

Henry Pankhurst,
Harrogate Civic Society,
38, St. Clements Road,
Harrogate,
North Yorks. HG2 8LX

26th September 2018

Planning & Development,
For the attention of Mark Williams,
Harrogate Borough Council,
P.O. Box 787,
Harrogate

Dear Sir,

Planning Application 18/03172/OUTMAJ 6.79.7518.E.OUTMAJ
North East Gas Offices Site, Skipton Road, Harrogate

Thank you for your consultation on the above application for a retail park.

Please note that the following comments do not encompass the siting, design or materials of the building or the consequences of additional traffic or the impact on residential neighbours, so there is no inference that all or any of these aspects of the application are acceptable. The comments are only on the impact of retail on the town centre and as related to planning policy.

TOWN CENTRE RETAIL

We strongly object to the retail park, especially because of the current state and trends of retailing in Harrogate town centre. As shopping habits change rapidly to on-line shopping, the town centre needs support in order to maintain vitality and viability.

Although shop vacancy rates in Harrogate may be less than the national average, this is no reason to be complacent and exacerbate any downward trend in retail performance.

Important income generators in our town and the district are tourism and the exhibition/conference trade. An attractive and lively town centre can only enhance these. Despite the growing on-line trend there will always be the need and desire for various town centre uses that cannot be obtained on-line. This includes retail where service and advice may be required and of course physical examination of the merchandise. There may even be those who prefer to know they have found the right items and not have the prospect of frequently posting them back! Remember that a retail park does not offer the range of services that are available in a lively town centre. We would suggest that the smaller independent shops are not to be found on a retail park. Maintaining the mix of independent and family run businesses, along with larger commercial organisations, is vital for the attractiveness of the town centre.

PLANNING CONSIDERATIONS

An application for a DIY store was refused in 1993 because of loss of employment land. The DIY store was also said to be over-development detrimental to residents at 3,251sq m. The

current application for a retail park has a net retail tradable area of 12,988sq m plus the café at 167sq m!

In 2001 an application for residential use was withdrawn, officer opinion being that it should be refused due to the loss of an employment generation site, contrary to policy HDLP E2. This policy has been saved. The Core Strategy of 2009 confirms the support for employment land under Policy JB3: Land for Jobs and Business.

Saved Policy S2 – Shopping Centres – says that New Shopping Development will be permitted in, or as an Extension to Existing Shopping Centres.

Core Strategy Policy JB4: Retail and Town Centre Development, obviously supports development in Harrogate Town Centre as a Sub Regional Town.

The first two bullet points are –

- Expansion of its main shopping area:
- Additional food and particularly non-food shopping floor space: *(note- the policy is referring to the town – not out of town. See para 5.28)*

Capacity for additional food retail is discussed at para 5.29 saying that a main food store could be located in the north of the town. *(Note - there is no mention of accommodating a retail park out of town selling non-food or comparison goods).*

The HDLP Publication Draft of 2018 includes Draft Policy EC5: Town and Local Centre Management. Criterion C requires a sequential approach to retail development that does not serve a purely localised need outside of the primary shopping areas of Harrogate, Knaresborough, etc.

Also, under Criterion D an Impact Assessment is required for comparison retail of 2500sq m outside the Primary Shopping Area.

An application for a supermarket (TESCO) was approved 27th February 2012 Ref: 09/02704/FULMAJ.

Common policy threads run through the Saved Policies of the Local Plan 1991-2006, the Core Strategy February 2009 and the Local Plan Publication Draft 2018. These include protection of Harrogate town centre (and other main centres) from retail development outside of the centres that would damage vitality and viability. There is also encouragement that retail development should take place within the town centres. Policy JB4 of the Core Strategy at para 5.28 says that use of brownfield sites should be maximised, and lists land around the railway and bus stations, particularly for non- food retailing. Also that expansion of retailing could take place on the West Park and Dragon Road/Bower road areas of town.

CONCLUSIONS on the limited aspects of the application as noted at the head of this letter
If the council was minded to approve a retail park at the New Park Gas Site, each and every unit should, separately, satisfy the sequential test and provide a retail impact assessment for the type and scale of goods that they would sell. In addition to such requirements the overall developer should go through the same processes of sequential test and impact assessment. Any occupiers of the units should not be able to change the

types or mix of goods for sale without express permission and there should be a condition in order to achieve this.

This application for a retail park is very much larger than the DIY store that was refused in 1993 so the detriment to local residents would be that much greater.

A retail consent exists for the site in the form of a large supermarket and that this may have been implemented to a minor degree. However it has never been council policy to look favourably on a retail park in this area, which would have the effect of damaging expansion of the town centre as outlined under Core Strategy Policy JB4. Prior to the TESCO permission the site was considered an employment site. A retail park would clearly be in competition with existing comparison goods shops in the town centre which the Council is attempting to support by current and draft policies. It is essential that these policies are implemented, especially considering the meteoric rise in the popularity of internet shopping.

The application should be refused.

Thank you again for your attention.

Yours faithfully,

Henry Pankhurst
Chairman
Harrogate Civic Society