East Herts District Plan

Examination Hearing Statements

Matter 3: The Development Strategy

Employment and Retail

Matter 3: The Development Strategy - Employment and Retail

Issue:

Has the Plan has been positively prepared and is it justified, effective and consistent with national policy in relation to the overall provision for employment and retail?

Employment and retail – DPS1

Question 1

What is the overall quantity of employment land required to meet the projected and planned needs of the district? Where is the evidence to demonstrate that the Plan would meet this requirement?

1. The Employment Topic Paper (TPA/005) sets out the evidence base for the submitted District Plan.

2. Further work is currently being prepared by Hardisty Jones Associates (HJA) to understand the employment land needs associated with the full objectively assessed housing need (FOAN) set out in the updated OAN Report (ED112). This work is being undertaken across the Functional Economic Market Area (FEMA) in collaboration with the Housing Market Area authorities (Epping Forest, Harlow and Uttlesford Councils). Initial conclusions indicate that for East Herts, there is a need for circa 3 to 7 hectares of office land and 13 hectares of industrial land between 2016 and 2033 (a total of between 16 and 20 hectares). This is set out in Appendix 1 to this Statement. The four authorities will also be preparing a Memorandum of Understanding setting out how the needs of the FEMA will be met.

3. The District Plan currently allocates three new employment areas:

   - 4-5 Ha at Bishop's Stortford South
   - 3 Ha at North and East of Ware
   - 3 Ha at Buntingford Business Park

   The sites at Bishop's Stortford and Ware are located on strategic allocations and will therefore be delivered through residential-led development. Masterplanning is currently being progressed at both locations. Statements of Common Ground are being prepared with both site promoters to this effect. The land to the north of Buntingford Business Park is proposed as an extension to the existing business park where the Council itself has an interest. This land was put forward through the Call for Sites and has been assessed as being available, suitable and achievable in the Strategic Land

Availability Assessment (HOP/004). These three sites will together provide between 10 and 11 hectares of employment land as set out in the Submission District Plan.

4. In terms of the emerging FEMA evidence, it is proposed that a main modification to the Plan be agreed which amends Policy GA1 The Gilston Area to require the provision of 5 hectares of Employment Land to be delivered either through a standalone business park, or through the neighbourhood centres (see Question 2 below).

5. In addition, it is proposed that a main modification is made to allocate 6 hectares of employment land currently used as an aggregate crushing plant to the East of Welwyn Garden City, which is part of a larger site of 10 hectares, (4 hectares of which lies within Welwyn Hatfield Borough). This land is adjacent to existing employment land at The Holdings and is well located in relation to existing businesses along the main route in to Welwyn Garden City, and will therefore be suitable for B1, B2 and B8 uses should the aggregate operation relocate or close in the future.

6. With the additional provision of Employment Land at the Gilston Area, the Plan will accommodate between 15 and 16 hectares, with the potential to increase further to between 21 and 22 hectares depending upon a change of operation of land to the East of Welwyn Garden City. It is also anticipated that in line with recent trends, further employment land will be created through windfall developments over the Plan period. Between 2011 and 2016 more than 13 hectares of employment land were completed across the District.

- 3 Ha at Buntingford Business Park
- 4-5 Ha at Bishop's Stortford South
- 3 Ha at North and East of Ware
- 5 Ha in the Gilston Area

Question 2

What options were considered for the overall provision for employment land? When and how were these options considered? Why was the preferred option chosen ahead of other options? What evidence informed this decision?

1. The initial Plan-making stages included several assessments of potential approaches to the location of employment land across the District. These are detailed in the East Herts District Plan Supporting Document (SSS/001). Step

2 of the 'stepped approach' contained a Strategic Overview of the Economy which described the economic issues faced in East Herts and set out how these issues would be addressed through the different 'steps'. Step 3 comprised the Employment Topic Assessment, where 69 Areas of Search were appraised for their potential to contribute towards the supply of employment land. Four criteria were considered; accessibility, visibility, proximity and clustering. Step 5 tested a number of scenarios at a settlement level considering the cumulative effects of different development options. In terms of economic development, four additional criteria were considered for each settlement. These included whether the shortlisted Areas of Search, in the context of the settlement as a whole, created opportunities for jobs growth in the locality and in the wider travel to work area, whether there were barriers to investment, and whether there were prospects for additional employment provision.

2. A number of specific studies that look at employment land needs have been undertaken. These are summarised in the Employment Topic Paper (TPA/005). The Employment Land Review of 2008 (EER/010) was undertaken just before the economic crash and used 2006 forecasting data. This was therefore updated in 2013 through the Employment Forecasts and Strategic Economic Development Advice (EER/002) and Employment Land Review Update (EER/004).

3. The Employment Forecasts and Strategic Economic Development Advice (EER/002) recognised in particular the importance of Bishop's Stortford as the location within East Herts with the greatest opportunities to maximise economic development growth, given the town's proximity to both the M11 and Stansted Airport. At the same time, the Council was also in the process of determining the Bishop's Stortford North planning applications (3/13/0804/OP and 3/13/0886/OP). As such, the Town Wide Employment Study for Bishop's Stortford was commissioned in 2013 (EER/007) in order to better understand specific opportunities for new employment land within the town.

<u>Bishop's Stortford</u>

4. Section 8 of the Bishop's Stortford Town Wide Employment Study (EER/007) considered the different types of new employment land that would be suitable for Bishop's Stortford based on discussions with local commercial agents and an understanding of employment land requirements. The Study then appraised a variety of existing location options; sites within the town centre, existing employment areas and sites within Uttlesford District (primarily at Stansted Airport). Six potential locations were considered for a business park style development, suitable, predominantly for B1 uses:

- Location A: the Bishop's Stortford Football Club adjacent to Woodside Industrial Estate. Since the study was completed the Council considers that Location A is not considered deliverable as it is reliant on the relocation of the football club.

- Location B: the Birchanger Site adjacent to the Goodliffe Park Industrial Estate. This site lies within Uttlesford District. East Herts Council have made representations to the Uttlesford Local Plan consultations requesting that this site is removed from the Green Belt and allocated for employment purposes. However, Uttlesford Council do not wish to allocate the site.

- Location C: The Mountbatten Site, between Hazeldene Road, Farnham Road and the A120. This area has recently received permission for over 300 homes on land known as ASR5, which is part of the Bishop's Stortford North site.

- Location D: The Foxdells Farm Site, west of Bourne Brook. This site lies within the Bishop's Stortford North application site. This site received permission for residential-led development with approximately 12,000 sq.m of employment land over two neighbourhood centres.

- Location E: The Hadham Road Site, at the junction of the A120/A1184 and A1250 to the north of Tesco. This site is also within the Bishop's Stortford North site.

- Location F: South Stortford, bounded by St James Way, Whittington Way and Thorley Street. This area forms the proposed allocation known as Bishop's Stortford South, where 4-5 hectares of employment land are proposed as part of the development.

5. Land to the south of Bishop's Stortford was one of the least preferred locations in the Study given its less attractive location when compared to other potential sites. However, the more preferred options are either prejudiced due to committed development schemes or are not currently considered to be deliverable. The town centre sites are continuing to be explored through the masterplanning process. Therefore, the land to the south of Bishop's Stortford remains the only suitable option.

Buntingford

6. When the 2014 Preferred Options District Plan (PDP/001) was published a number of planning applications were submitted on sites in Buntingford that did not form part of the development strategy contained within the Plan. In response to these applications and in order to better understand the specific

economic issues and employment land options in the town, the Buntingford Employment Study (EER/006) was prepared. The study explored options for expanding 5 existing employment areas:

- The Former Sainsbury's Depot Site: located to the south east of the town, with access to the A10, this site was previously a distribution depot for Sainsbury's supermarket covering 10.94 hectares, which has now been redeveloped for predominantly residential purposes. The Study recommended that 2-3 hectares of the land should be retained for employment purposes which would be suitable for B1 and B2 uses which would complement the other business parks in the town. Policy BUNT2 of the Preferred Options Plan referred to the need to set aside a proportion of land for employment uses, while BUNT4 referred to 'new small-scale employment' being supported as part of mixed use schemes to the north and south of the town. However, since the Preferred Options consultation, permission has been granted on part of this intended employment land for a residential care home. In addition, Hertfordshire County Council is pursuing the remaining part of the employment area for a first school site. The Settlement Appraisal for Buntingford (SSS/003) explains this further. Whilst not in B uses, care homes and schools are employment generating uses, and are considered to provide a mixture of part and full time local employment opportunities.

- Buntingford Business Park: located to the west of the town at the intersection of the A10 Buntingford bypass and the B507 Baldock Road. The study identified the potential to accommodate 1.5 hectares at Buntingford Business Park within the existing site envelope plus an additional 3 hectares to the north of the existing site, which is proposed as an Employment Land allocation in the emerging District Plan. This land would be suitable for larger units, which could accommodate B2 and B8 uses.

- Park Farm Industrial Estate: located to the north of the town off Ermine Street, this estate comprises small units, though some amalgamation of units provides larger space for some occupiers. The study identified the potential to accommodate 1.58 hectares to the north of the estate. Since the study was completed, land at Park Farm Industrial Estate has been approved on appeal for residential uses (3/16/1391/FUL). Therefore, opportunities to expand the estate have now been lost.

- Watermill Industrial Estate: located towards the south west of the town is a well-performing but constrained site in need of modernisation. The study identified the potential to accommodate a further 1.47 hectares to the north

of the estate, which would be made more attractive through a new point of access. This area is subject to a current planning application (3/17/1861/FUL) for 17 B1 units of 140 sq.m each, a total of 2,350 sq.m.

- Silk Mead Industrial Estate: is a small complex located in nearby Hare Street village, catering for local businesses in B2 use. No opportunities for growth were identified at this estate.

Hertford and Ware

7. In June 2016, the Council commissioned a Hertford and Ware Employment Study (EER/005). This study appraised 14 existing employment areas across the two towns, and explored a variety of issues affecting the demand for employment in the joint study area, including the introduction of Permitted Development rights. The study, which recognises the close proximity and interrelationship between the two settlements and their markets, recommends that the Council: investigates options for providing shared business space, possibly in the public sector estate at Pegs Lane; that a strategy is developed to stem the ongoing loss of employment floorspace in combination with a strategy for the improvement; and, re-provision of employment land at an attractive strategic location such as at the intersection of the A10 and A414. The proposed allocation to the North and East of Ware has been selected to meet these aims for the provision of 3 hectares of new employment land, which would be of benefit to both towns and could be delivered through the largely residential-led development. The site is considered likely to be attractive to businesses being located in an area which is highly accessible to the A10 and close to both the existing Gentleman's Field Business Park and GSK. It is also envisaged that this location will be well served by public transport as a result of the delivery of the residential development.

Other Locations

8. In respect of other locations in the district, the Council is proposing to allocate 6 hectares of land to the east of Welwyn Garden City as employment land through a main modification to the Plan. This site is visible and accessible, is well-located in relation to existing employment areas and will be accessible to new public transport opportunities delivered as part of the allocation. This site straddles the local authority boundary, and as such an additional 4 hectares lies within Welwyn Hatfield Borough. The emerging Welwyn Hatfield Local Plan also allocates this site as employment land - EA11 Cole Green Lane, Welwyn Garden City alongside land at The Holdings. The site is part of an allocated waste site, which was granted permanent planning permission for an aggregate crushing plant in 2016 having operated with temporary permissions for some years before that. The proposed allocation as employment land recognises this permission and facilitates the continued use of the land for

employment purposes, should the current operation cease or relocate later in the Plan period.

9. The emerging FEMA study referred to in paragraph 1.2 above indicates that there is an anticipated growth in jobs within the core area of the London Stansted Cambridge Corridor (LSCC) as referenced in Question 4 below. This is largely due to the success of the Harlow Enterprise Zone, combined with the growth at Stansted Airport. The previous proposals for the Gilston Area deliberately omitted the requirement to provide new employment land in order to not prejudice the development of the Harlow Enterprise Zone. The 2012 Employment Land Forecast Study (EER/002) noted the factors which would reduce the success of employment land in the Gilston Area. However, since 2012, the four HMA authorities have committed to the delivery of a second crossing over the River Stort, a new Junction on the M11 (Junction 7a) and the development of a sustainable transport corridor which will connect development to the north and south of Harlow, which will be delivered through the Garden Town programme. The proposed development of 10,000 new homes at the Gilston Area is well-placed to accommodate new employment land, which will complement employment land in Harlow as well as contributing towards the creation of sustainable communities with access to local employment opportunities. The Council is therefore proposing to make a main modification to Policy GA1 – The Gilston Area to require the provision of 5 hectares of new employment land, either through a standalone business park, or through mixed use neighbourhood centres.

Question 3

How does the quantity of employment land identified in the Plan relate to jobs growth?

1. The assessment of land requirements takes direct account of the forecast changes in jobs. The Economic Evidence to Support the Development of the OAHN for West Essex and East Hertfordshire (EER/002) and the emerging FEMA level work being undertaken by Hardisty Jones Associates (HJA) detail the relationship between the proposed growth in the local labour market, job creation and the resultant employment land needs. The forecasts are based on the East of England Forecasting Models (EEFM). The EEFM uses various data sources produced by: the Office for National Statistics; the Business Register and Employment Survey (BRES) and its predecessor the Annual Business Inquiry (ABI); the Annual Population Survey (APS): and, the Jobs Density series. Future jobs growth is divided into job type job using Standard

Industrial Classifications (SICs). These are converted and grouped into 'B Uses', from which a proportion is deducted to take account of jobs which do not result in the need for traditional employment land, such as service jobs and the self-employed, for example, and then calculated against standard employment density ratios to give a floorspace forecast.

2. The employment evidence also considers the need to replace land lost to other uses such as through office conversions as well as the need to ensure that sufficient opportunities exist to accommodate the replacement of land or premises that are no longer fit for purpose. It considers the proportion of jobs that do not result in a direct need for 'traditional employment land' such as those jobs in service, education and health industries and home workers for example. It also takes account of proposals which result in the reuse and intensification of existing employment land such as through the Harlow Enterprise Zone and the relocation of Public Health England into an existing Employment Land campus.

3. The additional proposed allocations will ensure that sufficient land is available across the Plan period to facilitate new or expanding businesses which will provide new jobs.

Question 4

What is the influence of economic growth expected from the London Stansted Cambridge Corridor Core Area on the Plan in terms of the need/demand for employment land and the creation of jobs?

1. Growth in the area is being promoted by the London Stansted Cambridge Corridor (LSCC) Growth Commission which aims to raise the global economic potential of the LSCC, setting out a vision for transformational change. The Commission's report, published in July 2016, argues that the LSCC has the hallmarks of a national asset: a fast-growing population, vibrant economy, and presence in globally traded economic activities[1].

2. Over the past five years the Corridor's dynamic, knowledge-based economy has grown at a rate almost double that of the UK average. Transport links are excellent; with two major rail routes – the East Coast and West Anglia mainlines – serving the Corridor. The A1(M), A10 and M11 motorway link its

[1] London Stansted Cambridge Corridor Growth Commission (2016). Findings and Recommendations of the London Stansted Cambridge Corridor Growth Commission www.lsccgrowthcommission.org.uk/wp-content/uploads/2016/07/LSCC-Growth-Commission-Final-Report-full.pdf

towns and cities with the capital, while London Stansted Airport offers international connections. The continued success of the Corridor provides the opportunity for the Core Area to deliver greater and lasting prosperity for its residents and businesses. As such the Council is working with its partner authorities in the Core Area to deliver the LSCC strategic vision as set out in Section 2.6 of the District Plan.

3. The emerging work being undertaken by Hardisty Jones Associates (HJA) takes into consideration the wider aspirations of the LSCC Core Area. The Assessment forecasts a variety of scenarios including the relocation of Public Health England to the former GSK site in Harlow, which is part of the LSCC ambition to capitalise on and promote the growth of life sciences and pharmaceuticals; considers the growth plans for Stansted Airport leading to an additional 10,000 jobs; takes account of the ambitions to deliver growth at the Harlow Enterprise Zone; and considers an option for the relocation of the Princess Alexandra Hospital in Harlow. Linked to these initiatives is the delivery of a new junction on the M11 (J7a).

Question 5

Is the land identified for class B1/B2/and B8 of the right type and scale and in the right place to support sustainable growth?

1. The three new allocated sites (south of Bishop's Stortford, north of Buntingford Business Park and north and east of Ware) are of a scale which will facilitate a variety of uses, both office and small scale industrial uses. Whilst it is not envisaged that large warehouse style businesses would be attracted to these locations given the economic geography of the sub-region, where other larger towns are better connected to the principal road network, the scale and location of the proposed allocations would make this use possible. For comparison purposes, Woodside Industrial Estate in Bishop's Stortford is approximately 5 hectares in size, the western part of the Crane Mead Industrial Estate in Ware is just over 3 hectares in size and the existing Buntingford Business Park is approximately 2 hectares. These existing sites accommodate a variety of businesses, mainly in B1 and B2 use, but some small B8 businesses also operate successfully from these small, mixed sites.

2. Each of the allocations is located on main roads and will be easily accessible. Three studies have been undertaken which consider the employment needs and opportunities in Bishop's Stortford (EER/007), Buntingford (EER/006) and Ware (EER/005). The Bishop's Stortford study identifies land to the south of

Bishop's Stortford as being a good location for employment uses, though this area is less preferred than areas to the north of the town, which are more accessible to the M11. The Buntingford study identifies the extension to the Business Park as being a suitable location for less neighbourly uses including B2 and B8 uses. Currently in use as the Council depot, office space is also suitable in this location. The Hertford and Ware study identified a need for new employment land and suggests that land closer to the A10 would be most suitable given the constraints of the two towns.

3. The proposed designated sites are considered the best available locations to achieve the sustainable development ambitions of the Plan, whilst performing well against the factors commonly considered for employment land; visibility, proximity to other businesses, accessibility, compatibility with neighbouring uses and flexibility. The three sites are also close to centres of population growth, creating new employment opportunities for new and existing residents, in locations well connected to public transport.

Question 6

Is the delivery of this amount realistic? Would land be available?

1. Land at Bishop's Stortford South will come forward through the residential-led development. The details and phasing of the delivery of this land will be determined through detailed masterplanning. It is anticipated that the employment land will be available towards the end of the housing delivery, but opportunities to bring its delivery forward are being explored. A Statement of Common Ground is currently being prepared which describes the intention to deliver 4-5 hectares of employment land. Current masterplanning considerations locate this area to the south-east corner of the site, with access from the A1184 southern distributor road St James Way.

2. Employment land of 3 hectares is planned within the Site Allocation to the North and East of Ware (WARE2) through residential-led, mixed use development. The locational details and phasing of the delivery of this land will be determined through detailed masterplanning. While the Masterplanning process, which will determine the final location/s of the employment provision, has yet to formally commence, the site lies in close proximity to the A10 and the wider strategic road network, which would be attractive to inward investors. The Statement of Common Ground confirms the intention of the site promoter to deliver 3 hectares of employment land as part of the mixed-use development.

3. The land north of Buntingford Business Park was identified through the SLAA process, (HOP/004, Site 09/001). The site was considered suitable, available and achievable subject to an extension to the business park through an allocation in the emerging District Plan. The Council will work with the land owner to bring this land forward.

4. In terms of land at the Gilston Area, a Statement of Common Ground is being prepared with the site promoter. Details of phasing and delivery will be determined through ongoing masterplanning work.

Question 7

How has the need for retail floor space and the type of retail floor space required been identified for the plan period?

1. The emerging Plan does not allocate specific land to accommodate retail uses. However, the Plan does define Primary Shopping Areas with Primary and Secondary Frontages within a new Town Centre boundary. In addition, new neighbourhood centres will be created through the strategic allocations.

2. The East Herts Retail and Town Centres Study, 2013 (EER/008) was a comprehensive assessment of retail needs of the district related to the proposed growth in households between 2013 and 2031. The Study takes current expenditure levels and makes forecasts based on assumed population increases, spending patterns and economic recovery rates. From these forecasts the study calculates how much floor space could be needed throughout the Plan period for convenience and comparison goods. The study takes account of sub-areas and potential growth locations and considers the availability of vacant land, completions and commitments as well as competition from nearby higher order centres.

3. Tables 7.1 and 7.2 of the Study indicate that the projected floorspace needs are for 7,100 sq.m (net) of convenience goods floorspace, and 5,700 sq.m (net) of comparison goods floorspace between 2013 and 2031, a total of 12,800 sq.m (net). This takes into account completions and commitments, but not the potential re-use of vacant premises. These two tables also indicate the spatial distribution of this floorspace across the five main settlements and across the rest of the district. It is noted that the figures included with Policy DPS1 (Housing, Employment and Retail Growth) of the District Plan are incorrect and a main modification will be required to rectify this position.

Matter 3: The Development Strategy - Employment and Retail

4. In 2014 the Council commissioned a 'critical friend' style study undertaken by Peter Brett Associates (EER/009), to assist in understanding how to plan for wider retail trends and national policy changes within the District Plan. This second study confirmed the declining trend in traditional A1 uses within town centres and advocated flexibility in the policy approach for town centre uses. Section 10 of the study discusses whether the Council should seek to allocate additional floorspace. It concludes that beyond planned redevelopment proposals in Hertford and Bishop's Stortford, the Council should focus on improving existing town centre stock and the public realm and should plan for convenience and comparison floorspace in the form of local centres within the planned urban extensions.

Question 8

Where does the Plan make provision for the location of the required retail floor space? Can it be delivered over the Plan period?

1. In addition to identifying the overall retail floorspace needs for the District, the Retail and Town Centres Study (EER/008) identified specific floorspace needs for each of the five market towns.

Bishop's Stortford

2. The Study identified a need for 4,300 sq.m of new retail floorspace in Bishop's Stortford. Taking into account the potential redevelopment of 1,200 sq.m of vacant floorspace, 3,100 sq.m of retail floorspace would be required. This figure was in addition to that already committed, which included the previously approved redevelopment of the site known as Old River Lane (Policy BISH8), which has since lapsed. The Council now owns this site and is exploring options for the redevelopment of the site through the publication of a Town Centre Planning Framework. While the retail floorspace to be delivered is not currently known, it is expected that this site will be delivered within the Plan period.

3. The Plan proposes two new neighbourhood centres, to be provided as part of Bishop's Stortford North (BISH3). The approved scheme proposes up to 1,200 sq.m of A class uses. Construction on this site has already started and is therefore expected to be delivered during the Plan period.

4. A new neighbourhood centre will be provided through the Bishop's Stortford South allocation (Policy BISH5), which is being explored through the masterplanning process. Comprising a mix of retail and community uses, this could be in the region of 1,000 sq.m of retail floorspace.

5. A small amount of retail floorspace may also be provided through the redevelopment of the Goods Yard.

Buntingford

6. The retail floorspace projection in Buntingford is 600 sq.m net. The study however, indicated that intensification of the existing town centre would be the most realistic means of creating new floorspace.

Hertford

7. The Study identified a need for 3,200 sq.m of new retail floorspace, in addition to that already committed. The Study also states that approximately 1,400 sq.m net floorspace is also vacant (at the time of the study), leaving a 'to find' figure of 1,800 sq.m net. There is considerable retail interest and activity in Hertford, with active proposals for the redevelopment of the Bircherley Green Shopping Centre, which is a key part of the Primary Shopping Area of Hertford Town Centre.

Sawbridgeworth

8. The Study identified a need for 1,400 sq.m of new retail floorspace. However, the Study also acknowledged the relationship between Sawbridgeworth and its larger neighbouring centres of Bishop's Stortford and Harlow and indicated that any new retail floorspace provided as part of the Gilston Area development may serve the retail needs of Sawbridgeworth residents.

Ware

9. The retail floorspace projection for Ware is 1,200 sq.m net beyond that committed through the Asda supermarket proposal, which is now built and in operation. The study also states that approximately 600 sq.m net floorspace is also vacant (at the time of the study), leaving a 'to find' figure of 600 sq.m of retail floorspace. The proposed allocation to the North and East of Ware will deliver a new neighbourhood centre containing a mix of retail and community uses.

Gilston Area

10. The Study suggested that the proposed development of 10,000 homes in the Gilston Area could support approximately 9,000 sq.m (gross) of A class floorspace. The emerging masterplan contains seven neighbourhood centres, within which day-to-day retail and community service uses will be located alongside employment uses.

East of Stevenage

11 Policy EOS1 requires the development of a neighbourhood centre to be provided as part of the development. It is likely that given the scale of

development and the proximity of an existing large supermarket, that only small scale convenience units could be accommodated at this strategic location. The details of this are being explored through the masterplanning process.

East of Welwyn Garden City

12 Policy EWEL1 requires two neighbourhood centres to be provided as part of the development, effectively to serve the different parts of the site located within East Herts and Welwyn Hatfield. The details of these centres are being explored through the masterplanning process but, again, will be of a scale that serves the day-to-day needs of the surrounding community. There is a large supermarket within proximity of the site for larger convenience and comparison needs.

Question 9

Is there a retail hierarchy? How will the Plan promote competitive town centres and support viability and vitality?

1. The retail hierarchy as detailed in Section 16.3 of the District Plan is as follows:

   - Principal Town centre: Bishop's Stortford
   - Secondary Town Centre: Hertford
   - Minor Town Centres: Buntingford, Sawbridgeworth and Ware

2. In addition to the town centres, there is one District Centre, one neighbourhood centre, 11 Local Parades and individual shops across the district. In order to ensure that the new centres proposed at the strategic developments do not compete with the Town Centres, they will be of a scale suitable to meet the day to day retail and service needs of the neighbourhood within which they are located.

3. The proposed retail policies are designed to support retail development in principle, where they are located within the defined Town Centre boundaries and where they contribute to maintaining the role and function, viability and vitality of the town. The policies require a sequential approach to the location of development in order to ensure developments are located appropriately. Outside the Primary Shopping Area impact assessments are required for proposals over particular floorspace thresholds in order to understand the

effects of development in accordance with the NPPF. These thresholds take account of the character of existing units and the projected floorspace needs.

Question 10

Is there sufficient scope to provide a range of suitable sites to meet the scale and type of retail and other uses needed in the town centres?

1. The Plan seeks to direct town centre uses towards the defined Town Centre boundaries and within new neighbourhood centres provided as part of the proposed strategic developments. Combined, the town centres of Bishop's Stortford, Hertford and Ware comprise 56.08 hectares, in addition to the smaller, more constrained centres of Buntingford and Sawbridgeworth. Within these centres retail and other complementary Town Centre uses would be acceptable in principle, subject to the safeguards set out in Policy RTC1 (Retail Development).

2. The Plan defines Town Centre boundaries around each of the District's town centres. In addition, three Primary Shopping Areas (PSAs) are also defined in Bishop's Stortford, Hertford and Ware town centres. The PSAs wrap around the Primary and Secondary Shopping Frontages, reasonably tightly, but the Town Centre Boundaries extend some distance from the PSA, within which all Town Centre uses will be supported in principle, as illustrated in the Table below. This provides flexibility for new retail and other commercial uses to locate within the Town Centre, whilst maintaining the importance of the Primary Shopping Area.

Areas of opportunity for retail/commercial development

Town	**Primary Shopping Area (Ha)**	**Town Centre (Ha)**	**Area within which new Town Centre development would be deemed suitable in principle (Ha)**
Bishop's Stortford	10.23	22.23	12
Hertford	7.11	17.40	10.29
Ware	4.64	16.45	11.81
TOTAL	21.98	56.08	34.1