Topic Paper 7

Primary and Secondary Shopping Frontages within Town Centres

January 2018
1 Introduction

1.1 This paper provides a context and background to policies on primary and secondary retail frontages within Aldershot and Farnborough town centres and North Camp District Centre as set out within the draft submission Rushmoor Local Plan. Divided into several key sections, it first describes Government planning policy on town and retail centres before summarising the key findings and conclusions of the Rushmoor and Hart Retail, Leisure and Town Centres Study (2015), an important evidence study which has informed the town centre policies of the draft Local Plan. After setting out Rushmoor’s policy approach to primary and secondary retail frontages, the paper reviews the recently adopted and planned policies of other local planning authorities on the matter as set out within their local plans.

2 National Policy and Guidance

2.1 Government planning policy related to town and retail centres is set out within the National Planning Policy Framework (2012). According to the Framework, ‘ensuring the vitality of town centres’ is a key aspect of sustainable development. It highlights that ‘planning policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of town centres over the plan period’.¹

2.2 The National Planning Policy Framework (2012) states that, when preparing a new local plan, local planning authorities should:

- 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;
- 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;

- 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, plan positively for their future to encourage economic activity.\footnote{National Planning Policy Framework (2012), para. 23, pp. 7-8.}

2.3 The \textit{National Planning Policy Framework} (2012) requires local planning authorities to ‘apply a sequential test to planning applications for main town centre uses that are not in an existing centre and which are not in accordance with an up-to-date Local Plan’. Whilst edge-of-centre sites must be easily accessible and well connected to the centre, all in-centre options must be assessed before any out-of-centre options can be considered. Moreover, local authorities should assess the impact of out-of-centre retail, leisure and office development proposals on town centres when they exceed a floor space of 2,500 square metres or a locally set floor space threshold.\footnote{National Planning Policy Framework (2012), paras. 24-27, p. 8.}

2.4 \textit{National Planning Practice Guidance} (2014) further states that a positive vision or strategy ‘is key to ensuring successful town centres which enable sustainable economic growth and provide a wide range of social and environmental benefits’.\footnote{National Planning Practice Guidance (2014), para. 002; ref. ID 2b-002-20140306.} It also suggests that strategies ‘should be based on evidence of the current state of town centres and opportunities to meet development needs and support their viability and vitality’. It recommends that strategies should seek to address the following questions:

- What is the appropriate and realistic role, function and hierarchy of town centres in the area over the plan period? This will involve auditing existing centres to assess their role, vitality, viability and potential to accommodate new development and different types of development.
- What is the vision for the future of each town centre? This should consider what the most appropriate mix of uses would be to enhance overall vitality and viability.
- Can the town centre accommodate the scale of assessed need for main town centre uses? This should include considering expanding centres, or development opportunities to enable new development or redevelop existing under-utilised space. It should involve evaluating different policy options (for example, expanding the market share of a particular centre) or the implications of wider policy such as infrastructure delivery and demographic or economic change.
- In what time frame should new retail floor space be provided?
- What complementary strategies are necessary or appropriate to enhance the town centre and help deliver the vision for its future, and how can these be planned and delivered?
2. How can parking provision be enhanced and both parking charges and enforcement be made proportionate in order to encourage town centre vitality?

2.5 National Planning Practice Guidance (2014) notes that strategies ‘should identify changes in the hierarchy of town centres, including where a town centre is in decline’. Moreover, it suggests that the following ‘indicators’ are useful in assessing the health of town centres:

- Diversity of uses;
- Proportion of vacant street level property;
- Commercial yields on non-domestic property;
- Customers’ views and behaviour;
- Retailer representation and intentions to change representation;
- Commercial rents;
- Pedestrian flows;
- Accessibility;
- Perception of safety and occurrence of crime; and
- State of town centre environmental quality.

3 Retail, Leisure and Town Centres Study (2015)

3.1 Rushmoor includes the towns of Aldershot and Farnborough and the settlement of North Camp. The draft submission Rushmoor Local Plan designates Aldershot and Farnborough as the foci for retail development and town centre use within the Borough, whilst North Camp is defined as a district centre that supports local needs.

3.2 The Rushmoor and Hart Retail, Leisure and Town Centres Study (2015) has informed the town centre policies of the draft Local Plan. A significant piece of research, the Study explores the retail, leisure and town centre development needs of Rushmoor and Hart and considers the capacity of the town and district centres to accommodate new development requirements. It also updates the findings of a previous evidence study, the Rushmoor Retail and Leisure Study (2010).

3.3 The Study has a number of key elements. For example, it analyses how shopping patterns have changed since the recession, examines the future need and residual capacity for retail space within Rushmoor and Hart, and considers the potential impact of emerging developments, both within and outside the areas, on the town centres and shopping habits. In Rushmoor, it explores the ‘health’ of Aldershot and Farnborough town centres and North Camp District Centre, ‘reviews the town centre boundaries and frontages’, and ‘appraises retail and leisure development sites within

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7 Rushmoor Borough Council (2017) Rushmoor Local Plan (Draft Submission: June 2017).
and adjacent to the town centres, and their capacity to accommodate identified needs.9

Key Findings and Recommendations

3.4 It is possible to compare the retail offering of town and retail centres using data from the Venuescore UK Shopping Index. An annual survey which scores and ranks more than 3,500 retail centres across the UK, the Index highlights key differences between retail venues, most notably in terms of retail offer and market positioning. The Index scores each centre according to the presence of national retailers: a higher score indicates the presence of a large number of national retailers, or chain stores, which draw visitors and influence shopping patterns. However, whilst a centre’s score takes into account the provision of multiple retailers, it should be noted that it ‘does not necessarily reflect the overall size of a centre or the number of shops’.10 For example, it does not consider the retail offer of a centre that has a large number of independent or specialist retailers.

3.5 The Venuescore UK Shopping Index scores and ranks Aldershot and Farnborough town centres but does not include North Camp District Centre. In 2013, with scores of 73 and 89, Aldershot and Farnborough were ranked 343rd and 265th in the UK respectively.11 However, their Venuescores and ranks have fallen considerably since 2006. In 2006, Aldershot was ranked 248th, and Farnborough, 152nd, with scores of 88 and 125 respectively.12

3.6 As the Retail, Leisure and Town Centres Study (2015) observes, ‘it is clear that there is a downward trend for the main centres in Rushmoor’. It reasons that Aldershot and Farnborough ‘have not kept pace with other centres in the wider area’, noting that others ‘have strengthened and improved their retail offer through investment and development’. It argues that retail centres suffer without investment and that attracting new retailers is key to enabling a centre to improve its score and to compete more effectively with other shopping destinations.13 With this in mind, Aldershot and Farnborough town centres have seen significant investment in recent years. The Westgate development in Aldershot, for example, has improved the evening economy and the convenience food offer within the town with the development of a cinema, restaurants, supermarket and hotel. In Farnborough, the northern part of Queensmead has been redeveloped with the addition of new retail units and a supermarket, and a new cinema has been constructed.

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11 For reference, Reading was ranked 13th (397); Guildford, 33rd (279); Basingstoke, 53rd (225); Camberley, 163rd (135); Farnham, 271st (88); Bracknell, 292nd (84); and Fleet, 338th (74).
3.7 Despite the rise of Internet shopping and the trend towards fewer but larger stores, in-store expenditure in England is forecast to increase by approximately £33 billion over the next ten years and by £72 billion over the next twenty years. As the Study notes, sufficient investment will be required for town centres to capitalise on this growth. It argues that there is scope for centres to diversify, for example, in terms of their leisure and entertainment offer, but that comparison retail will remain the driver of growth in many centres. In Rushmoor, it estimates that total spending on comparison goods – that is, durable goods, including clothing, household, furniture, DIY and electrical goods – will increase by 89.4% between 2014 and 2032 owing to an increase in the local population and in spending per head. It also calculates that spending on convenience goods – that is, food, groceries, cleaning materials and consumer goods that are purchased on a regular basis – will increase by 17.6% between 2014 and 2032.14

3.8 Through an analysis of local population projections, shopping trends, expenditure estimates and growth assumptions with regard to spending per head, the Study has forecast the future capacity requirements for retail and non-retail floor space (classes A1 to A5) within Rushmoor. Using population projections from the Hart, Rushmoor and Surrey Heath Strategic Housing Market Assessment (2014), it predicts that Rushmoor (Aldershot, Farnborough and North Camp combined) will require an additional 33,917 square metres of gross floor space by 2032. As these forecasts relate to Class A1 retail uses and Class A3 to A5 uses, it argues that there is also scope for approximately ten per cent of additional floor space to be occupied by Class A1 non-retail services and Class A2 uses.15 The Study, however, warns that long-term projections are subject to uncertainty and variation and that short-term forecasts are more reliable. In the short to medium term, between 2018 and 2022, it forecasts that Rushmoor will require an additional 331 square metres of gross floor space for convenience retail, another 1,007 square metres of gross comparison retail floor space and an extra 838 square metres of gross food and beverage floor space.16 It also concludes that cinema provision within Rushmoor is sufficient and that theatre, tenpin bowling, bingo and nightclub provision within the Rushmoor and Hart area is adequate. However, it suggests that there is scope for another health and fitness club in Rushmoor.17

3.9 According to the Study, there are a number of ways that Rushmoor can maintain and enhance the role of its retail centres. For example, it highlights the significance of the requirement of the National Planning Policy Framework (2012) that local planning authorities carry out a sequential test and impact assessment when

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determining a planning application for a main town centre use that is not within a centre in order to evaluate the potential effect of the proposal on the centre.\textsuperscript{18} Whilst the \textit{National Planning Policy Framework} (2012) suggests a threshold of 2,500 square metres, the \textit{Study} recommends that retail, leisure and town centre developments over 1,000 square metres gross located outside Aldershot and Farnborough town centres should be required to prepare an impact assessment. It reduces the recommended threshold to 250 square metres gross if a proposed development is situated within one kilometre of North Camp.\textsuperscript{19} In addition, it suggests that Rushmoor:

- Improves the range and choice of shops and services in all centres (where appropriate in terms of scale) by encouraging intensification, development and the re-occupation of vacant premises, and by continuing to promote the centres;
- Maintains, or improves where necessary, the generally high-quality environment within each centre; and
- Brings forward development opportunities through the \textit{Local Plan} process to improve the availability of modern premises suitable for new occupiers.\textsuperscript{20}

3.10 Reviewing the role, vitality and viability of Aldershot, Farnborough and North Camp and their potential to accommodate new and different forms of development, the \textit{Study} makes a number of recommendations for each retail centre. For example, it suggests that Aldershot Town Centre should ‘consolidate its role within the wider shopping hierarchy’, aim ‘to compete more effectively’ with the similarly sized and competing centres of Farnborough, Farnham and Fleet, and that the town ‘should be the main focus for large-scale retail and leisure development’ in the south of Rushmoor. Noting that Aldershot has a high shop vacancy rate (23.6\% compared to the national average of 12.1\%), it argues that vacant units could accommodate future growth within the town. However, because the vast majority of vacant floor space is located within the Galleries and the Arcade and many other vacant units are small or sited in secondary locations, it recommends that a proportion of space could be re-occupied by non-A1 retail uses.\textsuperscript{21} Excluding these two locations, the vacancy rate is very similar to the national average at 11.7\%; the draft \textit{Local Plan} includes Policy SP1.4, which states that the Council ‘will work with developers to achieve a comprehensive redevelopment’ of the Galleries as part of the regeneration of the town centre.\textsuperscript{22}

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\textsuperscript{22} This vacancy rate has been calculated using the Council’s retail occupancy data from October 2015. Rushmoor Borough Council (2017) \textit{Rushmoor Local Plan} (Draft Submission: June 2017), ‘Policy SP1.4: The Galleries’, pp. 49-50.
\end{flushleft}
3.11 As with Aldershot, the Study suggests that Farnborough Town Centre ‘should seek to compete more effectively’ with competing towns. It argues that vacant premises should be able to accommodate a proportion of future growth within the town. For example, it claims that six units would be able to accommodate approximately 1,200 square metres gross of floor space if unit vacancy levels fall from their current rate of 11.9% to 8%, the pre-recession average. In terms of North Camp, the Study advises that the centre ‘should continue to serve its local area for day-to-day shopping, local services and basic lower order comparison shopping’ and that the priority there should be ‘the re-occupation of vacant shop units and small in-fill developments or extensions’. It observes that five re-occupied units could accommodate about 1,000 square metres of gross floor space if the current unit vacancy rate of 12.1% were to fall to 8%, which would accommodate the overall A1 to A5 floor space projection for the centre to 2032.

3.12 Unit vacancy rates in Aldershot (excluding the Galleries), Farnborough and North Camp are comparable to the national average and are broadly in line with, or close to, other similarly sized local centres. For example, the unit vacancy rate in Fleet is 13%, in Addlestone is 11.4%, in Wokingham is 9.6%, and in Farnham is 9%; in the larger centres of Basingstoke and Guildford, the unit vacancy rates are 12.7% and 13% respectively. Vacancy levels are a key performance indicator for assessing the health of centres but should be treated with caution. As the Runnymede Town and Local Centres Study observes, there is ‘a natural “churn” of units closing and opening in centres at any one time’. In addition, whilst low vacancy rates are often ‘interpreted as a sign that a centre is performing strongly, it may also mask the fact that there is a limited supply of floor space to meet the needs of retailers and businesses seeking representation in the town centre’.

3.13 Defined by the Town and Country Planning (Use Classes) Order 1987 (as amended), use classifications are summarised in the table below.

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**Use Class** | **Use**
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A1 | Shops, retail warehouses, post offices, ticket and travel agencies, sale of cold food for consumption off premises, hairdressers, funeral directors, hire shops, dry cleaners and Internet cafés.
A2 | Financial and professional services, including banks, building societies, and estate and employment agencies (not health or medical services)
A3 | Restaurants and cafés
A4 | Drinking establishments
A5 | Hot food and takeaways

### Other Uses

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B1 | Offices (other than a use falling within Class A2), research and development, and light industrial
B2 | Industrial (other than a use falling within Class B1)
B8 | Storage or distribution centre
C1 | Hotels, boarding and guest houses
C2 | Residential institutions
C2A | Secure residential institutions
C3 | Dwelling houses
C4 | Houses in multiple occupation
D1 | Non-residential institutions
D2 | Assembly and leisure uses
Sui Generis | Any planning use which does not fall into the specified use classes above (including betting offices and pay-day loan shops)

### 4 Primary and Secondary Frontages

#### Designation in Rushmoor

4.1 As noted above, local planning authorities, when preparing a new local plan, are required ‘to define the extent of town centres and primary shopping areas, based upon a clear definition of primary and secondary frontages in designated centres, and set policies which make clear which uses will be permitted in such locations’.

According to the *National Planning Policy Framework* (2012), a ‘town centre’ includes ‘the primary shopping area and areas predominantly occupied by main town centre uses’, whilst a ‘primary shopping area’ is a ‘defined area where retail development is concentrated’. With regard to retail frontages, the *Framework* notes that ‘primary frontages’ are ‘likely to include a high proportion of retail uses, which may include food, drinks, clothing and household goods’. In comparison, ‘secondary

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frontages provide greater opportunities for a diversity of uses, such as restaurants, cinemas and businesses’.  

4.2 Whilst the National Planning Policy Framework (2012) provides little guidance on how to identify primary shopping areas and frontages, a number of factors can be explored to identify their extent, including composition of uses, rental levels and pedestrian flows. For example, primary frontages generally include a higher proportion of A1 uses, achieve higher rental levels, and have higher pedestrian flows than secondary frontages. The presence of anchor stores, such as supermarkets and department stores, can also point to the extent of a primary shopping area and frontages.

4.3 Based upon the evidence set out within the Retail, Leisure and Town Centres Study (2015), the draft Rushmoor Local Plan has identified the primary shopping areas of Aldershot, Farnborough and North Camp and the primary and secondary shopping frontages for each centre. In Aldershot, the primary shopping area is located within the area bounded by High Street, Victoria Road, Station Road and Grosvenor Road. According to the Study, ‘the main shopping circuit is through the Wellington Centre, Union Street (east side) and the north part of Wellington Street’. This area has ‘a predominance of Class A1 use’ and high footfalls and is designated as the primary shopping frontage within the Local Plan. The primary retail frontages within Aldershot are therefore defined as units within:

- The Wellington Centre (Low Walk and High Walk);
- Wellington Street (1-13, plus units in the Wellington Centre with street frontage on to Wellington Street, and 2a-18); and
- Union Street (29-49 and 38-62).

The Study also identifies a large number of vacant units within the Arcade, the Galleries and in the southern part of Wellington Street, and a high concentration of non-A1 Class uses in the western part of Union Street. From these observations, the draft Local Plan defines secondary shopping frontages as units within:

- Union Street (1-27 and 2b-36), Grosvenor Road (4-16) and Upper Union Street (2-10);
- Wellington Street (20-30 and 27-37), Victoria Road (101-149 and 116-132) and the Arcade;
- High Street (1-57 and 59-79); and
- The Galleries redevelopment.

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32 Rushmoor Borough Council (2017) Rushmoor Local Plan (Draft Submission: June 2017), p. 45.
33 Rushmoor Borough Council (2017) Rushmoor Local Plan (Draft Submission: June 2017), p. 46.
4.4 In Farnborough, the primary shopping area includes Princes Mead, Asda, the Meads, Sainsbury’s, Queensmead and Kingsmead. According to the *Retail, Leisure and Town Centres Study* (2015), Princes Mead, the Meads and north Queensmead attract the highest footfalls and are the ‘main focus for Class A1 uses, larger shop units and multiple retailers’. The draft *Local Plan* therefore designates the following units as primary shopping frontages:

- Queensmead (61-71 and 60-76);
- The Meads, including the unit occupied by Sainsbury’s; and
- Princes Mead and the unit occupied by Asda.

With future development in the town centre in mind, additional primary frontage is allocated at Block 4 in northern Queensmead and the Kingsmead extension. Owing to a high proportion of vacant units and non-retail uses, the following units are defined as secondary shopping frontages:

- Kingsmead;
- Queensmead (73-93 and 78-98) and Briarcliff House (93-99); and
- Victoria Road (14-48) and Firgrove Parade (1-5).

4.5 The draft *Local Plan* defines the primary frontage in North Camp as units in Camp Road (1-79 and 2-48) and Lynchford Road (81 and 83), and the secondary frontage as units in Queens Road (3-11) and Lynchford Road (51-79, 85-107).

4.6 Comparing postal addresses and Ordnance Survey maps with the property numbers listed within the supporting text to the primary and secondary frontage policies, a few discrepancies related to the property numbers have been identified. To ensure that the defined frontages accurately reflect the postal addresses, a small number of minor modifications are proposed to address these discrepancies.

4.7 The Council monitors the mix of uses and the number of vacant units within Aldershot and Farnborough town centres and North Camp District Centre. As such, the latest monitoring information for the centres, as of October and December 2017, is set out within Appendix A.

**Rushmoor Local Plan Policies**

4.8 Frontage designations are an important means for ensuring that retail uses within town centres are safeguarded and can flourish. Though the *National Planning Policy Framework* (2012) does not provide guidance on the proportion of retail and non-retail uses within frontages, designations should promote the vitality and viability of

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town centres and provide high-quality and accessible retail services which meet the needs of consumers.

4.9 As noted above, primary frontages tend to be characterised by a high proportion of retail uses, whilst secondary frontages generally support a more diverse range of uses, for example, restaurants and betting offices, in addition to retail. Because non-retail uses, like banks and building societies, may not have window displays, and restaurants and takeways may only open during the evening, thereby creating inactive, or dead, frontages, it is preferable that primary frontages include a higher proportion of retail uses in order to maintain an active frontage during the day. Indeed, as Taunton Deane Borough Council highlights, ‘an over-proliferation of non-retail uses can seriously fragment shopping frontages, damage pedestrian circulation, undermine the scale of retail activity and ultimately change the character of a shopping centre, and therefore undermine the vitality and viability of a town centre’. However, as it also observes, frontage designations should allow for a degree of flexibility, as non-retail uses can provide ‘a variety of uses to support the core retail function’.38

4.10 Also of significance, the National Planning Policy Framework (2012) requires local planning authorities to:

- Plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;
- Guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs; and
- Ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community.39

4.11 Rushmoor’s policy approach to primary and secondary retail frontages in Aldershot, Farnborough and North Camp, as set out within the draft Local Plan, is intended to address concerns regarding non-retail uses and inactive frontages whilst also providing a degree of flexibility and satisfying the requirements of the National Planning Policy Framework (2012). The policies contain a number of common elements and requirements and define the proportion of retail and non-retail uses that primary and secondary shopping frontages in each centre should contain. For example, a proposal for a change of use of units to non-retail usage within Rushmoor’s primary and secondary shopping frontages will only be permitted if:

- It maintains or enhances the centre’s vitality and viability;

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• There is no material adverse impact upon the appearance of the premises; and
• There is no material adverse impact upon the amenities of nearby residential uses.

Moreover, development will only be acceptable within the primary frontages if:

• It is for a use falling within Class A1, A2, A3, A4 or A5 and retains an active frontage; and
• It would not result in the loss of an A1 unit frontage on a visually prominent site.

Within the secondary frontages, a proposal must satisfy the following criteria:

• It is for a town centre use which retains an active frontage; and
• In each frontage, no more than 5% of the units will be betting shops and no betting shop is located within 400 metres of the proposal site.

In North Camp, betting or pay-day loan shops should form no more than 5% of the units within each secondary frontage, and no betting or pay-day loan shop should be located within 400 metres of a proposal site.

4.12 In Aldershot, the proportion of non-A1 units in the primary frontage should not exceed 25% in the Wellington Centre, and 30% on the relevant parts of Union Street and Wellington Street. In Farnborough the upper limit for non-A1 units within each primary frontage is 20%. Whilst in North Camp, reflecting its role as a District Centre, the limit is set at 40%.

4.13 The policy approach for secondary shopping frontages allows for a more diverse mix of uses and provides for lower levels of retail usage. In Aldershot and North Camp, for example, the number of non-A1 units should not exceed 50%. However, to allow for greater flexibility, the policy approach in Aldershot permits this upper limit to be exceeded if A1 usage is no longer considered to be viable and a property has been marketed for retail use for a minimum of 12 months. In Farnborough, the percentage criterion reflects the role of each secondary frontage and the existing mix of uses in each location. In Kingsmead, for example, a change of use from Class A1 should not result in the number of non-A1 units exceeding 50%, unless a proposal is for a restaurant or café use (Class A3); this is intended to facilitate the development of an evening economy in support of the cinema. In the Queensmead and Briarcliff House shopping frontage, non-A1 units should not exceed 50%. There is no percentage criterion for retail and non-retail uses for the secondary frontages at Victoria Road and Firgrove Parade, however, as they currently contain a high number of non-retail uses.

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40 Rushmoor Borough Council (2017) Rushmoor Local Plan (Draft Submission: June 2017), ‘Policy SP1.1: Primary Frontages in Aldershot Town Centre’, p. 46; ‘Policy SP1.2: Secondary Frontages in Aldershot Town Centre’, p. 47; ‘Policy SP2.1: Primary Frontages in Farnborough Town Centre’, p. 61; ‘Policy SP2.2: Secondary Frontages in...
Permitted Development Rights

4.14 It is important to note that some changes of use within town centres do not require planning permission. The *Town and Country Planning (General Permitted Development) (England) Order 2015* (as amended) sets out permitted development rights which allow for the change of use of buildings from shops (Class A1) to other uses without the need for planning consent. For example, Class C of Part 3 of Schedule 2 permits the change of use of a building falling within Class A1 to a use falling within Class A3 (restaurants and cafés), and Class D allows for the change of use from Class A1 to A2 (financial and professional services). In addition, Class J permits the change of use from Class A1 to D2 (assembly and leisure), whilst Class M authorises the change of use of a building from a use falling within Class A1 to C3 (dwelling houses). However, whilst development under Class D is not subject to any conditions, classes C and M stipulate that the cumulative floor space of a building must not exceed 150 square metres and that no more than 150 square metres of floor space is able to change use. Class J specifies that the cumulative floor space of a building must not exceed 200 square metres, and no more than 200 square metres of floor space is able to change use. Moreover, classes C, J and M require developers to apply to a local planning authority for prior approval; the prior approval process allows a local authority to refuse permission if it believes that the change of use from Class A1 is ‘undesirable’ owing to its impact:

- On adequate provision of services of the sort that may be provided by a building falling within Class A1 (shops) ... but only where there is a reasonable prospect of the building being used to provide such services; or
- Where the building is located in a key shopping area, on the sustainability of that shopping area.\(^{41}\)

5 A Review of Shopping Frontage Policies of Other Local Authorities

5.1 An examination of the pre-submission and recently adopted local plans of other local authorities reveals a raft of similar responses to retail and non-retail use within shopping frontages. Fifteen local plans were examined, and all have specific policies on primary and secondary retail frontages.

5.2 Of the fifteen local plans examined, eight have set percentage criteria for retail and non-retail uses within primary frontages, whilst four have thresholds for secondary frontages, reflecting a more flexible approach to the type and mix of uses permitted within secondary frontages. The percentage threshold for non-retail uses ranges

5.3 Maintaining an active and vibrant centre is of paramount concern. To reduce the impact of dead frontages, a number of local authorities include policies to avoid an over-concentration of non-retail uses within certain areas of a centre or along certain frontages. Stroud District Council, for example, states that the change of use from retail at ground floor level to other uses within Class A in the primary retail frontage ‘will be acceptable where non-A1 retail units do not exceed 30% of total frontage length 50 metres either side from the application site edges’.42 Teignbridge District Council similarly states that development will not be permitted in the primary shopping frontage which would ‘create three or more adjoining ground floor units in uses other than A1 retail’; this is increased to six continuous properties within the secondary frontage.43

5.4 Several local authorities highlight the significance of maintaining the ‘character’ of the shopping area within their frontage policies. For example, Arun District Council, Gosport Borough Council and Petersfield Town Council require proposals for all non-retail uses within primary and secondary frontages to maintain a shop window display. In addition to a window display, Taunton Deane Borough Council suggests that any proposal for a non-retail use within the primary frontage should generate ‘footfall at least equal to Class A1 use’, be open during normal shop hours, and demonstrate its ‘overall benefit to the vitality and viability’ of the frontage. With food and drink premises in mind, Arun also states that proposals should have no detrimental effect on an area’s character or amenities ‘through smell, litter or noise’.44

Key Issues from Representations on Primary and Secondary Shopping Frontage Policies

5.5 Representations from London and Cambridge Properties object to the wording of Policy SP1.1 (Primary Frontages in Aldershot). The objector considers that the policy should provide greater flexibility for change of use to non-A1 use where units have been vacant or marketed for a significant time and that the criterion for a percentage of units to be in A1 use should be deleted.

5.6 In response, the Council points out that the *Rushmoor Retail, Leisure and Town Centres Study* (2015) examines retail frontages within Aldershot Town Centre and sets out recommendations for the designation of primary and secondary frontages. The *Study* highlights that more than half of the vacant units and two-thirds of the vacant floorspace are located within the Galleries and the Arcade. Excluding these two sites, which are allocated for redevelopment, significantly reduces the vacancy rate of Aldershot Town Centre to a level which is more similar to the national average. The Council therefore considers that greater flexibility for non-retail uses in the primary shopping frontage is not justified by vacancy rates.

5.7 However, a more flexible approach has been applied to the secondary shopping frontage within Aldershot Town Centre (Policy SP1.2). This allows for an extremely flexible approach where the retail use is considered to be no longer viable and where there is evidence of effective marketing.

5.8 The Council does not accept the suggestion that reference to a percentage of non-A1 uses in the primary shopping frontage should be deleted. The Council considers that it is important to include a percentage threshold within its shopping frontage policies to ensure that non-retail uses do not become overly dominant. Percentage thresholds allow for an appropriate and balanced mix of uses and are a vital tool in maintaining the vibrancy of centres, as set out within this topic paper.

5.9 Representations from Shaviram argue that policies SP1.1, SP1.2 and SP1.4 should be less prescriptive for proposals delivering comprehensive development and regeneration and that 12-20 Wellington Street should form part of the secondary shopping frontage. The *Rushmoor Retail, Leisure and Town Centres Study* (Part 2, 2015) examines retail frontages within Aldershot Town Centre and sets out recommendations for the designation of primary and secondary frontages. The designation of 12-18 Wellington Street as primary shopping frontage reflects the recommendations of this study. The redevelopment of the Galleries is considered to be critical to the regeneration of Aldershot Town Centre, and the re-provision of A1 uses within this location, which ‘forms part of the main shopping circuit’, as set out within the *Rushmoor Retail, Leisure and Town Centre Study* (Part 2, 2015), will help to support a vibrant town centre. The Council has already taken a very flexible approach to the site allocation policy for the Galleries (Policy SP1.4), which designates the majority of the ground floor as part of the secondary shopping frontage and allows for the loss of the first-floor retail units. The Council considers that appropriate flexibility has been provided in the draft *Local Plan*, and the suggestion to add a criterion which would allow for a more flexible approach to proposals delivering a comprehensive redevelopment and regeneration benefit is therefore not accepted.
6 Conclusion

6.1 The Council believes that it is important to define primary and secondary shopping frontages and to include a percentage threshold within its shopping frontage policies to ensure that non-retail uses do not become overly dominant. Percentage thresholds allow for an appropriate and balanced mix of uses and are a vital tool in maintaining the vibrancy of centres.

6.2 Rushmoor’s proposed shopping frontage policies will help to encourage active and vibrant centres. The policies support and aim to bolster the retail function of the Borough’s primary shopping areas but also allow for a mix of uses. As the National Planning Policy Framework (2012) observes, primary frontages tend ‘to include a high proportion of retail uses’, whilst secondary frontages ‘provide greater opportunities for a diversity of uses’.45 The Local Plan’s primary and secondary frontage policies reflect this approach, and the retail and non-retail percentage thresholds proposed are considered appropriate to support healthy town centres.

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Appendix A

Town Centre Monitoring Data

Aldershot Town Centre (October 2017)

<table>
<thead>
<tr>
<th>Frontage</th>
<th>Frontage</th>
<th>Policy Percentage (non-A1)</th>
<th>Total Number of Units</th>
<th>Total Number of A1 Uses</th>
<th>Total Number of Non-A1 Uses</th>
<th>Percentage of A1 Uses</th>
<th>Percentage of Non-A1 Uses</th>
<th>Number of Vacant Units</th>
<th>Percentage Vacant</th>
</tr>
</thead>
<tbody>
<tr>
<td>Primary Frontage (Policy SP1.1)</td>
<td>Union Street (29-49, 38-62)</td>
<td>30%</td>
<td>18</td>
<td>14</td>
<td>4</td>
<td>78%</td>
<td>22%</td>
<td>6</td>
<td>33%</td>
</tr>
<tr>
<td>Wellington Centre</td>
<td></td>
<td>25%</td>
<td>33</td>
<td>26</td>
<td>7</td>
<td>79%</td>
<td>21%</td>
<td>3</td>
<td>9%</td>
</tr>
<tr>
<td>Frontage</td>
<td>Frontage</td>
<td>Policy Percentage (non-A1)</td>
<td>Total Number of Units</td>
<td>Total Number of A1 Uses</td>
<td>Total Number of Non-A1 Uses</td>
<td>Percentage of A1 Uses</td>
<td>Percentage of Non-A1 Uses</td>
<td>Number of Vacant Units</td>
<td>Percentage Vacant</td>
</tr>
<tr>
<td>--------------------------------</td>
<td>--------------------------------</td>
<td>----------------------------</td>
<td>-----------------------</td>
<td>-------------------------</td>
<td>-----------------------------</td>
<td>-----------------------</td>
<td>--------------------------</td>
<td>-------------------------</td>
<td>----------------------</td>
</tr>
<tr>
<td>Wellington Street</td>
<td>Wellington Street (1-13, 2a-18, and Units in the Wellington Centre with Street Frontage on to Wellington Street)</td>
<td>30%</td>
<td>15</td>
<td>9</td>
<td>6</td>
<td>60%</td>
<td>40%</td>
<td>1</td>
<td>7%</td>
</tr>
<tr>
<td>Secondary Frontage (Policy SP1.2)</td>
<td>The Galleries</td>
<td>50% (unless A1 use is no longer considered viable and there is evidence of effective marketing for a period of at least 12 months)</td>
<td>21</td>
<td>20</td>
<td>1</td>
<td>95%</td>
<td>5%</td>
<td>21</td>
<td>100%</td>
</tr>
<tr>
<td></td>
<td>High Street (1-57, 59-79)</td>
<td></td>
<td>28</td>
<td>14</td>
<td>14</td>
<td>50%</td>
<td>50%</td>
<td>8</td>
<td>29%</td>
</tr>
</tbody>
</table>
### Draft Submission Rushmoor Local Plan: January 2018

**Topic Paper 7: Primary and Secondary Shopping Frontages within Town Centres**

<table>
<thead>
<tr>
<th>Frontage</th>
<th>Policy Percentage (non-A1)</th>
<th>Total Number of Units</th>
<th>Total Number of A1 Uses</th>
<th>Total Number of Non-A1 Uses</th>
<th>Percentage of A1 Uses</th>
<th>Percentage of Non-A1 Uses</th>
<th>Number of Vacant Units</th>
<th>Percentage Vacant</th>
</tr>
</thead>
<tbody>
<tr>
<td>Union Street (1-27, 2b-36), Grosvenor Road (4-16), Upper Union Street (2-10)</td>
<td></td>
<td>28</td>
<td>16</td>
<td>12</td>
<td>61%</td>
<td>39%</td>
<td>7</td>
<td>25%</td>
</tr>
<tr>
<td>Wellington Street (20-30, 27-37), Victoria Road (101-149, 116-132), The Arcade</td>
<td></td>
<td>46</td>
<td>23</td>
<td>23</td>
<td>50%</td>
<td>50%</td>
<td>3</td>
<td>7%</td>
</tr>
</tbody>
</table>
### Farnborough Town Centre (October 2017)

<table>
<thead>
<tr>
<th>Frontage</th>
<th>Frontage</th>
<th>Policy Percentage (non-A1)</th>
<th>Total Number of Units</th>
<th>Total Number of A1 Uses</th>
<th>Total Number of Non-A1 Uses</th>
<th>Percentage of A1 Uses</th>
<th>Percentage of Non-A1 Uses</th>
<th>Number of Vacant Units</th>
<th>Percentage Vacant</th>
</tr>
</thead>
<tbody>
<tr>
<td>Primary Frontage (Policy SP2.1)</td>
<td>Prince's Mead, including the unit occupied by Asda</td>
<td>20%</td>
<td>33</td>
<td>30</td>
<td>3</td>
<td>91%</td>
<td>9%</td>
<td>5</td>
<td>15%</td>
</tr>
<tr>
<td></td>
<td>Queensmead (61-71, 60-76) and The Meads, including the Unit Occupied by Sainsbury's</td>
<td></td>
<td>29</td>
<td>23</td>
<td>6</td>
<td>79%</td>
<td>21%</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td>Frontage</td>
<td>Frontage</td>
<td>Policy Percentage (non-A1)</td>
<td>Total Number of Units</td>
<td>Total Number of A1 Uses</td>
<td>Total Number of Non-A1 Uses</td>
<td>Percentage of A1 Uses</td>
<td>Percentage of Non-A1 Uses</td>
<td>Number of Vacant Units</td>
<td>Percentage Vacant</td>
</tr>
<tr>
<td>----------</td>
<td>----------</td>
<td>-----------------------------</td>
<td>-----------------------</td>
<td>-------------------------</td>
<td>-----------------------------</td>
<td>----------------------</td>
<td>------------------------</td>
<td>-----------------------</td>
<td>-----------------</td>
</tr>
<tr>
<td></td>
<td>Kingsmead</td>
<td>50% (unless the proposed use is A3)</td>
<td>22</td>
<td>13</td>
<td>9</td>
<td>59%</td>
<td>41%</td>
<td>7</td>
<td>32%</td>
</tr>
<tr>
<td></td>
<td>Queensmead (73-93, 78-98) and Briarcliff House (93-99)</td>
<td>50%</td>
<td>24</td>
<td>11</td>
<td>13</td>
<td>46%</td>
<td>54%</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td></td>
<td>Victoria Road (14-48) and Figrove Parade (1-5)</td>
<td>No percentage policy</td>
<td>14</td>
<td>2</td>
<td>12</td>
<td>14%</td>
<td>86%</td>
<td>1</td>
<td>7%</td>
</tr>
</tbody>
</table>
## North Camp District Centre (December 2017)

<table>
<thead>
<tr>
<th>Frontage</th>
<th>Frontage</th>
<th>Policy Percentage (non-A1)</th>
<th>Total Number of Units</th>
<th>Total Number of A1 Uses</th>
<th>Total Number of Non-A1 Uses</th>
<th>Percentage of A1 Uses</th>
<th>Percentage of Non-A1 Uses</th>
<th>Number of Vacant Units</th>
<th>Percentage Vacant</th>
</tr>
</thead>
<tbody>
<tr>
<td>Primary Frontage (Policy SP3.1)</td>
<td>Camp Road (1-79, 2-48) and Lynchford Road (81, 83)</td>
<td>40%</td>
<td>51</td>
<td>35</td>
<td>16</td>
<td>69%</td>
<td>31%</td>
<td>7</td>
<td>14%</td>
</tr>
<tr>
<td>Secondary Frontage (Policy SP3.2)</td>
<td>Lynchford Road (51-79, 85-107)</td>
<td>50%</td>
<td>22</td>
<td>10</td>
<td>12</td>
<td>45%</td>
<td>55%</td>
<td>2</td>
<td>9%</td>
</tr>
<tr>
<td></td>
<td>Queens Road (3-11)</td>
<td>50%</td>
<td>6</td>
<td>2</td>
<td>4</td>
<td>33%</td>
<td>67%</td>
<td>1</td>
<td>17%</td>
</tr>
</tbody>
</table>