Matter 5 – Economy and Employment

Issue 5 – Town, City and Village Centres

Q1 Is Table 6.1 justified and based on appropriate, available evidence? If not, what modifications would be necessary to make the Plan sound?

1.1 Yes, Table 6.1 is considered to be justified and based on appropriate, available evidence. This evidence is primarily set out in LCRT 03.01 - St Albans City and District Town Centres Boundaries Study (2023). This sets out on p2 in the Executive Summary:

This technical report presents the St Albans City and District Town Centres Boundaries Study 2023. It is an evidence base document, which has been prepared to inform the emerging new draft Local Plan for St Albans City and District Council. The report informs some of the Council's emerging new draft Local Plan policies for retail and town centre uses and development. This study fulfils national planning policy requirements to define town centres and primary shopping areas. First, it reviews existing designated town centre frontages and boundaries in St Albans District. Second, the report recommends the proposed boundaries of designated town centres for the emerging new draft Local Plan, including: St Albans City Centre, Harpenden Town Centre, 7 district centres and 23 local centres.

1.2 Chapter 3 the Methodology includes:

3.2 At the time of publication, most of the boundaries of existing designated town centres in St Albans District have previously not been defined, as the District Local Plan Review (DLPR) was adopted in 1994 (with some policies 'saved' in 2007). Therefore, the boundaries of each town centre were assessed by using existing Primary Shopping Frontages (PSFs), Secondary Shopping Frontages (SSFs), Class 'A' Frontages (CAFs) and Local Centre Frontages from saved Policies 52 to 55 of the DLPR 1994 as a baseline. Updated defined town centre boundaries in recently made Neighbourhood Plans (where available) were also reviewed. Extracts of maps illustrating existing designated town centre frontages and boundaries in the District are set out in Appendix 1.

3.3 Council officers undertook site visits in August-September 2022 and March-April 2023 to survey the uses within and surrounding the edge of existing town centre frontages (or boundaries where relevant), retail parks and employment (office) areas. Results from these surveys and desktop assessments enabled officers to consider if any changes to proposed area designation boundaries were required to reflect new development, or make the boundaries more coherent. In addition, the planning uses of each unit were recorded at ground floor level within each recommended town centre, retail park and employment (office) area.

3.4 The proposed boundaries of recommended designation areas were updated if any non-main town centre uses at ground floor level (e.g. residential) were recorded, or if there were main town centre uses at ground floor level adjacent to existing *designated frontages or boundaries. Officer area assessments produced a summary, description and recommended boundary map of each designated town centre, primary shopping area, retail park and employment (office) area in St Albans District. These assessments formed the basis of recommendations for the boundaries of retail and town centre area designations in the Council's emerging new draft Local Plan and policies map.*

3.5 Each town centre recommended for designation in the emerging new draft Local Plan hierarchy of centres accords with the definition of town centres set out in the NPPF 2023. Moreover, definitions for the individual town centre designations of city centre, town centre, district centre and local centre are described in the Glossary of Terms at the end of this report. It should be noted that several existing designated local centres from saved Policy 55 (Local Shopping Facilities) of the DLPR 1994 are not recommended for designation in the emerging new draft Local Plan hierarchy of centres, for the following reasons. Surveys and desktop assessments of the centre indicate that it only contains non-main town centre uses; or the centre comprises a grouping of less than three individual (or equivalent gross floorspace) main town centre uses units.

3.6 Each primary shopping area recommended for designation in the emerging new draft Local Plan follows the definition of primary shopping area set out in the NPPF 2023. St Albans City Centre and Harpenden Town Centre each have a designated primary shopping area, as they are the District's largest and most strategically important town centres, given the size, diversity and function of retail uses in both locations. The recommended boundaries of primary shopping areas were formed using existing designated PSFs from saved Policies 52 (Shopping Development in St Albans City Centre) and 53 (Shopping Development in Harpenden Town Centre) of the DLPR 1994 as a baseline. Additional units from some existing designated DLPR 1994 SSFs and CAFs adjacent to existing PSFs were included in the recommended primary shopping area boundaries if they contained a high proportion of retail uses. Some units from existing designated DLPR 1994 PSFs were excluded from the recommended primary shopping area boundaries if they contained non-main town centre uses.

1.3 Chapter 4 Recommendations includes:

4.0.1 This section sets out the main recommendations of the Town Centres Boundaries Study. Section 4 is structured as follows. First, subsection 4.1 outlines the recommended boundaries of designated town centres (including the city centre, town centre, district centres and local centres) and primary shopping areas in the District. Second, subsection 4.2 proposes the recommended boundaries for designated out of centre retail parks in the District. Third, subsection 4.3 sets out the recommended boundaries of protected employment (office) areas in the District.

4.1 Recommended Town Centres Boundaries

4.1.1 This subsection proposes the recommended boundaries of designated town centres in St Albans District for the Council's emerging new draft Local Plan. The *recommended town centre boundaries are categorised in accordance with the proposed emerging new draft Local Plan town centre hierarchy. To begin, the recommended boundaries for the city centre and town centre designations are put forward in subsections 4.1.1 and 4.1.2. Following this, subsections 4.1.3 and 4.1.4 set out the recommended boundaries of designated district centres and local centres. To end, non-recommended former local centres from the saved Policy 55 of the DLPR 1994 are summarised in subsection 4.1.5, and the recommended boundaries of designated primary shopping areas are outlined in subsection 4.1.6.*

4.1.2 Table 1 below sets out the recommended designations of individual town centres in the defined hierarchy of town centres in the Council's emerging new draft Local Plan. The recommended town centre designations comprise 1 city centre, 1 town centre, 7 district centres and 23 local centres.

Table 1: Recommended new draft Local Plan town centre designations

Existing designation (DLPR 1994)	Recommended designation (new draft Local Plan)	Centre
Minor sub-regional centre	*City centre*	St Albans City Centre
Minor district centre	*Town centre*	Harpenden Town Centre
Neighbourhood centres	*District centres*	Southdown, Harpenden
		Redbourn
		Wheathampstead
		Fleetville, St Albans
		Verulam Estate, St Albans
		The Quadrant, Marshalswick, St Albans
		London Colney
Local centres	*Local centres*	8-26 High Oaks, St Albans
		35-41A Abbey Avenue, St Albans
		23-39A Vesta Avenue & 1 Watling View, St Albans
		30-38 Abbots Avenue West, St Albans
		1-10 St Brelades Place, St Albans
		2-36 Beech Road, St Albans
		15-23 Central Drive, St Albans
		38-54 New House Park, St Albans
		399-417 Hatfield Road, St Albans
		153 & 191-207 Cell Barnes Lane, St Albans
		1 Claughton Court, 1-3 Loyd Court & 1 Jacob Court, Russet Drive, St Albans
		385-397 Luton Road, Harpenden
		95-105 Luton Road, Harpenden
		50-54 Westfield Road, Harpenden
		138-146 Lower Luton Road, Harpenden
		103-107 Station Road, Harpenden
		81A-97 Old Watford Road, Bricket Wood
		95-127 Oakwood Road, Bricket Wood
		19-27 Black Boy Wood, Bricket Wood
		2A Tippendell Lane; 301-305, 192-204, 210-212 & 216A Watford Road, Chiswell Green
		2-30 How Wood, How Wood
		69-71 & 68-78 Park Street; 1-2 Park Street Lane, Park Street
		11-15A & 14-18 High Street, Colney Heath
		*New local centres within Broad Locations**

Q2 What are the anticipated needs for retail, leisure, office and other main town centre uses over the plan period and does the Plan allocate a range of suitable sites in town centres to meet the scale and type of development required, as advocated by paragraph 90 of the Framework?

2.1 The Retail Topic Paper (2024) (LCRT 08.01) explains the Council's approach to understanding retail requirements in the new Local Plan.

2.2 The Draft Local Plan includes policies for town centres and retail policies in Chapter 6 of the document.

2.3 The Retail Topic Paper sets out the following:

> *2.1 Shopping habits have altered significantly in recent years, leading to changing requirements for the provision of retail and town centre uses. The rise of internet retailing in particular has caused significant shifts in the way that people shop, with online ordering and home delivery taking a significant proportion of consumer spending away from traditional town centres and even retail parks.*
>
> *2.2 Furthermore, the Covid-19 lockdowns led to further changes in shopping habits, partly driving more people to shop online, and partly to shop locally as more people became accustomed to working from home.*
>
> *2.3 The impact of these changes means that recent years have seen a state of flux for retail and town centre uses, and this has formed the context for preparation of the Local Plan.*

2.4 The Retail Topic Paper goes on to discuss the most recent study undertaken for SADC, and whether a new study would be beneficial or necessary:

> *2.2 St Albans Council undertook a joint study with other nearby local authorities to prepare the South West Hertfordshire Retail and Leisure Study that was published in 2018. This Study provides retail evidence for the new Local Plan, and it is notable that it did not recommend significant increases in town centre or retail floorspace, as can be seen from the following:*
>
> > *'9.8 As a conclusion, there has rarely been a less certain time to forecast retail and leisure needs into the future. We therefore recommend that the Councils take a short/medium-term view on meeting the evolving requirements of their resident populations' retail and leisure needs. We therefore recommend that the Council's place the greatest weight on our forecasts to 2031. …Validation of this thought-process comes in the revised NPPF, which advocates allocating sites for town centre uses to meet capacity for a minimum of "at least ten years" rather than over the full plan period '…*
> >
> > *'9.86 Our forecasts for St Albans show only modest convenience goods capacity at 2026 of up to 2,900 sq m under the most populous forecast, increasing to up to 4,800 sq m net by 2031. The District is characterised by a very large proportion of its convenience (and*

comparison) goods floorspace being met within St Albans and Harpenden, as well as at a range of Local Centres. ... We consider that there is therefore no pressing qualitative need to allocate specific large sites for convenience retail development in St Albans over the next 10 years, and that the capacity identified should be envisaged to support the day-to-day requirements of smaller convenience goods retailers, together perhaps, with providing small-scale Local Centre type floorspace to accompany any major planned urban extensions.'…

'9.87 Turning to comparison goods capacity, we show there to be no capacity headroom for additional floorspace until 2031 under each of the population scenarios. This is due to a combination of the sizable commitment for a further 4,800 sq m net of comparison goods floorspace at Griffiths Way South, together with our reduced market share assumption (as with Hertsmere), that St Albans is likely to experience a reduction of around 9% of its current comparison goods market share as a result of its proximity to a range of planned developments in Luton, and permitted developments at Brent Cross. Accordingly, we recommend that the Council adopts a cautious approach to comparison goods capacity.'…

2.4 While the Study was completed in 2018 it nevertheless aligns with the ongoing changes to shopping habits due to the Covid-19 Lockdowns and increase in online shopping. Due to these factors, SADC decided that a new study was not necessary.

2.5 The Retail Topic Paper goes on to further explain why a new retail study was not undertaken:

2.5 The decision not to commission a new study was reinforced by the findings of the detailed Town Centre Boundaries Study (2023) that significant boundary changes were not required, indicating no great pressure for additional floorspace. This Study also forms part of the evidence base and fulfils the NPPF requirements to define town centres and primary shopping areas.

2.6 SADCs approach is further supported by the responses to the Regulation 18 and 19 consultations which did not result in landowner or retailer requests for significant new retail floorspace. In addition, the Council has not received any planning applications for major new retail developments during the period 2018 – 2024 since the Retail Study was completed.

2.7 It should also be noted that the Local Plan responds to the SWH Retail and Leisure Study 2018 advice 'to support the day-to-day requirements of smaller convenience goods retailers, …with providing small-scale Local Centre type floorspace to accompany any major planned urban extensions.' Therefore, Local Plan policy requires new local centres in the larger strategic sites to meet local needs and support sustainable new communities.

2.6 The draft Local Plan requirement for new local centres as part of the Broad Location developments is in Reg 19 Local Plan Part A (2024) (LPCD 02.01) Strategic Policy SP6 – City, Town and Village Centres and Retail:

The Council will support centres through:

…

h) Developing new local centres within Broad Locations to serve the day-to-day needs of the relevant wider resident catchment population.

2.7 Policy LG3 - Hemel Garden Communities Growth Areas Place Principles also sets out:

<u>Pillar 2 - Integrated Neighbourhoods</u>

b) Deliver new local centres, and enable improvements to existing local centres and Hemel Hempstead Town Centre, and ensure new centres support and complement existing centres;

2.8 The Reg 19 Local Plan Part B (2024) (LPCD 02.02) requires local centres in the key development requirements for sites H1 - North Hemel Hempstead, H2 - East Hemel Hempstead (North), H3 – East Hemel Hempstead (Central), H4 - East Hemel Hempstead (South), B1 - North St Albans, B2 - North East Harpenden, B4 - East St Albans, B7 - North West Harpenden.

2.9 A Main Modification is proposed as follows:

2.10 *Amend clause h) of Policy SP6 as follows:*

h) Developing new local centres within Broad Locations to serve the day-to-day needs of the relevant wider resident catchment population.<u> Local Centres should:</u>
<u>• Prioritise provision of suitable local shops, such as a convenience store;</u>
<u>• Be designed with clustering of other complementary uses nearby, such as primary schools, older persons accommodation, mobility hubs, doctors' surgeries, pharmacies and other community infrastructure investment;</u>
<u>• Maximise good active travel routes from new homes, to encourage walking and cycling.</u>

2.11 It is considered that the new centres, developed within Broad Locations, will provide the focus for new town centre uses, such as retail / class E uses. Other uses, such as health, leisure and community uses are also planned in the new communities and most should be located in or next to the new centres. It is envisaged that they should form a cluster of facilities at a location with convenient access by active travel for the new residents.

2.12 LCRT 04.01 - South West Herts Retail and Leisure Study Report (2018) considered leisure requirements in chapter 8 and concluded that it was not necessary for the Councils to plan for any significant new major leisure facilities over the plan period by way of specific site allocations. It stated the following:

8.99 As part of this Retail and Leisure Study, Nexus has measured the popularity and scale of existing leisure provision against 'benchmarks' in order to ascertain whether there are any gaps in the market where demand is not being met by existing provision.

8.100 In terms of existing market shares, the majority of residents currently make leisure trips within the Study Area. Trips are particularly focused around the higher order towns of Watford, St Albans and Hemel Hempstead, with a notable number of visits also taking place at Borehamwood and Rickmansworth.

8.101 A fair amount of residents are carrying out their leisure activities within Central London. This is to be expected taking account of strong transport links and the appeal of visiting leisure facilities near places of work (particularly health clubs and restaurants).

8.102 Turning to consider the requests for new facilities (Question 44 of the household survey); there were no substantial numbers in any one category, with 68.8% of respondents unable to identify any particular need. In our experience of similar studies across the UK, this is in line with the average of what might be expected, and suggests that provision in the area generally meets its residents' expectations.

8.103 The second highest demand across the Study Area after 'nothing' or 'don't know' was for a new swimming facility (7.6%) followed by cinema facility (6.3%). However, taking the two impending cinema developments (in both Watford and Hemel Hempstead) into consideration, it is assumed this demand will be satisfied.

8.107 In light of our findings, we do not recommend that it is necessary for the Councils to plan for any significant new major leisure facilities over the plan period by way of specific site allocations.

2.13 In terms of office uses, Reg 19 Local Plan Part A (2024) (LPCD 02.01) sets out that:

5.11 St Albans City has the highest concentration of offices in the District, and is second only to central Watford in the South West Herts sub-region. Offices are concentrated within the area around St Albans City Station and around the City Centre in the vicinity of St Peters Street.

5.12 The District has experienced a loss of office floorspace in recent years, driven in part by residential conversions using Permitted Development Rights.

5.13 The restrictions introduced in 2020 due to the COVID-19 pandemic led to a significant increase in homeworking, and there are indications that this may become a long-term trend. Nevertheless, there continues to be a demand for office space and it is important that St Albans provides an appropriate supply of offices accommodation to support growth, investment and employment in the District.

2.14 Office space requirements are addressed in the updated South West Herts (SWH) Economic Study (2024) (EMP 01.01). The Study states in its conclusions, at paragraph 9.23 that:

The study concludes that no new office space and the land associated with it is required over either the 2021-41 or 2041-50 periods. The report found 162,000 sq m of available office space in South West Herts, of which 124,000 sq m was identified as vacant. This includes a high level of availability in the locations in highest demand, including central Watford and St Albans. There is also a further 36,000 sq m of office space with planning permission in the form of commitments. We conclude there is not a need to identify additional sites for office development, but the study recognises that there will be demand for office space. This includes the need for small-scale offices to meet localised needs, and floorspace geared to what is likely to be a small number of larger occupiers. Planning policy will need to determine how the existing supply, and particularly vacant and under-utilised premises, can be redeveloped and refurbished in response.

2.15 The Local Plan Part A protects existing office uses through policy EMP3 - St Albans City Principal Office Locations:

St Albans City is the key office location in the District. Development proposals within PEA1, PEA2 and PEA3 must:

a) Avoid net loss of office floorspace that falls within Use Class E(g)(i); and

b) Provide an active frontage on the ground floor; that within the defined town centre boundary can include retail and leisure uses.

The St Albans City Principal Office Location boundaries are identified on the Policies Map.

Q3 How does the Plan define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre, as required by paragraph 90 of the Framework?

3.1 The Plan defines the extent of town centres and primary shopping areas through the combination of: paragraph 6.12 which sets out “The boundaries of City, town, district and local centres are identified on the Policies Map”; Strategic Policy SP6 – City, Town and Village Centres and Retail, including Table 1. Centre Hierarchy; and as set out on the Policies Map.

3.2 The Plan makes clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre. The most relevant aspects of the Plan include:

Strategic Policy SP6 – City, Town and Village Centres and Retail

The Council supports City, town and village centres as essential locations that provide retail, services, leisure and entertainment, and many other functions to local people, workers and visitors. The continuing vitality and viability of Centres will be promoted, along with diversification where appropriate.

The Council will support centres through:

a) Applying a 'town centre first' approach to proposals for retail, services and other main town centres uses in accordance with the defined Centre Hierarchy and the sequential approach set out in the NPPF;

b) Managing and evolving the District's centres to provide a range of town centre uses and functions;

c) Maintaining the District's Centre Hierarchy as per Table 6.1;

d) Seeking to enhance the role of St Albans City Centre as a key, sustainable destination through proposals that improve the quality and broaden the range of retail, service, leisure, cultural and civic / community facilities, including St Albans Charter Market;

e) Setting out a City Vision for St Albans City Centre;

f) Seeking to enhance the role of Harpenden Town Centre as a key, sustainable destination through proposals that improve the quality and broaden the range of retail, service, leisure, cultural and civic / community facilities, including the existing farmers market;

…

Protecting Retail and Main Town Centre Uses

6.13 The District's town centres are places that provide retail, services, leisure and entertainment, and many other uses for residents and visitors. These locations are a key focus for local communities and are often accessible by sustainable transport options. The Council will therefore resist the loss of town centre uses.

6.14 A Primary Shopping Area is a defined area within a centre where retail uses are concentrated. The Council is required by national policy to define the extent of town centres and Primary Shopping Areas, and make clear the range of uses permitted in such locations as part of a positive strategy for the future of each centre. St Albans and Harpenden centres have designated Primary Shopping Areas due to their size, diversity and function.

TCR1 – Protecting Retail and Main Town Centre Uses

The Council will protect retail and main town centre uses through the following approach:

a) Within the defined Primary Shopping Areas -

i. Resist the loss of existing retail (Use Class E(a));

ii. Support development proposals at ground floor level for the following uses:

- *Retail (Use Class E(a));*
- *Food and drink (Use Class E(b));*
- *Financial, professional and other services (Use Class E(c)); and*
- *Drinking establishments (including bars and pubs) (sui generis).*

iii. Support development proposals at above ground floor level for the following uses:

- *Retail (Use Class E(a));*
- *Food and drink (Use Class E(b));*
- *Financial, professional and other services (Use Class E(c));*

- *Drinking establishments (including bars and pubs) (sui generis);*
- *Crèches, day nurseries or day centres (Use Class E(f));*
- *Other main town centre uses as defined in the NPPF;*
- *Learning and non-residential institutions (Use Class F1); and*
- *Residential (Use Class C3).*

b) Within the defined City, town, district and local centres but outside of the *Primary Shopping Areas -*

i. Support development proposals at ground floor level for the following uses -

- *Commercial, Business and Service (Use Class E); and*
- *Learning and non-residential institutions (Use Class F1).*

ii. Support development proposals at above ground floor level for the following uses:

- *Commercial, Business and Service (Use Class E);*
- *Other main town centre uses as defined in the NPPF;*
- *Learning and non-residential institutions (Use Class F1); and*
- *Residential (Use Class C3).*

c) Proposals within defined centres that result in the loss of Commercial, Business and Service (E), Learning and non-residential institutions (F1) or Local Community (F2) Class Uses at ground floor level must demonstrate that:

i. The unit has been proactively and appropriately marketed for at least 18 months (within the defined Primary Shopping Areas) or at least 12 months (outside the defined Primary Shopping Areas), and

it has been demonstrated that there is no longer a realistic prospect of the unit being used for E, F1 or F2 Class uses in the foreseeable future;

ii. The unit is no longer needed to meet the needs of the community within the local area; and

iii. The proposal will not have an adverse impact on the vitality and viability of the centre as a whole.

3.3 Evidence supporting the approach above is primarily set out in LCRT 03.01 - St Albans City and District Town Centres Boundaries Study (2023), including in particular “4.1.6 Recommended Primary Shopping Areas Boundaries”.

3.4 Further detail is also given through the Plan in the City Vision for St Albans at paragraphs 6.18-6.24 and through Policies TCR 4-7.

Q4 Is the Plan consistent with paragraphs 91-95 of the Framework, having particular regard to the application of the sequential and impact tests?

4.1 Yes, the Plan is considered to be consistent with paragraphs 91-95 of the Framework, including having particular regard to the application of the sequential and impact tests. The approach overall is set out in Chapter 6, comprising: aspects of the supporting text; Policy Strategic Policy SP6 – City, Town and Village Centres and Retail; Policy TCR1 – Protecting Retail and Main Town Centre Uses; Policy TCR2 – Retail Uses outside Existing Centres (including through the proposed Main

Modification at TCR 2a); and Policy TCR3 – Out of Centre Retail Parks ((including through the proposed Main Modification at TCR 3b).

4.2 In particular, Strategic Policy SP6 – City, Town and Village Centres and Retail ensures the application of the sequential and impact tests, in accordance with the NPPF. It states:

...The Council will support centres through:
a) Applying a 'town centre first' approach to proposals for retail, services and other main town centres uses in accordance with the defined Centre Hierarchy and the sequential approach set out in the NPPF;...

4.3 Further detail is also given through the Plan in the City Vision for St Albans at paragraphs 6.18-6.24 and through Policies TCR 4-7.

Q5 What is the justification for Policy TCR3? Is it sufficiently clear what uses and scale of development the policy allows for?

<u>What is the justification for Policy TCR3?</u>

5.1 The justification is that the existing Out of Centre Retail Parks have a positive role to play in providing for retail uses that cannot readily be accommodated in town centres; but they also have negative features that need to be appropriately managed, including issues of congestion, access issues for pedestrians and cyclists, lack of green space and sometimes relating poorly to their surrounding areas. The evidence for this is primarily set out in LCRT 03.01 - St Albans City and District Town Centres Boundaries Study (2023). This sets out in particular:

4.2 Recommended Out of Centre Retail Parks Boundaries

4.2.0.1 This subsection proposes the recommended boundaries of designated out of centre retail parks in St Albans District for the Council's emerging new draft Local Plan. The recommended out of centre retail parks comprise groupings of relatively large retail units or warehouses, which are located outside of designated town centres and within existing urban areas.
…
4.2.1 St Albans Retail Park, Griffiths Way, St Albans

4.2.1.1 A map of the recommended boundary for the designated out of centre retail park at St Albans Retail Park, Griffiths Way, St Albans is illustrated in Figure 42 below.

Description

4.2.1.2 This out of centre retail park is located in Griffiths Way in the urban area of St Albans, southeast of St Albans Abbey station. It comprises groupings of large convenience and comparison retail units and warehouses for mostly national retailers, as well as large car parking areas. This out of centre retail park also includes two drive-through restaurants, a gym and petrol filling station.
Recommended out of centre retail park boundary

4.2.1.3 The saved policies of the DLPR 1994 do not define boundaries for out of centre retail parks in St Albans District. Therefore, a new recommended boundary for the out of centre retail park at St Albans Retail Park, Griffiths Way, St Albans is defined below.

4.2.1.4 The following properties at the addresses below are included within the recommended out of centre retail park boundary at St Albans Retail Park, Griffiths Way, St Albans:

- *Sainsburys Everard Close*
- *Units 1-6 St Albans Retail Park Griffiths Way*
- *3-5 & The Range Graham Close*

…
4.2.2 Alban Park, Acrewood Way & Acrewood Park Retail Park, Hatfield Road, St Albans

4.2.2.1 A map of the recommended boundary for the designated out of centre retail park at Alban Park, Acrewood Way & Acrewood Park Retail Park, Hatfield Road, St Albans is illustrated in Figure 43 below.

Description
4.2.2.2 This out of centre Retail Park is located in Hatfield Road in the east of the urban area of St Albans. It comprises groupings of large comparison retail units and warehouses for mostly national retailers, as well as large car parking areas. This out of centre retail park also includes two car repair workshop units.
Recommended out of centre retail park boundary

4.2.2.3 The saved policies of the DLPR 1994 do not define boundaries for out of centre retail parks in St Albans District. Therefore, a new recommended boundary for the out of centre retail park at Alban Park, Acrewood Way & Acrewood Park Retail Park, Hatfield Road, St Albans is defined below.

4.2.2.4 The following properties at the addresses below are included within the recommended out of centre retail park boundary at Alban Park, Acrewood Way & Acrewood Park Retail Park, Hatfield Road, St Albans:

- *1 & Unit 2 Alban Park Hatfield Road*
- *Wickes & Units 1-6 Acrewood Park Acrewood Way*

…
4.2.3 Colney Fields Shopping Park, Barnet Road, London Colney

4.2.3.1 A map of the recommended boundary for the designated out of centre retail park at Colney Fields Shopping Park, Barnet Road, London Colney is illustrated in Figure 44 below.

Description
4.2.3.2 This out of centre retail park is located in the southeast of the urban area of London Colney. It comprises groupings of large convenience and comparison retail units and warehouses for mostly national retailers, as well as a large car parking area. This out of centre retail park also includes a petrol filling station and car wash. Recommended out of centre retail park boundary

4.2.3.3 The saved Policies of the DLPR 1994 do not define boundaries for out of centre retail parks in St Albans District. Therefore, a new recommended boundary for the out of centre retail park at Colney Fields Shopping Park, Barnet Road, London Colney is defined below.

4.2.3.4 The following properties at the addresses below are included within the recommended out of centre retail park boundary at Colney Fields Shopping Park, Barnet Road, London Colney:
 Units 1-7 Colney Fields Shopping Park and Sainsburys Petrol Station Barnet Road

5.2 LCRT 04.01 - South West Herts Retail and Leisure Study Report (2018) acknowledges the role of out of centre retail provision as follows:

Paragraph 7.2
‘South-West Hertfordshire where a significant proportion of existing retail floorspace is found in town centre locations, as opposed to out-of-centre locations’

Paragraph 9.14
‘Of the 17 centres we study in detail, only Watford, Hemel Hempstead and St Albans have notable out-of-centre retail parks nearby.’

Figure 4.11 Out of Town Centre Convenience Retail refers to
- *Everard Close, St. Albans*
- *Colney Fields Shopping Park, London Colney*

Figure 4.12 Out of Town Centre Comparison Retail refers to
- *Abbey View Retail Park, Griffiths Way, St. Albans*
- *Colney Fields Shopping Park, Barnet Road, London Colney*

5.3 Further justification is set out directly in the Plan itself at:

Out-of-Centre Retail Parks
6.16 Out-of-centre retail parks provide large retailing units that cannot be accommodated in town centres, together with extensive, typically free, car parking. The units will typically be for national or regional retail chains. The transport focus is very much on the access by private car, which can lead to issues with congestion. Together with the relatively low building density, access issues for pedestrians and

cyclists, and a lack of green space, retail parks can relate poorly to the surrounding areas and be low in terms of environmental sustainability. The District has large retail parks at London Colney, Hatfield Road and Griffiths Way, St Albans.

5.4 The previous approach in the 1994 adopted Plan can also be noted. The 1994 Plan recognised out of centre retail development outside existing town centres in Policy 58 and the associated reasoned justification. It includes the following references:

- Policy 58 Part of Former Gas Works, Griffiths Way, St Albans
- Policy 58 Marconi and Timber Yard, Hatfield Road, St Albans
- Policy 58 Barnet Road, London Colney
- Paragraph 6.28 (i) of the 1994 Plan refers to 'three existing D.I.Y. stores at Alban Park (Hatfield Road St Albans) '... Purpose built retail park , at Griffiths Way St Albans....On a site adjacent to this, permission exists for a further 5,500 sqm of non-food retail warehousing.
- Paragraph 6.28 (ii) of the 1994 Plan refers to a 'Sainsbury superstore ...opened on the gas works site'...Planning permission has been granted ...to build a supermarket on the Marconi and Timber Yard site at Hatfield Road, Fleetville.
- Paragraph 6.28 of the 1994 plan refers to 'Savacentre hypermarket...opened at Barnet Road, London Colney'.

5.5 For Hatfield Road, the 1994 Plan site EMP 10 has evolved into PEA 6 and the Out of Town Retail Park to best reflect how they have evolved and to positively shape future development for these areas.

5.6 LPCD 03.01 - St Albans Local Plan Sustainability Appraisal Report (2024) states:

Policy TCR3 (Out-of-Centre Retail Parks) – supports the existing retail parks

<u>Is it sufficiently clear what uses and scale of development the policy allows for?</u>

5.7 Yes, it is considered that the Policy is sufficiently clear concerning what uses and scale of development the Policy allows for.

5.8 In particular, Policy TCR3 - Out-of-Centre Retail Parks provides the basis for considering future planning proposals. It is proposed that the policy approach will be enhanced with the main modifications as set out below. In addition to policies TCR2 and TCR3, Strategic Policy SP6 ensures that a town centre first and sequential approach should be applied to main town centre uses as set out in the NPPF.

5.9 Main Modifications to TCR 2 and TCR 3 are proposed as follows, which should provide further clarity:

Amend Clause a) of Policy TCR2 as follows:

a) Resist proposals for new town centre uses unless <u>they are within a designated</u>

Out of-Centre Retail Park, or they are within isolated rural areas that meet the definition of Local Community Shop under Use Class F2(a); and

Amend Policy TCR3 as follows:

a) The Council supports the existing retail parks to provide large-scale retailing. ~~Proposals~~ Retail proposals within the existing retail parks will be supported where they are of an appropriate scale to the location, meet the sequential test, satisfy an impact assessment and improve sustainability by:
i. Providing layouts, public realm and building designs to respond to the surrounding area;
ii. Providing high quality and effective pedestrian and cycling and public transport infrastructure on and off-site, including provision for cargo bikes;
iii. Increasing green coverage through tree planting and providing areas of natural planting; and
iv. Use of Sustainable Drainage Systems.
b) The limited number of larger footprint retail units provide a valuable retail format which complements the offer of the centres and should be retained. Conditions may be added so as to restrict the use and the range of goods sold, to prevent the sub division of larger footprint units, and to prohibit future occupation by an existing / recent retailer present in one of the nearby centres, in order to not adversely affect the viability and vitality of nearby shopping centres.

Q6 Is the Plan consistent with paragraph 88 of the Framework, which states that planning policies should enable the sustainable growth and expansion of all types of businesses in rural areas, both through the conversion of existing buildings and well-designed, beautiful new buildings?

6.1 Yes, it is considered that the Plan is consistent with paragraph 88 of the Framework, which states that planning policies should enable the sustainable growth and expansion of all types of businesses in rural areas, both through the conversion of existing buildings and well-designed, beautiful new buildings.

6.2 The Plan directly enables and supports businesses in rural areas in a variety of ways, including addressing all the key aspects identified at NPPF paragraph 88:

88. Planning policies and decisions should enable:
a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, beautiful new buildings;
b) the development and diversification of agricultural and other land-based rural businesses;
c) sustainable rural tourism and leisure developments which respect the character of the countryside; and
d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.

6.3 The Plan sets out:

The Rural Economy

5.15 St Albans District has large rural areas and the Council fully supports a thriving farming sector, along with the leisure and visitor aspects of the rural economy. This includes farm shops and equestrian facilities along with the more flexible use of farm buildings, developing small-scale localised renewable energy projects and improving rural broadband.

5.16 Environmental Land Management schemes are intended to support the rural economy while achieving the goals of the 25 Year Environment Plan and a commitment to net zero emissions by 2050. Through these schemes, farmers and other land managers may enter into agreements to be paid for by the Government.

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 also supports a prosperous rural economy and will in principle consider positively the sustainable growth of rural businesses, including diversification of agriculture, tourism, schemes that retain local services and community facilities, broadband provision, small-scale renewable energy for local use, and support for Environmental Land Management Schemes.
…
TCR2 – Retail Uses outside Existing Centres
Outside of the Town Centre Hierarchy the Council will:
a) Resist proposals for new town centre uses unless they are within isolated rural areas that meet the definition of Local Community Shop under Use Class F2(a)
…
Visitor Economy
6.17 The District has many attractions including museums and unique heritage such as the Roman town of Verulamium and St Albans Cathedral. Visitors are drawn in by the attractive and vibrant town centres such as St Albans City Centre and at Harpenden. The villages, rural areas and natural environment such as Heartwood Forest also provide places which bring people into the District. Visitors to the District also contribute to the local rural economy and support local businesses and jobs.
…
TCR4 - Visitor Economy
The Council will support the rural and visitor economy by:
a) Supporting in principle the development of new or improved visitor infrastructure, including hotels, cafes and restaurants, and transport, and visitor

attractions including historic buildings, museums, theatres and markets; subject to other policies in this Plan;
b) Supporting where appropriate provision of information boards, heritage trails, route markers and other infrastructure that assists visitors to understand, appreciate and move around the District's visitor attractions; and
c) Supporting wherever possible access to visitor attractions and sites by sustainable transport, such as by train, bus, walking and cycling.

6.4 Further detailed policy is set out in LG9 – Extension or Replacement of Buildings in the Green Belt.

Q7 Are Policies TCR4-TCR7 justified, effective and consistent with national planning policy?

7.1 Yes, it is considered that Policies TCR4-TCR7 are justified, effective and consistent with national planning policy. They are considered to reflect some of the unique characteristics of the District, particularly St Albans City, that the Plan is rightly seeking to protect and enhance. They also seek to ensure that outcomes support placemaking.

7.2 The supporting text at paragraph 6.17 applies to the whole District and recognises the significance of the visitor economy, which is followed through with the positively worded Policy TCR4 - Visitor Economy.

Visitor Economy

6.17 The District has many attractions including museums and unique heritage such as the Roman town of Verulamium and St Albans Cathedral. Visitors are drawn in by the attractive and vibrant town centres such as St Albans City Centre and at Harpenden. The villages, rural areas and natural environment such as Heartwood Forest also provide places which bring people into the District. Visitors to the District also contribute to the local rural economy and support local businesses and jobs.

7.3 The supporting text at paragraphs 6.18-6.24 and Policies TCR5 - St Albans City Centre Culture, Heritage, Civic Pride and the Leisure Economy, TCR6 – St Albans City Centre Public Realm and movement, and TCR7 – St Albans City Centre – Vibrant and Mixed City Centre Economy are focussed on the 'City Vision' central St Albans area. They in part reflect the unique historic and cultural context of the centre of St Albans City and in part reflect the fact that the central City area is the only part of the District that is unparished and does not have a 'made' or emerging Neighbourhood Plan. The supporting text in the draft Plan sets out:

St Albans City Vision

6.18 St Albans City Centre makes up much of the core of the cathedral city and market town which has a distinctive heritage which includes historic buildings, landscapes and archaeology. It has a defined Conservation Area, established over 50 years ago, which covers the medieval core of the city plus key nineteenth century developments and areas of townscape and landscape value. It has a vibrant street market, good shopping, entertainment, eating and hospitality facilities and well-located hotels.

6.19 Overall there is an aspiration to achieve a high quality public realm, improving the quality of the environment for residents, businesses and visitors.

6.20 There have been successful recent buildings that had responded positively to the local heritage whilst providing modern architectural approaches and valued new facilities. There will continue to be change and growth most particularly in St Peters Street and its vicinity.

6.21 A large number of people live within the city centre. This residential role is an important one and both residential amenity and the vibrancy of the wide mix of uses need to continue to be balanced. Development that would cause significant harm to residential amenity will not be supported.

6.22 The City Vision area does not have a defined area – it comprises the City Centre (as defined in Policy SP 6) plus a wider area with strong linkages to the central area; this area is deliberately not defined precisely on the Policies Map.

7.4 Further, aspects of these Policies directly address aspects of NPPF paragraph 90, including:

90. Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should:
…
c) retain and enhance existing markets and, where appropriate, re-introduce or create new ones;
…
f) recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.

7.5 This is addressed directly in Policies TCR 5-7 in a number of places, including:

TCR7 – St Albans City Centre – Vibrant and Mixed City Centre Economy
To continue to support and enable a vibrant and mixed city centre economy the Council will support:
…
b) Residential uses on upper floors on appropriate sites in the city centre, whilst maintaining active ground floor uses.
c) A positive evolution of St Peters Street and its immediate vicinity which includes a variety of building heights, respecting and complementing existing scale,

massing, and materials, with a role for residential and hotel uses on upper floors – noting that these must not conflict with a lively city centre environment, for example the Charter Market

7.6 Lastly, there is an important role to play for the draft Plan in positively signalling to those considering investing in the City Vision area, the types of uses that the Council would seek to support and would be seen to positively enhance the area. This is addressed directly in Policies TCR 5-7 in a number of places, including:

TCR7 – St Albans City Centre – Vibrant and Mixed City Centre Economy
To continue to support and enable a vibrant and mixed city centre economy the Council will support
…
a) A distinctive concentration and diversity of independent businesses / retail / food and drink offering.
b) Residential uses on upper floors on appropriate sites in the city centre, whilst maintaining active ground floor uses.
c) A positive evolution of St Peters Street and its immediate vicinity which includes a variety of building heights, respecting and complementing existing scale, massing, and materials, with a role for residential and hotel uses on upper floors – noting that these must not conflict with a lively city centre environment, for example the Charter Market.
d) Expansion of health uses in city centre locations.
e) Flexible rentable meeting rooms and workstations or pods, online businesses and start-ups.

7.7 LPCD 03.01 - St Albans Local Plan Sustainability Appraisal Report states:

Policy TCR5 (St Albans City Centre Culture, Heritage, Civic Pride and the Leisure Economy) – is broadly supported, although there is only criterion on heritage, dealing with a very specific matter."