

June 2022



**Full Planning Application for the proposed change of use
of Unit 16, Hale Top Civic Centre, Wythenshawe, M22 5RB
from retail unit (E(a) use class) to betting shop (sui generis
use class)**

Planning Statement

On behalf of

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1.0 Introduction and Site Context

- 1.1 This Planning Statement has been prepared on behalf of St Modwen Developments Limited to support a Full Planning Application for the proposed change of use of Unit 16, Hale Top Civic Centre, Wythenshawe, M22 5RB from Retail Shop (E(a) use class) to betting shop (sui generis use class).
- 1.2 The proposal would bring a vacant unit back in to use to the benefit of the vitality and viability of the district centre as designated within the Manchester Local Plan Policies Map which supports economic growth principles in national and local planning policy.

Site Context

- 1.3 The site is within the Wythenshawe District Centre as detailed within the adopted Policies Map. The site sits within Flood Zone 1 of the Environment Agency's Flood Maps for Planning and is at low risk from flooding. The site is not within a conservation area and there are no listed buildings in the immediate locality.
- 1.4 Unit 16 is the ground floor unit within a three storey commercial building located on the northern side of Hale Top developed in the mid-20th Century as part of Wythenshawe Civic Centre. The building is within a parade of commercial units to the ground floor with a mix of uses in the upper floors, predominantly offices. The unit has a lawful Class E Use Class under the Use Classes Order 1987 (as amended). Use Class E was introduced on 1st September 2020 and revokes the former use classes of A1 (shops), A2 (financial and professional including banks), A3 (restaurants and cafes) as well as parts of D1 and D2 and puts them all into one new overarching use class. Any adopted Development Plan policies relating to the former A1-A3 and D1-D2 uses however remain relevant when assessing development proposals.

Property History

- 1.5 The unit has been operated by TUI as a travel agency for a number of years, TUI are not to renew the lease of the unit. An alternative town centre use is now proposed to bring a vacant unit in a prominent High Street location back into active use.

Relevant Planning History

- 1.6 There is no recent planning application history related to 16 Hale Top relevant to this application.

Planning Application Submission

- 1.7 The Application comprises of the following submission documents:
 - Completed Application Forms

- Statutory Application Fee
- Location Plan
- Existing and Proposed Layout
- Planning Statement

2.0 The Proposed Development

- 2.1 The development proposes to change the use of Unit 16 Hale Top from a former Travel Agent - TUI (E(a) use class) to a betting shop (sui generis use class).
- 2.2 As previously detailed, the proposed change of use would prevent the former travel agents being vacant in the long term.
- 2.3 The opening of a Betting Shop in this location will result in additional staff employment and bring a large vacant unit back into use which supports economic growth principles in national and local planning policy.
- 2.4 Full details of the proposed change of use are shown on the submitted floor plans, there are no external alterations proposed and therefore elevations are not submitted within the plans pack.
- 2.5 Licensed betting shops are regarded as being main town centre uses in the National Planning Policy Framework (NPPF) and are seen to maintain the vitality and viability in local town and city centres by complementing the main retail uses and the night-time economy.

3.0 Planning Policy Review

3.1 The Third Edition of the National Planning Policy Framework (NPPF) was published in July 2021 and supersedes the previous 2012, 2018 and 2019 versions of the document. The framework sets out the Government's planning policies for England and how these are expected to be applied. The following policies are considered applicable to the proposed change of use application.

3.2 Paragraph 8 of the NPPF confirms the purpose of the planning system is to contribute to the achievement of sustainable development:

“There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

- **An economic role** – build a strong, responsive and competitive economy,
- **A social role** – creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- **An environmental role** – contributing to protecting and enhancing our natural, built and historic environment

3.3 The proposed development comprises a main town centre use within a district centre. By bringing a vacant unit back into active use, this supports the local economy including job retention, it meets a social role by retaining a betting shop service for residents and also it meets an environmental role by providing an active shop frontage in a prominent position.

3.4 Section 6 of the NPPF provides guidance on supporting economic development. Paragraph 81 confirms that Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

3.5 Section 7 of the NPPF provides guidance on ensuring the vitality of town centres. Paragraph 86 confirms that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation.

The Development Plan

3.6 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires all planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

3.7 The statutory Development Plan for Manchester City Council comprises of the Core Strategy (2012 - 2027), Extant Unitary Development Plan (UDP) policies and a number of Supplementary planning Documents.

3.8 The following policies are applicable to the proposed change of use.

Core Strategy (Adopted July 2012)

3.9 Policy EC1 – Employment and Economic Growth In Manchester is a strategic level policy but also confirms support for the continued social, economic and environmental regeneration of the City.

3.10 Policy EC10 – Wythenshawe confirms a number of locations within Wythenshawe that will be the focus of economic development including ‘the district centre of Wythenshawe’.

3.11 Policy C2 – District Centres supports the provision of a good range of accessible key services, including retail, health facilities, public services, leisure activities and financial and legal services. The Council will also support development which extends the time during which District Centres are active and contribute positively to the diversity and mix of uses within centres without undermining their primary retail function.

3.12 Policy C7 – Wythenshawe District Centres sets out the overarching uses which will be accepted within the designated Wythenshawe Centres. The Council also supports the development of non-food retail and other commercial uses in Wythenshawe, including hotels and uses which maintain vitality beyond normal trading hours.

3.13 Policy C10 – Leisure and the Evening Economy sets out the Council’s support for uses which benefit the night time economy including uses which support both the day-time and evening/night-time economies whilst not undermining the role of the primary shopping area

3.14 Policy DM1 – Development Management is a generic policy which sets out the technical considerations by which the Council judge each application including appropriate layouts, design and impact upon amenity.

Unitary Development Plan (UDP)

3.15 The UDP was broadly replaced upon the adoption of the Core Strategy, a number of Policies are considered extant and still apply.

3.16 Policy S1.2 encourages improvements to a number of designated centres to ensure that they remain the focus for both shopping and a full range of community facilities.

4.0 Planning Assessment

Impact on the Vitality and Viability of the District Centre

- 4.1 Betting shops, as with most high street retailers in the last 2 years, have been severely affected by the Covid Pandemic and enforced government closures of business and retail premises in town centres during national lockdown periods. Having survived the pandemic, businesses must consider their future options to remain viable now and into the future.
- 4.2 As it stands, the vacant unit does not contribute positively to the vitality of the district centre. The proposed change of use would bring a unit back into active use to support the vitality and viability of the town centre and strengthen its offering of shops and services in line with Policies C2, C7 and C10 of the Core Strategy and S1.2 of the UDP.
- 4.3 The proposed change of use provides an appropriate main town centre use as defined by the NPPF and provides a service facility that is complementary to the wider retail function of the town centre. In this regard, we consider that the proposal again would accord with Policies C2, C7 and C10 of the Core Strategy and S1.2 of the UDP as an appropriate use in the defined District Centre.
- 4.4 As set out above, the proposed change of use would result in additional job creation, likely to be taken by local workers a viable use within a prominent unit that would benefit both the day time and the evening economy in balance. It has been shown over time that betting shops create a significant number of linked trips and benefit the wider retail function of the centre in which they are located. This meets the requirements of Policy C10
- 4.5 Furthermore, Policies C2 & C7 in particular support the provision of a wide range of appropriate uses in designated centres, of which betting shops are a defined Town Centre Use. As such, the introduction of an appropriate use in this location would benefit the vitality and viability of the district centre replacing a vacant unit in accordance with the desires of Policies C2 & C7.

Technical Consideration

- 4.6 There would be no external alterations to the building form or shop front itself, as such the design of the proposed unit would be unchanged and acceptable. The requirements of Policy D1 are therefore met in a design sense.
- 4.7 Existing betting shops units have operated for a number of years in Wythenshawe District Centre with no complaints of noise, anti-social behaviour etc. The betting shop use is therefore not expected to have an undue impact upon nearby residents or occupiers.

- 4.8 The proposal will increase footfall and provides an opportunity for linked trips to the wider town centre as well as contributing to the centre's later afternoon / evening economy when traditional retail shops are open 9-5pm.
- 4.9 Overall, the proposed change of use would improve the vitality and viability of this area of the District Centre by occupying a vacant unit whilst meeting the adopted policy aspirations to create a mix of appropriate town centre uses to benefit the day time and night time economy.

5.0 Conclusions

- 5.1 This Planning Statement has been prepared on behalf of St Modwen Developments Limited to support a Full Planning Application for the proposed change of use of Unit 16, Hale Top Civic Centre, Wythenshawe, M22 5RB from Retail Shop (E(a) use class) to betting shop (sui generis use class).
- 5.2 The proposal has a number of significant benefits deriving from it and it should be supported by the Council for the following reasons
- The proposal will provide additional employment and contributes to economic development objectives as set out in the NPPF and the Local Plan;
 - The unit lies within an area designated as a district centre and is considered to be a main town centre use as defined by the NPPF so the principle of the change of use is acceptable, as the impact upon the district centre and supports the wider retail function;
 - The proposal supports the aims of the NPPF and the adopted Local Plan which supports economic growth, job retention and a positive approach to the determination of planning applications;
 - Should planning permission not be granted for a sui generis use, this would result in a vacant unit having no active street frontage which harms the vitality and viability of the district centre. This would be detrimental to the district centre and not in accordance with the NPPF's presumption in favour of sustainable development.
 - The proposal will increase footfall and provides an opportunity for linked trips to the wider centre as well as contributing to the centre's later afternoon / evening economy when traditional retail shops are open 9-5pm..
- 5.3 In view of the above, it is considered the scheme satisfies both national and local policy, in particular Policies C2, C7 and C10 of the Core Strategy and S1.2 of the UDP and represents a suitable use for the Unit. The proposal addresses all the relevant material considerations and, in this respect, we would invite the Council to assess the application and offer its support for the proposals.