

**Part 1: Issues Raised Through the Preferred Options Consultation**

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
<b>Introduction</b>				
15.1	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>
15.2	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 and other commercial/leisure developments that contribute to the vitality and viability of designated centres.	<b>No amendment in response to this issue</b>
15.3	15.1.2	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>Retail development (renumbered 15.3)</b>				
15.4	15.2.1 (now 15.3.1)	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. Recent changes to the Permitted Development Rights facilitate a greater variety of changes between uses within town centres (see new section 15.2). It is still the Council's policy that town centre type	<b>No amendment in response to this issue</b>

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			developments should be located within centres first before considering sequentially preferable locations.	
15.5	Policy RTC1	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 apply within the settlement boundary of Bishop's Stortford and Hertford.	<p><b>Amendment to Policy RTC1, III</b></p> <p>...over 1,500 sq,m gross <u>within the settlement boundary of</u> <del>in</del> Bishop's Stortford;</p> <p>Over 1,000 sq.m gross <u>within the settlement boundary of</u> <del>in</del> Hertford;...</p>
15.6	15.2.2 (now 15.3.2)	The Bircherley Green area should be designated as a town centre opportunity site.	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. The Council, working together with Hertfordshire County Council and Hertford Town Council, has recently completed a Hertford Town Centre Urban Design Strategy which includes this site and which sets parameters for its redevelopment.	<b>No amendment in response to this issue</b>
15.7	15.2 (now 15.3)	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 in terms of the retail development necessary to serve this growth.	The Retail Study 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 new paragraph should be added to refer to potential new neighbourhood centres at strategic developments within section 15.6 (renumbered 15.8).	<p><b>Amendment to text (new para. 15.8.4)</b></p> <p><u>15.8.4 New neighbourhood centres will be provided in strategic developments at Whittington Way, Bishop's Stortford; Birchall Garden Suburb, East of Welwyn Garden City; Gresley Park, East of Stevenage and the Gilston Area.</u></p>

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<b>Primary Shopping Area (Renumbered 15.4)</b>				
15.8	15.3.1 (now 15.4.1)	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 permitted through the Permitted Development Rights 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>
<b>Secondary Shopping Frontages (Renumbered 15.6)</b>				
15.9	15.5.1 (now 15.6.1)	The reduction in the size of secondary frontages should be considered 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.	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. This decision needs to be taken in the context of a growing town and other potential developments within the town centre and the wider town.	<b>No amendment in response to this issue</b>  If required, changes will be reflected in the Policies Map.
15.10	15.5.1 (now 15.6.1)	There ought to be initiatives to upgrade shabby areas like Maidenhead Street and provide more attractive market areas.	The Council has recently completed a Hertford Town Centre Urban Design Strategy. The Council will use this will act as a catalyst for a similar exercise for other town centres in the district and to guide development within the town. 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>District Centres, Local Parades and Individual Shops (Renumbered 15.8)</b>				
15.11	15.6.4 (now 15.8.4)	Does not recognise that Stanstead Abbots has some destination shops and services that attract from a wide catchment area.	There are shops within the settlement, however, their type and size are more akin to a local service centre function serving the settlement and the wider hinterland.	<b>No amendment in response to this issue</b>

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<b>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 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><b>Amendment to text (Vision and Strategic Objectives)</b></p> <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>, <del>centres</del> 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. The Council has recently completed a Hertford Town Centre Urban Design Strategy which includes this site. 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>
15.14		St James Developments (UK) Ltd advocate the Van Hages site at Great Amwell as being suitable for the development of a supermarket.	In policy terms, the site is in an important Green Belt location and a supermarket in this location would have a negative impact on the town centres of both Hertford and Ware. The application for this development was withdrawn in 2015.	<b>No amendment in response to this issue</b>

**Part 2: Other Proposed Amendments**

Policy/ Paragraph	Issue	Proposed Amendment
15.1.3	Paragraph now out of date and should be deleted.	<p><b>Amendment to text (para.15.1.3 deleted)</b></p> <p><del>15.1.3 The Town and Country (General Permitted Development) (Amendment) (England) Order 2013 came into force on 30 May 2013. The new rules allow high street premises to be used for new types of businesses without planning permission. Certain new retail businesses and other services will be able to open for up to two years in buildings classified as A1, A2, A3, A4, A5, B1, D1 or D2 (shops, financial services, restaurants, pubs, hot food takeaways, business, non-residential institutions, leisure and assembly). Whilst acknowledging these changes, the District Plan must plan for the whole plan period and consider the longer term needs of the district's high streets.</del></p>
Info Box at 15.1.3	This is more appropriately located in 15.3.	<p><b>Amendment to text ('orange box' moved to below para. 15.3.4)</b></p>
<b><u>Permitted Development Rights (New section added)</u></b>		
	<p>The Town and Country Planning (General Permitted Development) (England) Order 2015 introduces a far more relaxed approach to changes of use in retail and other commercial premises.</p> <p>The Chapter needs to be updated to reflect the Order and permitted development rights generally. However, it is important that the Plan also considers the longer term needs of the district's high streets.</p>	<p><b>Amendment to text (new section added – paragraphs 15.2.1 – 15.2.5)</b></p> <p><u>15.2.1 Permitted development rights are a national grant of planning permission which allow certain building works and changes of use to be carried out without having to make a planning application. Permitted development rights are subject to conditions and limitations to control impact and to protect local amenity.</u></p> <p><u>15.2.2 Permitted development rights are set out in The Town and Country Planning (General Permitted Development) (England) Order 2015. The Order allows change of use between shops and financial and professional services, allowing the change of such uses to restaurants or leisure use. The Order is also intended to increase housing supply by allowing change of use from some business uses to residential.</u></p> <p><u>15.2.3 Not all changes of use will be permitted development. Some will be subject to a prior approval process which means that a developer has to seek approval from the local planning authority that specified elements of the development are acceptable before work can proceed. The matters for prior approval vary depending on the type of development and these are set out in full in the relevant parts in Schedule 2 to the Order.</u></p> <p><u>15.2.4 There are also a range of exclusions which apply to permitted development rights such as</u></p>

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		<p><u>within Conservation Areas. Some permitted development rights are also in place for a limited period of time; again, these are set out in full in the relevant sections in Schedule 2 to the Order.</u></p> <div style="border: 1px solid black; padding: 5px;"> <p><u>Permitted development rights are set out in The Town and Country Planning (General Permitted Development) (England) Order 2015</u></p> </div> <p><u>15.2.5 Whilst acknowledging permitted development rights, the District Plan must also consider the longer term needs of the district's high streets. It is therefore important that the Council plans positively, to support town centres to generate local employment, promote beneficial competition within and between town centres, and create attractive, diverse places where people want to live, visit and work.</u></p>
<b>Retail development</b>		
15.3.2	This section should only refer to town centres. Reference to the Thorley Centre should therefore be deleted. District Centres are covered under Section 15.8.	<p><b>Amendment to text (Para. 15.3.2)</b></p> <p>4. <del>District Centre: The Thorley Centre, Bishop's Stortford</del></p>
15.3.3	The Plan should refer to the sequential test as required in the NPPF.  Instead of this text being in the policy it should be moved to a preamble paragraph and the text in Policy RTC1, Part II to be made more succinct (also see below).	<p><b>Amendment to text (para. 15.3.3 and Policy RTC1, Part II)</b></p> <p><u>15.3.3 In accordance with paragraph 24 of the National Planning Policy Framework (NPPF), the Council will apply a sequential test to applications for main town centre uses. The main town centre uses, as defined in the NPPF, should be located in the town centre, then in edge of centre locations, and only if suitable sites are not available, should out of centre locations be considered. When considering edge of centre and out of centre proposals, preference will be given to accessible sites that are well connected to the town centre. The Council and the applicant will demonstrate flexibility on issues such as format and scale.</u></p> <p><del>Policy RTC1, Part II. Proposals will be assessed in line with the sequential approach. The main town centre uses as listed should be located in the town centre, then in edge of centre locations and only if suitable sites are not available should out of centre locations be considered. When considering edge of centre and out of centre proposals, preference will be given to accessible sites that are well connected to the town centre. The Council and the applicant will demonstrate flexibility on issues such as format and scale.</del></p>

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15.3.4	For clarity, reference should be added to The Retail and Town and Centres Study (2013).	<p><b>Amendment to text (para. 15.3.4)</b></p> <p>15.3.4 The NPPF states that where a proposal is over a proportionate, locally set floorspace threshold, local planning authorities should require an impact assessment to be submitted. <u>The Retail and Town Centres Study (2013) indicated that it</u> is not considered appropriate to apply the default threshold of 2,500 sq.m gross across the district as this scale of development would represent a significant proportion of the overall retail projections for East Herts through the Plan period.</p>
15.3.5	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 15.3.5. This paragraph could be amended to make it clear that office uses will also be acceptable.	<p><b>Amendment to text (para. 15.3.5)</b></p> <p>15.3.5 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.....</p>
Policy RTC1, I	To avoid confusion it is considered more helpful to reference main town centre uses as defined in the NPPF.	<p><b>Amendment to Policy RTC1, Part I</b></p> <p>I. Within the town centre boundaries as defined on the Policies Map, <u>main town centre uses as defined by the NPPF</u> the following uses will be supported in principle, where they contribute to maintaining the role and function, viability and vitality of the market town:-</p> <ul style="list-style-type: none"> <li>• <del>A1 (shops)</del></li> <li>• <del>A2 (financial and professional services)</del></li> <li>• <del>A3 (restaurants and cafes)</del></li> <li>• <del>A4 (drinking establishments)</del></li> <li>• <del>A5 (hot food takeaways)</del></li> <li>• <del>B1a (offices)</del></li> <li>• <del>C1 (hotels)</del></li> <li>• <del>D1 (non-residential institutions)</del></li> <li>• <del>D2 (assembly and leisure)</del></li> </ul>



Policy/ Paragraph	Issue	Proposed Amendment
Policy RTC1, III	The policy needs to be consistent with the NPPF, which contains two measures for testing impacts, one for minor and one for major applications.	<p><b>Amendment to Policy RTC1, Part III</b></p> <p>The assessment should also consider the impact of the proposal on <u>town centre</u> vitality and viability, including local consumer choice and trade in the town centre and the wider area. <u>The impact should be measured for up to five years from the time the application is made. For major schemes, the impact should be measured</u> for up to ten years from the application. The following thresholds will be applied:</p>
Policy RTC1, III	Reference to Part III of the Policy should be added for clarity.	<p><b>Amendment to Policy RTC1, Part IV</b></p> <p>IV. Where a proposal fails to satisfy the sequential approach or is likely to have an adverse impact <u>in line with Part III above</u>, it will be refused.</p>
<b>Primary Shopping Area</b>		
15.4.3	The Permitted Development Order 2015 introduced new terminology for town centres – ‘key shopping areas’. There is therefore a need to clarify how the policy will approach the discrepancy between the Order and the NPPF. New text proposed to explain how this discrepancy will be treated.	<p><b>Amendment to text (new para. 15.4.3)</b></p> <p><u>15.4.3 For consistency with the Permitted Development Order 2015, ‘key shopping areas’ are those designated as Primary Shopping Areas in this Plan. Changes of Use proposals from A1 (Shop) or A2 (Financial and Professional Services) to other uses will be expected to demonstrate that there is no reasonable prospect of the unit being put to A1 or A2 use and that following the change of use there will be an adequate provision of A1 or A2 uses to maintain the sustainability (viability and vitality) of the Primary Shopping Area.</u></p>
15.4.4	Reference should be made to the design chapter to highlight the importance of good design within the historic centres of the District’s market towns. The paragraph should also refer to the Hertford Town Centre Urban Design Framework and Bishop’s Stortford Planning Framework.	<p><b>Amendment to text (para 15.4.4)</b></p> <p><u>15.4.4 The historic environment and market town heritage of East Herts’ town centres are a key attraction to both retailers and visitors. Alterations to shop fronts are expected to be of the highest quality, reflecting the local character and vernacular in accordance with Policy DES3. The Council will consider the use of Design Codes to guide development where necessary. Development within Hertford will be guided by the Hertford Town Centre Urban Design Framework, while development within Bishop’s Stortford will be guided by the Bishop’s Stortford Town Centre Planning Framework.</u></p> <p><u>The Hertford Town Centre Urban Design Strategy can be viewed at <a href="http://www.eastherts.gov.uk/htcuds">www.eastherts.gov.uk/htcuds</a>.</u></p> <p><u>The Bishop’s Stortford Planning Framework can be viewed at <a href="http://www.eastherts.gov.uk/bstcpf">www.eastherts.gov.uk/bstcpf</a></u></p>



Policy/ Paragraph	Issue	Proposed Amendment
Policy RTC2	Amendment to Policy required following clarification of Policy RTC1.	<p><b>Amendment to Policy RTC2, Part I</b></p> <p>I. Within the Town Centre boundaries as defined on the Policies Map, Primary Shopping Areas are designated for the Town Centres of Bishop's Stortford, Hertford and Ware, within which retail and other <u>main</u> town centre uses, as listed in Policy RTC1 (Retail Development), <u>defined in the NPPF</u>, should be located.</p>
<b>Primary Shopping Frontages</b>		
15.5.1	Change Latin term to plain English	<p><b>Amendment to text (para. 15.5.1)</b></p> <p>...it is not appropriate to take a laissez faire <u>relaxed</u> approach to development.....</p>
15.5.1	Section needs to acknowledge the latest position on Permitted Development Rights and the Prior Approval process and be phrased more positively. There should also be a definition of what is meant by the terms 'adequate' and 'frontage'	<p><b>Amendment to text (para. 15.5.1)</b></p> <p>15.5.1 <u>Whilst acknowledging</u> <del>Recognising temporary changes in permitted development opportunities</del>, it is not appropriate to take a laissez faire approach to development within East Herts' town centres, nor is it appropriate to <u>prevent</u> <del>ban</del> changes of use from A1 (Shop) uses to other uses, as to do so could prevent diversity and stifle investment, resulting in vacant uses. However, it is appropriate to seek to maintain a high proportion of A1 (Shop) uses in order to ensure the vitality and viability of the town centres, so that they are able to perform their function as retail and leisure destinations, <u>and to distinguish between the primary and secondary frontages. For the purpose of this policy and for the application of the Prior Approval process, an adequate provision of A1 and A2 is defined as at least 50% of units in a single frontage being in A1 and A2 uses. A single frontage is normally described as an unbroken row of shops, usually within two side roads and is shown on the Policies Map.</u></p>
Policy RTC3	<p>The Retail and Town Centres Study 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.</p> <p>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</p>	<p><b>Amendment to Policy RTC3</b></p> <p>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 Class A1 will be supported in principle as the preferred use, while Use Classes A1, A2, A3, A4 and A5 will be supported in principle provided they have an active frontage and there remains an adequate provision of A1 and A2 uses which support its role as a Primary Shopping 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></p>

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	<p>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.</p> <p>The policy needs to be expanded to reflect the prior approval criteria referred to in para. 15.5.1.</p>	
<b>Secondary Shopping Frontages</b>		
Policy RTC4	<p>The Retail Study 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 to support the viability and vitality of the frontage or the town centre as a whole.</p>	<p><b>Amendment to Policy RTC4</b></p> <p>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 <u>main town centre uses or those that will support the vitality and viability of the frontage or town centre as a whole (such as employment generating or activity generating uses)</u> those listed in Policy RTC1 (Retail Development) will be supported in principle 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.</p>
<b><u>Markets and Specialist Events (new section added)</u></b>		
15.7.1 and 15.7.2	<p>The Council's Economic Development Strategy supports the provision of markets within East Herts' towns. While there is no need for a policy, it is considered helpful to refer to their importance, including highlighting the additional benefits that such events bring to the district's economic wellbeing.</p>	<p><b>Amendment to text (new section 15.7)</b></p> <p><b><u>15.7 Markets and Specialist Events</u></b></p> <p><u>15.7.1 Markets, Farmers Markets and specialist events are an important feature of town centres, promoting the identity of the town, while increasing visitor numbers which creates additional trade for other town centre premises on market day. Specialist markets also draw in visitors from further afield and are key selling opportunities for local farms, smallholders and the crafting community.</u></p> <p><u>15.7.2 The Council's Economic Development Strategy seeks to maintain and enhance markets and specialist events in East Herts' town centres, and the Council will work with partners</u></p>

Policy/ Paragraph	Issue	Proposed Amendment
		<u>to deliver such events. Development proposals that enhance the town centre environment to support market and specialist events will be encouraged.</u>
<b>District Centres, Local Parades and Individual Shops</b>		
15.8.1	Typographical correction required.	<b>Amendment to text (para. 15.8.1)</b>  15.8.1 District centres, neighbourhood centres and local parades support <u>the</u> day-to-day needs of communities, providing opportunities for top-up shopping and access to services and social interactions.
15.8.2 and 15.8.3	There is repetition in the text and the bullet points below. The bullet points can be removed.	<b>Amendment to text (Para. 15.8.2 and Para. 15.8.3 )</b>  <ul style="list-style-type: none"> <li>• <del>Bishop's Stortford: The Thorley Centre – District Centre</del></li> <li>• <del>Bishop's Stortford: Bishop's Park – Neighbourhood Centre</del></li> </ul>
15.8.3	Clarification over the size of the two supermarkets at the Bishop's Park and Thorley Centres is necessary to ensure accuracy. The Bishop's Park store is slightly larger in terms of external floorspace.	<b>Amendment to text (para. 15.8.3)</b>  15.8.3 <del>The Bishop's Park Centre in Bishop's Stortford is similar to the Thorley Centre, in terms of the local provision of food shopping and services. However, as the supermarket is smaller, there is only one other retail unit and a community centre on the site, its role is more limited. As such, the Bishop's Park Centre is identified as a Neighbourhood Centre.</del> <u>The Bishop's Park Centre in Bishop's Stortford is similar to the Thorley Centre, in that it provides a local destination for food shopping and services. However, despite the supermarket being slightly larger, the centre contains only one other retail unit and a community centre. Therefore the role of the centre is more limited than the Thorley Centre. As such, the Bishop's Park Centre is identified as a Neighbourhood Centre.</u>
15.8.6	For clarity a new table should be added which lists all the district, neighbourhood and local parades. The previous bullet list should be deleted.	<b>Amendment to text (para.15.8.6)</b>  <u>15.8.6 A full list of District and Neighbourhood Centres, and Local Parades is provided in the table below:</u>  <u>New table inserted (see chapter)</u>  1. <del>Bishop's Stortford:</del> a. <del>Heckerill</del> b. <del>Havers Parade</del>

Policy/ Paragraph	Issue	Proposed Amendment
		<p>e. <del>Snowley Parade</del></p> <p>2. <del>Hertford:</del></p> <p>a. <del>Fleming Crescent, Sele Farm</del></p> <p>b. <del>The Avenue, Bengoe</del></p> <p>3. <del>Ware:</del></p> <p>a. <del>The Green, Kingshill</del></p> <p>b. <del>Cromwell Road</del></p> <p>c. <del>King George Road</del></p> <p>4. <del>Villages:</del></p> <p>a. <del>Puckeridge</del></p> <p>b. <del>Stanstead Abbots and St. Margarets</del></p> <p>c. <del>Watton at Stone</del></p>
Policy RTC5	<p>These centres perform a different role to town centres, supporting the day-to-day needs of communities. In order to protect this role the Council should adopt 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.</p> <p>Amendment to Policy required following clarification of Policy RTC1.</p> <p>Remove reference to other policies within the Plan for consistency. The Plan should be read as a whole.</p>	<p><b>Amendment to Policy RTC5, Part I</b></p> <p>I. Within District Centres, Neighbourhood Centres and Local Parades, development or change of use to <u>main town centre uses</u> the use classes listed in Policy RTC1 (Retail Development) above will be supported in principle, <del>where</del> <u>unless this results in more than 50% of units in Non-A1 Use in a continuous frontage</u>, <del>they maintain an appropriate mix to secure the vitality and viability of the district</del> <u>or neighbourhood</u> centre or local parade <del>and does not conflict with other policies within this Plan.</del></p>
Policy RTC5	<p>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.</p> <p>Remove geographical limit in the policy wording as the loss of individual shops should be resisted wherever they are.</p>	<p><b>Amendment to Policy RTC5, Part II</b></p> <p>II. <del>Within urban and rural centres, p</del> <u>Proposals that result in the loss of individual shops will be resisted and will be</u> considered in accordance with Policy CFLR7 (Community Facilities).</p>

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Policy RTC5	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 where necessary.	<b>Amendment to Policies Map required</b>  Removal of secondary frontage designation and retention of RTC5 designation as a local parade.