

Examination of the North Hertfordshire Local Plan (2011-2031)

Examination hearing sessions

Statement of North Hertfordshire District Council

Matter 14 – Town and Local Centres (Policies SP4, ETC3, ETC4, ETC5, ETC6, ETC7 and ETC8)

Town and Local Centres: the retail hierarchy, retail capacities and shopping areas and frontages

14.1. What is the justification for the retail hierarchy set out in Policy SP4? Is the evidence underpinning it adequately robust?

1. The justification for the retail hierarchy is set out in the Local Plan evidence document E1 North Herts Retail Study (Nathaniel Lichfield and Partners) 2016. Paragraph 23 of the NPPF states that local planning authorities should ‘define a network and hierarchy of centres that is resilient to anticipated future economic changes’.
2. Nathaniel Lichfield and Partners (NLP) have been engaged by the council since 2009 to survey, monitor and review retail. NLP’s methodology is robust and proportionate with regard to the NPPF and Planning Practice Guidance (PPG).
3. The NPPF states that local planning authorities ‘should recognise town centres as the heart of their communities and pursue policies to support their viability and vitality’. For the submission Local Plan NLP undertook a full update of retail including a new household telephone survey (1,000 interviews), town centre health checks including an in-street survey and a review of the strategy to inform policy. [Reference: North Hertfordshire Retail Study, June 2016, Evidence Paper E1.]
4. The analysis also assessed competing centres within the sub-region, utilising Javelin’s Venuescore UK Shopping Index, which ranks the UK’s top 3,000 retail destinations. This information is widely adopted in the retail industry and provides a useful qualitative spectrum of the each shopping destination’s offer in terms of discount stores through to luxury, the age focus of stores, quality of fashion shopping and the food / beverage offer.
5. Lichfields’ centre health checks and analysis of existing facilities confirmed that Hitchin and Letchworth Garden City are the main comparison goods shopping destinations within the District. They have a critical mass of convenience and comparison shopping floorspace and a good range of non-retail services. Baldock and Royston are smaller centres that serve their respective settlements and smaller catchment areas, providing a more limited range of shops and non-retail services.

6. The hierarchy of centres is also informed by the household survey results, which were used to estimate the catchment area, market share and expenditure retention of each centre, and the flow of expenditure leaking from the district to surrounding centres. The survey results indicate that the four designated town centre retain a reasonable proportion of retail expenditure within their respective catchment areas.
7. In terms of retention of convenience shopping (Table 4 in Appendix 2) Hitchin retains 71.4% of expenditure, Letchworth Garden City 82.2% , Royston 64.8% and Baldock 52.6%. For comparison expenditure people are prepared to travel further than for convenience shopping. The highest retention (Table 4 in Appendix 3) is Letchworth Garden City 46.7%, then Hitchin 41.7%, Royston 26.9% and Baldock 19.9%. The future strategy as a minimum aims to maintain current market shares. This strategy will maintain the current hierarchy of retail destinations and will not impact on surrounding authorities.
8. Based on this detailed analysis, the submission Local Plan is clear in its spatial vision that the 'vitality and viability of the towns of Hitchin, Letchworth Garden City, Royston and Baldock are safeguarded'.
9. The other elements of the retail hierarchy in SP4 are the 13 existing local centres and the two centres planned for new development in north Baldock and east of Luton. Policy SP4 does not differentiate between these centres but they are all common in having shops, services and facilities that are important to the communities they serve and therefore have the proposed benefit of being designated centres in order to provide policy in order to support town /local centre uses. In addition, SP4(f) provides support for the retention and provision of shops outside of identified centres where they serve a local need – this includes strategic housing sites that could provide some additional services, such as a parade, but are not specifically identified as Local Centres. The NPPF Glossary indicates that references to town centres include local centres but exclude small parades of shops.
10. Taken as a whole, the retail hierarchy proposed in SP4 reflects the current situation in retail destination expenditure, Venuescore and current town / local centre other uses. The submission Local Plan does not differentiate between the four town centres having each moving forward to retain their market share. To serve the population growth to 2031 and the housing and employment allocations, each of the town centres with the exception of Baldock have proposed retail allocation in Section 4 of the Local Plan, in addition to the general policy of SP4 supporting the growth of town / local centres uses within the town /local centres. This growth should retain the current hierarchy and provide viable and vital futures for the town / local centres within the district and not alter the wider sub-regional retail hierarchy.
11. In terms of other town centre uses, NLP has found that there is no likely deliverable capacity for further theatre, ten pin bowling, nightclubs or bingo venues in the district. However, potential capacity was found to exist for private health and fitness clubs in Letchworth Garden City and Royston and potential for a small cinema within the district if market share could be gained from competing centres.

14.2 The North Hertfordshire Retail Study Update 2016 (June 2016) [E1] projects the District's capacity for comparison and convenience retail floorspace.

a) Does the provision set out in Policy SP4 reflect this evidence?

12. Yes Policy SP4 correlates with evidence in E1 paragraph 5.9, page 42. The retail floorspace capacity figures are derived from E1 Table 12 in Appendix 2 and Table 11 in Appendix 3. The rounded gross floorspace projections up to 2031 figures have been included within Policy SP4.

b) Is the evidence underpinning the retail capacities identified adequately robust?

13. The retail floorspace capacity figures are derived from E1 Table 12 in Appendix 2 and Table 11 in Appendix 3. The rounded gross floorspace projections up to 2031 figures have been included within Policy SP4.

14. Lichfields' updated retail study methodology [E1] adopts the approach set out in the PPG, and this approach has underpinned a number of adopted development plans across the country. The retail capacity assessment was based on the most recent expenditure, population and home/on-line shopping forecasts and involved auditing existing centres to assess their role, vitality, viability and potential to accommodate new development and town centre uses. The assessment is broken down into five year intervals to show potential phasing of development over the lifetime of the Local Plan up to 2031, but recognises there will be a need for regular reviews as the PPG considers that long term projections will be less robust.

15. In terms of the phasing of development, E1 para 5.12 states "It will not be necessary to bring forward opportunities to accommodate longer term growth after 2026, and these long term projections will need to be monitored and kept under review. Broad areas where long term growth may be accommodated should be identified, and if necessary brought forward if the projected levels of growth are achieved." The Local Plan identifies the areas for potential retail growth and this balances NPPF paragraph 23 which states 'town centre uses are met in full and are not compromised by limited site availability' and the PPG [ID: 2b-002-20140306] which seeks an assessment of needs for the centres to accommodate new development and different types of development covering a 3 to 5 year period.

c) Precisely how does the Plan address the retail capacities identified?

16. Policy SP4 indicates the Council will make provision for an appropriate range of retail facilities across the District, and sets out the global quantum of floorspace that will be

required over the plan period. Policy SP4 is the strategic policy covering retail capacity across the District as a whole over the plan period. The retail allocation reflects the detailed capacity analysis across the seven area zones and the floorspace capacity in each of the relevant centres. These in turn have individual policies which will be monitored annually and reviewed regularly through retail assessment updates, recognising that shopping catchment areas overlap, and the distribution of retail capacity contained within E1 only provides a broad guide.

17. Sites are identified where they are needed up to 2026. Post 2026, the Council has identified that Letchworth Town Centre provides a number of opportunities to meet long term needs. The supporting text (para. 4.46) indicates that the reoccupation of some vacant floorspace should meet some of the floorspace projection, but new sites will need to be identified.
18. E1, Section 5 assesses how the floorspace projections could be accommodated within the District. Section 5 suggests vacant units in Letchworth Garden City and Royston could accommodate 2,600 sq.m gross and 1,100 sq.m gross respectively. E1 also suggests that new local shopping facilities within urban extensions (E1 paragraph 5.45) will help to accommodate growth. In line with this recommendation, SP14 to SP19 makes provision for retail uses within strategic housing sites. Retail allocations within town centres have also been included in HT 11, HT 12, LG19, LG20, LG21 and RY12.
19. Collectively vacant shop units, urban extensions and allocations are expected to accommodate the global need for additional retail floorspace over the plan period.
20. Towards the middle of the plan period we expect that retail development will also start to be delivered within the strategic sites, therefore we need to keep these figures under review to ensure that the new centres that come forward are of an appropriate scale and do not negatively impact on the district's existing town and local centres.
21. To this end, in the medium term the Council will start to review the town centre strategies in order to take account of progression of residential allocations and to meet long term retail need. In reviewing the strategies, a pragmatic approach will be followed that will allow for a more detailed assessment of each of the town centres and the wider town centre areas, where the Council's growth strategy; changes in retail demand/patterns and the economic climate will be taken into consideration.

d) What type of retail use is anticipated on each of the allocated sites proposed? Should the Plan be clearer about this?

22. The plan clearly sets out the types of uses for each allocated site through policy. SP14, 15, 17, 18 and 19 set out use classes and quantum of retail. HT11 and HT12 both provide for 4,000 m² of gross additional main town centre use floorspace and LG19 provides for 4,500m², LG20 1,000 m², LG21 5,000 m² and RY12 4,000 m² gross additional main town centre use floorspace.

23. These policies are site specific and contain specific bullet points regarding considerations to be taken into account in the design of any proposals. No specific types of retail are required by the Local Plan however these allocations are subject to policies ETC3 regarding sequential tests and impact assessment.
24. In terms of impact assessment local thresholds have been calculated for Hitchin at 2,500 m², Letchworth Garden City at 1,000 m² and Baldock, Royston and elsewhere at 500 m². In addition, the for town centres are subject as appropriate to policies ETC4 regarding primary shopping frontages and ETC5 regarding secondary shopping frontages and each policy will be subject to the authority's monitoring report.
25. Appendix 1 of this statement provides more detail on each policy.

e) Should Policy SP4 be more specific about the distribution of retail floorspace across the centres in the retail hierarchy? Should it earmark specific levels of floorspace for each centre?

26. No. Policy SP4 is the strategic policy covering retail capacity over the whole plan period. The seven area zones have provided for the capacity in each of the relevant centres. These in turn have individual policies which will be monitored annually and reviewed regularly through retail assessment updates.

14.3. Are the proposed town centre boundaries, and the primary and secondary shopping frontages defined on the Policies Map appropriate and justified? How has their precise delineation been arrived at?

27. The town centre boundaries and the extents of primary and secondary frontage are shown on the draft Proposals Map.
28. The retail study (2016) includes recommendations for the future extents of both town centre boundaries and frontages and details the resulting changes since the previous Local Plan (i.e. the 1996 NHDC Local Plan No 2 with Alterations). The majority of these changes have been taken forward as they reflect changes in the retail environment and the mix of uses that currently exist. The key changes are summarised in appendix 1.

14.4 Paragraph 4.48 of the Plan refers to 'broad locations'. What and where are these? What role do they play in relation to the retail capacities identified?

29. 'Broad locations' refers to areas such as Letchworth Garden City town centre where the council has identified sites that may provide opportunities but more detailed work is required; where sites have been identified that, if (re-)developed wholly for retail could

deliver more than the requirement identified in the policy; and where there may be some scope for intensification in and around what is already in-situ.

30. This correlates with the identification of Letchworth Garden City's Town Centre as a 'broad location' where additional housing may be realised in the period after 2026 (see the Council's Matter 4 Statement).

Town and Local Centres: development management policies (Policies ETC3, ETC4, ETC5, ETC6, ETC7 and ETC8)

14.5 Is the approach taken to retail, leisure and other main town centre development in Policy ETC3 sound? In particular,

a) What is the justification for the thresholds for the provision of an impact assessment?

31. The justification for the local impact assessment thresholds is set out in E1 paragraphs 7.25 to 7.30, taking into account guidance within the PPG and the retail capacity projections for each town.

32. The NPPF threshold is considered appropriate for Hitchin based on its scale and current health and vitality.

33. The NPPF threshold (2,500 sq.m) was not considered appropriate for Letchworth Garden City and so a lower threshold of 1,000 sq.m is proposed, reflecting the vulnerability of the centre in terms of the high shop vacancy rate.

34. Nor was the NPPF threshold considered appropriate for Royston and Baldock due to their small scale (only around 6,000 sq.m gross retail floorspace), the limited retail capacity projections for these centres and the likely impact this scale of development would have on their vitality and viability. As a result, a reduced threshold of 500 sq.m gross is proposed, broadly consistent with the five-year capacity projections for these towns.

b) Should the thresholds be within the policy itself?

35. Policy ETC3 (b.) requires impact assessments subject to the locally set thresholds. The threshold floorspace limits are listed in the supporting text (paragraph 5.19). This approach is clear and consistent with the NPPF. Having these in the supporting text allows for flexibility for thresholds to change to reflect new evidence or changes in national policy.

14.6 Is the approach taken to Primary Shopping Frontages in Policy ETC4, and to Secondary Shopping Frontages in Policy ETC5, justified, effective and consistent with national policy?

36. The NPPF paragraph 23 indicates councils should provide a clear definition of primary and secondary frontages, and make it clear what uses will be permitted in these locations. The NPPF glossary indicates primary frontages are likely to include a high proportion of retail uses, whilst secondary frontages provide greater opportunities for a diversity of uses such as restaurants and leisure uses.
37. The retail study 2016 indicates that a mix of class A1 to A5 retail uses are required over the plan period, over and above existing provision. It is necessary to safeguard against the loss of these uses within town centres. Policy ETC4 and ETC5 seek to promote and maintain customer choice and a diverse retail offer. The policy options were assessed in Section 6 of the retail study 2016.
38. As there are limited opportunities for additional or replacement town centre uses within the centres of settlements, existing A-class uses are safeguarded through the frontages policies.

14.7. Is the approach taken to Local Centres in Policy ETC6 justified, effective and consistent with national policy?

39. NPPF Paragraph 28 indicates that the retention of local services and community facilities should be promoted. The NPPF Glossary indicates that references to town centres include local centres, but exclude small parades of shops. Local centres are subject to the same NPPF objectives and controls set out in paragraphs 23 to 27.
40. The approach taken in the draft plan in policy ETC6: Local Centres seeks to prevent the loss of facilities. In terms of future provision, growth of these centres is best delivered through the planning application process as they each serve small areas and the subtleties of demand are too small to plan proactively for. Allocating a site in one location for the need identified above would only serve to distort the function of that particular centre.
41. In 2015 there were 219 units in all local centres, 13 of which were vacant. This suggests a vacancy rate of 5.9%, denoting a healthy retail environment. The broad locations of the district's local centres are identified on the draft proposals map. The extents of the local centres (at 2016) are detailed in the Communities Chapter of the Local Plan.

14.8 Is the approach taken to scattered local shops and services in towns and villages in Policy ETC7 justified, effective and consistent with national policy?

42. Policy ETC7 is consistent with NPPF paragraph 28, which indicates the retention of local services and community facilities in village centres should be promoted. The benefits of this approach are explained in the supporting text para. 5.33 to 5.38).
43. Policy ETC7 enables new facilities to serve local areas as an exception to the sequential approach. Concentrating all shops and services within designated centres would not present the most sustainable pattern of development, particularly within rural parts of the District.

14.9 Is the approach taken to tourism in Policy ETC8 justified, effective and consistent with national policy?

44. Policy ETC8 is consistent with the NPPF paragraph 23 which supports tourism as a town centre uses and paragraph 28 which supports tourism developments that benefit businesses, communities and visitors in rural areas.
45. Policy ETC8 provides an exception to the sequential test (Policy ETC3) where tourism proposals come forward. This provides for within settlement boundaries and outside of settlement boundaries where evidence is provided that the facility can not be provided within the boundaries and that it will support the rural economy. The policy provides flexibility to support the rural economy.

14.10. The Plan allocates land for main town centre uses (as part of a mix of uses) in Hitchin (HT11 and HT12), Letchworth (LG19, LG20 and LG21) and Royston (RY12).

a) Have all sites put forward for allocation been considered through the SA? Is the SA based on appropriate criteria and is it a robust and sound base of evidence?

46. Yes. Appendix 6 of the Submission SA includes the summaries and details of the sustainability appraisal of each site.

HT11 – Page 71, HT12 – Page 73, LG19 – Page 111, LG20 – Page 112,

LG21- Page 114, RY12 – Page 138.

47. The SA is based on appropriate criteria and soundly informs the evidence base.
48. The sites chosen were endorsed by Full Council on 20 July 2016 and the Draft SA [SP4] was included in the information provided when this decision was made (Appendix 5 of the report to Council). The Draft SA report included summaries and full SA

matrices for all the reasonable alternatives considered for site selection. The report submitted to Council noted that:

The results of the Sustainability Appraisal to date are reflected in the draft policies presented to Council. In particular, they have helped to inform the site-specific measures identified for the proposed housing sites in the Communities section of the plan.

49. The proposed Submission Plan was approved by Cabinet on 26 September 2016. The report submitted to Cabinet noted:

In preparing the spatial strategy and policies for the emerging Plan, a number of options have been considered through the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) process. This includes identifying policy options for how the District should develop and in particular where development should happen, and how much development there should be.

50. The Submission SA was included in the information available when this decision was made. The Submission SA was included in Appendix 5, and Members were informed that it was also available online and as a separate report in the Members Room.

b) What process or methodology has been used to select sites for allocation?

51. Appendix 2 of the Retail and Town Centres Background [E2] tabulates the sites considered. This provides evidence and reasoning for site selection. The sites considered to be reasonable alternatives were then appraised by the Submission SA, as described under matter 2.2. They were then reviewed by the Council and a final decision made on which sites to include within the Proposed Submission North Hertfordshire Local Plan based on a number of key planning considerations including the SA. Note LG20 in the appendix should read 'allocate' not 'do not allocate'.

c) Have all sites put forward for allocation been considered through the process/methodology? Has the testing of reasonable alternatives been robust?

52. The sites have been considered through the production of town centre strategies and discussions with town centre partners rather than submissions. The reasonable alternatives have been dismissed on the basis of their availability in the short to medium term rather than their long-term potential. Appendix 2 of the Retail and Town Centres Background [E2] tabulates the sites considered.

d) Has greater weight/importance been given to any site selection criteria over others and if so what is the justification for this 'weighting'?

53. The sites have not been weighted but lack of availability has discounted sites from allocation in this Local Plan review, such as the Old grammar school, Broadway. [Page 19, E2].

e) Have all constraints been taken into account?

54. Yes, the SA considers the constraints and the E2 summarises the key issues for each site.

f) Have alternative uses been considered?

55. All proposed allocations are for mixed use so can accommodate what the market considers appropriate and viable in line with the Local Plan as a whole. Please note E2, page 17 for LG21 should read 'mixed use' not 'retail' as per LP1, page 186.

Appendix 1

SP14 – Site BA1 is the largest allocation in the Local Plan – it is for provision of approximately 2,800 homes and through SP3, 19.6 ha of employment land. Within SP14 allocation there is a requirement for a new local centre with additional neighbourhood-level provision providing around 500 m² (net) class A1 Convenience retail provision and 1,400 m² (net) of other A-class floorspace. There are few opportunities within the centre of Baldock for new retail and the intention of the local centre is to trade on the growth in capacity created by the new community. No specific types of retail are required by the Local Plan other than the A use classes and D1 / D2 (see more below), however E1 does indicate the type of uses already in the centres through Venuescore.

SP15, Site LG1 is for provision of approximately 900 homes Within SP15 provision of up to 900 m² is provided for neighbourhood level retail and community facilities. No specific types of retail are required by the Local Plan other than the A use classes and D1 / D2 (see more below), however E1 does indicate the type of uses already in the centres through Venuescore and each policy will be subject to the authority's monitoring report.

SP17, Site HT1 is for provision of approximately 700 homes Within SP17 provision of up to 500 m² is provided for neighbourhood level retail. No specific types of retail are required by the Local Plan other than the A use classes and D1 / D2 (see more below), however E1 does indicate the type of uses already in the centres through Venuescore and each policy will be subject to the authority's monitoring report.

SP18, Site GA2 is for provision of approximately 600 homes Within SP18 provision of up to 500 m² is provided for neighbourhood level retail. No specific types of retail are required by the Local Plan other than the A use classes and D1 / D2 (see more below), however E1 does indicate the type of uses already in the centres through Venuescore and each policy will be subject to the authority's monitoring report.

Please note that SP18 states ' 500 m² (net) of A1-class floorspace. This should read A-class floorspace. This is a proposed amendment.

SP19 – Site EL1, 2 and 3 BA1 is for provision of approximately 2,100 homes. Within SP19, a new local centre with additional neighbourhood-level provision providing around 250 m² (net) class A1 Convenience retail provision and 850 m² (net) of other A-class floorspace is required through policy. The intention of the local centre is to trade on the growth in the capacity created by the new community. No specific types of retail are required by the Local Plan other than the A use classes and D1 / D2 (see more below), and each policy will be subject to the authority's monitoring report.

For retail ETC3 provides for the sequential test for retail uses and impact assessments. These can inform the development management of the provision of retail. In addition, ETC6 provides more detail for all of the Local Centres as listed within policy SP4. Policy ETC6 specifically provides for A1, A2, A3, A4, A5, D1 and D2 uses at the ground floor level, the requirement for loss of A1 uses to be mitigated by a new use which will maintain the general vitality and viability of the centre and other than those centres above with a higher level of allocation, an indicative limit of 500 sm for proposals within local centres.

Site Specific Allocations

HT11 and HT12 both provide for 4,000 m² of gross additional main town centre use floorspace and LG19 provides for 4,500 m², LG20 1,000 m², LG21 5,000 m² and RY12 4,000 m² gross additional main town centre use floorspace. These policies are site specific and contain specific bullet points regarding considerations to be taken into account in the design of any proposals. No specific types of retail are required by the Local Plan however these allocations are subject to policies ETC3 regarding sequential tests and impact assessment. In terms of impact assessment local thresholds have been calculated for Hitchin at 2,500 m², Letchworth Garden City at 1,000 m² and Baldock, Royston and elsewhere at 500 m². In addition, these allocations are subject as appropriate to policies ETC4 primary shopping frontages and ETC5 secondary shopping frontages and each policy will be subject to the authority's monitoring report.

Hitchin. There are some small scale additional retail permissions which could accommodate some retail space in the short term. In the short/medium term refurbishment of the Churchgate Centre could offer an increase of up to 500 m² in both the amount and quality of floorspace in this area. In the medium to long term the Churchgate site (HT11) (up to 4,000m²) and Paynes Park (HT12) (up to 4,000m²) could deliver up to 8,000 m² of additional floorspace for mixed use development. Hitchin currently attracts 12% of its comparison trade from the Letchworth Garden City, Baldock and Royston areas, therefore in the longer term floorspace demand could be diverted back to Letchworth Garden City as there are no additional site opportunities in Hitchin. This would provide a more sustainable pattern of development. The Council will work with potential developers and other interested parties to bring forward potential development sites as part of a review of the Hitchin Town Centre Strategy. The Strategic Site at Highover Farm has the potential to provide 500 m² of floorspace which could help achieve floorspace in the medium term as well.

Letchworth Garden City. In the short to medium term filling vacant shops should be the priority. The permissions at Garden Square and the Travel Inn add additional choice and increased town centre floorspace. In the medium to long term the town

centre area provides a number of opportunities that could accommodate mixed use development including the Wynd (up to 4,500 m²), Gernon Road (up to 1,000 m²) and Arena Parade (up to 5,000 m²). These would help meet the longer term need and also accommodate additional provision recaptured from Hitchin and provide space that can't be accommodated in Baldock. The Council will work with the Heritage Foundation and other interested parties to bring forward potential development sites as part of a review of the Letchworth town centre strategy.

Royston. Filling vacant shops and the recent permission for an M&S Foodhall and Aldi on the edge of the town meets most need up to 2026, however the allocation of the Town Hall Site (4,000 m²) within the town centre is needed for medium to long term.

Baldock. Expansion of the Tesco store has previously been permitted, although this has now lapsed, but if reconsidered would meet Baldock's need up to 2026. There are few development opportunities within the town centre and in the longer term the strategic site North of Baldock could accommodate additional future provision together with transferring need to Letchworth Garden City.

Local Centres. Within Local Centres it is harder to quantify the precise quantum of development that may be required over the plan period, because the findings of the retail study do not provide very fine grain projections. Local centre vary in terms of scale and location across the district. Nevertheless, the proposed urban extensions/strategic sites are allocated additional retail floorspace based on the retail study and the projections for each town.

There are neighbourhood centres in Hitchin, Letchworth Garden City and at Great Ashby and also village centres in Knebworth, Codicote and Ashwell. The approach taken in the draft plan in policy ETC6: Local Centres seeks to prevent the loss of facilities. In terms of future provision, growth of these centres is best delivered through the planning application process as they each serve small areas and the subtleties of demand are too small to plan proactively for. Allocating a site in one location for the need identified above would only serve to distort the function of that particular centre.

In 2015 there were 219 units in all local centres, 13 of which were vacant. This suggests a vacancy rate of 5.9%, denoting a healthy retail environment.

The broad locations of the district's local centres are identified on the draft policies map. The extents of the local centres (at 2016) are detailed in the Communities Chapter of the Local Plan.

Urban Extensions

Four of the urban extensions/strategic sites are specifically allocated additional floorspace in the quantitative forecasting in the retail study (the other 2 are

incorporated in town wide projections) and provide an opportunity to deliver additional retail development that will need to be accounted for in the overall provision in the long term.

The retail study update [E1] provides indicative figures for these types of developments; however the allocations to the north-east of Great Ashby and east of Luton need to be agreed with the appropriate neighbouring authorities to ensure that there is no double counting and ensure that market share figures match.

New retail development within the strategic sites will create new local centres in the form of neighbourhood centres. These new centres will be covered by Policy ETC6 as and when they are delivered.

The retail study at Para 5.12 states “It will not be necessary to bring forward opportunities to accommodate longer term growth after 2026, and these long term projections will need to be monitored and kept under review. Broad areas where long term growth may be accommodated should be identified, and if necessary brought forward if the projected levels of growth are achieved.”

Sites are identified where they are needed up to 2026. Post 2026, the Council has identified that Letchworth Town Centre provides a number of opportunities to meet long term needs; however, this requires further discussions with landowners as currently it contradicts retail demand evidence in Letchworth Garden City. In the medium term the Council will start to review the town centre strategies in order to take account of progression of residential allocations and to meet long term retail need. In reviewing the strategies, a pragmatic approach will be followed which will allow for a more detailed assessment of each of the town centres and the wider town centre areas, where the Council’s growth strategy; changes in retail demand/patterns and the economic climate will be taken into consideration.

Towards the middle of the plan period we expect that retail development will also start to be delivered within the strategic sites, therefore we need to keep these figures under review to ensure that the new centres that come forward are of an appropriate scale and do not negatively impact on the district’s existing town and local centres.

Appendix 2 – Primary and Secondary Retail Frontages

Hitchin

The Hitchin Town Centre Boundary reflects the 1996 Local Plan and Hitchin Town Centre Strategy (2004). It includes a large area around the Primary Shopping Area, reflecting the nature, extent and function of the town centre. The primary and secondary frontages have been amended from the previous extents within the 1996 Local Plan to consolidate the Primary Frontage to the main part of the High Street, Bancroft and Market Square areas. Secondary frontage extends along Bancroft, Sun Street, Bridge Street, Hermitage Road and Brand Street. The areas of secondary frontage are quite extensive reflecting the wide variety of non-retail uses and the thriving night time economy.

Letchworth Garden City

The Letchworth Town Centre Boundary reflects the Letchworth Town Centre Strategy (2007). This is slightly different from the 1996 Local Plan boundary as it includes the additional area around Broadway Gardens. The primary and secondary frontages have been amended to concentrate the primary shopping frontage in a circuit through Garden Square Shopping Centre along Eastcheap, the western part of Leys Avenue and along Commerce Way. The more peripheral areas along Station Road, the eastern end of Leys Avenue, Arena Parade and Broadway are classified as secondary frontage. Non-retail uses are becoming more common in the town centre and consolidating the retail uses in the centre will allow a wide variety of uses across the town and enable flexibility.

Baldock

The town centre boundary reflects the 1996 Local Plan and Baldock Town Centre Strategy (2006). The extent of secondary frontage has been refined to the west to take account of changes from town centre uses to residential; however, the area to the north of Whitehorse Street has been included in secondary frontage reflecting the mix of uses that exist in this area.

Royston

The town centre boundary reflects the 1996 Local Plan and Royston Town Centre Strategy (2008). The Primary Frontage has been consolidated along the main centre core of the High Street. Secondary frontage extends along Fish Hill, Melbourne Street and Kneesworth Street to allow more flexibility and range of uses within the wider town centre area.