

St Albans City and District Local Plan Examination.

Matter 5 Hearing Statement.

On behalf of Clowes Developments.

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1. Introduction

- 1.1. This Hearing Statement has been prepared by Pegasus Group on behalf of Clowes Developments in response to the Matters, Issues and Questions set out by the Inspectors for the St Albans City and District Local Plan Examination. This statement addresses questions under Matter 5.
- 1.2. Clowes Developments are the freehold owners of land off Noke Lane, Chiswell Green, St Albans. This site is circa 74 hectares and located to the north of the M25, Junction 21a, east of the M1 and west of the North Orbital Road (A405) and wholly within St Alban's Metropolitan Green Belt.
- 1.3. This site is being promoted for development of a new stadium and training facilities for St Albans City FC (including associated training, community access, education and conferencing provision), alongside employment and commercial development, supporting infrastructure and open space, which it is proposed will cross-fund and thereby ensure delivery of the Stadium.
- 1.4. Clowes Developments has engaged in each stage of the preparation of the Local Plan including the Call for Sites, Regulation 18 Consultation in September 2023 and submitted representations to the Regulation 19 consultation in November 2024.

2. Matter 5 – Economy and Employment

Issue 1 – Employment Land Requirement and Allocated Employment Sites

Question 1

Is the Plan's economic strategy based on proportionate and up-to-date evidence?

- 2.1. No, the Plan's economic strategy is not guided by an up to date vision, which in turn should be guided by an up to date evidence base.
- 2.2. Paragraph 86 of NPPF (December 2023) states that:
- Planning policies should (amongst other things):*
- a) *set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration; (emphasis added)*
- 2.3. EMP 06.01 (Hertfordshire Economic Development Strategy 2009–2021) was adopted by the Hertfordshire Works Board in June 2010. It includes a Vision which states that:
- 'By 2021, Hertfordshire will have a resilient and low carbon economy characterised by quality jobs, innovative and dynamic business, supported by a well skilled workforce and an entrepreneurial culture, where everyone has the opportunity to prosper and fulfil their ambitions.' (emphasis added)*
- 2.4. The Council does not appear to have reviewed this Vision notwithstanding the fact that it was developed under very different economic circumstances, and does not, for instance, reflect the challenges and opportunities associated with new digital technologies and economic opportunities identified in the Council's evidence. The Plan's economic strategy is not guided by an up-to-date vision and does not therefore satisfy the requirements in NPPF paragraph 86 (a),

Question 2

Noting the Council's hearing statement for Matter 1, Issue 1, Question 5, should the Plan establish requirements for office, industrial and warehousing provision over the Plan period?

- 2.5. Whilst this would be welcomed, this will not address cross boundary needs for large scale commercial development.

Question 3

Is the Plan positively prepared in respect of setting a strategy and identifying land to meet assessed employment needs?

- 2.6. No, the Plan is not positively prepared as it is not sufficiently flexible enough to accommodate needs not anticipated in the Plan, does not allow rapid responses to change in economic circumstances, and is therefore inconsistent with paragraphs 35 and 86 of the December 2023 NPPF.
- 2.7. Paragraph 86 of NPPF (December 2023) states that:
- Planning policies should (amongst other things):*
- d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.
- 2.8. Paragraph 9.10 and 9.41 to 9.50 of the Southwest Hertfordshire Economic Study (September 2024) (EMP01.01) sets out a range of recommendations in relation to the requirements of priority sectors.
- 2.9. In relation to hyper scale data centres paragraph 9.48 of EMP01.01 states that:
- “the specialist nature of these facilities, together with their role in meeting demand for large scale data storage, back up storage and networking infrastructure which is regional or national means that they should not be seen as contributing to the broader need for industrial, storage and distribution space”.*
- 2.10. Regarding priority sectors, the council’s evidence identifies several constraints associated with the typical plan making approach of developing evidence, selecting and allocating sites and through the preparation, examination and adoption of a Local Plan – a process that may take several years. Maintaining this approach will very likely mean the Council fails to realise any significant benefits from the development of priority sectors, given the dynamic, quick moving nature of the industries and the way that opportunities can be realised.
- 2.11. Strategic Policy SP5 (Employment and the Local Economy) does not respond to the evidence surrounding these priority sectors, therefore it is not positively prepared.
- 2.12. In order to address this, and to ensure that the Plan can be found sound, we have prepared a modification to Policy SP5 through the inclusion of a criterion c, which enables the policy to be flexible enough to accommodate needs not anticipated in the Plan (as required by national policy).

Strategic Policy SP5 - Employment and the Local Economy

The Council will work with stakeholders and local businesses to support economic growth and productivity by maintaining current employment areas and creating new ones such that there is sufficient land and floorspace to cater for full employment and provide for different kinds of employment use. It will seek to intensify land uses where suitable and encourage new businesses and seek inward investment.

*The Council will take the following strategic approach to **the delivery of** employment land:*

- a) *Protected Employment Areas – as set out in Table 5.1 and through Policy EMP1 - will be retained for appropriate business uses. The Council will encourage full use of*

designated employment sites and supports new businesses, business growth, and inward investment.

b) New industrial and business locations will be designated as follows:

- I. 53 ha of Employment land at East Hemel Hempstead (Central) providing for a range of uses including offices, research and development, light industrial and distribution, with 10% of any new development or redevelopment required to contain units for Small Medium Enterprises and expansion / Grow-On units;*
- II. 33.16 ha of the Government permitted Strategic Rail Freight Interchange at the former Radlett aerodrome - mostly B8 distribution/ warehousing.*

c) *Proposals for employment development will be supported, for which there is a demonstrable need, including the need to address the specific locational requirements of different sectors that cannot otherwise be accommodated on protected or allocated sites.*

Due to these locations providing an agreed oversupply for St Albans District's own needs, the excess will assist Dacorum Borough and potentially other South West Herts local authorities in meeting some of their employment requirements. Site allocations for new employment locations are set out on the Policies Map.

Question 4

How did the Council identify land to allocate for employment uses? Was the site selection process robust, justified and proportionate?

2.13. No comment

Question 5

How will the allocated sites at East Hemel Hempstead (Central) and the Radlett Strategic Rail Freight Interchange assist Dacorum and potentially other South West Hertfordshire authorities in meeting some of their employment needs? Is the policy effective?

2.14. No comment

The 2024 South West Hertfordshire Economic Study states that the main barriers to economic growth are the available labour market, with particular reference to an ageing population demographic

Question 6

Taking this into account, are employment and housing requirements suitably aligned, and will the Plan provide sufficient labour to support the employment strategy?

2.15. No comment

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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