



JMS PLANNING & DEVELOPMENT

PLANNING STATEMENT

IN SUPPORT OF A
PLANNING APPLICATION
BY GREGGS PLC

FOR THE CHANGE OF USE
FROM A1 TO MIXED A1/A3
WITH ASSOCIATED WORKS

AT

11 HOPE STREET
WREXHAM
LL11 1BG

August 2023



Proposal: Change of use at 11 Hope Street, Wrexham L11 1BG

Client: Greggs PLC

Date: August 2023

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SECTION 1: INTRODUCTION

- 1.1 This Planning Statement has been prepared on behalf of Greggs PLC and is submitted in support of a full application for the change of use of 11 Hope Street, Wrexham, LL11 1BG from an A1 use to a mixed A1/A3 use with associated works to allow Greggs to operate from the site.
- 1.2 It is proposed that the introduction of a replacement (larger) Greggs bakery within Wrexham Town Centre will provide a complementary service to the general existing provision in the Centre, providing an important supporting use thereby reducing unsustainable car journeys, improving the attractiveness of the area for existing visitors and increasing choice, whilst also generating further employment. Furthermore, due to the location of the bakery and its limited scale its impact will be negligible and the Retail Centre will not be harmed.
- 1.3 It's important to note from the outset that this proposal seeks to replace the existing Greggs within the Wrexham Town Centre at 54 Hope Street, further reinforcing the negligible impact on the centre.
- 1.4 This report continues in Section 2 by providing a summary of the site's location. Details of the planning history of the site and wider area are set out in Section 3, with full details of the proposed occupier contained within Section 4. A detailed summary of the policy position at national and local level is set out within Section 5. Planning issues are explored in Section 6. Conclusions based on the above are drawn within Section 7.



SECTION 2: SITE LOCATION AND CONTEXT

- 2.1 The site is positioned in the heart of Wrexham Town Centre, along a designated Principal Shopping Area. It occupies a prominent location on Hope Street and Queen Street. The unit is presently unoccupied, though it was last occupied as a mobile phone shop, which was an A1 use.
- 2.2 The unit extends to approximately 215sqm of usable floorspace, which comprises of a ground and 1st floor.
- 2.3 Wrexham is the largest Town in North Wales and the principal commercial and administrative centre for the region. Being within a Town Centre, the site is located within a sustainable location – in close proximity to a number of local facilities and services. The site is accessible by a variety of modes of transport, including public transport. Wrexham is the 3rd largest Retail Centre in Wales, after Cardiff and Swansea. The Town has an estimated shopping population of 142,000 and a primary catchment of 246,000 people.
- 2.4 The site is situated within a Conservation Area and is designated as being within a Principal Shopping Area.



SECTION 3: PLANNING HISTORY

- 3.1 A planning history search of the application site has been undertaken using Wrexham's County Borough Council's online application search system. Applications are summarised below:

Reference	Description	Status
P/2014/0685	Installation of air Conditioning condensing unit	Withdrawn
P/2010/0478	Display of replacement signage	Granted 30.06.10

- 3.2 As you can see from the planning history, the store has been in operation since before 2010. The units was last occupied as a mobile phone shop, under use class A1.



SECTION 4: THE PROPOSAL

- 4.1 With over 2,000 shops, nine centres of excellence and some 20,000 employees who serve millions of customers each week, Greggs is the UK's leading bakery food-on-the-go retailer. The company started over 80 years ago when a John Gregg started out with the goal to deliver, by bicycle, fresh eggs and yeast to families in Newcastle. 10 years later he opened Greggs of Gosforth on Gosforth High Street, which remains a Greggs to this day.
- 4.2 As confirmed by the Chief Executive 'it is a duty as a modern business to stand for more than just profit' and in February 2021 published 'The Greggs Pledge', and in April 2022 and 2023 updates to the Pledge were published.
- 4.3 Greggs has a proud reputation of giving back and since John Gregg founded the business in 1939, Greggs have always tried to do the right thing by their people, suppliers and communities. 'The Greggs Pledge' is their first full sustainability report and sets out ten things they are doing to make the world a better place by 2025 and beyond.

The Breakfast Club Programme

- 4.4 '*The Greggs Pledge*' commits to supporting 1,000 schools' Breakfast Clubs by 2025 providing some 70,000 meals each school day. Greggs started the Breakfast Club programme in 1999 because it knew there were children over the country attending school every day without having eaten breakfast. As at April 2023 there are over 789 Breakfast Clubs operating across the UK every day. Each school day, these school clubs serve a nutritious breakfast, free of charge, to over 49,000 primary school children making sure they have the energy to concentrate and learn.
- 4.5 Evaluations of Breakfast Club schemes have uncovered the following key benefits:
- Children have improved health and nutrition;
 - Children have improved attendance and punctuality;
 - Children are able to socialise and make friends;
 - Children have better relationships with school staff;
 - Parents are less wary of schools and are more likely to attend parents' evenings; and
 - Children are able to concentrate better, and results are improved.
- 4.6 The Breakfast Club model, which delivers flexibility to meet the needs of the children, has been highly successful with many schools working with the Foundation for in excess of 20 years.



Putting an End to Food Waste

- 4.7 Greggs are obsessed with freshness and that is key to the business model, but it is a challenge too, making sure there is enough for everyone but avoiding waste at the end of the day. Greggs have focussed on reducing waste in production and in the shops and also putting waste to good use.
- 4.8 Greggs aims to donate as much unsold food to charity as possible, including soup kitchens, food banks and shelters for the homeless and the vulnerable. The amount of unsold food the company has donated to good causes has increased ten-fold over the last five years and the company has ambitious plans to grow this more in the years ahead. At the end of 2019 there were 1,700 organisations regularly collecting unsold food, increasing food donations in comparison to 2018, and Greggs are working to increase this further over the coming years.

Supporting our Communities

- 4.9 Between 2021 and 2023 Greggs have increased their 'Outlet shops' from 13 to 29 around the UK where day old food products are sold at a reduced price helping people to spend less on food. These are located in areas where social deprivation is high and over the next four years Greggs intends to increase the number of such '*Outlet shops*' to 50.
- 4.10 The outlet shops were originally introduced to help avoid sending edible food to land fill, however, Greggs now also donate a share of its profits from these shops to the Greggs' Foundation which passes this on to local community groups that are working to address food poverty and associated problems.

Helping our Customers to make Healthier Choices

- 4.11 In 2016 Greggs introduced their 'balanced choice' range which is made up of products with good nutritional content and each containing fewer than 400 calories. In 2019 healthier choices (including 'balanced choice') made up 22% of the items on our shelves and at April 2022 this was 32%, meaning Greggs have already exceeded their target of 30% by 2025. This has been achieved through clear information, education and promotions and they now propose that at least 30% of all new products created will be healthier choices.

Net Zero Carbon

- 4.12 Greggs are committed that by 2025 they will be well on their way to achieving carbon neutrality by using 100% renewable energy across all of their operations. Today 96% of the electricity Greggs use is from renewable sources and therefore carbon neutral. The goal is simple; Greggs want that to be 100% by 2025.



- 4.13 Greggs started this journey by putting photovoltaic solar panels on the roof of nine of their manufacturing sites which have the capacity to generate 2,111 kW every day which is the equivalent to the amount of energy used in 235 typical UK households. Whilst they do not have sufficient roof space to generate enough renewable energy to meet all of their energy needs Greggs have chosen to purchase Green Electricity from the grid which has had the result of reducing the carbon intensity of the business by over two thirds.
- 4.14 Electricity accounts for around 60% of Greggs total energy needs and a further 10% comes from natural gas. Around a quarter of their energy requirements is used to power their vehicles and they are working to provide a greener fleet. Refrigeration gases make up around 15% of Greggs direct carbon footprint and they are looking at ways to reduce this with less leakage and improved maintenance whilst exploring less harmful alternatives.
- 4.15 Greggs also have a number of other carbon reduction projects which include energy saving technologies, helping customers to eat less meat, reduce packaging, sustainable forest management and decreasing the use of palm oil and soya.

Building the Shops of the Future

- 4.16 Greggs are committed that by 2025 25% of their shops will feature elements from their eco shop '*store of the future*' design. In 2020 Greggs built 84 new shops around the country and have refitted an additional 33 which provides Greggs with a great opportunity to tweak their approach and think cleverly about ways to save energy and do their bit to be more environmentally friendly. All new shops include certain things as standard such as putting doors on all their self-select fridges, using LED lighting and where appropriate the use of automatic front doors. Greggs continue to be on the lookout for new green technologies which can be incorporated into their shop design and in 2022 they opened their first eco-shop and they launched green initiatives in over 250 shops.

Using Less Packaging

- 4.17 By 2025 Greggs will use 25% less packaging, by weight, than in 2019 and the only remaining packaging will be made from material that is widely recyclable.
- 4.18 In 2019 Greggs cut 350 tonnes of single use plastic from their operation through substitutions of plastic items with more sustainable materials. Greggs seek to continue this strategy to using, where appropriate, 50% of recycled content in all plastic packaging and ensuring that 100% of the plastic packaging collected by Greggs is recycled.



- 4.19 In 2021 Greggs joined the “*On Pack Recycling Label*” (OPRL) scheme to make recycling communications for customers easier to understand and during 2022 this was added to all own brand packaging.

Embracing Diversity

- 4.20 Greggs are committed to ensuring that by 2025 the workforce will represent the communities which they serve.
- 4.21 Greggs want everyone to feel welcome and their employees to be able to be themselves at work, whatever their background, preferences or views. They also want to make sure there are no barriers that might stop anyone from growing a successful career with them. Greggs accept that being a diverse business is critical to their future growth.
- 4.22 In Spring 2022, external consultants EY confirmed that Greggs had achieved the National Equality Standard, the UK’s leading diversity, equity and inclusion standard.

Sourcing Sustainably

- 4.23 By 2025 Greggs will have a robust and responsible sourcing strategy in place and will report annually on the progress towards their targets. Six key principles in meeting this commitment include ‘*we treat our suppliers with respect; we care about how animals are treated; we respect human rights; we support fair trade; we support local businesses and we respect the environment*’.
- 4.24 In 2022, Greggs published a Deforestation Policy including plans to be deforestation free by 2025.

Protecting Animal Welfare

- 4.25 Greggs are committed to securing and maintaining Tier 1 in the BBFAW Animal Welfare Standard by 2025.
- 4.26 Animal welfare is a priority for Greggs and they want to do the right thing by ethically sourcing which is consistent with their values and nothing less than you would expect from them. Greggs’ Farm Animal Welfare Standards, set clear rules that were developed with consideration to the Farm Animal Welfare Committees five freedoms and over the last five years this has been implemented by Greggs with their suppliers.



Greggs' Foundation

- 4.27 Greggs donates one percent of its pre-tax profits to the Greggs Foundation and distributes around £3.0 million to community and charity organisations throughout England, Scotland and Wales. A significant proportion of the Greggs Foundations' impact is also achieved with the generosity of Greggs' employees and customers. The Foundation brings together all of Greggs charitable groups which has a long and rich history. It is managed by an executive team of currently nine members of staff and overseen by a Board of Trustees, with the charitable mission of 'making a difference to people in need in the heart of Greggs' local communities'.
- 4.28 The Foundation prioritises organisations that support voluntary careers, people with disabilities, homeless people and older people. The Foundation aims to make a difference through the following programmes; North East Core Fund, Local Communities Urban Rivers Regeneration Fund, Hardship Fund, Breakfast Clubs Programme, Community Holiday Club Programme and Health Programme Grant which share the common goal of improving the quality of life of people in local communities.
- 4.29 The Community Urban Rivers Regeneration Fund provides funds to river trusts to run educational and community based environmental projects based on urban rivers.
- 4.30 The Tackling Health Programme is an interactive project for children which takes a holistic approach to teach children about their own health and well-being and about leading a healthy lifestyle.
- 4.31 The North East Core Fund makes grants to charitable organisations based on the North East of England, who make a difference to people in need. Grants can be up to £45,000 and aims to increase the capacity of organisations to provide quality services. Around £600,000 per year is donated through this programme.
- 4.32 The Hardship Fund provides grants to people in extreme financial need in the North East of England via recognised social organisations such as charities registered with the Charity Commission, housing associations and social services acting on behalf of a family or individuals in need. Grants are made for up to £180 to families and individuals and can be used towards household equipment such as cookers, fridges and washing machines that can make a significant difference to peoples' lives. Around £300,000 is awarded each year to people in need.

The Application

- 4.33 The proposed Greggs bakery will offer the following baked and convenience goods including:-

- Bread;
- Savoury pastries;
- Cakes;
- Sandwiches;
- Soups;
- Salads;
- Pasta;
- Snacks;
- Hot wraps;
- Confectionery;
- Hot and cold drinks; and
- Other ancillary items.

- 4.34 These items will be sold for consumption on or off the premises. The new store will extend to 215 sqm and will comprise a back of house area and a customer area to include an indoor seating area allowing customers to 'eat in' plus other associated works. The sales area will extend to 50 sqm. This offer will enable visitors, workers and residents within the wider retail area to obtain sustenance without travelling in their cars.
- 4.35 It is envisaged that a Greggs of this size will generate circa 4 full-time and 8 part-time jobs.
- 4.36 The proposed Greggs bakery is considered to offer a beneficial service to the residents and visitors of Wrexham, providing an accessible, attractive and affordable bakery bringing lunching opportunities on site.
- 4.37 Planning permission is sought for the unit to operate 6am – 9pm Monday – Saturday, 8am – 6pm Sunday, to ensure the needs of the people, particularly local employees of businesses in the wider area are met.
- 4.38 The applicant, Greggs, would be happy with a condition on any planning permission which stipulates that the proposed A1/A3 use is restricted for Greggs' occupation only in order to provide control over the operation of the site, and that it reverts to an A1 use if they vacate the property.



SECTION 5: PLANNING POLICY FRAMEWORK

- 5.1 This Section sets out an overview of national policy and Development Plan guidance relevant to the construction of a retail bakery to be operated by Greggs.

Future Wales – The National Plan 2040

Future Wales: The National Plan 2040

- 5.2 Future Wales: National Plan 2040 is the Welsh National Development Framework, setting the direction for development in Wales to 2040. It is a Development Plan with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate resistance, developing strong ecosystems and improving the health and well-being of the communities. The Plan acknowledges that Wales is facing a climate emergency which is actively changing the environment and directly affecting communities, whilst also facing an ecological emergency when the behaviours and decisions of the human race are causing harm to the resilience of ecosystems and species, combined with the effects of a global health pandemic and the need for the economy to be re-energised in a sustainable way, also recognising that things need to be learnt from previous excesses which have resulted inequitable wealth and access to services. The Welsh Government seeks to face the challenges and to find opportunities for a better Wales with every mechanism at their disposal. The National Development Framework is an important lever to deliver the change needed.
- 5.3 Future Wales is a Spatial Plan, which means it sets a direction of where we should be investing in infrastructure development for the greater good of Wales and its people. Future Wales sets the challenges of delivering these improvements to the public, private and third sectors. It makes clear the importance of planning new infrastructure and development in such a way that they are complementary rather than competing priorities, and showing opportunities are maximised and multiple benefits are achieved.

- 5.4 The Plan refers to the Well-Being of Future Generations (Wales) Act 2015 and the requirement that development and use of land contributes to improving the economy, social, environmental and cultural well-being of Wales. Future Wales is the highest tier of Development Plan setting out the National Development Framework and is focused on solutions to issues and challenges at a national scale. Its strategic nature means that it does not allocate development to all parts of Wales, nor does it include policies on all land uses. It is framework which will be built on by Strategic Development Plans at a regional level and Local Development Plans at Local Authority level. Plans are required to be in conformity with Future Wales and must be kept up-to-date to ensure they and Future Wales work together effectively.
- 5.5 Planning decisions at every level in the planning system must be taken in accordance with the Development Plan as a whole, Future Wales forms part of this Development Plan and replaces Wales Spatial Plan. Future Wales seeks to align and maximise its contribution to the Well-Being Wales objectives and ways of working as set out in the Well-Being of Future Generations (Wales) Act 2015 and takes a sustainable approach to development.
- 5.6 Future Wales is set out in five parts. Firstly, an introduction followed by an Overview of Wales, which sets out the four regions of Wales which are given further consideration later in the report. Thirdly, the report sets out ambitions and how these are going to be achieved, followed by Strategic and Spatial Choices and then detailed in relation to the regions.
- 5.7 Future Wales sets out a clear vision of what it seeks to achieve by 2040 in 11 outcomes. These are as follows:
- A Wales where people live and work in connective, inclusive and healthy places;
 - A Wales where people live in vibrant rural places with access to homes, jobs and services;
 - A Wales where people live in distinctive regions that tackle health and socio-economic inequalities through sustainable growth;
 - A Wales where people live in places with a thriving Welsh language;
 - A Wales where people live and work in towns and cities which are a focus and springboard for sustainable growth;
 - A Wales where people live in places where prosperity, innovation and culture are promoted;
 - A Wales where people live in places where travel is sustainable;
 - A Wales where people live in places with world class digital infrastructure;
 - A Wales where people live in places that sustainably manage their natural resources and reduce pollution;
 - A Wales where people live in places with biodiverse, resilient and connected ecosystems;



- A Wales where people live in places which are decarbonised and resilient.
climate

5.8 Policy 2 (Shaping Urban Growth and Regeneration – Strategic Placemaking) confirms that the growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed-use centres and public transport and integrate with green infrastructure. Urban growth and regeneration should be based on the following strategic placemaking principles, which include:

- Creating a rich mix of uses;
- Building places at a walkable scale with homes, local facilities and public transport within walking distance of each other; and
- Increasing population densities with development built at urban densities that can support public transport and local facilities.

5.9 Policy 6 (Town Centre First) confirms significant new commercial, retail, education, health, leisure and public service facilities must be located within town and city centres confirming the sequential approach. This puts the health and vibrancy of town centres as the starting point of locational decision-making. It also directs facilities and services to where intended users can easily walk, cycle and/or use public transport to access them. The policy also stresses the need for Town Centres to become multi-functional places. Commercial, retail, education, health, leisure and public service facilities should be located within town and city centres. This policy applies to developments of a significant scale, which can broadly be defined as where the facility will serve a town, city or region-wide catchment. It is for planning authorities to determine whether a development is considered to be of a significant scale. However planning authorities are encouraged to take a similar approach for smaller developments. It makes clear that the policy is intended and relates to new development and does not apply to extension to existing facilities.

5.10 Whilst this document forms part of the Development Plan it is largely at a very high level and the broad principles should be reflected down into more local policies within the Development Plan. However, it does form part of the “Development Plan” and therefore is a material consideration in the determination of the application.

Planning Policy Wales

5.11 Planning Policy Wales Edition 11 published in February 2021 sets out the vision for Wales as set out in the Well-Being of Future Generations Act; a more prosperous Wales; a resilient Wales which supports healthy, functioning ecosystems and recognises the limits of the global environment; a healthier Wales; a more equal Wales; a Wales of more cohesive communities; a Wales

of vibrant culture, and a globally responsible Wales. The document embeds the spirit of the Act by moving towards a low carbon, resilient society, of providing secure and well paid jobs and of building well connected environments for everyone in Wales that improves lives, health and enhances well-being.

- 5.12 Planning Policy Wales (PPW) sets out the land use planning policies of the Welsh Government and is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars and policy clarification letters which together with the PPW provide the National Planning Policy Framework for Wales (paragraph 1.1).
- 5.13 The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and culture wellbeing of Wales as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation. A well-functioning planning system is fundamental for sustainable development and achieving sustainable places (paragraph 1.2).
- 5.14 The PPW promotes action at all levels of the planning process, which is conducive to maximising its contribution to the well-being of Wales and its communities. It encourages a wider, sustainable and problem solving outlook which focuses on integrating and addressing multiple issues rather than on an approach which is fragmented, un-coordinated and deals with issues in isolation (paragraph 1.3).
- 5.15 The Well-being of Future Generations Act places a duty on public bodies to carry out sustainable development, with the concept of sustainable development being at the heart of planning policy since 2002. However, the concept has been expanded under the Well-being Act and it requires improvement in the delivery of all four aspects of well-being; social, economic, environmental and cultural. The Well-Being Act has established seven well-being goals which are intended to shape the work of all public bodies in Wales; a global responsible Wales; a prosperous Wales; a resilient Wales; a healthier Wales; a more equal Wales; Wales cohesive communities; and a Wales of vibrant culture and providing Welsh language.
- 5.16 Paragraph 1.18 confirms that a planned approach is the most efficient way to secure sustainable development through the planning system and it is essential that plans are adopted and kept under review. Legislation secures a presumption in favour of sustainable development in accordance with the Development Plan unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated.



- 5.17 Everyone engaged with or operating within the planning system in Wales must embrace the concept of place making in both plan making and development management decisions in order to achieve the creation of sustainable places and improve the well-being of communities (paragraph 2.1).
- 5.18 Sustainable places is the goal of the land use planning system in Wales; they are the output of the planning system rather than the process of achieving them. All development decisions, either through Development Plan policies choices or individual development management decisions should seek to contribute towards the making of sustainable places and improving well-being (paragraph 2.2).
- 5.19 The planning system should create sustainable places that are attractive, sociable, accessible, active, secure, welcomingly, healthy and friendly. Development proposals should create the conditions to bring people together making them to want to live, work and play in areas with a sense of place and well-being, creating prosperity for all (paragraph 2.3).
- 5.20 The planning system is the key mechanism for delivering sustainable places. It provides a critical mechanism where opportunities for long term benefit and integrated decision making meet, allowing preventative and proactive solutions to be found (paragraph 2.5).
- 5.21 Planning policies, proposals and decision must seek to promote sustainable development and support the well-being of people and communities across Wales. This can be done through maximising their contribution to the achievement of the seven well-being goals by using the five ways of working, as required by the Well-Being of Future Generations Acts. This will include seeking to maximise the social, economic, environmental and cultural benefits, whilst considering potential impacts when assessing proposals and policies in line with the Act's sustainable development principle (paragraph 2.8). The most appropriate way to implement these requirements through the planning system is to adopt a place making approach to plan making, planning policy and decision making (paragraph 2.9).
- 5.22 Key planning principles to achieve the right development in the right place include growing our economy in a sustainable manner, making better use of resources, facilitating accessible and healthy environments, creating and sustaining communities and maximising environmental protection and limiting environmental impact.
- 5.23 Paragraph 2.20 acknowledges that in considering social, economic, environmental and cultural benefits there may be occasions when a proposal may not meet all of the desired outcomes or that a specific outcome will not be achieved but wider well-being should be supported.

- 5.24 The impact and challenges of the Covid-19 pandemic is recognised with the need to ensure people's well-being is at the heart of planning and decision making. PPW seeks to lead the way to recover in a positive manner through '*Placemaking*', with social considerations, economic considerations, cultural considerations and environmental consideration at its heart.
- 5.25 Guidance on retail matters is contained within Section 4. This guidance confirms that Planning Authorities should establish a hierarchy of retail and commercial centres in their Development Plan strategy, identifying boundaries on the Proposals Map (paragraph 4.3.10). Such centres should then be categorised by the function they fulfil, considering their future roles and recognise opportunities to support the Welsh Government's retail and commercial centre objectives.
- 5.26 Paragraph 4.3.13 confirms that it is important that communities have access to adequate levels of retail provision and evidence should demonstrate whether a retail provision is adequate or not by assessing if there is further expansion capacity in a catchment area (quantitative need) or there is a lack of retail quality, range of goods assessable (qualitative need).
- 5.27 Paragraph 4.3.14 advises that when determining planning applications Local Planning Authorities should consider whether there is a need for additional retail provision for proposals outside of defined retail and commercial centre boundaries or on non-allocated sites.
- 5.28 It is confirmed that need may be quantitative to address a quantifiable unmet demand for provision or qualitative. Preference should be given to establishing quantitative need. (Paragraph 4.3.15).
- 5.29 Qualitative assessment should cover both positive and negative aspects and may become an important consideration where it supports the objectives and retail strategy of an adopted Development Plan or the policies in the guidance and include; is highly accessible by walking, cycling and public transport; contributes to a substantial reduction in car journeys; contributes to the co-location of facilities in existing retail and commercial centres; significantly contributes to the vibrancy, attractiveness and viability of such a centre; assists in the alleviation of overtrading or traffic conditions surrounding existing local comparable stores; addresses locally defined deficiencies in provision in terms of quality and quantity, including that which would serve new residential developments; or where it alleviates a lack of convenience goods provision in a disadvantaged area.
- 5.30 It will be for the Planning Authority to determine and justify the weight to be given to any qualitative assessment and it is advised that regeneration and additional employment benefits are not considered qualitative need factors in retail policy terms, however they may be material considerations in making a

decision on individual planning applications if the regeneration and job creating benefits can be evidenced.

- 5.31 The Welsh Government operates a town centre first policy in relation to the location of new retail and commercial centre development which applies to both site allocations in Development Plans and in the determination of planning applications for retail and other complementary uses. By adopting a sequential approach the first preference should be to locate new development within a retail and commercial centre defined in the Development Plan Hierarchy of Centres (paragraph 4.3.18).
- 5.32 Whilst the document sets out a number of uses to which the sequential approach does apply, it does acknowledge that some education, healthcare and community uses may have specific accessibility requirements which mean that they need to be located close to the communities they serve. Paragraph 4.3.21 advises that Planning Authorities should be flexible in their approach where it is necessary.
- 5.33 Paragraph 4.3.26 advises that all new retail planning applications or retail site allocations of 2,500 sqm or more gross floor space that are proposed on the edge or outside designated retail and commercial centres should, once a need has been established, be supported by a Retail Impact Assessment. In the case of smaller applications, paragraph 4.3.27, advises that Planning Authorities will need to determine whether an assessment is necessary, for example where a smaller proposal may have a significant impact on a centre. Where such assessments are requested, they should be proportionate to potential impacts.
- 5.34 Paragraph 4.3.42 recognises that shops linked to petrol stations, can also serve a useful role in rural areas by providing new sources of jobs and services. In assessing such proposals, Planning Authorities should take account of the potential impact on nearby retail and commercial centres or village shops; the desirability of providing a service throughout the year; and the likely impact of traffic generated and access and parking arrangements.
- 5.35 Section 5 focuses on 'Productive and Enterprising Places' and covers the economic components of place making but noting that these are complementary to those of the Active and Social, and Distinctive and Natural themes and collectively the three themes come together to contribute towards the national sustainable place making outcomes. Productive and enterprising places are those which can raise our economic, social, environmental and cultural well-being by providing well-connected employment and sustainable economic development. These places are designed and sited to promote healthy lifestyles and tackle climate change. This is done by making them easy to walk and cycle to and around, accessible by public transport, maximising the use of non-renewable sources and using renewable and low carbon energy sources.

- 5.36 For planning purposes the Welsh Government defines economic development as the development of land and buildings for activities that generate sustainable long term prosperity, jobs and incomes. The planning system should ensure that the growth of output and employment in Wales as a whole is not constrained by a shortage of land for economic uses (paragraph 5.4.1).
- 5.37 Economic land uses include the traditional employment land uses (offices, research and development, industry and warehousing) as well as uses such as retail, tourism and public services (albeit it is confirmed these are dealt with elsewhere in the PPW).
- 5.38 Within Section 5 guidance is given on providing sufficient land needed for the employment market at both strategic and local levels. It goes on to confirm that sites identified for employment use should be protected from inappropriate development (paragraph 5.4.4) but also recognises that necessary infrastructure provision and the alignment of jobs and services with housing and sustainable transport infrastructure is important to reduce the need for travel and dependency on travel by car is important (paragraph 5.4.13).

Technical Advice Notes (TAN)

- 5.39 The Technical Advice Notes (TANs) provide guidance on a range of specific topics. The pertinent TANs in relation to the application site are considered to be:
- TAN4 – Retail and Commercial Development
 - TAN5 – Nature Conservation and Planning
 - TAN11 – Noise
 - TAN12 – Design
 - TAN15 – Development and Flood Risk
 - TAN18 – Transport
 - TAN20 – The Welsh Language
 - TAN22 – Planning for Sustainable Buildings
 - TAN23 – Economic Development

Local Development Plan

- 5.40 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires Local Planning Authorities to determine planning applications in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.41 The relevant Development Plan comprises the Wrexham Unitary Development Plan (1996-2011).

- 5.42 Upon the Proposals Map, the site sits within a Conservation Area, and is also designated as being within a Principal Shopping Area.

Wrexham Unitary Development Plan (1996-2011)

- 5.43 Policy GDPI All new development should:-

- a) Ensure that built development in its scale, design and layout, and in its use of materials and landscaping, accords with the character of the site and makes a positive contribution to the appearance of the nearby locality.
- b) Take account of personal and community safety and security in the design and layout of development and public / private spaces.
- c) Make the best use of design techniques, siting and orientation in order to conserve energy and water resources.
- d) Ensure safe and convenient pedestrian and vehicular access to and from development sites, both on site and in the nearby locality.
- e) Ensure that built development is located where it has convenient access to public transport facilities, and is well related to pedestrian and cycle routes wherever possible.
- f) Ensure the safety and amenity of the public and safeguard the environment from the adverse effects of pollution of water, land or air, hazards from industry and quarrying, and associated noise, odour or vibration arising from development.
- g) Secure public services (e.g. gas, water, electricity) to development at minimum public cost.
- h) Safeguard sites and areas of nature conservation and wildlife interest, and to provide new habitats where there is an unavoidable loss of existing habitats and areas of wildlife interest.
- i) Ensure that development does not result in, or is subject to, flooding, soil erosion, landslides or contamination, either on or off the site.
- j) Have regard to the need to safeguard those areas that possess a strong Welsh cultural and/or linguistic identity from development that could harm this identity.
- k) Secure the development of sustainable communities, through the promotion of the economic, social and environmental well-being of the area.



- 5.44 Policy PS1 - New development for housing, employment, and community services will be directed to within defined settlement limits/employment areas.
- 5.45 Policy PS3 Development should use previously developed brownfield land comprising vacant, derelict or underused land.
- 5.46 Policy S1 Non-retail proposals on ground floor frontages in the principal shopping streets of Chester Street (part); Henblas Street; Hope Street; Lord Street (part); Queen Street; Regent Street (part); and Rhosddu Road (part), Wrexham will not be permitted if they have a detrimental effect upon the character, vitality or viability of the area.
- 5.47 Policy EC7 - Within, and in close proximity to, conservation areas, the priority will be to preserve and/ or enhance those buildings, structures, streets, trees, open spaces, archaeological remains, views, and other elements which contribute to the unique character of the area. New buildings and alterations or additions to existing buildings in conservation areas, whether listed as of special architectural or historic interest or not, must reflect the design and character of the area as a whole and the form, scale, detailing and materials of existing buildings.

Supplementary Planning Guidance

The Conservation Area Character Assessment and Management Plan

- 5.48 The document aims to provide clear guidance for those seeking to undertake works of development and change within the Conservation Area and provides a framework for decision-makers to ensure that through these works, the special character and appearance of the Conservation Area is preserved and enhanced.



SECTION 6: PLANNING ISSUES

6.1 This section of the Planning Statement sets out the general planning matters, which form part of the consideration of the determination of this application. These planning matters relevant to the determination of the application are informed by pertinent planning policy. The key planning policies and material considerations identified in the previous section, are namely;

- Principle of the use;
- Retail issues;
- Impact on Character and Appearance of the Area;
- Accessibility;
- Amenity; and
- Flooding.

6.2 Each of these issues are now considered in turn below.

Principle of the Use

6.3 Planning Policy Wales (December 2018) confirms that the purpose of the planning system is to contribute towards the delivery of sustainable development (paragraph 1.2.), the Wellbeing of Future Generations (Wales) Act 2015 places a duty on public bodies (including the Council) to carry out sustainable development.

6.4 The application site consists of a vacant unit within a Principal Shopping Area within Wrexham Town Centre. As set out already the authorised use of the existing building on the site is Class A1. Future Wales – The National Plan 2040, Policy 2 seeks to promote a Town Centre First approach, which supports the growth of mixed-use centres. This application seeks consent for an A1/A3 mixed use, and will allow for the existing Greggs located at 54 Hope Street to relocate to a larger premises. A larger premises is required, as the existing unit is small and does not meet the requirements for the business.

6.5 The proposed development will ensure retail vitality within Wrexham Town Centre by converting a vacant unit. The store will extend to 215 sqm and will comprise a back of house area and a customer area to include an indoor seating area allowing customers to ‘eat in’, as well as additional seating area outside store. The larger unit will allow for a larger back of house which will allow more goods to be prepared and sold. It is therefore considered that the new store will allow for an existing businesses to invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account local business needs.

6.6 The proposed retail development meets the requirements set out in Policy GDPI. The proposed development has been designed to integrate with the existing



development in the area, provides good pedestrian linkages with adjacent parts of the Town Centre, and does not have a negative impact on the shopping character, visual amenity, vitality or viability of the area.

- 6.7 Similarly, the proposals aligns with Policy S1 which seeks to ensure the preservation of town centre retail, and allows for non-retail uses as long as they do not have a detrimental effect upon the character, vitality or viability of the area. Policy PS3 is also relevant which seeks to ensure that development uses previously developed brownfield land comprising vacant, derelict or underused land. The proposed development will ensure retail vitality within Wrexham Town Centre by converting a vacant unit. The proposal has the potential to improve the vitality and viability of the area and support the local community both through the provision of jobs and the Greggs Pledge social and environment commitments.
- 6.8 The proposed development, as previously mentioned, will not undermine the shopping character of the area. It is considered to be a suitable town centre use and will not negatively impact the overall vitality and viability of the retail function in the town centre. With the mixed A1/A3 Use of the proposed unit, the proportion of non-A1 retail at the ground floor will remain unchanged. Additionally, there is no concern regarding an excessive concentration of non-A1 uses as the intended use preserves the A1 classification.
- 6.9 As detailed elsewhere in the report, it is anticipated that the Greggs bakery will provide approximately 4 full time and 8 part-time jobs which will be sourced mostly from the existing Greggs store at 54 Hope Street, which is set to be replaced with this scheme. However as this is a larger unit, it is considered the proposed unit will provide more jobs than the existing unit.
- 6.10 The benefits of the Greggs in respect of job creation and support for the wider area, both in terms of existing occupiers, particularly those working in the immediate vicinity of the site and wider area, plus the improvement to the attractiveness of the area for future occupiers, should also be noted.
- 6.11 Greggs has a strong commitment to social and environmental responsibilities as detailed in Section 4 above which includes carbon neutrality, recycling and decreasing food waste and a number of programmes to support local people including breakfast clubs and work through the Greggs Foundation, supporting the community. Accordingly, Greggs make a valuable contribution beyond just the physical presence of a retail unit.
- 6.12 In conclusion, the use of the site as a Greggs bakery/coffee shop is compliant with Policies GDPI and S1 by integrating with existing development, providing pedestrian linkages, and not negatively impacting the area's shopping character. It is envisaged that the proposed Greggs unit will improve the attractiveness of the town centre to both existing and future occupiers by



providing an easily accessible and healthy lunching option whilst also providing employment opportunities.

- 6.13 It is therefore considered that the proposal would not impact negatively on the vitality and viability of Wrexham Town Centre. As such, the principle of the development accords with the visual amenity requirements of GDPI and S1.

Retail Issues

- 6.14 On the basis of the proposed use is entirely policy compliant, and that it is a replacement unit for the existing Greggs store at 54 Hope Street, there is no requirement to undertake a Sequential Assessment or Impact Assessment. Despite this, to provide peace of mind, retail issues are discussed below.
- 6.15 The proposed Greggs bakery seeks to primarily serve those living, working and visiting the area, so the application's location is well positioned ensuring it is within easy walking distance of those it seeks to serve, namely local residents. The proposal is policy compliant so no further assessment is required.
- 6.16 Accordingly, it is not considered that the proposal will have any adverse impact on the Town Centre and will have a positive impact on the area to accord with Local and National Guidance in respect of retail issues.

Impact on Character and Appearance of the Area

- 5.49 The application site is designated as being within a Conservation Area, and as such Policy EC7 is relevant. The Policy seeks to ensure that within Conservation areas, the priority will be to preserve and/ or enhance those buildings. It is considered that the proposal will provide improv the visual appearance of the site compared to the existing vacant store.
- 6.17 The store in terms of its visual appearance, the unit will remain broadly the same as existing. As with any unit within a shopping area, signage will be erected, however this will be minimal and will be in keeping with the existing signage at the Greggs store at 54 Hope Street. There will be no significant alterations in terms of the stores original features, and the alterations will primarily relate to the new signage. The proposed signage will ensure that there is no disconnection between the upper and ground floors of the unit.
- 6.18 In terms of maintenance, Greggs has high standards both in terms of physical appearance of the site and as an operator, so will ensure the unit is well maintained throughout its occupation. It is considered that the occupation of the unit by a national operator will ensure the site's visual appearance is improved and maintained. Greggs has high standards both in terms of physical appearance of the site and as an operator, so will ensure the unit is well maintained throughout its occupation. Accordingly, there will be a significant improvement in the visual appearance of the site compared to the existing



position of an empty store, therefore enhancing the visual amenity of the Conservation Area, in line with Policy EC7.

- 6.19 The design of the site is such that activity within the building will improve the vitality and viability of the wider area. The glazed frontage with sliding doors will enable activity to be seen within the building, which in addition to the hours of operation will add vitality to the area. It is therefore considered that the proposed change of use, through the occupation of the Greggs unit will not harm the character and appearance of the Conservation Area.

Accessibility

- 6.20 The environment within Wrexham Town Centre is attractive and suitable for pedestrians and cyclists. This, therefore, means that visitors, workers and residents within the area can easily access the application site as it is well located and visible.
- 6.21 It is considered that the introduction of a new Greggs bakery within the Wrexham Town Centre will provide a complementary service to the general existing provision in the village and wider area, providing an important supporting use thereby reducing unsustainable car journeys, improving the attractiveness of the area for existing visitors and increasing choice, whilst also generating further employment.
- 6.22 The scheme is therefore considered acceptable in highway terms.

Amenity

- 6.23 The application site is predominantly surrounded by retail uses. It is not considered that any noise or amenity issues will arise. Deliveries and servicing of the site will be managed within operating opening hours and would cause no harm to any of the adjoining occupiers.
- 6.24 Noise arising from customers visiting the site is not considered to have any adverse impact on the amenity of surrounding occupiers due to the layout of the sit, its small scale and surrounding uses and the nature of the proposal.
- 6.25 The proposal makes best use of an existing building so is entirely appropriate to the site's location and surrounding uses. The storage of bins has been designed into the site layout from outset to cause minimal disruption. As such the bin storage area is situated externally to the rear of the unit, which allows access for collection.
- 6.26 2 no. AC units will be wall mounted to the rear of the building alongside the toilet extract, these will dissipate heat from the refrigeration and ovens with a silencer and a carbon filter to mitigate against noise and odour.

- 6.27 Accordingly, the proposal accords with general design objectives set out in the Development Plan. It is not considered that there are any amenity issues arising from the proposal due to the application site's location.

Flooding

- 6.28 The site is not located within a flood zone as such there is no requirement for a Flood Consequence Assessment.



SECTION 7: CONCLUSIONS

- 7.1 This Planning Statement has been prepared on behalf of Greggs PLC and is submitted in support of a full application for the change of use of 11 Hope Street L11 1BG from an A1 use to a mixed A1/A3 use with associated works to allow Greggs to operate from the site.
- 7.2 The proposed use will support the immediate surrounding area and uses, residents and workers within the Town Centre who want to have something convenient and quick to eat. The proposal will make the Wrexham Town Centre more attractive and sustainable by providing healthy catering facilities whilst also providing several valuable jobs on the site.
- 7.3 It is expected that the proposal will result in Greggs providing 4 full-time and 8 part-time jobs making a significant contribution to the economy, in addition supporting the uses in the wider area.
- 7.4 The proposal seeks the change of use of the retail unit from A1 to a mixed use A1/A3 unit with associated works. Therefore there will not be an adverse impact on the current proportion of A1 offer within Wrexham Town Centre. The design of the new unit will respect and enhance the character and appearance of the Conservation Area.
- 7.5 It's important to note that this proposal seeks to replace the existing Greggs within the Wrexham Town Centre at 54 Hope Street, further reinforcing the negligible impact on the centre.
- 7.6 The proposal is policy compliant meeting both National and Local Planning Policy, in particular Policy GDPI and S4 which supports suitable retail and non retail development within Wrexham Town Centre.
- 7.7 Due consideration has been given to site layout and design, creating a light, bright, retail area. Appropriate provision has been made for pedestrians accessing the site and refuse storage (general and recycling) has been designed into the scheme. The overall appearance of the site will be improved from the existing position benefiting the character and appearance of the wider area.
- 7.8 Based on the above, it is respectfully requested that planning permission is forthcoming for this proposal as it offers social, economic and environmental benefits to the area in line with national and development plan policy and is policy complaint, improving the vitality and viability of the area with no impact on the town centre, whilst also providing jobs and benefits to the community.