

Matter 5 – Economy and Employment

Issue 2 – Protected Employment Areas and Principal Office Locations

Q1 Is the safeguarding of Protected Employment Areas and Principal Office Locations, including the extent of their boundaries, justified? What evidence is there to support Policy EMP1?

Is the safeguarding of Protected Employment Areas and Principal Office Locations, including the extent of their boundaries, justified?

- 1.1 Yes, the Council considers that the safeguarding of Protected Employment Areas and Principal Office Locations, including the extent of their boundaries, is justified and in accordance with NPPF December 2023 paragraph 35b:

*b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- 1.2 These areas are protected for appropriate business uses (use classes B2, B8 and E(g)) to support the Council's strategic approach to employment land and the local economy, as set out in Strategic Policy SP5. Specifically, the safeguarding of Protected Employment Areas and Principal Office Locations will "... support economic growth and productivity..." and ensure "... that there is sufficient land and floorspace to cater for full employment and provide for different kinds of employment use."
- 1.3 It is also considered that the extent of the boundaries of Protected Employment Areas and Principal Office Locations are justified and in accordance with NPPF December 2023 paragraph 35b. The boundaries of designated protected employment areas (as shown on the submitted Policies Map) are appropriate, as they have been tightly drawn to cover the defined areas. In particular, the extent of these area's boundaries comprises land and premises either in existing use for appropriate business uses or land to be allocated for appropriate business uses.
- 1.4 Furthermore, there is good evidence to support the extent of the boundaries of Protected Employment Areas and Principal Office Locations, as shown on the submitted Policies Map. The boundaries of the three Principal Office Locations in St Albans City (PEAs 1-3) are based on recommendations from LCRT 03.01 St Albans City and District Town Centres Boundaries Study (2023) (see section 4.3, pages 114-122).
- 1.5 The boundaries of most of the other Protected Employment Areas (PEAs 4-10, 13-15, 17, 19-20 and 22-26) are based on reviewing and updating the boundaries of existing designated employment areas in the 'saved' policies of the Council's adopted Local Plan, the District Local Plan Review 1994. These are set out in LPCD 15.01 District Local Plan Review 1994 – Saved and Deleted Policies Version (2020) (see Saved Policy 20 Development in Employment Areas), the Proposals Maps and Inset Maps (see LPCD 15.02 to LPCD 15.10). The boundaries of some of these

Protected Employment Areas were subsequently modified, based on the review of the boundaries, to exclude buildings which had changed to residential use following annual monitoring surveys, as set out in LPCD 11.01 Authority's Monitoring Report (2023) (see pages 59-64).

- 1.6 The boundaries of PEAs 12 and 21 are based on the recommendations from site pro-formas in EMP 01.01 South West Herts Economic Study (2024) (see Appendix G, pages 49-52). The boundaries of PEAs 12, 16 and 21 were also based on site boundaries from the 2021 Housing and Economic Land Availability Assessment (HELAA), as set out in HELAA 04.01 Annex 1 Map of all sites (2021).
- 1.7 The boundary of PEA 11 was based on an officer assessment of the employment area, as this site was not previously designated for appropriate business uses in the 'saved' policies of the adopted the District Local Plan Review 1994.

What evidence is there to support Policy EMP1?

- 1.8 There is strong evidence to support Policy EMP1 - Protected Employment Areas. EMP 01.01 (see Appendix G, pages 49-52, and Appendix H, pages 80-86) recommends that most Protected Employment Areas designated in Policy EMP1 (and set out in Table 5.1) should be retained for employment or office uses. A summary of these recommendations is set out in Table 1 below:

Table 1: South West Herts Economic Study (2024) Recommendations for Protected Employment Areas

Site Ref	Employment Area	Location	South West Herts Economic Study (2024) Recommendation
PEA 1	St Albans City Core Principal Office Location	St Albans City	Look to retain significant office role within the City Centre.
PEA 2	St Albans City Station Principal Office Location	St Albans City	Retain for employment uses. Support range of uses around station, including further office uses where possible.
PEA 3	St Albans Abbey Station Principal Office Location	St Albans City	Retain for employment uses.
PEA 4	Porters Wood / Soothouse Spring	St Albans City	Retain for employment uses as providing broad economic function.
PEA 5	Council Depot and adjoining land, St. Albans Road	St Albans City	Retain for employment uses.
PEA 6	Alban Park / Acrewood Way / Lyon Way, Hatfield Road	St Albans City	Retain for employment uses as providing broad economic function.
PEA 7	Brick Knoll Park, Ashley Road	St Albans City	Retain for employment uses.
PEA 8	Executive Park and adjoining land, Hatfield Road	St Albans City	Retain for employment uses.

Site Ref	Employment Area	Location	South West Herts Economic Study (2024) Recommendation
PEA 9	Camp Road / Campfield Road	St Albans City	Deallocate areas converted to residential. Retain remaining areas for employment uses.
PEA 10	North Orbital Commercial Park, Napsbury Lane	St Albans City	Retain for employment uses.
PEA 11	Building Research Establishment, Bricket Wood	Bricket Wood	Retain for employment uses.
PEA 12	Strategic Rail Freight Interchange (new allocation)	Between Frogmore and London Colney	Develop in accordance with planning permissions. Identify as a strategic employment site.
PEA 13	Coldharbour Lane	Harpenden	Retain for employment uses, though monitor. May be pressure for conversions to non-employment uses in medium term.
PEA 14	Batford Mill Industrial Estate	Harpenden	Deallocate for employment.
PEA 15	Southdown Industrial Estate, Southdown Road	Harpenden	Retain for employment uses.
PEA 16	Rothamsted Research (including through expansion allocated in Part B at OS3 and OS4) ¹	Harpenden	Retain for employment uses and retain research specialism.
PEA 17	Redbourn Industrial Park	Redbourn	Retain for employment uses.
PEA 19	Station Road	Wheathampstead	Retain for employment uses, but if alternative employment options are secured in Wheathampstead could allow for other uses on this site.
PEA 20	North of Buncefield	Adjacent to Hemel Hempstead	Retain for employment uses.
PEA 21	East Hemel Hempstead (Central) Enterprise Zone (new allocation)	Adjacent to Hemel Hempstead	Strategic employment site for SW Herts
PEA 22	Wellington Road	London Colney	Retain for employment uses, with adjusted allocation to reflect planning approvals.
PEA 23	The Hertfordshire Business Centre, Alexander Road	London Colney	Retain for employment uses.
PEA 24	Riverside Estate	London Colney	Retain for employment uses.
PEA 25	Watling Street	Frogmore	Redefine allocation boundary to reflect current provision. Retain remaining areas for employment.

¹ Potential expansion of site through allocation in Part B

Q2 As part of the Plan's preparation, was consideration given to whether existing office, industrial or storage and distribution uses could be used for alternative uses, such as housing?

- 2.1 Yes, as part of the Plan's preparation, consideration was given to whether existing office, industrial or storage and distribution uses could be used for alternative uses, such as housing. Evidence for this is primarily set out in EMP 01.01 - South West Herts Economic Study (2024) which addresses and gives recommendations for all of the Protected Employment Areas (PEAs) in the draft Plan at pdf p238-244 (as reproduced in summary form at M5I2Q1 at Table 1 above).
- 2.2 As can be seen, SADC has followed all 20 recommendations of 'Retain' the PEA use in the draft Plan. SADC has also followed the recommendation to deallocate part of PEA 9 and retain the rest. SADC has also partly followed the recommendation to deallocate all of PEA 14 and has deallocated some of the site but retained the rest to provide sufficient employment land in an accessible part of this area of Harpenden, particularly with the residential growth nearby at North East Harpenden. (NB: Hatch did not assess PEA 12 – the SRFI and PEA 21 – East Hemel Central in this appendix as they are new allocations explicitly supported by Hatch elsewhere in the document. There is no PEA 18.)
- 2.3 As well as retaining these more significant and important allocated employment areas, SADC has given further consideration to less significant employment sites and whether these should be allocated for housing. In a significant number of cases these have been promoted for housing through the various 'Call for sites' processes and have been allocated in the Plan. These employment sites now allocated for housing include:
- B5 - Glinwell, Hatfield Road, St Albans, AL4 0HE – 484 homes
B8 - Harper Lane, north of Radlett, WD7 7HU – 274 homes
UC20 - 104 High Street, London Colney, AL2 1QL – 21 homes
UC25 - 318 Watford Road, Chiswell Green, AL2 3DP – 10 units
UC27 - Berkeley House, Barnet Road, London Colney, AL2 1BG – 8 homes
UC35 - Market Depot, Drovers Way, St Albans, AL3 5FA – 11 homes
UC53 - Motor Repair Garage, Paynes Yard, Park Street Lane, AL2 2NE – 11 homes
(NB: see Proposed Main Modification at SADC/ED85B and SADC/ED85C that proposes an updated capacity of 9 homes)
- 2.4 It is also considered important to recognise that the Plan is generally very supportive of residential development and the statistical evidence for ongoing windfall residential development from employment sites is clear. The evidence set out in answer to M9I1Q2 shows that there is strong evidence that there will be a number of other employment sites not yet allocated for housing that will come forward during the Plan period.

Q3 Are the requirements of Policies EMP1 and EMP3 positively prepared and sufficiently flexible enough to account for changing circumstances over the plan period?

- 3.1 Yes, it is considered that the requirements of Policies EMP1 and EMP3 are positively prepared and sufficiently flexible enough to account for changing circumstances over the plan period. The thrust of the policies are largely based upon the evidence set out in EMP 01.01 - South West Herts Economic Study (2024), as addressed in answer to previous MIQs.
- 3.2 The Council does consider that the policies are positively prepared, as set out in the NPPF when it addresses the test of 'soundness' at:
- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- 3.3 As addressed in response to Matter 5 Issue 1, the Plan is seeking to meet the area's objectively assessed needs for employment in full. Further, the Plan is seeking to meet an element of otherwise unmet need from Dacorum and potentially other South West Herts LPAs.
- 3.4 The Council considers that the requirement of Policies EMP1 and EMP3 are sufficiently flexible to account for changing circumstances over the Plan period, however, the Council remains open to making the policies more flexible should that be required.
10. Paragraph 5.25 of the Plan sets out that the Building Research Establishment and Rothamsted campuses are within the 'Hertfordshire multi-site Envirotech Enterprise Zone', referred to as the Hertfordshire Innovation Quarter ('Herts IQ').

Q4 Is it sufficiently clear what uses are permitted on these sites?

- 4.1 The Council considers that it is sufficiently clear what uses are permitted on these sites, however, the Council remains open to making the policies clearer should that be required.
- 4.2 So far as Rothamsted is concerned, its employment use is addressed directly in the Plan, including at:
- 5.24 St Albans District is home to two nationally and internationally leading research organisations:*

- *Rothamsted Research, which is a world leader in the agri-tech sector and supports an ecosystem of related research and development;*

4.3 The Plan sets out further at Policy EMP4 Hertfordshire Innovation Quarter (Herts IQ)

The Council supports development and redevelopment which provides or supports knowledge-based research and development activities for Herts IQ at the following locations:

- *Rothamsted Research – including expansion of the site through two allocations OS3 and OS4 set out in Part B*

4.4 There is contextual evidence supporting the approach in the Plan, including in EMP 01.01 - South West Herts Economic Study (2024), which includes:

Agri-tech

5.87 South West Herts has well-established strengths in the agri-tech sector, focused specifically on the Rothamsted Research Campus at Harpenden in St Albans. There are currently around 30 businesses based at the site, which are mainly start-ups. The centre includes a number of facilities for businesses in the agri-tech sector, including office and laboratory space and coworking space, which are all fully occupied. Consultees from Rothamsted reported that they had recently developed nine small research & innovation laboratories and these were all let quickly, indicating there is latent demand for additional laboratory space from agri-tech businesses which is not currently being met.

4.5 The Building Research Establishment (BRE) is addressed directly in the Plan, including at:

5.24 St Albans District is home to two nationally and internationally leading research organisations:

...

The Building Research Establishment (BRE), which is engaged in research and innovation in building science and also possesses an innovation park that attracts and supports innovative businesses.

4.6 The Plan sets out further at Policy EMP4 Hertfordshire Innovation Quarter (Herts IQ):

The Council supports development and redevelopment which provides or supports knowledge-based research and development activities for Herts IQ at the following locations:

...

- *Building Research Establishment (BRE)*

4.7 There is contextual evidence supporting the approach in the Plan, including in EMP 01.01 - South West Herts Economic Study (2024), which includes at p136:

...the Building Research Establishment (BRE) which is a nationally leading research institute with an expanding base of businesses on its Bricket Wood, St. Albans site.

- 4.8 The requirements for Rothamsted are set out in some detail in the allocations OS3 and OS4, including as set out in the Key Development Requirements:

OS3 - Extension to Rothamsted Research, Harpenden Campus, AL5 2JQ

...

- 1. Development should be of employment use associated in character with the adjacent research facilities.*
- 2. Connectivity to the Public Rights of Way adjacent to the site.*
- 3. Contributions / enhancements to support relevant schemes in the LCWIP and GTPs.*
- 4. The eastern part of the site lies within Harpenden Conservation Area and adjacent to Locally Listed Buildings. Development proposals should minimise any harm to, and where possible enhance, the setting and significance of these heritage assets.*
- 5. Development proposals must take account of the existing trees on / adjacent to the site.*

OS4 - Extension to Rothamsted Research, Harpenden Campus, AL5 2JQ

...

- 1. Development should be of employment use associated in character with the adjacent research facilities, with new buildings in the eastern half of the site only.*
- 2. Contributions / enhancements to support relevant schemes in the LCWIP and GTPs.*
- 3. Connectivity to the Public Rights of Way adjacent to the site. To support improvements to Harpenden Bridleway 011 (Coach Lane) to enable use by people working at this site for active travel to access the town and train station.*
- 4. Good quality access for all modes to key routes and relevant enhancement of schemes in the LCWIP will be necessary – for example, the A1081 corridor and improved access to the Rights of Way network.*
- 5. Development proposals have the potential to impact the setting of the Grade I Listed Rothamsted Manor and associated Grade II Listed buildings. Development proposals should minimise any harm to, and where possible enhance, the setting and significance of these heritage assets*
- 6. Development proposals must take account of the existing trees on / adjacent to the site.*

Q5 Are sites OS3 and OS4 justified, effective and consistent with national planning policy?

- 5.1 Yes, sites OS3 and OS4 are considered to be justified, effective and consistent with national planning policy.
- 5.2 The NPPF sets out, with regard to the tests of ‘soundness’:

- b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.*

5.3 The main evidence is set out in EMP 01.01 - South West Herts Economic Study (2024), which includes:

Agri-tech

5.87 South West Herts has well-established strengths in the agri-tech sector, focused specifically on the Rothamsted Research Campus at Harpenden in St Albans. There are currently around 30 businesses based at the site, which are mainly start-ups. The centre includes a number of facilities for businesses in the agri-tech sector, including office and laboratory space and coworking space, which are all fully occupied. Consultees from Rothamsted reported that they had recently developed nine small research & innovation laboratories and these were all let quickly, indicating there is latent demand for additional laboratory space from agri-tech businesses which is not currently being met.

...

Findings of other studies

Herts IQ: Future scenarios, SQW

5.104 To inform discussions about the future of Herts IQ, the Hertfordshire LEP commissioned a study by SQW looking at potential scenarios for the future development of the EZ. This was a high level think-piece, rather than an in-depth feasibility or market demand assessment. Nevertheless it provides a useful guide to potential outcomes for the site, and what additional interventions would be needed to realise some of the more aspirational scenarios. Four different scenarios were considered, including a 'do nothing' scenario where development is left to the market (resulting mainly in more B8 development but of a low quality), a scenario in which Maylands becomes a highly automated logistics and distribution park of national significance, and a scenario in which Herts IQ forms a key part of an ambitious growth strategy for Hemel Hempstead which would see it secure city status.

5.105 The most aspirational and ambitious scenario would see Herts IQ become "synonymous with the UK's strongest cluster across a range of environmental technologies". This would include: "a steady flow of start up businesses linked to Rothamsted Research..."

5.4 Support for new allocations to support Rothamsted was also addressed in LPCD 03.01 - St Albans Local Plan Sustainability Appraisal Report (2024), including at:

5.4.71 Finally, there is a need to consider employment land, in light of the consultation response received from Rothamsted Research in 2023 setting out their long-term vision, and in light of the South West Herts Economic Study Update (2024). The new proposal is to: A) allocate greenfield land at the western extent of the campus for employment, rather than housing as was the proposal at the Draft Plan stage; and B) similarly allocate land to the south currently mainly used for parking. These proposals give rise to limited concerns, but the massing and design of buildings will need to account for historic environment constraint.