

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
<b>15.1 Introduction</b>				
15.1	15.1.2	Local out-of-town retail and online shopping represent serious long-term threats to the health of our town centres.	The impact of out of town shopping has been acknowledged in the draft Plan and within recent retail studies. The policy approaches taken within this chapter seek to provide a positive approach to new retail developments within designated centres.	<b>No amendment in response to this issue</b>
15.2	151.2	People shop in out-of-town centres because people can shop in a comfortable safe environment, our town centres need to adopt this approach by removing traffic and making them more attractive. People who travel to shops on foot, cycle, public transport spend just as much as people in cars. Therefore people who travel sustainably must be viewed to be positively beneficial to the local economy.	The policies within the Plan as a whole seek to encourage the provision of sustainable forms of transport. The town centre first style policy also seeks to ensure the retention of a retail core which is highly accessible. The retail policies also encourage the retention and provision of local centres close to residential areas.	<b>No amendment in response to this issue</b>
<b>15.2 Retail development</b>				
15.3	15.1	There is support for the importance the plan places on the role of town centres and how it aims to protect their role, particularly in the context of requiring sequential testing for out of town centre retail developments.	Support noted.	<b>No amendment in response to this issue</b>
15.4	15.2.1	The council need to be robust in its application of national 'Town Centre First' planning policies.	This is the approach advocated in the draft policies. However, complications occur when Government policies dilute the effectiveness of this approach.	<b>No amendment in response to this issue</b>
15.5	Policy RTC1 Retail Development	Part III of the policy should make it clear as to the location where application of the impact assessment thresholds will apply.	The Policy currently does not specify a location where impact assessments will be required as the impact of a proposal will be dependent upon the type, scale and location of the development. The policy could make it clearer that the thresholds	<b>Amendment to Policy RTC1, Part III.</b> ...over 1,500 sq,m gross <u>within the settlement boundary of</u> in

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			apply within the settlement boundary of Bishop's Stortford and Hertford. These thresholds may differ depending upon a new piece of work that assesses the average unit size of properties in each town.	Bishop's Stortford; Over 1,000 sq.m gross <u>within the settlement boundary of</u> Hertford;...
15.6		The Bircherley Green area should be designated as a town centre opportunity site.	This approach has been taken in the Bishop's Stortford chapter where the Old River Lane site is outlined on the policies map and referred to in a specific policy BISH11. This approach is not necessary within Hertford as the Bircherley Green area is already designated as being part of the town centre, within which Policy RTC1 Retail Development applies. This policy provides suitable flexibility and a positive approach to suitable town centre development.	<b>No amendment in response to this issue</b>
15.7	15.2	Needs to be a reference in the chapter to meeting the retail needs of the proposed urban extensions and on the existing towns as a result of them. Despite being mentioned in various chapters it would be useful if there was a dedicated policy referring to what is expected from the urban extensions and which supports retail development to serve this growth.	This will depend upon the final expected scale of development at each site. There is a clear methodology that the Council can follow in preparing for this policy approach, which is set out in the PBA/PAS advice. This policy would then have a greater connection with Policy DPS1 which sets out the floorspace requirements for the Plan period.	<b>No amendment in response to this issue</b>
<b>15.3 Primary Shopping Area</b>				
15.8	15.3.1	Develop a policy that encourages use of empty premises by communities and 'pop-up' shops while permanent tenants are sought to keep centres vibrant.	There is nothing to prevent this happening through temporary changes and this is preferable to having empty units. These uses should still be within the uses specified within Policy RTC1.	<b>No amendment in response to this issue</b>

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<b>15.5 Secondary Shopping Frontages</b>				
15.9	15.5.1	Peripheral sites should be allowed to convert to residential and other uses and the policy should consider the contraction of town centres to focus on smaller yet more vibrant centres.	This approach is one that is considered in the latest retail advice, particularly for parts of Bishop's Stortford where peripheral sites have relatively high vacancy rates. However, this assessment has not yet been undertaken.	<b>Amendment to Policies Map required</b>
15.10	15.5.1	There ought to be initiatives to upgrade shabby areas like Maidenhead Street and provide more attractive market areas.	The Council is currently in the process of commissioning an Urban Design Strategy for Hertford to achieve just this. It is hoped that this will act as a catalyst for a similar exercise for other town centres in the district. The approach taken within the emerging policies is sufficiently flexible to facilitate such changes as they occur.	<b>No amendment in response to this issue</b>
<b>15.6 District Centres, Local Parades and Individual Shops</b>				
15.11	15.6.4	Does not recognise that Stanstead Abbots has some destination shops and services that attract from a wide catchment area.	There is an error in the policies map which includes the old secondary frontage designation as well as defining the parades within the district, neighbourhood centres and local parades. It should only fall within one of these categories. It is therefore proposed to remove the secondary frontage designations and retain the classification as a local parade. This is appropriate given that Stanstead Abbots St. Margarets is now classified as a village rather than a town.	<b>Amendment to Policies Map required</b>
<b>15.7 General</b>				
15.12		The promotion and protection of town centres should be included in the overall vision and objectives of the plan.	Parts 5 and 6 of the Vision address this particular issue. Part 6 of the Vision specifically addresses the vitality and viability of the main towns and villages. However, it should make it clear that the	<b>Amendment to text (Vision and Strategic Objectives)</b>  East Herts in 2031

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			vision refers to the vitality and viability of town centres. Parts 5 and 7 of the Strategic Objectives could be expanded upon to refer to retail businesses.	<p>6. The vitality and viability of the main town <u>centres</u> of Bishop's Stortford..... In <u>district and neighbourhood centres, and in</u> local and village <u>parades</u>, centres shopping facilities that meet local needs will have been supported.</p> <p>Strategic Objectives</p> <p>5. To foster entrepreneurial endeavour through educational attainment and encourage small and medium enterprises through maximising existing employment <u>and retail</u> opportunities and clusters and supporting rural diversification.</p>
15.13		Diageo and Wrenbridge advocate their site, Bircherley Green as a suitable location for redevelopment of this part of the town centre.	This site is located within the town centre boundary and would therefore not need a specific policy approach. It would be determined in relation to the retail policies proposed. The Council is currently in the process of commissioning an Urban Design Strategy for Hertford which would address this particular location amongst others around the town.	<b>No amendment in response to this issue</b>
15.14		St James Developments (UK) Ltd advocate the Van Hages site at Great Amwell as being suitable for the development of a supermarket.	The developers submitted an application for the food store and was due to be determined on the 10 December. However, the application was withdrawn at the last minute and the Council has therefore yet to take a view on this proposal. Officers recommended the application is refused for a number of reasons. In policy terms, the site is	<b>No amendment in response to this issue</b>

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			in an important Green Belt location and would have a negative impact on the town centres of both Hertford and Ware.	

Other Issues		
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RTC1 Retail Development	In the recent report PBA/PAS suggest that the basis for the impact thresholds should be robust. The report recommends undertaking an assessment of the average size of units within Bishop's Stortford and Hertford in particular and basing the unit size threshold on this.	<b>Future amendment to Policy RTC1</b> Officers will be undertaking this additional assessment over the coming months so this element of the policy may change.
RTC2 Primary Shopping Area	It is recommended that the boundary definitions are retained and a more positive and flexible approach to retail frontage policies is taken in order to reflect changing market conditions and to attract a wide range of people at different times of the day.	<b>Amendment to Policy RTC3 <u>(see RTC3 below for an alternative approach)</u></b>
RTC2 Primary Shopping Area	Offices and residential uses should be encouraged above ground floors to help add footfall and vibrancy. The use of upper floors for residential uses is already advocated in paragraph 15.2.4. This paragraph could be amended to make it clear that office uses will also be acceptable.	<b>Amendment to text (Paragraph 15.2.4)</b> The Council supports the use of upper floors in town centre locations for residential <u>and office</u> purposes where there is potential to provide a reasonable.....
RTC3 Primary Shopping Frontages and RTC4 Secondary Shopping Frontages	The report suggests that Policies RTC3 on Primary Shopping Frontages and RTC4 Secondary Shopping Frontages are too restrictive and could have the effect of stifling market demand, resulting in high vacancy rates. The report suggests that there are two alternative approaches that could be taken: a) to consider tightening the primary frontage boundaries of the key towns and restricting them solely to A1 and A2 uses in order to drive up the quality of the retail offer and to gain greater influence on which uses go where; or b) have a more flexible approach where the policy for primary frontages supports in principle all A use classes provided they have active frontages. The latter option is the one recommended.	<b>Amendment to Policy RTC3</b> In order to protect the vitality and viability of the Primary Shopping Areas, within the Primary Shopping Frontages in Bishop's Stortford, Hertford and Ware, as defined on the Policies Map, proposals for <u>Use Classes A1, A2, A3, A4 and A5 will be supported in principle provided they have an active frontage.</u> <del>the loss of A1 (Shop) uses will be resisted where this would result in more than 30% of units in a continuous frontage in Non-A1 Use.</del>

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RTC4 Secondary Shopping Frontages	Coupled with the approach above is the reduction in the size of secondary frontages to allow for peripheral units to revert to alternative uses including residential. This approach is recommended for Bishop's Stortford in particular where the secondary shopping frontage vacancy rate is relatively high, and also in some smaller towns where this has already occurred. An assessment will be necessary to determine where this approach is suitable based on the location of vacant units and any other plans or strategies.	<b>Amendment to Policies Map required</b>
RTC4 Secondary Shopping Frontages	The report suggests that Policies RTC3 on Primary Shopping Frontages and RTC4 Secondary Shopping Frontages are too restrictive and could have the effect of stifling market demand, resulting in high vacancy rates. The report recommends that all town centre uses as defined in Policy RTC1 should be supported in principle in defined secondary frontages.	<b>Amendment to Policy RTC4</b>  Within the Secondary Shopping Frontages in Bishop's Stortford, Buntingford, Hertford, Sawbridgeworth and Ware, as defined on the Policies Map, proposals for development or changes of use to those listed in Policy RTC1 (Retail Development) will be supported in principle, <del>where this does not lead to more than 50% of units in Non-A1 Use in a continuous frontage, and does not prejudice the viability of existing A1 Uses.</del>
RTC5 District Centres, Neighbourhood Centres, Local Parades and Individual Shops	These centres perform a different role to town centres, supporting the day-to-day needs of communities. In order to protect this role it is recommended that the Council adopts a policy that provides protection to the retail uses within them. At ground floor level a minimum of 50% of the frontage should be retained for A1 retail uses.	<b>Amendment to Policy RTC5</b>  I. Within District Centres, Neighbourhood Centres and Local Parades, development or change of use to the use classes listed in Policy RTC1 (Retail Development) above will be supported in principle, where <u>this does not lead to more than 50% of units in Non-A1 Use in a continuous frontage</u> <del>they maintain an appropriate mix</del> to secure the vitality and viability of the district <u>or neighbourhood</u> centre or local parade and <u>does</u> not conflict with other policies within this Plan.
RTC5 District Centres, Neighbourhood Centres, Local Parades and Individual Shops	It is proposed to add the word individual to Part II of this policy in order to clarify that this part of the policy is seeking to prevent the closure of vital community facilities rather than the loss of shops in general.	<b>Amendment to Policy RTC5</b>  II. Within urban and rural centres, proposals that result in the loss of <u>individual</u> shops will be considered in

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		accordance with Policy CFLR7 (Community Facilities).
15.6.4	There is an error in the policies map which includes the old secondary frontage designation as well as defining the parades within the district, neighbourhood centres and local parades. It should only fall within one of these categories. It is therefore proposed to remove the secondary frontage designations and retain the classification as a local parade. This is appropriate given that Stanstead Abbots St. Margaret's is now classified as a village rather than a town.	<b>Amendment to Policies Map required</b> Removal of secondary frontage designation and retention of RTC5 designation as a local parade.
General	The report recommends not to allocate more land for retail development within the towns but to focus on improving the existing town centre stock and public realm. Much of the quantified convenience and comparison floorspace requirements could be provided in the planned urban extensions. A calculation will need to be undertaken which assesses the potential scale of residential development within urban extensions in order to estimate how much retail floorspace should be provided. Policy RTC6 could then be expanded to state that a Neighbourhood Centre or Local Parade of approximately XX sq.m of convenience/comparison floorspace should be provided at XX location.	<b>Future amendment to Policy RTC5 required.</b>
General	The report further recommends that a strategy is developed to guide the regeneration of Hertford. The Council is currently in the process of commissioning an Urban Design Strategy for Hertford which would address this particular location amongst others around the town. This would be best integrated into the Hertford chapter itself rather than within the retail policy as it extends to other matters.	<b>No amendment in response to this issue</b>
General	The Council should consider creating a vision for each town centre to influence and secure long term aspirations. This could occur within the specific settlement chapter rather than within the retail chapter.	<b>No amendment in response to this issue</b>