Epping Forest District Council

Epping Forest District Local Plan

Town Centres Review

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Ove Arup & Partners Ltd
13 Fitzroy Street
London
W1T 4BQ
United Kingdom
www.arup.com

ARUP

Contents

1 Introduction

The Epping Forest District Local Plan (1998) and Alterations (2006) is the current adopted Local Plan. The Council is currently preparing a new Local Plan for Epping Forest District, which will cover the period up to 2033.

As part of the evidence base for the emerging Local Plan, a review of each of the 12 defined settlements[1] and Town and Small District Centres[2] within Epping Forest District has been completed. The review of the defined settlements across nine key themes has informed the development of place-specific visions and aspirations to inform the process of site selection and allocation within the draft Local Plan and feed into policy drafting for places and settlements in the District. The findings of the settlements review is reported in the Report on Site Selection, Arup (September 2016).

The review of the District's Town and Small District Centres addresses all six of the Principal, Smaller and District Centres identified in Local Plan Policy TC1, and the Town and Small District Centres[3] set out in the Town Centre Study (2010). A Town Centre 'Health Check' has been completed for each centre (Section 2), which provides an overview of the District's Town Centres in terms of population and retail floorspace, and recent changes in the composition of the retail offer within each centre. Future Town Centre needs have been examined (Section 3) based upon National Planning Policy Framework requirements, expected population changes, evolving consumer demands, employment projections and the current development pipeline. Different options for future retail provision within the District are presented based upon the health check analysis. Finally, a number of suggestions for future Town Centre policy within the District are outlined (Section 4), alongside specific recommendations tailored to the needs of each of the six centres.

[1] Settlement Hierarchy Technical Paper, Epping Forest District Council (September 2015) Table 4 – Epping Forest District Settlement Hierarchy
[2] Town Centres Study, Roger Tym and Partners (2010)
[3] Ibid.

2 Town Centres

2.1 Context

The nature of Town Centres and high streets is changing, particularly with the rise on online retailing. However, while the rate of growth of internet retailing has been very impressive in recent years the vast majority of retailing in the UK still happens in 'bricks and mortar' shops. According to the Office of National Statistics, the total volume of retail sales in real terms by online channels accounted for 14.3% per annum. Arguably, Town Centres and high streets are still a necessity; however it is the way in which they function that is likely to undergo adaptation in order to meet the changing needs of the consumer.

In Epping Forest District the focus has been on maintaining small centres that meet convenience and some comparison shopping needs, recognising the relationship to larger establish centres outside the District such as Harlow, Enfield, Romford Lakeside, and the more recent Westfield shopping centre at Stratford. While there is a loss of revenue to other centres, and it is suggested that the opening of strong trading offers such as Westfield have further consolidated this position, this approach supports the form of centres that the District wishes to promote.

Looking ahead it is expected that high streets of the future will continue to produce income for business interests, but not just through selling goods to walk-in customers. Services such as coffee shops and nail bars, which cannot be replicated on the internet, will continue to thrive. Indeed, in a move away from the traditional composition of the high street, the review conducted by Mary Portas in 2011 recommended that high streets become '*multifunctional and social places which offer a clear and compelling purpose and experience that's not available elsewhere*'.

Additionally, the changes to permitted development rights[4] that were introduced in 2013 and 2014, are expected to continue to impact upon the future of Town Centres. Schedule 2, Part 3, Classes M and O allow change of use from shops (A1) and offices (B1a) to residential (C3) subject to certain restrictions and a prior approval process. Some areas have identified that this change has resulted in substantial changes to town centre areas, although the trend is less marked in Epping Forest District to date. However, as there is increasing demand for housing the permitted development rights may be used more widely in the District with an impact on the form of Town Centres, which could impact upon their function and vitality if not properly considered and managed. There are also permitted development rights that allow certain changes between A Class uses subject to restrictions (Schedule 2, Part 3, Classes A to H), and which can affect the offer within town centres and thus attractiveness to consumers.

For Epping Forest District, it is important to establish an accurate picture of the composition and 'health' of the town and other centres today in order to

[4] The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended)

understand how they currently function and how best to plan for their future. The preparation of the Local Plan is an opportunity to review existing and set, where appropriate, new planning policies to actively support and encourage thriving town and other centres with vibrant, diverse high streets where people want to shop, socialise and spend time interacting.

2.2 Epping Forest District Town Centres

Policy TC1 of the Local Plan (1998) and Alterations (2006) set out a four tier network of centres: three 'principal' centres, two 'smaller' centres; a single centre occupying a third tier termed 'district' and a fourth tier covering eleven 'local' centres which tend to consist of small parades of shops addressing very local needs.

A subsequent technical review was undertaken in 2010, which considered only the six main centres. The Roger Tym and Partners Town Centre Study (2010) recommended a rationalisation of the centres hierarchy into a two tiered structure of Town Centres (consisting of two of the three former 'principal' centres) and four 'Small District Centres' (comprising of one former 'principal' centre, two former 'smaller' centres and the only 'district' centre). Essentially, three old tiers were compressed into two tiers and this involved a *de facto* downgrading in the status of Waltham Abbey from a fully-fledged 'principal' centre to a 'smaller district centre'. No specific recommendations were presented for the lowest tier of centres.

The categorisation of each centre in the Local Plan (1998) and Alterations (2006) and the Town Centre Study is shown in Table 1 below:

Table 1: Centre Hierarchies[5]

Centre	Local Plan (1998) and Alterations (2006) – Policy TC1	Town Centre Study Recommendations 2010
Epping	Principal (1st tier)	Town Centre
Loughton High Road	Principal (1st tier)	Town Centre
Waltham Abbey	Principal (1st tier)	Small District Centre
Chipping Ongar	Smaller (2nd tier)	Small District Centre
Loughton Broadway	Smaller (2nd tier)	Small District Centre
Buckhurst Hill	District (3rd tier)	Small District Centre
Abridge	Local (4th tier)	No recommendations
Buckhurst Hill – Loughton Way, Lower Queens Road, Queens Road west, Station Way	Local (4th tier)	No recommendations
Chigwell - Brook Parade, Limes Farm, Manor Road	Local (4th tier)	No recommendations
Coopersale - Parklands	Local (4th tier)	No recommendations

[5] Combined Policies of Epping Forest District Local Plan (1998) and Alterations (2006) and the Town Centres Study, Roger Tym and Partners (2010)

Centre	Local Plan (1998) and Alterations (2006) – Policy TC1	Town Centre Study Recommendations 2010
Chipping Ongar – Lower High Street, St Peters Avenue, Fyfield Road	Local (4th tier)	No recommendations
Epping – Lindsey Street	Local (4th tier)	No recommendations
Loughton – Borders Lane, Goldings Hill/Lower Road, Pyrles Lane, Roding Road/Valley Hill	Local (4th tier)	No recommendations
Nazeing – Nazeingbury Parade	Local (4th tier)	No recommendations
North Weald Bassett – High Road	Local (4th tier)	No recommendations
Theydon Bois – Coppice Row/Forest Drive	Local (4th tier)	No recommendations
Waltham Abbey – Highbridge Retail Park, Ninefields, Roundhills, Upshire Road	Local (4th tier)	No recommendations

2.3 Town Centres' Health Check

The health of Epping Forest District's network of centres can be considered at a number of different spatial levels. Understanding the 'health' of Epping Forest District's Town Centres and how they have, or have not changed in recent years is relevant to understanding how policy may need to adapt. Key factors that influence the 'health' of the centres include: an understanding of how population has changed; change in quantum of floorspace; and property level data.

2.3.1 Population

As a local service, key driver of centre performance is the catchment population and its ability to spend money in shops. Table 2[6] reviews the population growth recorded for Epping Forest District relative to the centres and neighbouring local authorities alongside a county and national benchmark. Epping Forest District's growth was 3% over a ten year period, half that of Essex as a whole and almost a third of England's 8% growth rate. By comparison the London boroughs have tended to achieve double digit growth rates, although Essex authorities' growth rates tend to be lower.

[6] Based on aggregations of output areas representing 2011 Wards and Parishes using ONS Geodata conforming to the Epping Forest Settlement Hierarchy Technical Paper 2015 definitions for settlements – accessed 15th July 2016

Table 2: Population Growth 2001 to 2011

Town Centres	2001	2011	Change 2001 - 2011
Epping Forest District	120,896	124,659	3%
Epping Town	10,662	11,461	7.5%
Chipping Ongar	6,069	6,251	3.0%
Loughton Debden	30,340	31,106	2.5%
Waltham Abbey	18,247	18,913	3.6%
Buckhurst Hill	10,738	11,380	6.0%
Chipping Ongar	6,069	6,251	3.0%
Essex	1,310,835	1,393,587	6%
Brentwood	68,456	73,601	8%
Broxbourne	87,054	93,609	8%
Chelmsford	157,072	168,310	7%
East Hertfordshire	128,919	137,687	7%
Harlow	78,768	81,944	4%
Uttlesford	68,946	79,443	15%
Enfield	273,559	312,466	14%
Havering	224,248	237,232	6%
Redbridge	238,635	278,970	17%
Waltham Forest	218,341	258,249	18%
England	49,138,831	53,012,456	8%

(Source: Census of Population Table (Various) 2001 and 2011 on Resident Population)

Within the District, Epping and Buckhurst Hill have exceeded the average growth rate achieving a 7.5% and 6.0% growth rate respectively. The relative growth rates must reflect, in part, the fact that Epping Forest District's growth has been historically constrained. It does, nevertheless, suggest that there has been a change in the spending power generated by the area over the period covered by the censuses. This increase in spending power does not however infer conversion to additional demand for retail space as this is dependent upon the ability of the area to retain expenditure generated within its borders.

2.3.2 Retail Floorspace

Another source of evidence is the degree to which the market has recognised and acted upon the potential offered by the population growth. Evidence from the Valuation Office for the District suggests that the stock of retail space in the area has been increasing over the period 2009 to 2012 and stood at 163,000 sq.m. in 2012. The rate of growth in the District has exceeded the average for the County and shares second rank position for the level of growth achieved in retail floorspace since 2009, behind Maldon (a position shared with Colchester and Rochford).

Table 3: Index of retail floorspace change 2009 to 2012[7]

Settlement	2009	2010	2011	2012
Essex	100	101	102	102
Basildon	100	100	102	101
Braintree	100	100	101	101
Brentwood	100	99	99	100
Castle Point	100	101	101	101
Chelmsford	100	102	103	103
Colchester	100	101	101	104
Epping Forest District	100	101	104	104
Harlow	100	99	100	101
Maldon	100	100	104	106
Rochford	100	105	105	104
Tendring	100	102	102	102
Uttlesford	100	101	101	103

2.3.3 Property Level Data

Historic data on population and floorspace can only provide a high level of understanding concerning the health of centres. A more detailed picture is available through a micro analysis of the centres themselves.

As part of the Town Centre Study (2010) property level data was collected for each of the top three tiers of centres (as designated in the Local Plan (1998) and Alterations (2006) based on the boundaries defined on the Local Plan Proposals Map. This data specified use class and floorspace. Following the adoption of the existing Local Plan (1998) and Alterations (2006), the Council also undertook its own monitoring surveys of the same centres to review progress on delivery of Policy TC4 related to the proportion of retail frontages. The existence of the two datasets across two points in time, theoretically allowed trends in the way centres are used to be established.

There are, however, a number of inconsistencies between the datasets which make comparison difficult. Council data recorded frontage lengths of units whereas the Town Centre Study (2010) recorded unit floorspace. In addition the geographic area within which data was collected varied between the two surveys. This made any comparison of overall summary results impossible.

For the purposes of the Town Centre Health Checks, therefore, the raw data from the Council Monitoring Surveys was reviewed to identify and remove areas of inconsistency between 2009 surveys and more recent updates, with a view to creating a comparable dataset. The data review included: removing units where

[7] Valuation Office https://www.gov.uk/government/statistics/business-floorspace-experimental-statistics

they represented ground floor doorways to above ground units to avoid over counting ground floor town centre uses; identifying and rectifying counting discrepancies; a full cross-check of the Uses Classes ascribed to each unit to identify and update discrepancies, using site visit data where applicable; and each unit from the 2009 data was mapped by address and cross-checked against the 2015 data to ensure a consistent spatial geography was utilised in the Health Checks.

Trends were established by matching the individual property records in 2010[8] from the Town Centre Study with period survey data for 2013/2015 or 2016[9] from the Council Monitoring Surveys. For each matched property record it was assumed that frontages recorded in 2013/2015 and 2016 were unchanged. Similarly, floorspace recorded in 2010 was assumed to carry forward to the future date when a Council survey was conducted.

Using this methodology, an assessment was undertaken of trends in the way each of the Town and Small District Centres are used. The analysis reviewed three indicators – units, frontages and floorspace for Key Frontages (aligned with policy TC4 in the Local Plan (1998) and Alterations (2006) and non-Key Frontages (not recognised in policy terms but monitored by the Council). The cleansed datasets for 2010 and 2013-16 town centre uses are shown in Appendix A of this report. A summary of the findings from these surveys is provided below:

Epping

The 2009 Town Centre survey for Epping reviewed 157 units, representing 25,260 sq.m. of floorspace and 1,279 metres of frontage. Of this, a total of 94 units (657 metres and 14,560 sq.m.) were designated as Key Frontage in the Local Plan (1998) and Alterations (2006). A follow up survey was undertaken in October 2015, and reveals a small reduction in the number of units within the Town Centre, with a total of 156 units surveyed (25,160 sq.m. and 1,273 metres). The Key Frontage surveyed remained the same.

A key concern in the Town Centre is the degree to which retailing has sustained its presence over the period of 2009 to 2015. In 2009, 69 of the 94 Key Frontage units were retail (A1) uses. In 2015, the proportion of retail within Key Frontages slightly reduced in relation to other uses to 65 units, with four former retail (A1) units having changed use to non-retail uses, including *sui generis*, leisure (D2) and restaurants (A3)[10]. Overall, in Epping's Key Frontages between 2009 and 2015, there was a 6% reduction in the number of units; a 5% reduction in retail frontage length, and a 3% reduction in retail floorspace.

The change in the retail/non-retail mix has been more pronounced in the non-Key Frontages, as expected given that non-Key Frontages lack specific protection for retail uses. Over the same period, Epping's non-Key Frontages experienced the loss of 11 retail (A1) units bringing the total to 26 units within the non-Key

[8] Town Centres Study, Roger Tym and Partners (2010)
[9] Epping Forest District Council Town Centre Surveys (2013-2016) – Surveys undertaken by the Council detailing the Town Centre uses in settlements.
[10] For the purposes of this study, non-retail uses means anything not designated as A1 class use.

Frontage. The majority of these were lost to other A class uses (A2-A5) or *sui generis*. This represents a 30% reduction in retail units in non-Key Frontages from 2009 to 2015; a 28% loss of retail Frontage length, and a 10% loss of retail floorspace.

Some units in the non-Key Frontages were also lost to vacancies in the Town Centre. These increased from one unit in 2009 (0.5% of all units) to three units in 2015 (2% of all units), concentrated in non-Key Frontages.

Loughton High Road

The 2009 survey of Loughton High Road reviewed 210 units within the Town Centre, which amounted to 37,660 sq.m. of Town Centre floorspace and 2,007 metres of Town Centre frontage. Of this, a total of 130 units were designated as Key Frontage in the Local Plan (1998) and Alterations (2006). A more recent survey undertaken in August 2015, identified a small reduction in the number of units within the Town Centre, with a total of 209 units surveyed (1,999 metres of Town Centre frontage) although an increase in floorspace at 37,890 sq.m. The Key Frontage surveyed also reduced to 129 units in 2015.

As the largest area of retail within the District, the degree to which retail has sustained its presence within Loughton High Road is of significance. In the Town Centre's Key Frontages, the proportion of retail uses marginally reduced from 2009 to 2015. In 2009, 96 of the 130 units in Key Frontages were in retail (A1) use, but in 2015 this reduced to 91 of 129, with five former retail (A1) units having changed use to non-retail uses (the majority becoming vacant, see below). This represents a 5% reduction in retail units; a 2% reduction in retail Frontage and a 1% reduction in retail floorspace.

The Town Centre's non-Key Frontages have seen a larger decrease in the proportion of retail uses. In 2009 the 71 non-Key Frontage units surveyed contained 33 retail units. In 2015, there was a loss of nine retail units to non-retail uses to 24 out of a total of 70 non-Key Frontage units. This represents a 27% unit reduction, a 14% loss of retail Frontage length and a 19% loss of retail floorspace. The majority of retail units have changed use to either other A class uses or become vacant. There is also evidence of change of use of five units to residential (C3).

Loughton High Road has shown a largely consistent vacancy rate, with only a small increase in vacant units from nine in 2009 to ten in 2015. A number of these vacancies are located within Key Frontages.

Loughton Broadway

Survey data analysed for Loughton Broadway in 2009 covered 69 units in the Town Centre, totalling 11,410 sq.m. of Town Centre floorspace and 582 metres of Town Centre frontage. Of this, a total of 40 units were designated as Key Frontage in the Local Plan (1998) and Alterations (2006). A more recent survey was undertaken in August 2015 covering the same units and measurements.

In comparison with other centres within the District, Loughton Broadway has experienced a significant reduction in the number of retail units in both its Key Frontage and its non-Key Frontage. In 2009, of the 40 units with Key Frontage, 37 were retail (A1) uses. This reduced to 30 units in 2015, representing a 19% reduction. This in turn represents a 19% reduction in retail Frontage length and a 17% reduction in retail floorspace. In non-Key Frontages over the same period, there was a loss of four retail units (from 14 of the total 28, to 10 in 2015), with a resultant reduction of 46 metres of Frontage, representing a 38% reduction in retail non-Key Frontage length. Non-Key Frontages also experienced a reduction in non-retail uses, with the number of occupied non-retail units falling by five units (representing a fall of 36%).

The reason for this reduction in retail and non-retail uses in Loughton Broadway, in both Key and non-Key Frontages was the large increase in vacancies witnessed from 2009 to 2013, with the number of vacant units increasing from one to 12 over the six year period. This increase in vacancies can be attributed to the redevelopment of the Sainsbury's superstore on the edge of the Broadway. This required the demolition of a number of former retail and other Town Centre use units to allow for the expansion of the store. The perceived increased vacancy rate in Loughton Broadway should, therefore, be considered in this context.

Buckhurst Hill

A survey was undertaken in 2009 of 100 units in Buckhurst Hill, with a total floorspace of 11,568 sq.m. and 732 metres of Town Centre frontage. Of this, a total of 38 units were designated as Key Frontage in the Local Plan (1998) and Alterations (2006). An updated survey was undertaken in August 2015 covering the same units and measurements.

Within the Key Frontages, the proportion of retail uses has remained largely constant from 2009 to 2015. Of the 38 Key Frontages in 2009, 25 were in retail (A1) use, which reduced to 24 in 2015. However, given that Buckhurst Hill has a smaller retail offer than other centres in the District, this one unit loss represents a 4% reduction in retail units, meaning that Buckhurst Hill has experienced a similar relative decline in Key Frontage Retail to other centres such as Epping, Loughton High Road and Waltham Abbey. The loss of the retail unit to non-retail use equates to a 2% reduction in retail Frontage and a 1% reduction in retail floorspace.

The change in retail/non-retail mix between 2009 and 2015 is more pronounced in Buckhurst Hill's non-Key Frontages, with the loss of three units reducing the total retail non-Key frontages from 32 of 57 to 29 in 2015. This represents a 9% reduction; a 16% loss of retail (A1) Frontage length and an 8% loss of retail floorspace. The majority of changing use retail units in non-Key Frontage became other A class uses.

In contrast to other centres in the District, Buckhurst Hill experienced a small increase in the number of occupied units between 2009 and 2015, with the number of vacancies decreasing from five units in 2009 to two units in 2015.

Waltham Abbey

The 2009 Town Centre study of Waltham Abbey surveyed 71 units when surveyed in 2009, with a total of 7,420 sq.m. of floorspace and 702 metres of Town Centre frontage. Of this, a total of 29 units were designated as Key Frontage in the Local Plan (1998) and Alterations (2006). A follow-up survey was undertaken in 2015 covering the same units and measurements.

In the Key Frontages, the retail/ non retail mix marginally slipped from 2009 to 2013 in favour of non-retail uses. In 2009, 25 of the 29 Key Frontages were in retail (A1) use, compared to 24 in 2013. The lost retail unit was vacant in 2013. Waltham Abbey's Key Frontage has therefore experienced a similar relative decline in retail units to other centres such as Epping, Loughton High Road and Buckhurst Hill. The loss of this single retail unit has resulted in a 6% reduction in retail Frontage length and a less than 1% reduction in retail floorspace.

The change in retail mix of non-Key Frontages has also been marginal over the same period, with the loss of one retail unit meaning a reduction from 14 to 13 non-Key Frontage retail units.

The vacancy rate remained constant from 2009 to 2013, at three of the total 71 units.

Chipping Ongar

The 2009 review of Chipping Ongar surveyed 66 units, representing 6,020 sq.m. of floorspace and 626 metres of Town Centre frontage. Of this, a total of 27 units were designated as Key Frontage in the Local Plan (1998) and Alterations (2006). An updated survey was undertaken in 2016 to reveal the current status of retail within the centre covering the same units and measurements.

In the Key Frontages, the proportion of retail has marginally reduced from 19 of the total 27 units in 2009, to 18 units in 2016. Chipping Ongar's Key Frontage has therefore experienced a similar relative decline in retail units to other centres such as Epping, Loughton High Road, Buckhurst Hill and Waltham Abbey. However, the retail unit lost to non-retail uses appears to be significant in size, representing a 14% reduction in retail Frontage length and under 5% reduction in floorspace.

Chipping Ongar is unique in being the only centre analysed where the proportion of retail uses (A1) has increased within the non-Key Frontages, with a growth of four retail units and a reduction of six non-retail units (made up of two units falling vacant and four units changing use to retail), resulting in 31 retail units within non-Key Frontage in 2016.

Overall, the number of occupied units fell by two units between 2009 and 2016, with a vacancy of seven units in 2016, compared to five in 2009.

Summary

Overall, all six centres showed a significant variation in the health of centres with occupied units remaining remarkably stable with one exception. Data for Epping town and Loughton High Road demonstrate why they occupy top positions in the

centre's hierarchy and are, therefore, critical barometers for the general condition of the District's centres. Both centres have seen a marginal reduction in occupied frontages over the survey period. The results do however suggest that non-retail uses are making some limited incursions into the Key Frontages (defined under policy TC4 in the Local Plan (1998) and Alterations (2006)).

The growth of non-retail uses is, however, much more marked within non-Key Frontage areas of these centres, however the overall lengths of Frontages affected are relatively small. Of the remaining Small District Centres (referring to the term used by Roger Tym & Partners), Buckhurst Hill and Waltham Abbey are cases where the number of occupied units has either remained static or increased. Otherwise, in both cases, there is also evidence of marginal incursions (changing status of one unit often) of non-retail uses; however given the smaller offer of these centres, even a small change in the number of retail units can have significant effects on the proportion of retail.

Chipping Ongar runs counter to the prevailing trend with an expansion of retail (A1) activity outside the Key Frontage areas. This may in part be attributable to the later date of survey reflecting a more advanced stage in the economic recovery and consumer expenditure. Loughton Broadway displays more concerning characteristics with a contraction in occupied units including non-retail uses outside the non-Key Frontages. This may reflect the dynamics of its more localised catchment area.

3 Future Town Centre Needs

So far, historic data has been the focus of analysis which has shown some limited growth in retailing floorspace and population. The emerging Local Plan is however concerned with planning for new provision.

A standard approach to establishing future retail need is to use modelling techniques to forecast the level of expenditure generated by an area, and determine how much of that expenditure is capable of being retained by the area concerned (based on an appreciation of the relative attractiveness of centres compared with the offer available from outside the local authority under consideration). In the current climate, assessment of the ability to retain expenditure must also account for the impact of the internet, which effectively displaces the need for additional retailing capacity (often in favour of more distant distribution facilities).

Forecasting also considers demand from a growth in population as defined in official population forecasts. Having established the level of expenditure retained by centres within a local authority and allowing for inflows from neighbouring areas, floorspace volumes are forecast by applying assumptions concerning the level of turnover per sq.m. Models also make allowances for the presence of under- or over-trading within existing floorspace.

As part of the Town Centre Study (2010) (TCS) a model was used to forecast retail need in the District. This model was used to assess retail need to 2031 based upon assumptions concerning population growth, using 2007-based population forecasts and a market analysis based upon primary data collection. The model also relied upon proprietary data sourced from Experian for a range of variables including turnover per square metre and measures of under/over trading and the results of a bespoke market survey to establish consumer attitudes to shopping in Epping Forest District as compared with alternatives outside the local authority area.

3.1 Town Centre Study (2010) Model Update

As part of this review to inform the emerging Local Plan, a first step was to recreate the model utilised in the Town Centre study and replicate the original results of the model originally reported in 2010. The original model identifies the following additional need to 2031:

Once re-created, two of key elements were updated to reflect the current (2015/16) position: population and internet trading (built into a variable termed ‘special forms of trading’ or SFT).

Table 4: Town Centre Study (2010) Additional Retail Floorspace Need - 2009-2031

	Additional Retail Floorspace based on a constant market share 2009-2031	Additional Retail Floorspace based on an increased market share 2009 – 2031	Difference between a constant market share and an increased market share 2009-2031
Gross Comparison Floorspace (sq.m.)	25,648	38,098	+12,450
Gross Convenience Floorspace (sq.m.)	8,981	14,645	+5,664
Gross Total A1 (sq.m.)	34,629	52,743	+18,114
Gross Total A1-A5 Floorspace (sq.m)	43,042[11]	62,300	+19,258

3.1.1 Population

The level of population growth anticipated over the Plan period (up to 2033) effectively drives many aspects of the modelling, and relies on multiplying population by per capita expenditure assumptions across a variety of goods/services (with adjustment factors). The original model relied upon 2007 sub-national population forecasts available to the modelling team at the time. Therefore a recalibration of the zone populations based on actual results from the 2011 Census of Population (whose results also post-dated the original study) was included. For future years (post-2011), the population projections were updated from Office of National Statistics (ONS) 2012-based sub-national population projections. This data was used in order to align with the 2015 Strategic Housing Market Assessment, which uses the same data to inform the housing and economic needs of the District over the plan period. .

Population was, as in the Town Centre Study (TCS), modelled based on defining a series of zones reflecting shopping area catchments. These catchments were based on the combination of postcodes and allied with particular local authority administrative areas (although they are synonymous with a local authority boundaries as certain zones cover partial areas of local authorities). Table 5 shows the postcode definitions and associated local authorities and Figure 1 shows the zones in a mapped form.

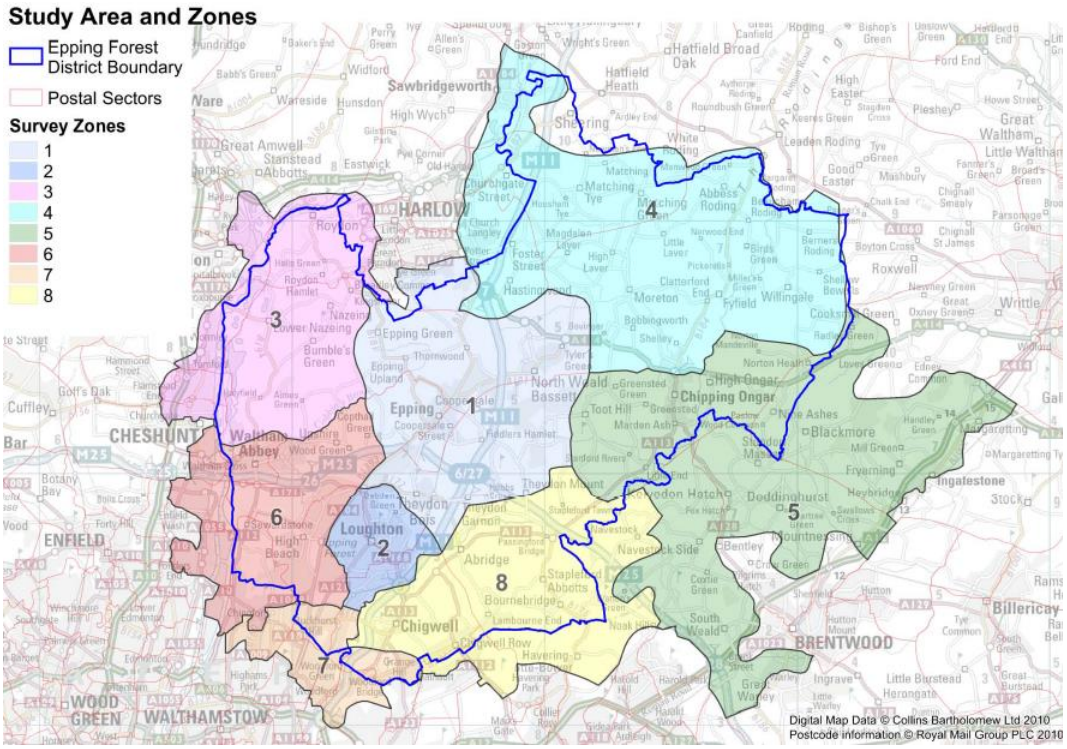
Figure 1 does, however, show that a postcode defined geography does not always respect specific local authority boundaries, Rather, postcodes serves to illustrate the functional relationships between populations and where they are likely to shop. The ‘blue’ line superimposed onto Figure 1 illustrates the relationship of the District to the zonal geography. This definition of the functional relationships also assists in defining potential sources of inflow into Epping Forest District from outside the local authority boundary.

[11] Based on calculations undertaking using information provided in the Town Centre Study (2010)

Table 5: Catchment Zones

Study Zone	Postcode Sectors	Local Authorities
1	CM16 4, CM16 5, CM16 6, CM16 7, CM18 7	Epping Forest, Harlow
2	IG10 3, IG10 2, IG10 1	Epping Forest
3	EN11 0, EN10 6, EN8 0, EN9 2, CM19 5, EN8 9	Broxbourne, East Hertfordshire, Epping Forest, Harlow
4	CM17 0, CM5 0, CM21 9, CM17 9	East Hertfordshire, Epping Forest, Harlow, Uttlesford
5	CM4 0, CM15 0, CM14 5, CM5 9	Brentwood, Chelmsford, Epping Forest, Havering
6	E4 7, EN9 1, EN3 6, EN3 7, EN8 7, EN9 3, IG10 4	Enfield, Epping Forest, Waltham Forest, Broxbourne
7	E4 6, IG7 5, IG8 8, IG8 0, IG9 5, IG9 6, IG8 7	Epping Forest, Redbridge, Waltham Forest
8	IG7 6, RM4 1, IG7 4	Epping Forest, Redbridge, Waltham Forest

Figure 1: TCS Study Area Boundaries



The result of applying 2012 based population forecasts to these zones is shown in Table 6. The basic assumption is that zonal population's growth rates mirror the average growth rate of the local authority areas to which they are most closely related.

Table 6: Revised population assumptions based on uplifting zone populations based on population growth rates in host LADs for zone

	2009	2011	2016	2021	2026	2031	2033*
Zone 1	33,240	33,662	35,	37,108	38,896	40,586	41,253
Zone 2	26,419	26,753	28,124	29,602	31,144	32,622	33,200
Zone 3	47,305	47,877	50,222	52,676	55,140	57,441	58,325
Zone 4	32,822	33,228	35,142	37,095	39,017	40,767	41,431
Zone 5	27,328	27,799	29,099	30,578	32,104	33,588	34,171
Zone 6	70,632	71,594	75,769	80,170	84,228	87,970	89,407
Zone 7	63,310	64,328	68,626	73,118	77,213	80,980	82,419
Zone 8	15,823	16,055	17,128	18,249	19,271	20,211	20,570
Total	316,880	321,296	339,446	358,596	377,013	394,165	400,776

The original TCS included an analysis of where consumers preferred to shop based on market research survey data. The assumptions derived from this data remain unchanged from the original modelling work. It is, however, noted that since the original TCS, other centres have emerged and improved their offer which may affect the relative attractiveness of Epping Forest District as a retail destination for both residents and outsiders.

3.1.2 Internet Trading

A greater level of internet trading for comparison and convenience goods than that assumed in the 2010 Town Centre Study has been observed in reported consumer expenditure for 2016. As a result, an adjustment was made to the original modelling assumptions concerning the expenditure diverted towards internet based purchases (referred to as 'Special Forms of Trading' or SFT in the 2010 TCS) where any increase in internet purchasing results in a lower level of expenditure deemed to be taking place in local centres. Accordingly, the SFT proportion for comparison retail, which indicates the proportion of internet based trading, was increased by 2.9 percentage points representing the difference between the original modelling assumptions and the actual position recorded in ONS data on internet related trading activity in 2016. The SFT proportion for convenience retail was increased by 2.0 percentage points on the same basis.

3.1.3 Retail Need

In line with the original Town Centre Study, two scenarios have been worked through: the first based on replicating the existing situation where Epping Forest District's relative attractiveness remains constant known as the 'constant market share' scenario; and the second based around Epping Forest District capturing a greater share of the expenditure derived from population growth known as the 'increased market share' scenario. This scenario was based on a 'policy on' approach of front loading new retail capacity to capture expenditure growth leading to an increase in market share thereby reducing expenditure leakage. The results of the updated additional retail need forecast analysis are shown in Table 7.

Table 7: The effect of forecast population growth on retail floorspace need 2009 – 2033

	Additional Retail Floorspace based on a constant market share 2009-2033	Additional Retail Floorspace based on an increased market share 2009 – 2033	Difference between a constant market share and an increased market share 2009-2033
Gross Comparison Floorspace (sq.m.)	34,617	48,391	+13,774
Gross Convenience Floorspace (sq.m.)	15,200	21,866	+6,666
Gross Total A1 (sq.m.)	49,817	70,257	+20,440
Gross Floorspace for A2-A5 (sq.m.)[12]	9,870	11,247	+1,377
Gross Total A1-A5 Floorspace (sq.m.)	59,687	81,504	+21,817

Under the 'constant market share' scenario, the results suggest a need for an additional 34,617 sq.m. of comparison shopping by 2033. A further 15,200 sq.m. of space are required for convenience shopping by 2033. This leads to a total of 49,817 sq.m. of retail (A1) floorspace. Also, an additional 9,870 sq.m. of floorspace is required for other A class uses.

Under the 'increased market share' scenario, the results suggest a need for an additional 48,391 sq.m. of comparison shopping by 2033. A further 21,866 sq.m. of floorspace are required for convenience shopping by 2033. This leads to a total of 70,257 sq.m. of retail (A1) space. An additional 11,247 sq.m. of floorspace is required for other A class uses. The 'increased market share' scenario produces more floorspace but cannot address the basic issue of whether Epping Forest District's centres could sustain an increased market share given changes in their relative attractiveness and problems with finding appropriate sites for a specific scale of development.

The relatively low level of uplift for comparison shopping is attributable to the high levels of leakage of expenditure outside Epping Forest District to locations such as Harlow which provide a greater diversity of shopping alternatives.

The expenditure analysis suggests a greater need for retail space provision in Epping Forest District, which would be expected given the relationship between more people and expenditure power. These results leave as a constant the amount of retail expenditure 'claimed' by new retail floorspace identified in the planning pipeline. However, further 'claims' can also be offset against the floorspace requirements identified by the model such as Langston Road and the proposed St. John's redevelopment (Section 3.3).

[12] This calculation applies the original assumption used in the TCS that A1 service/ A2 uses would constitute 10% of the gross total comparison shopping floorspace requirement. Due to data availability restrictions, use classes A3 – A5 are based upon an extrapolation of former model findings using residual expenditure from 2016 to 2031 and productivity per sq.m.

3.1.4 A Class Uses Need

The original model produced by Roger Tym and Partners in 2010 concluded that there was a need for an additional 62,300 sq.m. A1 to A5 space (based on an increased market share) (see Table 4). The refresh of this model which, as set out in Table 7, involved using the latest population forecasts taken to 2033 and updating assumptions concerning internet usage (reflecting the greater take up than anticipated). The model suggests a revised level of an additional 81,504 sq.m A1 to A5 space above existing by 2033 based on the same increased market share assumption used by Roger Tym & Partners (see Table 7). An additional, 59,687 s.q.m. of A1 to A5 floorspace above existing by 2033 is suggested based on Epping Forest District centres retaining their existing market share of retail expenditure.

The refresh assumes that the competitive pressures from outside the Epping Forest District remain unchanged from consumer research supporting the original modelling work in 2010 as this was outside of the scope of this study. However, it must be acknowledged that competition from newly opened centres such as Westfield and improvements to other centres which has become available after the original work will undoubtedly have had an effect on the leakage of comparison goods expenditure from Epping Forest District to the wider sub-region and would be likely to reduce the demand for additional retail floorspace for comparison shopping.

3.2 Hardisty Jones Employment-based Forecast

A further test of future retail need can be established by reviewing the likely need for floorspace associated with future employment. Hardisty Jones (2015) reported on wider employment needs in Epping Forest District, including Town Centre activities. Their work took as its starting position the economic forecasts from an East of England econometric model including projections to 2031 on employment (extrapolation techniques were used to extend the forecasts to 2033). These East of England employment forecasts were then apportioned out to individual local authority areas including Epping Forest District, with individual sector employment being assigned to represent specific use classes.

Following assignment it became possible to apply employment density assumptions to generate future floorspace requirements by use class and apply plot ratios to generate a land equivalent. As employment forecasts for the retail sector suggest a reduction in employment levels, the floorspace growth shows as negative which realistically translates into no additional provision over the plan period.

The work did however show a need for additional space to support A3-A5 use classes and A2 professional services space. This work suggested a total need over the plan period of an additional 12,600 sq.m. of floorspace consisting of 9,900 sq.m. of A3-A5 and 2,700 sq.m. of A2 (on top of existing provision). With regard to the retail sector, the Hardisty Jones report acknowledged that its findings were at a variance with the TCS expenditure model based findings. The Hardisty Jones findings are however similar to the proposed requirements for other A use classes.

An assessment of trends in employment between 2009 and 2014 across most of the District's centre was undertaken, while acknowledging the increasing sampling error associated with looking at BRES data at a much localised level. This assessment showed employment[13] in selected sectors associated with Town Centres (retail, catering, etc.[14]) indexed against 2009. This analysis shows that employment recovered to either the position held immediately prior to recession or beyond in all centres except Loughton High Road and Chipping Ongar. The analysis also shows a high rate of employment growth in Loughton Broadway.

Table 8: Index of employment change 2009 to 2014[15]

Year	Loughton Broadway	Buckhurst Hill Centre	Chipping Ongar Centre	Epping	Loughton	Waltham Abbey Centre
2009	100	100	100	100	100	100
2010	104	109	101	92	81	126
2011	103	113	90	115	83	122
2012	126	114	86	105	89	118
2013	146	121	97	110	86	126
2014	146	121	97	110	86	126

3.3 Pipeline Supply

There are currently two major developments in Epping Forest District, which will provide a significant increase in retail provision and contribute to meeting the retail need set out in the scenarios outlined above.

In July 2012, planning permission was granted for a new retail park at Langston Road, Loughton and construction has commenced on the development which is due to open in late 2016. The project will see the development of 16,435 sq.m. (GIA) of predominately retail (A1) floor space, (with a limit of up to 1,000 sq.m. (GIA) of restaurant/café (A3) floorspace and up to 1,000 sq.m. of food retailing (A1) floor space), landscaping, car parking, ground remodelling works, retaining wall structures and two accesses off Langston Road[16]. The scale of this development, warrants consideration of an 'out of centre' designation in the Draft Local Plan.

Development at the St John's Road Opportunity Area in Epping is also proposed, in particular on the site of the former St John's Primary School. A report to Essex

[13] Employment is a specific term used in the Business Response and Employment Survey (BRES) referring to employees in employment and sole traders/ partners.
[14] 47 : Retail trade, except of motor vehicles and motorcycles; 56 : Food and beverage service activities; 64 : Financial service activities, except insurance and pension funding; 65 : Insurance, reinsurance and pension funding, except compulsory social security; 66 : Activities auxiliary to financial services and insurance activities; 69 : Legal and accounting activities; 79 : Travel agency, tour operator and other reservation service and related activities
[15] Business Register Employment Survey - BRES is the definitive source of official employee statistics and can be used to derive employment estimates at varying industrial and geographical levels.
[16] Planning application reference EPF/2580/10

County Council Cabinet (July 2016) indicates that Epping Forest District Council's preferred development offer for this site is from Frontier Developments, which proposes approximately 3,250 sq. m. of retail space, including a flagship convenience retail store, a cinema and hotel. This proposal also provides 35 residential units and provision of 200 car parking spaces in a multi-storey car park. The indicative programme for development at the site is four years, comprised of 12 months for acquisition and planning application(s), 12 months planning approval and 18-24 months on site construction.

In addition, a number of smaller scale retail developments have been granted planning permission since the Town Centre Study (2010) was published. Of particular note are: Fyfield Business Park (Chipping Ongar) which received consent in 2015 for mixed-use residential led development, to include 140sq.m. of new retail space; and the former Winston Churchill pub site (Loughton Broadway), which has permission for three units of A1-A3 Class Uses at ground floor level along the Broadway.

It is the Council's aspiration to enable retail growth in and around the existing centres in the District. This development reflects this vision and provides significant increased retail and related uses for the District. Between the St John's Opportunity Area and Langston Road developments, there is approximately 20,000 sq.m. of additional main Town Centre uses in Epping Forest District, which is an approximately 20% increase on existing provision[17] (12.3% of total recorded stock for Epping Forest District in 2012), and which accounts for approximately one third of the projected retail and associated uses need identified in the revised model (see Table 7 – Constant Market Share scenario) looking at requirements up to 2033.

3.4 Options for Future Retail Provision

Over the Plan period, the way people access services and procure goods is likely to change in response to changing levels of prosperity, accessibility and technical innovation. Therefore, the role of Epping Forest District's centres is likely to change in ways that are hard to predict at the current time. These changes are, however, likely to further loosen the automatic policy response that more household growth necessarily translates into a need for more shopping and service floorspace. This is never more so the case than in Epping Forest District, with its physical proximity to major shopping destinations such as Westfield, Harlow and Romford alongside its virtual proximity to a whole national network of service/ fulfilment centres based around the strategic transport network that comes through an increased use of the internet.

The Council has to be mindful of the potential for damaging the health of its centres through an over provision of new floorspace notionally justified on the grounds of additional housing/population growth, and which could undermine the competitive position of existing traders faced with an already difficult trading environment. The Council also has to consider the problems of under providing for growth which could induce unnecessary shopping/other journeys on the

[17] Based on the total floorspace recorded for the centres in Roger Tym and Partners (2010) Town Centre Study - Table 8.16 Quantitative Need compared to Existing Position

transport network and diminish the attractiveness of its centres. Therefore, a balance is required between policies that protect the role of its existing network of centres whilst allowing sufficient policy flexibility for innovation in the future mix of uses including provision for a realistic level of localised growth. The matter of balance extends to the degree to which uses that attract a high volumes of footfall such as shops are sustained to the wider benefit of other uses (e.g. coffee shops or hairdressers) compared to uses that attract a focused visit to a centre e.g. an accounting practice.

A critical issue, therefore, is accounting for a realistic level of localised growth in retail floorspace to support centres over the Plan period. It is relevant to consider also that the Valuation Office[18] recorded 159,000 sq.m. of existing retail space in Epping Forest District in 2010. Across the six main centres only, total existing Town Centre floorspace is approximately 99,500 sq.m.[19].

The evidence base currently provides support to two contrasting positions:

- The first position relates to the impact future population will have on consumer expenditure (based on extrapolation of the Town Centre Study (2010) methodology). The updated model (see Table 7) concluded that there might be need for an additional 81,504 sq.m. of A1 to A5 floorspace by 2033 by building floorspace early in the Plan period in the hope of capturing retail expenditure that would otherwise leak to other areas leading to an increase in overall market share taken by centres in Epping Forest District. A more conservative approach assumes Epping Forest District holds onto its existing market share (based on the consumer market survey conducted in 2009 to support the TCS) which results in a forecast need for 59,687 sq.m. of floorspace over the Plan period.
- The second position offered in relation to the need for centres comes through employment focused work under taken by Hardisty Jones in 2015 in support of planning policies to support employment in the round (i.e. the whole range of employment supporting use classes not just those in Town Centres). This work suggested a total need over the plan period of 12,600 sq.m. of A1-A5 floorspace (with no A1 floorspace needed at all in the mix).

The risks associated with the expenditure model is that it could potentially lead to an oversupply of land leading to a displacement of other more pressing uses from a scarce supply of development land and require consideration of ‘out of town’ sites due to the absence of appropriate development opportunities within most of Epping Forest District’s centres. Reasonable doubt exists over whether the expenditure model can adequately account for current consumer preferences for purchasing comparison goods from outside the local authority area. This factor also casts doubt on the use of forecasts based on an ’increased market share’ which was justified on the idea that expenditure leakage into surrounding areas could be plugged through frontloading floorspace provision.

[18] Based on the Valuation Office Experimental Data set 2010 https://www.gov.uk/government/statistics/business-floorspace-experimental-statistics
[19] Roger Tym and Partners (2010) Town Centre Study - Table 8.16 Quantitative Need compared to Existing Position

The risk associated with the employment model is that it could potentially lead to an under provision of land for convenience shopping needs given that an expanded local population is much more likely to do 'top up' shopping from within the local authority area rather than travel further afield. The employment model does not differentiate between convenience and comparison shopping. The potential risk is that demand is displaced onto the transport network generating additional shopping based trips.

The development of alternative shopping destinations outside Epping Forest District combined with the greater use of the internet for making purchases since the TCS (2010) makes the prospect of centre's increasing their market share of overall retail expenditure unrealistic. Basing retail needs upon an unrealistic set of assumptions risks creating an additional supply that undermines the viability of existing operators and consumes scarce land resources. Given the risks identified with the enhanced market share scenario, the alternative scenario used within the TCS (2010) based on Epping Forest District retaining its existing market share of retail expenditure seems to provide a more robust basis for assessing future retail need. Under the constant market share scenario, a further 59,687 sq.m. of floorspace would be required on top of existing provision in the District. It should be noted however that even the constant market share approach makes assumptions concerning the relative attractiveness of Epping Forest District centres and their ability to capture retail expenditure. The original assumptions founded on a survey of consumer behaviour seven years ago may be presenting an overly optimistic picture of whether centres can hold onto the expenditure predicted under the constant market share scenario.

Of the 59,687 sq.m. of floorspace forecast by the model update, 20,000 sq.m. of floorspace is effectively 'claimed' by the pipeline projects discussed in Section 3.3[20]. A net additional floorspace requirement, therefore, remains of 39,687 sq.m. If this is distributed across the town centre A1 to A5 Class uses in accordance with the 2010 model, the requirement for different uses is as shown in Table 9:

Table 9: Floorspace Requirements[21]

Use Class	Sq.m.
Comparison (A1)	23,017
Convenience (A1)	10,107
A2-A5	6,563
Total	39,687

A key issue for local plan-making purposes is the specific location of this growth within Epping Forest District and its likely impact on site allocations over the Plan period. Given a continued need for 'top up' convenience shopping and access to services like takeaways and coffee shops, proximity to population is

[20] The term 'claimed' refers to Step 6: 'Claims' on Growth in Retained Expenditure in the Town Centres Study in the model methodology described by Roger Tym and Partners (2010)
[21] This is based on deducting the pipeline floorspace (20,000 sq.m.) from the total predicted under the constant market share and assuming the difference has the same distribution as suggested by the model between comparison, convenience and A2-A5 uses.

going to be the most likely driver of new provision of these services. The relationship with the location of housing is more transparent in these cases.

Separate to this report, a Site Selection Report has been developed which sets out ambitions for housing and employment growth in Epping Forest District. Table 10 allocates the modelled A Class uses floorspace need across the settlements identified for housing growth in the Site Selection Report, in proportion to that settlement's share of growth. For comparison shopping and professional services (A2 class uses), floorspace is then consolidated into the nearest centre recognised under the proposed settlement hierarchy, and Harlow (recognising the relationship between the strategic allocations and Harlow). For convenience shopping and food/ drink (A2-A5) the same approach to initial distribution has been undertaken followed by consolidation of any allocation under 150 sq.m. to the nearest centre recognised under the proposed settlement hierarchy. This recognises the need for a closer spatial relationship between provision and housing growth and where larger concentrations of housing provision are to be made.

Table 10: Provision of Convenience and A3-A5 Floorspace Provision[22]

Centre Name	Comparison (A1) sq.m.	Convenience (A1) sq.m.	A2 Use Classes (sq.m.)	A3-A5 Classes (sq.m.)
Buckhurst Hill	1,089	80	109	34
Chipping Ongar	1,252	550	125	232
Loughton/Debden	2,482	1,090	248	459
Epping	7,327	1,613	733	680
Waltham Abbey	1,667	732	167	309
Harlow	9,201	4,040	920	1,703
Chigwell	0	398	0	168
North Weald Bassett	0	1,271	0	536
Theydon Bois	0	333	0	140
TOTAL	**23,017**	**10,107**	**2,302**	**4,261**

The largest allocation of convenience floorspace (4,065 sq.m.) falls across the six main retail centre – Buckhurst Hill, Chipping Ongar, Loughton/Debden, Epping and Waltham Abbey. Table 10 also includes Harlow as a settlement given the proximity of Harlow as a destination shopping centre for people resident in the strategic allocations and surrounding villages which represent 36.3%[23] of the total housing allocations (4,040 sq.m.). The next largest allocation of floorspace, for North Weald Bassett (1,271 sq.m. of A1 convenience floorspace and 536 sq.m. of A3-A5 floorspace) would be dealt with in the context of the master plan for this

[22] Note: For comparison goods and A2 floorspace has been consolidated on the following basis:
- Buckhurst Hill: Buckhurst Hill and Chigwell
- Chipping Ongar: Chipping Ongar, Fyfield and High Ongar
- Epping Town: Epping Town, Stapleford Abbotts, Theydon Bois, Thornwood, Coopersale and North Weald Bassett
- Harlow: Nazeing, Lower Sheering, Roydon, Sheering and the strategic allocations of West Sumners, East of Harlow, Latton Priory, Riddings Lane and West Katherines

[23] Based on housing growth less commitments, completions and windfall

settlement. Theydon Bois and Chigwell also show a small requirement for A1 convenience floorspace of 333 sq.m. and 398 sq.m. respectively.

Comparison shopping need also arises under the constant market scenario of a total of 23,017 sq.m. of floorspace. The relationship of comparison shopping floorspace with the location of housing is likely to be less straight forward as people are generally more willing to travel for the purchase of comparison goods or use the internet to make purchases. There is, therefore, likely to be a much greater propensity for people to travel to major retail destinations outside Epping Forest District.

Table 10 also shows the distribution of comparison floorspace[24] across the centres considered in this Report, and again includes Harlow. It is also assumed that professional service users with use class A2 will similarly concentrate within the main centres. The distribution reflects the allocation of housing growth followed by a process of consolidating floorspace to nearest centre[25] within the proposed hierarchy for those settlements that are not designated as retail centres in their own right.

This distribution of floorspace is still however subject to the same assumptions concerning the relative attractiveness of Epping Forest District's centre as surveyed in 2009. Further analysis of market share may also identify that part of this additional demand may be met by other centres outside of Epping Forest District and Harlow. A key consideration for the emerging Local Plan will be to avoid provision for comparison shopping that may never be taken up because of structural changes in the spatial distribution of demand and more innovative uses of existing floorspace (i.e. better space productivity). It is therefore proposed to monitor take up of the existing pipeline consents and review the need for new sites at a later date in the light of any subsequent survey findings concerning the ability of Epping Forest District's ability to retain the retail expenditure of its residents.

In considering the need for new retail provision in the District, the Council should also think about the balance between the desire to conserve the current role and purpose of centres and the ability to innovate new roles/purposes. A critical consideration is the degree to which the market is allowed to the lead the process of change. Analysis of the change in use classes with centres (see Appendix A) suggests that the presence of shops within high street frontages has been diluted in centres to a greater or lesser degree. Broadly, Epping and Loughton High Road have experienced the smallest amount of dilution, however some of the smaller centres now have less than 50% of the their primary frontage devoted to shopping. Some of the transition has been to food and drink uses representative of the expected trajectory for future Town Centres described by Mary Portas. These changes do nevertheless have implications for the way visitors use centres by changing visual appearance or opening hours. To date the market has driven these changes towards less shopping and more other uses. Some of these other uses are wholly complementary to the future vision mapped out by the Portas review such as the greater role played by cafes in attracting and retaining users of town

[24] After allowance for commitments/ completions/ windfalls
[25] Based on using google maps and taking the route with the least kilometres shown

centres. The Council must consider whether it wishes to stabilise the loss of retail or aspire to a return towards more retail.

Section 3.3 suggests that the new retail park at Langston Road warrants consideration as an 'out of centre' designation in the Draft Local Plan. Given this site is under construction this is an appropriate policy consideration. However, the need for other out of centre retail sites should be further reviewed in light of the findings of the market share analysis, noting that a move to this form of retailing, could result in a permanent decline in the viability of existing centres. This analysis may also result in the need to identify some edge of centre locations for town centre uses.

3.5 Retail Frontage

Currently, Policy TC4 applies a blanket policy that non-retail frontages should not exceed 30% of Key Frontages in centres. Epping Forest District Council monitoring does however show that this policy has effectively been breached by changes that have taken place since the Local Plan (1998) and Alterations (2006) was adopted with the exception of Loughton Broadway. All centres now have higher level of non-retail frontages within their composition within key frontages. It is likely that some element of this transition has been enabled by the fact that changes can occur without necessarily breaking the second component of Policy TC4 that not more than two non-retail uses can be adjacent to one another (referred to 'adjacency' in the text). As more non retail uses penetrate the frontages, however, the likelihood of adjacency must increasingly act as a break on further expansion of non-retail incursion.

In light of this change, where to set the correct proportion of retail and the degree to which adjacency acts as a natural brake on the further erosion of retail uses in frontages requires consideration. Setting the proportion of retail, based upon the current frontage composition, effectively signals an acceptance of the market position in that centre. It does, however, treat the current retail/non-retail mix as a desirable end point for the centre in question. A risk is that observable trends in the loss of retail continue beyond the current position such that future retail failures result in extended periods of vacancy as appropriate policy compliant occupiers (other retailers) cannot be found.

On the other hand, setting a retail proportion in excess of the current market position may help signal an aspiration to maintain a role and be interpreted as signalling a desire to encourage more retailing in the centre concerned. However, this would also create an effective barrier to market trends and encourage extended vacancy durations in units who are unable to secure permission to transform into another use.

A 'do nothing' strategy risks encouraging a transformation process which may result in a centre ceasing to play a recognisable role as a centre (at least in policy terms) as the proportion of non-retail uses rises to a point where a tipping point is reached making a centre into something else e.g. a residential area or a food and drink speciality quarter.

The options are therefore as follows:

1. Plan for no specific proportion of retail but retain an adjacency criteria based policy (as in the second part of the current Local Plan (1998) and Alterations (2006) policy TC4) preventing development resulting in more than two adjacent non-retail frontages irrespective of frontage length on the basis that will become a self-limiter as the proportion of non-retail uses grows in any frontage;
2. Plan for a proportion of retail, based on the current proportion observable in Key and non-Key Frontages based on treating the current position as a sustainable position for centre concerned and including an adjacency criteria;
3. Plan for a proportion of retail based upon an aspiration to conserve the functional role for centres and encourage retail uses to come back to centres and including an adjacency criteria.

3.6 Smaller-scale Centres

A further issue concerns the provision of retail outside the top three tiers of the hierarchy. Section 3.4 has identified the potential for convenience and A3-A5 Class uses to support need arising from housing growth. Some of this need may be extremely localised. It is also recognised that new needs can emerge outside the centre hierarchy e.g. Langston Road and in a large number of very small centres. In terms of the very small centres, these are currently covered within a fourth tier within Policy TC1 in the Local Plan (1998) and Alterations (2006). This tier covers small scale retail provision often consisting of a few local shop units or a parade. These centres essentially address a localised need for 'top up' type shopping requirements of the convenience variety such as small supermarkets, sub post offices, pharmacy, newsagents or a multi-functional store that combines two or more functions. In addition, such centres may include takeaways.

The options are:

- Adopt a place specific policy approach to these centres by positioning existing centres within a new centre hierarchy policy including the creation of a third tier covering specific local centres.
- Adopt a criteria based approach offering protection for retail activities and the ability to undertake small scale expansions and adaptations in local centres but without a formalised status in policy.

A place specific policy has the advantages of providing a specific recognition for the role played by small centres. However the risks of this approach concern a potential lack of future flexibility associated with the potential need to define boundaries and the potential for new centres to emerge possible associated with future growth. These risks could be mitigated by using notations to indicate centres without formalising boundaries. The place specific policy also poses risks in relation to the existing hierarchy as the Langston Road development is sufficiently large to warrant the status of being the largest 'Small District Centre' of a reconstituted grouping of five centres consistent with that definition.

A criteria based policy offering protection to retail uses across all local centres outside those specifically identified in Draft policy offers a level of flexibility to cover future needs.

4 Suggestions for Town Centres

The purpose of this Town Centre review has been to inform the approach to Town Centres in the emerging Local Plan. The baseline and forecasting established and set out in the preceding chapters informed a comprehensive assessment of each Principal, Smaller and District Centre (as allocated in the Local Plan (1998) and Alterations (2006), in order to identify requirements to feed into policy within the emerging Local Plan.

4.1 Requirements of the National Planning Policy Framework (NPPF)

The new Local Plan is required to comply with the NPPF. Within Section 2, Paragraph 23, The National Planning Policy Framework states the following requirements in relation to 'ensuring the vitality of Town Centres':

- recognise Town Centres as the heart of their communities and pursue policies to support their viability and vitality;
- define a network and hierarchy of centres that is resilient to anticipated future economic changes;
- define the extent of Town Centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations;
- promote competitive Town Centres that provide customer choice and a diverse retail offer and which reflect the individuality of Town Centres;
- retain and enhance existing markets and, where appropriate, re-introduce or create new ones, ensuring that markets remain attractive and competitive;
- allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in Town Centres. It is important that needs for retail, leisure, office and other main Town Centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand Town Centres to ensure a sufficient supply of suitable sites;
- allocate appropriate edge of centre sites for main Town Centre uses that are well connected to the Town Centre where suitable and viable Town Centre sites are not available. If sufficient edge of centre sites cannot be identified, set policies for meeting the identified needs in other accessible locations that are well connected to the Town Centre;
- set policies for the consideration of proposals for main Town Centre uses which cannot be accommodated in or adjacent to Town Centres;
- recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites; and

- where Town Centres are in decline, local planning authorities should plan positively for their future to encourage economic activity.

A key driver in undertaking the current review has been to establish the degree to which current policies articulated in the Local Plan (1998) and Alterations (2006) meets the requirements of the NPPF. Each component of the NPPF relating to Town Centres has therefore been compared with the existing Local Plan (1998) and Alterations (2006) to identify areas where NPPF requirements are not being met or where there are needs for validation. This review is summarised below:

NPPF Requirement	Extant Local Plan (1998) and Alterations (2006)
Allocate a range of suitable sites to meet the scale and type of retail needed in Town Centres. It is important that needs for retail, leisure, office and other main Town Centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand Town Centres to ensure a sufficient supply of suitable sites.	The preparation of the Local Plan (1998) and Alterations (2006) was based on a consideration of retail need that could not of account for the significant changes took place as a result of the 2008 recession and the subsequent policy of austerity. In updating the baseline for the emerging Local Plan, two evidence based studies have been undertaken to determine retail need. Hardisty Jones (2015) Economic and Employment Evidence to Support the Local Plan and Economic Development Strategy and an earlier study undertaken by Roger Tym and Partners (2010) Town Centre Study. Details of these are set out in Section 4 of this Report.
Recognise Town Centres as the heart of their communities and pursue policies to support their viability and vitality.	The Local Plan (1998) and Alterations (2006) contains a suite of policies concerned with supporting Town Centres signifying a longstanding recognition by the Council that centres are a key area for local planning policy.
Define a network and hierarchy of centres that is resilient to anticipated future economic changes.	The extant Local Plan (1998) and Alterations (2006) contains a hierarchy of centres based on the definition contained in Policy TC1 which defines centres based on 'principal' centres at the top of the hierarchy (Epping, Loughton High Road, Waltham Abbey) followed by 'smaller' centres (Loughton Broadway, Chipping Ongar) and 'district' centres (Buckhurst Hill – Queen's Road (East) and 'local' (e.g. Buckhurst Hill – Loughton Way, Lower Queen's Road). This hierarchy was subsequently reviewed in 2010 into a simplified hierarchy based on Town Centres (Epping and Loughton High Road) and Small District Centres (Buckhurst Hill, Chipping Ongar, Waltham Abbey and Loughton Broadway). The recommendations were intended as evidence to support the development of a Local Development Framework however the simplified hierarchy were never formally translated into an adopted policy.
Define the extent of Town Centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations.	Town Centre Boundaries: The Local Plan (1998) and Alterations (2006) already identifies Town Centre boundaries based on alterations to the original 1998 Local Plan. Primary Shopping Areas The Local Plan (1998) and Alterations (2006) does not identify separate Primary Shopping Areas – these are

NPPF Requirement	Extant Local Plan (1998) and Alterations (2006)
	effectively subsumed into the Town Centre as defined by the Town Centre boundary. Primary frontages The Local Plan (1998) and Alterations (2006) identifies Key Frontages which align with policy TC4 where restrictions are placed on the proportion of non-retail uses at ground floor level (30%) and the allowance of more than two adjacent non-retail uses. Potentially these frontages could be reclassified as primary frontages. Secondary frontages The Local Plan (1998) and Alterations (2006) does not identify secondary frontages as such although the survey data collects non-Key Frontage data alongside Key Frontage data. A potential default position would be to regard all frontages not classified as primary as secondary.
Promote competitive Town Centres that provide customer choice and a diverse retail offer and which reflect the individuality of Town Centres.	Local Plan (1998) and Alterations (2006) policies TC1 to TC6 combine to address this requirement. Note, there is a street market in Epping, but no other formal markets in the District.
Retain and enhance existing markets and, where appropriate, re-introduce or create new ones, ensuring that markets remain attractive and competitive.	The Local Plan (1998) and Alterations (2006) has no specific provision relating to markets.
Allocate appropriate edge of centre sites for main Town Centre uses that are well connected to the Town Centre where suitable and viable Town Centre sites are not available. If sufficient edge of centre sites cannot be identified, set policies for meeting the identified needs in other accessible locations that are well connected to the Town Centre.	The 2010 Town Centre Study included the identification of opportunity sites in all centres except Chipping Ongar and Buckhurst Hill where no appropriate sites could be identified.
Set policies for the consideration of proposals for main Town Centre uses which cannot be accommodated in or adjacent to Town Centres.	The Local Plan (1998) and Alterations (2006) includes policy TC2 – Sequential Approach which sets out a criteria based approach to the consideration of proposals.
Recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites.	The Local Plan (1998) and Alterations (2006) includes policy TC3 – Town Centre Function which includes provision for "*residential accommodation in appropriate locations but not at ground floor level*". The same policy also enables the refusal of proposals that would prejudice the potential of upper floors as living or business accommodation
Where Town Centres are in decline, local planning authorities should plan positively for their future to encourage economic activity.	Policies TC1 to TC6 of the Local Plan (1998) and Alterations (2006) address this issue.

The comparison between the NPPF and the extant Local Plan (1998) and Alterations (2006) highlights the need to consider the following areas within the review and emerging Local Plan:

- the degree and extent to which the extant key frontages are a sufficient basis for being considered as a primary frontage (either whole or in part);
- the degree and extent of secondary frontage designation after allowing for primary frontage designation;
- whether the Town Centre boundaries are in need of adjustment in the light of changes to the configuration of Town Centre uses and whether there is a basis for defining primary shopping areas;
- whether there is a need for a general policy covering the provision of markets in centres or a centre specific policy; and
- whether the review of frontages, site opportunities and growth confirm a specific position in the centres' hierarchy as recommended in the 2010 TCS relative to other centres or an alternative strategy.

In addition, as set out in Section 4 of this report, there is a need to assess whether more recent population growth forecasts require an adjustment to the quantity of floorspace required in the light of a more pervasive use of the internet for shopping purposes and whether additional floorspace requirements is of a magnitude where additional site provision is required/ feasible after allowing for existing opportunity sites coming forward and whether the cumulative impact of any additional provision creates a rationale for changing centre boundaries. Given the identified objective to promote more localised centres in Epping Forest District and the uncertainties around leakage to other centres, at this stage no recommendation is made on this point.

4.2 Suggested amendments to Town Centres

Based on the above list of considerations, each of the six Principal, Smaller and District Centres (as designated in the Local Plan (1998) and Alterations (2006) in Epping Forest District has been reviewed to establish if and how the existing policy or designation may require revision. It responds directly to the requirements set out in the NPPF, as discussed earlier in this section.

4.2.1 Primary Frontage

The NPPF defines a primary frontage as "*likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods*". The NPPF does not however include any quantifiable threshold.

The Local Plan 1998 Updated with Alterations 2006 defines the Town Centre boundaries and Key Frontages in which retailing is most concentrated in each centre. Policy TC4 places a restriction on the proportion of non-retail uses at ground floor level (30%) and the allowance of more than two adjacent non-retail uses (irrespective of frontage width). As Key Frontages were originally defined around a 70% retail frontage content and not more than two adjoining non-retail

uses[26], the notion of a Key Frontage is a reasonable basis for defining a primary frontage unless there has been a substantive change in circumstance since the original definition such as the penetration of more non-retail provision.

In this assessment, the Council's 2013-2016 monitoring data, based on periodic surveys, has been used to assess the current proportion of ground floor frontages occupied by activities other than retail (A1). As set out in Section 2.3.3 some inconsistencies were noted in the Council's survey data from 2013-2016. The review of the data included updates to reflect the 2016 position on number and use class of units in the Key Frontage and Non-Key Frontage in each centre. This was undertaken using GIS data and the findings of site visits in July 2016. This data is provided in Appendix B of this report.

A spatial assessment was then undertaken to determine whether other A class uses (not A1), and wider non-retail have clustered in particular parts of the current Key Frontages to an extent where the frontage has become fragmented.

4.2.2 Secondary Frontage

The NPPF defines a secondary frontage as providing greater opportunities for a diversity of uses such as restaurants, cinemas and businesses. The NPPF does not however include any quantifiable threshold. Former policy STC7 in the superseded 1998 Local Plan sought to limit non-retail frontages in non-Key Frontages to no more than 60%.

Despite the acceptance of a greater non-retail mix, Secondary Frontages have a relationship with the primary frontages. It is also possible that some frontages could be neither primary nor secondary because the retail component has become so diluted over time.

In this assessment, the Council's 2013-2016 monitoring data, with improvements set out in Section 4.2.1 above, has been used to assess the current proportion of ground floor non-Key Frontages (those frontages within the Centre boundary which are not designated as Key Frontages) occupied by activities other than retail (A1). This data is provided in Appendix B of this report.

A spatial assessment was then undertaken to determine whether the degree and extent of other A class uses (non A1) and wider non-retail warrant designation as a Secondary Frontage or whether a frontage has now become divorced from retailing activity rendering it unsuitable for designation.

4.2.3 Town Centre Boundaries and Primary Shopping Areas

The existing distribution of Town Centre activities and the provision of sites to accommodate growth combine to provide a reasonable baseline against which the existing centre boundaries can be assessed.

[26] Paragraph 11.49a of Local Plan 1998 Updated with Alterations 2006

Boundaries should be reviewed against the existing provision to determine the need for change and should encompass the primary and secondary frontages and include new development sites destined for Town Centre uses.

The NPPF defines a Primary Shopping Area as a "*defined area where retail development is concentrated (generally comprising the primary and those secondary frontages which are adjoining and closely related to the primary shopping frontage)*". Within Epping Forest District, given the relatively 'local' nature of centres, there is concern that without sufficient policy to protect Town Centre areas, there will be an erosion of the main Town Centre uses across the District, for example, coming from changes of uses allowed under the General Permitted Development (England) (Amendment) Order 2016.

Areas identified as Primary Shopping Areas might potentially be considered in the future for Article 4 Directions, which restrict Permitted Development rights, in order to promote vibrant and active Town and Small District Centres. The Council may wish to consider the use of Article 4 Directions to protect the Centre(s) within the District which are most vulnerable to change under permitted development, where the loss of A1 and A2 Class uses to residential is impacting the viability and vitality of Town Centres or in the case of settlements such as Waltham Abbey, where there this a high proportion of small units which are at risk of changes of use from retail.

4.2.4 Status in the Centres' Hierarchy

The final step involves determining whether the material changes identified in relation to future growth, frontages and site opportunities confirm a centre's relative position. This involves taking a view on the cumulative effect of changes and how a centre compares with a similar analysis of other centres.

A key issue is to confirm whether the recommendations contained in the 2010 Town Centre Study for a simplification of the centres hierarchy based on two Town Centres (Epping and Loughton High Road) and four Small District Centres (Loughton Broadway, Chipping Ongar, Buckhurst Hill, Waltham Abbey) within a revised policy are accepted.

Other retailing provision should be covered by a general policy towards retail parades. In addition general criteria based policy should be considered to cover 'markets', noting that the Council has an aspiration to promote markets associated with food production in the area around Nazeing.

4.3 Recommendations

The assessment outlined in section 4.2 has been applied to each of the centres considered in the original TCS. The suggested considerations for Town Centre policy in the emerging Local Plan are detailed in the following sub-sections. Table 11 overleaf provides a summary of the recommendations for policy.

Table 11: Summary of Town Centre Policy Recommendations

Primary Frontage	**Secondary Frontage**	**Town Centre Boundary and Primary Shopping Area**
Epping		
Existing Key Frontage should be retained as Primary Frontage, with the exception of units fronting onto Station Road, and those on the High Street to the west of Station Road. In addition, Primary Retail Frontage should include frontages adjacent to St John's Church. The proportion of retail (A1) within the Primary Frontage should be set at 70%.	Secondary Retail Frontage should be located in various locations, including: on the High Street to the west of St John's Road and Station Road, extending up to Crows Road and Clarks Lane; at the north-eastern end of the High Street; and along St John's Road. The proportion of retail (A1) within the Secondary Frontage should be set at 20%.	The existing Town Centre boundary should be retained. A Primary Shopping Area should be added which incorporates Primary Frontage, and in addition the area of Secondary Frontage at the north-eastern end of the High Street.
Loughton High Road		
Existing Key Frontage should be retained as Primary Frontage, with the exception of the former Brown's Car Show Room site. The proportion of retail (A1) within the Primary Frontage should be set at 70%.	The majority of those frontages within the Town Centre boundary that are not proposed for designation as Primary Retail Frontage should be Secondary Retail Frontage. The proportion of retail (A1) within the Secondary Frontage should be set at 35%.	The existing Town Centre boundary should be retained, with a minor alteration to include Loughton Social Club. A Primary Shopping Area should be added which covers all Primary Frontage, and in addition Secondary Frontage along Forest Road and units 104 to 117 High Road.
Buckhurst Hill		
Existing Key Frontage should be retained as Primary Frontage. The proportion of retail (A1) within the Primary Frontage should be set at 65%.	Those frontages within the District Centre boundary that are not proposed for designation as Primary Retail Frontage should be Secondary Retail Frontage, with the exception of the nursery school on King's Avenue. The proportion of retail (A1) within the Secondary Frontage should be set at 40%.	The existing District Centre boundary should be retained, with a minor alteration to include 86 Queen's Road. A Primary Shopping Area should be added which covers all Primary Frontage.

Chipping Ongar		
Existing Key Frontage should be retained as Primary Frontage. The proportion of retail (A1) within the Primary Frontage should be set at 50%.	The majority of those frontages within the District Centre boundary that are not proposed for designation as Primary Retail Frontage should be Secondary Retail Frontage. The proportion of retail (A1) within the Secondary Frontage should be set at 45%.	The existing District Centre boundary should be amended to the south to include the existing retail units currently designated as a Local Shopping Centre. A Primary Shopping Area should be added which covers all Primary Frontage, and in addition Secondary Frontage from 135 to 183 High Street.
Loughton Broadway		
Existing Key Frontage should be retained as Primary Frontage. In addition, all remaining units along the Broadway should be designated Primary Frontage. The proportion of retail (A1) within the Primary Frontage should be set at 60%.	Those frontages within the District Centre boundary that are not proposed for designation as Primary Retail Frontage should be Secondary Retail Frontage. Given the character of the proposed Secondary Frontage consisting currently of a sui generis use, no specific proportion is proposed for this frontage area.	The existing District Centre boundary should be retained, with a minor alteration to remove a small residential units behind the former Winston Churchill Public House site. A Primary Shopping Area should be added which covers all Primary Frontage.
Waltham Abbey		
Existing Key Frontage should be retained as Primary Frontage. In addition, all remaining units on the north side of Sun Street and Market Square should be designated Primary Frontage. The proportion of retail (A1) within the Primary Frontage should be set at 45%.	The majority of existing non-Key Frontage should be retained as Secondary Frontage. The proportion of retail (A1) within the Secondary Frontage should be set at 25%.	The existing Town Centre boundary should be amended to reduce its extent: removing the Tesco Superstore to the east, and a small cluster of non-retail uses to the west. A Primary Shopping Area should be added which covers all Primary Frontage.

4.3.1 Epping

Primary Frontage

Overall, the Key Frontage of Epping is currently composed of 71% retailing (A1 Class Use) and 29% non-retail[27] uses based on ground floor frontage length (see Appendix B.2). These figures compare with around 27% retailing (A1) in non-Key Frontages (see Appendix B.2).

These findings suggest that the existing Local Plan policies have supported a higher proportion of retail (A1) uses sufficient to differentiate the Key Frontage from other frontages, consistent with the 'high proportion' of retail (A1) uses required to align with the NPPF definition of Key Frontages. In Epping, the actual proportion of A1 retail within the Key Frontage is broadly consistent with the 70% retail uses required by TC4 in the Local Plan 1998 Updated with Alterations 2006.

Based on the review of existing Key Frontages, an assessment of the different options for designating Primary Frontage for Epping was undertaken. The options considered are set out below:

Option	Assessment
E1: Existing Key Frontage becomes Primary Frontage	Although there is some dilution of A1 Class Uses in the existing Key Frontage, the proportion of A1 remains high. A visual inspection of the distribution of activities within the centre doesn't show any clusters of non-retailing within the existing Key Frontage.
E2: Small consolidation of Primary Frontage, with existing Key Frontage along Station Road and on the High Street west of Station Road not becoming Primary Frontage.	As in option E1. Units which do not front onto the High Street would not be included within the Primary Frontage. These units currently have a high proportion of non-A1 Class Uses. A small cluster of existing Key Frontage units on the High Street to the west of Station Road have a high proportion of non-A1 Class Uses. These would not form part of the Primary Frontage.
E3: Extension of Primary Frontage up to St John's Church on the western side of the High Street	The non-Key Frontage adjacent to St John's Church shows little difference in the proportion of A1 Class Uses to the existing Key Frontage, and therefore its exclusion from the Primary Frontage appears illogical.
E4: Extension of the Primary Frontage to include non-Key Frontage at the north eastern end of the High Street	This cluster of retail units has a low proportion of A1 Class Uses, being primarily A2-A5 Class Uses. Site visits in July 2016 noted that this stretch of units includes multiple restaurants and a hotel.

It was therefore concluded that the preferred option for Epping would be to combine options E1 to E4 above. It is recommended that the existing Key Frontage is retained as Primary Frontage, with two exceptions. Firstly, the existing Key Frontage fronting onto Station Road and to the west of Station Road on the High Street would not be designated as Primary Frontage. Secondly, an

[27] For the purposes of this study, non-retail is defined as anything other than A1 Class Uses unless otherwise stated.

extension of the Primary Frontage to include the non-Key Frontage adjacent to St John's Church.

This designation would result in a Primary Frontage of 739 metres in length, 68% of which would be in retail (A1) use (1% different from the existing proportion in Key Frontage). The proportion of retail (A1) within the Primary Frontage should be set at 70% to protect the shopping function of this area.

Secondary Frontage

Based on 2015 survey results (see Section 3 and Appendix B for overview), the non-Key Frontages within Epping were composed of 27% retailing (A1) and 73% non-retail uses based on ground floor frontage lengths (see Appendix B.2).

While these findings suggest that there is a reasonable level of retail activity within non-Key Frontage lengths and that these frontages are complimentary to the Primary Frontages defined above, not all non-Key Frontage provides sufficient retail (or complementary) uses. A visual inspection of the distribution of activities within non-Key Frontages has identified some areas which justify inclusion within the Secondary Frontage. These areas are primarily to the west of St John's Road, extending up to Crows Road and Clarks Lane. This Secondary Frontage also includes the former Key Frontage areas along Station Road, which were not recommended to be part of the Primary Frontage (see above). In addition, the non-Key Frontage at the north-eastern end of the Town Centre is also recommended to become part of the Secondary Frontage, due to its high proportion of non-A1 Class Uses, but favourable position on the High Street.

None of the non-Key Frontage to the west of Crows Road or Clarks Lane is recommended for designation as Secondary Frontage, due to the high proportion of non-retail uses. Site visits from July 2016 also indicated that these areas had low footfall, and that the quality of retail offer in these areas was lower than the remainder of the High Street.

In addition, a provisional area of Secondary Frontage has been identified along St John's Road. This is predicated on development coming forward within the St John's Road Opportunity Area (see additional site provision below). At present, a Development Brief has been prepared for this area and a development partner is being procured, suggesting that substantial new retail development could take place (see Section 3.3 for more details).

This designation would result in a Secondary Frontage of 393 metres in length, 21% of which would be in retail (A1) use. These Secondary Retail Frontages should form the basis of a formal designation in the Local Plan, with minimum level of retail frontage being set at 20%.

Town Centre Boundary and Primary Shopping Area

Given the visual inspection of the distribution of Town Centre uses, stakeholder comments, and proposed Primary and Secondary Frontages, an assessment of the extent of the Centre boundary was undertaken. The options considered are set out below:

Option	Assessment
E5: Retain existing Town Centre boundary	The existing boundary covers the Primary and Secondary Frontages, as well as other key Town Centre uses such as car parks, services (e.g. Epping Library) and civic amenities such as the EFDC Offices.
E6: Reduce the boundary at the north eastern end, to no longer include the EFDC Offices and Buttercross Lane Car Park.	The area that would be excluded has been identified as a possible area for residential mixed-use development, and is therefore unlikely to contain an adequate proportion of Town Centre uses in the future. This would exclude the EDFC offices from the Town Centre. As the central offices of the District Council, they play a key civic function and it may be unsuitable for them to be outside of the Town Centre boundary.

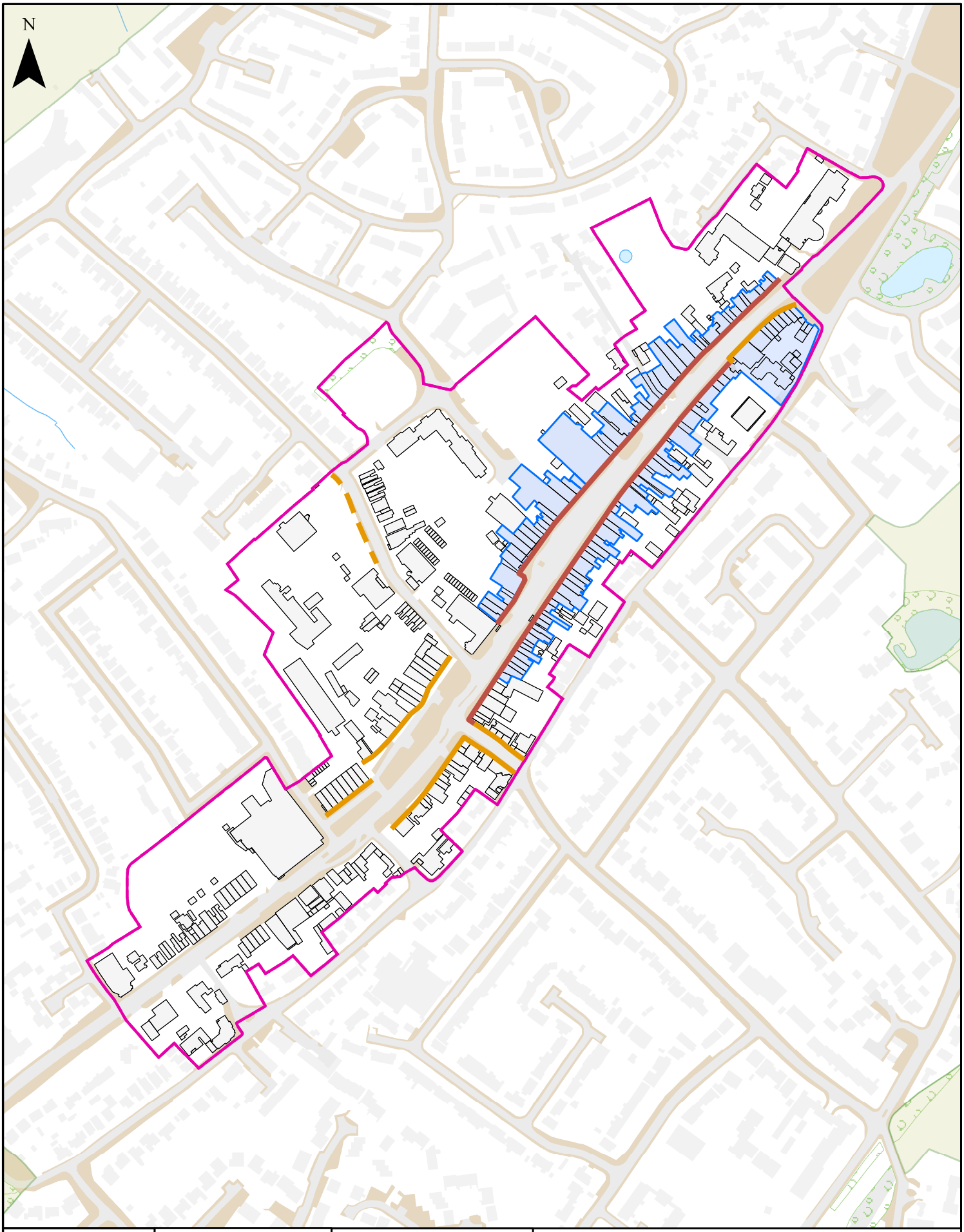
It was therefore concluded that the preferred option for Epping is to retain the existing boundary – Option E5 (Figure 2).

It was also concluded that a Primary Shopping Area should be designated in Epping. It is proposed that this area covers all areas of Primary Frontage, and in addition the area of Secondary Frontage at the north-eastern end of the High Street. This designation would result in a Primary Shopping Area of 759 metres, with 62% being retail (A1). The Primary Shopping Area units would account for 68% of all town centre retail units (A1).

The suggested changes to the Town Centre boundary, and proposals for Primary/Secondary Frontage are set out in Figure 2.

Status in Centres' Hierarchy

Epping accounts for the second highest share of A1-A5 floorspace (26%) across the six centres in the District. The analysis of the Town's overall health suggests that it is still attractive to retailing activity. Epping is therefore recommended for classification as a 'Town Centre' in the Draft Local Plan.



Local Plan 2011-2033
Draft Plan
Consultation

Epping Forest District Council

Drawing No.
EFDC-DP-00105-Rev1

Date: September 2016

Scale: 1:4,000 @A4

Content
Proposed District Centre Boundary, Primary Shopping Area, and Primary and Secondary Frontages in Epping

Legend

- Proposed amendments to District Centre Boundary
- Existing District Centre Boundary
- Existing Distrct Centre Boundary to be amended
- Primary Shopping Area
- Primary Frontage
- Secondary Frontage
- Potential for new Secondary Frontage

4.3.2 Loughton High Road

Primary Frontage

The Key Frontage of Loughton High Road is currently composed of 69% retailing (A1) and 31% non-retail uses based on frontage lengths (2015 survey) (see Appendix B.3) based on ground floor frontage lengths. These figures compare with around 37% retailing (A1) in non-Key Frontages (see Appendix B.3).

These findings suggest that the existing Local Plan policies have supported a higher proportion of retail (A1) uses sufficient to differentiate the Key Frontage from other frontages, which is consistent with the 'high proportion' of retail (A1) uses required to align with the NPPF definition of Key Frontages. The current proportion of A1 retail within the Key Frontage is also broadly consistent with the 70% retail uses required by TC4 in the Local Plan 1998 Updated with Alterations 2006.

An assessment of the different options for designating Primary Frontage for Loughton High Road was undertaken. The options considered are set out below:

Option	Assessment
LH1: Existing Key Frontage becomes Primary Frontage	Although there is some dilution of A1 Class Uses in the existing Key Frontage, the proportion of A1 remains high. A visual inspection of the distribution of activities within the centre doesn't show any clusters of non-retailing within the existing Key Frontage. The former Brown's Car Show Room is now in A2 Class Use. It also sits alone and does not form part of any contiguous frontage.
LH2: Existing Key Frontage becomes Primary Frontage, excepting the former Brown's Car Show Room which is removed from Primary Frontage.	

Based on the assessment of options, the preferred option for Loughton High Road is to retain the existing Key Frontage as Primary Frontage, with the exception of the former Brown's Car Show Room frontage.

This revision results in Primary Frontage of 741, of which 70% are retail (A1) class use. The proportion of retail (A1) within the Primary Frontage should be set at 70% as a means of safeguarding retail activity.

Secondary Frontage

The non-Key Frontages within Loughton High Road were composed of 37% retailing (A1) and 63% non-retail uses based on ground floor frontage lengths (see Appendix B.3).

While these findings suggest that there is a reasonable level of retail activity within non-Key Frontage lengths and that these frontages are complimentary to the Primary Frontages defined above, not all non-Key Frontage provides sufficient retail (or complimentary) uses. An assessment of the different options for designating Secondary Frontage for Loughton High Road was therefore undertaken. The options considered are set out below:

Option	Assessment
LH3: Existing non-Key Frontage becomes Secondary Frontage	The majority of non-Key Frontage show a good level of retail or other A-Class Uses which are complementary to the Primary Frontage. A visual inspection of the distribution of activities within non-Key Frontages has identified some small areas of non-retailing uses which may justify fragmenting the existing non-Key Frontage, these include units within the station, the Sainsbury's superstore, and units at the south-eastern edge of the centre boundary.
LH4: The majority of the existing non-Key Frontage becomes Secondary Frontage, with some smaller areas remaining un-designated	

Based on the assessment of options, the preferred option for Loughton High Road is for the existing non-Key Frontage (and the former Brown's Car Show Room) to become Secondary Frontage, excepting some areas to remain un-designated.

This revision would result in a Secondary Frontage of 628 metres in length, 34% of which would be in retail (A1) use. These Secondary Frontages should form the basis of a formal designation in the Local Plan with minimum level of retail frontage being set at 35%. While this proportion is marginally less than the current position suggested by the market, it is likely that trends towards non-retail uses have further eroded the proportion of retail since the survey date.

Town Centre Boundary and Primary Shopping Area

Given the visual inspection of the distribution of Town Centre uses and stakeholder comments, and proposed Primary and Secondary Frontages, an assessment of the extent of the Town Centre was undertaken. The options considered are set out below:

Option	Assessment
LH5: Retain existing Centre boundary with minor alterations to include Loughton Social Club.	A workshop with members raised the option to remove Loughton Station and Car Park from the Centre boundary due to their isolated position away from the main centre. Through the site selection process, Loughton Station Car Park has been identified as a potential development site (SR-0226). It is therefore considered this should be retained within the Centre. Loughton Social Club currently sits outside the Town Centre boundary. This is considered to be a Town Centre use, and a more logical break from the neighbouring retail uses.
LH6: As above, but reduce the Centre boundary in south to exclude Loughton Station.	

Based on the assessment of options, the preferred option for Loughton High Road is to retain the existing Centre boundary with minor alterations to include Loughton Social Club (Figure 3).

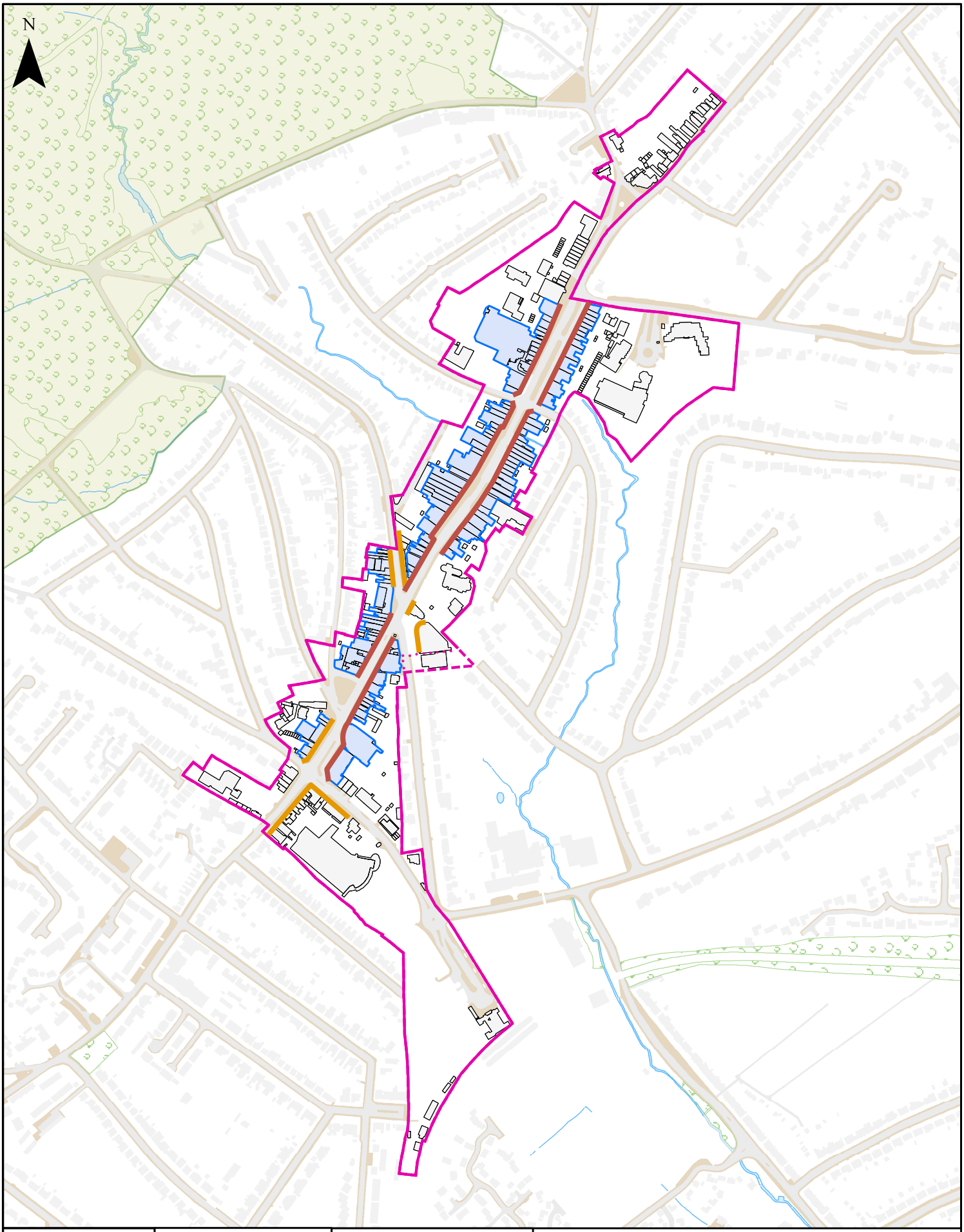
It was also concluded that a Primary Shopping Area should be designated in Loughton High Road within the Centre boundary. It is proposed that this area covers all areas of Primary Frontage, as well as areas of Secondary Retail Frontage on Forest Road and units 104 to 117 High Road.

This designation would result in a Primary Shopping Area encompassing 1,270 metres of shopping frontage, accounting for 69% of all Town Centre property units in the Town Centre. A total of 67% of units in the Primary Shopping Area would be retail units within the Town Centre.

The suggested changes to the Town Centre boundary, and proposals for Primary/Secondary Retail Frontage are set out in Figure 3.

Status in Centres' Hierarchy

Loughton High Road occupies the top position in the centre hierarchy with both the greatest share A1-A5 floorspace (34%) across the six centres. Loughton High Road is therefore recommended for classification as a 'Town Centre' in the Draft Local Plan.



Local Plan 2011-2033
Draft Plan
Consultation

Epping Forest District Council

Drawing No.
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Date: September 2016

Scale: 1:6,000 @A4

Content
Proposed District Centre Boundary, Primary Shopping Area, and Primary and Secondary Frontages in Loughton High Road

Legend

- Proposed amendments to District Centre Boundary
- Existing District Centre Boundary
- Existing Distrct Centre Boundary to be amended
- Primary Shopping Area
- Primary Frontage
- Secondary Frontage

4.3.3 Buckhurst Hill

Primary Frontage

The Key Frontages of Buckhurst Hill Centre are currently composed of 65% retailing (A1 Class Use) and 35% non-retail uses based on ground floor frontage lengths (see Appendix B.4). These figures compare with around 31% retailing (A1) in non-Key Frontages (see Appendix B.4).

These findings suggest that the existing Local Plan policies have supported a higher proportion of retail (A1) uses sufficient to differentiate the Key Frontage from other frontages, which is consistent with the 'high proportion' of retail (A1) uses required to align with the NPPF definition of Key Frontages. The current proportion of A1 retail within Buckhurst Hill's Key Frontage is, however, less than the 70% retail uses required by TC4 in the Local Plan (1998) and Alterations (2006).

An assessment of the different options for designating Primary Frontage for Buckhurst Hill was undertaken. The options considered and the assessment findings are set out below:

Option	Assessment
BH1: Existing Key Frontage becomes Primary Frontage	Although there is some dilution of A1 uses in the existing Key Frontage, the proportion of A1 remains high. A visual inspection of the distribution of activities within the centre doesn't show any clusters of non-retailing within the existing Key Frontage.
BH2: All frontage in the centre becomes Primary Frontage	The area to the west of King's Avenue contains a larger proportion of non-retail compared to the existing Key Frontage, making it less suitable as Primary Frontage. Extending the length of the Primary Frontage would also reduce the area for other complementary non-retail uses in the District Centre, which are currently a significant draw. Given the limited additional demand for retail floorspace within the District, the Council considers there may be insufficient demand to support an extension to the length of Primary Frontage.

It was, therefore concluded that the preferred option for Buckhurst Hill is to retain the existing Key Frontage as Primary Frontage. This option results in a frontage length of 298 metres being classed as 'primary', of which currently 65% of the frontage length is in retail (A1) use.

Secondary Frontage

Non-Key frontages within Buckhurst Hill Centre are currently made up of 31% retailing (A1) and 69% non-retail uses based on ground floor frontage lengths (see Appendix B.4).

The mix of uses in these areas suggests that there is a reasonable level of main Town Centre uses within these frontage lengths and that these frontages are complimentary to the Primary Frontages defined above. It is therefore proposed

that all existing non-Key Frontages become Secondary Frontage (excepting the nursery school on the corner of King's Avenue, which is set back from the road).

Secondary Frontages would therefore form the basis of a formal designation in the Local Plan resulting in 192 metres of frontage, of which currently 40% is in retail (A1) use. The Local Plan should set a minimum proportion of retail frontage at 40% in this frontage.

Town Centre Boundary and Primary Shopping Area

Given the visual inspection of the distribution of Town Centre uses and stakeholder comments, and proposed Primary and Secondary Frontage, an assessment of the extent of the District Centre was undertaken.

An area of significant retail activity was identified west of Buckhurst Hill, which is currently designated as a Local Shopping Centre in the Local Plan (1998) and Alterations (2006). The option to expand the Buckhurst Hill Centre boundary to include these units was considered due to the scale of the offer in the Local Shopping Centre. However, the distance between the two centres is considered to be too significant, and the centres operate largely independently of each other.

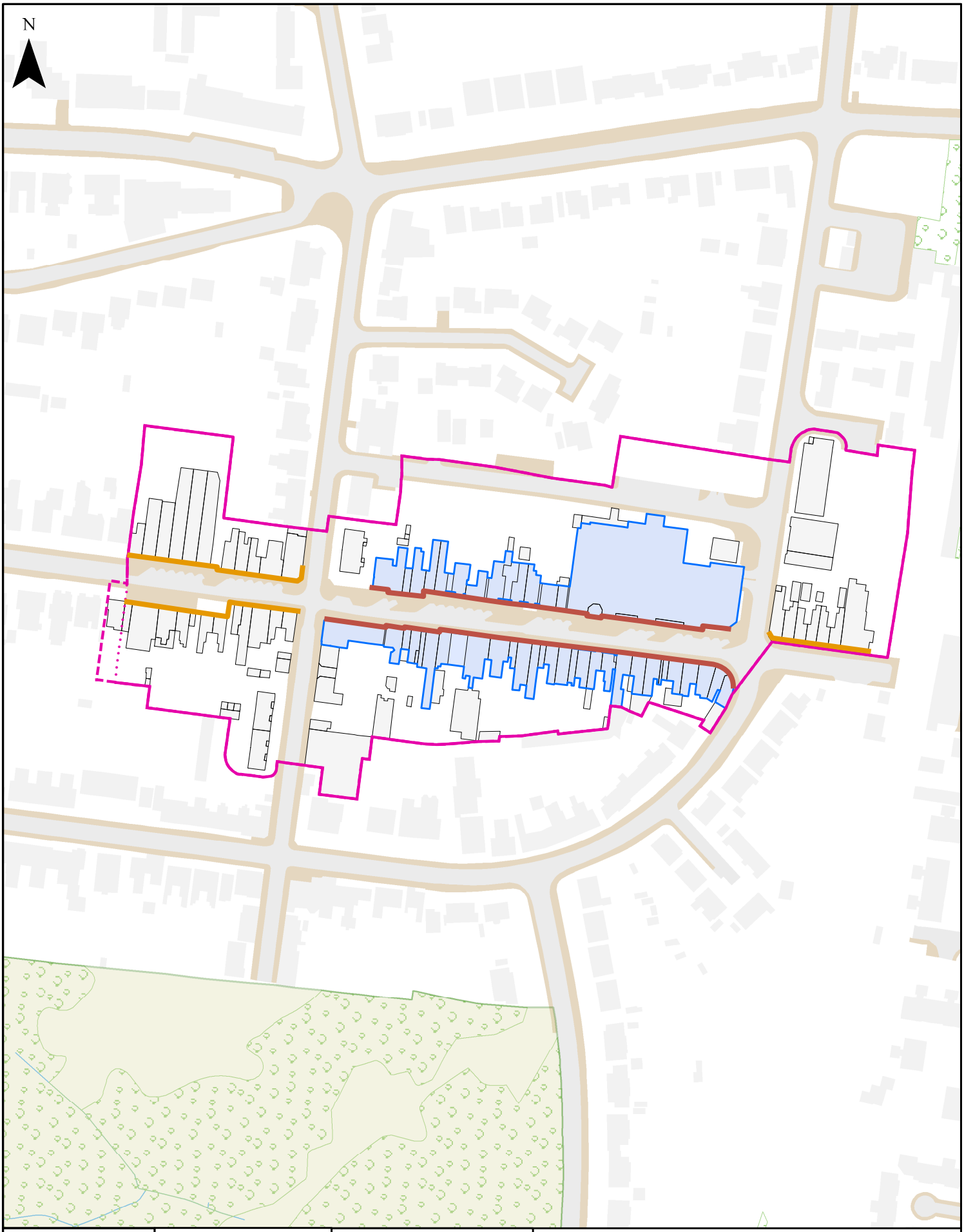
It was, therefore concluded that the preferred option for Buckhurst Hill is to retain the existing Centre boundary with a minor alteration to include a unit currently divided in two by the boundary.

It was also concluded that a Primary Shopping Area should be designated in Buckhurst Hill within the Centre boundary. It is proposed that this area covers all areas of Primary Frontage, as shown in Figure 4. The Primary Shopping Area would account for 55% of property units in the Town Centre. A total of 57% of existing units within the area are retail (A1).

The suggested changes to the Town Centre boundary, and proposals for Primary/Secondary Retail Frontage are set out in Figure 4.

Status in Centres' Hierarchy

Buckhurst Hill lacks a critical mass of Town Centre uses (accounting for only 10% of A1-A5 Class Use floorspace across the six centres) to qualify as a Town Centre in a revised hierarchy of Centres. Buckhurst Hill is therefore recommended for classification as a 'Small District Centre' in the Draft Local Plan.



Local Plan 2011-2033
Draft Plan
Consultation

Epping Forest District Council

Drawing No.
EFDC-DP-00103-Rev1

Date: September 2016

Scale: 1:2,000 @A4

Content
Proposed District Centre Boundary, Primary Shopping Area, and Primary and Secondary Frontages in Buckhurst Hill

Legend

- Proposed amendments to District Centre Boundary
- Existing District Centre Boundary
- Existing Distrct Centre Boundary to be amended
- Primary Shopping Area
- Primary Frontage
- Secondary Frontage

4.3.4 Chipping Ongar

Primary Frontage

The Key Frontages of Chipping Ongar are currently composed of 51% retailing (A1) and 49% non-retail uses, based on ground floor frontage lengths (see Appendix B.5). These figures compare with around 29% retailing (A1) in non-Key Frontages (see Appendix B.5).

These findings suggest that the existing Local Plan policies have supported a higher proportion of retail (A1) uses sufficient to differentiate the Key Frontage from other frontages, which is consistent with the 'high proportion' of retail (A1) uses required to align with the NPPF definition of Key Frontages. The current proportion of A1 retail within Chipping Ongar's Key Frontage is, however, less than the 70% retail uses required by TC4 in the Local Plan (1998) and Alterations (2006).

Based on the review of existing Key Frontages, an assessment of the different options for designating Primary Frontage for Chipping Ongar was undertaken. The options considered are set out below:

Option	Assessment
CO1: Existing Key Frontage becomes Primary Frontage	Although there is some dilution of A1 uses in the existing Key Frontage, the proportion of A1 remains high. A visual inspection of the distribution of activities within the centre doesn't show any large clusters of non-retailing within the existing Key Frontage.
CO2: Existing Key Frontage becomes Primary Frontage and is extended to cover western side of the high street from units 183 to 135 High Street.	The area of possible extension contains a large proportion of non-retail (A1 uses) compared to the existing Key Frontage, making it unsuitable as Primary Frontage. Extending the length of the Primary Retail Frontage would also reduce the area for other complementary non-retail (A1) uses in the District Centre, which are currently a significant draw. Given the limited additional demand for retail floorspace within the District, the Council considers there may be insufficient demand to support an extension to the length of Primary Retail Frontage.

It was, therefore concluded that the preferred option for Chipping Ongar is to retain the existing Key Frontage as Primary Frontage resulting in a Primary Frontage of 300 metres, of which currently 51% is retail (A1). The proportion of retail (A1) within the Primary Frontage should be set at 50%.

Secondary Frontage

Non-Key frontages within Chipping Ongar Centre are currently composed of 29% retailing (A1) and 71% non-retail uses based on ground floor frontage lengths (see Appendix B.5).

While these findings suggest that there is a reasonable level of retail activity within non-Key Frontage lengths and that these frontages are complimentary to

the Primary Frontages defined above, not all non-Key Frontage provides sufficient retail (or complementary) uses. A visual inspection of the distribution of activities within non-Key Frontages has identified some small areas of non-retail uses which may justify change. Therefore, the preferred approach for Chipping Ongar is for the majority of the existing non-Key Frontage to become Secondary Frontage, with some smaller lengths remaining un-designated.

The visual inspection of use distribution also identified the exclusion of a parade of shops to the south of the existing centre which is logically associated with the current frontages, and is currently designated as a Local Shopping Centre. It is proposed that this parade of shops become designated as Secondary Frontage also.

These Secondary Frontages would form the basis of a formal designation in the Local Plan resulting in a frontage length of 362 metres, of which currently 45% is in retail (A1) use. The Local Plan should set a minimum proportion of retail frontage length in this Secondary Frontage.

Town Centre Boundary and Primary Shopping Area

Given the visual inspection of the distribution of Town Centre uses and stakeholder comment, and proposed Primary and Secondary Frontages, an assessment of the extent of the Centre boundary was undertaken. The options considered are set out below:

Option	Assessment
CO3: Retain existing centre boundary	Centre boundary is already quite significant in size, and provides a range of appropriate Town Centre uses. The Local Shopping Centre to the south of the boundary provides local convenience retail whilst the District Centre provides a wider range of convenience and comparison retail as well as non-retail uses. Notwithstanding the above, the distance between the two designated centres is limited and therefore they effectively operate as a single retail area. It is not considered appropriate to designate these two areas differently. Expansion of the Town Centre to cover both sides of the road would be a significant increase in area, and the uses on the eastern edge of the High Street are non-A Class Uses, excepting one. These are largely residential.
CO4: Extend centre boundary to south (western edge only) to include the existing retail units (which are currently designated a Local Shopping Centre)	
CO5: Extend centre boundary to south (both edges) to include the existing retail units and residential properties opposite	

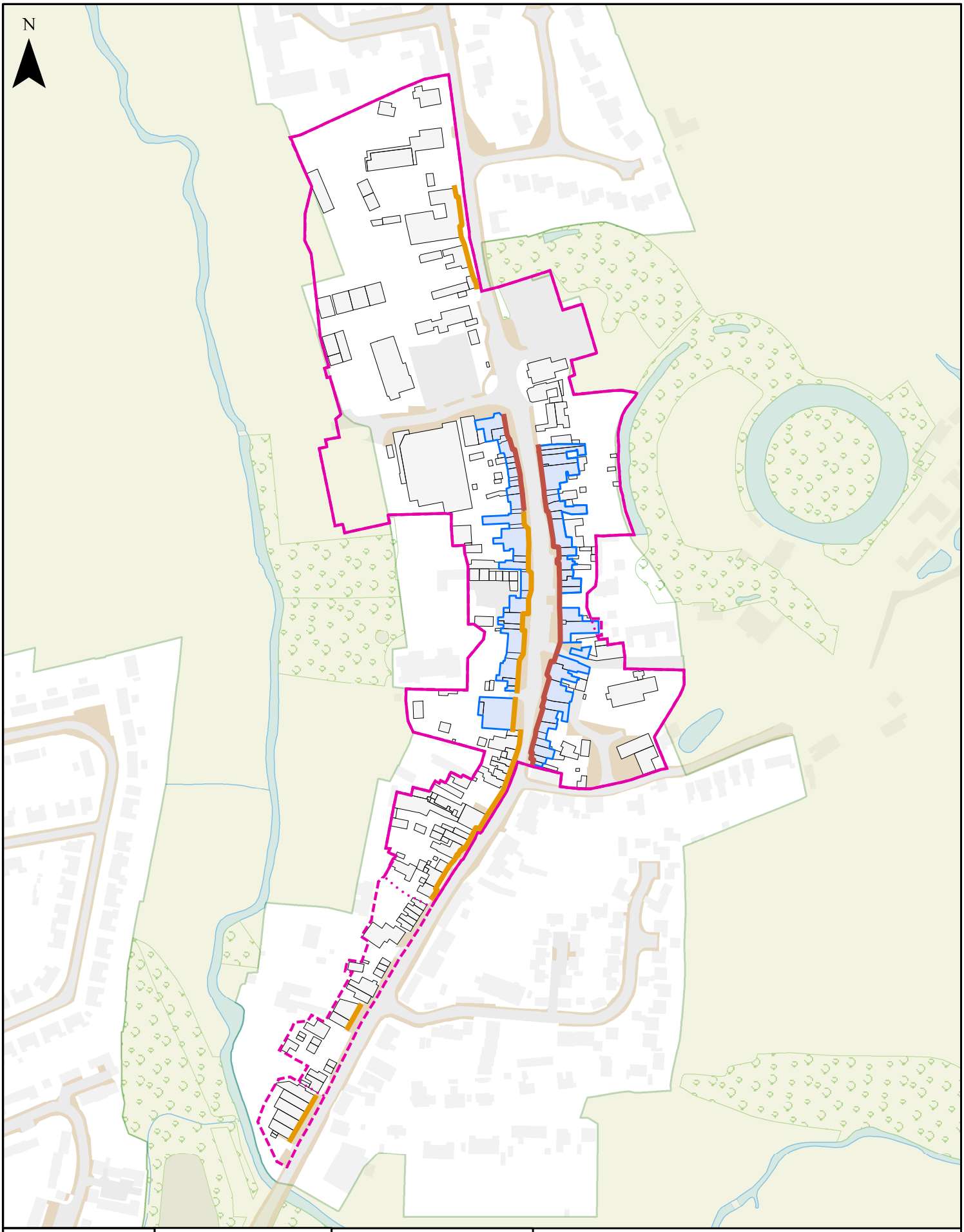
It was, therefore concluded that the preferred option for Chipping Ongar is to extend the Centre boundary to the south along the western edge of the High Street, to include the existing retail units currently designated as a Local Shopping Centre (Option CO5).

It was also concluded that a Primary Shopping Area should be designated in Chipping Ongar within the new District Centre boundary. It is proposed that this area covers all areas of Primary Frontage, and in addition the area of Secondary Frontage from units 135 to 183 High Street. The Primary Shopping Area is shown on Figure 5.

The suggested changes to the Town Centre boundary, and proposals for Primary/Secondary Frontage are set out in Figure 5.

Status in Centres' Hierarchy

Chipping Ongar lacks a critical mass of Town Centre uses (accounting for only 8% of A1-A5 Class Use floorspace across the six centres) to qualify as a Town Centre in a revised hierarchy of Centres. Chipping Ongar is therefore recommended for classification as a Small District Centre in the Draft Local Plan.



Local Plan 2011-2033
Draft Plan
Consultation

Epping Forest District Council

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Content
Proposed District Centre Boundary, Primary Shopping Area, and Primary and Secondary Frontages in Chipping Ongar

Legend
- Proposed amendments to District Centre Boundary
- Existing District Centre Boundary
- Existing Distrct Centre Boundary to be amended
- Primary Shopping Area
- Primary Frontage
- Secondary Frontage

4.3.5 Loughton Broadway

Primary Frontage

The Key Frontages of Loughton Broadway are currently composed of 71% retailing (A1) and 29% non-retail uses, based on ground floor frontage lengths (see Appendix B.6). These figures compare with around 30% retailing (A1) in non-Key Frontages (see Appendix B.6).

These findings suggest that the existing Local Plan policies have supported a higher proportion of retail (A1) uses sufficient to differentiate the Key Frontage from other frontages, which is consistent with the 'high proportion' of retail (A1) uses required to align with the NPPF definition of Key Frontage. The current proportion of A1 retail within Loughton Broadway's Key Frontage is more than the 70% retail uses required by TC4 in the Local Plan (1998) and Alterations (2006).

An assessment of the different options for designating Primary Frontage for Loughton Broadway was undertaken. The options considered are set out below:

Option	Assessment
LB1: Existing Key Frontage becomes Primary Frontage	Although there is some dilution of A1 uses in the existing Key Frontage, the proportion of A1 remains high. A visual inspection of the distribution of activities within the centre doesn't show any clusters of non-retailing within the existing Key Frontage. The Non-Key Frontage within Loughton Broadway shows little difference in the proportion of A1 uses to existing Key Frontage, and therefore its exclusion from Primary Frontage appears illogical. New development of former Winston Churchill pub will include A1 and A3 uses at ground floor level, and should form part of Primary Frontage.
LB2: Existing Key Frontage becomes Primary Frontage and is extended to include all units along the Broadway, excepting the Sainsbury's and BP Garage.	

It was, therefore concluded that the preferred option for Loughton Broadway is to retain the existing Key Frontage as Primary Frontage, and to extend the Primary Frontage to include all units along the Broadway, excepting the Sainsbury's and BP Garage. This revision results in a Primary Frontage length of 520 metres, of which 61% of units are currently in retail (A1) use. The proportion of retail (A1) within the Primary Frontage should be set at 60%.

Secondary Frontage

Non-Key Frontages within Loughton Broadway Centre were composed of 30% retailing (A1) and 70% non-retail uses based on ground floor frontage lengths (see Appendix B.6).

As set out above, it is the preferred option that the majority of this Key Frontage be designated as Primary Frontage within the Broadway. A visual inspection of the distribution of activities and nature of frontages suggests that the BP Garage

along the Broadway performs the role of Secondary Frontage, while the Sainsbury's superstore has no role in Primary of Secondary Frontage.

Given the character of the proposed Secondary Frontage consisting currently of a *sui generis* use (garage), no specific proportion is proposed for this frontage area.

Town Centre Boundary and Primary Shopping Area

Given the visual inspection of the distribution of Town Centre uses and stakeholder comments, and proposed Primary and Secondary Frontage, an assessment of the extent of the Centre boundary was undertaken. The options considered are set out below:

Option	Assessment
LB3: Retain existing centre boundary (with a minor alteration which excludes a single residential unit currently within the western edge of the boundary).	The existing centre provides a good range of main Town Centre uses and reflects the spatial extent of these uses within the Broadway. Langston Road proposes a significant increase in retail provision in proximity to the Loughton Broadway Centre. Nevertheless, the 'out-of-town' nature and significant scale of the development is such that it would fundamentally change the nature of Loughton Broadway if included within it. The distance between Langston Road and Loughton Broadway is significant and it is considered there is insignificant justification to extend the boundary to this extent.
LB4: Extend centre boundary to south to include new Langston Road retail development.	

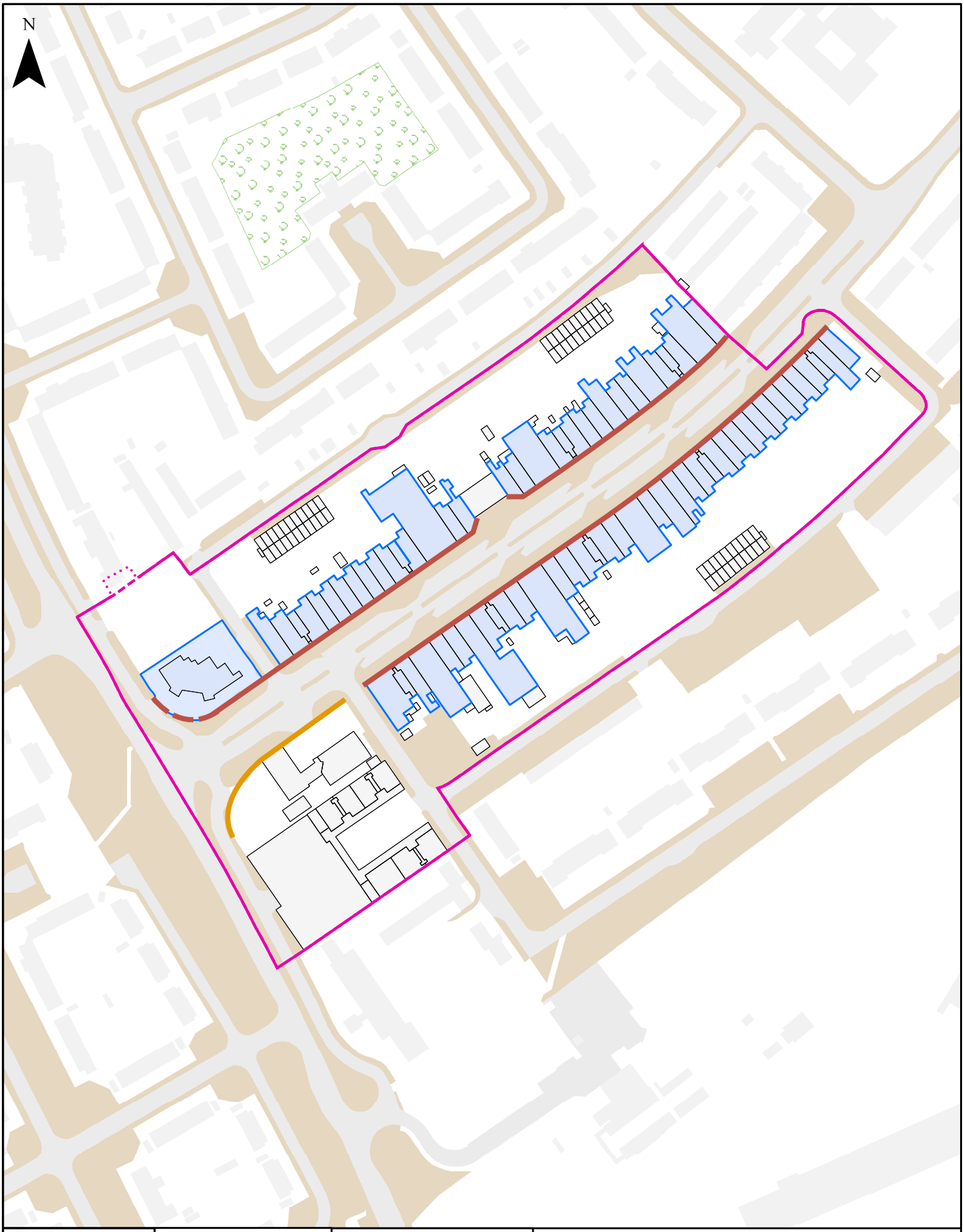
It was, therefore concluded that the preferred option for Loughton Broadway is to retain the existing District Centre boundary (see Figure 6). Consideration should be given to making Langston Road an out-of-Town Centre in its own right.

It was also concluded that a Primary Shopping Area should be designated in Loughton Broadway within the Centre boundary. It is proposed that this area covers all areas of Primary Frontage.

The suggested changes to the Town Centre boundary, and proposals for Primary and Secondary Frontage are set out in Figure 6.

Status in Centres' Hierarchy

Loughton Broadway lacks a critical mass of Town Centre uses (accounting for only 11% of A1-A5 Class Use floorspace across the six centres), Loughton Broadway is therefore recommended for classification as a 'Small District Centre' in the Draft Local Plan.



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Epping Forest District Council

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Content
Proposed District Centre Boundary, Primary Shopping Area, and Primary and Secondary Frontages in Loughton Broadway

Legend

- Proposed amendments to District Centre Boundary
- Existing District Centre Boundary
- Existing Distrct Centre Boundary to be amended
- Primary Shopping Area
- Primary Frontage
- Secondary Frontage
- Potential for new Primary Frontage

4.3.6 Waltham Abbey

Primary Frontage

The Key Frontages of Waltham Abbey are currently composed of 64% retailing (A1) and 36% non-retail uses, based on ground floor frontage lengths (see Appendix B.7). These figures compare with around 20% retailing (A1) in non-Key Frontages.

These findings suggest that the existing Local Plan policies have supported a higher proportion of retail (A1) uses sufficient to differentiate the Key Frontage from other frontages, which is consistent with the 'high proportion' of retail (A1) uses required to align with the NPPF definition of Key Frontage. The current proportion of A1 retail within Waltham Abbey's Key Frontage is broadly consistent with the 70% retail uses required by TC4 in the Local Plan (1998) and Alterations (2006).

An assessment of the different options for designating Primary Frontage for Waltham Abbey was undertaken. The options considered are set out below:

Option	Assessment
WA1: Existing Key Frontage becomes Primary Frontage	Although there is some dilution of A1 uses in the existing Key Frontage, the proportion of A1 remains high.
WA2: Existing Key Frontage becomes Primary Frontage and is extended to cover all of the northern side of Sun Street and Market Square up to Leverton Way.	The non-Key Frontage on the north side of Sun Street and in Market Square shows little difference in the proportion of A1 uses to existing Key Frontage, and therefore its exclusion from the Primary Frontage appears illogical.

It was therefore concluded that the preferred option for Waltham Abbey is to retain the existing Key Frontage as Primary Frontage, and extend it to cover all of the north side of Sun Street and Market Square up to Leverton Way.

This revision results in a Primary Frontage length of 537 metres, of which 45% of the frontage length are in retail (A1) use. The proportion of retail (A1) within the Primary Frontage should be set at 45%.

Secondary Frontage

Non-Key Frontages within Waltham Abbey were composed of 20% retail (A1) and 80% non-retail uses, based on ground floor frontage lengths (See Appendix B.7).

As set out above, the potential for non-Key Frontage in Waltham Abbey to become Primary Frontage was assessed, and has been recommended as the preferred option for some of the existing non-Key Frontage along the north side of Sun Street and within Market Square up to Leverton Way.

The remainder of the non-Key Frontage outwith this has been assessed in terms of its suitability to be designated as Secondary Frontage. As shown on Figure 7, it is proposed that the Secondary Frontage should comprise much of the existing non-

Key Frontage along Highbridge Street (with the exception of a cluster of non-retail uses on the northern side), Church Street, the southern side of Market Square fronting onto Leverton Way, and a small parade of shops along fronting onto Sewardstone Road at the eastern end of Sun Street. The mix of uses in these areas suggests that there is a reasonable level of retail activity within these frontage lengths and that these frontages are complimentary to the Primary Frontages defined above.

This revision would result in a Secondary frontage of 396 metres, of which 25% of the frontage length would be retail. These Secondary Frontages would form the basis of a formal designation in the Local Plan with minimum level of retail frontage being set at 25%.

The remainder of non-Key Frontage is not proposed for designation, as the proportion of non-retail uses within these frontage lengths is very high.

Town Centre Boundary and Primary Shopping Area

Given the visual inspection of the distribution of Town Centre uses, stakeholder comments, and proposed Primary and Secondary Retail Frontage, an assessment of the extent of the District Centre was undertaken. The options considered are set out below:

Option	Assessment
WA3: Retain existing centre boundary	Town Centre boundary includes large units to the south east (notably the Tesco Superstore), which are more characteristic of edge of town/out of town areas in terms of size. The large size of the units in this area is also incongruous with the remainder of units within the boundary, which are some of the smallest in the District.
WA4: Reduce the centre in the south east, with Sewardstone Road forming the new boundary	This would result in a significant compaction of the centre in terms of area. The large units to the south east, which are somewhat incongruous with the rest of the centre, would no longer be included within the boundary. The centre would be more focused around the Primary and Secondary Retail Frontages in and around Sun St.
WA5: As above, with an extension across Sewardstone Road to include Lea Valley Church.	As above. Sewardstone Road is a busy road which acts as a clearly definable boundary, meaning that any extension to the centre which crosses the road may be unsuitable. The predominant uses within the small additional area proposed for inclusion are non-retail.
WA6: Reduce the centre to the west, with the new boundary located at Winchester Close.	This would prevent the centre from stretching beyond the busy roundabout. All uses in the area proposed for exclusion are non-retail.

It was therefore concluded that the preferred option for Waltham Abbey is a combination of options WA2 and WA4, with the centre being reduced to the south east, with the new boundary being formed by Sewardstone Road, and also being reduced to the west, with the new boundary at Winchester Close (see Figure 7).

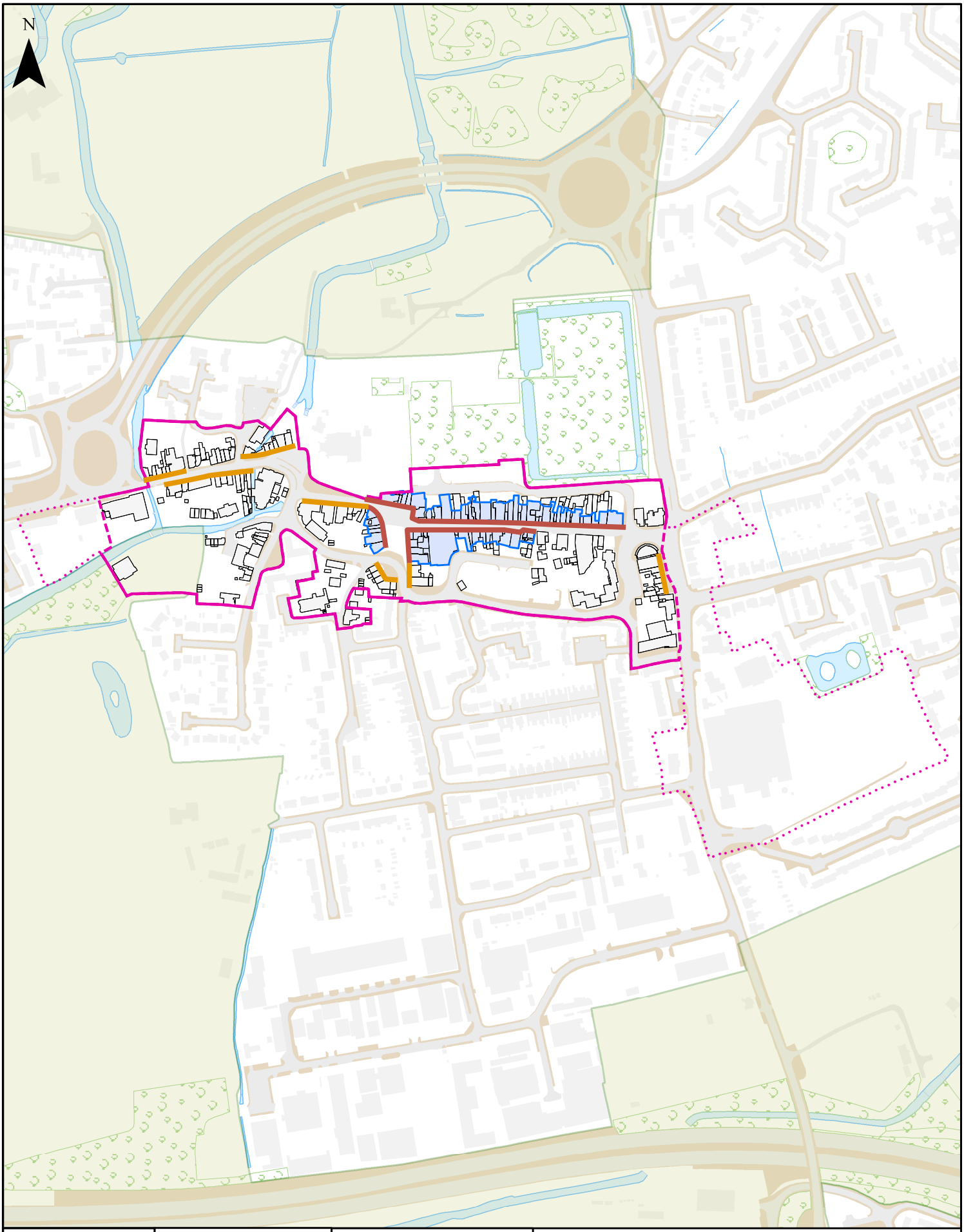
It was also concluded that a Primary Shopping Area should be designated in Waltham Abbey within the new Town Centre boundary. It is proposed that this area covers all areas of the proposed Primary Frontage.

Waltham Abbey is particularly at risk from recent changes to permitted development rights outlined by the Town and Country Planning Permitted Development (England) Order 2015 (as amended). This permits change of use from retail and other Town Centre uses to residential use for small units of 150 sq m or less. Given the small average unit size within Waltham Abbey Town Centre, these Permitted Development Rights could potentially result in the erosion of Town Centre uses within the Primary and Secondary Frontages. The Council may therefore wish to consider progressing an Article 4 Direction which would remove permitted development rights from the Town Centre.

The suggested changes to the Town Centre boundary, and proposals for Primary/Secondary Frontage are set out in Figure 7.

Status in Centres' Hierarchy

Waltham Abbey lacks a critical mass of Town Centre uses (accounting for only 11% of A1-A5 Class Use floorspace across the six centres), Waltham Abbey is therefore recommended for classification as a 'Small District Centre' in the Draft Local Plan.



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Content
Proposed District Centre Boundary, Primary Shopping Area, and Primary and Secondary Frontages in Waltham Abbey

Legend

- Proposed amendments to District Centre Boundary
- Existing District Centre Boundary
- Existing Distrct Centre Boundary to be amended
- Primary Shopping Area
- Primary Frontage
- Secondary Frontage

4.3.7 Summary

In preparing the Draft Local Plan the Council has to take into consideration the changing nature of town centres recognising the influence of the internet on trading, an increasing demand for services and the level of forecast growth across the District. While population growth is forecast, this does not necessarily translate into a need for more shop and service floorspace, particularly given the competition from nearby centres such as Westfield and the impact of internet trading. Indeed an over provision of floorspace could be detrimental to the health of centres, which in a number of cases have seen some decline in the level of retail provision. Equally under-provision will generate more journeys and potentially diminish the attractiveness of centres.

Increasing the market share of retail expenditure is considered to be an unrealistic position for the District, given the established nearby retail offer, including Harlow, Romford and Westfield that the District can and does not wish to compete with together with greater use of the internet for making purchases. A constant market share is more realistic, and this identifies a need for up to 59,700sq.m. of floorspace. When 'pipeline' development is removed there is a net need of 39,700sq.m.. From this it has been assumed that approximately 40% will be provided in Harlow (noting the link with the strategic allocations), recognising the contribution this town makes to service the needs of the District.

Table 11 illustrates the distribution across the settlements, based on maintaining the same percentage mix of comparison/ convenience and other floorspace types.

Table 11: Distribution of A1, A2 and A3-A5 Floorspace in Epping Forest District

Centre Name	Comparison (A1) sq.m.	Convenience (A1) sq.m.	A2 Use Classes (sq.m.)	A3-A5 Classes (sq.m.)
Buckhurst Hill	1,089	80	109	34
Chipping Ongar	1,252	550	125	232
Loughton/Debden	2,482	1,090	248	459
Epping	7,327	1,613	733	680
Waltham Abbey	1,667	732	167	309
Chigwell	0	398	0	168
North Weald Bassett	0	1,271	0	536
Theydon Bois	0	333	0	140
TOTAL	**13,816**	**6,067**	**1,382**	**2,558**

For convenience and A3-A5 the floorspace is distributed across existing centres and those settlements where growth is proposed to the settlements which result in some small allocations (in practice probably representative of a shop extension/ change of use). Smaller allocations were then consolidated by grouping allocations under 150 sq.m. into the nearest centre designated under the centre's hierarchy with the exception of those settlements nearest to Harlow. The application of the size threshold suggests a need to allocate sites in Chigwell, North Weald Bassett and Theydon Bois given the scale of residential growth envisaged in these settlements.

For comparison and A2, the floorspace is aggregated up to the nearest large centre designated under the proposed centres hierarchy. The comparison floorspace need is however subject to the caveat that the level of growth assumes the same level of attractiveness for comparison shopping as surveyed in 2009.

Given there is uncertainty as to the attractiveness of the centres and the market share of expenditure retaining the District, the amount of floorspace suggested by the model should be given further consideration as the Local Plan is developed. A consumer survey should be completed to further inform the quantum of floorspace required in the period to 2033; premature provision of new space may damage the prospect of existing centres.

The new retail park proposed in Loughton should be given consideration is an ‘out of centre’ designation in the Draft Local Plan. This site is under construction and as such this would be an appropriate policy designation. The need for other out of centre sites should be reviewed once the findings of the suggested market share analysis was known

Appendix A

Town Centres - Changes in Retail / Non-Retail Activity

A1 Epping

	2009	2015
Total units (no.)	157	156
Total Frontage Length (m)	1,278	1,273
Total Floorspace (sq.m)	25,260	25,160

Key Frontage

	2009			2015			2009-2015	
	Total	Retail	Non Retail	**Total**	Retail	Non Retail	Retail	Non Retail
Units (no.)	**94**	69	25	**94**	65	29	-6%	16%
Frontage Lengths (m)	**657**	478	179	**657**	456	201	-5%	12%
Floorspace (sq.m.)	**14,560**	10,910	3,650	**14,560**	10,570	3,990	-3%	9%

Non-Key Frontage

	2009			2015			2009 to 2015	
	Total	Retail	Non Retail	**Total**	Retail	Non Retail	Retail	Non Retail
Units (no.)	**62**	37	25	**59**	26	33	-30%	32%
Frontage Lengths (m)	**616**	350	266	**589**	253	336	-28%	26%
Floorspace (sq.m.)	**10,600**	6,670	3,930	**10,280**	6,010	4,270	-10%	9%

All Occupied Frontage

	2009			2015			2009 to 2015	
	Total	Retail	Non Retail	**Total**	Retail	Non Retail	Retail	Non Retail
Units (no.)	**156**	106	50	**153**	91	62	-14%	24%
Frontage Lengths (m)	**1,273**	828	445	**1,247**	709	537	-14%	21%
Floorspace (sq.m.)	**25,160**	17,580	7,580	**24,840**	16,580	8,260	-6%	9%

Vacant Frontage

	2009	2015
Units (no.)	1	3
Frontage Lengths (m)	5.4	26
Floorspace (sq.m.)	100	320

A2 Loughton High Road

	2009	2015
Total units (no.)	210	209
Total Frontage Length (m)	2,007	1,999
Total Floorspace (sq.m)	37,660	37,890

Key Frontage

	2009			2015			2009 to 2015	
	Total	Retail	Non Retail	**Total**	Retail	Non Retail	Retail	Non Retail
Units (no.)	**130**	96	34	**129**	91	38	-5%	12%
Frontage Lengths (m)	**988**	707	281	**977**	692	285	-2%	1%
Floorspace (sq.m.)	**24,470**	18,720	5,750	**24,830**	18,820	6,010	1%	5%

Non-Key Frontage

	2009			2015			2009 to 2015	
	Total	Retail	Non Retail	**Total**	Retail	Non Retail	Retail	Non Retail
Units (no.)	**71**	33	38	**70**	24	46	-27%	21%
Frontage Lengths (m)	**961**	419	542	**945**	362	583	-14%	8%
Floorspace (sq.m.)	**12,920**	7,330	5,590	**12,710**	5,970	6,740	-19%	21%

All Occupied Frontage

	2009			2015			2009 to 2015	
	Total	Retail	Non Retail	**Total**	Retail	Non Retail	Retail	Non Retail
Units (no.)	**201**	129	72	**199**	115	84	-11%	17%
Frontage Lengths (m)	**1,949**	1,126	823	**1,921**	1,054	867	-6%	5%
Floorspace (sq.m.)	**37,390**	26,050	11,340	**37,540**	24,790	12,750	-5%	12%

Vacant Frontage

	2009	2015
Units (no.)	9	10
Frontage Lengths (m)	58.2	78
Floorspace (sq.m.)	270	350

A3 Buckhurst Hill

	2009	2015
Total units (no.)	100	100
Total Frontage Length (m)	732	732
Total Floorspace (sq.m)	11,568	11,809

Key Frontage

	2009			2015			2009 to 2015	
	Total	Retail	Non Retail	**Total**	Retail	Non Retail	Retail	Non Retail
Units (no.)	**38**	25	13	**40**	24	16	-4%	23%
Frontage Lengths (m)	**277**	196	81	**296**	192	105	-2%	29%
Floorspace (sq.m.)	**5,271**	4,159	1,112	**5,512**	4,117	1,395	-1%	25%

Non-Key Frontage

	2009			2015			2009 to 2015	
	Total	Retail	Non Retail	**Total**	Retail	Non Retail	Retail	Non Retail
Units (no.)	**57**	32	25	**58**	29	29	-9%	16%
Frontage Lengths (m)	**421**	194	227	**414**	163	252	-16%	11%
Floorspace (sq.m.)	**6,075**	3,199	2,876	**6,015**	2,948	3,067	-8%	7%

All Occupied Frontage

	2009			2015			2009 to 2015	
	Total	Retail	Non Retail	**Total**	Retail	Non Retail	Retail	Non Retail
Units (no.)	**95**	57	38	**98**	53	45	-7%	18%
Frontage Lengths (m)	**698**	390	308	**710**	354	356	-9%	15%
Floorspace (sq.m.)	**11,346**	7,358	3,988	**11,527**	7,065	4,462	-4%	12%

Vacant Frontage

	2009	2015
Units (no.)	5	2
Frontage Lengths (m)	33.8	22
Floorspace (sq.m.)	222	282

A4 Chipping Ongar

	2009	2015
Total units (no.)	66	66
Total Frontage Length (m)	626	626
Total Floorspace (sq.m)	6,020	6,042

Key Frontage

	2009			2016			2009 to 2016	
	Total	Retail	Non Retail	**Total**	Retail	Non Retail	Retail	Non Retail
Units (no.)	**27**	19	8	**27**	18	9	-5%	13%
Frontage Lengths (m)	**241**	153	87	**240**	132	108	-14%	24%
Floorspace (sq.m.)	**2,221**	1,453	768	**2,243**	1,385	858	-5%	12%

Non-Key Frontage

	2009			2016			2009 to 2016	
	Total	Retail	Non Retail	**Total**	Retail	Non Retail	Retail	Non Retail
Units (no.)	**34**	9	25	**32**	13	19	44%	-24%
Frontage Lengths (m)	**359**	96	263	**355**	127	228	33%	-13%
Floorspace (sq.m.)	**3,616**	2,095	1,521	**3,462**	2,340	1,122	12%	-26%

All Occupied Frontage

	2009			2016			2009 to 2016	
	Total	Retail	Non Retail	**Total**	Retail	Non Retail	Retail	Non Retail
Units (no.)	**61**	28	33	**59**	31	28	11%	-15%
Frontage Lengths (m)	**599**	249	350	**595**	259	336	4%	-4%
Floorspace (sq.m.)	**5,837**	3,548	2,289	**5,705**	3,725	1,980	5%	-13%

Vacant Frontage

	2009	2016
Units (no.)	5	7
Frontage Lengths (m)	27.1	31
Floorspace (sq.m.)	183	337

A5 Waltham Abbey

	2009	2015
Total units (no.)	71	71
Total Frontage Length (m)	702	702
Total Floorspace (sq.m)	7,420	7,640

Key Frontage

	2009			2013			2009 to 2013	
	Total	Retail	Non Retail	**Total**	Retail	Non Retail	Retail	Non Retail
Units (no.)	**29**	25	4	**30**	24	6	-4%	50%
Frontage Lengths (m)	**222**	180	42	**214**	169	45	-6%	8%
Floorspace (sq.m.)	**3,300**	2,830	470	**3,520**	2,840	680	0%	45%

Non-Key Frontage

	2009			2013			2009 to 2013	
	Total	Retail	Non Retail	**Total**	Retail	Non Retail	Retail	Non Retail
Units (no.)	**39**	14	25	**38**	13	25	-7%	0%
Frontage Lengths (m)	**465**	79	386	**462**	79	383	-1%	-1%
Floorspace (sq.m.)	**4,050**	950	3,100	**3,980**	840	3,140	-12%	1%

All Occupied Frontage

	2009			2013			2009 to 2013	
	Total	Retail	Non Retail	**Total**	Retail	Non Retail	Retail	Non Retail
Units (no.)	**68**	39	29	**68**	37	31	-5%	7%
Frontage Lengths (m)	**687**	259	428	**676**	247	428	-5%	0%
Floorspace (sq.m.)	**7,350**	3,780	3,570	**7,500**	3,680	3,820	-3%	7%

Vacant Frontage

	2009	2013
Units (no.)	3	3
Frontage Lengths (m)	15.3	26
Floorspace (sq.m.)	70	140

A6 Loughton Broadway

	2009	2015
Total units (no.)	69	69
Total Frontage Length (m)	582	582
Total Floorspace (sq.m)	11,410	11,070

Key Frontage

	2009			2015			2009 to 2015	
	Total	Retail	Non Retail	**Total**	Retail	Non Retail	Retail	Non Retail
Units (no.)	**40**	37	3	**38**	30	8	-19%	167%
Frontage Lengths (m)	**322**	294	28	**305**	239	66	-19%	137%
Floorspace (sq.m.)	**6,600**	6,120	480	**6,260**	5,070	1,190	-17%	148%

Non-Key Frontage

	2009			2015			2009 to 2015	
	Total	Retail	Non Retail	**Total**	Retail	Non Retail	Retail	Non Retail
Units (no.)	**28**	14	14	**19**	10	9	-29%	-36%
Frontage Lengths (m)	**250**	123	127	**136**	77	59	-38%	-53%
Floorspace (sq.m.)	**4,710**	2,790	1,920	**3,620**	2,370	1,250	-15%	-35%

All Occupied Frontage

	2009			2015			2009 to 2015	
	Total	Retail	Non Retail	**Total**	Retail	Non Retail	Retail	Non Retail
Units (no.)	**68**	51	17	**57**	40	17	-22%	0%
Frontage Lengths (m)	**571**	417	155	**441**	315	125	-24%	-19%
Floorspace (sq.m.)	**11,310**	8,910	2,400	**9,880**	7,440	2,440	-16%	2%

Vacant Frontage

	2009	2015
Units (no.)	1	12
Frontage Lengths (m)	10.5	141
Floorspace (sq.m.)	100	1,190

Appendix B

Key and Non-Key Frontage

B1 Summary of Key /Non-Key Frontages

B1.1 Summary of Key Frontage make-up

USE CLASSES	Epping	Loughton High Road	Buckhurst Hill	Chipping Ongar	Waltham Abbey	Loughton Broadway
Current Retail %	71	69	65	51	64	71
Non-retail %	29	31	45	49	36	29

Source: Council Monitoring Surveys 2013-2016, as amended (see Section 4.2.1)

B1.2 Summary of Non-Key Frontage make-up

USE CLASSES	Epping	Loughton High Road	Buckhurst Hill	Chipping Ongar	Waltham Abbey	Loughton Broadway
Current Retail %	27	37	31	29	20	30
Non-retail %	73	63	69	71	80	70

Source: Council Monitoring Surveys 2013-2016, as amended (see Section 4.2.1)

B2 Epping Frontages make-up

	Key Frontage	Non-Key Frontage	TOTAL
No of units (No.)	100	95	195
Length of frontage (m)	717.4	1039.9	1757.3
No of A1 units (no.)	73	27	100
Length of A1 units (m)	509.8	284.8	794.6
% A1 in frontage	71%	27%	45%
No of A2-A5 units (no.)	23	38	61
Length of A2-A5 units (m)	173	338.8	511.8
% A2-5 in frontage	24%	33%	29%
No of other units (no.)	3	25	28
Length of other units (m)	25.1	378.3	403.4
% other in frontage	3%	36%	23%
No of vacant units (no.)	1	5	6
Length of vacant units (m)	9.5	38	47.5
% vacant in frontage	1%	4%	3%

Source: Council Monitoring Survey 2015, as amended (see Section 4.2.1)

B3 Loughton High Road Frontages make-up

	Key Frontage	Non-Key Frontage	TOTAL
No of units (No.)	141	97	238
Length of frontage (m)	1068.7	1348.9	2417.6
No of A1 units (no.)	98	36	134
Length of A1 units (m)	740.8	499.4	1240.2
% A1 in frontage	69%	37%	51%
No of A2-A5 units (no.)	34	32	66
Length of A2-A5 units (m)	283.4	406.2	689.6
% A2-5 in frontage	27%	30%	29%
No of other units (no.)	6	27	33
Length of other units (m)	27.1	420.4	447.5
% other in frontage	3%	31%	19%
No of vacant units (no.)	3	2	5
Length of vacant units (m)	17.4	22.9	40.3
% vacant in frontage	2%	2%	2%

Source: Council Monitoring Survey 2015, as amended (see Section 4.2.1)

B4 Buckhurst Hill Frontages make-up

	Key Frontage	Non-Key Frontage	TOTAL
No of units (No.)	42	35	77
Length of frontage (m)	298.1	247	545.1
No of A1 units (no.)	24	14	38
Length of A1 units (m)	194.6	77.1	271.7
% A1 in frontage	65%	31%	50%
No of A2-A5 units (no.)	11	11	22
Length of A2-A5 units (m)	70	91.4	161.4
% A2-5 in frontage	23%	37%	30%
No of other units (no.)	5	9	14
Length of other units (m)	29.9	74.8	104.7
% other in frontage	10%	30%	19%
No of vacant units (no.)	2	1	3
Length of vacant units (m)	3.6	3.7	7.3
% vacant in frontage	1%	1%	1%

Source: Council Monitoring Survey 2015, as amended (see Section 4.2.1)

B5 Chipping Ongar Frontages make-up

	Key Frontage	Non-Key Frontage	TOTAL
No of units (No.)	36	89	125
Length of frontage (m)	299.5	820.6	1120.1
No of A1 units (no.)	19	27	46
Length of A1 units (m)	152.2	236.3	388.5
% A1 in frontage	51%	29%	35%
No of A2-A5 units (no.)	11	12	23
Length of A2-A5 units (m)	79.6	127.1	206.7
% A2-5 in frontage	27%	15%	18%
No of other units (no.)	5	44	49
Length of other units (m)	63.2	427.7	490.9
% other in frontage	21%	52%	44%
No of vacant units (no.)	1	6	7
Length of vacant units (m)	4.5	29.5	34
% vacant in frontage	2%	4%	3%

Source: Council Monitoring Survey 2016, as amended (see Section 4.2.1)

B6 Loughton Broadway Frontages make-up

	Key Frontage	Non-Key Frontage	TOTAL
No of units (No.)	44	22	66
Length of frontage (m)	359.9	274.9	634.8
No of A1 units (no.)	32	11	43
Length of A1 units (m)	255.7	82.5	338.2
% A1 in frontage	71%	30%	53%
No of A2-A5 units (no.)	9	4	13
Length of A2-A5 units (m)	80.4	28.9	109.3
% A2-5 in frontage	22%	11%	17%
No of other units (no.)	1	6	7
Length of other units (m)	7	122.6	129.6
% other in frontage	2%	45%	20%
No of vacant units (no.)	2	1	3
Length of vacant units (m)	16.8	40.9	57.7
% vacant in frontage	5%	15%	9%

Source: Council Monitoring Survey 2015, as amended (see Section 4.2.1)

B7 Waltham Abbey Frontages make-up

	Key Frontage	Non-Key Frontage	TOTAL
No of units (No.)	34	127	161
Length of frontage (m)	256.2	1565	1821.2
No of A1 units (no.)	24	43	67
Length of A1 units (m)	163.2	307.6	470.8
% A1 in frontage	64%	20%	26%
No of A2-A5 units (no.)	6	47	53
Length of A2-A5 units (m)	58.7	739.2	797.9
% A2-5 in frontage	23%	47%	44%
No of other units (no.)	3	30	33
Length of other units (m)	16.6	466.5	483.1
% other in frontage	6%	30%	27%
No of vacant units (no.)	1	7	8
Length of vacant units (m)	17.7	51.7	69.4
% vacant in frontage	7%	3%	4%

Source: Council Monitoring Survey 2013, as amended (see Section 4.2.1)