Shaping growth in Dacorum

DACORUM BOROUGH COUNCIL

Retail and Town Centres Background Topic Paper

Dacorum Local Plan (2020-2038)
Emerging Strategy for Growth
November 2020

Background Topic Papers

Introduction

A series of background topic papers have been prepared to support the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth consultation. These are as follows:

- **Climate Change and Sustainability**
- **The Development Strategy**
- **Housing**
- **Site Selection**
- **The Green Belt & Rural Area**
- **Employment**
- **Retail and Town Centres**
- **Transport and Connectivity**
- **Open Space, Sport and Leisure**
- **Chilterns Beechwoods SAC**

These topic papers have been produced to present a coordinated view of the evidence that has been considered in drafting the Local Plan Emerging Strategy for Growth. These papers form part of the evidence base. It is intended that these papers will make it easier to understand how the Council has reached conclusions on specific matters.

Their role is to inform the content of the Local Plan Emerging Strategy for Growth through:

(a) summarising background policy, guidance and advice relevant to each subject area; and
(b) assessing which sites, designations and/or boundary changes it is appropriate to take forward in the context of this advice and set out any additional selection criteria used.

Contents

Appendices

1. INTRODUCTION

1.1 The Borough of Dacorum is facing challenging pressures for new development which it must tackle over the next 18 years through the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth. In particular, the need for homes, employment land and associated infrastructure is much higher than faced by previous Plans yet this has to be planned for in the context of the same extensive planning and environmental constraints. Thus the Plan must demonstrate how it has taken into account the many constraints and opportunities of the Borough.

1.2 This topic paper provides a summary of how the retail and town centres policies and preferred proposals for the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth have emerged and what has influenced them. It explains what the Plan took into account in developing the approach and how it has narrowed down reasonable policy options, identified Plan allocations, and highlighted changes to the Policies Map in terms of its:

- evidence base;
- feedback from the Issues and Options consultation; and
- ongoing engagement with key stakeholders and meeting its obligations under the Duty to Cooperate.

1.3 Future floorspace needs for retail and other town centres uses may be affected by the current Covid-19 pandemic. It is not possible to make an accurate forecast at present, but we will give the matter further consideration before publishing the next stage of the Local Plan.

1.4 This topic paper is published alongside the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth for consultation. It should be read in conjunction with a series of related and complementary topic papers that explain the Plan’s overall policies, visions and objectives.

2. PLANNING POLICY CONTEXT

2.1 The preparation of the new Local Plan, particularly in developing a spatial strategy for the Borough, has been influenced by a broad national, strategic and local policy context and strategies.

(a) National Planning Policy Framework

2.2 National advice on retailing and other town centre uses is provided through the National Planning Policy Framework (NPPF), with further guidance through the Government's Planning Practice Guidance (PPG). Elements of the NPPF that influence preparing the Local Plan's policies on retail and town centres are summarised below.

2.3 Section 7 in the NPPF provides guidance on 'Ensuring the vitality of town centres'. Guidance on planning policies is contained in paragraphs 85, which states that:

> *"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, and adaptation. Planning policies should:*
>
> *a) define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;*
>
> *b) 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;*
>
> *c) retain and enhance existing markets and, where appropriate, re-introduce or create new ones;*
>
> *d) allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under review where necessary;*
>
> *e) where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies should explain how identified needs can be met in other accessible locations that are well connected to the town centre; and*
>
> *f) recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites."*

2.4 The rest of NPPF section 7 (paragraphs 86-90) deals with the sequential test and impact assessment, which should be used when local planning authorities consider planning applications. In particular, paragraphs 86 and 87 on the sequential test advise that:

"86. Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.

87. When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored."

2.5 Paragraph 90 provides the following guidance:

"When assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500m2 of gross floorspace). This should include assessment of:

a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and

b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme)."

2.6 Annex 2 to the NPPF defines the following terms that are relevant to planning for retail and town centres: edge of centre, main town centre uses, out of centre, primary shopping area and town centres.

2.7 The definitions of 'main town centre uses' and 'town centre' are particularly important from a planning policy perspective and are set out below:

*"**Main town centre uses:** Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).*

***Town centre:** Area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres* *or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres."*

2.8 When Local plans are examined they must have been prepared in accordance with legal and procedural requirements, and satisfy the tests of "soundness" (paragraph 35). Plans are 'sound' if they are:

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;

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.

(b) Planning Practice Guidance on Town Centres and Retail

2.9 Further national guidance is provided through the Planning Practice Guidance (PPG). Key points in the PPG on 'Town centres and retail' that add to the guidance in the NPPF are highlighted below.

2.10 Paragraphs 001-006 in the PPG are concerned with planning for town centre vitality and viability. Points made in addition to the guidance in the NPPF include the following:

- Local planning authorities can take a leading role in promoting a positive vision for town centres, bringing together stakeholders and supporting sustainable economic and employment growth.

- A wide range of complementary uses in town centres and evening and night time activities can help support the vitality of town centres.

- Evening and night time activities have the potential to increase economic activity within town centres and provide additional employment opportunities.

- The key way to set out a vision and strategy for town centres is through the development plan and (if needed) supplementary planning documents.

- Planning policies are expected to define the extent of primary shopping areas. Authorities may, where appropriate, also wish to define primary and secondary retail frontages where their use can be justified in supporting the vitality and viability of particular centres.

- Town centre strategies should be based on evidence of the current state of town centres and the opportunities that exist to accommodate a range of suitable development and support their vitality and viability. Strategies can be used to establish the various matters stated in paragraph 004.

- It may not be possible to accommodate all forecast needs for main town centre uses in a town centre. In those circumstances, planning authorities should plan positively to identify the most appropriate alternative strategy for meeting the identified need for these main town centre uses, having regard to the sequential and impact tests.

2.11 Paragraphs 007 and 008 in the PPG deal with permitted development and change of use in town centres. The first of these paragraphs is of great importance.

2.12 Paragraph 007 explains when planning permission is not required for changes involving town centre uses. It states that:

> "A change of use of land or buildings requires planning permission if it constitutes a material change of use. Many uses in town centres fall within Commercial, Business and Service use class. Movement from one use to another within the same use class is not development, and does not require planning permission."

2.13 This paragraph goes on to say that:

> "A broad range of national permitted development rights support appropriate changes of use in town centres. These rights are set out in the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended. Many of these permitted development rights relate to uses defined in the Use Classes Order before it was amended on 1 September 2020. These rights will continue to apply in their current form until 31 July 2021."

2.14 Paragraph 007 also provides guidance on:

- permitted development rights which allow a change of use without any application process.

- Further permitted development rights which allow for a change of use subject to prior approval by the local planning authority on specific planning matters.

2.15 The rest of the PPG covers the assessment of out of centre developments. Of particular relevance are paragraphs 010 and 016, which deal with how the sequential and impact tests should be used in plan-making.

(c) Use Classes Order and General Permitted Development Order

2.16 As is evident from paragraphs 2.11-2.14 above, the policies on retailing and town centres in the new Local Plan must take account of the Government's Use Classes Order and General Permitted Development Order.

2.17 The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 made significant changes to the Use Classes Order from 1 September 2020. These changes allow far greater flexibility to change uses within town centres without the need to obtain planning permission.

2.18 The new approach aims to promote the vitality and viability of town centres by allowing more diversification in a way that can respond to rapid changes in the retail and leisure sectors. However, it restricts the ability of local planning authorities to control the mix of uses. Therefore, authorities now need to re-think their policy/strategies for town centres, with less emphasis on retail as the key attraction.

2.19 The changes provide for three new uses classes:

- Class E (commercial, business and service)
- Class F.1 (learning and non-residential institutions)
- Class F.2 (local community)

2.20 Most shops (formerly Class A1) are now within Class E. Other former use classes that have been subsumed into Class E are A2 (financial/professional services), A3 (food and drink), part of D1 (non-residential institutions, including clinics and crèches) and part of D2 (assembly and leisure, covering gyms and indoor recreation). Pubs, bars, cinemas, live performance venues and dance and bingo halls are now sui generis (i.e. uses that do not fall within any particular use class for the purposes of planning permission).

2.21 The position is summarised in the table below:

Use	**Use Class**	
	Up to 31.08.20	**From 01.09.20**
Shop – unless now F.2 (see below)	A1	E
Shop not more than 280sqm mostly selling essential goods, including food and at least 1km from another similar shop	A1	F.2
Financial and professional services	A2	E
Café or restaurant	A3	E
Pub or drinking establishment	A4	Sui generis
Hot food takeaway	A5	Sui generis

Hotels, boarding and guest houses	C1	C1
Clinics, health centres, crèches, day nurseries, day centre	D1	E
Museums, public libraries	D1	F.1
Cinemas, concert halls, bingo halls and dance halls	D2	Sui generis
Gymnasiums, indoor recreation not involving motorised vehicles or firearms	D2	E

(d) South West Hertfordshire Joint Strategic Plan (JSP)

2.22 Dacorum has a substantial history of co-ordinated working on planning issues and its evidence base, with adjoining districts. It has agreed with St Albans, Three Rivers, Watford and Hertsmere Councils and Hertfordshire County Council to prepare a place growth and development Plan (Joint Strategic Plan) up to 2050 for South West Hertfordshire. This includes a signed Memorandum of Understanding between the partners. They have also secured planning delivery funding from the Ministry of Housing, Communities and Local Government to deliver the JSP.

2.23 Given the time horizon of the JSP, it has not influenced how the Council prepared the development strategy in the Local Plan Emerging Strategy for Growth.

(e) Local Plan Context

2.24 The following Plan documents will be replaced by the new Local Plan:

- Dacorum Borough Local Plan 1991-2011 (adopted April 2004) (saved policies);
- Dacorum Core Strategy (adopted September 2013); and
- Dacorum Site Allocations Development Plan Document (adopted July 2017).

2.25 There is only one “made” Neighbourhood Plan (covering the neighbourhood of Grovehill in Hemel Hempstead). Two other plans are being prepared, for Bovingdon and Kings Langley.

Dacorum Core Strategy

2.26 This document contains the Council’s strategic policy framework. Policy NP1 sets out the NPPF national presumption in favour of sustainable development and positive approach to development.

2.27 Table 5 in the Core Strategy identifies the following retail hierarchy:

Type of centre	Location
Principal town centre	Hemel Hempstead
Secondary town centre	Berkhamsted, Tring
Local centre - with a district shopping function	Woodhall Farm
Local centre - with a neighbourhood shopping function	Adeyfield Apsley Bennetts End (Bennettsgate) Bovingdon Boxmoor (St. John's Road) Chaulden Gadebridge (Rossgate) Grovehill Heart of Maylands Highfield (Bellgate) Highfield (The Heights) Kings Langley Leverstock Green Markyate Miswell Lane (and Western Road) Nash Mills (The Denes) Northchurch

2.28 Policy CS16 on shops and commerce seeks to strengthen the main retail hierarchy of town centres and local centres, with most retail development being directed there. New retail development will be permitted if it accords with the retail hierarchy and conforms to the sequential approach. Outside defined centres, retail development will be permitted only if it is acceptable in terms of the sequential approach and impact assessment.

2.29 The policy contains guidance on retail floorspace increase in each of the towns between 2009 and 2031. Opportunities will be given to provide capacity for this amount of retail floorspace, if there is demand.

2.30 Policy CS16 also states that Hemel Hempstead will be the main destination for comparison goods shopping, leisure, entertainment and civic and cultural activities. Other centres will provide core shopping facilities and services for their local economies.

2.31 Other relevant Core Strategy policies include Policy CS1: Distribution of Development, CS2: Selection of Development Sites, CS4: The Towns and Large Villages, CS33: Hemel Hempstead Town Centre and CS34: Maylands Business Park. Policy CS4 seeks a mix of uses in town and local centres, whilst Policy CS34 includes a guiding principle to deliver a local centre in the Heart of Maylands to support residents and workers there.

2.32 The Hemel Hempstead Place Strategy in the Core Strategy contains a vision for the town centre and sets out development opportunities for seven different town centre character zones. Policy CS33 outlines the principles that should guide development within the town centre, including:

- secure additional retail stores in the Marlowes Shopping Zone (and a new foodstore);
- deliver a mix of uses to support the prime retail function;
- encourage an attractive evening economy along Waterhouse Street;
- deliver new leisure, education and cultural facilities, including a primary school and library; and
- keep a public sector presence.

Dacorum Site Allocations Development Plan Document

2.33 The Site Allocations document provides more detailed site specific policies and proposals than the Core Strategy. All of Dacorum is covered in the Site Allocations except for east Hemel Hempstead, including the Maylands Business Park.

2.34 Policy SA7 (shopping areas in town centres) states that each town centre contains a key shopping area, which comprises primary and secondary frontages. The policy indicates what land uses will be permitted in these frontages at ground floor level.

2.35 Chapter 5 on ‘supporting retail and commerce’ also contains:

- Table 1, which lists the out of centre retail locations in the Borough and shows the main uses on each site.

- The ‘Schedule of Retail Proposals and Sites’. Three sites are listed, namely, two out of centre sites (where retail development had already been permitted) and the West Herts College/Civic Zone site in Hemel Hempstead (where mixed use development, including retail, is proposed).

Dacorum Borough Local Plan 1991-2011

2.36 The following policies in section 6 (shopping) of the 2004 Local Plan are ‘saved’ (i.e. still operational):

- Policy 43: Shopping areas in local centres
- Policy 44: Shopping development outside existing centres
- Policy 45: Scattered local shops
- Policy 46: Garden centres
- Policy 47: Amusement centres
- Policy 48: Window display

2.37 Policy 43 deals with proposals for the loss of shops in local centres. Despite being saved, Policy 44 has been partly superseded by the guidance on retail development outside defined centres in Core Strategy Policy CS16.

(f) Issues and Options Consultation: Local Plan to 2036 (November 2017)

2.38 The new Local Plan Issues and Options document[1] was published by the Council for consultation purposes in November 2017. Chapter 7 of the consultation document considered 'our economy' and posed a question on the proposed approach to meeting future retail needs. Information on this question and the response to them can be found in chapter 4 of the topic paper.

2.39 The consultation document was accompanied by a Draft Schedule of Site Appraisals – October 2017[2]. This document undertook a simple appraisal of a number of greenfield housing sites that had been promoted to the Council leading up to the consultation. No sites were promoted for retail development. The consultation also included a Call for Sites exercise which provided a further opportunity for landowners to promote their sites for housing and other development.

2.40 Both the consultation document and the Draft Schedule of Site Appraisals were subject to separate Sustainability Appraisals[3] [4].

(g) Other Local Strategies

2.41 The Council has produced the following local strategies and guidance relevant to planning for retailing and other town centre uses:

- Maylands Masterplan (2007)
- Heart of Maylands Development Brief (2010)
- Hemel Hempstead Town Centre Masterplan 2011-2031 (2013)
- Shaping the future of Dacorum: Our Growth and Infrastructure Strategy to 2050

Maylands Master Plan[5]

2.42 Detailed guidance on the future planning of the Maylands Business Park can be found in the Maylands Master Plan (adopted by the Council as a planning policy statement, June 2007). Section 2.3 in the masterplan proposed that the Heart of Maylands will become the functional centre of Maylands, providing shops, cafes, restaurants, business services, community facilities, open space and access to public transport.

[1] http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/new-single-local-plan
[2] http://www.dacorum.gov.uk/docs/default-source/strategic-planning/schedule-of-site-appraisals-draft---october-2017.pdf?sfvrsn=85af339e_8
[3] http://www.dacorum.gov.uk/docs/default-source/strategic-planning/dacorum-issues-and-options-sa-working-note---october-2017.pdf?sfvrsn=66ad339e_4
[4] http://www.dacorum.gov.uk/docs/default-source/strategic-planning/dacorum-schedule-of-site-appraisals-sa-working-note---october-2017.pdf?sfvrsn=2ad339e_4
[5] http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/supplementary-planning-documents-(spds)

Heart of Maylands Development Brief[6]

2.43 Proposals for the area around the Heart of Maylands area (Maylands Avenue/Wood Lane End junction) were set out in the development brief, which was adopted by the Council in October 2010. The brief's aim was for the Heart of Maylands to become a strong functional centre for the businesses and employees working in Maylands Business Park. It proposed shops, cafés, restaurants, business services, community facilities, open space and access to public transport in a high quality built environment.

Hemel Hempstead Town Centre Masterplan[7]

2.44 The masterplan was adopted by the Council in January 2013 and became a supplementary planning document in September of that year, when the Core Strategy was adopted. Chapter 3 in the masterplan outlines the aims, objectives and principles, chapter 4 sets the town centre vision and chapter 5 presents the strategies for each of the town centre character zones. More detailed guidance on the Gade Zone was provided in the Gade Zone Planning Statement (April 2012).

Shaping the future of Dacorum: Our Growth and Infrastructure Strategy to 2050

2.45 The Sustainable Community Strategy ("Destination Dacorum") was published in 2012 and set out visions for the Borough to 2031. It helped develop the visions in the Core Strategy. This visioning is now provided by the "Shaping the future of Dacorum: Our Growth and Infrastructure Strategy to 2050"[8]. The Strategy has informed the early stages of developing the spatial objectives for the new Local Plan. It outlines the long term visions for the Borough to 2050, guides how the Council can meet the challenges and opportunities of future growth, and covers six overarching themes:

- Building Dacorum's future homes for everyone.
- Generating a vibrant economy with opportunities for all.
- A happier, healthier and safer Dacorum.
- Creating a clean, green and attractive Dacorum.
- On-track for a better transport network.
- Harnessing the opportunity of technology and digital connectivity

2.46 The Growth and Infrastructure Strategy sets out key challenges, proposals and related visions under each theme. It also explains how the Council will work with the local community and key partner organisations to deliver the proposals and visions.

[6] http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/supplementary-planning-documents-(spds)

[7] http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/supplementary-planning-documents-(spds)

[8] http://www.dacorum.gov.uk/docs/default-source/strategic-planning/dacorum-growth-and-infratstructure-strategy-to-2050.pdf

2.47 The strategy is clear that the main driver of change is the accelerated delivery of new housing and that this will be a central component in the strategy for Dacorum's future. Key points in relation to town centres include:

- Acknowledging completion of major urban-realm improvements and a new bus interchange under the Hemel Evolution programme in Hemel Hempstead town centre.
- Pointing out the successful awarding of a Business Improvement District (BID) for Hemel Hempstead town centre.
- Highlighting work on delivering a new multi-storey town centre car park in Berkhamsted.
- Recognising that a flourishing economy is vital to regenerating and improving town centres and ensuring that they are attractive places to live, work, shop, and visit.
- Supporting regeneration of the Hemel Hempstead town centre and the Two Waters Area.
- Improving the quality and variety of attractions available, including the retail and leisure facilities in Dacorum's town centres, to attract more visitors to the Borough.
- Identifying the need for town centres to be more flexible and to broaden their offer, particularly in terms of helping them to facilitate more social interaction, provide meeting places, sustain the leisure economy, and deliver high quality new housing there.
- Maximising the use of digital connectivity in the town centres.
- Planning for 1,800 new homes in Hemel Hempstead town centre.

3. EVIDENCE BASE

3.1 The Dacorum Local Plan (2020-2038) Emerging Strategy for Growth's policies on retailing and other town centres uses have been developed in the light of the Council's monitoring system and two key evidence base studies which are summarised below.

(a) Dacorum's Monitoring System

3.2 The Council has a well-developed monitoring system which the County Council helps support. This allows us to carry out regular monitoring of land development and publish annual land position statements and Borough wide monitoring reports[9].

3.3 We prepare, on an annual basis, our Authority Monitoring Report (AMR). The AMR uses information from the various sources to provide a more detailed overview of the success of Local Plan policies and the progress of new development. Due to the need to progress the draft Local Plan in recent years, the latest published AMR covers the period 2016/17. However, better progress has been made with the employment position statements, which include information on retail completions and commitments. Therefore, this topic paper relies on more recent monitoring information.

3.4 Our current monitoring reveals that the main retail commitments are:

- Gossoms End/Billet Lane, Berkhamsted: permission (4/02607/17/ROC) granted for a foodstore for Lidl (1,025 sq m net).

- Jarman Park, Hemel Hempstead: permission (4/00595/18/MFA) granted for a retail park (10,730 sq m gross).

- Aviva Site, Maylands Avenue, Hemel Hempstead: planning permission (4/03157/16/MFA) exists for a retail park. Phase 1, including an Aldi store, has been completed. Phase 2 is not expected to be built, as the land has been sold and planning permission granted for warehousing development.

- Marlowes Shopping Centre, Hemel Hempstead: planning permission (4/01183/19/MFA) granted for refurbishment, involving a re-distribution of floorspace from retail to leisure, including a new cinema and restaurants, resulting in a net loss of 9,610 sq m gross retail floorspace.

(b) Main Evidence Base Studies

3.5 The main evidence base for the Council's retail and town centres policies in the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth consists of two studies produced by Nexus Planning:

[9] http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/monitoring-reports-and-land-position-statements

- **South West Hertfordshire Retail and Leisure Study (2018):** this joint study provided Dacorum, Hertsmere, St Albans, Three Rivers and Watford councils with an understanding of existing retail and leisure provision, and an objective assessment of future needs and possible strategic responses.

- **Further Dacorum Retail Study (2020):** this study updated the retail aspects of the 2018 study to take account of changed circumstances, including greater clarity on the scale and location of future housing development and revised forecasts of future retail expenditure. It also provided advice on potential sites for retail development.

(c) Evidence Base – Key Messages

3.6 The South West Hertfordshire Retail and Leisure Study and Further Dacorum Retail Study provided evidence on a number of matters including:

- Assessment of centres
- Major proposals in nearby centres
- Hierarchy of centres
- Capacity for future retail floorspace
- Appraisal of potential future retail development sites
- Potential distribution of capacity
- Out of centre retail locations
- Leisure uses
- Town centre boundaries
- Review of current retail and town centre policies, including frontage policies
- The need for monitoring and updating

3.7 The main points arising from these studies are summarised below, while a fuller explanation is given in Appendix 1.

Assessment of centres

3.8 Chapter 4 in the 2018 Retail and Leisure Study analysed the vitality and viability of the key centres, including Hemel Hempstead, Berkhamsted and Tring town centres in Dacorum. A ‘health check’ was carried out. This showed that Dacorum’s town centres performed well against most indicators.

3.9 Each centre in South West Hertfordshire functioned quite differently and key relevant points are noted below:

- Watford, Hemel Hempstead and St Albans were the largest centres in South West Hertfordshire and the major comparison retail centres.

- Berkhamsted functioned independently as a main centre, providing a combination of convenience and comparison goods, as well as services.

- Tring functioned as a particularly localised centre, focused around services rather than comparison or convenience goods for local residents.

Major proposals in nearby centres

3.10 The 2018 study referred to two proposed schemes outside South West Hertfordshire, of a nature and scale which could draw increased trade away from the area:

- Brent Cross, London: planning permission granted for over 82,000 sq. metres of class A1-A5 floorspace and 14,000 sq. metres of D2 space.

- Newlands Road, Luton (M1 Junction 10): planning application submitted (now approved) for mixed use development, with around 70,000 sq. metres of retail and leisure space, including up to 37,000 sq. metres of comparison retail floorspace.

Hierarchy of centres

3.11 The 2018 study recommended a revised hierarchy, based on the characteristics associated with different tiers in the hierarchy. It identified Hemel Hempstead as a sub-regional centre, Berkhamsted and Tring as town centres, Hemel Hempstead Old Town as a district centre and seven local centres. Scope was also identified to raise Apsley from local to district centre status, by including the adjoining retail parks.

Capacity for future retail floorspace

3.12 The revised forecasts in the 2020 study reflected various assumptions, including estimated increases in population, retail expenditure and internet shopping, existing commitments for retail development and the likely inflow from the proposed housing development at East and North Hemel Hempstead in St Albans District.

3.13 The floorspace capacity calculations indicated a substantial headroom for additional convenience floorspace. However, there was no capacity for additional comparison (non-food) floorspace. Indeed, there was a small forecast surplus, even at 2036. The terms ‘capacity’, ‘comparison goods’ and ‘convenience goods’ are defined in Appendix 1, paragraph 18 below.

3.14 The results of the forecasts are summarised below:

Goods	**Floorspace capacity (sq. metres net)**	
	2032	**2036**
Convenience	13,300 to 16,500	15,800 to 19,500
Comparison	-4,400 to -5,900	-300 to -400

3.15 The 2020 study recommended that the Council should place the greatest weight on the forecasts to 2032. This reflects the guidance in NPPF paragraph 85 that planning policies should allocate a range of suitable sites in town centres, to meet the scale and type of development likely to be needed, looking at least ten years ahead.

3.16 The retail studies also advised that capacity does not equate to need and forecasting as far away as 2032 and 2036 must be treated with caution. Out of centre schemes harmful to designated centres should be resisted, irrespective of the capacity identified. However, appropriate schemes that would increase the vitality and viability of existing centres should be permitted, even if there is no capacity identified.

Appraisal of potential future retail development sites

3.17 The 2020 study assessed eight sites in Hemel Hempstead, Berkhamsted and Tring. It was concluded that the most appropriate sites are the following two town centre sites:

- Market Square, Hemel Hempstead
- High Street/Brook Street, Tring

Potential distribution of capacity

3.18 The 2020 study advised as follows on how future retail development might be distributed across the Borough:

Location	Potential retail development
Hemel Hempstead	Market Square site – consider for mixed use retail/ leisure development (large convenience store or smaller comparison units and convenience store). The East and North Hemel Hempstead strategic sites should be the main location for retail development outside of the town centre, with a large new foodstore (c. 5,000 sq m net) in a district centre in North Hemel Hempstead and new local centres.
Berkhamsted	A large new foodstore (c. 3,000 sq m net), in addition to the permitted Lidl store, could be supported by 2036. However, allocating a site is not advocated at present as it might harm the town centre. The potential for such a store should be rigorously impact tested before 2026. In the meantime, the Council should provide for a small local centre on the South/East Berkhamsted strategic site.

Tring	Convenience goods floorspace (up to 2,200 sq m net) could be provided for. The High Street (Forge Car Park)/Brook Street site in the town centre might be a suitable site. If not, there is scope for a foodstore outside of the town centre - ideally on the Tring strategic site, perhaps as part of a new district/local centre. It may also be appropriate to designate a small local centre on the strategic site for everyday needs.

Out of centre retail locations

3.19 Jarman Park in Hemel Hempstead is an existing out of centre retail and leisure location and vacant land there is allocated for additional retail development. Planning permission has been granted for a retail park. This permission is unlikely to be implemented, but proposals for a discount supermarket are anticipated.

3.20 The 2020 study suggested that the Council might be comfortable in releasing the residual area at Jarman Park from use for retail purposes when the Local Plan is next reviewed. However, the report recommended market-testing in the mid 2020's to ensure there is no latent demand for retail floorspace which cannot otherwise reasonably be met in Hemel Hempstead town centre.

3.21 Also, the 2020 study concluded that there is not much justification for new out of centre sites. The reasons for this conclusion included the general 'town centres first' policy, the availability of town centres sites and potential new local and neighbourhood centres to accommodate most of the identified capacity, and the forecast lack of expenditure capacity for significant new comparison goods floorspace in the Borough.

Leisure uses

3.22 The 2018 study considered:

- Indoor sports and health and fitness
- Cinemas
- Restaurants
- Bars, pubs, social clubs and nightclubs
- Ten pin bowling
- Bingo
- Theatres, galleries and museums

3.23 It was concluded that existing provision plus commitments were sufficient to meet most of the identified future needs. Therefore, the study recommended that there was no need to allocate land for specific major new leisure facilities over the plan period. Nevertheless, additional facilities should be permitted in sustainable locations. Also, the loss of existing facilities should be resisted, if it would reduce choice in a sector with long-term demand.

Town centre boundaries and frontages

3.24 The NPPF (2012 edition) defined:

- Town centre
- Primary shopping area
- Primary frontages
- Secondary frontages

3.25 The 2018 study noted that the 2018 NPPF removed the requirement to designate primary and secondary frontages. Nevertheless, the study retained recommended primary and secondary frontages and stated that they may still represent a valid reference point for future policy making.

3.26 For Dacorum's town centres, the 2018 study defined recommended town and primary shopping area boundaries and primary and secondary frontages. For Hemel Hempstead Old Town, just the boundary of the centre and the primary shopping area were defined.

Review of current retail and town centre policies, including frontage policies

3.27 The 2018 study reviewed current retail and town centre policies in South West Hertfordshire, including frontage policies. It assessed whether they were fit for purpose under the current planning policy regime and in the context of the study's recommendations.

3.28 The consultants were also mindful of emerging policy guidance, especially the revised NPPF (July 2018). As this was only available as a pre-consultation draft at the time of writing, the study was not amended to accord with its revisions. However, the Councils were recommended to conduct a policy review again, closer to the time of adopting their Local Plans.

The need for monitoring and updating

3.29 Paragraph 5.3 in the 2020 study advised that:

> "…this is an unprecedented period of change for our town centres and retail in general. There have been significant economic shifts in recent years, and the current Covid-19 situation will have consequences which will not fully be understood until a point in the future. The likelihood is that there will be some re-basing of consumer spending patterns, but it is not possible to accurately forecast those at the present time. It will therefore be important for Dacorum to closely monitor, and regularly update, the position on capacity, need and strategy in the coming years.

4. CONSULTATION AND ENGAGEMENT

4.1 This section of the topic paper explains what consultation and engagement the Council has undertaken and the responses it has received at each stage.

(a) Dacorum Local Plan: Issues and Options consultation (Regulation 18) (November 2017)

4.2 The Council undertook an Issues and Options consultation during November-December 2017, to help inform and develop the Local Plan. In order to secure more meaningful responses the consultation document presented a full and detailed set of policy options, particularly in respect of housing growth and distribution.

4.3 This section of the document provides a brief summary of the main issues arising from that stage and the responses to these. The Council received a total of 22,708 responses to 46 questions from 2,376 individuals and organisations. A full summary of the consultation material and the responses are available from the Council's website[10].

4.4 Section 7.5 in the consultation document addressed the following issue:

Issue 15 – What additional retail development is required and where should this be?

Paragraphs 7.4.9-7.4.11 set out our proposed approach. The main point to note is that no conclusions were reached in the consultation document on whether any new proposals for retail development should be included in the new Local Plan. This was because the South West Hertfordshire Retail and Leisure Study was underway and the study's recommendations would help shape our final decisions.

4.5 Section 7.5 concluded by posing the following question:

Question 23 – Do you agree with the proposed approach to meeting future retail needs?

This was the only question in the consultation document relating to retail and town centres.

4.6 There were 273 responses to Question 23 and 58% of respondents answered 'yes'. Appendix 2 contains a summary table of the response to this question.

4.7 The main points made in the response to Question 23 in the Issues and Options document can be summarised as follows:

- Retail development should be concentrated in town and local centres, not in out of centre locations.

[10] http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/new-single-local-plan

- Existing centres should be enhanced, for example, through environmental improvements and measures to encourage travel to centres by bus, cycling and walking.

- A wide range of complementary uses should be permitted in town centres.

- The increase in internet shopping should be taken into account.

- New retail facilities to meet local needs should be included in major new developments, but these facilities should not cause harm to existing centres.

4.8 The policies proposed in the new Local Plan accord with all these points. However, the Plan is not able to respond to the responses about the proposed Lidl store at Gossoms End, Berkhamsted. This is because this store has already been granted planning permission. Also, the existing buildings have been demolished, so the permission is technically regarded as being implemented and cannot lapse.

(b) Stakeholder consultation

4.9 The South West Hertfordshire Retail and Leisure Study (2018) (see section 3 above) states in paragraphs 4.11 and 4.12 that stakeholder engagement was undertaken as part of the part of the health check assessments of the main centres. The aim was to understand the local context, including issues and concerns affecting local residents and businesses. This involved discussions with local retailers, representation groups and members. In Dacorum, this was carried out via email.

4.10 The engagement covered the vitality and viability of the centres, vacancies, mix of retail, parking, street environment, accessibility, crime and security and town centre events. Feedback and responses are summarised in the health check assessments (Appendix C to the Retail and Leisure Study).

4.11 The stakeholder feedback for Dacorum's town centres is shown below:

Hemel Hempstead
No stakeholder responses were received for Hemel Hempstead.
Berkhamsted
No stakeholder responses were received for Berkhamsted.
Tring
A particularly good response was received from stakeholders representing Tring. Responses were received from Tring Town Council, I Love Tring Retail Group and Tring Together.

Responses suggested that Tring was currently fulfilling its role as a town centre with a strong mix of units. The vibrancy of the high street and plethora of independent retailers throughout the centre was noted as a particular positive.

The evening economy was noted to be particularly good and the town centre was considered to have a good mix of units. There were lots of community run events attracting visitors to the Town Centre throughout the year.

Street lighting was highlighted as an area for improvement although in general street furniture was considered to be well maintained. Dolphin Square was considered to be outdated and in poor condition compared to the rest of the town centre. The pavements are also particularly narrow and noted to be in poor condition. Connections to the train station were considered to be very poor.

(c) Internal Workshops

4.12 The Strategic Planning team undertook a series of internal workshops with the Council's development management and property teams. This provided an opportunity to test evolving approaches to policy and potential allocations. The work has helped to shape and refine the emerging plan. It has delivered a range of revisions that take into account recommendations and address concerns and issues raised.

(d) Task and Finish Group Meetings

4.13 Officers have been working closely with the Local Plan Task and Finish Group. This is a cross party panel of Members that has provided both high level guidance and detailed scrutiny of the emerging plan, its policies and proposals. As with the internal workshops discussed above, the feedback helped the Council refine the scope of, and broad approaches to retail policies and proposals.

(e) Duty to Cooperate/Cross Boundary Matters

4.14 The Duty to Cooperate (DtC) is an ongoing process, and we will need to demonstrate that this has been satisfied as a legal requirements by the time the Local Plan is submitted for Examination.

4.15 The Council has been working with nearby authorities and other organisations under the requirements of the DtC. These discussions have focussed on strategic matters that affect more than one authority and include unmet housing, as well as employment and infrastructure needs across the South West Hertfordshire authorities grouping (Dacorum, St. Albans, Watford, Three Rivers and Hertsmere). Engagement is continuing, but substantial alignment has been reached with many organisations on a range of issues. Consequentially, we have started to prepare Statements of Common Ground / Memoranda of Understanding with these organisations, which have in turn informed the Local Plan Emerging Strategy for Growth consultation document.

4.16 We will continue these collaborative and positive discussions alongside the preparation of the Local Plan and the conclusions reached will be incorporated into the final Local Plan, where appropriate.

5. KEY ISSUES

5.1 This chapter examines the key issues relating to retail and town centres for the new Local Plan.

<u>Issue 1: How should the hierarchy of centres be defined?</u>

5.2 Core Strategy Table 5 defines the existing retail hierarchy. Also, Core Strategy Policy CS5 (shops and commerce) seeks to strengthen the main retail hierarchy of town centres and local centres, with most retail development being directed these centres (see paragraphs 2.27 and 2.28 above).

5.3 The South West Hertfordshire Retail and Leisure Study (2018) recommended a revised hierarchy of centres (see paragraphs 12 -16 in Appendix 1 below). Nexus Planning gave the Council a clear recommendation in the 2018 study on how each centre should be classified in the hierarchy, except for Apsley.

5.4 The 2018 study showed Apsley as a local centre in the hierarchy. However, paragraph 4.66 in the study commented that there would be scope to elevate Apsley to district centre status if Apsley local centre is connected, in policy terms, with the adjoining retail parks (see paragraph 16 in Appendix 1 below).

5.5 Apsley functions as far more than just a local centre serving the nearby residential area. It also includes various uses that serve a much wider area:

- Specialist shops (e.g. the stamps and coins shop).
- A range of restaurants and public houses.
- Other facilities such as Lincoln House Surgery.
- Out of centre retail locations.

5.6 There is scope for linked trips to these different uses. Indeed, the following out of centre retail locations in London Road adjoin Apsley local centre, as defined on the 2004 Local Plan Proposals Map:

- Apsley Mills Retail Park (including Sainsbury's)
- Dunelm and Wickes
- London Road Retail Park (Halfords, Pets at Home, McDonalds and the former Office Outlet).

5.7 In view of the above, the Council considers that Apsley should be elevated to district centre status.

Issue 1: conclusion

5.8 The Council concludes that the hierarchy of centres in the new Local Plan should be as recommended in the 2018 study, except that Apsley should be classified as a district centre. Policy SP6 in the Local Plan Emerging Strategy for Growth consultation document includes a hierarchy which reflects this conclusion.

Issue 2: What is the capacity for additional retail floorspace in Dacorum?

5.9 Revised estimates of the capacity for additional convenience and comparison floorspace in Dacorum over the period to 2036 were set out in the Further Dacorum Retail Study, 2020 (see paragraphs 17-27 in Appendix 1 below). The estimates are summarised in the table below:

Goods	Floorspace capacity (sq. metres net)	
	2032	2036
Convenience	13,300 to 16,500	15,800 to 19,500
Comparison	-4,400 to -5,900	-300 to -400

5.10 It is also important to note that the 2020 study advised that:

- The Council should place the greatest weight on the forecasts to 2032.

- Capacity does not equate to need and forecasts to 2032 and 2036 must be treated with caution. Harmful out of centre schemes should be resisted, irrespective of the capacity identified, whilst appropriate schemes in existing centres should be permitted, even if there is no capacity identified.

- Although there was a substantial capacity for additional convenience floorspace, 62% of this stemmed from the assumption that current 'over-trading' at supermarkets could be re-distributed. Therefore, and as there was no significant evidence of widespread discontent with existing provision, it was not essential to meet the quantitative convenience capacity in full. Instead, the assessment of need should be balanced with qualitative judgements, based on local circumstance.

- There is no quantitative need for additional comparison floorspace. However, this did not preclude beneficial comparison goods floorspace in town centre locations or in planned district centres in large urban extensions. Also, proposals for the loss of existing comparison units should be resisted unless there is clear evidence that they are unsuitable and/or unviable for continuing retail occupation.

5.11 Another key point is that the 2020 study stressed that this is an unprecedented period of change for our town centres and retail in general. In particular, the current Covid-19 situation will probably result in changes to consumer spending patterns, but it was too soon to make an accurate forecast. Since the completion of the 2020 study, the pandemic has continued to affect the retail market, resulting in a rapid increase in internet shopping and many shop closures.

5.12 A final point to make is that the calculations in the 2020 study were based on the assumption that the new Local Plan would propose an additional 1,025 homes a year in Dacorum, 2018-2036. In fact, the Local Plan Emerging Strategy for Growth consultation document proposes 922 homes a year between 2020 and 2038. The consultation document also proposes a slightly different distribution of housing across the Borough from that which informed the retail study. Further changes to the housing numbers and distribution may be made in the publication version of the

Local Plan, particularly if the Government revises its standard method for calculating local housing need again.

5.13 Despite the above, it seems unlikely that any changes to the housing numbers or distribution in the published Local Plan will make a great difference to the capacity for additional retail floorspace. This conclusion is in line with the finding in the 2020 study, that there is only a fairly modest difference in the capacity figures between the low, central and high scenarios (see paragraph 25 in Appendix 1 below).

Issue 2: conclusion

5.14 In the light of the above, the Council concludes that there is:

- A substantial need for additional convenience floorspace in the Borough, although it is not necessary to provide for the quantitative capacity in full. Rather, it is better to concentrate on meeting the main identified needs in our town centres and strategic housing sites.

- No quantitative need for any additional comparison floorspace, but appropriate schemes should be encouraged in the town centres and small-scale provision in the strategic housing sites.

- Uncertainty about the capacity forecasts, particularly due to the impact of Covid-19 and the possibility that the housing numbers and distribution in the Local Plan may change again. The Council will seek advice from the retail study consultants on this matter before publishing the Local Plan.

<u>Issue 3: Which sites should be proposed for retail development in the Local Plan?</u>

5.15 The Further Dacorum Retail Study (2020) carried out an appraisal of potential future retail development sites. It also provided advice on the potential distribution of capacity and considered the case for additional out of centre retail development (see paragraphs 28-34 in Appendix 1 below). The study recommended that development should be concentrated in the town centres as far as possible, with the most suitable sites being Market Square in Hemel Hempstead and High Street/Brook Street in Tring. Before the Local Plan is published, the Council will give further consideration to the likely scale and type of retail development that might be delivered on these sites.

5.16 In addition, the 2020 study recommended that some retail development should be located on the large strategic sites. Another conclusion was that there was no justification for new out of centre retail sites. However, the existing out of centre retail allocation at Jarman Park could be retained, but the need for it should be reconsidered when the Local Plan is next reviewed.

5.17 The Council considers that the recommendations in the 2020 study should be followed, apart from some variation in respect of the Berkhamsted and Tring strategic sites, as explained below:

- Berkhamsted: the study recommended a small local centre on the South/East Berkhamsted strategic site. The Council has decided not to propose development at East Berkhamsted and the South Berkhamsted site on its own may be too small to support a local centre. Nevertheless, it is considered that South Berkhamsted should be provided with a community hub, which would contain a small retail element including a convenience store.

- Tring: the study stated that it may be appropriate to designate a small local centre in the strategic site for everyday needs, with a new foodstore (if not accommodated in the town centre) forming part of an additional, larger, district centre. The Council considers that Dunsley Farm is the best site for a new foodstore if it cannot be delivered on the High Street/Brook Street site in the town centre. However, the Council does not favour a district centre at Dunsley Farm, as it might compete with the town centre. The Council also considers that a retail component is needed on the East of Tring strategic site, but feels that a neighbourhood centre should be proposed rather than a local centre, given the site's size.

Issue 3: conclusion

5.18 In view of the above, the Local Plan Emerging Strategy for Growth consultation document includes site specific proposals for retail development, as shown in the table below. The consultation document refers to the site specific proposals as 'growth areas'.

Growth area	Location	Allocated for
Hemel Hempstead town centre		
HH05	Market Square	Mixed use development, including "Retail led mixed use development including a supermarket or local convenience store and other town centre uses at ground floor level."
Hemel Hempstead strategic sites		
HH01, HH02	North Hemel	Housing led development, including "A range of new retail and community facilities in the Hemel North Growth Area (sites HH01 and HH02), involving a new district or local centre with a medium or large supermarket and also smaller scale local or neighbourhood centres to serve day-to-day needs."
Hemel Hempstead out of centre		
HH27	Jarman Park	• Retail led development, including a possible foodstore. • Food and drink uses, leisure uses and a hotel also acceptable on part of the site.

		• The sale and display of clothing and footwear is not acceptable, unless ancillary to the main use of an individual unit.
Berkhamsted town centre		
No suitable, viable and available site.		
Berkhamsted committed site		
Bk13	Gossoms End/Billet Lane (Lidl)	New foodstore at ground floor level (housing above).
Berkhamsted strategic sites		
Bk01	Land South of Berkhamsted	Housing led development, including a community hub.
Tring town centre		
Tr06	High Street / Brook Street	Retail led development, including a medium or large supermarket. Other proposed uses include food and drink, and leisure uses.
Tring strategic sites		
Tr01	Dunsley Farm, Tring	Mixed use development, including "A supermarket will be encouraged within the General Employment Area, but only if a supermarket cannot be delivered in Tring town centre on the High Street/Brook Street site (Growth Area Tr06) and it would not have a significant adverse impact on the town centre."
Tr03	East of Tring	Housing led development with a neighbourhood centre to include a sports/community hub.

Issue 4: What approach should the Local Plan take towards out of centre retail development?

5.19 Core Strategy Policy CS16 (shops and commerce) states that outside defined centres, retail development will be permitted only if it is acceptable in terms of the sequential approach and impact assessment. Paragraphs 13.7 and 13.8 in the Core Strategy provide further guidance on out of centre retail development.

5.20 Table 1 in the Site Allocations Development Plan Document shows Dacorum's out of centre retail locations and the main uses that will be permitted at each location. This table superseded Table 6 in the Core Strategy. The Site Allocations document also contains a 'Schedule of Retail Proposals and Sites'. The vacant 2 ha. site at Jarman Park is site S/1 in the schedule and retail and leisure development is proposed there.

5.21 Chapter 6 in the Further Dacorum Retail Study (2020) asked two questions:

- Should Jarman Park be retained for retail purposes?
- Are any new out of centre retail sites justified?

5.22 The 2020 study concluded with regard to these questions (see paragraphs 32-34 in Appendix 1 below) that:

- The Council might be comfortable in releasing the residual area at Jarman Park from use for retail purposes when the Local Plan is next reviewed. However, before then, there should be a period of market-testing in the mid 2020's, to ensure there is no latent demand for retail floorspace which cannot otherwise reasonably be met in Hemel Hempstead town centre.

- There is not much justification for new out of centre retail sites for a number of reasons. The reasons include the general 'town centres first' policy and the availability of town centres sites and potential new local and neighbourhood centres which can accommodate most of the identified capacity.

Issue 4: conclusion

5.23 The Council accepts Nexus Planning's recommendations and concludes that a generally restrictive approach should be taken towards out of centre retail development in the new Local Plan. Therefore, Policy DM21 (main town centre uses outside existing centres) in the Local Plan Emerging Strategy for Growth consultation document states that proposals will be subject to the sequential test and an impact assessment. The policy also states that where retail development is permitted, careful control will be exercised over the size of units and type of goods sold, in order to avoid a significant adverse impact on existing centres.

5.24 The table below summarises the Council's approach towards out of centre retail locations in the Site Allocations document and the Local Plan consultation document. Column 2 in the table shows the main uses proposed in the Site Allocations. Column 3 indicates the relevant policies and proposals in the Local Plan Emerging Strategy for Growth consultation document. Apart from referring to Policy DM21, column 3 also takes account of other proposals in the consultation document, including classifying Apsley as a district centre (incorporating some out of centre retail locations) and proposing housing on the B&Q site in Two Waters.

Location	Main uses proposed in Site Allocations	Policies and proposals in Local Plan consultation document
Hemel Hempstead		
Sainsbury, Apsley Mills Retail Park, London Road	Food retailing	Included in Apsley district centre, so subject to Policy DM19 (mix of uses in town, district and local centres).

Remainder of Apsley Mills Retail Park, London Road	Bulky, non-food goods	As above.
London Road Retail Park, Two Waters (includes Halfords and Pets at Home)	Bulky, non-food goods	As above.
Dunelm and Wickes, London Road	Bulky, non-food goods	As above.
B&Q, Two Waters Road	Bulky, non-food goods	Redevelopment for housing proposed (Growth Area HH11).
London Road/Two Waters Road (Aldi)	Food retailing	Subject to Policy DM21 (main town centre uses outside existing centres).
Jarman Park, Hemel Hempstead	Food retailing and bulky non-food goods*. Leisure uses	Retail led development proposed on vacant site (Growth Area HH27).
Aldi, Redbourn Road, Hemel Hempstead	-	Subject to Policy DM21 (main town centre uses outside existing centres).
Maylands Retail Park (including Aldi), Hemel Hempstead	-	Included in Maylands local centre, so subject to Policy DM19 (mix of uses in town, district and local centres).
Berkhamsted		
Gossoms End / Billet Lane	Food retailing	Foodstore and housing development proposed (Growth Area Bk13).
Tring		
Tesco, London Road	Food retailing	Subject to Policy DM21 (main town centre uses outside existing centres).

* Excluding clothing and footwear unless ancillary to the main use of a unit.

5.25 Finally, it should be noted that a new out of centre location may be established on the Dunsley Farm site in Tring. However, this will be the case only if a new foodstore cannot be delivered on the High Street/Brook Street site in the town centre (see the examination of Issue 3 above).

<u>Issue 5: Should the Local Plan propose any additional leisure uses?</u>

5.26 The South West Hertfordshire Retail and Leisure Study (2018) carried out a sector-by-sector analysis of a range of leisure uses, such as cinemas, restaurants and theatres, galleries and museums (see paragraphs 35-37 in Appendix 1 below).

5.27 It was concluded in the 2018 study that existing leisure provision plus commitments were sufficient to meet most of the identified future needs. Therefore, the study recommended that there was no need to allocate land for specific major new leisure facilities over the plan period. Nevertheless, the study advised that additional facilities should be permitted in sustainable locations. Also, the loss of existing facilities should be resisted, if it would reduce choice in a sector with long-term demand.

Issue 5: conclusion

5.28 The Council accepts the recommendations in the 2018 study, so policies have been included in the Local Plan Emerging Strategy for Growth consultation document to encourage leisure uses in appropriate places.

5.29 Policy SP6 (delivering the retail and leisure strategy) in the consultation document states that the Council will support retail and leisure development. The ways it will do this include:

- Encouraging main town centre uses of an appropriate scale and nature in the town, district and local centres, in accordance with the hierarchy set out in the policy.

- Supporting the evening economies within the town centres.

5.30 Policy DM19 (mix of uses in town, district and local centres) provides more detailed guidance on where different uses, including leisure uses, will be permitted (see Issue 7 below for further information).

5.31 Some of the site specific proposals in the Local Plan consultation document encourage leisure uses. For example, the proposals for Growth Areas HH05 (Market Square, Hemel Hempstead), HH27 (Jarman Park, Hemel Hempstead) and Tr06 (High Street/Brook Street, Tring) – see the table in paragraph 5.18 above.

Issue 6: What boundaries should be defined in Dacorum's centres?

(i) Town and district centres

5.32 Town centre boundaries for Hemel Hempstead, Berkhamsted and Tring are defined currently on the Dacorum Borough Local Plan 1991-2011 Proposals Map (now called the Policies Map). In 2013, a revised boundary for Hemel Hempstead town centre was included in the Core Strategy (Figure 21) and the Hemel Hempstead Town Centre Masterplan.

5.33 Dacorum's development plan documents do not use the term 'primary shopping area'. However, Policy SA7 in the Site Allocations document states that:

> "Each town centre contains a key shopping area which comprises:
> (a) Primary frontage; and
> (b) Secondary frontage
> as shown on the Policies Map."

5.34 The 'key shopping areas' are not shown on the Policies Map, just the primary and secondary frontages.

5.35 Saved Local Plan Policy 43 (policy 43 shopping areas in local centres) states that each local centre contains a shopping area. The policy shows the addresses of properties within the shopping areas and the boundaries are shown on the Policies Map.

5.36 Appendix F in the South West Hertfordshire Retail and Leisure Study (2018) put forward recommended boundaries for town and district centres and for primary shopping areas in these centres (see paragraphs 38-42 in Appendix 1 below). Boundaries were proposed for Hemel Hempstead, Berkhamsted and Tring town centres, and Hemel Hempstead Old Town.

5.37 In Dacorum, the most significant recommended boundary change proposed in the 2018 study was to classify Hemel Hempstead town centre and Hemel Hempstead Old Town as two separate centres. This is because the Old Town has a different role to the town centre, offering speciality shopping such as antique and gift shops, whilst also providing a strong food offer. Therefore, the study recommended that the Old Town should be classified as a district centre.

Town and district centres - conclusion

5.38 The Council agrees with the boundaries recommended in the 2018 study, subject to some fine tuning of the town centre boundaries to ensure that they follow landownership boundaries.

5.39 No boundaries were proposed for Apsley in the 2018 study, as the study recommended that it be classified as a local centre, although it added that it could be elevated to district centre status. For the reasons stated in paragraphs 5.4-5.7 above, the Council considers that Apsley should be ranked as a district centre. This means that it is necessary to define a boundary around the centre and a primary shopping area.

5.40 The Council's proposed boundaries for Apsley are shown on the draft Proposals Map which accompanies the Local Plan Emerging Strategy for Growth consultation document. Our approach to setting these boundaries is described below:

- Primary shopping area: this covers the older shops along London Road and the adjoining out of centre retail locations.

- District centre boundary: this covers the primary shopping area and also other land that functions or potentially could function as part of the district centre, including Frogmore Mill, the Durrants Hill Road car park, the Mercedes car dealership in London Road and Lincoln House Surgery.

(ii) Local centres

5.41 Proposed boundaries for the local centres were not included in the 2018 study. Therefore, the Council has reviewed the existing boundaries shown on the Policies Map and considers that some of the boundaries are too tightly drawn. This is because certain uses that function as part of some centres, for example Bennetts End and Kings Langley, are outside of the defined local centre. Such uses include libraries, medical centres, public houses, churches and community centres. The Council's view is that such uses should be included within the local centre boundary.

5.42 Proposed new local centre boundaries are not shown on the draft Proposals Map accompanying the Local Plan consultation document. However, the Council intends to make appropriate boundary changes at the publication stage of the Local Plan.

5.43 Although the retail hierarchy in the Core Strategy classifies the Heart of Maylands as a local centre, there is no defined boundary for this centre. Therefore, the new Local Plan needs to establish a Maylands local centre boundary. A proposed boundary is shown on the draft Proposals Map and this boundary encompasses:

- The new Maylands Plaza development
- Maylands Retail Park phase 1, comprising Aldi, McDonalds and Costa
- Nuffield Health
- The older shops and commercial uses on the west side of Maylands Avenue and in Duxons Turn, Wood Lane End (west of Maylands Avenue) and the southern part of Mark Road

(iii) Neighbourhood centres

5.44 The 2018 study did not recommend boundaries for the neighbourhood centres. However, all the proposed neighbourhood centres are classified as local centres at present, so they have existing boundaries which are shown on the Policies Map.

5.45 As with the proposed local centres, the Council considers that some of the boundaries of the neighbourhood centres should be amended. Highfield (Bellgate) and Nash Mills are examples of neighbourhood centres where the Council considers that extensions to the existing boundaries are justified. No boundary changes are shown on the draft Policies Map, but the Council intends to make appropriate changes when the Local Plan is published.

<u>Issue 7: Should the Local Plan include any primary and secondary frontages?</u>

5.46 The Council's current approach is described below:

- Town centres: Site Allocations Policy SA7 defines primary and secondary frontages in Hemel Hempstead, Berkhamsted and Tring town centres.

- Local centres: saved Local Plan Policy 43 defines 'shopping areas' in each local centre.

5.47 Appendix F in the South West Hertfordshire Retail and Leisure Study (2018) noted that the 2018 NPPF removed the requirement to designate primary and secondary frontages Nevertheless, Appendix F recommended revised primary and secondary frontages for the town centre. It also stated that these frontages may still represent a valid reference point for future policy making.

5.48 Although the NPPF no longer refers to primary and secondary frontages, paragraph 001 in the PPG on town centres and retail states that:

"Planning policies are expected to define the extent of primary shopping areas. Authorities may, where appropriate, also wish to define primary and secondary retail frontages where their use can be justified in supporting the vitality and viability of particular centres."

5.49 However, an important recent change of circumstances has been the Government's changes to the General Permitted Development Order and Use Classes Order (see paragraphs 2.16-2.21 above). Of particular relevance is the introduction of the new Class E (commercial, business and service use). Most shops (formerly Class A1) are now within Class E, together with various other town centre uses, such as financial/professional services, food and drink uses, some health uses and certain leisure uses.

5.50 Changes of use from one type of Class E use to another can take place without the need for planning permission. This means that it is no longer realistic for local planning authorities to operate primary and secondary frontage policies, as they are now unable to control the proportion of retail uses in any particular frontage.

5.51 It should also be noted that planning authorities cannot use Article 4 directions to require that planning permission is obtained for changes of use within a particular use class. This is because Article 4 directions can be used only to control changes of use from one use class to another. Therefore, they cannot be used to control changes from shops to other uses within Class E.

Issue 7: conclusion

5.52 In view of the changes to the Use Classes Order, the Local Plan Emerging Strategy for Growth consultation document does not include any primary and secondary frontages in the town centres. Nor does it retain the local centre primary shopping areas from saved Local Plan Policy 43.

Issue 8: What mix of uses is appropriate in town, district, local and neighbourhood centres?

5.53 The Council's current approach regarding the mix of uses in centres is contained in two policies:

- Site Allocations Policy SA7 (shopping areas in town centres)
- Saved Local Plan Policy 43 (shopping areas in local centres)

5.54 Paragraph 5.10 in the Site Allocations Development Plan Document stresses the importance of retaining active frontages at ground floor level in key shopping areas, in order to enhance the vitality and vibrancy of town centres. Given this context, Site Allocations Policy SA7 states that:

- In primary frontages, uses permitted (under the Use Classes Order 1987) at ground floor level are A1 (shops), A3 (restaurants and cafes) and D2 (assembly and leisure).

- In secondary frontages, the same uses are permitted at ground floor level as in the primary frontages and also A2 (financial and professional services), A4 (drinking establishments), A5 (hot food takeaways) and D1 (non-residential institutions).

5.55 Saved Local Plan Policy 43 from the Dacorum Borough Local Plan 1991-2011 dates from an era when policies concentrated on retaining shops, rather than encouraging a vibrant mix of active uses. The policy stipulates that:

- Local centres with shopping areas with less than 8 shops - permission will not be granted for the loss of shops at street level.

- Local centres with larger shopping areas - the loss of shops will not be permitted at street level, unless points (a)-(c) in the policy are met. Amongst other things, the policy requires that at least 60% of the frontage is retained in shop use and that an appropriate range of local shops remains.

5.56 The South West Hertfordshire Retail and Leisure Study (2018) reviewed current retail and town centre policies in South West Hertfordshire, including frontage policies (see paragraphs 43-45 in Appendix 1 below). In the 2018 study, Nexus Planning took account of Government guidance (including the 2014 PPG on ensuring the vitality of town centres) and the study's findings. Nexus were also mindful of emerging policy guidance, especially the revised NPPF (July 2018). Therefore, the study recommended the Councils to conduct a policy review again, closer to the time of adopting their Local Plans.

5.57 The following extract from the 2018 study summarised the broad way that policies should change, to reflect Government guidance and trends in town centres:

> " In order to ensure the centre's ability to adapt to future changes, it is advised that the current retail policies are replaced with more flexible wording. For example, each assessed centre could benefit from a policy that aims to retain a certain threshold A1 uses in the Primary Shopping Area, yet allows, as an exception, other town centre uses (as defined by the NPPF) where these would not have a significant adverse impact on the role and function of the centre in question assessed against a set list of criteria. In our experience, this is a policy approach that is increasingly being adopted by Local Planning Authorities for their respective town centres."

5.58 Equally relevant to Issue 8 as to Issue 7 is what paragraphs 5.49 and 5.50 above say about the importance of the Government's changes to the General Permitted Development Order and Use Classes Order. Of particularly relevance is the introduction of the new Class E (commercial, business and service use). Also significant for neighbourhood centres is the new Class F.2 (local community use). This class includes a "shop not more than 280sqm mostly selling essential goods, including food and at least 1km from another similar shop".

Issue 8: conclusion

5.59 The Council recognises that the nature of centres is changing and that they will contain a wider range of non-shop uses than in the past. In particular, there will be more emphasis on food and drink and leisure uses, and a growing evening economy. Substantial housing development in and around Hemel Hempstead town centre is likely to increase the demand for such uses. However, shopping will remain very important, especially in the primary shopping areas.

5.60 Therefore, Policy DM19 (mix of uses in town, district and local centres) in the Local Plan Emerging Strategy for Growth consultation document encourages a wide range of 'main town centre' uses. This is important in order to protect the vitality and viability of Dacorum's key centres. The policy also states that development in the primary shopping areas and in existing shopping areas in local centres should provide an active ground floor frontage.

5.61 Point 5 in Policy DM19 provides guidance on the appropriate mix of uses in town, district and local centres. It states that:

- At ground floor level in primary shopping areas, shops, financial and professional services, cafes and restaurants, gyms, bars and pubs, and hot food takeaways will be permitted.

- These uses and a wide range of other uses will be permitted in upper floors in primary shopping areas, elsewhere in town and district centres, and in local centres.

5.62 Neighbourhood centres are not classified as 'centres' in the NPPF and they contain a smaller range of uses than the larger centres. Nevertheless, neighbourhood centres fulfil an important role in providing local shops, services and community facilities, which merit protection where appropriate.

5.63 Policy DM20 (neighbourhood centres and scattered local shops) in the Local Plan consultation document places the emphasis on shops to serve the local community, mainly selling convenience goods. The policy also encourages other appropriate uses such as small scale food and drink uses and local community uses. Some protection is given in Policy DM20 to shops within class F.2, other shops and premises providing local services and some community facilities in neighbourhood centres.

Issue 9: What should the Local Plan say about hotel development?

5.64 The Council's current approach towards hotel development is provided by the following saved policies in the Dacorum Borough Local Plan 1991-2011:

- Policy 91 (hotels and guest houses in towns and large villages)
- Policy 92 (hotels and guest houses in the Green Belt and the Rural Area)

5.65 Saved Policy 91 states that:

> "…As a general guide, large hotels will be appropriate in, or next to town centres and, where acceptable under employment policies, in general employment areas."

However, hotels are not encouraged in most general employment areas under saved Local Plan Policy 31 and Site Allocations Policy SA5.

5.66 Saved Policy 92 states that in the Green Belt, permission will not be given for new buildings to provide hotel and guest house accommodation. In the Rural Area, however, there may be limited opportunities for small scale new development. There is greater flexibility in both the Green Belt and Rural Area for conversion of existing buildings to hotel use.

5.67 Hotels are classified as a 'town centre use' in the NPPF, but they were not covered in the South West Hertfordshire Retail and Leisure Study (2018) or the Further Dacorum Retail Study (2020). Nevertheless, it is clear that Dacorum has a good range of hotel accommodation and there is no indication of high demand for additional provision. Planning permission has been granted for:

- 30 additional hotel bedrooms and other facilities at Shendish Manor, Hemel Hempstead.
- A 78 bedroom hotel at 47 Maylands Avenue, Hemel Hempstead, but it seems that this permission is unlikely to be implemented.

Issue 9: conclusion

5.68 The Council concludes that there is no need to allocate sites purely for hotel development. However, the Local Plan should encourage hotel development in appropriate locations. Therefore, the Local Plan Emerging Strategy for Growth consultation document contains the following relevant policies and proposals:

- Policy DM18 (tourism) – this policy does not mention hotels, but it encourages appropriate tourism development.

- Policy DM19 (mix of uses in town, district and local centres) – hotels are amongst the uses that will be permitted in upper floors in primary shopping areas, elsewhere in town and district centres, and in local centres.

- Policy DM16 (general employment areas) – hotels will be permitted in general employment areas if proposals comply with point 2 in the policy.

- The site specific proposals for Growth Areas HH08 (Station Gateway, Hemel Hempstead) and HH27 (Jarman Park, Hemel Hempstead) refer to a hotel as a possible use as part of the overall mix of uses.

6. CONCLUSIONS

6.1 This Topic Paper has been prepared against a marked period of change and readjustment for our established shopping centres since the previous Local Plan. No longer are these centres the main focus for retailing activity, as habits have changed with the continuing rise of internet shopping. Furthermore, matters have worsened with the current Covid-19 pandemic and economic recession. These factors bring greater uncertainty in terms of predicting future change, planning for our existing shopping centres and identifying potential new opportunities to meet future growth.

6.2 Nevertheless, the Topic Paper demonstrates that the Council has followed the requirements of Government planning policy in assessing future retail floorspace needs and town centre uses in the Local Plan Emerging Strategy for Growth consultation document. The topic paper has taken into account the outcome of the evidence base and consultation to date, in developing its approach to future retailing and ensuring town centre uses remain flexible to change.

6.3 Chapter 5 in the topic paper examined the key issues relating to retail and own centre uses for the new Local Plan. The conclusions from this examination has informed some site specific proposals and the following policies in the Local Plan consultation document:

- Policy SP6 (delivering the retail and leisure strategy)
- Policy DM19 (mix of uses in town, district and local centres)
- Policy DM20 (neighbourhood centres and scattered local shops)
- Policy DM21 (main town centre uses outside existing centres)

6.4 Given the above, the Council considers that the policy approach it has adopted in the consultation document in terms of meeting development needs, safeguarding our hierarchy of centres, allowing flexibility of uses in these centres and controlling opportunities outside of these centres is in accordance with the requirements of the NPPF and PPG.

6.5 However, as the Plan is progressed we are mindful of the need to keep under review the impacts of Covid-19 on our policies and proposals.

APPENDICES

APPENDIX 1: EVIDENCE BASE – KEY MESSAGES

1. The main evidence base for the Council's retail and town centres policies in the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth consists of two studies produced by Nexus Planning:

   - **South West Hertfordshire Retail and Leisure Study (2018):** this study provided Dacorum, Hertsmere, St Albans, Three Rivers and Watford councils with an understanding of existing retail and leisure provision, and an objective assessment of future needs and possible strategic responses.

   - **Further Dacorum Retail Study (2020):** this study updated the retail aspects of the 2018 study to take account of changed circumstances, including greater clarity on the scale and location of future housing development and revised forecasts of future retail expenditure. It also provided advice on potential sites for retail development.

2. The main points arising from these studies are summarised below.

Assessment of centres

3. Chapter 4 in the South West Hertfordshire Retail and Leisure Study (2018) analysed the vitality and viability of the key centres, including Hemel Hempstead, Berkhamsted and Tring town centres in Dacorum.

4. A 'health check' of the key centres was carried out and the results can be found in Appendix C to the 2018 study. In the health check, Nexus Planning used the following indicators taken from the former PPG on 'Ensuring the vitality of town centres' (note: these indicators and additional indicators are now in the PPG on 'Town centres and retail'):

   - Diversity of uses
   - Proportion of vacant street level property
   - Commercial yields on non-domestic property
   - Customers' views and behaviour
   - Retailer representation and intentions to change representation
   - Commercial rents
   - Pedestrian flows
   - Accessibility
   - Perceptions of safety and occurrence of crime

5. The health check assessments included stakeholder engagement with local representatives, to understand the local context, including issues and concerns affecting local residents and businesses. This involved discussions with local retailers, representation groups and members and was carried out via email. No response was received from stakeholders in Hemel Hempstead and Berkhamsted, but there was a good response from Tring (see paragraph 4.11 in this topic paper).
6. South West Hertfordshire's principal centres were ranked in the 2018 study, based on the Javelin Venuescore UK Shopping Venue Rankings 2015/16. Javelin graded

towns and major shopping centres, using a scoring system which took into account the presence of multiple retailers in each location. Independent operators were not covered, so centres with a high proportion of such traders, for example Tring, were given a low ranking. Each centre was also given a market position classification that reflected whether it had a high-end or discount focus.

7. The results of the Javelin rankings for Dacorum's town centres are summarised below:

Centre	Classification	Rank	Market position classification
Hemel Hempstead	Regional	163	Middle
Berkhamsted	District	659	Upper middle
Tring	Local	3,152	Middle

8. The health check assessment of each centre included looking at the diversity of uses. This showed that:

- Hemel Hempstead and Berkhamsted had a high proportion of comparison goods units.

- Hemel Hempstead had very few restaurants and cafes, whilst Tring and Berkhamsted had a particularly strong leisure services offer.

- Over 10% of the units in Hemel Hempstead town centre were vacant, perhaps due to the impending changes at the Marlowes Shopping Centre. Berkhamsted and Tring had very few vacant units.

9. In conclusion, the health checks showed that Dacorum's town centres performed well against most indicators. There was also evidence of recent public and private investment in most centres, environmental quality was generally high, and the household survey results indicated a general satisfaction with the quantity and quality of town centre uses.

10. Each centre in South West Hertfordshire functioned quite differently and key relevant points are noted below:

- Watford, Hemel Hempstead and St Albans were the largest centres in South West Hertfordshire and the major comparison retail centres.

- Berkhamsted functioned independently as a main centres, providing a combination of convenience and comparison goods, as well as services.

- Tring functioned as a particularly localised centre, focused around services rather than comparison or convenience goods for local residents.

<u>Major proposals in nearby centres</u>

11. Nexus Planning contacted neighbouring local planning authorities to identify future capacity and pipeline schemes within competing centres (see paragraphs 4.75-

4.105 in the 2018 study). There were two schemes of a nature and scale which could increase trade draw away from South West Hertfordshire:

- Brent Cross, London: planning permission has been granted for over 82,000 sq. metres of class A1-A5 floorspace and 14,000 sq. metres of D2 space.

- Newlands Road, Luton (M1 Junction 10): a planning application had been submitted (now approved) for mixed use development, with around 70,000 sq. metres of retail and leisure space, including up to 37,000 sq. metres of comparison retail floorspace.

Hierarchy of centres

12. The 2018 study recommended a revised hierarchy, based on the characteristics associated with the following tiers in the hierarchy:

    - Regional centres
    - Sub-Regional centres
    - Major Town centres
    - Town centres
    - District centres
    - Local centres

13. The definition of the hierarchy was based on a detailed assessment of market shares, as well as the size of the centre (i.e. number of units and floorspace) and composition of each centre (i.e. the range of facilities present). This provided Nexus Planning with an understanding of the reach of each centre in convenience, comparison and leisure terms. Whilst the consultants did not assess certain town centre uses such as hotels and offices, they were mindful of their presence in each centre.

14. Major centres were considered in paragraphs 9.30-9.39 and local and neighbourhood centres in paragraphs 4.58-4.66 of the 2018 study. The recommended hierarchy was also informed by the assessment of centres in chapter 4 of the 2018 study and the health checks in Appendix C with regard to major centres and by Appendix J for local and neighbourhood centres.

15. The table below shows the consultants' recommended hierarchy of centres in Dacorum (see Tables 4.14 and 9.7 in the 2018 study) and describes the role of the different types of centre:

Type of centre	Centre	Role of centre
Sub-regional centre	Hemel Hempstead	A business and commercial hub, with a major offer of convenience and comparison floorspace, and services. Serves a wider area than the immediate catchment. Provides a comprehensive offer of leisure

		floorspace including restaurants, cafes, bars and cinemas.
Town centre	Berkhamsted Tring	Commercial hub serving the local area with convenience and comparison floorspace, a comprehensive provision of services and an offer of leisure floorspace including restaurants and cafes.
District centre	Hemel Hempstead Old Town	Provides the local catchment with important convenience and comparison floorspace and local services. Usually between 50 and 100 units. Important local hub for the surrounding residential community.
Local centre	Apsley Adeyfield Bennetts End Woodhall Farm Bovingdon Kings Langley Markyate	Includes a range of shops and services, limited community services (e.g. health centre, community centre) and some leisure services such as restaurants, cafes and takeaways. Generally has a dominant supermarket and consists of 15-40 units (or fewer, if it provides an important local function, or has a supermarket that dominates the wider local area).
Neighbourhood centre	Boxmoor Chaulden Gadebridge Grovehill Highfield (Bellgate) Highfield (The Heights) Leverstock Green Nash Mills Warners End Miswell Lane (and Western Road), Tring Markyate Northchurch	Generally provide a range of small shops and services of a particularly localised nature for day-to-day needs, serving a smaller area than a local centre. Typically contain 3-14 units.

16. With regard to Apsley's position in the hierarchy, paragraph 4.66 in the 2018 study advised that:

> "Apsley consists of approximately 35 retail units in a typical high street arrangement. The centre provides a range of shops and services, many of which serve a much wider area, and therefore the centre would typically fall into the local centre category. There are however, six out-of-centre retail destinations located in close proximity to the local centre area…An important

relationship exists between Apsley local centre and the adjoining out of centre retail parks (Sainsbury's, Apsley Mills Retail Park, remainder of Apsley Mills Retail Park, Two Waters Retail Park, and Dunelm and Wickes, London Road). In policy terms, it is considered that there would be scope to elevate Apsley to District Centre status where Apsley local centre is connected, in policy terms, with the adjoining retail parks. If this were the case, Apsley would consist of more than 40 units, would serve a variety of functions, and would serve a similar role in the wider area to other designated District Centres."

Capacity for future retail floorspace

17. The 2018 study estimated the capacity for additional convenience and comparison floorspace in each of the South West Hertfordshire districts over the period to 2036. Revised calculations for Dacorum were set out in chapter 2 of the 2020 study and conclusions in chapter 5.

18. In the 2018 study, the terms 'capacity', 'comparison goods' and 'convenience goods' were defined as follows:

Capacity: forecast resident spending within the catchment area, with which to support existing and additional retail floorspace

Comparison goods: retail items not bought on a frequent basis, for example televisions and white goods (fridges, dishwashers etc.)

Convenience goods: everyday essential items, such as food

19. The calculations in the 2020 study were based on various assumptions, including estimated increases in population, retail expenditure and internet shopping. In particular, it should be noted that the study assumed:

- An additional 1,025 homes per annum in Dacorum 2018-2036, in accordance with the Government's initial standard method for calculating local housing need. The study also tested high and low population scenarios (1,250 and 800 homes).

- A total of 18,450 homes in Dacorum over the 2018-2036 period, including around 11,100 in Hemel Hempstead, 2,900 in Berkhamsted and 2,700 in Tring.

- Special forms of trading (largely, the internet) were assumed to capture an increasing proportion of retail sales over the period to 2036, as shown below:

Goods	2017	2036
Convenience	3.5%	6.7%
Comparison	15.6%	25.5%

20. The 2020 study's capacity calculations also reflected the guidance in NPPF paragraph 85. This states that planning policies should allocate a range of suitable

sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Therefore, the 2020 study estimated floorspace capacity in 2032 (ten years after proposed adoption of new Dacorum Local Plan), as well as other years including 2036. Indeed, paragraph 2.27 in the 2020 study recommended the Council to place the greatest weight on the forecasts to 2032.

21. Chapter 3 in the 2020 study assessed the likely additional retail expenditure in Dacorum arising from proposed large-scale housing development at East and North Hemel Hempstead in St Albans District. This analysis suggested that the added inflow from St Albans would generate capacity for:

- 400-500 sq m net convenience goods floorspace and 1,000-1,200 sq m net comparison goods floorspace in Dacorum at 2032.

- 500-600 sq m net convenience goods floorspace and 1,000-1,400 sq m net comparison goods floorspace in Dacorum at 2036.

22. Another factor in the capacity calculations was commitments for retail development. Paragraph 2.18 in the 2020 study considered the main commitments and took a view on which schemes were likely to be implemented.

23. Figures 3.1 and 3.2 in the 2020 study showed the total forecast retail capacities, including the added inflow from St Albans. These figures indicated a substantial capacity for additional convenience floorspace. However, there was no capacity for additional comparison (non-food) floorspace. Indeed, there was a small forecast surplus, even at 2036.

24. The information from Figures 3.1 and 3.2 is summarised below:

Goods	**Floorspace capacity (sq. metres net)**	
	2032	**2036**
Convenience	13,300 to 16,500	15,800 to 19,500
Comparison	-4,400 to -5,900	-300 to -400

25. With the high and low growth scenarios referred to in paragraph 18 above, the results of the calculations were not greatly different from that shown in paragraph 24. In broad terms:

- Convenience floorspace: the high scenario increased the floorspace capacity by about 1,500-2,000 sq. metres at 2032 and 2,000-2,500 sq. metres at 2036. The low scenario reduced the figures by a similar amount.

- Comparison floorspace: the high scenario increased the floorspace capacity by about 400 sq. metres at 2032 and 500 sq. metres at 2036. The low scenario reduced the figures by a similar amount.

26. Paragraphs 5.8-5.11 in the 2020 study referred back to some qualitative findings of the 2018 study that were still relevant, including that:

- Dacorum Borough had the largest retention of convenience goods in South West Hertfordshire (93%), with some very popular foodstores which trade at well above company averages.

- The Borough retained a respectable 64% of all comparison goods spending.

- The majority of any future capacity should be directed towards supporting the emerging urban extensions to the three main towns.

- Capacity does not equate to need and forecasting as far away as 2032 and 2036 must be treated with caution. Out of centre schemes harmful to designated centres should be resisted, irrespective of the capacity identified. However, appropriate schemes that would increase the vitality and viability of existing centres should be permitted, even if there is no capacity identified.

27. Paragraphs 5.12-5.18 in the 2020 study contained some further relevant guidance:

- As the forecasts showed no future capacity for comparison goods, the report did not advocate any allocations for non-central additional comparison floorspace. Importantly though, this did not preclude beneficial comparison goods floorspace in town centre locations or in planned district centres in large urban extensions.

- The Council should protect its existing important comparison goods retail floorspace, to ensure there is a stock of retail floorspace capable of meeting future demand. Any proposals for the loss of existing comparison floorspace should be considered on a case-by-case basis, especially in central locations. The loss of such units should be resisted unless there is clear evidence that they are unsuitable and/or unviable for continuing retail occupation.

- Turning to convenience goods, 62% of the quantitative capacity for additional floorspace stemmed from the assumption that current over-trading at supermarkets (i.e. trading above company averages) could be re-distributed, with the remaining 38% of capacity arising from general population and expenditure growth.

- Given the extent of over-trading and as there was no significant evidence of widespread discontent with existing provision, the report did not consider it essential to meet the quantitative convenience capacity in full. Instead, it considered that the assessment of need should be balanced with qualitative judgements, based on local circumstance (see paragraph 26 above).

Appraisal of potential future retail development sites

28. Chapter 4 in 2020 study included a high level appraisal of six sites in Hemel Hempstead town centre and one each in Berkhamsted and Tring town centres. The purpose was to assess their suitability for allocation as potential retail sites in the emerging local plan. The conclusions from this appraisal are summarised below:

Site	Summary of assessment
Civic Centre, Hemel Hempstead	EDGE OF CENTRE The site may be appropriate for convenience retail, but not for comparison retail.
West Herts College Site (part of Site Allocations proposal MU/1), Hemel Hempstead	EDGE OF CENTRE The site may be appropriate for convenience retail, but not for comparison retail.
Hospital Site (north west), Hemel Hempstead	EDGE OF CENTRE The site is not appropriate for retail development.
Market Square (including former bus station), Hemel Hempstead	TOWN CENTRE There is opportunity for both convenience and comparison retail.
Paradise/ Wood Lane, Hemel Hempstead	EDGE OF CENTRE The site is not appropriate for retail development.
Two Waters Road, Hemel Hempstead	OUT OF TOWN CENTRE The redevelopment of the B&Q part of the site could be considered for retail development, but its out of centre location is unfavourable.
Water Lane (rear of Tesco), Berkhamsted	TOWN CENTRE LOCATION The site may be appropriate for some form of retail development, but its configuration and size restricts opportunities.
High Street (Forge Car park)/ Brook Street, Tring	TOWN CENTRE There is opportunity for both convenience and comparison retail.

29. It was concluded that the most appropriate locations for retail development are the following town centre sites:

- Market Square, Hemel Hempstead
- High Street/Brook Street, Tring

<u>Potential distribution of capacity</u>

30. Paragraph 5.19 in the 2020 study put forward recommendations on the potential distribution of retail capacity on a zone by zone basis. These recommendations are summarised below:

Zone	Summary of recommendations
Hemel Hempstead	The Market Square site in the town centre should be considered for allocation for mixed use retail and leisure floorspace. Development might involve a large convenience store (1,000-3,000 sq m), or smaller comparison units (totalling 800-2,000 sq m) and a local convenience store (200-700 sq m). Additional retail provision outside the town centre should mainly be at the North and East Hemel Hempstead strategic sites. Comparison goods floorspace should provide for everyday local needs, in local and neighbourhood centres. There are greater opportunities for convenience goods floorspace, in or near the strategic sites. New foodstores could be supported by 2032. Apart from the permitted Jarman Park foodstore, there is scope for new foodstores in North Hemel Hempstead (Dacorum) and East Hemel Hempstead (St Albans District). The North Hemel Hempstead foodstore could be large (net sales area around 5,000 sq m). The planned 5,500 homes in Dacorum at North Hemel Hempstead could support two or three local centres, with the larger foodstore forming part of a district centre.
Berkhamsted	The Waitrose store is performing very well and a Lild store at Gossoms End has been approved. However, the addition of some 3,000 dwellings by 2036 would support a third foodstore of c. 3,000 sq m net. There is great uncertainty over securing another town centre foodstore, but a large new store elsewhere (perhaps in the South/East Berkhamsted strategic site) might harm the town centre's vitality and viability. The Council is not recommended to allocate a large new foodstore at present. Instead, as over 80% of Berkhamsted's housing growth is forecast for 2026-2036, the potential for a further large foodstore should be rigorously impact tested nearer to that time. In the meantime, the Council should provide for a small local centre on the South/East Berkhamsted strategic site.
Tring	The existing Tesco store significantly over-trades and there may be an additional 2,700 homes at Tring by 2036. Therefore, convenience goods floorspace of up to 2,200 sq m net could be provided for.

	The High Street (Forge Car Park)/Brook Street site in the town centre might be suitable for retail development – the Council should clarify the development potential there. If the town centre site is shown not to be feasible, there is scope for a foodstore outside the town centre. This would ideally be on the Tring strategic site, perhaps as part of a new district/local centre. It may be appropriate to designate a small local centre in the strategic site for everyday needs, with a new foodstore forming part of an additional, larger, district centre.
Bovingdon (including Markyate)	Future needs are likely to be met through piecemeal appropriate development and it is not necessary to allocate any specific sites.
Kings Langley	Accept organic growth and small-scale extension of existing centres, if there is market demand.

<u>Out of centre retail locations</u>

31. Chapter 6 in the 2020 study addressed two questions:

- Should Jarman Park be retained for retail purposes?
- Are any new out of centre retail sites justified?

32. Jarman Park in Hemel Hempstead is an existing out of centre retail and leisure location. The Site Allocations document (2017) allocated vacant land there for retail development. Planning permission has been granted for a retail park of over 10,000 sq. metres gross floorspace on the vacant land, including a foodstore. The retail park scheme is unlikely to be implemented, but proposals for a discount foodstore are anticipated.

33. Paragraph 6.8 in the 2020 study suggested that:

> " …the Council might be comfortable in releasing the residual area at Jarman Park from use for retail purposes when the Local Plan is next reviewed. However, we would recommend that a period of market-testing be put in place in the mid 2020's to ensure that there is no latent demand for retail floorspace which cannot otherwise reasonably be met in Hemel Hempstead Town Centre. This exercise could be carried out as part of the Retail Study accompanying the next Local Plan review."

34. Paragraphs 6.9-6.11 in the 2020 study considered whether any new out of centre retail sites are justified. The report concluded that there is not much justification for such sites given the following points:

- Because of the general ‘town centres first’ policy and as there are available town centres sites and potential new local and neighbourhood centres, able to accommodate most of the identified capacity.

- Even if identified capacity cannot be met in designated centres, edge and out of centre sites should not automatically be promoted. Instead, decisions should reflect the outcome of the sequential test and impact assessment, as per the NPPF.

- The extant permissions for out of centre retail development at Jarman Park and Maylands Park do not seem attractive to the current retail market. This indicates a lack of significant latent market demand for new retail space which cannot be met in existing centres or new local and neighbourhood centres.

- There is unlikely to be any expenditure capacity for significant new comparison goods floorspace in the Borough, even by 2036.

Leisure uses

35. Chapter 8 of the 2018 study considered:

- Indoor sports and health and fitness
- Cinemas
- Restaurants
- Bars, pubs, social clubs and nightclubs
- Ten pin bowling
- Bingo
- Theatres, galleries and museums

36.The key points arising from a sector-by-sector analysis are set out below:

Health and fitness

- The current provision of fitness facilities in South West Hertfordshire is slightly above the existing demand. However, by 2036 there may some demand for additional facilities.

- The area has a particularly strong representation of larger publicly owned leisure complexes, including sports centres in Hemel Hempstead, Berkhamsted and Tring.

- The increasing trend of smaller ‘budget gyms’ also contributes to the high number of gyms in the area.

- We would not recommend that the Councils plan for any further facilities at this time. Notwithstanding this, and in keeping with NPPF policy on encouraging healthy activities, the Councils should assess the principle of new health and fitness developments coming forward on their own merits.

Cinemas

- South West Hertfordshire had 34 cinema screens and 4,984 seats, including Cineworld at Jarman Park, Hemel Hempstead with 17 screens and 1,788 seats.

- A benchmarking exercise indicated that the area can support over 6,200 seats now, rising to 7,200-8,100 in 2036.

- New multi-screen cinemas were proposed in Watford and Hemel Hempstead town centre (9 screen cinema with 784 seats in the Marlowes Centre).

- These schemes will bring the total number of cinema seats in the area to 7,300.

- Taking into consideration the part time cinema screens in the area, as well as nearby cinemas in Harrow and Hatfield, the existing and planned 7,300 seats is likely to meet the demand for cinema trips during the plan period.

Ten pin bowling

- There is currently just one ten-pin bowling facility in South West Hertfordshire, Hollywood Bowl at Woodside Leisure Park in Watford, with 26 lanes.

- Based on the assumed benchmark, the area could support around 50-56 lanes in 2036.

- However, current trends show that demand is consistently falling. As such, new developments cannot be planned for through Local Plan allocations due to the variability of the market.

- There are also a number of nearby venues outside South West Hertfordshire.

- Therefore, we would not recommend that the Councils plan for any further facilities at this time, but any planning applications should be considered on their merits, noting the latent spending capacity across the area.

Restaurants, Bars and Cafés

- We assessed the potential capacity for additional food and beverage floorspace over the plan period across key centres in South West Hertfordshire. The assessment utilised current market shares, population and spending growth rates and benchmarking against current levels of provision.

- In the low population growth scenario, existing floorspace exceeded estimated demand. For Dacorum, the 'excess' floorspace was nearly 1,300 sq. metres.

- However, additional floorspace can be supported with the high population growth scenario. For Dacorum, the potential additional floorspace is some 2,650 sq. metres, located mainly in Hemel Hempstead (1,540 sq. metres) and Berkhamsted (650 sq. metres).

- This is not a prescriptive exercise and we do not recommend that any centre requires large-scale allocations to meet the identified capacity.

- Restaurants, cafés and bars are an essential function of healthy town centres, drawing residents to the area, increasing 'dwell time' and supporting the evening economy. They should be promoted, unless they would adversely impact the operation or function of existing retail provision and the vitality and viability of the town centres.

Theatres, Concert Halls, Museums and Art Galleries

- With 23 main cultural facilities identified across the study area, there was a strong representation of theatres, museums and art galleys across South West Hertfordshire.

- Dacorum had five facilities, including the Old Town Hall Theatre, Hemel Hempstead and the Natural History Museum in Tring.

- In addition, the household survey results illustrated that Central London was by far the most popular destination for cultural facilities. This reflected the strong transport links London and the capital's international draw.

- Taking this into account, we do not consider there to be demand for additional cultural facilities across the area during the plan period.

37. It was concluded that existing leisure provision plus commitments were sufficient to meet most of the identified future needs. Therefore, the study recommended that there was no need to allocate land for specific major new leisure facilities over the plan period. Nevertheless, additional facilities should be permitted in sustainable locations. Also, the loss of existing facilities should be resisted, if it would reduce choice in a sector with long-term demand.

<u>Town centre boundaries and frontages</u>

38. Paragraph 9.40 in the 2018 study set out key definitions from the NPPF (2012), as follows:

- **Town centre** - an area defined on the local authority's proposal map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area.

References to town centres or centres apply to city centres, town centres, district centres and local centres.

- **Primary shopping area** – a defined area where retail development is concentrated (generally comprising the primary and those secondary frontages which are adjoining and closely related to the primary shopping frontage).

- **Primary frontages -** likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods.

- **Secondary frontages -** provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses.

39. Paragraph 9.41 then referred to the study's conclusions on town centre boundaries in Appendix F. This appendix noted that the 2018 NPPF removed the requirement to designate primary and secondary frontages Nevertheless, the study retained recommended primary and secondary frontages and Appendix F stated that they may still represent a valid reference point for future policy making.

40. A table suggesting boundaries for town centres and primary shopping areas, and the extent of primary and secondary frontages, was included in Appendix F. There is also a plan for each centre, showing the recommended boundaries and frontages.

41. In Dacorum, the most significant recommended boundary change was to classify Hemel Hempstead town centre and Hemel Hempstead Old Town as two separate centres. This is because the Old Town has a different role to the town centre, offering speciality shopping such as antique and gift shops, whilst also providing a strong food offer. Therefore, the study recommended that the Old Town should be classified as a district centre.

42. For Dacorum's town centres, Appendix F defined recommended town and primary shopping area boundaries, and primary and secondary frontages. For Hemel Hempstead Old Town, just the boundary of the centre and the primary shopping area were defined. This was in order to give a greater level of flexibility of units within the Old Town's primary shopping area, thus strengthening the vitality and viability of the centre.

Review of current retail and town centre policies, including frontage policies

43. The 2018 study reviewed current retail and town centre policies in South West Hertfordshire, including frontage policies. It assessed whether they were fit for purpose under the current planning policy regime and in the context of the study's recommendations. The consultants' recommendations were set out at Appendix I to the 2018 study.

44. Paragraphs 9.100 and 9.101 in the 2018 study described the context for the policy recommendations. In formulating their recommendations, Nexus Planning took account of the NPPF (2012 edition), the 2014 PPG on 'Ensuring the vitality of town

centres' and the study's findings. The consultants were also mindful of emerging policy guidance, especially the revised NPPF (July 2018). This was available only as a pre-consultation draft at the time of writing and the study was not amended to accord with its revisions. However, the Councils were recommended to conduct a policy review again, closer to the time of adopting their Local Plans.

45. The following extract from Appendix F in the 2018 study summarises the broad way that policies should change, to reflect Government guidance and trends in town centres:

> " In order to ensure the centre's ability to adapt to future changes, it is advised that the current retail policies are replaced with more flexible wording. For example, each assessed centre could benefit from a policy that aims to retain a certain threshold A1 uses in the Primary Shopping Area, yet allows, as an exception, other town centre uses (as defined by the NPPF) where these would not have a significant adverse impact on the role and function of the centre in question assessed against a set list of criteria. In our experience, this is a policy approach that is increasingly being adopted by Local Planning Authorities for their respective town centres."

<u>The need for monitoring and updating</u>

46. Paragraph 5.3 in the 2020 study advised that:

> "…this is an unprecedented period of change for our town centres and retail in general. There have been significant economic shifts in recent years, and the current Covid-19 situation will have consequences which will not fully be understood until a point in the future. The likelihood is that there will be some re-basing of consumer spending patterns, but it is not possible to accurately forecast those at the present time. It will therefore be important for Dacorum to closely monitor, and regularly update, the position on capacity, need and strategy in the coming years."

APPENDIX 2: SUMMARY OF RESPONSE TO ISSUES AND OPTIONS CONSULTATION DOCUMENT (QUESTION 23)

Duty to co-operate bodies	Answer to question	Main points made
Chilterns Conservation Board	Yes	Changing technology and delivery systems are likely to mean a reduced need for large format retail floorspace. Flexible approaches such as co-location of village services (shop/post office/pub/cafe/delivery point) may help retain facilities in rural areas.
Hertfordshire County Council (Environment Department)	No	We support the policy approach to focus retail in town and local centres and avoid out-of-town or out-of-centre locations. Convenience retail and other services should be provided in new development. Retail provision needs to be planned so that the need to travel is reduced. Maintaining the vitality of local centres which people can walk or cycle to and town centres so that people do not have to travel to neighbouring towns is important for this reason.
Historic England	No	The historic environment's role in the economy, providing opportunities for growth and reinforcing local character should be recognised. New retail sites should be sustainably located and avoid harm to heritage assets and their settings. Town and local centres should be enhanced and carefully managed. Increased diversity of uses of uses in town centres can benefit the historic environment, giving a more active and vibrant centre. Out of town retail provision can have a negative impact on the vitality and viability of town and local centres, with adverse effects for the historic environment (e.g. vacant units, dilapidated buildings and public realm etc.).
Local organisations		

Berkhamsted Citizens	Yes	1. Agree retail development should be focused on Berkhamsted town centre to retain economic viability and character of this thriving market town. 2. Proposed Lidl store at Gossoms End will extend retail centre along valley floor - is likely to result in saturation of supermarket provision in the town, while causing major congestion and pollution. 3. Additional supermarkets in the centre or at 'local centres' should be discouraged if the vitality of the town as a community centre is to be continued. 4. Viability of 'local centres' must be proven before any acceptance as part of a development plan for any site.
Berkhamsted Residents' Action Group	Yes, but	As Berkhamsted Citizens Association (see above).
Berkhamsted Town Council	Yes	As points 1 and 4 in Berkhamsted Citizens Association's response (see above).
Grove Fields Residents Association (Tring)	No	Most future retail should be met in the principal town centre of Hemel Hempstead. The secondary town centres of Berkhamsted and Tring should be improved, with limited retail development if it supports and enhances the existing centres in a way that overcomes infrastructure concerns (including parking and the transport network).
Markyate Parish Council	No	There is only so much demand for products like food, yet more and more shops being opened e.g. two Aldi in Hemel Hempstead. Some must fail. Out of town centre outlets normally mean access by cars not buses. Can town centre sites be made more attractive to big chains?
Northchurch Parish Council	Yes, but	We agree that retail development should be focused on Berkhamsted town centre to retain the economic viability and character of this thriving market town which will also directly benefit Northchurch residents.
Tring in Transition	No	New retail development should be allowed outside existing centres only if the impact on existing shopping areas would be insignificant, in order to protect small independent shops.

		We agree that local shops will be needed on large developments. Internet shopping and food delivery-to-home services are changing shopping habits and reducing use of superstores.
Tring Town Council	No	The focus should be on generating economic vibrancy in the Borough's High Streets. The ethos in 'The Grimsey Review An Alternative Future For the High Street' should be adopted: *"Town centre/high street plans must encompass a complete community hub solution incorporating health, housing, education, arts, entertainment, business/office space, manufacturing and leisure, whilst developing day time, evening time and night time cultures where shops are just part of the solution"*
Private sector		
Capital and Regional plc. (owners of the Marlowes Centre, Hemel Hempstead)	No	Agree that Hemel Hempstead town centre's retail offer should be protected from out-of-town development. There should be a positive approach that reduces the leakage of retail spending to neighbouring Hertfordshire centres. In Hemel Hempstead town centre, retail floorspace should be consolidated and the quality improved. There may be merit in focusing retail uses around the pedestrianised core. The new cinema and A3 units in the Marlowes are part of this strategy. The new Local Plan should support Hemel Hempstead town centre through a retail-led site-specific designation. Complementary uses could include offices and residential. This could encourage investment in the centre, which should be tied into wider environmental improvements to the town centre (e.g. public realm, transport links). Policy CS33 of the Core Strategy on Hemel Hempstead Town Centre already supports the approach advocated by C&R. It encourages a mix of residential, retail and employment-generating uses. C&R has undertaken some initial analysis, which can feed into the process of defining capacity and opportunities for new development around the

		Marlowes. C&R would welcome the opportunity of discussing these ideas further with DBC.
Mrs Sagar Patel (Markyate shopkeeper)	No	Markyate is an historic, close knit village with a thriving high street despite the closures of some public houses. Shoppers should be encouraged to visit the high street, the hub of the village to further drive local businesses and encourage growth. Commercial units located away from the high street that local businesses cannot compete with should be avoided.
The Crown Estate (developers of possible North Hemel Hempstead strategic site)	Yes	The plan should consider the form and size of the retail component of new local centres in strategic allocations.
General public		
		Several members of the public expressed support for the views (see above) expressed by the following organisations: • Berkhamsted Citizens' Association • Berkhamsted Town Council • Berkhamsted Residents' Action Group • Grove Fields Residents' Association (Tring)
		Other main points made by the public: • There are already sufficient if not too many existing shops, as shown by the high vacancy levels and shops changing hands. • The increase in internet shopping means that more shops will not be needed. • There should be no more out of town shopping developments/retail parks. • Existing town centres, local centres and village shops should be protected and improved.

		• Local independent and specialist shops should be protected and supported. • A wider range of uses should be encouraged in town centres. • Car parking difficulties and charges discourages people from using existing centres. • Major new developments will require retail provision.