OVERVIEW AND SCRUTINY COMMITTEE

11 NOVEMBER 2025

*PART 1 – PUBLIC DOCUMENT

TITLE OF REPORT: DRAFT TOWN CENTRES STRATEGY

REPORT OF: NIGEL SMITH, DIRECTOR: PLACE

EXECUTIVE MEMBER: CLLR. DONNA WRIGHT, PLACE

COUNCIL PRIORITY: THRIVING COMMUNITIES / ACCESSIBLE SERVICES /

RESPONSIBLE GROWTH / SUSTAINABILITY

1. EXECUTIVE SUMMARY

- 1.1 The adopted <u>Local Plan 2011-2031</u> stipulates that the Council "prepare and maintain upto-date town centre strategies to support its strategic policy approach and / or adapt to change. These will be used to inform the approach to retail at the time of the early review of the Local Plan".
- 1.2 As such, we are preparing an overarching Town Centres Strategy to
 - provide additional guidance to Local Plan Policies: ETC3: New retail, leisure and other main town centre development, ETC4: Primary Shopping Frontages, ETC5: Secondary Shopping Frontages and SP4: Town Centres, Local Centres and Community Shops;
 - Set out the Council's planning priorities for its town centres which can be given appropriate weight in relevant planning decisions; and
 - Act as a 'bridging document' pending the approved review of the Local Plan.
- 1.3 As an interim tool until any new Local Plan is progressed and adopted, the Town Centres Strategy seeks to provide the necessary policy guidance to maintain each town's unique successful qualities and place identities. It will offer good practice guidance to developers and relevant stakeholders when developing proposals and policy advice to development management officers when determining planning applications. It will also seek improvement for town centre vitality and viability within a planning context, whilst referencing other council strategies (including the Council Plan, the Economic Development and Sustainability strategies).
- 1.4 The draft Town Centres Strategy will (subject to Cabinet approval) be issued for public consultation in late 2025 with a final version anticipated to be presented for adoption in early 2026.

2. **RECOMMENDATIONS**

That Overview and Scrutiny Committee recommend:

- 2.1. That the draft Town Centres Strategy (attached as Appendix A to this report) and its associated Appendices be endorsed and approved for public consultation.
- 2.2 That delegated authority is granted to the Director, Place in consultation with the Executive Member for Place to make any minor non-material corrections, including but not limited to cosmetic additions or presentational alterations, to the draft Town Centres Strategy as considered necessary for the public consultation.

3. REASONS FOR RECOMMENDATIONS

- 3.1. To allow the draft Town Centres Strategy to be progressed to public consultation so that it may be developed and eventually adopted as a material planning consideration to support developers, landowners and relevant stakeholders when considering developing proposals and to provide policy advice to development management officers when determining planning applications until superseded by any new Local Plan.
- 3.2. To set key priorities which seek to maintain and enhance the unique character and vitality and viability of the district's four town centres through agreed partnership working.
- 3.3. To reinforce and deliver the Council's ambitions as set out in the Council Plan (2024 2028).

4. ALTERNATIVE OPTIONS CONSIDERED

- 4.1. The Council could rely solely on the Local Plan for all matters relating to town centres instead of publishing a Town Centres Strategy. However, policy elements of the Local Plan, particularly those relating to significant development, town centres first approach, and land use class considerations require further clarification and guidance which can be provided through the Town Centres Strategy to help implement the Plan and achieve its good growth objectives. Much of the evidence underpinning the Local Plan predates, in particular, the Covid-19 pandemic which had a significant impact on the way communities across the country use and interact with their town centres.
- 4.2. The Council could have considered the creation of four distinct town centre strategies, meaning an individual piece of work per town centre with a deeper investigation, rather than this consolidated overarching singular strategy. However, creating four distinct town centre strategies would have required significantly more time, human resource and investigation. An overarching higher level Town Centres Strategy would help speed up the process and provide the necessary policy guidance for each town centre while the Local Plan is under review and help to manage speculative development proposals.
- 4.3 The Council could have produced a holistic corporate strategy for its town centres. combining the content of planning-led Town Centres Strategy with relevant projects and ambitions emerging from the Economic Development Strategy, the Churchgate redevelopment, Sustainability Strategy and other relevant workstreams. This was not

pursued from an early stage and the broad scope of the Town Centres Strategy has been agreed in consultation with Executive Members and the Council's Strategic Planning Project Board. The Local Plan is clear on the need for a planning-led strategy to perform a specific function in light of the commitment to an early review and update of the Plan. There needs to be appropriate separation(s) between the roles of the Council as Local Planning Authority and the Council as landowner / development project sponsor. The projects and documents cited above are hosted within different Directorates of the Council to perform distinct functions and / or deliver on a wider remit. Each document cross-refers to the others where relevant and appropriate.

5. CONSULTATION WITH RELEVANT MEMBERS AND EXTERNAL ORGANISATIONS

- 5.1. The Executive Member for Place has been briefed on the matters set out above.
- 5.2. In addition, consultation has taken place with the Strategic Planning Matters Project Board on the scope of the Town Centres Strategy in October 2024 with updates on its draft iterations in May, July and October 2025.
- 5.3 The comments received from the above-mentioned Project Board regarding the scope of the Town Centres Strategy and future direction of North Herts town centres have informed the current draft, resulting in improvements to the Strategy in terms of its scope and mechanisms to promote town centre vitality and viability.
- 5.4 Internal consultation with relevant officers across Council departments and external consultation with relevant key stakeholders, such as the town's Business Improvement Districts and business representatives, as well as the Letchworth Garden City Heritage Foundation, have been involved in developing the draft Strategy, including in relation to the most recent updates.
- 5.5 Regular updates on the Strategy have been provided to Cabinet through various Strategic Planning Matters Reports, together with updates in Members Information Service (MIS) in relation to the preparation of the Town Centres & Retail Study, which provides the evidence base to the draft Strategy.

6. FORWARD PLAN

6.1 This report contains a recommendation on a key Executive decision that was first notified to the public in the Forward Plan on the 13 September 2024.

7. BACKGROUND

- 7.1. The National Planning Policy Framework (NPPF) Chapter 7 (paragraphs 90 95) outlines guidance for town centre vitality. "Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation."
- 7.2. North Herts Local Plan 2011-2031 was adopted November 2022, and the Council has committed to reviewing this. The Local Plan 2011- 2031 stipulates the need for a new Town Centres Strategy; to bridge the gap between current and emerging Local Plans and provide further details and guidance to support compliance with relevant town centre policies in the existing Local Plan. The commitment to producing town centre strategies,

in combination with the broader commitment to early review, was a key influence on the Inspector's conclusions that the Local Plan was 'sound'.

- 7.3. The town centre policies for the district are set out in the Local Plan. These policies establish the amount of retail required to meet the projected population growth and also allocates parcels of land for retail-led, mixed-use development. The policies were developed through evidence gathering from experts and stakeholders and were subject to both public consultation and formal examination by the government's appointed Planning Inspector.
- 7.4. The evidence for the retail and town centre policies in the adopted Local Plan was published in 2016 and provides data to 2031. The Council commissioned consultants, Lichfields, in late 2023 to provide an up-to-date Town Centres and Retail evidence base to take account of the impact of Covid 19, online shopping, the cost-of-living increases, and new population projections to provide fresh retail needs projections to 2031 and 2036. This Study, completed in December 2024, will inform the review of the retail and town centre policies in the Local Plan and provide the necessary evidence base for the preparation of this Town Centres Strategy. This draft Strategy takes account of this updated evidence and its implications for policy and strategy development in the context of the North Herts' town centres.
- 7.5. The Council last published town centre strategies between 2004 and 2008. These were strategies for each of the four town centres in North Herts and need updating.
- 7.6. The adopted Local Plan, contains policies with implications for town centres, these include:
 - Policy SP4: Town Centres, Local Centres and Community Shops,
 - ETC3: New retail, leisure and other main town centre development,
 - ETC4: Primary Shopping Frontages and
 - ETC5: Secondary Shopping Frontages.

These policies seek to promote, protect and enhance the well-being of the town centres in the District, whilst directing sustainable development, new retail, leisure and other town centre land uses within the town centres particularly following the NPPF's town centres first approach. The frontages policies seek to ensure that the town centres maintain their primary retail function whilst increasing their diversity with a range of complementary uses, promoting competitive, flexible town centre environment.

- 7.7 The Town centres Strategy is to be read alongside other policies and supporting guidance documents in the Local Plan which will have an impact on development proposals including:
 - Policy D1: Sustainable design
 - Policy HE1: Designated heritage assets
 - Policy SP13: Historic Environment
 - Policy SP9: Design and Sustainability
 - Policy SP6: Sustainable transport
 - Policy HC1: Community Facilities
 - Policy D1: Sustainable Design
 - Policy SP10: Healthy Communities

- Developer Contributions SPD
- Parking SPD
- 7.8 The 2024 Retail and Town Centre Study has identified that there is a need to review these policies as part of the New Local Plan given changes in consumer behaviour patterns and the changing role and function of town centres in meeting these demands. The retail and town centre policies in the New Local Plan will need to be more flexible in their approach whilst ensuring that any development and improvements within the town centres contributes and strengthens the retail, economic, environmental and social benefits of the town centres as well as reinforcing each town centre's local distinctiveness as a special place to invest, live and visit.
 - 7.9 This draft Strategy therefore seeks to provide the necessary interim guidance.

8. RELEVANT CONSIDERATIONS

- 8.1. The draft Strategy incorporates advice on a range of changes in national policy and guidance and takes account of the updated evidence in the Town Centres and Retail Study (2024).
- 8.2. The draft Strategy addresses the relevant policy criteria identified in the adopted Local Plan by providing more robust guidance for developers and stakeholders that should be taken into consideration for any type of development or improvements within the town centres to promote their vitality and viability.
- 8.3. The draft Town Centres Strategy is a planning-led document and should be read in conjunction with relevant policies in the adopted Local Plan whilst also taking into consideration other important Council Strategies and projects, such as the Economic Development Strategy, the Churchgate Regeneration Zone project, the Council Plan and the Council's Sustainability Strategy. All these documents together contribute towards the Council's overall strategy for its town centres.
- 8.4. The draft Strategy has been prepared following similar principles to a Supplementary Planning Document including reference to relevant policies and evidence and stakeholder engagement in its preparation and, subject to Cabinet approval, public consultation.
- 8.5. The draft Strategy provides the overall direction of travel with clear policy guidance and priorities for each town centre to guide developers when submitting planning applications and other town centre improvements. It is based on a sound evidence base with clear connections to published policy and supplementary planning documents, including other Council and external organisations documents. These together inform the Strategy and contribute towards meeting the Council's Plan and the Local Plan goals and vision.
- 8.6. The Strategy covers a range of town centre topics including land use capacities and distributions, mixed-use needs, vacancy reoccupation, public realm quality, heritage preservation, sustainable transport, connectivity, active travel, and community facilities and community well-being.
- 8.7. As written, the draft Strategy covers all four town centres of the district: Hitchin, Letchworth Garden City, Royston and Baldock, with considerations and implications for the surrounding context of each centre. It sets out the Council's vision for the town

- Centres across four generic themes: land use and retail, built environment, transport access and movement and communities.
- 8.8. The Strategy is delivery and development focussed, providing a comprehensive overview and summary of the Council's evidence base for development in and affecting town centres at **Part 1: Town Centres Context.** This section will assist landowners, architects, planners, and stakeholders bringing forward development proposals in understanding the relevant context for North Herts' town centres.
- 8.9. In order to bridge the gap between current and emerging Local Plans and to provide further details and guidance to support compliance with relevant town centre policies in the existing Local Plan, **Part 2: Town Centre Guidance**, sets out a series of Guidance Notes. These Guidance Notes provide supplementary information to inform planning applications for development proposals affecting town centres.
- 8.10. Each of North Herts' town centres have specific strengths and weaknesses, offering their own unique offer and Part 3: Individual Town Centre Strategies, provides a vision statement, summary of key priorities for each centre including development opportunities for larger parcels of land and how these could be taken forward through partnership working.
- 8.11 Part 4: Further Council Actions, identifies opportunities to support the vitality and viability of the town centres and proposes further actions together with several funding and delivery options that the Council could consider in delivering the ambitions set out within the draft Strategy. The effective delivery of the Strategy will require the Council to work closely with several partners and stakeholders. It is proposed to gauge the support of key identified partners and stakeholders through the formal consultation process of the Strategy. This will be important in terms of delivering the identified priorities for each of the town centres and the recommended further actions. This approach will help inform a clearer, action-oriented delivery plan to be included in the final version that can be subject to regular review and update.
- 8.12 The **Appendices** to the draft Strategy comprise:
 - Appendix 1: providing a full reference list and hyperlinks to the comprehensive evidence base at Part 1.
 - Appendix 2: outlines the Town Centre Policy Direction recommending alterations
 to the adopted Local Plan given the significant changes in retail floorspace
 demand, changes in use classes and other policy recommendations identified in
 the 2024 Retail and Town Centre Study. This has informed the guidance
 principles outlines in Part 2 of the draft Strategy, but its recommendations will be
 formally considered and taken forward through the Local Plan review.
 - Appendix 3: includes further background evidence notes for each of the town centres to be read alongside Part 3.
- 8.13 The draft Town Centres Strategy is attached at <u>Appendix A</u> together with the supporting Appendices.

- 8.14 Subject to approval by Cabinet, the draft Town Centres Strategy together with its supporting appendices will be made available for public consultation in early December. It is proposed to have an extended consultation period over December and January given the Christmas period. This programme will also afford wider public engagement with the Area Forums in December during the consultation period, in addition to consulting with key stakeholders in terms of preparing a delivery plan as outlined in paragraph 8.11 above delivering, as well as with local businesses and members of the public registered on the Council's Local Plan data base.
- 8.15 Any comments received will inform the final version of the Strategy which would then be re-presented to Cabinet for approval and adoption at an appropriate time in early 2026. The final version of the Strategy will be desktop published with graphics, photos and designed as a readable and well-presented document.
- 8.16 If / once adopted, the Town Centres Strategy would be a material planning consideration for relevant planning applications and would supersede the Council's previous town centre strategies for Baldock, Hitchin, Letchworth Garden City and Royston prepared between 2004 and 2008.

9. LEGAL IMPLICATIONS

- 9.1. Under the Terms of Reference for Cabinet, paragraph 5.7.18 of the Constitution states that the Cabinet should exercise the Council's functions as Local Planning Authority except to the extent that those functions are by law the responsibility of the Council or delegated to the Director: Place. This includes the preparation and adoption of planning strategies and guidance notes which do not form part of the Council Policy Framework.
- 9.2. The preparation of statutory plans and supporting documents is guided by a range of acts and associated regulations including the Planning and Compulsory Purchase Act 2004 (as amended) and the Localism Act 2011.
- 9.3 Supporting documents and strategies to the Local Plan are often prepared as Supplementary Planning Documents (SPDs). These have a defined meaning and place within the statutory planning system and are subject to various regulatory requirements.
- 9.4 The Town Centres Strategy has and will closely follow the *process* for the preparation of a SPD. However, because it's *content* diverges from the policies of the Local Plan due to the changed circumstances outlined in the report it is not possible to formally adopt it as an SPD. It is intended that, subject to future approval, the Town Centres Strategy would be adopted as a material planning consideration for relevant planning applications.
- 9.4 The weight to be attributed to any policy or policy document or material consideration is a matter for the decision-maker on a case-by-case basis. However, by following the steps outlined above it is considered that a future, adopted strategy could be considered broadly commensurate to a formal SPD and applied as such.

10. FINANCIAL IMPLICATIONS

10.1. No new financial implications arising from this report. The general costs of preparing the draft Town Centres Strategy including consultancy and supplementary staffing costs has

been met through existing revenue budgets (see also Human Resources Implications below). £119k was carried forward into 2025/26, £29k has been spent so far in 2025/26, leaving £90k in the town centres budget.

11. RISK IMPLICATIONS

- 11.1. Good risk management supports and enhances the decision-making process, increasing the likelihood of the Council meeting its objectives and enabling it to respond quickly and effectively to change. When taking decisions, risks and opportunities must be considered.
- 11.2 Town Centres Strategy is listed as a Corporate Risk relating to a key project in the Council Delivery Plan. As part of Council Delivery Plan monitoring arrangements, the risk entry is reviewed and updated on a quarterly basis and reported to Overview & Scrutiny Committee and Cabinet. Without having a Town Centres Strategy in place that provides a strategic direction and overall policy guidance could lead to speculative development that undermines the function of the town centre thereby impacting its vitality and viability.

12. EQUALITIES IMPLICATIONS

- 12.1. In line with the Public Sector Equality Duty, public bodies must, in the exercise of their functions, give due regard to the need to eliminate discrimination, harassment, victimisation, to advance equality of opportunity and foster good relations between those who share a protected characteristic and those who do not.
- 12.2. There are not considered to be any direct equality issues arising from this report. Future individual schemes or considerations may well be subject to appropriate review to ensure they comply with latest equality legislative need. Any risks and opportunities identified will also be subject to assessment for impact on those that share a protected characteristic.

13. SOCIAL VALUE IMPLICATIONS

13.1. The Social Value Act and "go local" requirements do not apply to this report.

14. ENVIRONMENTAL IMPLICATIONS

- 14.1. There are no known direct Environmental impacts or requirements that apply to this report and its recommendations; this is a procedural decision.
- 14.2 The adopted Local Plan policies which implement the guidance and priorities within the draft Town Centres Strategy have been subject to statutory environmental assessment as part of the Local Plan examination. Officers will consider the environmental implications of any developments or improvements within or nearby the town centres when assessing planning applications and when reviewing retail and town centre policies in the updated Local Plan.

15. HUMAN RESOURCE IMPLICATIONS

15.1 There are no new human resource implications arising from the contents of this report, other than officer requirements to progress the public consultation, which is part of their duties.

- 15.2 A Town Centre Project Officer post was established through a revenue budget growth bid a number of years ago with the intention it would lead on delivery of the Town Centres Strategy. This post was never successfully filled on a permanent basis despite multiple rounds of advertisement and recruitment. Resource for the project has been provided through a combination of agency contractors, consultant support, fixed-term appointments to the establishment post and backfilling by other officers.
- 15.3 The Town Centre Project Officer post is currently vacant. However, there is sufficient funding within the town centres budget (see para 10.1 above) and / or arising from salary underspend from this current vacancy should further work be required following the public consultation to complete the Strategy for final adoption by Cabinet.
- 15.4 Future officer resources required to deliver on the projects and priorities in the Town Centres Strategy are currently under consideration by the Service Manager and Director. The outcomes of this will be reflected in the Budget setting cycle for 2026/7 onwards and / or through quarterly budget monitoring reports as appropriate.

16. APPENDICES

16.1 Appendix A: Draft Town Centres Strategy (Sept 2025) and Supporting Appendices

17. CONTACT OFFICERS

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18. BACKGROUND PAPERS

- 18.1 Town Centres and Retail Study (December 2024) prepared by Lichfields
- 18.2 Adopted Local Plan (2011 2031)

- 18.3 Various Strategic Planning Matters Reports updating Cabinet at the following meetings:
 - 16 January 2024
 - 19 March 2024
 - 09 July 2024
 - 14 January 2025
 - 24 June 2025.
 - 23 September 2025
- 18.4 Various MIS Notes published in February 2024 and June 2024, available upon request.