemes seem likely if Article 4 areas are not introduced (paragraphs 5.5 and 5.6).

5.2 With regard to bullet point 5 above, there are only two major employment development sites currently under construction or allocated. Both these sites are in Maylands Gateway, close to M1 Junction 8:

- Prologis are currently building a large industrial/warehousing development.
- The Council owns a greenfield site immediately to the east of the Prologis site. This site is expected to be marketed shortly and is suitable for a mix of office and industrial/warehousing development.

5.3 There are some smaller sites with potential for B class floorspace, but on several of these sites there is uncertainty over whether employment development will actually occur. The overall conclusion is that if there is no change to existing planning policies and allocations, there is likely to be:

- A further net decline in office floorspace.
- No significant net change in industry and storage and distribution floorspace once the current Prologis development in Maylands Gateway is completed.

5.4 The Pre-submission version of the St Albans Local Plan (i.e. the Draft Plan) proposes a very large (55 hectare) employment site at East Hemel Hempstead. A mix of office and industrial/warehousing development is proposed. This site is located east of the sites mentioned in paragraph 5.2 above. However, this proposal is not confirmed (the land is currently in the Green Belt) and St Albans District Council has not agreed that any of the jobs on this site can count towards meeting Dacorum's needs, although negotiations are continuing.

5.5 The Council has commissioned advice from Brasier Freeth, local commercial agents. Brasier Freeth are looking at whether residential values make further prior approval

schemes to change B class buildings to housing commercially attractive. They have produced a draft report, containing information on office, light industrial, storage and distribution and residential values in the following employment areas (see maps in Appendix 1):

Location	Policy designation
Maylands Business Park, Hemel Hempstead	General employment area
Park Lane, Hemel Hempstead	Town centre
Doolittle Meadows, Hemel Hempstead	General employment area
Chancerygate Business Centre, Whiteleaf Road, Hemel Hempstead	General employment area
Northbridge Road and River Park, Berkhamsted	General employment area
Icknield Way, Tring	General employment area
Bourne End Mills, Bourne End	Employment area in the Green Belt

5.6 In respect of the last two bullet points in paragraph 5.1, the draft Brasier Freeth report shows that:

- Vacant office floorspace in Hemel Hempstead has roughly halved from over 700,000 sq. feet during the 2008/2009 downturn to 358,000 sq. feet.
- Residential land values in the key General Employment Areas and Hemel Hempstead town centre are generally much higher than office and light industrial/warehousing values. This gives landowners and developers a financial incentive to bring forward prior approval schemes.

5.7 The Assistant Director, Planning, Development & Regeneration made a presentation on the potential Article 4 areas to Hemel Hempstead Business Ambassadors on 15 November 2018. The idea of protecting key employment areas through in this way was well received and a letter of support from the Ambassadors is expected.

6. Which areas should be designated as Article 4 areas?

6.1 Paragraph 5.5 above lists the employment areas considered by Brasier Freeth in their report. The table below summarises Brasier Freeth's draft conclusions on these areas. It also sets out key points on these areas from the Dacorum Employment Land Availability Assessment (2017), produced for the Council by consultants Peter Brett Associates. Brasier Freeth's draft overall recommendation is that all these areas should be protected. This reflects the pressure from residential developers to buy permitted development opportunities

Location	Dacorum Employment Land Availability Assessment	Draft Brasier Freeth report
Maylands Business Park, Hemel Hempstead	Maylands is the largest employment site in the borough, providing a mixture of purpose built office and industrial accommodation. Should be safeguarded for its existing employment use.	Maylands is a mixed use employment area located adjacent to junction 8 M1 motorway. It is the largest commercial area in Dacorum by a considerable margin.

Park Lane, Hemel Hempstead	The assessment looked at Hemel Hempstead town centre as a whole, not individual buildings. Offices were generally well occupied, but the town centre struggles to attract new occupiers, due to the distance from the station, lack of car parking and lack of good quality modern space.	Contains two of the remaining office buildings of note in Hemel Hempstead town centre i.e. One Park Lane and Park House. One Park Lane is a 1989 headquarters building, which has been well maintained and has a good car parking ratio.
Doolittle Meadows, Hemel Hempstead	Comprises high quality office buildings. Should be safeguarded for its existing employment use.	Building quality varies hugely. Westside was comprehensively refurbished in 2016 and is a Grade A (top quality) building. Meadowside and Network House are 1980's buildings, not refurbished. There is good access to the mainline rail and M25 Junction 20.
Chancerygate Business Centre, Whiteleaf Road, Hemel Hempstead	Should be safeguarded for its existing employment use.	This 34 unit industrial development was built in 2007. The unit sizes vary from 3-6,000sq.ft. The front 10 units have a trade counter planning consent.
Northbridge Road and River Park, Berkhamsted	In general, the site is well occupied and should continue to be safeguarded. It is the main employment site in Berkhamsted.	These are the main industrial and employment areas in Berkhamsted. The buildings are generally well maintained.
Icknield Way, Tring	This site is well laid out, with adequate parking and servicing to all units. Should be safeguarded for its existing employment use.	Icknield Way is an important estate in north Dacorum. It is home to a number of excellent businesses and a skilled workforce. It is fully let (including premises under offer).
Bourne End Mills, Bourne End	The site is well located adjacent to an A41 junction. Most of the site was being redeveloped when the assessment was prepared. Should be safeguarded for its existing employment use.	This newly built estate has proved a popular location. The A41 gives easy access to the M25 motorway at junction 20. All but one of the new units were sold off plan to owner occupiers.

6.3 In view of the points made in section 5 of this report and the evidence in the Dacorum Employment Land Availability Assessment and draft Brasier Freeth report, there is a strong justification to designate all the above areas as Article 4 areas.

6.4 It is, however, considered that some parts of Maylands Business Park should be excluded from the Article 4 area. The areas proposed for exclusion are shaded green and called Areas A-F on the Maylands map in Appendix 1. The table below explains why it would be appropriate to exclude these areas:

Area	Location	Areas proposed for exclusion from Maylands Article 4 area
A	Land north of the Nickey Line	This land is identified as an 'Area of residential opportunity' in the Core Strategy (Figures 18 and 22). Also, part of this area is currently in non-B class use (e.g. Aldi supermarket) and some of the rest has little or no built floorspace.
B	Viking House, Swallowdale Lane	This site is currently being redeveloped for housing. Also, it is on the edge of the Maylands Business Park.
C	Heart of Maylands, Maylands Avenue (south) and Hales Park	Part of this area is covered by the Heart of Maylands Development Brief, which proposes redevelopment for mixed uses. The whole area is changing rapidly from a predominantly B class area to a vibrant mixed use area, with retail, food and drink, leisure, hotel and residential uses, as well as B class uses. Hales Park area is already in residential use.
D	Swallowdale Lane/Three Cherry Trees Lane	There is a safety hazard area in the vicinity of the Gist site. It is thought that this area was defined when BOC stored gas there. Even though gas storage may have ceased, it could be resumed without any further consent being required. The GPDO stipulates that permitted development rights for changes of use to residential do not apply in 'safety hazard areas'. This includes the consultation zones around hazardous sites.
E	Boundary Way/Buncefield Lane	Part of this area (e.g. cemetery and caravan park) are not in B class use. Also, this area includes the Buncefield Oil Terminal and land within the Health and Safety Executive's consultation zones around Buncefield. As stated under 'D' above, permitted development rights for changes of use to residential do not apply in such areas.
F	Breakspear Way/Buncefield Lane (south)	The Holiday Inn and the BP filling station/Marks and Spencer convenience store are not in B class use.

7. Processes for designating Article 4 areas

- 7.1 Paragraph 4.3 above stated that there are two types of directions (non-immediate directions and directions with immediate effect). Also, directions cannot be confirmed until after the local planning authority has carried out a local consultation. However, the GPDO requires different procedures to be followed for each type of direction.
- 7.2 Paragraphs 4.3 and 4.4 above explained that the local planning authority can be liable to pay compensation in certain circumstances. However, no liability to pay compensation arises where 12 months' notice is given before the Article 4 Direction comes into force.
- 7.3 The disadvantage of opting for non-immediate directions is that the Council may be faced with a number of prior approval applications during the 12 month period, as landowners and developers rush to beat the deadline. This possibility must be balanced

against the real risk of the Council having to pay out very large sums in compensation if directions are introduced with immediate effect.

7.4 It is concluded that the prudent approach would be to opt for non-immediate directions. If the Committee agrees, the main steps to be followed in designating the Article 4 areas are as shown below:

GPDO's requirements (summary of key points)	Recommended approach
<p>Notice of any directions made must be given by:</p> <p>(a) local advertisement; (b) site notices; and (c) serving the notice on the owner and occupier of every part of the land within the area or site to which the direction relates, unless it is impracticable to do so.</p>	<p>The requirements of (a) and (b) must be met. Compliance with (a) should include:</p> <ul style="list-style-type: none"> • A public notice in the local paper • Information on the Council's website • A mention in the Council's Ambassador Place Manager's monthly business update to about 3,000 firms and weekly email to the Ambassadors <p>However, (c) is considered impracticable. This conclusion reflects the very high number of owners and occupiers in the proposed Article 4 areas.</p>
<p>The notice referred to above must:</p> <p>(a) describe the development and area to which the direction relates and the effect of the direction. (b) state where the direction can be inspected. (c) specify a period of at least 21 days within which representations concerning the direction may be made. (d) specify the date on which it is proposed that the direction will come into force.</p>	<p>All these requirements must be met.</p> <p>It is considered that:</p> <ul style="list-style-type: none"> • the consultation should start in early January 2019. • A six week period should be allowed for representations to be submitted. • The proposed date when the directions will come into force should be 12 months from the start of the consultation.
<p>The local planning authority must notify the Secretary of State of the direction on the same day that notice of the direction is first published or displayed.</p> <p>The County Council must also be informed.</p>	<p>These requirements must be complied with.</p> <p>The Council also needs to produce a justification statement, setting out the case for the Article 4 areas. This statement will draw mainly on the evidence contained in this report and the final report from Brasier Freeth.</p>
<p>The direction comes into force on the date specified, but only if confirmed by the local planning authority.</p> <p>In deciding whether to confirm a direction, the local planning authority must take into account any representations received during the consultation period.</p>	<p>These requirements must be complied with.</p> <p>It is recommended that authority be delegated to the Assistant Director, Planning, Development & Regeneration to confirm the Article 4 Directions following analysis of the response to the consultation, subject to the proviso that if substantive objections are received in respect of one or more of the proposed areas then the decision on those areas be referred back to the Committee.</p>

<p>The local planning authority must, as soon as practicable after a direction has been confirmed:</p> <p>(a) give notice of the date on which the direction will come into force; and (b) send a copy of the confirmed direction to the Secretary of State.</p>	<p>These requirements must be complied with.</p>
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8. Conclusions

- 8.1 It is considered that this report provides clear justification for designating Dacorum's key employment areas as Article 4 areas. The Article 4 directions will require planning applications to be made in the designated areas for changes of use from office / light industrial / storage and distribution premises to residential use. Members are requested to agree the recommendations at the start of this report.

Appendix 1: Maps of proposed Article 4 areas