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26 June 2026

Dear Sir or Madam,

Town and Country Planning Act 1990
Full planning application for the proposed change of use of 28 Eagles Meadow Shopping Centre, from a shop (within Use Class A1) to a retro gaming lounge (unique use)
28 Eagles Meadow Shopping Centre, Wrexham LL13 8DG

Asbri Planning Ltd is appointed as planning agent to MB Games Ltd in respect of the above referenced full planning application for the proposed change of use of 28 Eagles Meadow Shopping Centre, from a shop (within Use Class A1) to a retro gaming lounge (Unique Use) at 28 Eagles Meadow Shopping Centre, Wrexham LL13 8DG.

The planning application has been submitted via the Planning Portal. In addition to this covering letter, the planning application submission comprises the following documents:

- Completed Application Forms;
- Site Location Plan;
- Existing Floor Plan

Site Description & Surroundings
The application site is Unit B5, a ground floor retail unit situated within the eastern courtyard of Eagles Meadow Shopping Centre. The site is located at the eastern edge of Wrexham Town Centre and is currently occupied by Barnardo's. The unit is served by two pedestrian entrance points, via the shop frontage onto the courtyard and to the rear of the unit. Servicing and deliveries are achieved via an under-croft servicing area accessed from the A525.

In respect of surroundings, the application site is bound by retail and leisure units which make up the wider Eagles Meadow Shopping Centre. This includes shops (use class A1), food & drink (use class A3) and leisure (use class D2) uses, reflecting the predominance of town centre type uses in the locality. The application site lies in an inherently sustainable location in Wrexham Town Centre in close proximity to a comprehensive range of services and facilities.

The site occupies a highly accessible location with excellent linkages to the highway network in addition to well served public transport routes and opportunities for active travel. As noted above, the A525 is located a short distance south of the site. Two bus stops are found in the immediate vicinity of the site, at Smithfield Road and Salop Road, providing access to the following routes/services: 7 (Wrexham – Caia Park), TL3 (Wrexham – Abenbury), 42 (Wrexham – Hightown) 146 (Wrexham-Whitchurch). The nearest train station is Wrexham Central, found approximately 750 metres west of the site; providing access to the Transport for Wales service to Bidston. The principal train station in the town is Wrexham General, which is located approximately 1.1km north west of the site, providing access to the Transport for Wales services to Cardiff Central, Chester, Holyhead, & Birmingham International. In terms of active travel, pavements line the outer perimeter of the shopping centre, which is also served by an internal pedestrianised area, creating a traffic free environment. The Wrexham Active Travel Network

map indicates that many of the streets in the immediate vicinity of the site are identified as future walking and cycling active travel routes.

Spatial & Environmental Constraints

The Natural Resources Wales TAN 15 Flood Map for Planning (Fig 1) indicates the site is located within Flood Zone 2 in respect of flood risk emanating from Rivers. The site is located within Flood Zone 2 in respect of flood risk emanating from surface water and small watercourses.

The Cadw Designated Heritage Assets mapping (Fig 2) indicates the subject site does not contain any listed buildings, scheduled monuments or historic parks and gardens, nor are any found in the immediate vicinity of the site. The Historic Wales heritage portal (Fig 3) indicates the site does not contain any records from Historic Environmental Records (HER) & National Monuments Records of Wales (NMRW) .

The Mining Remediation Authority Map Viewer (Fig 4) indicates the subject site is situated within the Coal Mining Reporting Area but is outside of the Development High risk Area. On this basis, the proposals are highly unlikely to be constrained by Coal Mining Legacy.

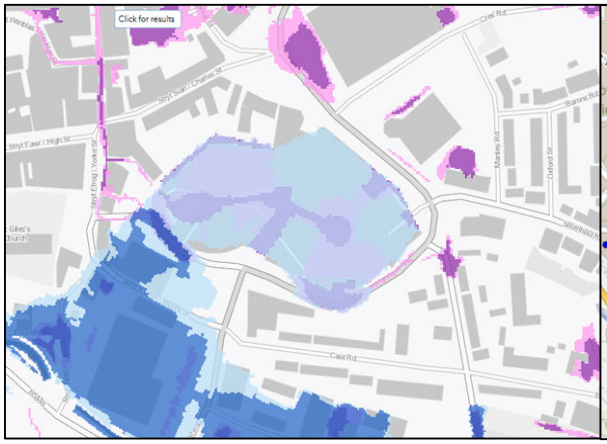


Figure 1: Flood Map for Planning, NRW

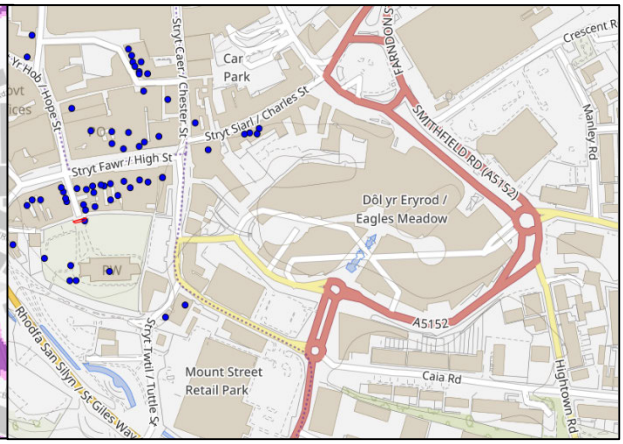


Figure 2: Historic Assets, Cadw

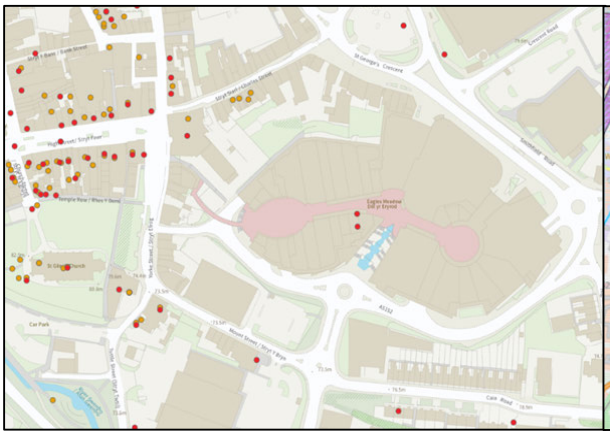


Figure 3: Historic Environment, Historic Wales

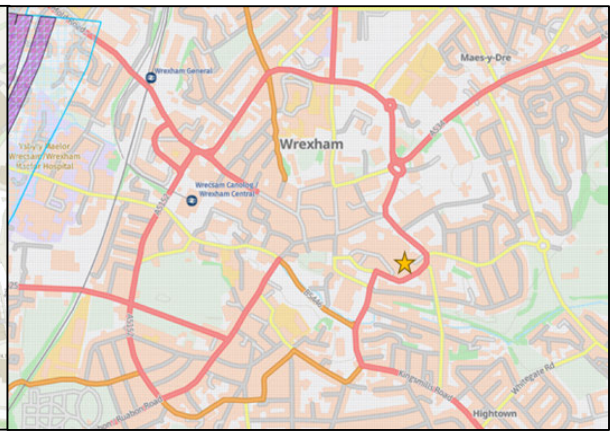


Figure 4: Coal Mining Reporting Area, Coal Authority

Planning History

Asbri Planning have undertaken a review of the Wrexham Council online planning register, which has not identified any historic planning applications associated with the subject site.

Proposal
The application proposals seek the change of use of 28 Eagles Meadow Shopping Centre, from a shop (within Use Class A1) to a retro gaming lounge (Unique Use). The proposal wholly relates to the existing floorspace and use of the unit, and does not comprise any physical alterations to the exterior of the unit. The scheme will be served by the existing access and parking arrangements which currently serve Eagles Meadow Shopping Centre. Similarly, the established servicing and delivery arrangements will remain unchanged.

The proposed retro gaming lounge will be inviting to all ages, including families, groups and individuals with no age restriction. The applicant has several similar premises across other parts of the UK and operates under a successful business model. This includes a fee being payable to enter the premises which thereby grants access to unlimited game time to all consoles/arcade machines. There will be no slot or coin-based reward games, so the proposal would not be classified as a premises for gambling. The site will provide snacks and drinks (including alcohol) which will be canned/bottled drinks. The sale of such drinks would be ancillary to the overall function of the premises and a separate alcohol licence will be submitted, accordingly.

The proposed hours of opening are as follows;

- Sunday to Thursday 10am to 12am (midnight)
- Friday, Saturday 10am to 2am

Planning Policy Context
Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the purposes of this Planning Application comprises the following:

- National Development Framework: Future Wales – The National Plan 2040 (February, 2021);
- Wrexham County Borough Unitary Development Plan 1996-2011 (adopted February 2005)

In addition to the Development Plan, the Planning Application has been informed by Policy and Guidance set out in the following:

- Planning Policy Wales Edition 12 (February, 2024), informed by The Well-Being of Future Generations (Wales) Act 2015, and supplemented by Technical Advice Notes;
- Wrexham County Borough Local Planning Guidance Notes
- Wrexham Town Centre Masterplan

<u>The Development Plan</u>
The development plan comprises Future Wales – The National Plan 2040 and the Wrexham Unitary Development Plan 1996-2011 (adopted February 2005).

National Development Framework: Future Wales – The National Plan 2040
The National Development Framework: Future Wales – the National Plan 2040 was published on 24th February 2021. 'Future Wales' sets out the Welsh Government's strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy; achieving decarbonisation and climate resilience; developing strong ecosystems; and improving the health and well-being of our communities. As stated, above, the National Development Framework has Development Plan status.

Policy 1 – Where Wales Will Grow indicates *"The Welsh Government supports sustainable growth in all parts of Wales. In three National Growth Areas there will be growth in employment and housing opportunities and investment in infrastructure. The National Growth Areas are:* (inter alia)

- *Wrexham and Deeside"*

Policy 6 – Town Centre First states *"Significant new commercial, retail, education, health, leisure and public service facilities must be located within town and city centres. They should have good access by public transport to and from the whole town or city and, where appropriate, the wider region. A sequential approach must be used to inform the identification of the best location for these developments and they should be identified in Strategic and Local Development Plans."*

The supporting justification texts indicates the Welsh Government have adopted a 'town centre first' approach which "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."

Elaborating upon the role of town centres and illustrating the multi-functional purpose of these spaces, the justification text states *"The impact of COVID-19 on the retail sector is a further driver towards making our town centres multi-functional places. Town centres remain important focal points of communities and are increasingly becoming places to live, centres of community and cultural activity, a focus for public services such as health and education, and the location of new co-working spaces. They are more than the extent of designated retail areas."*

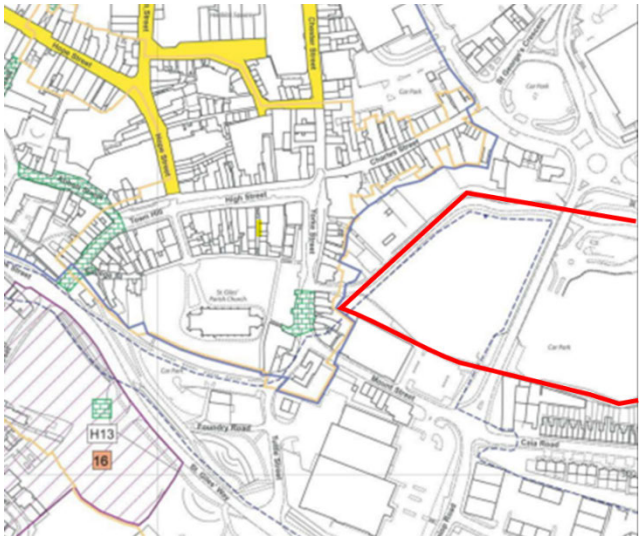
The text highlights the importance of accessibility, stating *"Town centres are the most accessible parts of our towns and should be the focus of growth and regeneration"*.

Examining the anticipated appropriate uses within town centres, the supporting text states *"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"*

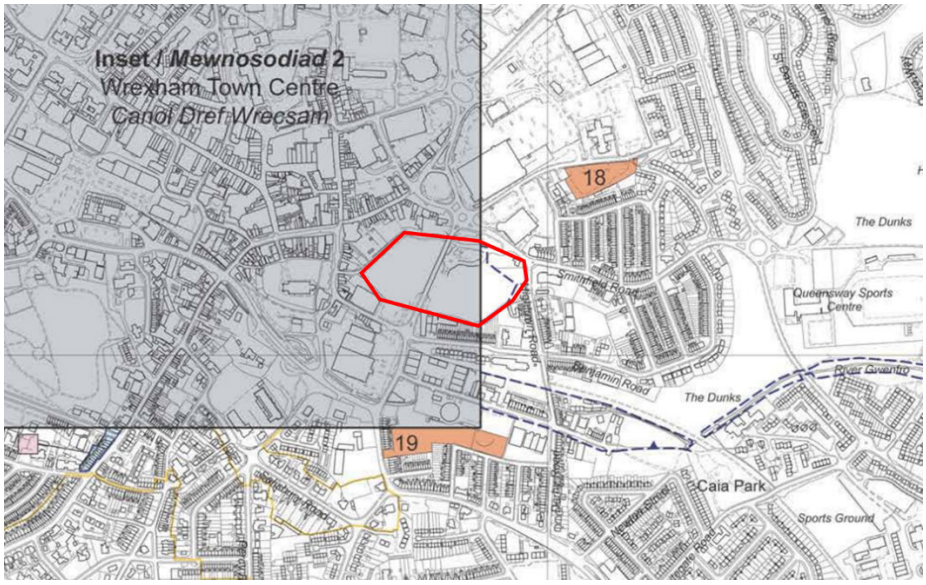
Policy 20 - National Growth Area – Wrexham and Deeside indicates *"Wrexham and Deeside will be the main focus for growth and investment in the North region. Strategic and Local Development Plans across the region must recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing and transport infrastructure."*

Local Level

Wrexham Unitary Development Plan 1996-2011 (adopted February 2005)
The Unitary Development Plan (UDP) was adopted in February 2005 and remains the prevailing development plan for the County Borough Council area. As the UDP predates the construction of Eagles Meadow Shopping Centre, the unit is not shown on the Proposals Map, as illustrated below.



Wrexham Town Centre Proposals map inset - approximate location of Eagles Meadow Shopping Centre (red boundary)



Wrexham Town Proposals map – approximate location of Eagles Meadow Shopping Centre (red boundary)

The application site is located within the defined settlement boundary and is not allocated for a specific land use purpose; therefore representing 'white land', where a range of development may be considered acceptable in principle, subject to compliance with the policies of the adopted UDP. Given the age of the UDP, the application site is not situated within the principal shopping street or defined shopping centre.

The following Unitary Development Plan Policies are considered relevant in the context of the proposed development:

Strategic Policies

The Broad Location of Development
"Policy PS1 New development for housing, employment, and community services will be directed to within defined settlement limits/employment areas."

"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, particularly so where greenfield land is of ecological, landscape or amenity value, or comprises agricultural land of grades 1, 2 or 3a quality."

"Policy PS4 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."

Shopping
"Policy PS7 The priority areas for new shopping and commercial office development will be the defined Wrexham Town Centre and district centre shopping areas."

Specific Policies

Shopping Streets in Wrexham Town Centre
"Policy S2 Outside the principal shopping streets of Wrexham Town Centre, encouragement will be given to ground floor retailing proposals. Mixed use commercial development will be allowed only if it enhances the vitality and environmental quality of the area."

Non-shopping key town centre uses
"Policy S3 In order to sustain and enhance its vitality and viability, Wrexham Town Centre will be the preferred location for non-shopping uses, such as offices providing services to the public at large, and for major leisure uses. Proposals for such uses will be permitted firstly within the town centre where they are readily accessible to public transport facilities, followed by edge-of-centre locations, provided that they are of a scale appropriate to the size and function of the town centre and would help to sustain and enhance the vitality and viability of the town centre as a whole.

As with retail proposals, only where there is a clearly defined need (defined in accordance with individual proposals) which cannot be accommodated on a site or sites in preferred locations, should out of-centre sites accessible by a choice of means of transport, be considered. A developer must demonstrate that all potential sites in preferred locations have been thoroughly assessed, before proposing less central sites for other key town centre uses."

Policy Reference	**Relating To**
Strategic Policies	
Policy PS7	Transport
Specific Policies	
Policy GDP1	Development Objectives
Policy EC12	Development and Flood Risk
Policy E4	Employment Development (of Unannotated Land) Within Settlements
Policy S2	Shopping Streets in Wrexham Town Centre
Policy S3	Non-shopping key town centre uses
Policy T8	Parking
Policy T9	Walking, Cycling and Horse-Riding Routes

Wrexham Town Centre Masterplan

The Wrexham Town Centre Masterplan (adopted in April 2016) was prepared as an evidence base document as part of the now withdrawn Local Development Plan. The Masterplan is to be utilised as a framework for decision making within the defined masterplan area and sets out key objectives against which development proposals will be considered. Regarding the purpose of the Masterplan, paragraph 1.6.1 states *"In the absence of an in-date development plan and in the interim period before the LDP is adopted the Masterplan can, with the evidence base and national policy, help fill the policy gap."*

This is somewhat complicated by the withdrawal of the emerging LDP. However, it is assumed the Masterplan is to be utilised as part of framework to determine relevant planning applications, alongside Future Wales: The National Plan (which, in any case, forms part of the 'Development Plan') and the UDP. Figure 3: Vibrant and Viable Places and Masterplan Area (page 5) indicates that the application site is located within the defined 'Masterplan Area'.

Assessing the characteristics of the town centre, the Masterplan indicates *"While the town centre is relatively healthy and has seen significant growth over the last 20 years there is a sense the town lacks identity, the centre is dominated by discount retailers, lacks an evening economy"*. In the respect of a strategy for the future, the Masterplan states *"the previous model of retail continually driving town centre growth has broken, changes in modern retail, the way people shop and wider economic changes mean that town centre regeneration needs a different model, future growth will come from a greater diversity of town centre uses."*

The Vision for the town centre is set around the need for a new town centre heart with diverse range of accessible shopping, leisure uses such as family restaurants, arts and cultural attractions, niche speciality retail in a quality public realm and environment.

The need for diversity within centres is highlighted within the 'Challenges' section of the Masterplan, which states *"Diversity; shopping areas need the greatest range of retailers and services or they will die"*.

The importance of the evening economy forms a key objective of the Masterplan, which states at section 2, point 4: *"An active town centre beyond the daytime shopping hours will improve the town's vitality and viability, help stimulate investment, increase footfall and improve perceptions of safety. Improving the diversity of evening and night-time uses such as leisure, restaurants and small local convenience stores can make the town more attractive to a wider audience including families, couples, elderly, professionals etc."*

Eagles Meadow Shopping Centre is identified as a 'key retail destination' within figure 8 'retail actions & interventions', which is identified as an area where future retail should be focussed. Again, a diversity of uses is identified as a solution to address vacant units within these areas. Paragraph 3.1.8 states in this regard *"Recognising that retail opportunities may be limited and not wishing to see vacant properties sterilised by holding them for retailers that may never come, a diversity of uses which support the vitality and vibrancy of the core area would be supported subject to retaining its primary retail function. Uses such as leisure, nurseries, gyms, cafés and restaurants and medical facilities which need to be accessible to large numbers of people and can drive footfall through the town centre during the daytime and evening will contribute to the streets vitality and viability."*

Within the Masterplan, the Visitor Action Overview identifies Eagles Meadow Shopping Centre as an Existing Leisure Destination. Paragraph 3.2.7 sets out that *"Wrexham needs a balance between day and night visitors. Increasing dwell time in the town is a key priority to generate greater spend in the local economy."* A range of complementary uses are identified at

Paragraph 3.3.7 also defines 'A Diversity of Uses' and states *"The Masterplan supports the diversification of town centre uses, arts, culture, leisure, that can give the town opportunities to create a positive identity. The strategies for retail, visitors and residential development underpin this element of the strategy"*.

Planning Policy Wales Edition 12

In accordance with the Well-Being of Future Generations (Wales) Act 2015, the primary objective of PPW, as set out at Paragraph 1.2, is *"to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales"*.

PPW sets out that, in order to maximise well-being and the creation of sustainable places, the concept of 'placemaking' should be at the heart of the planning system. It is stated at Paragraph 2.8 that development

proposals *"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 wellbeing goals and by using the five Ways of Working, as required by the Well-being of Future Generations Act. This will include seeking to maximise the social, economic, environ-mental and cultural benefits, while considering potential impacts when assessing proposals and policies in line with the Act's Sustainable Development Principle"*.

Paragraph 2.9 goes on to clarify that *"The most appropriate way to implement these requirements through the planning system is to adopt a placemaking approach to plan making, planning policy and decision making"*.

PPW defines placemaking as follows: *"Placemaking is a holistic approach to the planning and design of development and spaces, focused on positive outcomes. It draws upon an area's potential to create high quality development and public spaces that promote people's prosperity, health, happiness, and well-being in the widest sense"*.

Section 4.3 'Retail and Commercial Development' indicates *"Retail and commercial centres are hubs of social and economic activity and the focal point for a diverse range of services which support the needs of local communities. They are highly accessible to different modes of transport and are the most sustainable locations for new development."*

Paragraph 4.3.2 highlights the multifunctional role of town centres and states *"Retail and commercial centres should be identified in development plans and include established city, town, district, local, village and neighbourhood centres, which provide a range of shopping, commercial and leisure opportunities as well as places of employment, education, civic identity and social interaction."*

Paragraph 4.3.3 highlights the role local authorities should play in delivering the Welsh Government overarching objectives in respect of retail and commercial centres, stating *"The Welsh Government identifies a number of overarching objectives for retail and commercial centres, which planning authorities should aim to deliver through their development plan and development management decisions ensuring their maximum contribution to the well-being goals."*

Considering the Sequential Test, paragraph 4.3.18 confirms that the Welsh Government operates a 'town centres first' policy in relation to the location of new retail and commercial centre development and that planning authorities should adopted a sequential approach when determining planning applications for retail and other complementary uses. Further, *"By adopting a sequential approach first preference should be to locate new development within a retail and commercial centre defined in the development plan hierarchy of centres."*

PPW highlights the importance of accommodating a mixture of uses within town centres and acknowledges that whilst retail (A1) uses should underpin retail centres, it is only one of the factors which contributes towards vitality. In this respect, paragraph 4.3.33 indicates *"Vibrant and viable centres are distinguished by a diversity of activity and uses which should contribute towards a centre's well-being and success, whilst also reducing the need to travel."* Further, paragraph 4.3.34 states *"Leisure and entertainment, and food and drink uses can benefit retail and commercial centres, and with adequate attention to safeguarding amenities can contribute to a successful evening economy"*

<u>Green Infrastructure</u>

The importance of green infrastructure is highlighted throughout PPW. It is summarised at Paragraph 6.2.11 that *"The quality of the built environment should be enhanced by integrating green infrastructure into development through appropriate site selection and use of creative design. With careful planning and design, informed by an appropriate level of assessment, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places, help to overcome the potential for conflicting objectives, and contribute to health and well-being outcomes"*.

Paragraph 6.2.12 confirms that *"A green infrastructure statement should be submitted with all planning applications. This will be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal. In the case of minor development this will be a short description and should not be an onerous requirement for applicants. The green infrastructure statement will be an effective way of demonstrating positive multi-functional outcomes which are appropriate to the site in question and must be used for demonstrating how the step-wise approach (Paragraph 6.4.15) has been applied"*.

The Step-Wise Approach indicates that the first priority for planning authorities is to avoid damage, if that is not possible then there is a requirement to minimise, mitigate, compensate on site, and then only as a last resort offsite compensation for unavoidable damage must be provided

Technical Advice Notes

In addition to the national policy guidance set out above, Technical Advice Notes (TANs) are land-use planning guidance documents issued by the Welsh Government to provide practical advice and guidance on areas of policy set out in Planning Policy Wales. TANs of relevance to the proposed development include:

- TAN 4: Retail & Commercial Development
- TAN 5: Nature Conservation and Planning
- TAN 11: Noise
- TAN 12: Design

Local Planning Guidance Notes

The following Local Planning Guidance Notes adopted by Wrexham County Borough Council are of relevance to the proposed development:

- Access to and use of buildings
- Parking Standards
- Biodiversity and Development

Appraisal

As stated above, Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise. This section aims to identify the main issues of relevance to the determination of the Planning Application, and assess the scheme against the Development Plan.

The key material planning considerations are as follows:

- Principle of Development
- Sustainability
- Highways and Parking
- Flood Risk
- Ecology, Biodiversity and Green Infrastructure

Principle of Development

As noted in the preceding Planning Policy Context section, the planning policy landscape in Wrexham is complex, primarily due to the withdrawal of the emerging LDP and revision back to the previously adopted UDP 1996 – 2011, which is essentially time expired and in practical terms, creates difficulties when assessing the policy compliance of the scheme. As discussed above, given the age of the UDP, the application site is not situated within the principal shopping street or defined shopping centre, as the adoption of the UDP pre-dates the construction of Eagles Meadow Shopping Centre. However, the Wrexham Town Centre Masterplan indicates that the application site is located within the defined 'Masterplan Area' and therefore occupies a location within the town centre. As the

Masterplan document forms part of the evidence base for the now withdrawn emerging LDP and is utilised as part of a framework for decision making within the defined masterplan area, for the purposes of this appraisal we consider that the site is within the defined town centre (albeit no weight can be attached to contents of the withdrawn LDP, which was informed by the Masterplan). In any case, the assessment of the scheme will be considered against Future Wales – The National Plan 2040 which forms *'the development plan'* and takes legal precedence over the UDP. Where relevant and applicable, the policies of the UDP will also be referenced.

The adopted UDP Proposals Map indicates the application site is located within the defined settlement boundary (as defined by Policy SP1 of the UDP) and is not allocated for a specific land use purpose; therefore representing 'white land', where a range of development may be considered acceptable in principle. It is considered the proposed retro gaming lounge use is highly compatible with the surrounding land uses, which comprise comparable town centre uses, including A1 Retail, A3 Food & Drink and D2 Leisure & Assembly uses.

Policy SP1 seeks to direct development towards the defined settlement limits and it is therefore considered the proposal aligns with the strategic principles of Policy SP1. The supporting text adjoining Policy S2 also states in 8.9 *"while retailing is usually the key factor underpinning the success of a town centre, it is only one of a range of uses which contributes to the overall well-being of the centre."* Policy S3 'non-shopping key town centre uses' indicates the town centre is identified as the preferred location for non-shopping uses, where they are readily accessible to public transport facilities. The application site is located within the town centre and is highly accessible, served by a comprehensive offering of public transport, alongside opportunities for active travel. On this basis the scheme adheres to Policy S3. In summary, we consider the proposals adhere to the policies of the adopted UDP, where relevant.

The location of the proposed development aligns with Policy 1 'Where Wales Will Grow' of Future Wales - The National Plan 2040, which directs development towards the national growth area at Wrexham. Similarly, the proposal aligns with Policy 20 'National Growth Area – Wrexham and Deeside', highlighting the importance of this growth area in the north region as a focus for strategic economic growth. Policy 6 'Town Centre First' indicates that new leisure facilities must be located within town centres and should have good access by public transport. Policy 6 also requires that a sequential approach to be followed in respect of site selection. It is considered the proposal adheres to both of these requirements and benefits from an 'in-centre' location, which is highly accessible and importantly, sequentially preferrable. Future Wales highlights, how the health and vibrancy of town centres is viewed as the starting point for decision making. We believe the proposed development will contribute towards the ongoing health and vibrancy of the town centre, providing a leisure type use within the defined town centre. Additionally, the introduction of a leisure type use in this location will contribute towards the creation of multi-functional places as the role of town centres evolves in light of an evolving retail landscape. Further, Policy 6 confirms that leisure uses are identified as appropriate uses within town centres. On this basis, we consider the scheme aligns with the strategies and policies of Future Wales – The National Plan 2040.

The Wrexham Town Centre Masterplan indicates that future growth in the town centre will come from a greater diversity of town centre uses. The proposed leisure type use will strengthen the diversity of uses within the town centre. Furthermore, the Masterplan highlights the importance of the evening economy, which forms a key objective. The proposal responds to this key objective, providing a leisure type use that will operate beyond the traditional retail hours of an A1 shopping use, creating higher levels of footfall and activity throughout the evening and night time. The proposed development will enable a greater diversity of evening and night time which will contribute towards making the town more attractive to a wider audience, in accordance with the aims of the Masterplan. In summary, it is considered the proposal aligns with the overarching strategy of the Wrexham Town Centre Masterplan.

In light of the above, it is considered the principle of development for the proposed retro gaming lounge has been robustly established and adheres to the adopted UDP, alongside Future Wales – The National Plan 2040 which make up the 'Development Plan'.

Sustainability

Planning Policy Wales Ed. 12 outlines that previously developed, brownfield land should, wherever possible, be used in preference to greenfield sites where it is suitable for development. Previously developed land (brownfield land) is defined as land that *"is or was occupied by a permanent structure (excluding agricultural or forestry buildings) and associated fixed surface infrastructure*". As noted above, the proposal represents a change of use and seeks to utilise an existing unit within a highly centralised location. It is therefore considered that the proposal supports the objectives of PPW in regards to the use of brownfield land.

Further to the sustainability requirements outlined at a national level within PPW Ed. 12, the adopted UDP indicates at Policy S3 'The Broad Location of Development' that *"development should use previously developed brownfield land comprising vacant, derelict or underused land in preference to the use of greenfield land"*.

In addition to the sustainability credentials of the scheme set out above, the site occupies a highly accessible location with excellent linkages to well served public transport routes and opportunities for active travel. Two bus stops are found in the immediate vicinity of the site, at Smithfield Road and Salop Road, providing access to local and regional services/routes. The nearest train station is Wrexham Central, found approximately 750 metres west of the site. The principal train station in the town is Wrexham General, which is located approximately 1.1km north west of the site, providing access to the Transport for Wales services to Cardiff Central, Chester, Holyhead, & Birmingham International.

In terms of active travel, pavements line the outer perimeter of the shopping centre, which is also served by an internal pedestrianised area, creating a traffic free environment. The Wrexham Active Travel Network map indicates that many of the streets in the immediate vicinity of the site are identified as future walking and cycling active travel routes. In light of the above, we consider the proposed development is highly accessible and sustainable, owing to the site location within Wrexham Town Centre, which is well served by public transport and opportunities for active travel. Accordingly, the scheme aligns with the high-level sustainability objectives of PPW Ed. 12, the adopted UDP and Future Wales.

Highways and Parking

The proposed development will utilise the existing access and parking arrangements which serve Eagles Meadow Shopping Centre. The delivery and servicing arrangements will also remain unchanged. We understand the unit receives deliveries via the under-croft servicing area which is accessed from the A525. The car park which serves Eagles Meadow Shopping Centres has capacity for approximately 970 parking spaces. Additionally, a number of surface level public car parks are situated within the town centre. It is therefore considered the unit is comprehensively served by car parking. It is envisaged the transport characteristics of the proposed retro gaming lounge will be highly comparable to the established A1 retail use. Given that the scheme relates wholly to existing floorspace, the intensity of the use in terms of traffic generation will remain broadly consistent. In summary, it is considered the proposed development aligns with Policy PS7 Transport & Policy T8 Parking of the adopted UDP.

Flooding and Drainage

The NRW TAN 15 Flood Map for Planning indicates the subject site is located within Flood Zone 2 in respect of flood risk from rivers and the sea. The site is located within Flood Zone 2 in respect of flood risk from surface water and small watercourse flooding. The application proposes the change of use of existing floorspace and it is confirmed the application does not propose additional new build floorspace. It is imperative to note that the application site is not situated at ground floor level. Under-croft car parking and servicing areas are situated below Eagles Meadow Shopping Centre and the retail terrace occupies an elevated position. The proposed use is

categorised as 'less vulnerable development' and the proposed change to a leisure type use would be also be considered 'less vulnerable development'. Furthermore, the application site represents previously developed, brownfield land situated within an established settlement. The proposal will contribute towards the regeneration of an existing settlement and has been demonstrated within this covering letter to comply with the Development Plan strategy.

As noted within TAN 15, paragraph 6.1 states that discretion should be applied when considering smaller proposals and that requirements for supporting information should be proportionate to the development proposal. In summary, the proposal is modest in size; the land use is categorised as 'less vulnerable development' and is located above ground floor level. The vulnerability of the existing and proposed use remains unchanged. On this basis, we conclude that the proposed development is acceptable in respects of the requirements of TAN 15 and that an FCA is not in this instance necessary.

Ecology, Biodiversity and Green Infrastructure

Given that the proposal comprises a change of use only, with no external alterations, there would be no impacts from a biodiversity perspective, as the site does not contain any habitats. Nevertheless, there is a requirement to produce a proportionate Green Infrastructure Statement.

Green Infrastructure Statement

Paragraph 6.21 of Planning Policy Wales defines green infrastructure as "the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places. Component elements of green infrastructure can function at different scales and some components, such as trees and woodland, are often universally present and function at all levels. At the landscape scale green infrastructure can comprise entire ecosystems such as wetlands, waterways, peatlands and mountain ranges or be connected networks of mosaic habitats, including grasslands. At a local scale, it might comprise parks, fields, ponds, natural green spaces, public rights of way, allotments, cemeteries and gardens or may be designed or managed features such as sustainable drainage systems. At smaller scales, individual urban interventions such as street trees, hedgerows, roadside verges, and green roofs/walls can all contribute to green infrastructure networks.

The Environment (Wales) Act 2016, provides a context for the delivery of multi-functional green infrastructure. Its protection and provision can make a significant contribution to the sustainable management of natural resources, and in particular to protecting, maintaining and enhancing biodiversity and the resilience of ecosystems in terms of the diversity within and connections between ecosystems and the extent and condition of these ecosystems, so that they are better able to resist, recover from and adapt to pressures. This means that the development of green infrastructure is an important way for local authorities to deliver their Section 6 duty under the Environment (Wales) Act 2016.

The quality of the built environment should be enhanced by integrating green infrastructure into development through appropriate site selection and use of creative design. With careful planning and design, informed by an appropriate level of assessment, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places, help to overcome the potential for conflicting objectives, and contribute to health and well-being outcomes.

The DECCA Framework and Net Benefits for Biodiversity: The DECCA framework is used for evaluating ecosystem resilience based on five attributes and properties specified in the Environment (Wales) Act. These are: Diversity, Extent, Condition, Connectivity and Aspects of ecosystem resilience. A summary of the definitions is described below:

- Diversity: maintaining and enhancing diversity at every scale, including genetic, structural, habitat and between-habitat levels. This supports the complexity of ecosystem functions and interactions that deliver services and benefits.
- Extent: incorporating measures which maintain and increase the area of semi-natural habitat/features and linkages between habitats. In general, smaller ecosystems have reduced capacity to adapt, recover or resist disturbance.
- Condition: The condition of an ecosystem is affected by multiple and complex pressures acting both as short term and longer-term types of disturbance. Both direct and wider impacts should be considered, for example avoiding or mitigating pressures such as climate change, pollution, invasive species, land management neglect etc.
- Connectivity: This refers to the links between and within habitats, which may take the form of physical corridors, stepping stones in the landscape, or patches of the same or related vegetation types that together create a network that enables the flow or movement of genes, species and natural resources. Developments should take opportunities to develop functional habitat and ecological networks within and between ecosystems, building on existing connectivity.
- Aspects of ecosystem resilience (adaptability, recovery and resistance): ecosystem resilience is a product of the above four attributes. Adaptability, recovery and resistance to/from a disturbance are defining features of ecosystem resilience.

Paragraph 6.4.11 of Planning Policy Wales states that "planning authorities must follow a step-wise approach to maintain and enhance biodiversity, build resilient ecological networks and deliver net benefits for biodiversity by ensuring that any adverse environmental effects are firstly avoided, then minimized, mitigated, and as a last resort compensated for. Enhancement must be secured by delivering a biodiversity benefit primarily on site or immediately adjacent to the site, over and above that required to mitigate or compensate for any negative impact."

The development would not give rise to any detrimental impact upon green infrastructure, given that no habitats or green features are situated within or in the immediate vicinity of the site. It is considered the shopfront would not be a suitable location to incorporate ecological enhancements measures such as bird or bat boxes. Accordingly, there is no scope to incorporate any biodiversity enhancements within the scheme proposals.

It is considered that this proportional Green Infrastructure Statement which has been undertaken following the Step-Wise approach advocated in Planning Policy Wales has evidenced that the proposed development is respectful of existing green infrastructure assets, and seeks to avoid any impact. In light of the above, it is considered that the proposed development accords with UDP Policy PS11 (Biodiversity) and GDP1 and is therefore acceptable in regards to ecology, biodiversity and green infrastructure.

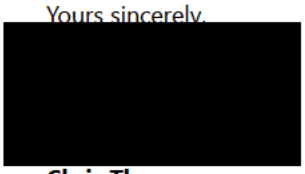
Conclusion

This covering letter has been prepared on behalf of MB Games Ltd in order to support an application for full planning permission at 28 Eagles Meadow Shopping Centre, Wrexham LL13 8DG for the Proposed Change of Use of an Existing Unit (A1) to a Retro Gaming Lounge (Unique Use).

To conclude, we believe the proposals represent a policy compliant scheme when considered against the relevant local and national level planning policies. On this basis we politely request that the application be positively determined, and planning permission be granted without delay.

I trust that the submitted documents allow the application to be validated and look forward to receiving details of the name of the case officer, application reference number and target determination date. If you have any queries in the meantime, please do not hesitate to get in touch.

Yours sincerely,



Chris Thompson
Graduate Planner