

PLANNING STATEMENT

3-9 Hope Street, Wrexham, LL11 1BG
On Behalf of Instant Managed Offices Ltd

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004



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Registered Office: Pegasus House, Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire, GL7 1RT

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1. INTRODUCTION

- 1.1 This Statement has been prepared by Pegasus Group on behalf of Instant Managed Offices Limited ('the Applicant') in support of a change of use application for the following proposed development at the ground floor of 3-9 Hope Street, Wrexham ('the site'):

"Change of Use of Ground Floor from Class A1 (Retail) to Class A2 (Financial and Professional Services)."

- 1.2 This Statement sets out the planning rationale that underpins the proposed development, to demonstrate its acceptability in planning terms.
- 1.3 The Statement is structured as follows:
- **Section 2** provides a description of the site and the surrounding area;
 - **Section 3** provides a description of the development proposals;
 - **Section 4** sets out the planning policy context;
 - **Section 5** assesses the proposals against relevant planning considerations; and
 - **Section 6** summarises and concludes the report.

2. SITE DESCRIPTION

Location

- 2.1 The site is situated within the administrative boundary of Wrexham Borough Council. The site is located on Hope Street within the centre of Wrexham. The site comprises the ground floor of the former New Look retail store. The New Look store has now closed and the unit will become vacant. It will not reopen following the Covid associated 'lockdown'.
- 2.2 The immediate surrounding character of the area is commercial being located within the town centre. The site is surrounded by a mix of retail and financial services outlets.
- 2.3 The site is located in the pedestrianised area of Hope Street within the retail core of Wrexham Town Centre. It comprises of a 2 storey building with the ground floor in retail use. it forms part of continuous built frontage which would appear to have been used solely for retail purposes.
- 2.4 The site has a history of retail use being most recently occupied by New Look. The New Look store has closed and will not be reopening after the Covid related lockdown. It is anticipated that the New Look store will relocate elsewhere within the town centre.
- 2.5 Access to the premises is directly from Hope Street via a level threshold. The shop front will remain unaltered. The upper floor of the building is not involved in the change of use.

3. DEVELOPMENT PROPOSAL

- 3.1 This proposal seeks a Change of Use from retailing (Use Class A1) to Financial and Professional Services (Use Class A2). The proposed use is to provide Job Centre type facility which will be managed and facilitated by Instant Group on behalf of the Department of Work and Pensions. The proposed change of use will support the local economy through the provision of job support and training, largely aimed at those whose employment opportunities have been affected by the Covid pandemic.
- 3.2 The Job Centre initiative has been progressed by the Department of Work and Pensions in order to address the economic consequences associated with the Covid pandemic. The Job Centre will operate on an appointment only basis and will be the base for circa 50 work coaches, reception and admin and security staff. The unit will be fully managed by the Instant Group.
- 3.3 Each member of the public will be allocated a specific work coach and given the address and an appointment time. On arrival the visitor will be welcomed inside the entrance of the unit and shown to their allocated work coach or waiting area. At the conclusion of their appointment they will be escorted out of the facility.
- 3.4 The internal layout of the facility will largely comprise desk areas, separated by screens to ensure the privacy of 1-to-1 meetings between advisors and visitors. Separate meeting and interview rooms will also be provided as part of the internal layout. A separate back of house area for staff and welfare facilities will also be provided. An indication of the internal floor layout has been provided as part of the planning application drawings.
- 3.5 Any additional external alterations and/or signage will be the subject of separate applications.

4. PLANNING POLICY CONTEXT

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) states that planning applications for development should be determined in accordance with the Statutory Development Plan unless material considerations indicate otherwise.
- 4.2 The Development Plan for Wrexham Borough Council consists of the Unitary Development Plan (1996 – 2011) which was adopted February 2005. Material considerations include National Planning Policy Wales (NPP) and any relevant technical advice notes (TANs).
- 4.3 The site is located within Wrexham Town Centre. Policy S1 of the UDP states non-retail proposals on ground floor frontages in the principal shopping streets in Wrexham will not be permitted if they have a detrimental effect upon the character, vitality or viability of the area. Hope Street is identified as one of the principal shopping streets.
- 4.4 The supporting text to the policy identifies that the expansion of ground floor non-retail units in shopping streets can be of little interest passing shoppers and represent dead frontage. The supporting text identifies that an over concentration of such usage in a small area disrupts the retail attraction of shopping streets, associated pedestrian flows and the visual quality of the Wrexham Town Centre conservation area. The supporting text goes on to indicate that the Council seeks to maintain the shopping streets of Wrexham Town Centre by resisting further pressure for ground floor non-retail uses where proposals would lead to an over concentration of such uses.
- 4.5 Policy S3 of the UDP goes on to indicate that Wrexham Town Centre will also be preferred location for non-shopping uses, such as offices providing services to the public at large and for major leisure uses. The policy states proposals for such uses will be permitted within the town centre where they are accessible to public transport facilities. There is a presumption against such uses outside of town centres.
- 4.6 Policy EC7 relates to conservation areas. It states that within conservation areas the priority will be to preserve/ enhance those buildings and other elements which contribute to the unique character of the area. Any alterations or additions

to buildings must reflect the design and character of the area as a whole and the form, scale, detailing and materials of the existing buildings.

- 4.7 Policy GDP1 of the UDP sets out overarching development principles. Amongst other things it identifies that development should take account of personal and community safety and security, ensure safe and convenient pedestrian access, and secure stable communities, through the promotion of the economic, social and environmental wellbeing of the area.

Planning Policy Wales (PPW)

- 4.8 Planning Policy Wales provides policy guidance for primary and secondary shopping areas. It notes that although retailing should underpin retailing commercial centres, it is only one of the factors which contributes towards their vibrancy. It states policies should encourage diversity of uses in centres. Planning authorities should identify which retail and commercial centres in their development plans have primary and secondary shopping areas and these should be identified on the proposals map. The PPW notes that vibrant and viable centres are distinguished by a diversity of activity and uses which should contribute towards the centres wellbeing and success whilst reducing the need to travel. Development plans should include policies to describe the uses that are likely to be acceptable in primary areas. The PPW goes on to indicate that achieving diversity of uses/activities may require a flexible approach to planning. Where the right balance of use activities is not being achieved, planning authorities should consider making changes to the acceptable uses permitted in primary or secondary areas.
- 4.9 The PPW sets out the planning authority should assess retail performance of their Town Centres by monitoring their health and they should use the strategy in their development plan to manage change. Where economic decline is impacting on a retail centres emphasis on retaining A1 uses in premises, either in primary or secondary areas and which have been vacant for a period of time, may undermine the centres viability and vitality. In such circumstances planning authorities should consider how non A1 uses may play a greater role to increasing diversity and reducing vacancy levels.

5. PLANNING CONSIDERATIONS

Principle of Proposed Use

- 5.1 Policy S1 of the Wrexham UDP states that non-retail uses within ground floor frontages in Hope Street will not be permitted if they will have a detrimental effect upon the character, vitality or viability of the area.
- 5.2 The key consideration for Policy S1 is whether the proposed new use would detrimentally affect the character, vitality or viability of the area. It is evident that without the proposed reuse of the site, the unit would be vacant as New Look are relocating elsewhere within Wrexham. The proposal Class A2 use, whilst not being a retail use, will nevertheless result in significant amount of activity as a consequence of both employees located within the unit but more particularly as a result of visitors to the new Job Centre use. There are 51 work coach stations planned for the unit. This would involve at least 51 work coaches along with other associated staff members including security, reception and administrative support. Each employment coach will see two people per hour and consequently during the course of a seven-hour day, would see around fourteen people. As a result, there is most likely to be in the region of seven hundred customers visiting the unit per day, along with the additional 60 employees within the unit, which represents a significant number of people being brought into the heart of the town centre. This additional foot fall would clearly add to vitality and viability in comparison to the zero foot fall associated with a vacant unit.
- 5.3 As a result, the proposal must be considered to have beneficial consequences in terms of vitality and viability and therefore accord with the general thrust of Policy S1 in seeking to maintain vitality and viability.
- 5.4 In addition, the supporting text to Policy S1 refers to problems caused by an over concentration of non-retail uses within small areas of the town centre. In the case of retail frontage in which the application site forms a part, it is clear that the surrounding area is dominated by existing retail uses. Within the retail frontage from the junction of Hope Street/ High Street there are sixteen continuous retail units all of which appear to have an A1 consent before the non-retail Horse and Jockey public house. Whilst a number of these retail units are currently vacant, their use appears to remain retail and therefore there is a strong concentration of retail units maintained in this part of the primary shopping frontage shops. As a result many of the negative issues identified in the supporting text of Policy S1

referring to overconcentration of non-retail uses and dead frontage would not result as a consequence of the proposed change of use. The proposed development will clearly not result in a concentration of non retail uses and this further points towards compliance with the objective of Policy S1.

- 5.5 It also clear that Wrexham Town Centre and the area of Hope Street within which the application site is located, is suffering from significant amounts of vacancy. The contraction of retail uses within town centres is a phenomenon which is occurring across the country, associated with changing retail choices, the growth of internet shopping and other economic and social factors. Like many other town centres Wrexham is suffering from a degree of vacancy which was never previously experienced.
- 5.6 Planning Policy Wales, which postdates the Wrexham UDP by thirteen years, recognises these factors. It sets out that planning authorities should assess retail centre performance and the effectiveness of development plan policies by monitoring the health of town centres. The PPW also states that planning policies should manage change to take action where economic decline is impacting on a retail centre and in particular the appropriateness of retaining A1 uses either in primary or secondary areas. PPW recognises that achieving a diversity of uses and activities require a flexible approach to planning and where the right balance is not being achieved, planning authorities should consider making changes to the acceptable uses in primary shopping areas or the retail commercial and centre boundaries themselves. The area of Hope Street within which the application side is located is showing signs of the issues flagged up by PPW, where vacant units are undermining the vibrancy and vitality of the centre. If vacancy persists there is evidently no draw for customers to visit that part of the centre at all, which only leads to a further spiral of decline. The proposal will reuse the existing building and draw to it circa 750 people per day which is a significant factor when considering vitality and viability. The approach set out in PPW relative to retail areas, which is more up to date than Policy S1 of UDP, is a significant material consideration in favour of the proposed change of use.

Other Policy Considerations

- 5.7 Policy S3 of the UDP deals with non-shopping key town centre uses and this would include the proposed Job Centre which falls within class A2. The policy states that in order to sustain and enhance the vitality and viability, Wrexham

Town Centre will be preferred location for non-shopping uses such as offices providing services to the public at large. The policy makes it clear that it is the Town Centre which is the preferred location for such developments. As a consequence, the proposal complies with the requirements of Policy S3 in locating the use within the town centre. Similarly, the planning application also accords with the requirements of the PPW which points towards providing facilities such as the proposed Job Centre within location which are highly accessible to range of transport modes including public transport. Consequently, whilst there is some conflict with Policy S1 of the UDP, other development plan policies such as S3 and the significant material considerations, such as the policy support given in the PPW, that are clearly in support of the proposed use.

Other Material Considerations

- 5.8 The proposed Job Centre is an initiative of the Works and Pensions Department of Central Government to respond to the economic consequences of the Covid-19 pandemic. It is specifically aimed at improving the economic circumstances of local areas across the UK by assisting those who have lost their jobs as a consequence of Covid-19 getting back into work. The need for these facilities is immediate as it is to address the immediate consequences of the Covid-19 pandemic on the national economy. As a result, it is imperative that the initiative can be started immediately to help those that have the immediate need for assistance in getting back into the jobs market and therefore contribute towards the nations economy. As a result, any premises where such facilities are being provided must be capable of being implemented quickly. The application site represents an ideal central location, accessible to a range of transport opportunities to provide such a facility. The fact that the shop unit is vacant means it can be brought back into use quickly. In addition as the application involves a shop unit, means that there is minimal change required to allow access for members of the community. This includes such factors as having a level and wide threshold so that it is accessible by all of the community, as well as being in a location which is also as accessible as possible. These are further factors which represent significant material considerations in support of the proposal.

6. CONCLUSION

- 6.1 The conclusion involves the change of use from a vacant retail unit into a Job Centre aimed at improving the opportunities of those who have lost their jobs as a consequence of the Covid-19 pandemic regaining employment. As it is specifically aimed at those that have been adversely affected as a result of Covid-19, there is a requirement to bring forward the proposal as soon as possible following the removal of any lockdown measures, so as to get people back into the workplace as soon as possible.
- 6.2 The proposal will reuse an existing retail unit for the purposes of the Job Centre. Once fully operational in the region of 750 people per day would visit the site adding to vitality and viability in the town centre. There will clearly be spin off potential from this number of people visiting the town centre for specific purpose of receiving job training, which would potentially support existing businesses in Wrexham. In itself 750 extra people in the town centre would clearly enhance vitality and viability in comparison with what would otherwise be a vacant unit. As a result the proposal complies with the key aspiration of Policy S1 of the UDP in maintaining vitality and viability.
- 6.3 In addition it is clear that this portion of Hope Street maintains an almost entirely retail use. There is limited, if any, non-retail uses permitted within the particular retail frontage within which the application site is located. As a result the proposal will not result in any concentration of non-retail uses which could undermine pedestrian flow or vitality.
- 6.4 It is also evident that Wrexham Town Centre and this part of Hope Street in which the application site is located is suffering from significant levels of vacancy. Without the proposed reuse of the application site, the number of vacant units would increase and this will only undermine the attractiveness of this part of the centre. The proposed use, in bringing circa 750 additional people to the site would have the opposite effect, in it would improve vitality and viability.
- 6.5 Overall proposal will deliver significant benefits to the town centre and in particular the economic and social objectives of Planning Policy for Wales in supporting the local economy and giving training and opportunities to local people. As a result it represents a sustainable development which consists with the overarching objectives of both the Wrexham UDP and Planning Policy Wales.