HARLOW RETAIL FRONTAGES STUDY 2018

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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 In line with national planning policy, 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

1.4 Two types of retail frontage are found in the town centre – primary retail frontages and secondary retail frontages.

1.5 **Primary** retail frontages are areas representing core retail activity, often identifiable by high levels of pedestrian footfall, higher rents and subsequent commercial rates, the presence of national retailers, and a high proportion of shops.

1.6 **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).

1.7 The current town centre frontages are designated in the Adopted Replacement Harlow Local Plan (2006). 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

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

1.9 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).

1.10 Hatches generally consist of between two and 10 units, with neighbourhood centres containing more.

1.11 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 data completeness and effective monitoring.

Other areas

1.12 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 town.
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. It requires Local Planning Authorities to produce Local Plans which include planning policies to promote and manage competitive and growing town centres, whilst supporting their viability and vitality (including encouraging residential development – which can enhance vitality – and encouraging economic activity in declining town centres).

3.2 Additionally, the NPPF requires Local Plan policies to:
   - recognise town centres are the heart of communities, which should provide customers with choice and a diverse offer which reflects the individuality of town centres
   - define a network and hierarchy of retail centres which is resilient to economic change
   - clearly define the extent of town centres, primary shopping areas, primary frontages and secondary frontages; with associated policies for permitted uses
   - retain/re-introduce and enhance markets to ensure they are attractive and competitive
   - allocate sites to meet the scale and type of the various development required in town centres, ensuring that town centre needs are met and are not compromised by limited site availability
   - allocate edge-of-centre sites (or other accessible locations) where suitable and viable town centre sites are unavailable

3.3 The NPPF also sets out requirements for the deciding of planning applications regarding retail and town centre development.

National Planning Policy Guidance (NPPG)

3.4 The NPPG was introduced in 2014 and acts as supporting guidance to the NPPF.

3.5 It reiterates the policy set out in the NPPF regarding the vitality of town centres, but it also adds a number of other factors, including that:
   - town centres should generate local employment, promote beneficial competition within and between town centres, and create attractive, diverse places where people want to visit, live and work
   - local planning authorities should consider the different rates of development in town centres compared with out of centre, including assessment of the quantity, quality and charging of car parking

3.6 It also states that town centre strategies should be based on evidence of the current state of town centres, with identified opportunities to meet development needs and support their viability and vitality. Such strategies should consider the vision for the future of the town centre; the role,
function and hierarchy of the town centre; the possibility for the town centre to accommodate the scale of assessed need; provision of car parking and new retail floorspace; any complementary strategies which are needed; and how to manage decline positively.

3.7 Additionally, the NPPG requires local planning authorities to consider market signals when planning for town centres, and determine the health of a town centre by analysing indicators such as diversity of uses, proportion of vacancy, rents, pedestrian flows and accessibility.

3.8 Similarly to the NPPF, it requires a sequential approach to be undertaken for deciding the location of retail uses, with the analysis of the suitability, viability and availability of locations for main town centre uses, and reasoning if more central opportunities to locate main town centre uses are rejected.

3.9 The NPPG also contains guidance for the deciding of planning applications regarding retail and town centre development.
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 is being consulted on in late Spring 2018, prior to Submission in early Autumn 2018, Examination in Winter 2018/19 and Adoption in early Spring 2019. Until the adoption of the new Local Plan, the Adopted Replacement Harlow Local Plan (2006) remains the extant Local Plan for the district.

4.7 The Pre-Submission Publication version of the Local Plan contains the following policies relating to retail frontages:

Policy PR6

4.8 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.

4.9 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.

4.10 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).

4.11 The Town Centre primary and secondary frontages are to be designated in the separate Town Centre Area Action Plan (see below).
**Policy PR8**

4.12 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**

4.13 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.

4.14 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**

4.15 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).

4.16 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.

4.17 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.

4.18 The TCAAP will also designate the town centre frontages, which may be amended following the preparation of the TCAAP.
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 in early 2019.

5.2 An exceptional 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 of data and the most 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 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 the completeness of data 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.

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 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.
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 2018.

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

Table 7.a: Town centre primary frontage use classes, pre-2001 to 2018

<table>
<thead>
<tr>
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</table>

*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 2018, in order of significance.
Table 7.b: Summary of changes to town centre primary frontages, 2003 – 2018

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<th>2003 to 2009</th>
<th>2009 to 2013</th>
<th>2013 to 2018</th>
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<td>D1/2</td>
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<td>VACANT</td>
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</table>

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 In 2015, a number of units were vacant but being redeveloped. The frontages of these units were recorded as undergoing redevelopment, rather than simply being vacant, to more accurately record their status. The amount of vacant frontage fell to 3% in 2015, with 10% of frontages undergoing redevelopment. The large amount of frontage being redeveloped was a signal of investment and regeneration in the town centre.

7.6 In 2016, the large Marks & Spencer store in Broad Walk closed, meaning the amount of vacant frontage increased to 8%. Whilst most of this store was in use again within a year, the overall amount of vacant frontage increased again to 10% in 2017, mostly due to the closure of the large BHS unit in the Harvey Centre, which has a frontage length of 149m.

7.7 The impact of the closure of the BHS unit is clear: excluding the BHS unit from the data means the amount of vacant frontage recorded in 2017 is 5% rather than 10%.

7.8 The redevelopment of the first floor of the Harvey Centre was partially completed at the end of 2016, with the opening of the new cinema. New restaurant units are expected to occupy the other units currently being redeveloped. Little Walk is also undergoing redevelopment.

7.9 Once these redevelopments are complete, if the former BHS unit is (at least partially) brought back into use, the proportion of vacant frontage could reduce to levels not experienced for at least 15 years.

7.10 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.

7.11 The most notable recent change, recorded over the six-month period between July 2017 and January 2018, is the reduction in ‘redevelopment’ frontage and the increase in A3 frontage, due to the completion of the redevelopment of the Harvey Centre units.

7.12 Additionally, the large BHS unit was again in A1 use, resulting in a drop in vacant frontage and increase in A1 frontage.

7.13 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.

7.14 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.

7.15 The graphs on the following pages show the proportions of use class in each of the recorded years from 2003 to 2018. 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).

Fig. 7.1

Note: 103.4m of frontage not recorded has not been included in graph.

Fig. 7.2

Note: 67.4m of frontage not recorded has not been included in graph.
Fig. 7.3

Note: 35.6m of frontage not recorded has not been included in graph.

Fig. 7.4

Note: 35.6m of frontage not recorded has not been included in graph.
Fig. 7.5

TOWN CENTRE PRIMARY 2015

- A1, 1799.4, 70%
- VA1, 57.8, 2%
- D1, 104.6, 4%
- B1, 3.5, 0%
- Other, 28.1, 1%
- SG, 13.1, 1%
- A3/A5, 53.5, 2%
- A3, 123.4, 5%
- A2, 103.0, 4%
- R, 261.8, 10%

Fig. 7.6

TOWN CENTRE PRIMARY 2016

- A1, 1629.4, 65%
- VA1, 178.1, 7%
- VA2, 12.2, 0%
- D1, 104.6, 4%
- B1, 3.5, 0%
- Other, 28.1, 1%
- SG, 19.8, 1%
- A3/A5, 53.5, 2%
- A3, 144.4, 5%
- A2, 90.9, 4%
- R, 255.7, 10%
Fig. 7.9

TOWN CENTRE PRIMARY 2018

- A1, 1655.4, 66%
- VN/A, 19.4, 1%
- VSG, 7.8, 0%
- VA2, 12.2, 0%
- VA1, 74, 3%
- D1/D2, 130.7, 5%
- B1, 6.4, 0%
- Other, 33.6, 1%
- SG, 25.8, 1%
- A3/A5, 53.5, 2%
- A3, 125.76, 9%
- A2, 122.8, 5%
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 2018.

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

<table>
<thead>
<tr>
<th>Table 8.a: Town centre secondary frontage use classes, 2003 – 2018</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Use Class</strong></td>
</tr>
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<td>A1</td>
</tr>
<tr>
<td>A2</td>
</tr>
<tr>
<td>A3</td>
</tr>
<tr>
<td>A3/A5</td>
</tr>
<tr>
<td>A4</td>
</tr>
<tr>
<td>A5</td>
</tr>
<tr>
<td>SG</td>
</tr>
<tr>
<td>Oth</td>
</tr>
<tr>
<td>B1</td>
</tr>
<tr>
<td>D1/D2</td>
</tr>
<tr>
<td>C3</td>
</tr>
<tr>
<td>Vacant</td>
</tr>
<tr>
<td>VA1</td>
</tr>
<tr>
<td>VA2</td>
</tr>
<tr>
<td>VA3</td>
</tr>
<tr>
<td>VA5</td>
</tr>
<tr>
<td>VD1</td>
</tr>
<tr>
<td>VD2</td>
</tr>
<tr>
<td>VSG</td>
</tr>
<tr>
<td>VU</td>
</tr>
<tr>
<td>VOther</td>
</tr>
<tr>
<td>Revedt.</td>
</tr>
</tbody>
</table>

*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 2018, in order of significance.
### Table 8.b: Summary of changes to town centre secondary frontages, 2003 – 2018

<table>
<thead>
<tr>
<th></th>
<th>2003 to 2013</th>
<th>2013 to 2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>A2</td>
<td>↓ 17.9%</td>
<td>A2</td>
</tr>
<tr>
<td>A1</td>
<td>↓ 12.1%</td>
<td>SG</td>
</tr>
<tr>
<td>SG</td>
<td>↑ 7.6% (from 0%)</td>
<td>B1</td>
</tr>
<tr>
<td>Oth</td>
<td>↓ 1.6%</td>
<td>A1</td>
</tr>
<tr>
<td>1/2</td>
<td>↓ 1.0%</td>
<td>A3/5</td>
</tr>
<tr>
<td>A4</td>
<td>↑ 0.8%</td>
<td>A3</td>
</tr>
<tr>
<td>A3/5</td>
<td>↑ 0.7%</td>
<td>D1/2</td>
</tr>
<tr>
<td>A5</td>
<td>↑ 0.7%</td>
<td>Oth</td>
</tr>
<tr>
<td>B1</td>
<td>↓ 0.6%</td>
<td>A5</td>
</tr>
<tr>
<td>A3</td>
<td>↑ 0.3%</td>
<td></td>
</tr>
<tr>
<td>C3</td>
<td>↓ 0.1%</td>
<td></td>
</tr>
</tbody>
</table>

*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 ↑ 23.2% (from 0%) | VACANT ↓ 11.9% | REDEV'T ↑ 10.2% (from 0%) |

8.3 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. There was no data recorded in 2009.

8.4 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.

8.5 Considering that much of the change from A2 to Sui Generis between 2013 and 2018 was due to the national reclassifying of bookmakers in 2015, there was little change experienced between use classes during this period. The most significant change was 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 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.

8.7 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.
8.8 The graphs on the following pages show the proportions of use class in each of the recorded years from 2003 to 2018. 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).

Fig. 8.1

Note: 547.5m of frontage not recorded has not been included in graph

Fig. 8.2

Note: 135.4m of frontage not recorded has not been included in graph
Fig. 8.3

TOWN CENTRE SECONDARY 2014

Note: 135.4m of frontage not recorded has not been included in graph

Fig. 8.4

TOWN CENTRE SECONDARY 2015

Note: 135.4m of frontage not recorded has not been included in graph
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 2018.

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

Table 9.a: Neighbourhood centre frontage use classes, 2001 – 2018

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
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<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
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</thead>
<tbody>
<tr>
<td>A1</td>
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<td>61.4</td>
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<td>4.6</td>
<td>4.2</td>
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<td>0.0</td>
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<td>1.7</td>
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<td>2.9</td>
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<tr>
<td>SG</td>
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<td>6.1</td>
<td>6.1</td>
<td>6.1</td>
<td>6.1</td>
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<td>0.3</td>
<td>0.3</td>
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<td>D1</td>
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<td>1.1</td>
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<td>VA2</td>
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<td>0.0</td>
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<td>0.6</td>
<td>1.7</td>
<td>1.2</td>
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</tr>
<tr>
<td>VA5</td>
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<td>0.6</td>
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<td>0.0</td>
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<tr>
<td>Redev't</td>
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<td>0.0</td>
<td>0.0</td>
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</tr>
</tbody>
</table>

9.2 Table 9.b, overleaf, summarises the changes experienced in the neighbourhood centre frontages between 2003 and 2018, in order of significance.
Table 9.b: Summary of changes to neighbourhood centre frontages, 2003 – 2018

<table>
<thead>
<tr>
<th></th>
<th>2003 to 2009</th>
<th>2009 to 2013</th>
<th>2013 to 2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>A1</td>
<td>↓ 4.9%</td>
<td>↑ 2%</td>
<td>↓ 8.5%*</td>
</tr>
<tr>
<td>A2</td>
<td>↑ 1.6%</td>
<td>↓ 2%</td>
<td>↑ 3.7%*</td>
</tr>
<tr>
<td>D1</td>
<td>↑ 0.7%</td>
<td>↑ 1.8%</td>
<td>↑ 3%</td>
</tr>
<tr>
<td>A5</td>
<td>↑ 0.6%</td>
<td>↑ 0.5%</td>
<td>↑ 2.2%</td>
</tr>
<tr>
<td>A3</td>
<td>↑ 0.5%</td>
<td>↓ 0.5%</td>
<td>↑ 1.1%</td>
</tr>
<tr>
<td>A3/5</td>
<td>↑ 0.5%</td>
<td>↑ 0.5%</td>
<td>↓ 0.5%</td>
</tr>
<tr>
<td>VACANT</td>
<td>↑ 0.5%</td>
<td>↓ 1.7%</td>
<td>↓ 1.8%</td>
</tr>
</tbody>
</table>

*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

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.

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 Chapter 11 of this Study contains information on frontages in the neighbourhood centres 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 and assisted in the designation of amended neighbourhood centre frontages in the new Plan.

9.7 The graphs on the following pages show the proportions of use class in each of the recorded years from 2003 to 2018. 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.
Note: The data in the graphs below is based on existing frontage designations in the extant Adopted Replacement Harlow Local Plan (2006).

Fig. 9.1

Fig. 9.2

Note: 4.2m of frontage not recorded has not been included in graph.
Fig. 9.7

**NEIGHBOURHOOD CENTRES 2018**

- A1, 616.4, 62%
- VA1, 57.1, 6%
- A2, 42.4, 4%
- A3, 33.4, 3%
- A3/A5, 29.6, 3%
- C1, 10.9, 1%
- C3, 10.3, 1%
- D1, 24.4, 4%
- D2, 14.45, 1%
- Other, 61.2, 6%
- SG, 64.85, 6%

Legend:
- A1
- A2
- A3
- A3/A5
- A5
- SG
- Other
10. Findings: Hatch Frontages

10.1 Table 10.a, below, summarises the main changes experienced in the designated hatch frontages up to 2018.

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

Table 10.a: Hatch frontage use classes, 2001 – 2018

<table>
<thead>
<tr>
<th></th>
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<tr>
<td>A1</td>
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</tr>
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<td>0.0</td>
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<td>1.7</td>
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<td>3.3</td>
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<td>0.0</td>
</tr>
<tr>
<td>VB1</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
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<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>VA3/5</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>1.7</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
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<td>Redev't</td>
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<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>1.5</td>
</tr>
</tbody>
</table>

10.2 Table 10.b, below, summarises the changes experienced in the neighbourhood centre frontages between 2003 and 2018, in order of significance.

Table 10.b: Summary of main changes to hatch frontages, 2003 – 2018

<table>
<thead>
<tr>
<th></th>
<th>2003 to 2009</th>
<th>2009 to 2013</th>
<th>2013 to 2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>A1</td>
<td>↓ 8.3%</td>
<td>B1 ↑ 1.7%</td>
<td>A1 ↓ 4.6%</td>
</tr>
<tr>
<td>A3</td>
<td>↑ 5.4%</td>
<td>SG ↑ 1.7%</td>
<td>A2 ↓ 8.6%</td>
</tr>
<tr>
<td>A2</td>
<td>↓ 2.2%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>D1</td>
<td>↑ 1.7%</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*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.
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.

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 2018.
Note: The data in the graphs below is based on frontage designations in the extant Adopted Replacement Harlow Local Plan (2006).
11. Frontages requiring further review

11.1 The National Planning Policy Framework sets a requirement that primary and secondary retail frontages in town centres must be designated in a Local Plan, but the acceptable proportions of retail and non-retail uses in these frontages is for the Local Planning Authority to decide.

11.2 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.

11.3 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).

11.4 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.

11.5 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.

11.6 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.

11.7 Frontages of units in hatches with fewer than five units and certain parts of neighbourhood centres (plus Church Langley neighbourhood centre in its entirety) are not designated in the extant Adopted Replacement Harlow Local Plan (2006) (ARHL). Recommendations are made in the table below as to whether these frontages could be designated and mapped in the new Harlow Local Plan.
11.8 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.

11.9 Additionally, the policy regarding hatch frontages 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.

11.10 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).

11.11 It is expected that between late Spring and Summer 2018, the Pre-Submission Publication Harlow Local Plan and the first stage (Issues and Options) of the TCAAP will be consulted on.
Table 11.1: Frontages requiring further review

<table>
<thead>
<tr>
<th>Frontage type</th>
<th>Location (see relevant map)</th>
<th>Description</th>
<th>Potential (identified 2017)</th>
<th>Update – early 2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>Primary</td>
<td>Western &amp; southern side of Unit 24, Harvey Centre</td>
<td>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</td>
<td>Retain, to allow opportunity for creating more active frontage</td>
<td>The ongoing preparation of the Harlow Town Centre Area Action Plan (HTCAAP) will consider this.</td>
</tr>
<tr>
<td>Primary</td>
<td>Central Library frontage</td>
<td>Active frontage of the Library, but this is not a retail use</td>
<td>Retain, to allow opportunity for partial or whole change of frontage to retail use. (Note: there are currently no plans for this to happen.)</td>
<td>The ongoing preparation of the HTCAAP will consider this.</td>
</tr>
<tr>
<td>Primary</td>
<td>Western frontage of 39 Redstone House</td>
<td>Blank wall of side of large A1 unit, with store signs</td>
<td>Retain, to allow opportunity for creating more active frontage.</td>
<td>The ongoing preparation of the HTCAAP will consider this.</td>
</tr>
<tr>
<td>Primary</td>
<td>Entrance to Redstone House</td>
<td>Entrance lobby to office block (currently in process of conversion to contain residential use)</td>
<td>Remove - no opportunity for bringing into an active frontage as it is a small entrance lobby</td>
<td>The ongoing preparation of the HTCAAP will consider this.</td>
</tr>
<tr>
<td>Secondary</td>
<td>Northern frontage of 37 Redstone House</td>
<td>Blank wall of side of large A1 unit, with store signs</td>
<td>Retain, to allow opportunity for creating more active frontage</td>
<td>The ongoing preparation of the HTCAAP will consider this.</td>
</tr>
<tr>
<td>Secondary</td>
<td>Mitre House, West Square</td>
<td>Active frontage of office block/entrance, but this is not a retail use</td>
<td>Remove - no opportunity for bringing into retail use as it is part of a larger office</td>
<td>The ongoing preparation of the HTCAAP will consider this.</td>
</tr>
<tr>
<td>Frontage not mapped</td>
<td>Description</td>
<td>Designation &amp; Remarks</td>
<td></td>
<td></td>
</tr>
<tr>
<td>---------------------</td>
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<td>-----------------------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Eastern end of northern frontage of 37 Redstone House</td>
<td>Entrance to large A1 unit</td>
<td>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.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Post Office (and alley space) to east of Market House</td>
<td>Active frontage of the Post Office</td>
<td>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.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Western, northern &amp; eastern frontage of 73 Bush Fair (Sherwood House)</td>
<td>Active frontage of A2 unit</td>
<td>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.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Western &amp; southern frontages of pharmacy &amp; surgery/dentist and</td>
<td>Active frontages of units in a variety of uses</td>
<td>Designate as neighbourhood centre frontage for consistency and to Designated as neighbourhood centre frontage in the emerging new Harlow Local Plan.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Centre designation on ARHLP Proposals Map</td>
<td>Frontages not mapped, but units included in Neighbourhood Centre designation on ARHLP Proposals Map</td>
<td>Designation as neighbourhood centre frontage for consistency and to allow more effective management of the frontage</td>
<td>Not designated as neighbourhood centre frontage in the emerging new Harlow Local Plan, due to insufficient justification.</td>
<td></td>
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<tr>
<td>------------------------------------------</td>
<td>-----------------------------------------------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td>southern, western &amp; northern frontages of Tesco and Units 1 – 4, Church Langley Neighbourhood Centre</td>
<td>Western frontage of McDonald’s and northern frontage of Unit 19, Staple Tye Neighbourhood Centre</td>
<td>Designate as neighbourhood centre frontage to allow more effective management of the frontage</td>
<td>Designated as neighbourhood centre frontage in the emerging new Harlow Local Plan.</td>
<td></td>
</tr>
<tr>
<td>Designate as neighbourhood centre frontage for consistency and to allow more effective management of the frontage</td>
<td>Designate as neighbourhood centre frontage to allow more effective management of the frontage</td>
<td>Not designated as neighbourhood centre frontage in the emerging new Harlow Local Plan, due to insufficient justification.</td>
<td>Designated as neighbourhood centre frontage in the emerging new Harlow Local Plan.</td>
<td></td>
</tr>
<tr>
<td>Designate as neighbourhood centre frontage to allow more effective management of the frontage</td>
<td>Not designated as neighbourhood centre frontage in the emerging new Harlow Local Plan, due to insufficient justification.</td>
<td>Designated as neighbourhood centre frontage in the emerging new Harlow Local Plan.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Designate as neighbourhood centre frontage for to allow more effective management of the frontage. Note: This area is subject to redevelopment, guided</td>
<td>Designated as neighbourhood centre frontage in the emerging new Harlow Local Plan.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Designate as neighbourhood centre frontage for to allow more effective management of the frontage. Note: This area is subject to redevelopment, guided</td>
<td>Not designated as neighbourhood centre frontage in the emerging new Harlow Local Plan, due to insufficient justification.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Proposals Map</td>
<td>by The Stow SPD</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>---------------</td>
<td>-----------------</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Frontages not mapped, but units included in Neighbourhood Centre designation on ARHL Proposals Map</td>
<td>Designate as hatch frontage for consistency and to allow more effective management of the frontage</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Frontages of units at Clifton, Coppice, Elm, Katherines, Manor, Maunds, Pollard, Pypers, Sherards, Sumners and Ward Hatches</td>
<td>No hatch frontages designated as in the emerging new Harlow Local Plan (instead the policy focusses on each hatch as a whole).</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Active frontages of units in a variety of uses. Currently recognised as hatches in the ARHL but frontages not mapped in supporting documents</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Appendix 1: Town Centre Maps
The 'existing' frontages shown on this map are those designated in the extant Adopted Replacement Harlow Local Plan (2006).
The 'existing' frontages shown on this map are those designated in the extant Adopted Replacement Harlow Local Plan (2006).

**Legend**

**Use classes**
- A1
- A2
- A3
- A3/A5
- A4
- A5
- SG
- B1 / C3 / D1 / D2 / Other
- Vacant
- Undergoing redevelopment
- No record

**Frontage types**
- Existing primary
- Existing secondary
- Potential new primary
- Potential new secondary
- Potential removal of primary
- Potential removal of secondary

For clarity, not all unit numbers are displayed on this map.
The 'existing' frontages shown on this map are those designated in the extant Adopted Replacement Harlow Local Plan (2006).

Legend

Use classes
- A1
- A2
- A3
- A3/A5
- A4
- A5
- SG
- B1 / C3 / D1 / D2 / Other
- Vacant
- Undergoing redevelopment
- No record

Frontage types
- Existing primary
- Existing secondary
- Potential new primary
- Potential new secondary
- Potential removal of primary
- Potential removal of secondary

For clarity, not all unit numbers are displayed on this map.
The 'existing' frontages shown on this map are those designated in the extant Adopted Replacement Harlow Local Plan (2006).

**Legend**

**Use classes**
- A1
- A2
- A3
- A3/A5
- A4
- A5
- SG
- B1 / C3 / D1 / D2 / Other
- Vacant
- Undergoing redevelopment
- No record

**Frontage types**
- Existing primary
- Existing secondary
- Potential new primary
- Potential new secondary
- Potential removal of primary
- Potential removal of secondary

For clarity, not all unit numbers are displayed on this map.
The 'existing' frontages shown on this map are those designated in the extant Adopted Replacement Harlow Local Plan (2006).

**Legend**

**Use classes**
- A1
- A2
- A3
- A3/A5
- A4
- A5
- SG
- B1 / C3 / D1 / D2 / Other
- Vacant
- Undergoing redevelopment
- No record

**Frontage types**
- Existing primary
- Existing secondary
- Potential new primary
- Potential new secondary
- Potential removal of primary
- Potential removal of secondary

For clarity, not all unit numbers are displayed on this map.
The ‘existing’ frontages shown on this map are those designated in the extant Adopted Replacement Harlow Local Plan (2006).

**Legend**

- **Use classes**
  - A1
  - A2
  - A3
  - A3/A5
  - A4
  - A5
  - SG
  - B1 / C3 / D1 / D2 / Other
  - Vacant
  - Undergoing redevelopment
  - No record

- **Frontage types**
  - Existing primary
  - Existing secondary
  - Potential new primary
  - Potential new secondary
  - Potential removal of primary
  - Potential removal of secondary

For clarity, not all unit numbers are displayed on this map.
The 'existing' frontages shown on this map are those designated in the extant Adopted Replacement Harlow Local Plan (2006).
The 'existing' frontages shown on this map are those designated in the extant Adopted Replacement Harlow Local Plan (2006).
The ‘existing’ frontages shown on this map are those designated in the extant Adopted Replacement Harlow Local Plan (2006).
Appendix 2: Neighbourhood Centres & Hatches Maps (2018)
The frontages shown on this map are those designated in the emerging new Harlow Local Plan. They remain unchanged from the extant Adopted Replacement Harlow Local Plan (2006).
The frontages shown on this map are those designated in the emerging new Harlow Local Plan. They were previously not designated in the Adopted Replacement Harlow Local Plan (2006).

For clarity, not all unit numbers are displayed on this map.
The frontages shown on this map are those designated in the emerging new Harlow Local Plan. They remain unchanged from the extant Adopted Replacement Harlow Local Plan (2006).
The frontages shown on this map are those designated in the emerging new Harlow Local Plan, which were amended from the original frontages in the extant Adopted Replacement Harlow Local Plan (2006).
The frontages shown on this map are those designated in the emerging new Harlow Local Plan. They remain unchanged from the extant Adopted Replacement Harlow Local Plan (2006).
There are no frontages shown on this map as the emerging new Harlow Local Plan does not designate hatch frontages.

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(Harlow District Council Licence No.100019627) (2018)
There are no frontages shown on this map as the emerging new Harlow Local Plan does not designate hatch frontages.
There are no frontages shown on this map as the emerging new Harlow Local Plan does not designate hatch frontages.
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There are no frontages shown on this map as the emerging new Harlow Local Plan does not designate hatch frontages.

Legend

Use classes
- A1
- A5
- S6
- B1 / C3 / D1 / D2 / Other

For clarity, not all unit numbers are displayed on this map.
There are no frontages shown on this map as the emerging new Harlow Local Plan does not designate hatch frontages.
There are no frontages shown on this map as the emerging new Harlow Local Plan does not designate hatch frontages.
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