



Employment and Skills Supplementary Planning Document (SPD)

Consultation Report

January 2023

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1. Introduction

1.1 The Employment and Skills Supplementary Planning Document (SPD) is a tool that will enable the Council to ring-fence opportunities arising from development to benefit Dacorum's residents, thereby generating additional social value. The purpose of the SPD is to increase local employment opportunities, help businesses to find suitable local staff and suppliers, improve the skills of local people, support businesses already located in Dacorum to grow and attract new businesses into the area.

1.2 The Council are grateful for the time residents, businesses and organisations have spent engaging with this document. This Consultation Report sets out the engagement process in detail, summarises the main issues raised and sets out the Council's response.

1.3 This report is structured as follows:

Section 2. Consultation Report: explains how we engaged in accordance with our Statement of Community Involvement, including the methods we used and the overall level of response.

Section 3. Analysis of Responses: we expand on the points raised in the comments on the document or expand further on the points raised in the comments

Section 4. Next Steps: sets out the adoption timetable for the SPD.

Appendix A. Supporting Information: provides copies of the key materials used to advertise the consultation. This includes copies of the notification for the consultation and the public notice.

Appendix B. Full Text of Responses: contains full copies of all the individual responses made to the consultation.

2. Consultation Report

2.1 Background

- 2.1.1 The consultation on the Employment and Skills – Draft Supplementary Planning Document (SPD) was undertaken in accordance with Regulations 12 and 13 of the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012. The consultation was also carried out in accordance with the requirements set out in the Statement of Community Involvement (SCI), adopted by the Council in 2019.
- 2.1.2 The consultation sought views and opinions from residents, businesses and organisations on a full draft version of the SPD. This follows internal engagement with the Council's Economic Development and Development Management teams and Hemel Garden Communities. Development of the SPD was supported by Hertfordshire Community Wealth Building Project and ongoing progress was shared with the Project Steering Group (a sub group of the Hertfordshire Growth Board) and the Hertfordshire Planning Group, attended by planning officers representing the Hertfordshire local authorities.
- 2.1.3 The statutory public consultation took place between 12pm on the 28th October 2022 and 11:59pm on the 28th November 2022. This satisfies the requirement to consult for a four week period, which is specified in the SCI.
- 2.1.4 The consultation draft document can be viewed on our online consultation portal¹.

2.2 Engagement Methods

- 2.2.1 Everyone who was on the Council's Strategic Planning consultation database at the time of the consultation start date was notified of the consultation by e-mail, or by post mail where no e-mail address was recorded. This included specific (statutory), general and other consultation bodies, alongside the wider community.²
- 2.2.2 The Council sent a separate notification of the consultation by e-mail to; Town and Parish Clerks within the Borough, elected County Councillors for Dacorum, and all of Dacorum Council's elected members and its Senior and Corporate Leadership Team.
- 2.2.3 The Council used a variety of engagement methods to advertise the consultation. Full details of the methods and levels of engagement are listed below. The figures stated below refer to the documents provided in Appendix A: Supporting Information.

¹ <https://consult.dacorum.gov.uk/kse/event/37167>

² As set out in Part A, Section 3: 'Who We Consult' of the SCI: <https://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/statement-of-community-involvement>

Digital

- Dacorum Current Consultation Website: 48 page visits.
- Dacorum Additional Planning Document Website: 503 page visits.
- Consultation Portal (figure 1): 560 views from 326 users.

Notification

- Consultation Database Notifications (figure 2 and 3):
 - 7,002 E-mail (one to each registered consultee for each consultation).
 - 2,096 Postal (one letter to each consultee covering both consultations).

Public Notice

- Public Notice in Newspaper published in the Hemel Gazette on 26th October 2022 (figure 5 and 6).
- Public Notice published online on the Hemel Today website on 26th October 2022 (figure 7).

Press/Media

- Media release sent to 359 media contacts for wider circulation.

Publications

- An article was published in the digital Dacorum Life Newsletter on the 3rd November 2022 (figure 8): 12,337 subscribers.

Social Media

- The consultation was advertised to 4,573 connections on LinkedIn.

Hard Copy Documents

- Hard copies of documents were made available for public inspection throughout the whole consultation period at the three deposit points listed within the SCI:
 - The Forum.
 - Berkhamsted Civic Centre.
 - Victoria Hall.
- Hard copies of documents were also made available for the public in the reference section of the seven libraries located in Dacorum during their normal opening hours:
 - Adayfield Library.
 - Berkhamsted Library.
 - Bovingdon Community Library.
 - Hemel Hempstead Library.
 - Kings Langley Community Library.
 - Leverstock Green Community Library.
 - Tring Library.
- Hard copies of documents were made available to purchase from Strategic Planning.

Town and Parish Councils within the Borough

- The Council separately notified the 16 Town and Parish Councils in the Borough by e-mail (figure 4). This notification established that, if requested, the Council had made hard copies of the document available without cost to ensure that the town/parish council could hold their own reference copy.

Dacorum Borough Council's Elected Members

- Notified 51 Dacorum Elected Members by e-mail.
- Notified 10 County Councillors for Dacorum by e-mail.
- Members' news: Notified of consultation using the weekly e-newsletter on the 4th November 2022.

2.3 Making Representations

2.3.1 Feedback on the Employment and Skills – Draft SPD was invited as a self-completion comments form. The form contained only one question, which simplified the process for consultees who wished to make general comments on the document, whilst allowing those who referenced specific sections/paragraphs within the document to do so.

2.3.2 The comments form could be completed using our online consultation portal. The portal was advertised by providing a hyperlink in a variety of locations, including on the Council's Additional Planning Guidance webpage, as part of consultation notifications and within other advertisements for the consultation. The portal provided the option of providing comments on the draft SPD, as well as supplementing that response with additional material.

2.3.3 If it was not possible to make comments directly on the consultation portal, responses were also accepted:

- a. By e-mail: responses@dacorum.gov.uk;
- b. By post: Strategic Planning, The Forum, Marlowes, Hemel Hempstead, HP1 1DN.

2.3.4 For those making comments by e-mail or post, a downloadable and editable comments form (see figure 9) was provided on the Additional Planning Guidance web page. This could be completed as an online form and emailed, or printed out and posted as a letter.

2.4 Level of Response

2.4.1 The consultation received a total of sixteen comments from sixteen consultees. Out of these, eight consultees responded to the consultation stating that they had no specific comments to make.

2.4.2 Eight of these responses were made directly within the online platform, and eight were made via e-mail. No responses were received via post.

2.4.3 Detailed analysis of the responses can be viewed in Section 3 of this report, and the full text of all the responses submitted can be viewed in Appendix B.

2.4.4 The following provides a high level summary of the main themes and issues emerging from the comments as a whole alongside the associated officer response, in no particular order of importance.

Theme:

Concern was raised that the Employment and Skills SPD would mostly benefit residents in Hemel Hempstead, when there is a need to promote and deliver employment opportunities across all of the Borough.

Officer Comment:

While most development is chiefly focussed on Hemel Hempstead, that is not to say that only those residents will benefit. The SPD seeks to ring-fence employment and training opportunities for the benefit of residents across all of the Borough residents, it does not seek to restrict this by the location of the development.

Theme:

Points were raised on how the occupation/end-use phase commitment to recruit local people would operate and be enforced.

Officer Comment:

Operational stage outcomes generated by the end user phase are additional to the required activities to deliver the social value target. These will be discretionary, and the Council will liaise with the end-user to support them with their recruitment needs.

Theme:

A number of respondents noted that following planning permission, the construction of the development may be delivered by multiple developers and sub-contractors and they sought clarification on how will the SPD requirement would work or be apportioned in these circumstances.

Officer Comment:

At application, the developer/planning agent will prepare the overarching Social Value Strategy. The social value requirement will then be included within the legal agreement to the planning consent. At commencement, the Council will work with the relevant

developer/contractor to agree the Social Value Delivery Plan that will detail the outcomes that will be generated across the lifetime of the project.

Theme:

It was suggested that more information was needed on both Hemel Garden Communities and the Hertfordshire wide context and strategies that the SPD will support.

Officer Comment:

Further information on relevant strategies, documents and action plans developed by Hemel Garden Communities and Hertfordshire organisations have been added to the SPD.

Theme:

The justification for enforcing the SPD was questioned, with a respondent noting that there is no relevant reference within the national policy and legal framework, the Public Services (Social Value) Act or the Council's local saved policy.

Officer Comment:

The Employment and Skills SPD provides further guidance and clarity with respect to the effectiveness of Policy CS14 Economic Development. Creating social value through planning is an established practice within many local authorities and is consistent with the guidelines of the National Planning Policy Framework, its overarching ambition for achieving sustainable development and meeting local needs, and paragraphs for building a strong, competitive economy.

Theme:

Respondents requested more information on how the SPD will operate, either via an Approved Delivery Partner or other operator, and how the social value forecast will be generated.

Officer Comment:

Detail on the operation and processes to be used by applicants will be published on the Council's website prior to implementation of the SPD.

Theme:

A landowner representation highlighted the potential costs of the SPD measures and the impact this would have on the delivery of other priorities.

Officer Comment:

The SPD seeks to direct measures that the developer would normally expect to undertake to target the Borough's residents', no significant additional financial contributions are expected that would impact viability or delivery of other requirements.

3. Analysis of Responses

- 3.1 The detailed responses below set out the actions that will be taken in response to individual comments, points and issues.
- 3.2 The responses received were individually reviewed and collated within summary tables. Where several members of the wider community gave a similar response, this was summarised and included once within the table. Responses from a specific (statutory), general or other consultee were summarised individually, irrespective of whether similar comments had been received and previously noted. An officer response has been provided against each issue raised. This also identifies where the Employment and Skills SPD has been revised as a result of the consultation comments received.
- 3.3 This is then followed by a list of all the consultees who responded to the consultation stating that they had no comment to make.
- 3.4 Full text of the responses to the consultation can be found in Appendix B of this document.

Question Text: Do you have any comments on the Employment and Skills– Draft SPD?

Comment ID and Consultee Name	Key Points Raised in Representations	Officer Response
Tring Town Council	<ul style="list-style-type: none"> • The opportunities delivered via the SPD should be available to all Borough residents, including Tring, regardless of where the planning application is made. • The policy should also help small local businesses through securing space and offering financial assistance. • The Council’s objectives for economic growth should be balanced with the need to tackle the Climate Change Emergency. • It is disappointing that a Social Value Framework has not yet been developed. • The SPD should be widened to include social and wellbeing objectives. 	<ul style="list-style-type: none"> • The SPD seeks to ring-fence employment and training opportunities for the Borough’s residents, it does not seek to introduce a further restriction that would limit the benefit to a particular location. • These comments are welcomed but are beyond the scope of the Employment and Skills SPD. • These comments are welcomed but are beyond the scope of the Employment and Skills SPD. • Social value projects that could form part of a future framework are being co-ordinated under the Economic Recovery programme and monitored by the Economic Recovery Board. • The SPD focuses on employment and training initiatives, opportunities for delivering on wider social and wellbeing objectives are beyond its scope.

Comment ID and Consultee Name	Key Points Raised in Representations	Officer Response
	<ul style="list-style-type: none"> • Tring has lost employment opportunities through redevelopment for housing. • Clarity is needed on how developer contributions via the 'Employment and Skills Plan' might be achieved, as construction work is carried out by a succession of contractors. • How will the social value obligation be deemed to be discharged. • How many apprenticeships might be generated through the SPD? • How will the occupation phase commitment to recruit local people be enforced? • Who, or what sort of person or organisation is envisaged as being the Approved Delivery Partner? 	<ul style="list-style-type: none"> • The allocation and protection of land for employment uses is outside the scope of the SPD. • The developer and/or main contractor will agree with the Council a Social Value Delivery Plan detailing the range of delivery options that will be implemented. • The LPA will issue a Discharge Notice following submission of a final monitoring report. • This is currently unknown and will be dependent on the nature and scale of future development. The types of opportunities delivered will be recorded annually in the Authority Monitoring Report published by the Council. • Opportunities during the occupation phase will be discretionary, the Council will liaise with the end-user to support them with their recruitment needs. • The Council is aware of a number of organisations who offer these types of

Comment ID and Consultee Name	Key Points Raised in Representations	Officer Response
		<p>services, a decision on how this is taken forward will be made in 2023.</p>
<p>Hemel Garden Communities</p>	<ul style="list-style-type: none"> • A Hertfordshire-wide perspective is needed on growth and opportunity areas, and a comparison with national trends. • Further study on socio-economic (including skills) and demographics will help understand the skills gaps and future trends. • More statistics and evidence required to back up trends. • Further information needed on Hemel Garden Communities – including ambition, opportunity, and a synopsis of the spatial vision document (section 3 page 7). • Sustainability and the Green Economy – how can this tie in with Dacorum’s Climate and Ecological Emergency Strategy (August 2022) and declared climate emergency (2019). 	<ul style="list-style-type: none"> • The document text will be updated to include Hertfordshire wide strategies and plans. Section 4 compares Dacorum district data with Hertfordshire and national figures. • The Herts Local Skills Improvement Plan (LSIP) is under way and will deliver findings in 2023. • The information in section 4 will be updated to reflect the latest issue from NOMIS. • The document text will be updated to reflect this comment through the addition of the text provided on Hemel Garden Communities. • Providing local employment opportunities and promoting local supply chains will reduce travel distances and associated greenhouse gas emissions from transport. The use of sustainable building techniques and promotion of the green economy is outside the scope of the SPD.

Comment ID and Consultee Name	Key Points Raised in Representations	Officer Response
	<ul style="list-style-type: none"> • Opportunity to identify further partners and organisations. • Skills Gaps and change of work trends post-pandemic – planning and health and other trends? • Should trends regarding Creative and Film industries and Life Sciences be mentioned? • Section 3 page 7 Reference county wide or South West Herts ambition in Policy Background e.g. Herts Economic Plan 2017-2030 (2017), Herts Skills and Employment Strategy 2021-2024, South West Herts Economic Study Update (2019). • Section 3.5 page 8. Caveat the ongoing Local Plan Process? Reg 18 / Reference to Local Development scheme (February 2022)? 	<ul style="list-style-type: none"> • The main organisations and partnerships are listed, the Council will provide further contacts relevant to a particular application as required. • Early evidence on the impact of COVID-19 demonstrates more need for the training, employment and work experience measures that the SPD seeks to introduce. • The SPD applies to all employment uses development over the 1000m² threshold including opportunities in the Creative and Film industries and Life Sciences sectors. • The document text will be updated to reflect this comment through the addition of paragraphs on the South West Hertfordshire Economic Studies, the Hertfordshire Strategic Economic Plan 2017-2030, and the Hertfordshire Skills and Employment Strategy 2021-2024. • The document text will be updated to reflect this comment.

Comment ID and Consultee Name	Key Points Raised in Representations	Officer Response
	<ul style="list-style-type: none"> • Section 3.9.3 page 9 More information on Herts IQ, Hemel Garden Communities and Herts LEP. • Section 3.9.5 page 9 Reference Hemel Place, plus transformation projects and town centre opportunities. • Section 3.10 page 10 Explanation or further information required on Herts Local Skills Improvement Plan. • Section 4.1 page 10. Additional county wide information on ambitions, strategies and opportunities needed to feed into justification. • Section 4.10 page 11. Further evidence required around the change of employment sectors post-pandemic and skills gaps. • Section 4.11 page 11 Evidence required to highlight future opportunities of the job market and sectors, such as MedTech, AgriTech, Clean Growth and related job skill gaps and future skills required. 	<ul style="list-style-type: none"> • The text in section 3.9.3 is in line with the Dacorum Economic Recovery Plan's key priorities. • The text in section 3.9.5 is in line with the Dacorum Economic Recovery Plan's key priorities. • The document text will be updated to reflect this comment through the addition of the Herts Local Skills Improvement Plan. • The text in Section 3 will be updated to include the Hertfordshire wide strategies and plans referenced in later comments. Section 4 compares Dacorum district data with Hertfordshire and national figures. • The Herts Local Skills Improvement Plan, due in 2023, will provide further data regarding employment sectors and skills gaps. • The skills and training opportunities delivered will largely relate to those arising from each qualifying development during the construction phase, followed by end-use if applicable.

Comment ID and Consultee Name	Key Points Raised in Representations	Officer Response
	<ul style="list-style-type: none"> Section 4.18 page 11 Identify further partners such as Herts LEP, Herts IQ, Maylands, Rothamsted Research. 	<ul style="list-style-type: none"> The document will be updated to include Herts LEP, which through its programmes and partners covers the other organisations suggested.
Thakeham – Bulbourne Cross	<ul style="list-style-type: none"> A Thakeham scheme at Bulbourne Cross would deliver around 1,100 homes, a primary school and 24-acre site for sports pitches, changing rooms and facilities. The scheme would include a social value delivery plan and would create employment and training opportunities in Berkhamsted and across Dacorum via the use of local supply chains, recruitment of local labour, facilitating apprenticeships and work experience across multiple industry disciplines and the provision of training and upskilling. These initiatives would benefit, in particular, those who are unemployed and disadvantaged or those that are neither in employment, education or training (NEET). Bulbourne Cross would be zero carbon in lifetime use and achieve a 	<ul style="list-style-type: none"> The SPD would require a qualifying development to prepare a Social Value Delivery Plan at commencement for approval by the LPA.

Comment ID and Consultee Name	Key Points Raised in Representations	Officer Response
	<p>minimum biodiversity net gain of 20%, will support significant opportunity for local green job and green job skills development for the community.</p>	
L&Q Estates Ltd	<ul style="list-style-type: none"> • Social Value should be facilitated in a flexible manner to enable the development industry and operators within it to deliver efficiently and effectively, particularly given the urgent need for housing to be built. • The potential financial impact of additional development requirements is also an important consideration, particularly when there can be a number of competing priorities that need to be provided as part of the overall developer contribution. • The role of local Authorities in capturing social and economic benefits from growth is not set out in the national policy and legal framework or Public Services (Social Value) Act. 	<ul style="list-style-type: none"> • The preparation of a Social Value Strategy is important to delivering a number of Council initiatives regarding the development of local skills and knowledge across the borough. The strategy should be reasonably flexible taking account of the scale and nature of proposals being put forward. • The SPD will direct measures that the developer would normally expect to undertake to target the Borough's residents', no significant additional financial contributions are expected that would impact viability or the delivery of other requirements. • The SPD seeks to define how social value can be delivered via development, through opportunities within local planning policy. Creating social value through planning is an established practice within many local authorities and is consistent with the guidelines of the National Planning Policy Framework and its overarching ambition for

Comment ID and Consultee Name	Key Points Raised in Representations	Officer Response
	<ul style="list-style-type: none"> Policy CS14 that is used to underlie the SPD mainly relates to providing land to accommodate growth and a strategy for the direction of that growth. There is no reference to the Council's intention to identify initiatives that will be imposed in the delivery of this policy and others, or prepared SPDs. This should have been made explicit if it was the Council's intention to enable a discussion on whether it meets the tests of soundness in the NPPF. The foundation of the SPD is, therefore, considered to be extremely questionable. 	<p>achieving sustainable development and meeting local needs.</p> <ul style="list-style-type: none"> The Council considers that the existing Policy CS14 offers a sufficient and robust policy framework to support the new SPD. CS14 Economic Development provides the scope for the Council to bring forward initiatives and contribute towards the delivery of the Economic Development Strategy Objectives (Table 4 of the Core Strategy). Paragraph 81 of the NPPF states that 'Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.' A shortage in appropriately skilled construction workforce is one such weakness and challenge. Case examples also demonstrate that training initiatives can be secured from development where there is need, relevant policy documents and economic development team support.

Comment ID and Consultee Name	Key Points Raised in Representations	Officer Response
	<ul style="list-style-type: none"> • Policy CS14 suggests that initiatives are optional, it is presumed that the requirements in this SPD will follow and also remain an option, which will attribute additional weight in the decision making process. In which case, no criticism can be afforded to schemes that do not prepare Social Value Strategy as part of their planning application. This should be clearly set out in the SPD. • Section 4 – economically inactive should remove number related to Covid 19 to show true amount of people that are out of work but are able to participate. • Evidence should show what sectors the young people who have lost their jobs as a result of Covid would like to progress into, upskilling young people is currently being driven by the market without state interventions. • 4.13 the threshold of 30 dwellings should be clarified and justified and delivery should take into account development being delivered by 	<ul style="list-style-type: none"> • Once adopted, the SPD will be a material consideration in the determination of planning applications. It will not carry the same level of weight as an adopted policy of the Core Strategy, however an SPD should build upon and provide more detailed advice and guidance on policies in the adopted Core Strategy, namely in this instance policy CS14 and initiatives that help the local workforce adjust to change and develop their skills. • The number of people within Dacorum who are economically inactive due to issues related to COVID-19 is not available from ONS. • The SPD focuses on the development sector, promoting employment opportunities in other sectors that young people may be interested in is beyond the scope of the document. • The 30 dwelling threshold has been successfully implemented by other local authorities. It sets a practical approach that will capture schemes that can deliver an

Comment ID and Consultee Name	Key Points Raised in Representations	Officer Response
	<p>multiple parties or the site being sold onto a house builder post outline planning consent and how the requirement would work in these scenarios.</p> <ul style="list-style-type: none"> • Further information on the model name, the industry it has been prepared for and the companies that have approved it and the proposed delivery partner should be provided so the implications can be understood. Examples of forecasts should be provided. • 4.17 A master developer or promoter would not be able to deliver the proposal in its entirety. How should it be apportioned on sites where there may be multiple developers. What are the consequences if targets are not achieved. • 4.18 Supporting the integration of the local supply chain may add further challenges to the supply of goods where there are existing issues and will further frustrate the ability to get 	<p>education and training programme, and are more likely to be delivered in locations where education providers and supply chains are located, and not penalise smaller developments.</p> <ul style="list-style-type: none"> • The Council is aware of a number of models developed by organisations such as the Homes and Communities Agency, National Skills Academy for Construction projects and the Construction Industry Training Board. Similarly, there are several organisations who offer delivery partner services, a decision on how this is taken forward will be made in 2023. • The legal agreement is entered into by a person with an interest in the land (be they landowner or developer) and the local planning authority. The important point to note is that such agreements and obligations continue to run with the land, and are legally binding and enforceable. • There is evidence within the construction industry that the use of local supply chains is more sustainable, flexible and cost effective.

Comment ID and Consultee Name	Key Points Raised in Representations	Officer Response
	<p>materials when needed and should be excluded. Plus volume house builders may purchase materials on a national scale to maximise competitive pricing. Higher costs may impact on Dacorum's already higher than national average affordability ratio.</p> <ul style="list-style-type: none"> • Overall there will be financial implications and SPDs should not 'add unnecessarily to the financial burdens on development'. • An operational stage Social Value Strategy for non-residential developments would be particularly onerous and needs more clarity. • Section 5, more clarity is needed on how the third party delivery partner will be funded. • As the policy basis suggests that the Social Value Strategy 'initiatives' 	<ul style="list-style-type: none"> • The measures delivered via the SPD are likely to reduce recruitment costs, aid vacancy filling and overall help to improve the labour and skills shortage within the construction industry. • Operational stage outcomes generated by the end user phase are additional to the required activities to deliver the social value target. These will be discretionary, and the Council will liaise with the end-user to support them with their recruitment needs. • Section 5.6 explains that a financial contribution to enable the Approved Delivery Partner to deliver their end-to-end service will be collected via Section 106 agreements. • There are many examples across the country where the preparation of such

Comment ID and Consultee Name	Key Points Raised in Representations	Officer Response
	<p>would be optional, as a result it is questionable as to whether providing for the requirements in the Social Value forecast are necessary to make the development acceptable in planning terms. Further clarity is required in relation to criteria b and c of paragraph 57, this will depend on what is requested and on a site by site basis.</p>	<p>strategies has been enshrined through a mixture of specific Local Plan policies or Supplementary Planning Documents. Policy CS14 sets a requirement for “initiatives that help the local workforce adjust to change and develop their skills will be supported”. Therefore the request to have a Social Value Strategy is not an additional burden on development given that the policy already supports such initiatives. The Employment and Skills SPD provides further guidance and clarity with respect to the effectiveness of this part of Policy CS14.</p>
Wider Community	<ul style="list-style-type: none"> • Schools should focus more on vocational courses in practical work-based skills, for pupils aged 14 years onwards. • This should include work experience for students aged 14-15 years to encourage them to be part of the future work force. • The Council should promote other types of employment and not just the building industry as shown in the images used to illustrate the SPD. 	<ul style="list-style-type: none"> • The SPD encourages developers to work with education providers to actively promote careers in development and construction. • The SPD encourages Social Value Strategies to include work experience and work placements for students from the age of 14 years. • The SPD seeks to secure employment and training opportunities during the construction phase of buildings, such as directly on-site or via the local supply chain. The Economic Development Service engages with local businesses and training providers and

Comment ID and Consultee Name	Key Points Raised in Representations	Officer Response
	<ul style="list-style-type: none"> • More attention should be given to providing employment opportunities in towns and areas outside Hemel Hempstead. • Developers of large residential schemes should be made to include some element of commercial development. • Developers should also be made to fund public transport to towns and areas of employment. • Article 4 Directives should be used in key areas such as Maylands Avenue and the town centre, to prevent the loss of retail shops and employment land. • More is needed to stop the decline in shops and increase footfall such as by introducing periods of free parking. 	<p>recruiters across all sectors and employment types.</p> <ul style="list-style-type: none"> • The SPD seeks to ring-fence employment and training opportunities for the benefit of all of the Borough's residents, it does not seek to introduce a further restriction based on the location of the development. • The allocation of sites and associated land uses is outside the scope of the SPD. • The requirements for developer contributions towards public transport is outside the scope of the SPD. • The use of Article 4 Directives is outside of the scope of the SPD. • Initiatives to encourage footfall to shopping areas and car park charges are outside the scope of the SPD. The Economic Development Service delivers events,

Comment ID and Consultee Name	Key Points Raised in Representations	Officer Response
	<ul style="list-style-type: none"> • More small scale start-up premises, manufacturing and other types of employment uses (including those considered 'dirty' or noisy) should be encouraged to broaden the range of jobs available. • More is needed to bring residents who are economically inactive and those without qualifications into employment. • Schools should improve career education, with pathways to apprenticeships and work based qualifications. 	<p>activity trails and loyalty promotions to drive footfall into our towns.</p> <ul style="list-style-type: none"> • The size and mix of businesses within allocated employment sites is outside the scope of the SPD. • The measures delivered via the SPD will help bring economically inactive residents and those without qualifications into employment, to include targeting young people not in education or employment. • Social Value Strategies will be expected to include measures such as liaising with education providers, participation in education initiatives, and promotion of careers in the development industry, alongside the provision of traineeships and apprenticeships.

There were a number of responses from statutory consultees confirming that they had no specific comments to make on the content of the draft SPD. These consultees are:

1. The Environment Agency
2. Historic England
3. Natural England
4. The British Pipeline Agency
5. Hertfordshire County Council: Minerals and Waste
6. Hertfordshire County Council: Property
7. The Canal and River Trust
8. Transport for London

4. Next Steps

- 4.1 This Consultation Report, alongside the final version of the Employment and Skills SPD will be reported to the Council's Overview and Scrutiny Committee for Strategic Planning and the Environment and the Council's Cabinet for recommendations, before progressing to Full Council for approval to adopt.
- 4.2 The adoption procedure will be completed in accordance with Regulation 14 of the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012, and the Council's Statement of Community Involvement (adopted 2019).
- 4.3 Once adopted, the Employment and Skills SPD will be a material consideration in determining planning applications.

Appendix A: Supporting Information

Digital

Figure 1: Consultation Portal

The screenshot shows the 'Dacorum Consultation Home' page for 'Employment and Skills - Draft SPD'. The page is titled 'INFORMAL SUBMISSION - CLOSED' and provides information about the consultation process. It includes a 'SURVEY DETAILS' tab, a 'WHAT PEOPLE SAY' section, and a 'Supporting Files' section. The 'Supporting Files' section contains a link to 'Employment and Skills - Draft SPD.pdf'. The 'Recent Comments' section lists comments from 'LQ Estates Ltd', 'Issy Spence', 'Anna Barnard', and 'Becki Ingram'. The 'What is the Employment and Skills - Draft SPD?' section explains the purpose of the SPD and provides contact information for Dacorum Borough Council. The 'How do I comment using the Consultation Portal?' section provides instructions on how to comment and attach files.

Dacorum Consultation Home

Employment and Skills - Draft SPD

INFORMAL SUBMISSION - CLOSED

Consultation on the new Employment and Skills - Draft SPD.

SURVEY DETAILS | WHAT PEOPLE SAY

More Information

Strategic Planning & Regeneration

Dacorum Borough Council

01442 228660

strategic.planning@dacorum.gov.uk

The Forum Marlowes Hemel Hempstead Herts HP1 1DN

Supporting Files

[Employment and Skills - Draft SPD.pdf](#)

Recent Comments

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[Anna Barnard](#)

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See [What People Say](#)

PRIVACY POLICY

Please note that your name and comments will be made publicly viewable as timely as is practicable once they have been checked for any potential offensive content and therefore cannot be treated as confidential.

PLEASE READ BEFORE STARTING THIS CONSULTATION

What is the Employment and Skills - Draft SPD?

The Employment and Skills - Draft SPD is a new tool that will enable the Council to ring-fence opportunities arising from development to benefit Dacorum's residents, thereby generating additional social value. The SPD aims to increase local employment opportunities, help businesses to find suitable local staff and suppliers, improve the skills of local people, support businesses already located in Dacorum to grow and to attract new businesses into the area. Once adopted, this SPD will be a material consideration in determining planning applications.

The consultation starts at 12pm on Friday 28th October 2022 and closes at 11:59pm on Monday 28th November 2022. **Only responses received during these times can be accepted.**

To view the document: please refer to the "Supporting Files" tab, there you will be able to see the Employment and Skills SPD as a PDF.

How do I comment using the Consultation Portal?

To make comments you will be asked to sign in or register. (Please see "" & "" notes below)

To have your say, please click on the **START** button. This will take you to the form where you can leave your comments. You can also attach files to your comments by selecting "Drop a file here or browse".

Underneath the comments form you will see three options: "SAVE AND REVIEW", "SAVE AS DRAFT" and "DISCARD".

To complete your response select "SAVE AND REVIEW".

Once you have selected this option - at the top right of the document page you will see "REVIEW" and "SUBMIT" buttons. REVIEW allows you to review the comments you have currently saved, once you are satisfied please select SUBMIT.

Your responses are not received until you have SUBMITTED them.

Notification

Figure 2: Email Notification from Objective

Email subject:
Dacorum Borough Council: New Consultation on the Employment and Skills - Draft SPD Consultation

Email body:

Dear **USER NAME**

NEW CONSULTATION ON THE EMPLOYMENT AND SKILLS - DRAFT SUPPLEMENTARY PLANNING DOCUMENT.

What is this consultation about?

The Employment and Skills - Draft SPD is a new tool that will enable the Council to ring-fence opportunities arising from development to benefit Dacorum's residents, thereby generating additional social value. The SPD aims to increase local employment opportunities, help businesses to find suitable local staff and suppliers, improve the skills of local people, support businesses already located in Dacorum to grow and attract new businesses into the area. Once adopted the SPD will be a material consideration in determining planning applications.

How can I have my say?

You can make your comments to the Employment and Skills - Draft SPD between the following dates:

IF: EVENT START DATE <<EXISTS>> Start Date: **EVENT START DATE**

IF: EVENT END DATE <<EXISTS>> End Date: **EVENT END DATE**

Please click here to make your comments on our consultation portal: [Employment and Skills - Draft SPD Consultation Survey](#)

- If you have forgotten your **password** please [follow this link](#).
- If you have forgotten your **username** please [follow this link](#).

Please note that comments received cannot be treated as confidential and will be available to view publicly. However, published comments will exclude your personal contact details and include only your name.

Where can I find more information?

All information and documents relating to both consultations are available online:

- via the Council's [consultation portal](#).
- on the Council's [website](#).

Hard copies of the documents are viewable:

- at public libraries within the borough ([during normal opening hours](#)); and
- at Borough Council offices ([during normal opening hours](#)).

It is also possible to purchase hard copies of documents, please email strategic_planning@dacorum.gov.uk for more information.

Please do not reply to this email. If you have any questions or require further information please contact the Strategic Planning and Regeneration team:

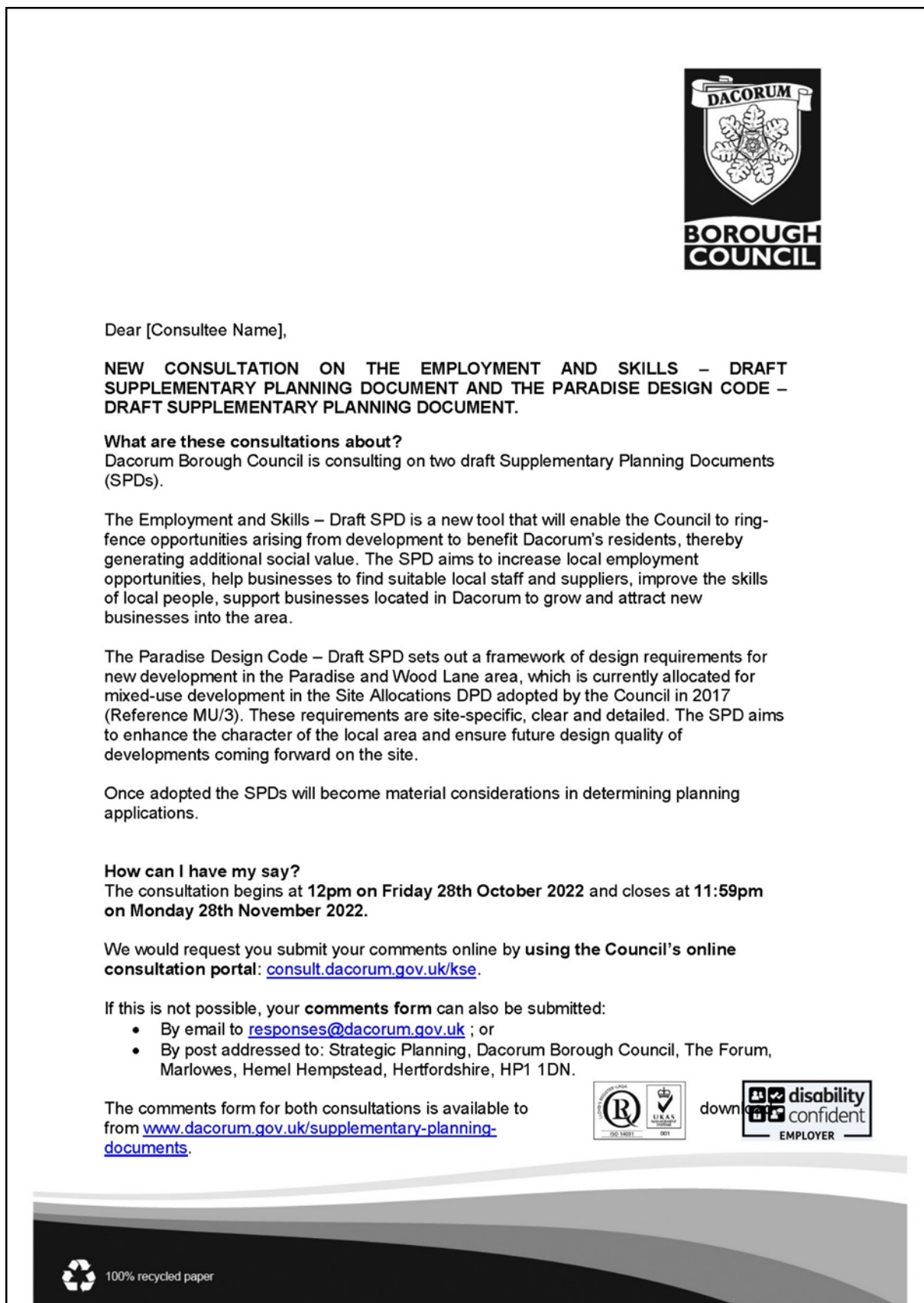
Email: strategic_planning@dacorum.gov.uk
Phone: 01442 228660

Yours sincerely,

Alex Robinson
Assistant Director for Planning
Dacorum Borough Council

Please [click here](#) if you wish to amend your user details or unsubscribe from receiving notifications about Dacorum Borough Council planning consultations.

Figure 3: Notification Letter sent by Post.



Please note that comments received cannot be treated as confidential and will be available to view publicly. However, published comments will exclude your personal contact details and include only your name.

Where can I find more information?

All information and documents relating to both consultations are available online:

- via the Council's consultation portal: consult.dacorum.gov.uk/kse
- On the Council's website: www.dacorum.gov.uk/supplementary-planning-documents.

Hard copies of the documents are viewable:

- at public libraries within the Borough (during normal opening hours): www.hertfordshire.gov.uk/services/libraries-and-archives/library-opening-hours/library-opening-hours-and-locations.aspx ; and
- at Borough Council offices (during normal opening hours) www.dacorum.gov.uk/home/do-it-online/contact-us

Please contact the Strategic Planning and Regeneration team if you have any questions or require further information:

Email: strategic.planning@dacorum.gov.uk
Phone: 01442 228660

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Alex Robinson', with a stylized flourish at the end.

Alex Robinson
Assistant Director for Planning
Dacorum Borough Council

Figure 4: Notification sent to Town and Parish Councils in the Borough. Please note the small amendment to the text of the original notification in order to reflect that hard copies of documents were made available to Town and Parish Councils without cost, in order for these to be held as reference copies.

Sent: 28 October 2022 10:47
Subject: Dacorum Borough Council: New SPD Consultations available

Dear Town Clerk/Parish Clerk,

NEW CONSULTATION ON THE EMPLOYMENT AND SKILLS – DRAFT SUPPLEMENTARY PLANNING DOCUMENT AND THE PARADISE DESIGN CODE – DRAFT SUPPLEMENTARY PLANNING DOCUMENT.

What are these consultations about?
Dacorum Borough Council is consulting on two draft Supplementary Planning Documents (SPDs).

The Employment and Skills – Draft SPD is a new tool that will enable the Council to ring-fence opportunities arising from development to benefit Dacorum’s residents, thereby generating additional social value. The SPD aims to increase local employment opportunities, help businesses to find suitable local staff and suppliers, improve the skills of local people, support businesses located in Dacorum to grow and attract new businesses into the area.

The Paradise Design Code – Draft SPD sets out a framework of design requirements for new development in the Paradise and Wood Lane area, which is currently allocated for mixed-use development in the Site Allocations DPD adopted by the Council in 2017 (Reference MU/3). These requirements are site-specific, clear and detailed. The SPD aims to enhance the character of the local area and ensure future design quality of developments coming forward on the site.

Once adopted the SPDs will become material considerations in determining planning applications.

How can I have my say?
The consultation begins at **12pm on Friday 28th October 2022** and closes at **11:59pm on Monday 28th November 2022**.

We would request you submit your comments online by **using the Council’s online consultation portal:** consult.dacorum.gov.uk/kse.

If this is not possible, your **comments form** can also be submitted:

- By email to responses@dacorum.gov.uk ; or
- By post addressed to: Strategic Planning, Dacorum Borough Council, The Forum, Marlowes, Hemel Hempstead, Hertfordshire, HP1 1DN.

The comments form for both consultations is available to download from www.dacorum.gov.uk/supplementary-planning-documents.

Please note that comments received cannot be treated as confidential and will be available to view publicly. However, published comments will exclude your personal contact details and include only your name.

Where can I find more information?
All information and documents relating to both consultations are available online:

- via the Council’s consultation portal: consult.dacorum.gov.uk/kse
- On the Council’s website: www.dacorum.gov.uk/supplementary-planning-documents.


Hard copies of the documents are viewable:

- at public libraries within the Borough (during normal opening hours): www.hertfordshire.gov.uk/services/libraries-and-archives/library-opening-hours/library-opening-hours-and-locations.aspx ; and
- at Borough Council offices (during normal opening hours) www.dacorum.gov.uk/home/do-it-online/contact-us

Hard copies of the consultation documents are available to be sent to all Town and Parish Councils in the Borough to be held as reference copies. Please email strategic.planning@dacorum.gov.uk for more information.

Please contact the Strategic Planning and Regeneration team if you have any questions or require further information:
Email: strategic.planning@dacorum.gov.uk
Phone: 01442 228660

Yours sincerely,



Alex Robinson
Assistant Director for Planning
Dacorum Borough Council

Public Notice

Figure 5: Front Page of Hemel Hempstead Gazette & Express, 26/10/2022

Gazette & Express

hemeltoday.co.uk Visit us online, for breaking news

Serving Hemel Hempstead, Berkhamsted & Tring since 1858

Wednesday, October 26, 2022 £1.30



The top local music, theatre and more

Page 31



Six pages of puzzles

From page 24

Tax rises on cards



COUNCIL TAX BILL 2022/23

- Dacorum people face hike in bid to save council £3.6million over next four years
- Council tax is now expected to go up by 'maximum permissible amount'

FULL STORY: PAGE 6

News



Police officer jailed for crimes including child rape

PAGE 5

News



Berkhamsted best place to live in Herts

PAGE 7

Try our **Squirrel-Buster** feeder range

SAVE £5.00!

SAVE MONEY BY WASTING LESS SEED!

We know that the perfect feeder can make all the difference. Our range of Squirrel Buster rust-proof feeders are 100% ethical and effective. The squirrel's weight shuts off the feeder ports, blocking access to food.

Seed: £40 now £35
Peanuts: £65 now £60
+ £4 P&P for orders under £45

Reader Offer

3 Easy Ways to Order!

Quote code FEEDER

0330 133 4726

nokular.com/feeder OR post a cheque

Figure 7: Public Notice on the Hemel Today online news, published 26th October 2022. The full text of the notice is viewable on the public notices web page.

Hemel Today News you can trust since 1858
Brought to you by The Gazette

News Sport What's On Submit Your Story Lifestyle Berkhamsted News Public Notices Advertise My Business Free Happy Ads

PUBLIC NOTICES HOME SIGN IN OR SIGN UP

Roadworks, planning applications, licensing applications brought to you by the Hemel Today

Search by town, postcode

SEARCH ADVANCED

Map include notices published in the last 30 days

This notice is provided in accordance with Regulations 12 and 13 of the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012

NOTICE DETAILS MAP STREET VIEW

This notice is provided in accordance with Regulations 12 and 13 of the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012

What are the consultations about?

Dacorum Borough Council is consulting on two draft Supplementary Planning Documents (SPDs):

The Employment and Skills – Draft SPD is a new tool that will enable the Council to ring-fence opportunities arising from a development to benefit the Dacorum's residents, thereby generating additional social value. The SPD aims to increase local employment opportunities, help businesses to find suitable local staff and suppliers, improve the skills of local people, to support businesses already located in Dacorum to grow and to attract new businesses into the area.

The Paradise Design Code – Draft SPD sets out a framework of design requirements for new development in the Paradise and Wood Lane area, which is currently allocated for mixed-use development in the Site Allocations DPD adopted by the Council on the 12th July 2017 (Reference MU3). These requirements are site-specific, clear and detailed. The SPD aims to enhance the character of the local area and ensure future design quality of developments coming forward on the site. Once adopted the SPDs will be material considerations in determining planning applications.

- Voice your concerns**
 - Write to your local MP or councillor
- Find out more**
 - Make Freedom of Information request
- Notify council of problem**
 - Get it fixed : report it to council

Publications

Figure 8: 'Dacorum Life' Digital Newsletter Article.



Have your say on our new Draft Employment and Skills SPD

In Dacorum, there's real opportunity for new developments to contribute towards delivering skills and employment prospects, directly benefitting residents and the economy. We would like your views on our new Employment and Skills Draft Supplementary Planning Document. Closing date is Monday 28 November.

[Take part in the consultation](#)

Appendix B: Full Text of Responses

See the next page for the full text of all comments made. Alternatively, you can view all responses made on the consultation webpage, by visiting our consultation portal³.

³ <https://consult.dacorum.gov.uk/kse/event/37167>

Appendix B: Full Text of Responses

Consultee Name	mrs jenny McEntee
Consultee Organisation Details	
Agent Name	
Agent Organisation Details	
ID	EAS1
Subject	
Include files	
ESG question - Please provide your comments here:	<p>3.8 onwards</p> <p>I think this is an interesting document. Education and opportunities are the key. Secondary schools are focusing on GCSE and A level results these are their focus due to Government and OFSTED pressures. BUT a strong emphasis needs to be placed on vocational courses in more practical skills that relate to work. ICT Skills, engineering skills, building skills e.g. bricklaying, plumbing, etc. Learning Cooking Skills, leading to career in catering, metal work, woodwork, Textiles sewing, designing etc. etc. Practical maths related to real life situations etc etc. Art skills, drawing and designing. Although there are college courses doing this at 16 + these courses could start at 14 in school. ICT courses that are up to date in school and taught in a relevant way to young people.</p> <p>More practical subjects taught in school from age 14 onwards would make school feel more relevant to pupils who are less academic. These pupils need to be up skilled so that they can get good well paid jobs in the future. They could be future engineers, mechanics, builders. Encouraging entrepreneur skills and work experience in relevant jobs. More work experience for pupils when they are 14 / 15 year olds to encourage them to be part of the future work force. So often now pupils have to arrange their own work experience and they might not know anyone who works in these fields that they are interested in.</p> <p>Pupils get turned off by school if they feel it is not relevant to their lives.</p>

File Question - Please upload any supporting evidence here:	
Consultee Name	Paul Orchard-Lisle
Consultee Organisation Details	
Agent Name	
Agent Organisation Details	
ID	EAS2
Subject	
Include files	
ESG question - Please provide your comments here:	<p>I support the plan, but urge</p> <p>1 employing dedicted staff who will WELCOME NEW EMPOLYERS and be able to reassure them that Dacorum is a place to do business; access to markets/security/quality of labour force etc</p> <p>2 Dacorum should offer emplyers a GUIDE TO GOOD PRACTICE - a checklist of how to get the most our of the Borough and how to increase productivity by being good employers</p>
File Question - Please upload any supporting evidence here:	
Consultee Name	Hertfordshire County Council Property
Consultee Organisation Details	Property Team
Agent Name	
Agent Organisation Details	
ID	EAS3
Subject	
Include files	
ESG question - Please provide your comments here:	The Property Planning Team on behalf of Hertfordshire County Council as a landowner has no comments to make on the Employment and Skills draft DPD.

File Question - Please upload any supporting evidence here:	
Consultee Name	Danielle West
Consultee Organisation Details	
Agent Name	
Agent Organisation Details	
ID	EAS4
Subject	
Include files	LOUISE WALK PLAN - POTENTIAL LAYOUT.docx
ESG question - Please provide your comments here:	<p><u>RESPONSE TO THE EMPLOYMENT AND SKILLS PLANNING SPD</u></p> <p>HOW THE PROPOSED DEVELOPMENT AT FOX MEADOW, LOUISE WALK, BOVINGDON CAN IMPROVE THE SKILLS OF LOCAL PEOPLE, SUPPORT BUSINESSES ALREADY LOCATED IN DACORUM TO GROW AND TO ATTRACT NEW BUSINESSES INTO THE AREA.</p> <p>Proposal:</p> <p>To build 50 carbon net-zero homes, a Scout Hall and provide a Junior Football Pitch for Bovingdon Football Club.</p> <p>The site comprises a total of 2.5 hectares of Greenbelt Land (Land Registry HD402884) and an access road named Louise Walk, located off Green Lane Bovingdon (Land Registry HD375147). The site is wholly controlled by one land owner. A plan of the proposal is attached.</p> <p>Due to the size of the proposed development, it meets the requirement for a Social Value Strategy (Page 12 - Use Class C3). The development proposal at Louise Walk will provide Social Value by delivering much-needed community assets on-site. It is this approach which sets Louise Walk apart from other sites in Bovingdon.</p> <p>Community issues specific to Bovingdon:</p> <p>There is no Scout Hall in Bovingdon, since the original one was condemned in 2016.</p>

There is no dedicated indoor meeting place for youth in Bovingdon. Anti-social behaviour is one of the most commonly reported crimes in the Village (39 recorded incidents between September 2021 to August 2022 – UKcrimestats.com – Bovingdon Civil Parish).

There are very limited indoor spaces for local enterprises / clubs to meet and run sessions.

The Under 14s football teams do not have their own pitch and as a result will often have to travel to Hemel Hempstead for matches.

How Land at Fox Meadow will provide Social Value, specifically in terms of Employment and Skills

Long-term sustainable economic growth within Dacorum will only be achieved with attractive living spaces, embedded within a well-developed, sustainable and modern infrastructure. Better standards of living through educational, sporting and employment opportunities, start at grass roots level. The Council's aspirations for Dacorum apply to all aspects of the Socio-economic structure, in conjunction with the built and natural environment.

The proposal for land at Louise Walk compliments DBC's goals for delivering Social Value on a variety of levels:

- 1 The provision of a multi-purpose Scout Hall will benefit current and future generations of children, with exciting learning experiences and activities** (Page 8 "Giving local people the opportunity and responsibility to develop new and existing skills"). The Scouts' extra-curricular activities and Duke of Edinburgh Award Scheme work hand in hand with formal education to enhance the lives of young people from the age of 4 upwards. The skills and leadership training provided will, in many cases, endure throughout adulthood, creating opportunities in the workplace. As a community-based charity, the Scouts represent an invaluable asset to Bovingdon (Page 17 - Appendix 1 - Delivery Options - Community Based Projects). The Louise Walk proposal for a Scout Hall represents a much-needed part of the community fabric. It will not only provide the Scouts with a place to call their own, but it will also provide an enduring means by which to generate revenue through giving other local business initiatives a place to operate (Page 13 - 4.18 "Provision

of opportunities for social enterprises, which have explicit social, economic or environmental aims" and "Participation in the promotion of education initiatives, supporting the transition between school and work").

- 1 **As part of the Social Value approach, the proposal includes installation of a football pitch in the southern part of the site.** This pitch will provide the junior teams with their own ground on which to train and play matches. Again, Bovingdon Football Club is an essential part of the community fabric, providing an outlet for people to work in teams and stay healthy. Economic growth and prosperity literally start at the grass roots. The pitch will maintain the current green character of this part of the site, facilitating a strong greenbelt boundary and preserving the rural feel. It will not only provide Bovingdon with another needed community asset, but will also enhance the attractiveness of the proposed residential area. (Page 2 - Section 1.2 and Page 4 - Section 2.1 NPPF: "supporting strong, vibrant and healthy communities and protecting and enhancing the environment")

- 1 **The development aims to provide 50 carbon net-zero homes,** offering a range of housing types, with emphasis on the family but also including enhancements for the elderly and disabled. The proposal takes into consideration that by 2030, one in five people in the UK will be ages 65 or over (Office of National Statistics, 2017). The homes will be built using environmentally sustainable methods and materials, utilising solar panels, grey-water recycling and ground-source heating in order to reduce future carbon footprint. The development will also benefit from the installation of modern infrastructure such as fibre optic broadband, facilitating work-from-home. By providing attractive homes which meet modern expectations of build-quality and sustainability, the residential development will not only retain but also attract new skills and talent to the village and Borough as a whole. (Page 4 - Section 2.2 "82. Planning policies should: c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and d) be flexible enough to accommodate needs

	not anticipated in the plan, allow for new and flexible working practices such as live-work accommodation").
File Question - Please upload any supporting evidence here:	6095818
Consultee Name	Anne Denby
Consultee Organisation Details	Area Planner Canal & River Trust
Agent Name	
Agent Organisation Details	
ID	EAS5
Subject	
Include files	
ESG question - Please provide your comments here:	Thank you for your consultation on the Employment and Skills Draft Supplementary Planning Document. Having reviewed the document, the Trust have no comments to make on the SPD.
File Question - Please upload any supporting evidence here:	
Consultee Name	Natural England
Consultee Organisation Details	Consultations Team Natural England
Agent Name	
Agent Organisation Details	
ID	EAS7
Subject	
Include files	
ESG question - Please provide your comments here:	Employment & Skills Draft Supplementary Planning Document (SPD) Thank you for your consultation on the above dated 28 October 2022, which was received by Natural England on 28 October 2022.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature.

Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment.

Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.

Strategic Environmental Assessment/Habitats Regulations Assessment

A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here <https://www.gov.uk/guidance/strategic-environmental-assessments-and-habitats-regulations-assessments>. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.

Please send all planning consultations electronically to the consultation hub at consultations@naturalengland.org.uk.

File Question - Please upload any supporting evidence here:

Consultee Name

Richard Carr

Consultee Organisation Details

TFL Planning Team
Transport For London

Agent Name

Agent Organisation Details

ID

EAS8

Subject	
Include files	
ESG question - Please provide your comments here:	Thank you for consulting Transport for London (TfL). I can confirm that we have no comments to make on the draft SPD
File Question - Please upload any supporting evidence here:	
Consultee Name	Land Department
Consultee Organisation Details	British Pipelines Agency
Agent Name	
Agent Organisation Details	
ID	EAS9
Subject	
Include files	
ESG question - Please provide your comments here:	<p>Thank you for your Correspondence Reference New Consultation on the Employment and Skills - Draft SPD Consultation.</p> <p>BPA Have no comment to make on this draft consultation.</p> <p>Please be aware BPA operate High Pressure Under Ground Fuel Pipelines in the Dacorum Area. BPA's interest is only relevant on any intrusive works within the easement of this pipeline.</p> <p>BPA regularly monitor the pipelines and we ask that the following procedures are observed:</p> <ul style="list-style-type: none"> • Before any work (including hand trial holes) starts in the vicinity, a BPA Technician must locate and mark the pipeline(s) on site. • All works within 6m of the pipeline require prior approval by BPA and a BPA Technician must supervise all works within 6m of the pipeline(s). The technician will determine whether a written method statement is necessary before any works proceed. • Heavy vehicle crossing points to be approved before use across the easement. • Any works involving the exposure of the pipeline/s requires a continuous site presence until backfilled (this may mean a security arrangement out of hours).

	<p>When planning works which involve crossing or working within the easement of the pipeline, the following will be requested before works can start:</p> <ul style="list-style-type: none"> • A confirmed or proposed programmed start date for the works • A detailed description of the proposed works • A plan of the work area • Drawings and a method statement for the written approval of BPA.
File Question - Please upload any supporting evidence here:	
Consultee Name	Billal Qureshi
Consultee Organisation Details	Planning Officer, Minerals & Waste Policy, E&I Hertfordshire County Council
Agent Name	
Agent Organisation Details	
ID	EAS10
Subject	
Include files	
ESG question - Please provide your comments here:	Thank you for consulting us on the Employment And Skills - Draft Supplementary Planning Document. We have no comments to make as Minerals and Waste Planning Authority.
File Question - Please upload any supporting evidence here:	
Consultee Name	Andrew Marsh
Consultee Organisation Details	Historic England
Agent Name	
Agent Organisation Details	
ID	EAS11
Subject	
Include files	

ESG question - Please provide your comments here:	RE: New Consultation on the Employment and Skills - Draft SPD Consultation. Thank you for consulting us on the Council's Draft Environment and Skills Supplementary Planning Document, October 2022. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process, and therefore welcome the opportunity to comment on this document. I can confirm that while we do not have any specific comments to make at this stage, we will be interested in receiving subsequent consultations on this and related documents. I would be grateful if you would confirm receipt of this email.
File Question - Please upload any supporting evidence here:	
Consultee Name	Lydia Housden
Consultee Organisation Details	Town Clerk Tring Town Council
Agent Name	Lydia Housden
Agent Organisation Details	
ID	EAS12
Subject	
Include files	
ESG question - Please provide your comments here:	Tring Town Council has had the opportunity to review the draft supplementary planning document on employment and skills and has the following observations to make: Although the Council supports the principle of the document, in particular, the requirement to carry out targeted recruitment, create apprenticeships, work placements and work alongside local schools the document does appear to be geared more towards the larger towns i.e. Hemel Hempstead with Tring only being referred to once. It is important that these opportunities are offered to all Dacorum Borough Council residents including Tring and perhaps this could be encouraged by ensuring that applicants are required to target all

nearby areas including the smaller towns and villages regardless of where the planning application is made.

In our opinion, the policy should also aim at securing space and offering financial assistance to small local businesses that could then offer employment in the area and in many instances give the opportunity for new unique skills to be taught.

DBC aspires to see additional benefits – known as **Social Values** - incorporated into the delivery of **housing and other types of development**.

It states that Social Value is “**the additional economic, social and environmental benefits that can be created as part of that development**”.

In the Foreword of the Corporate Plan 2020-25, DBC re-affirms its acknowledgement in 2019 that we face a Climate Change Emergency. It declares that this recognition of the Emergency will be a key consideration in the delivery of each of its key objectives.

However if we are to take the Climate Change Emergency seriously we need to modify some of those objectives. The UK, and the world in general, is still emitting far too much carbon dioxide and is still using up irreplaceable scarce materials at an alarming and unsustainable rate. Perhaps it's no longer appropriate to plan for economic growth? The UK economy is now contracting and a more realistic objective might be to stabilise the size of our economy at the present level by focussing on increasing productivity, including recycling of all sorts, to conserve raw materials and improve security of supply.

The advice from the NPPF, especially in para 8 (a) as quoted and in Section 6, para 81 is now looking like philosophy from a by-gone age and the exhortation to provide land in advance in order to facilitate antecedent growth targets – reflected in DBC's Policy CS14 - appearing particularly obnoxious. Moreover, the oft-repeated reference to potential British global leadership that also features here, no doubt to encourage us by titillating our vanity, simply undermines what might once have been a legitimate aspiration by now appearing ill-informed and unrealistic.

Within this context, however, it is actually encouraging that this SPD is seeking to secure greater Social Value from developments and perhaps even restore our over-stressed social and health services. The way in which Social Value might be fostered by the use of the 2012 legislation and how it might be extended as a broader concept to enrich society as a whole as well as adding to the social capital of localities is both outward and forward-looking. It is disappointing therefore to read in para 3.13 of the Draft that a Dacorum Social Value Framework is to be used as a tool to support the development of skills and an increase in residents' well-being, has not yet been developed. It might have been useful for councillors to understand better the practicalities of how the SPD is expected to work in ensuring the delivery of these objectives.

There are several areas that need clarification. The developer contributions towards infrastructure via CIL are clear. Similarly, it is clear how specific projects might be financed through S 106. What is not so clear is how developer contributions towards Social Values might be achieved. These are social benefits which, if they arise at all, will arise indirectly and might well be very much contingent on the activities of other agencies, such as public institutions or local authorities. The idea that these might arise directly from a developer's "Employment and Skills Plan" is difficult to visualise, especially as developers tend to be involved locally only during the design and planning processes, with the actual construction work being carried out by contractors. A developer as such would have within their own organisation limited opportunities for the establishment of apprenticeships or other forms of direct training. If it is instead to be the simpler and more practical method of a financial contribution to local schools or FE or HE colleges, then this, one imagines, could indeed be achieved via an S 106 agreement – but the draft document envisages a far more complex and detailed interaction between a transient developer, who is only involved in the short-term, and local colleges and local employers who will need to be involved in the long-term. How and when would the developer's "Social Values obligation" be deemed to be discharged if it is different from a simple

cash transaction at a defined point in the project? There are some incongruities here that need clarification.

In addition there are policy conflicts within the planning system itself that act against the Social Values objectives. In Tring (and across Hertfordshire), due to relaxations in obtaining Change of Use, there has been a steady loss of the smaller, cheaper business/industrial units often used by recently started companies. The Akeman Street/Langdon Street Industrial Estate has now almost completely been redeveloped as housing. This has deprived the town of significant employment opportunities at the same time as increasing the number of residents, thus increasing the pressure of long-distance commutes. Furthermore, the Industrial units planned for on development site LA5 (Roman Park) are being put at risk by challenge to the current planning designation in favour of more housing, which will be difficult for DBC to withstand.

The developers and their building contractors are expected to draw up Social Value Strategies to cover the construction phase of all developments that exceed the set thresholds. Construction phases however tend to have been well prepared in advance and the work then proceeds relatively rapidly using a succession of differently skilled workers, many of whom are present for only part of the process. This limits the scope and duration for on-the-job training, as does the need for security and safety consciousness. Does DBC have any estimates of the number of apprenticeships that might be generated – taking into account that apprenticeships could far exceed in duration of the entire construction phase, depending on the particular skill under consideration?

It is also noted for that for non-residential developments the Social Value Strategy of the first occupant of the premises must include a commitment to giving preference to local people in recruiting staff. How will this be enforced, bearing in mind that the occupant is unlikely to be the developers themselves and no developer is likely to wish to have any obligation placed on the end-user of the premises they have had constructed that might deter uptake?

	And finally, who, or what sort of person or organisation is envisaged as being the Approved Delivery Partner?
File Question - Please upload any supporting evidence here:	
Consultee Name	Kate Howard
Consultee Organisation Details	External Affairs Manager Thakeham
Agent Name	
Agent Organisation Details	
ID	EAS13
Subject	
Include files	
ESG question - Please provide your comments here:	<p>Thakeham is a sustainable, infrastructure-led placemaker with an industry-leading focus on biodiversity and zero carbon community creation.</p> <p>Thakeham is looking to work in partnership with Dacorum Borough Council to deliver a new, sustainable community called Bulbourne Cross at Berkhamsted and Dacorum's Employment & Skills Draft SPD sets out a number of focus areas that are closely linked with the social value and opportunities that Thakeham delivers with the creation of its communities.</p> <p>As a pioneer member of Social Value UK, we understand the positive impact we can have on new and existing communities and will develop a cohesive social value delivery plan that addresses Dacorum's needs in accordance with the Council's wider strategy.</p> <p>A Thakeham scheme at Bulbourne Cross would deliver around 1,100 of the 2,200 new homes needed for Berkhamsted as outlined in the Local Plan, with 40% of these homes being affordable, a primary school and a 24-acre site for the development of sports pitches, changing rooms and facilities, as well as other community benefits.</p> <p>Developing this scheme would also create employment and training opportunities in Berkhamsted and across Dacorum via the use of local supply</p>

chains, recruitment of local labour, facilitating apprenticeships and work experience across multiple industry disciplines and the provision of training and upskilling. These initiatives would benefit, in particular, those who are unemployed and disadvantaged or those that are neither in employment, education or training (NEET).

We are well placed to promote procurement from a local and diverse supply chain for Dacorum projects and our distinctive partnership approach to this allows us to use and support smaller local companies and SMEs which might otherwise find it difficult to access opportunities akin to the scale of our Bulbourne Cross proposal.

Where direct opportunities within our business are limited due to the availability of suitable roles, we will work with our subcontractors to ensure that, through them, there are opportunities for apprenticeships and work experience on our site.

Thakeham also works with Employment Training Plans (ETP) and believes it can make a valuable contribution to this process. We are currently delivering an ETP with Lewes District Council and this formally monitored agreement delivers a range of community jobs and skills benefits including all vacancies, subcontracts and supply sourcing being advertised locally, targeted apprenticeship delivery, work experience for schools and vulnerable adults as well as charitable works.

The construction industry faces significant skills shortages and gender diversity challenges and Thakeham aim to go some way in addressing these social and economic issues via our recruitment processes and award-winning in-house training academy.

In addition, we are proud to support service leavers via the Armed Forces Covenant of which we are Silver Award holders, working with many ex-service personnel.

We are committed to ensuring a skilled and resilient construction sector and are keen to be involved with local careers events and employability skills initiatives in Dacorum. We have previously supported many initiatives, from DWP careers courses and talks to support for job clubs run by local community organisations.

Finally, with reference to Dacorum response to the climate and ecological emergency, our sustainability commitments, which mean that Bulbourne

	<p>Cross would be zero carbon in lifetime use and achieve a minimum biodiversity net gain of 20%, will support significant opportunity for local green job and green job skills development for the community. This will be a key employment and skills growth area for the future and support Decorum's clear focus in this important area.</p> <p>Our approach maximises the wellbeing benefits that our developments offer those who build them, live in them and the communities around them, now and in the future, and we believe that Thakeham and Dacorum Borough Council are clearly aligned in their social value objectives.</p>
File Question - Please upload any supporting evidence here:	
Consultee Name	Becki Ingram
Consultee Organisation Details	Environment Agency
Agent Name	
Agent Organisation Details	
ID	EAS14
Subject	
Include files	
ESG question - Please provide your comments here:	Thank you for consulting us on the Employment and Skills - Draft SPD. I am writing to confirm that we have no comments to make on this document as it falls outside of our remit.
File Question - Please upload any supporting evidence here:	
Consultee Name	Mrs Anna Barnard
Consultee Organisation Details	
Agent Name	
Agent Organisation Details	
ID	EAS15

Subject

Include files

ESG question - Please provide your comments here:

Whilst I am in general agreement with the Strategy, there are comments I wish to make.

Firstly, I would point out that 6 out of the 8 photos in the document relate to the building industry - this is hardly giving the impression that the Council wishes to promote other types of employment! In addition, more attention should be given to providing employment opportunities in towns and areas outside Hemel Hempstead which would reduce vehicular journeys. This should be supplemented by improving public transport. This would help those in lower paid jobs. If you can't afford a car then many people cannot get to work in the first place.

Any large residential development should include some element of commercial development and the developer should be made to provide this on land they own and not rely on CIL money for the Council to find land and build commercial premises. Developers should be made to fund public transport to towns and areas of employment.

The loss of retail shops in town centres should be addressed with the use of Article 4 Directives in certain key areas. This also applies to the loss of employment land eg. Maylands Avenue where land has been diverted to residential. The concentration on provision of very large commercial premises (often which fail to boost employment eg. warehouses, storage facilities) has reduced the number of small premises which encourage start-ups and small businesses. The emphasis on office jobs should be redressed with more small scale manufacturing and uses which could be deemed 'dirty' or 'anti social' re. noise etc. should be encouraged in employment areas to broaden the range of jobs available.

The decline in retail should be addressed by stopping the decline in shops and encouraged an increase in footfall. This will not happen if there are no shops to visit and high parking charges are imposed. (eg. reintroduce free parking on Sundays and Bank Holidays or at least allow 1 hour free eg. as provided in Tring. Too many coffee shops and not enough places to actually buy goods.

It is very important to address the shocking statistics of the economic inactive and those with no qualification. This is an indication of poor education in the

	<p>Borough. To bring people into employment is not only good for the economy but also social behaviour. Improve career education in schools and encourage more apprenticeships and work - not just for written qualifications.</p> <p>Residential development without employment development will make the Borough a poorer place!</p>
File Question - Please upload any supporting evidence here:	
Consultee Name	Issy Spence
Consultee Organisation Details	Design and Planning Officer (SADC) Hemel Garden Communities
Agent Name	
Agent Organisation Details	
ID	EAS16
Subject	
Include files	
ESG question - Please provide your comments here:	<p>General comments and recommendations:</p> <ul style="list-style-type: none"> • Need for Hertfordshire County-wide perspective– Growth, opportunities area. • Further study on socio-economic (including skills) and demographics will help understand the skills gaps and future trends • More statistics and evidence required to back up trends • Further information needed on Hemel Garden Communities– This could include a few lines to explain the ambition, the opportunity and the spatial vision document. • Sustainability and the Green Economy– How this can tie in with Dacorum’s Climate and Ecological Emergency Strategy (August 2022) and declared climate emergency (2019) • Opportunity to identify further partners and organisations • Skills Gaps and change of work trends Post-Pandemic– Planning and Health and other trends? • Ambition of Hemel Garden Communities and the 2019 awarded Garden Town Status - National trends, big ambitions to fulfil, national considerations too

- Should trends regarding **Creative** and **Filmindustries** and **LifeSciences** be mentioned?

Reference

Comment

Recommendation

3.0

Page 7

Each of these Documents has a synopsis, excluding the HGC Spatial Vision - A paragraph on the purpose?

For example:

‘Supported by Garden City Principles, Hemel Garden Communities (HGC) will take the best of the New Town heritage into the 21st century with up to 11,000 homes, 10,000 jobs and Hertfordshire Innovation Quarter at its heart, anchoring the transformation of Hemel Hempstead and the wider area.

The HGC programme area covers the whole town of Hemel Hempstead, within the borough of Dacorum, as well as proposed growth areas straddling both Dacorum and St Albans District to the north and east of the town and wider movement routes beyond.

Dacorum Borough Council, St Albans City and District Council, Hertfordshire County Council, Hertfordshire Local Enterprise Partnership and The Crown Estate are working together to deliver this ambitious development programme which will transform and grow Hemel Hempstead and create attractive, sustainable new neighbourhoods to its north and east by 2050.

The HGC proposal has been recognised by Government, which awarded Hemel Hempstead ‘Garden Town’ status and a grant in 2019 to help develop garden communities of the future.

The Spatial Vision (2021) is a high-level document that provides a series of aspirations for the future of HGC. It is made up of an overarching vision, which is organised into four thematic pillars, all of which reinforce the aspirations to promote healthy lifestyles and respond to the climate crisis.’

A paragraph explaining the HGC Spatial Vision – Pillars and overarching themes and ambitions – Sustainability

3.0

Page 7

Reference county wide or South West Herts ambition in Policy Background
E.g

Herts Economic Plan 2017-2030 (2017)

<https://www.hertfordshirelep.com/media/s3xa5eye/hertfordshire-lep-sep-report-interactive-2017.pdf>

Skills and Employment Strategy 2021-2024

<https://www.hertfordshirelep.com/media/cuygsz/hertfordshire-skills-and-employment-strategy-2021-2024.pdf>

Hatch – South West Economic Study (2019)

<https://www.hertfordshirelep.com/media/s3xa5eye/hatch-south-west-economic-study-2019.pdf>

Add Policy Context from Hertfordshire (HCC)

3.5

Page 8

Caveat the ongoing Local Plan Process? Reg 18 / Reference to Local Development scheme (February 2022)?

Caveat the ongoing Local Plan Process?

3.9.3

Page 9

Mention of Hemel Garden Community and Herts iQ could have more information?

Include Herts LEP?

More information on HertsIQ, HGC and Herts LEP

3.9.5

Page 9

Town Centre opportunities – mention of Hemel Place? Transformation Projects?

Reference Hemel Place

3.10

Page 10

Explanation or further information required on Herts Local Skills Improvement Plan

Explanation or further information required on Herts Local Skills Improvement Plan

4.1

Page 10

Opportunity to relate to County wide growth, Ambitions, Strategies and Opportunities this will provide. More information needed. Statistics needed?

Additional Countywide information, opportunities and strategies to feed into justification.

4.10 Page 11

Post-Covid - The shape of the employment market post Covid – and skills gaps such as Health and Planning professionals

Further evidence required around the change of employment sectors post-pandemic

4.11 Page 11

Expand on future opportunities of the job market and sectors? Such as MedTech, AgriTech, Clean Growth

Evidence required to highlight job skill gaps and future skills required

4.18 Page 11

Identify further partners e.g Herts LEP, Herts iQ, Maylands, Rothamsted

Identify further partners for links with organisations

File Question - Please upload any supporting evidence here:

Consultee Name

LQ Estates Ltd

Consultee Organisation Details	L&Q Estates Ltd
Agent Name	Miss Hanna Mawson
Agent Organisation Details	Pegasus Group
ID	EAS17
Subject	
Include files	PEGASUS GROUP ON BEHALF OF L
ESG question - Please provide your comments here:	See accompanying representations.
File Question - Please upload any supporting evidence here:	6101777