JMS PLANNING & DEVELOPMENT

PLANNING, DESIGN AND ACCESS STATEMENT IN SUPPORT OF A PLANNING APPLICATION BY GREGGS PLC

FOR

THE CHANGE OF USE TO A MIXED A1/A3 USE, INSTALLATION OF PLANT, DISPLAY OF SIGNAGE, AND ASSOCIATED WORKS

AT

UNIT 1A
DOLYDD ROAD
WREXHAM
LL13 7TF

January 2026

Client: Greggs PLC
Project: Greggs Wrexham – COU
Date: January 2026

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SECTION 1: INTRODUCTION

1.1 JMS Planning have been instructed by Greggs PLC (the Applicant), to submit a full planning application to Wrexham County Borough Council (the Council) for the change of use to a mixed A1/A3 use, erection of plant, display of advertisement and associated works at Unit 1A, Dolydd Road, Wrexham.

1.2 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. Design and access are explored in Sections 6-13 with conclusions based on the above drawn within Section 14.

SECTION 2: SITE AND SURROUNDING AREA

2.1 The application site lies entirely within the defined settlement boundary of Wrexham. The LDP identifies Wrexham as the principal town in the County Borough which plays a pivotal role, not only for the county by the North Wales Region. It is the hub of the local transport network and is where most of the main retailing, employment, leisure and public services are concentrated, for these reasons, Wrexham is most suited to significant additional development

2.2 Wrexham is one of the largest Towns in North Wales and forms part of the National Growth Areas, as identified within Future Wales (The National Plan 2040). Future Wales notes that Wrexham (and Deeside) will be the main focus for growth and investment in the North region, acknowledging that the Wrexham area is the region's main centre of population, employment and services.

2.3 The application site forms part of the former Phoenix Healthcare manufacturing and distribution centre, which comprised of the adjacent units to the application site and in total, measured over 1000 square meters of industrial space. The distribution centre no longer operates and has been vacant for nearly a year.

2.4 The immediate vicinity is characterised by the Phoenix Healthcare industrial buildings, and various buildings associated with Wrexham Hospital, such as the outpatients unit, psychiatric unit, health centre, training centre etc. However, there are also residential properties within the nearby vicinity, namely the dwellings along Dolydd Road.

2.5 In the wider area, there is a diverse range of facilities and services which cater for the needs of the population of Wrexham and further afield, such as Schools, community facilities including a leisure centre, train station, doctor surgery, sports clubs (football, rugby etc) and open spaces. Together, these provisions demonstrate the area's strong level of sustainability and a suitable location for the proposed development.

2.6 The application site is located within Flood Zone 2 of the Flood Map for Planning contained in Technical Advice Note (TAN) 15: Development and Flood Risk

(2021). Further detail is provided within Section 13 and the accompanying Flood Consequence Assessment.

2.7 The application site avoids statutory designations such as SSSI, SPA, SAC, Conservation Areas, and RIGS. There are no known other designations at the site. Whilst it is acknowledged that the former Pheonix Distribution Centre was operating from the application site, the proposed area is not allocated within the LDP as employment land, or for any other use.

SECTION 3 PLANNING HISTORY

3.1 A review of the application site's planning history has been undertaken using the Council's online database. Wrexham County Borough Council's planning portal has highlighted the following planning application on the site which relates to its previous use as a healthcare distribution warehouse (B8 Use), known as Phoenix Healthcare Distribution.

Application Reference	Address	Description	Decision
P/2008/1223	PHOENIX HEALTHCARE DISTRIBUTION LTD DOLYDD ROAD	NEW LOADING CANOPY	Granted - 13/1/2009
P/2009/0306 (Advertisement Consent)	ERECTION OF EXTERNAL MOUNTED WALL CLOCK	PHOENIX HEALTHCARE DISTRIBUTION LTD DOLYDD ROAD	Granted 02/11/2009
P/2025/0264	WAREHOUSE, DOLYDD ROAD, WREXHAM, LL13 7TF	CHANGE OF USE OF BUILDING TO CLASS D2 (ASSEMBLY AND LEISURE)	Live Application – Currently being assessed.

SECTION 4: THE APPLICATION PROPOSAL

4.1 This planning application seeks full planning permission for the change of use of the building from B8 to mixed A1/A3 use. The proposed occupier of the premises is Greggs.

4.2 The proposal utilises the existing building without the need for any extensions or demolitions.

4.3 The unit has a gross floor area of approximately 160sqm. Internally, two thirds of the footprint is to be for the 'back of house' area which includes the food preparation area, staff toilets, storage, and staff resting area. To the front of the building, the main entrance will lead into the counter and serving area with a seating area (approximately 10 seats).

4.4 Externally, only minimal alterations are proposed. To the front elevation, where the existing roller shutter door is located, a new glazed shopfront with double manual doors is proposed. The existing single door is to be blocked and finished with brick to match the existing. Above the new doorway, a slimline fascia-type illuminated sign is located, displaying the Greggs logo. To the rear elevations, only one change is proposed with the installation of Greggs advertisement measuring 3.6 meters in with and 1.1 meters in height located some 2.8 meters from the floor. The side elevation accommodates a new fire escape, A/C condensing units, extraction grilles and a fascia type advertisement.

The Occupier - Greggs

4.5 Greggs PLC are proposed as the occupier of the unit. 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 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.

4.6 As confirmed by the Chief Executive 'it is a duty as a modern business to stand for more than just profit' and in April of this year published 'The Greggs Pledge'.

4.7 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

4.8 '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 of April 2024 there are over 890 Breakfast Clubs operating across the UK every day. Each school day, these school clubs serve a nutritious breakfast, free of charge, to over 62,000 primary school children making sure they have the energy to concentrate and learn.

4.9 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.

4.10 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

4.11 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.

4.12 In Greggs' manufacturing sites, food waste has been reduced by 32% since 2018, exceeding the set target of a 25% reduction. During 2023, Greggs' stores managed to save nearly 42% of unsold food from going to waste — an increase of 4% on 2022.

4.13 Greggs aim 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 courses has increased ten-fold over the last five years and the company has ambitious plans to grow this more in the years ahead.

4.14 In 2023, Greggs maintained a network of 956 local charities which pass surplus food on to people in need. Greggs gave away over 1,000 tonnes of food this way in 2023.

4.15 Furthermore, over 1,000 shops now feature on the 'Too Good To Go' app which gives Greggs another channel to redistribute unsold food. Through the app, Greggs sell 'Surprise Bags' worth around £8 for just £2.59. During 2023, Greggs sold 1.3 million discounted Surprise Bags to customers, an increase of almost 20% compared with 2022.

Supporting our Communities

4.16 Greggs now have 35 'Outlet shops' around the UK where day old food products are sold at a reduction helping people to spend less on food. These are located in areas where social deprivation is high. As part of plans for 2024, Greggs intend to trial the addition of a dedicated and responsive delivery service. This will involve vans travelling around a local area and ensuring that shops' surplus food is delivered to a nearby Outlet shop.

4.17 The outlet shops were originally introduced to help avoid sending edible food to land fill. We now see that these shops can do even more; we donate a share of all our profits from these shops to the Greggs' Foundation which passes it on to local community groups that are working to address food poverty and associated problems.

Helping our Customers to make Healthier Choices

4.18 In 2023, Greggs far exceeded their target for 30% of the items on their shelves to be healthier choices. In fact, 40% of the range was a healthier option. Greggs define a 'healthier option' as one that contains fewer than 400 calories and with no red traffic lights, based on the UK Government's voluntary nutrition labelling scheme.

Net Zero Carbon

4.19 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 97.1% 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.

4.20 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.

4.21 The majority of Greggs' direct emissions come from three sources: diesel and petrol for their vehicles, gas for cooking and heating water, and refrigerant gas. They are taking steps to reduce the carbon impact of all three

4.22 Greggs continue to migrate their company car fleet to electric or hybrid vehicles and are building a charging network into our manufacturing and logistics sites, as well as at Greggs House. By 2035, Greggs want to have a net-zero fleet.

4.23 Greggs no longer install gas boilers when they open a new shop or refit an existing one, with the intention of going entirely electric over time. In the meantime, they have increased the amount of renewable gas they purchase by 30% and are on track to get to 100% by 2025.

4.24 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

4.25 In 2022, Greggs opened their first Eco-Shop in Northampton, testing 20 different green initiatives which, between them, cut energy use by a fifth compared with a standard shop. Greggs are committed that by 2025 25% of their shops will feature elements from their eco-shop 'store of the future' design.

4.26 In 2023, Greggs set themselves the target to introduce ideas from their Eco-Shop into over 500 shops. They achieved it, meaning that 21% of their estate now features some form of resource saving technology. Greggs will meet their 2025 target of 25% at least a year ahead of schedule.

Using Less Packaging

4.27 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.

4.28 Greggs have tackled single-use plastics, eradicated unnecessary packaging, and reduced their use of things like stretch-wrap film and plastic trays. Optimising the amount of packaging used is complex — using too much is a waste of resources, but remove too much and the product is more likely to get damaged and wasted; but Greggs are always looking for that perfect balance. In 2023, they saved 14 tonnes of cardboard by reducing the weight of the lids on our two-pack sweet treats and Belgian Bun box.

4.29 In 2021 Greggs joined the "On Pack Recycling Label" (OPRL) scheme to make recycling communications for customers easier to understand. Now, 100% of



Greggs branded printed packaging now carries a simple, recognisable recycling icon, helping our customers to get our packaging into the correct bins.

Embracing Diversity

4.30 Greggs are committed to ensuring that by 2025 the workforce will represent the communities which they serve.

4.31 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.

Sourcing Sustainably

4.32 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'.

4.33 Greggs have clear environmental and social standards and requirements that their suppliers must meet if they want to do business with them. Examples include the Modern Slavery Policy which ensures that sound social and ethical practices are upheld, the Greggs Farm Animal Welfare Strategy which sets out how they expect animals in their supply chain to be treated, and ingredient-specific standards for commodities such as soy, palm oil, beef, and cocoa contained within their Responsible Sourcing — Deforestation Polic

Protecting Animal Welfare

4.34 Greggs are committed to securing and maintaining Tier 1 in the BBFAW Animal Welfare Standard by 2025.

4.35 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

4.36 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'.

4.37 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.

4.38 The Community Urban Rivers Regeneration Fund provides funds to river trusts to run educational and community based environmental projects based on urban rivers.

4.39 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.

4.40 The North East Core Fund makes grants to charitable organisations based on the North East of England, who make a different 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.

4.41 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.

4.42 In 2023, the Foundation provided more than £1.4m in small grants to individuals and families in financial crisis. These grants were specifically for essentials such as household appliances, beds and bedding, clothing, food, or utility vouchers. Almost half of the grants were for families in the Foundation's school network.

The Application

4.43 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.

4.44 It is envisaged that a Greggs of this size will generate an equivalent of 5 full-time and 10 part-time jobs. Accordingly, whilst it is considered that this proposal will meet an identified need in the wider area, the proposal will also contribute to the provision of jobs within this area.

4.45 The proposed Greggs bakery is considered to offer a beneficial service to the workers and staff of the area by providing an accessible, attractive and affordable bakery bringing lunching opportunities on site.

4.46 Planning permission is sought for the unit to operate between 6am–6pm Monday to Saturday, and 8am–4pm on Sundays to ensure the needs of the target demographic.

SECTION 5: PLANNING POLICY CONTEXT

National Policy Wales

Future Wales: The National Plan 2040

5.1 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.

5.2 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.

5.3 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.

5.4 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.

5.5 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.

5.6 Future Wales sets out a clear vision of what it seeks to achieve by 2040 in 11 outcomes. These are as follows:

(i) A Wales where people live and work in connective, inclusive and healthy places;

(ii) A Wales where people live in vibrant rural places with access to homes, jobs and services;

(iii) A Wales where people live in distinctive regions that tackle health and socio-economic inequalities through sustainable growth;

(iv) A Wales where people live in places with a thriving Welsh language;

(v) A Wales where people live and work in towns and cities which are a focus and springboard for sustainable growth;

(vi) A Wales where people live in places where prosperity, innovation and culture are promoted;

(vii) A Wales where people live in places where travel is sustainable;

(viii) A Wales where people live in places with world class digital infrastructure;

(ix)A Wales where people live in places that sustainably manage their natural resources and reduce pollution;
(x) A Wales where people live in places with biodiverse, resilient and connected ecosystems;
(xi) A Wales where people live in places which are decarbonised and climate resilient.

5.7 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 set at compatible 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.

5.8 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.

5.9 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 (Edition 12)

5.10 Planning Policy Wales Edition 12 published in February 2024 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.

5.11 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).

5.12 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 cultural 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).

5.13 The PPW promotes action at all levels of the planning process, which is conducive to maximising its contribution to the wellbeing 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).

5.14 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.

5.15 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.

5.16 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).

5.17 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).

5.18 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).

5.19 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).

5.20 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).

5.21 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.

5.22 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.

5.23 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.

5.24 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 wellbeing 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.

5.25 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).

5.26 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).

5.27 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).

5.28 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.

5.29 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).

Technical Advice Notes (TAN)

5.30 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
- TAN18 – Transport
- TAN20 – The Welsh Language
- TAN22 – Planning for Sustainable Buildings
- TAN23 – Economic Development

Local Planning Policy

5.31 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.

5.32 The adopted development plan is Wrexham County Borough Council Unitary Development Plan (UDP) 1996 – 2011. The Wrexham Local Development Plan 2 (LDP2) 2013-2028 was unadopted and therefore afforded no weight in determination.

5.33 The relevant Local Planning Policies from the UDP are briefly outlined below, comprising of strategic policies and general development principles:

- Policy PS1
- Policy PS2
- Policy PS3
- Policy PS4
- Policy PS11 (Biodiversity)
- Policy GDP1 (Development Objectives)
- Policy EC6 (Biodiversity Conservation)
- Policy EC12 (Development and Flood Risk)
- Policy EC13 (Surface Water Run-Off)

- Policy S6 (Local Need Shopping)
- Policy T8 (Parking)

5.34 Policy PS1 notes that new development for housing, employment, and community services will be directed to within defined settlement limits/employment areas. Whilst employment uses are often seen as those designated as B1, B2 and B8 uses, retail development is also considered employment use, as confirmed by TAN23. For the purposes of this report, the proposal is considered retail development but consideration has been given to the employment nature of the proposal.

5.35 Policy PS2 states that development must not materially detrimentally affect countryside, landscape/townscape character, open space, or the quality of the natural environment. This reports provides further information and justification in Section 6.

5.36 As highlighted in Policy PS3, development should use previously developed brownfield land comprising vacant, derelict or underused land in preference to the use of greenfield land, wherever possible. The application site is located at a former manufacturing and distribution and utilising the existing building as opposed to constructing new development on greenfield land.

5.37 In accordance with LDP Policy PS4 notes that development should maintain the existing settlement pattern and character and be integrated with the existing transport network to help reduce the overall need to travel and encourage the use of alternatives to the car. Given that the proposal utilises the existing building with minor alterations internally and externally, the scheme is unlikely to detract from the pattern and character of the surrounding area. Owing to the sustainable transport network within the vicinity, including multiple bus stops, train station and active travel linkages, the site is well connected, promoting more sustainable methods of travel. Whilst the site can be accessed via multiple means of travel, the target demographic is likely to attend site via foot.

5.38 Policy PS11 encourages proposals which improve the biodiversity value of sites and to the establishment of local nature reserves where the nature conservation and landscape interest of the land will be protected and enhanced. Although the site is of little ecological significance, there are opportunities to promote and

strengthen green infrastructure at the site, which is commensurate to the size and scale of the proposal.

5.39 Policy GDP1 relates to all types of development and outlines the general development principles to consider as part of a planning application, including size, scale, and design. Safety to the community, public, and vehicles is paramount as is safeguarding the amenity of the surrounding environment. This includes nearby residential dwellings and other sensitive receptors, such as the hospital. The policy supports sustainable development through safeguarding the ecological environment, social environment and built environment which relates to topics such as flooding, well-being and Welsh culture.

5.40 There are no known sites of biodiversity interest within the immediate vicinity, however, there may be opportunities to provide small-scale improvements to green infrastructure and biodiversity net gain, proving compliance with the general thrust of LDP Policy EC6.

5.41 Policy EC12 is of relevance as the application site is located within Flood Zone 2 (Rivers and Sea) as denoted within the Flood Map for Planners (FMfP). LDP Policy EC12 notes that development within defined flood plains will only be permitted if it would not be subject to an unacceptable risk of flooding, does not result in unacceptable risk of flood and does not adversely affect flood management or maintenance schemes.

5,42 Similarly, LDP Policy EC13 notes that development which would result in an unacceptable adverse impact on the water environment due to additional surface water run-off will not be permitted. Given that the proposal sees no changes to the footprint, the level of surface water run-off will not be affect.

5.42 The application is supported by a Flood Consequence Assessment in accordance with Technical Advice Note 15 and concludes that the site is of low risk of flooding and deemed acceptable.

5.43 Possibly most pertinent to the proposal is the principle of the development, whereby LDP Policy S6 highlights that small-scale shopping developments will be allowed within settlement limits providing the development is safely accessible for customers on foot, the development does not harm residential

amenity, does not give rise to traffic problems and the sales floor area of each development does not exceed 300 meters.

5.44 Whilst it is acknowledged that the application site is not located within the Wrexham Town Centre or District Shopping Centre, the application site is located within the settlement boundary.

5.45 Supporting text of LDP Policy S6 acknowledges that there may be a role for local need shops that cater for the day-to-day needs of consumers in the immediate area and are conveniently accessible on foot. The applicant operates 3no retail stores within the town centre boundary, however, the applicants have identified additional need outside the town centre boundary.

5.46 The proposal accords with the criterion set out within LDP Policy S6 as the sales floor area is considerably lower than the permitted 300 square meters with the sales area measuring approximately 100 square meters. The application site benefits proximity to an active travel route located approximately 30 meters to the East of the application site and a pavement to the North of the site. It is envisaged that the majority of the customers will attend the site via foot or via sustainable travel options such as buses or cycling which reduces the reliance on private car travel, and therefore will unlikely give rise to traffic problems.

5.47 The proposal is also unlikely to give rise to any amenity issues in relation to nearby residential properties. The building will not require any amendments to the building which would increase the size or scale, therefore, the building us not considered to overshadow the residential properties, or result in the loss of light. Given the fallback position and existing lawful use of the building as a manufacturing and distribution, there is likely to be a betterment to the residential amenity by virtue of less traffic volume, less noise in comparison to the distribution centre.

5.48 LDP Policy T8 states that development granted planning permission will be required to provide vehicle parking spaces either on site or nearby but acknowledges that regard will be given to the availability of public transport, public car parking areas, and road safety/amenity issues arising from on-street car parking. Further detail and justification is provided in Section 12 to prove accordance with Policy T8.

5.49 In summary of the principle of development, the proposal is considered to accord with the strategic and general development principles, by virtue of the conversion of an existing vacant building within the Wrexham settlement boundary. The provision of a small-scale retail unit (mixed A1/A3) is considered to accord with LDP Policy S6 as the site is easily accessible on foot with less amenity impact in comparison to the existing lawful use. The sales floor measures approximately 100 square meters, well-below the permitted 300 square meters.

SECTION 6: DESIGN

6.1 A key principle in successful development is the regeneration of brownfield sites and the re-use of an existing building. The proposal is small in scale, comprising minimal internal works, alongside minor external alterations.

6.2 The existing roller shutter door opening to the front elevation will be retained but upgraded with a new flush, glazed aluminium shopfront. Signage is proposed on the shopfront fascia to advertise the business. This will include the Greggs lettering and logo placed above the entrance as a fascia sign. Two A/C units are also proposed on the side elevation, positioned so as not to be visible from the front and screen by the existing hedgerow. Overall, the external alterations are sympathetic to the surrounding area and will ensure the development integrates well with the existing streetscene, in accordance with design policies.

6.3 The proposal will deliver a high-quality finish that respects the local vernacular while introducing a modern feel, thereby enhancing the character of the surrounding area. The improved appearance of the building will contribute positively to the wider streetscene and support the business by creating a more attractive shopfront. The surrounding area is mainly characterised by industrial and D1 class use buildings and whilst of no architectural significance they do contribute to the context of the area, which will not be harmed or adversely affected as a consequence of the development. Moreover, the proposal will positively contribute to the site and surrounding area in accordance with LDP Policy GDP 1.

6.4 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 unit, therefore enhancing the visual amenity of the site.

6.5 Internally, the proposal is designed to provide an efficient layout that benefits both customers and staff. Utilising the exiting floor area, the proposal reconfigures the layout for the A1/A3 use by creating a 'back of house' area with

sufficient space for storage and staff facilities. The sales area to the front of the unit provides a small seating area of 10 seats to allow customers to dine inside.

SECTION 7: SIZE AND SCALE

7.1 The proposal relates to an existing building. The size and scale of the building is commensurate with the surrounding and nearby buildings, and as the building is already in-situ, the size in not considered to raise a concern. No extensions are proposed, and Greggs will utilise the space as it currently stands, thus no rise in scale or massing.

7.2 Internally, the total gross floor area measures approximately 160 sqm, with the gross sales and seating area measuring some 60 sqm.

SECTION 8: PROPOSED SITE LAYOUT

8.1 The proposed site layout is designed in a way to be legible to prospective purchasers. From the entrance the main counter will be visible and suitably placed to welcome customers and offering an active shopfront. The small seating area will be easily accessible from the entrance.

8.2 The layout of the scheme has been carefully designed to allow the best and most efficient use of space and ease for both staff and customers. HVAC will be positioned internally with the duct exiting the side elevation.

SECTION 9: COMMUNITY SAFETY

9.1 Consideration has been given to creating an attractive safe environment with the introduction of crime prevention measures and the use of Secured By Design principles.

9.2 The retail unit will operate video surveillance (CCTV) to deter and discourage crime or anti-social behaviour. Furthermore, as outlined within this statement, the proposal demonstrates good design principles which aid natural surveillance from within and outside of the site.

9.3 The site currently benefits from the street lighting which will ensure that the walkways are suitably illuminated, which can create a sense of safety and reduce fear of crime, whilst aiding visibility in late afternoons and evenings.

SECTION 10: LANDSCAPING / BIODIVERSITY

10.1 At present there is limited landscaping at the application site, owing to its urban location. The site and surrounding land are relatively level and free from any obstacles.

10.2 This area, which mainly comprises of a mixture of uses, including industrial uses is lacking in soft landscaping. However, the proposal includes the biodiversity enhancements and retention of green infrastructure. Further details can be found in the accompanying Green Infrastructure Statement.

SECTION 11: SURFACE WATER

11.1 There will be no changes to the existing treatment and capture of surface water.

SECTION 12: ACCESS

12.1 The application site is located directly off Watery Road, a County Class C road with a maximum speed limit of 20mph. Whilst the application site is accessible via car, the main means of access will likely be by foot with potential customers already being within the vicinity, for example, hospital staff workers, staff from various nearby units, such as those along Ellice Way or customers of the retail units to the South of the site such as Morrisons and Aldi.

12.2 The site benefits an active travel route from the South of the site and terminating some 30 meters East of the site. Footways and dropped kerbs are provided to the North of the allowing safe and easy use for pedestrians.

12.3 The application site benefits proximity to other sustainable means of travel, such as bus stops and train stations, with the nearest bus stop some 120 meters to the East, and Wrexham Central train station a further 230 meters to the East.

12.4 There are numerous large car parking areas within close proximity of the site, however, there will some informal car parking areas accessible at the site, although this will not be encouraged.

12.5 With the application area, the site allows accessibility for less able-bodied members of public to reach all areas of the shopping zone. The layout and design of the unit itself has considered ease of access for all walks of life. The proposal opts for level thresholds at the access to ensure the unit can be accessed by less able-bodied and disabled users.

12.6 Within the unit itself, access throughout the application site has been carefully considered to promote ease of manoeuvrability to all facilities such as seating area, counters, and tills.

SECTION 13: FLOODING

13.1 The application site is located within Flood Zone 2 of the Flood Map for Planning (FMfP), as contained within Technical Advice Note 15 (TAN15).

13.2 The existing building and use is considered 'low vulnerable' and the proposed change to a retail unit will remain 'low vulnerable' development, therefore no change to vulnerability is proposed.

13.3 In accordance with TAN15, a Flood Consequence Assessment (FCA) was undertaken and concluded that the flood risk at site is considered low. Flood consequences are deemed acceptable and prove compliance with tolerable conditions as set out within Section 11 of TAN15.

SECTION 14: CONCLUSION

14.1 This Planning Design & Access Statement has been prepared by JMS Planning on behalf of the applicant, Greggs PLC, in support of a planning application for the change of use of the building to mixed A1/A3 use, installation of plant, display of advertisement and associated works.

14.2 It is considered that the proposed use will support the surrounding area by providing convenient, quick dining options for residents and workers in accordance with LDP Policy S6.

14.3 The proposal will contribute to making the area more attractive and sustainable by offering new facilities, which are accessible by public services and active travel means, whilst also creating several valuable jobs on site.

14.4 The proposal utilises an existing brownfield site, which is vacant, thus promoting efficient use of land in accordance with Future Wales. The re-use of the building has a positive impact on the site and surrounding area in terms of amenity and visual betterment, with a reduction in other amenity impacts associated with the former health care distribution use.

14.5 The proposal complies with both National and Local Planning Policy. Based on the above, it is respectfully requested that planning permission be granted, as this proposal offers social, economic and environmental benefits to the area.