HARLOW RETAIL FRONTAGES STUDY 2019





Working together for Harlow

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1. Introduction

- 1.1 In order to inform the preparation of planning policies, and reflecting the duty placed on the Council as Local Planning Authority to review the socio-economic and environmental conditions of the district, the Council annually assesses the retail frontages in Harlow. This provides analysis of changes that have occurred in the retail frontages.
- 1.2 The frontages of retail units extend interior uses outwards into the surrounding public space through visual contact. The majority of retail frontages are occupied by shops, but some frontages are occupied by other uses, such as banks, launderettes, travel agents, estate agents and tanning salons.

Monitoring of retail frontages

- 1.3 The retail frontages are designated in the extant Adopted Replacement Harlow Local Plan (2006). New frontages will be designated in the new Harlow Local Development Plan and the Harlow Town Centre Area Action Plan, both of which are currently in production.
- 1.4 The monitoring of retail frontages is important to provide a barometer on the vitality, viability and success of Harlow's retail areas. Such monitoring also allows the identification of trends and the measurement of success (or otherwise) of the local planning policies which seek to control the proportions of uses within the retail frontages.

Town centre

- 1.5 Two types of retail frontage are found in the town centre primary retail frontages and secondary retail frontages.
- 1.6 **Primary** retail frontages represent core retail activity, often identifiable by high levels of pedestrian footfall, higher rents and commercial rates, the presence of national retailers, and a high proportion of shops.
- 1.7 **Secondary** retail frontages are often characterised by lower rateable values, and the presence of independent and convenience retailers, and diverse and flexible uses (e.g. offices and restaurants as well as shops).
- 1.8 The new Local Plan will not designate these frontages; instead they will be designated in the separate Harlow Town Centre Area Action Plan which is being prepared. More information about this Plan is available in Chapter 4.

Neighbourhood Centres and Hatches

1.9 The Study also considers the frontages of neighbourhood centres and hatches.

- 1.10 Neighbourhood centres and hatches are small, planned retail areas found in the Harlow district, normally located within/adjacent to residential areas, to serve local residents. They are characterised by lower rateable values, and the presence of independent and convenience retailers and diverse and flexible uses (e.g. launderettes, banks and restaurants as well as shops).
- 1.11 Hatches generally consist of between two and 10 units, with neighbourhood centres containing more.
- 1.12 Note that the emerging new Harlow Local Plan has designated amended neighbourhood centre frontages, but no longer designates hatch frontages (as the policy relevant to hatches does not specifically set out requirements for frontages). However, this Study will continue to analyse frontages of hatch units for completeness and effective monitoring.

Other areas

1.13 The Retail Frontages Study is not an extensive survey of **all** retail and non-retail uses in the Harlow district. There are other areas where units are present but are not identified as being retail frontages. Such areas include the retail parks in the north of the district.

2. National Legislation

Use Classes Order

- 2.1 Uses of land and buildings are categorised into various uses known as 'use classes' which are defined by The Town and Country Planning (Use Classes) Order 1987 (as amended). The use classes most frequently found in retail areas are:
 - A1 Shops includes units for:
 - retail sale of goods (to visiting members of the public) other than hot food
 - post offices
 - ticket sales
 - travel agencies
 - sandwiches or other cold food for consumption off the premises
 - hairdressing
 - direction of funerals
 - hiring of domestic/personal goods/articles
 - washing or cleaning of clothes (or associated reception)
 - internet cafe
 - A2 Financial and professional services includes units for:
 - financial services
 - professional services (other than health/medical services)
 - A3 Restaurants and cafes includes units for:
 - sale of food and drink for consumption on the premises
 - A4 Drinking establishments includes units for:
 - use as a public house, wine-bar or other drinking establishment
 - A5 Hot food takeaways includes units for:
 - sale of hot food for consumption off the premises
 - Sui Generis certain uses which do not fall within any use class includes units for:
 - use as a theatre, amusement arcade/centre, funfair, launderette, taxi business, hire of motor vehicles, hostel, night-club, casino, betting office or pay day loan shop
 - sale of fuel for motor vehicles
 - sale/display for sale of motor vehicles
 - bookmakers
 - payday loan shops

2.2 The Town and Country Planning Act 1990 (as amended) states that a change of use is not development which requires planning permission, so long as the new use and the former use are both within the same use class. Other changes of use require planning permission, except for those which benefit from permitted development rights.

Permitted development rights

- 2.3 A number of changes of use can take place, without the need for planning permission, under permitted development rights enacted by The Town and Country Planning (General Permitted Development) Order 1995 (as amended).
- 2.4 There have been a number of amendments to the Order in recent years the most notable relating to retail uses introduced permitted development rights which allow flexible, temporary changes of use.

3. National Policies

National Planning Policy Framework (NPPF)

- 3.1 The NPPF was introduced in 2012 and replaced most existing national planning guidance. In 2018, the NPPF was revised and a new edition published.
- 3.2 The new NPPF requires Local Plans to define a network and hierarchy of town centres and promote their long-term vitality and viability, by allowing them to grow and diversify in a way that responds to rapid changes.
- 3.3 Similarly to the previous NPPF, the new version requires Local Plans to retain and enhance existing markets; to allocate a range of suitable town centre sites to meet the development needed; and to allocate suitable edge-of-centre sites where appropriate.
- 3.4 The requirement of the previous NPPF to identify primary and secondary frontages has been removed. Instead, Local Plans are now required to define the extent of town centres and primary shopping areas, making clear the range of uses permitted in such locations, as part of a positive strategy for the future of each retail centre.
- 3.5 A sequential test continues to be required in Local Plans, which must be applied to planning applications for main town centre uses which are not in an existing centre or in accordance with an up-to-date Local Plan. The order of the sequential test must be that main town centre uses are located in town centres, then in edge of centre locations, and only if suitable sites are not available should out of centre sites be considered.
- 3.6 The NPPF also sets out requirements for parking standards, including improving the quality of parking and promoting accessibility for pedestrians and cyclists.

National Planning Policy Guidance (NPPG)

- 3.7 The NPPG was introduced in 2014 and acts as supporting guidance to the NPPF.
- 3.8 It reiterates the NPPF policy regarding the vitality of town centres, but also adds that town centres should generate local employment; promote beneficial competition within and between town centres; and create attractive.
- 3.9 The NPPF requires Councils to consider the rates of development in town centres compared to out-of-centre; requires town centre strategies to be based on evidence of the current state of town centres, with consideration for the future of the town centre; and states that Councils should consider market signals and the health of a town centre when planning its future.

4. Local Policies

Adopted Replacement Harlow Local Plan (2006)

- 4.1 The town centre frontages are designated on the Proposals Map of the Adopted Replacement Harlow Local Plan (ARHLP). Frontages of neighbourhood centres, and hatches with five or more units, are designated on maps in supporting documents to the ARHLP.
- 4.2 There are a number of policies in the ARHLP relating to retail frontages in Harlow.

Policy RTCS10

- 4.3 Within town centre **primary retail frontages**, changes of use from Class A1 to A2 or A3 may be permitted, provided that:
 - no more than 15% of the frontage length is occupied by non-retail uses;
 - the maximum number of adjoining A3 uses is 2;

• no more than 2 units out of any 5 are non-retail uses.

Such changes of use also have to be appropriate to the town centre; must not be detrimental to the vitality and viability of the town centre; must not affect the retail function and character of the frontage or street scene; and must not result in the loss of key facilities which contribute to the range on offer or assist in the retention or attraction of operators.

Policy RTCS11

- 4.4 Within town centre **secondary retail** frontages, changes of use to Classes A1, A2, A3, D1, D2 or Sui Generis may be permitted, provided that the change:
 - does not result in the loss of key facilities which contribute to the range on offer or assist in the retention or attraction of operators
 - does not have detrimental visual impacts; and does not cause unacceptable noise and disturbance levels.

Policy RTCS12

4.5 Once the Town Centre South development (now known as The Water Gardens Shopping Centre) commenced trading, it would be subject to the primary retail frontage policy.

Policy RTCS15

- 4.6 Within **neighbourhood centres** and **hatches**, the use classes A1, A2, D1, D2 or Launderette (Sui Generis) may be permitted, provided that:
 - neighbourhoods and hatches with 5 or more original units retain a minimum of 40% of frontage length in Class A1 use
 - hatches with 4 or less original units (and Church Langley neighbourhood centre, excluding Tesco)) retain a minimum of 2 units in Class A1 use

• the proposal would not result in the loss of key facilities that contribute to the range on offer, or that act as anchors/catalysts which assist in retaining existing and/or attracting new operators.

New Harlow Local Development Plan

- 4.6 The new Harlow Local Development Plan is currently in preparation and a Pre-Submission Publication version was consulted on in mid-2018, prior to being submitted to Government in October 2018. Examination of the Local Plan will take place in Spring 2019 and adoption is expected to take place later in 2019.
- 4.7 Until the adoption of the new Local Plan, the Adopted Replacement Harlow Local Plan (2006) remains the extant Local Plan for the district, although the new Local Plan now has a certain amount of weight in decision-making.
- 4.8 The Pre-Submission Publication version of the Local Plan contains the following policies relating to retail frontages:

Policy PR6

4.9 Development in the **Town Centre primary frontages** will only be supported where:

(a) the development is for A1 class use;

(b) the development is for use classes A2 or A3 and meets all the following criteria:

(i) 60% or more of the overall primary frontage length is retained for A1 uses; and

(ii) the site has been vacant and actively marketed to the satisfaction of the Council for at least twelve months.

Main Town Centre Uses (with the exception of office uses), evening and night-time uses will be supported in the **Town Centre secondary frontages**.

- 4.10 The implementation of the policy states that within secondary frontages, main Town Centre uses will be considered acceptable except for office development which is considered appropriate only on first floor levels and above.
- 4.11 The Glossary of the emerging new Local Plan states that Main Town Centre Uses are: Retail development; leisure and entertainment facilities; more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

4.12 The Town Centre primary and secondary frontages are to be designated in the separate Town Centre Area Action Plan (see below).

Policy PR8

4.13 Development in **Neighbourhood Centre frontages**, which falls in use classes A1, A2, A3, A4, A5, D1, D2, Sui Generis and C3, will be supported where it meets all the following criteria:

(a) the development would not result in the loss of key facilities that act as anchors or catalysts which assist in retaining existing or attracting new operators in the Neighbourhood Centre such as supermarkets or public houses;

(b) 60% or more of the overall frontage length would be retained in A1 use; and

(c) for C3 uses, the development is on the first floor or above.

Policy PR9

4.14 Development in **Hatches** will be supported where it meets both the following criteria:

(a) development at ground floor level falls within use classes A1, A2, A3, A4, A5, D1 or D2 or a mix of these uses and does not result in the loss of all convenience facilities, public houses and community facilities; and

(b) development on the first floor or above falls within use classes B1(a) or C3.

4.15 As the emerging new Local Plan does not set requirements for the frontage lengths of hatch units, no hatch frontages are designated. This has minor implications for this Study which are discussed in later chapters.

Harlow Town Centre Area Action Plan

- 4.16 The Policies Map for the emerging new Local Plan does not show any designations for the town centre. These will be designated in a separate Plan, the Harlow Town Centre Area Action Plan (TCAAP).
- 4.17 The TCAAP will set out specific planning policies and proposals, strengthening the vitality and viability of the town centre whilst presenting an opportunity to create the conditions for a resilient and successful centre.
- 4.18 It will also provide a spatial planning framework, including specific policies and proposals that will guide and support future development and regeneration in the town centre based on the overarching strategic polices set out in the new Local Plan.
- 4.19 The TCAAP will also designate new town centre retail frontages.

5. Retail Frontages Study Methodology

- 5.1 The first Retail Frontages Study was undertaken prior to 2001 (exact date unknown) and was updated in 2002, 2003 and 2009. Since 2013, the Study has been updated annually at the start of each year. The next Study update is due at the start of 2020.
- 5.2 An extraordinary biannual update was carried out in July 2017 for the town centre frontages, to assist the commencement of work on the Town Centre Area Action Plan.
- 5.3 Prior to the 2013 update, hatches with fewer than five units were not assessed in the Retail Frontages Study as they do not have retail frontages which are designated in the Adopted Replacement Harlow Local Plan (2006). Since 2013, **all** hatches have been assessed, to ensure completeness and effective monitoring.
- 5.4 There are also a number of other areas, such as units in the town centre which are not currently designated as frontage but could benefit from such a designation, which have been recorded. More information on such areas is contained in Chapter 11.
- 5.5 Note that the emerging new Harlow Local Development Plan no longer designates hatch frontages (as the policy does not specifically refer to frontages). However, this Study will continue to analyse the frontages of hatches, even though they will no longer be designated, for completeness and effectiveness of monitoring.

6. Findings: Introduction

- 6.1 The lengths and proportions of use classes of the retail frontages have been recorded and analysed. Site visits, recording and analysis take place at the start of each year¹.
- 6.2 The *lengths of frontage*, rather than *number of units*, have been analysed. Frontage lengths are a more useful indicator than number of units, as one large unit in a single use could occupy a large frontage, whereas several small units in various uses could occupy a small frontage.
- 6.3 The analysis considers frontages which are designated in the Adopted Replacement Harlow Local Plan (2006) (ARHLP). The Water Gardens shopping area is not specifically designated, but it is included as the ARHLP states that it should be considered as primary frontage once it commenced trading.

¹ The exact date of the pre-2001 surveys is unknown, but is likely to have been Summer 2000. The July 2017 town centre survey was an additional mid-year assessment to assist the early stages of the Harlow Town Centre Area Action Plan preparation.

7. Findings: Town Centre Primary Frontages

7.1 Table 7.a, below, summarises the proportions of designated **town centre primary frontages** in each use class up to 2019.

Note: The data in the tables below is based on frontage designations in the extant Adopted Replacement Harlow Local Plan (2006).

	Pre- '01*	'02 *	<i>'</i> 03	<i>'09</i>	ʻ13	'14	'15	'16	'17	Jul '17	<i>'18</i>	'19
	%	%	%	%	%	%	%	%	%	%	%	%
A1	83.4	83.0	77.6	71.1	74.2	74.5	71.4	64.6	60.2	59.5	65.7	58.7
A2	3.4	3.7	3.7	3.1	4.2	4.0	4.1	3.6	4.3	4.3	4.9	4.9
A3	1.8	1.8	1.6	3.6	3.9	4.4	4.9	5.5	7.0	6.8	9.0	9.0
A3/A5	3.3	3.3	2.9	2.9	2.1	2.1	2.1	2.1	2.1	2.1	2.1	2.1
A4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
A5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SG	0.0	0.0	0.3	0.3	1.0	1.0	0.5	0.8	0.7	0.7	1.0	1.0
Other	1.9	1.9	1.7	2.3	2.0	2.0	1.1	1.1	1.3	1.3	1.3	1.3
B1	0.2	0.2	0.2	0.2	0.1	0.1	0.1	0.1	0.1	0.3	0.3	0.3
D1/D2	6.0	6.0	5.4	5.3	3.9	3.9	4.1	4.1	5.2	5.2	5.2	5.2
Vacant	0.0	0.0	6.6	11.2	8.5	8.0	2.8	7.9	9.9	10.5	4.5	11.5
VA1	0.0	0.0	2.1	6.4	5.4	5.5	2.3	7.1	8.8	9.4	2.9	10.2
VA2	0.0	0.0	0.0	0.9	0.7	0.5	0.5	0.5	0.5	0.5	0.5	0.2
VA3	0.0	0.0	0.0	0.0	0.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0
VU	0.0	0.0	4.4	3.9	2.0	2.0	0.0	0.0	0.0	0.0	0.0	0.0
VSG	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.3	0.6	0.6	0.3	0.3
VN/A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.8	0.8
Redev't.	0.0	0.0	0.0	0.0	0.0	0.0	10.4	10.1	9.0	9.3	6.1	6.1

Table 7.a: Town centre primary frontage use classes, pre-2001 – 2019*

*Approx. 20% of the town centre primary frontages were not recorded in 2001 & 2002, so data for these years is of limited use.

- 7.2 The frontages of the Water Gardens shopping area, which opened in 2004 and were not mapped in the Adopted Replacement Harlow Local Plan, were surveyed in 2013 and found to form a total length of 532m.
- 7.3 Table 7.b summarises the changes experienced in the town centre primary frontages between 2003 and 2019, in order of significance.

2003 to 2009	2009 to 2013	2013 to 2019
A1 – 6.5%	A1 + 3.1%	A1 – 15.5%
A3 + 2%	D1/2 – 1.4%	A3 + 5.1%
Oth + 0.6%	A2 + 1.1%	D1/2 + 1.3%
A2 - 0.6%	A3/5 – 0.8%	A2 + 0.7%
D1/2 - 0.1%	SG + 0.7%	Oth – 0.7%
	A3 + 0.3%	B1 + 0.2%
	Oth – 0.3%	
	B1 – 0.1%	
VACANT + 4.6% (from 6.6%)	VACANT – 2.7% (to 8.5%)	VACANT + 3% (from 8.5%)
		REDEV'T. + 6.1% (from 0%)

Table 7.b: Summary of changes to town	centre primary frontages, 2003 – 2019

- 7.4 The increase in vacant frontages between 2003 and 2009 reflected the nationwide impact of the global recession on the retail industry. Between 2009 and 2013, it is evident that a slow recovery from the recession had begun, with the amount of vacant frontage reducing.
- 7.5 There has been a notable drop in A1 frontage between 2013 and 2019. This is mostly due to the closure of Little Walk for redevelopment and the closure of the large BHS unit² in the Harvey Centre.
- 7.6 Since 2015, a number of units have closed for redevelopment, such as Little Walk. This redevelopment is a signal of investment and regeneration in the town centre, and further recovery from the global recession experienced in the previous decade. The frontages of these units have been recorded as 'undergoing redevelopment', rather than being vacant, to more accurately record their status.
- 7.7 At the start of 2015, the proportion of vacant frontage fell to 3%, the lowest level for over a decade, partly because of the high amount of previously vacant frontage which had started to be redeveloped.
- 7.8 The large Marks & Spencer store in Broad Walk closed by the start of 2016, meaning the amount of vacant frontage increased to 8%. Most of this store was, however, in use again by the start of 2017 following reconfiguration and redevelopment of the unit.
- 7.9 In Summer 2016, the large BHS unit in the Harvey Centre closed. This had an impact on the proportion of vacant frontage at the start of 2017, but the reopening of other vacant units negated the closure of BHS to an extent.

² Frontage length of 149m.

- 7.10 New units resulting from the redevelopment of the first floor of the Harvey Centre started to be occupied at the end of 2016, which included the opening of a new cinema. Restaurants have now occupied most of the new units, causing an increase in A3 frontage in recent years.
- 7.11 At the start of 2018, the BHS unit was in A1 use again, but this was temporary and it was vacant again by the start of 2019. The impact of the vacancy of this large unit is clear excluding it from the data means the amount of vacant frontage recorded in 2019, for example, would be 6% rather than 11.5%.
- 7.12 Whilst some previously vacant frontage became in use again between the start of 2018 and 2019, other units became vacant, including the Harvey Centre units previously occupied by Argos and Blue Inc., which have long frontages.
- 7.13 Along with the BHS unit becoming vacant again, the proportion of vacant frontage at the start of 2019 rose, and the proportion of A1 frontage dropped, to levels not experienced for over 15 years. The proportion of A1 use is expected to increase, however, once the town centre units undergoing redevelopment are reoccupied.
- 7.14 The closure of stores such as BHS, Argos, Blue Inc. and Poundworld in Harlow reflects national trends where these retailers have closed all (or a proportion) of stores across the UK. In the case of Argos, a number of stores have closed in favour of reopening as part of a larger shop such as Sainsbury's.
- 7.15 New permitted developments were introduced in recent years which allow greater flexibility of changes-of-use for retail units. These new permitted development rights appear to have had little impact on the town centre primary frontages. A1 use has, therefore, remained the most prominent.
- 7.16 Chapter 11 of this Study contains information on frontages which are not currently designated but could benefit from a designation, and vice versa. These are being considered in the preparation of the Harlow Town Centre Area Action Plan.
- 7.17 The emerging new Harlow Local Plan does not designate retail frontages in the town centre these will be designated in the separate Area Action Plan.
- 7.18 The graphs on the following pages show the proportions of use class in each of the recorded years from 2003 to 2019. Maps of the town centre displaying the data by year and unit are available in the Appendices. The graphs and maps reflect the frontages as designated in the extant Adopted Replacement Harlow Local Plan (2006).

























8. Findings: Town Centre Secondary Frontages

8.1 Table 8.a, below, details the proportions of designated **town centre secondary frontages** in each use class up to 2019.

Note: The data in the tables below is based on frontage designations in the extant Adopted Replacement Harlow Local Plan (2006).

	'03 *	'13	'14	'15	'16	'17	Jul '17	'18	'19
	%	%	%	%	%	%	%	%	%
A1	38.4	26.3	29.2	26.8	29.5	30.2	27.9	27.9	24.7
A2	37.1	19.2	18.7	18.0	12.0	12.7	12.7	11.8	11.8
A3	10.4	10.7	10.4	11.3	9.6	11.3	11.3	11.3	9.6
A3/A5	2.0	2.7	2.7	2.5	2.9	2.0	2.0	2.0	3.3
A4	1.1	1.9	1.9	1.9	1.9	1.9	1.9	1.9	1.9
A5	2.0	2.7	2.7	2.9	2.6	2.6	2.6	2.6	2.6
SG	0.0	7.6	7.9	7.4	14.1	14.1	13.7	13.6	12.8
Oth	5.3	3.7	3.7	3.6	3.6	3.6	3.6	3.6	3.6
B1	1.1	0.5	1.4	3.3	3.3	3.3	2.9	2.9	2.9
D1/D2	2.3	1.3	1.3	0.9	0.4	0.9	0.9	0.9	0.9
C3	0.3	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2
Vacant	0.0	23.2	19.9	21.2	20.0	17.4	20.5	11.3	15.7
VA1	0.0	3.2	2.8	4.8	4.6	3.5	6.3	5.0	10.4
VA2	0.0	14.0	13.0	13.1	12.2	12.2	12.2	4.7	2.5
VA3	0.0	0.0	0.4	0.0	0.0	0.0	0.0	0.0	0.4
VA5	0.0	0.0	0.0	0.4	0.4	0.4	0.4	0.4	0.4
VD1	0.0	2.5	1.2	1.1	1.6	0.0	0.0	0.0	0.0
VD2	0.0	1.2	1.2	1.2	1.2	1.2	1.2	1.2	1.2
VSG	0.0	1.4	1.4	0.6	0.0	0.0	0.0	0.0	0.8
VU	0.0	0.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0
VOth	0.0	0.0	0.0	0.0	0.0	0.0	0.4	0.0	0.0
Redev't.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	10.2	10.2

Table 8.a: Town centre secondary frontage use classes, 2003 – 2019

*Approx. 25% of the town centre secondary frontages were not recorded in 2003, so data for this year is of limited use. None of the frontages were recorded in 2001, 2002 and 2009.

8.2 Table 8.b, overleaf, summarises the changes experienced in the town centre secondary frontages between 2003 and 2019, in order of significance.

Table 8.b: Summary of changes to town centre secondary frontages, 2003 –	
2019	

2003 t	o 2013	2013 t	o 2019	
A2	- 17.9%	A2	- 7.4%*	
A1	- 12.1%	SG	+ 5.2%*	
SG	+ 7.6% (from 0%)	B1	+ 2.4%	
Oth	- 1.6%	A1	- 1.6%	
D1/2	- 1.0%	A3/5	+ 0.6%	
A4	+ 0.8%	A3	- 1.1%	
A3/5	+ 0.7%	D1/2	- 0.4%	
A5	+ 0.7%	Oth	- 0.1%	
B1	- 0.6%	A5	- 0.1%	
A3	+ 0.3%		of the A2 to SG change is due	
C3	- 0.1%		ion change, which from 2015 akers being categorised as SC	
VACA	NT + 23.2%** (from 0%)	VACA	NT – 7.5% (to 15.9%)	
			V'T + 10.2% (from 0%)	

**As 25% of the frontages were not recorded in 2003, there is a likelihood that the vacant frontages were higher than 0% in reality, so the 2003 data may not be a true representation of the frontages at that point. Nonetheless, there was a definite increase in vacant frontages, most likely attributable to the global recession.

- 8.3 New permitted developments were introduced in 2013 which allow greater flexibility of changes-of-use for retail units. These new permitted development rights appear to have had little impact on the frontages because the proportions of uses have remained relatively stable, with A1 use remaining the most prominent.
- 8.4 Considering that much of the change from A2 to Sui Generis between 2013 and 2019 was due to the national reclassifying of bookmakers in 2015, there was little actual change experienced between use classes during this period.
- 8.5 The most significant change since 2013 is the decrease in vacant frontage, due to units coming back into use and also some starting to undergo redevelopment. The main example of this is the large frontage of the combined units of West Gate, which were previously mostly vacant, now undergoing redevelopment.
- 8.6 There was, however, an increase of vacant frontage between the start of 2018 and 2019, with the proportion rising by just over 4%. Some units previously vacant at the start of 2018 came back into use, but this was negated by the closure of the large units previously occupied by a Polish supermarket in West Gate and the BHF charity shop on the corner of Terminus Street.

- 8.7 Chapter 11 of this Study contains information on frontages in the town centre which are not currently designated but could benefit from a designation, and vice versa. These are being considered in the preparation of the Harlow Town Centre Area Action Plan.
- 8.8 The emerging new Harlow Local Plan does not designate retail frontages in the town centre these will be designated in the separate Area Action Plan.
- 8.9 The graphs on the following pages show the proportions of use class in each of the recorded years from 2003 to 2019. Maps of the town centre displaying the data by year and unit are available in the Appendices. The graphs and maps reflect the frontages as designated in the extant Adopted Replacement Harlow Local Plan (2006).



Note: The data in the graphs below is based on frontage designations in the extant Adopted Replacement Harlow Local Plan (2006).













9. Findings: Neighbourhood Centre Frontages

9.1 Table 9.a, below, summarises the proportions of designated **neighbourhood centre frontages** in each use class up to 2019.

Note: The data in the tables below is based on <u>existing</u> frontage designations in the extant Adopted Replacement Harlow Local Plan (2006).

	Pre- '01	'02	<i>'</i> 03	<i>'09</i>	'13	'15	'16	'17	'18	'19
	%	%	%	%	%	%	%	%	%	%
A1	65.1	61.4	61.4	56.5	58.5	58.4	60.9	62.6	61.5	61.5
A2	11.2	11.2	10.6	12.2	12.7	9.4	5.2	4.6	4.2	4.2
A3	9.3	13.0	10.2	10.7	10.2	11.6	11.1	10.5	10.3	10.9
A3/A5	1.2	1.2	1.2	1.7	3.5	1.7	1.7	2.9	3.0	2.4
A4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
A5	1.2	1.2	1.1	1.7	1.1	2.9	3.4	2.2	3.3	3.4
SG	1.2	1.2	1.7	2.3	2.8	2.8	5.8	5.8	6.5	6.5
Other	6.4	6.4	6.1	6.1	6.1	6.1	6.1	6.1	6.1	6.1
B1	2.9	2.9	2.3	2.3	0.3	0.8	0.3	0.3	1.4	1.4
D1	1.3	1.3	1.2	1.9	1.9	2.4	2.4	2.4	2.4	2.4
C3	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2
Vacant	0.0	0.0	4.0	4.5	2.8	2.2	2.9	2.3	1.0	0.9
VA1	0.0	0.0	1.6	4.5	1.7	1.7	1.1	0.6	0.6	0.6
VA2	0.0	0.0	1.1	0.0	0.6	0.6	1.7	1.2	0.4	0.4
VA5	0.0	0.0	0.0	0.0	0.6	0.0	0.0	0.0	0.0	0.0
VU	0.0	0.0	1.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0
VA3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.6	0.0	0.0
Redev't	0.0	0.0	0.0	0.0	0.0	1.4	0.0	0.0	0.0	0.0

Table 9.a: Neighbourhood centre frontage use classes, pre-2001 – 2019

9.2 Table 9.b, overleaf, summarises the changes experienced in the neighbourhood centre frontages between 2003 and 2019, in order of significance.

2003 to 2009	2009 to 2013	2013 to 2019
A1 – 4.9%	A1 + 2%	A2 – 8.5%*
A2 + 1.6%	B1 – 2%	SG + 3.7%*
D1 + 0.7%	A3/5 + 1.8%	A1 + 3%
A5 + 0.6%	A5 – 0.6%	A5 + 2.3%
SG + 0.6%	A2 + 0.5%	B1 + 1.1%
A3 + 0.5%	A3 – 0.5%	A3/5 – 1.1%
A3/5 + 0.5%	SG + 0.5%	D1 + 0.5%
		A3 + 0.7%
		*Much of the A2 to SG change is due to a planning legislation change, which from 2015 resulted in bookmakers being categorised as SG rather than A2
VACANT + 0.5%	VACANT ↓ 1.7%	VACANT ↓ 1.9%

Table 9.b: Summar	v of changes to	neighbourhood	centre frontages	2003 - 2019
Table J.D. Sullina	y ui unanyes iu	neignbournoou	centre nontages	, 2003 – 2019

- 9.3 The neighbourhood centres have consistently performed well, even during the period of the recession in the late 2000s, maintaining very low amounts of vacant frontage. In recent years there has been little change, with only a small change in A3 and A3/5 frontage being the most notable difference between the start of 2018 and 2019.
- 9.4 The predominant frontage use has consistently been A1, although there are significant frontage lengths in A2 and A3 use, as well as lower amounts of frontage in other uses. This is in accordance with the Adopted Replacement Harlow Local Plan (2006) policy, which seeks a diverse range of uses in neighbourhood centres and restricts increase of A3 frontage.
- 9.5 New permitted developments were introduced in 2013 which allow greater flexibility of changes-of-use for retail units (see Chapter 2 for more information). These new permitted development rights appear to have had little impact on the neighbourhood centre frontages.
- 9.6 The graphs on the following pages show the proportions of use class in each of the recorded years from 2003 to 2019. The graphs show data based on the **existing** frontages. Maps of the neighbourhood centres displaying the most recent data by unit are available in the Appendices. These maps display the **amended** frontages as designated in the emerging new Local Plan.















Fig. 9.7





10. Findings: Hatch Frontages

10.1 Table 10.a, below, summarises the main changes experienced in the designated hatch frontages up to 2019.

Note: The data in the tables below is based on <u>existing</u> frontage designations in the extant Adopted Replacement Harlow Local Plan (2006).

	Pre- '01	'02	<i>'</i> 03	<i>'09</i>	'13	<i>'15</i>	'16	'17	'18	'19
	%	%	%	%	%	%	%	%	%	%
A1	61.2	61.2	61.2	52.9	52.9	52.9	52.9	48.1	48.3	51.4
A2	10.8	10.8	10.8	8.6	8.6	8.6	0.0	0.0	0.0	0.0
A3	10.3	10.3	10.3	15.7	15.7	15.7	15.7	15.7	15.7	17.3
A3/A5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	3.3	0.0	0.0
A4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
A5	14.7	14.7	14.7	14.7	14.7	14.7	14.7	14.7	14.8	14.7
SG	0.0	0.0	0.0	0.0	1.7	1.7	10.3	11.8	11.8	11.8
Other	1.5	1.5	1.5	1.5	1.5	1.5	1.5	1.5	1.5	1.5
D1	1.5	1.5	1.5	3.2	3.2	3.2	3.2	3.2	1.4	0.0
B1	0.0	0.0	0.0	0.0	1.7	1.7	1.7	1.7	1.8	1.7
Vacant	0.0	0.0	0.0	3.4	0.0	0.0	0.0	0.0	3.3	0.0
VA1	0.0	0.0	0.0	1.7	0.0	0.0	0.0	0.0	0.0	0.0
VB1	0.0	0.0	0.0	1.7	0.0	0.0	0.0	0.0	0.0	0.0
VA3/5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	3.3	0.0
Redev't	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.5	1.5

Table 10.a: Hatch frontage use classes, 2001 – 2019

10.2 Table 10.b, below, summarises the changes experienced in the neighbourhood centre frontages between 2003 and 2019, in order of significance.

2003 to 2009	2009 to 2013	2013 to 2019
A1 – 8.3%	B1 + 1.7% (from 0%)	SG + 10.1%
A3 + 5.4%	SG + 1.7% (from 0%)	A2 – 8.6% (to 0%)
A2 – 2.2%		A3 + 1.6%
D1 + 1.7%		A1 – 1.5%
		D1 – 3.2% (to 0%)
		*Much of the A2 to SG change is due to a planning legislation change, which from 2015 resulted in bookmakers being categorised as SG rather than A2
VACANT + 3.4% (from 0%)	VACANT + 3.4% (to 0%)	VACANT 0%
		REDEV'T. + 1.5% (from 0%)

Table 10.b: Summary of main changes to hatch frontages, 2003 – 2019

- 10.3 Between 2003 and 2009, there was a notable decrease in the A1 usage, as well as a decrease in the A2 usage. The only usage which increased was A3.
- 10.4 Between 2009 and 2013, the vacant frontages were brought back into use as B1 and Sui Generis uses, resulting in no vacant frontage. Since 2013, there has been a notable increase in Sui Generis uses, with a small increase in A3/5. These were offset by decreases in A1 and A2 uses.
- 10.5 The hatches have consistently performed well, with only one year prior to 2018 having any recorded vacant frontage (3.4% in 2009). In 2018, 3.3% of vacant frontage was recorded due to a unit becoming vacant at Cawley Hatch. This unit was, however, back in use again by the start of 2019 and there was no vacant frontage recorded in the hatches.
- 10.6 The proportions of frontages have remained constant; around half being in A1 use, with significant amounts of A2, A3 and A5 uses. This is in accordance with the Adopted Replacement Harlow Local Plan (2006) policy, which seeks a diverse range of uses in hatches, but also seeks to ensure no further provision of A3 uses.
- 10.7 New permitted developments were introduced in 2013 which allow greater flexibility of changes-of-use for retail units (see Chapter 2 for more information). These new permitted development rights appear to have had little impact on the hatch frontages.
- 10.8 Chapter 11 of this Study contains information on frontages in the hatches which are not currently designated but could benefit from a designation, and vice versa. These were considered in the preparation of the emerging new Harlow Local Plan. It was decided that, to ensure the most appropriate and effective delivery of the policy relating to hatches, the hatches would no longer have designated frontages. Instead, the policy refers to hatches as a whole rather than their frontages.
- 10.9 Whilst the emerging new Local Plan does not designate frontages for the hatches, this Study will continue to analyse data for all hatches in the graphs and tables, and provide maps (in the Appendices) analysing the most recent data.
- 10.10 The graphs on the following pages show the proportions of use class in each of the recorded years from 2003 to 2019.
















11. Town centre frontages requiring further review

- 11.1 In the town centre, primary and secondary retail frontages protect and enhance existing retail offer by preventing an unacceptably high proportion of uses which are not conducive to town centre retail. Such frontages also allow opportunities for future growth opportunities and encourage the introduction or re-introduction of retail uses in areas which lack such use.
- 11.2 In 2017, several lengths of retail frontage in Harlow town centre were identified which are not in predominantly retail use (e.g. the Central Library) or are 'dead' in appearance (e.g. the side of a shop which has bricked-in spaces for windows and has activity levels).
- 11.3 The removal of a length of frontage could have negative consequences. For example, if a store has two sides of primary frontage but one of the sides is 'dead' and is removed as primary frontage, the store could be sub-divided to allow a new use on the 'dead' side, and the local planning authority would have less power to control what this use is due to the 'dead' side no longer having primary frontage designation. It could also discourage retailers occupying units if part (or all) of a unit lacks a frontage designation. Not every 'dead' length of frontage has been reviewed; for example small alley spaces and fire exits were not considered suitable for reviewing.
- 11.4 There are occasions when designating a new length of shops as frontage is beneficial, for example when encouraging an area to increase its retail usage, or where it has been identified that there needs to be greater control of a length of shops to preserve its uses.
- 11.5 Table 11.1 below details lengths of units which were identified as requiring further review, with recommendations and associated justifications given for each. Recommendations include removing a frontage designation from a length of units, or designating a length of units as frontage which are not currently designated as such.
- 11.6 During the preparation of the new Harlow Local Plan, decisions were made as to which of the recommendations should be implemented. This resulted in the frontages of the Church Langley neighbourhood centre and extra frontages of Staple Tye neighbourhood centre being designated as neighbourhood centre frontages in the emerging new Plan. Recommendations which would have required the redrawing of the neighbourhood centre boundaries could not be justified and so were not implemented.
- 11.7 The policy regarding hatches in the new Plan does not refer to hatch frontages and instead refers to each hatch in its entirety; therefore no hatch frontages are designated in the new Plan. Despite this, the Retail Frontages Study will continue to analyse hatch frontages for monitoring purposes.

- 11.8 None of the recommendations regarding the town centre frontages can be implemented at this stage, as rather than being designated in the new Local Plan, they will be designated in the separate Harlow Town Centre Area Action Plan (TCAAP).
- 11.9 The Issues and Options consultation of the TCAAP took place in mid-2018, and further consultations will take place before it is submitted to government, examined and eventually adopted.

Frontage type	Location (see relevant map)	Description	Potential (identified 2017)	Update – early 2019
Primary	Western & southern side of Unit 24, Harvey Centre	Blank wall of side/rear of large A1 unit, with store signs. Western side is pedestrian entrance to Centre; southern side forms part of frontage with Library	Retain, to allow opportunity for creating more active frontage	The ongoing preparation of the Harlow Town Centre Area Action Plan (HTCAAP) will consider this.
Primary	Central Library frontage	Active frontage of the Library, but this is not a retail use	Retain, to allow opportunity for partial or whole change of frontage to retail use. (Note: there are currently no plans for this to happen.)	The ongoing preparation of the HTCAAP will consider this.
Primary	Western frontage of 39 Redstone House	Blank wall of side of large A1 unit, with store signs	Retain, to allow opportunity for creating more active frontage.	The ongoing preparation of the HTCAAP will consider this.
Primary	Entrance to Redstone House	Entrance lobby to office block (currently in process of conversion to contain residential use)	Remove - no opportunity for bringing into an active frontage as it is a small entrance lobby	The ongoing preparation of the HTCAAP will consider this.
Secondary	Northern frontage of 37 Redstone House	Blank wall of side of large A1 unit, with store signs	Retain, to allow opportunity for creating more active frontage	The ongoing preparation of the HTCAAP will consider this.
Secondary	Mitre House, West Square	Active frontage of office block/entrance, but this is not a retail use	Remove - no opportunity for bringing into retail use as it is part of a larger office block	The ongoing preparation of the HTCAAP will consider this.

Table 11.1: Frontages requiring further review

Frontage type	Location (see relevant map)	Description	Potential (identified 2017)	Update – early 2019
Frontage not mapped	Eastern end of northern frontage of 37 Redstone House	Entrance to large A1 unit	Designate as secondary frontage, to continue existing secondary frontage eastwards to include this entrance, and allow more effective management of the frontage	The ongoing preparation of the HTCAAP will consider this.
Frontage not mapped	Post Office (and alley space) to east of Market House	Active frontage of the Post Office	Designate as secondary frontage, to continue existing secondary frontage eastwards to include this entrance, and allow more effective management of the frontage	The ongoing preparation of the HTCAAP will consider this.
Frontage not mapped and unit not included in Neighbourhood Centre designation on ARHLP Proposals Map	Western, northern & eastern frontage of 73 Bush Fair (Sherwood House)	Active frontage of A2 unit	Change Neighbourhood Centre area to include unit and designate unit frontage as neighbourhood centre frontage, to allow more effective management of the frontage	Not designated in the emerging new Harlow Local Plan, due to lack of justification to change Neighbourhood Centre area.

Frontage type	Location (see relevant map)	Description	Potential (identified 2017)	Update – early 2019
Frontages not mapped, but units included in Neighbourhood Centre designation on ARHLP Proposals Map	Western & southern frontages of pharmacy & surgery/dentist and southern, western & northern frontages of Tesco and Units 1 – 4, Church Langley Neighbourhood Centre	Active frontages of units in a variety of uses	Designate as neighbourhood centre frontage for consistency and to allow more effective management of the frontage	Designated as neighbourhood centre frontage in the emerging new Harlow Local Plan.
Frontages not mapped, but units included in Neighbourhood Centre designation on ARHLP Proposals Map	Western frontage of McDonald's and northern frontage of Unit 19, Staple Tye Neighbourhood Centre	Active frontage of A1 unit (Unit 19) and A3/5 unit (McDonald's)	Designate as neighbourhood centre frontage for consistency and to allow more effective management of the frontage	Designated as neighbourhood centre frontage in the emerging new Harlow Local Plan.
Frontages not mapped and units not included in Neighbourhood Centre designation on ARHLP Proposals Map	Frontages of units at Staple Tye Shopping Mews	Active frontages of units in a variety of uses	Designate as neighbourhood centre frontage to allow more effective management of the frontage	Not designated as neighbourhood centre frontage in the emerging new Harlow Local Plan, due to insufficient justification.

Frontage type	Location (see relevant map)	Description	Potential (identified 2017)	Update – early 2019
Frontages not mapped and units not included in Neighbourhood Centre designation on ARHLP Proposals Map	Frontages of units at The Stow Service Industry Bays and additional units to the north at The Stow Neighbourhood Centre	Active frontages of units in a variety of uses	Designate as neighbourhood centre frontage for to allow more effective management of the frontage. Note: This area is subject to redevelopment, guided by The Stow SPD	Not designated as neighbourhood centre frontage in the emerging new Harlow Local Plan, due to insufficient justification.

Appendix 1: Town Centre Maps









TOWN CENTRE (2016)





Legend

Use classes



The 'existing' frontages shown on this map are those designated in the extant Adopted Replacement Harlow Local Plan (2006).

Frontage types

- Existing primary
- Existing secondary
- **Potential new primary**
- Potential new secondary 11111
- Potential removal of primary
- Potential removal of secondary





100 150 m

For clarity, not all unit numbers are displayed on this map.



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TOWN CENTRE (2013)







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Appendix 2: Neighbourhood Centres & Hatches Maps (2019)





Harlow Retail Frontages Study

OLD HARLOW NEIGHBOURHOOD CENTRE



STAPLE TYE NEIGHBOURHOOD CENTRE













Harlow Retail Frontages Study







Harlow Retail Frontages Study

























