

February 2024



**Full Planning Application for the proposed change of use
of Units 17-18 The Willows Shopping Centre, Wickford,
Essex, SS12 0RA from E use class to a betting shop (sui
generis use class)**

Planning Statement

On behalf of

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Appendices

1. Betfred Market Research Findings Report
2. Betfred Brochure
3. Marketing Agent Letter

1.0 Introduction, Site Context, Marketing and Planning History

Introduction

- 1.1 This Planning Statement has been prepared on behalf of Done Brothers (Cash Betting) Ltd to support the proposed change of use of Units 17-18 The Willows Shopping Centre, Wickford, Essex, SS12 0RA from E use class to a betting shop (sui generis use class).
- 1.2 The Unit is a ground floor unit and has been vacant and marketed since February 2023. The most recent planning permission for the unit was for an A1 use (Charity Shop) that now falls under the new E use class in accordance with amendments made to the Town and Country Planning (Use Classes) Order in September 2020.
- 1.3 Betfred already operate a successful Bookmaker business in Wickford at 7/7A Station Avenue, Wickford, SS11 7AS. This is a short distance of 170 metres from the proposed change of use unit at the Willows Shopping Centre. This change of use Application seeks to facilitate a relocation of Betfred's existing bookmaker business from Station Avenue to the Willows Shopping Centre to a different unit that better suits their business floorspace and layout requirements.
- 1.4 Both units are in close proximity in the town centre, the proposed unit is however within the primary shopping frontage.
- 1.5 The proposed change of use would not increase the number of Bookmakers in Wickford town centre, however there would be a loss of a retail unit in the primary shopping frontage.

Marketing History

- 1.6 A letter from the Marketing Agents Green & Partners is submitted at Appendix 3 of this Statement to detail what marketing has been undertaken of the unit.
- 1.7 The letter confirms that the unit has been vacant and actively marketed since February 2023 for a retail or other occupier. The unit has been unable to secure a viable occupier in 12 months, despite efforts made by the landowner and marketing agent to try and attract a retail operator.
- 1.8 An alternative but complementary sui generis main town centre use is now proposed to bring the vacant unit back into active use.
- 1.9 The existing Betfred Unit at 7/7A Station Avenue a distance of 170 metres away from the Application site, will in turn become available to retail occupiers upon Betfred's relocation. There is no loss of a retail unit and no additional Bookmakers proposed in the town centre in this regard.

Planning History

- 1.10 Following a search of the Local Authority's Public Access Webpage there is no evidence of any historic change of use applications relevant to the consideration of this application, the application history is therefore not considered relevant to this proposal.

Site Context

- 1.11 The Willows Shopping Centre lies within the town centre of Wickford. The site is to the north of High Street, adjacent to the train line through Wickford. The centre lies on the western side of High Street and all units within the centre are considered to form the principal frontage which continues south along High Street.
- 1.12 Figure 1 below show the shopfront of the former Sue Ryder Charity Shop as existing:

Figure 1: Shop Front Elevation onto High Street



Planning Application Submission

- 1.13 The Application comprises of the following submission documents:
- Completed Application Forms
 - Location Plan and Existing and Proposed Layout Plan
 - Existing and Proposed Elevations Plan
 - Planning Statement and 3 x Appendices (Betfred Brochure, Market Research Findings Report and Marketing Letter).

2.0 The Proposed Development

- 2.1 The proposed development seeks a change of use of Units 17-18 The Willows Shopping Centre, Wickford, Essex, SS12 0RA from E use class to a betting shop (sui generis use class) alongside a new shop front.
- 2.2 The Unit has been vacant for a significant period of time having been marketed since February 2023.
- 2.3 Betfred already operate a successful Bookmaker business on Station Avenue in Wickford town centre at 7/7a Station Avenue. This is a short distance of 170 metres to the north of the subject change of use unit.
- 2.4 The proposed change of use seeks to facilitate a relocation of Betfred's existing business from Station Avenue to a Unit that better suits their floorspace requirements and business needs in response to local demand.
- 2.5 There would not be any additional bookmakers introduced in Wickford town centre and whilst there would be the loss of a single retail unit in the primary shopping frontage, the out of date local policy encourages complimentary town centre uses. Furthermore, Betfred's current unit at 7/7a Station Approach would become available for occupation by a retail or other commercial operator (subject to any requisite planning permissions).
- 2.6 The relocation of Betfred's Bookmaker business would retain this service and facility in the town centre and bring a long term vacant unit back into active use, strengthening the town centre vitality and viability and continuing to support local employment, economic growth and job creation.
- 2.7 Betfred is the world's biggest privately-owned betting company and one of the UK's biggest privately-owned retail outlets. Licensed betting shops are regarded as being main town centre uses under Annex 2 (Glossary) of the National Planning Policy Framework (NPPF 2023) as they are defined as a leisure and entertainment use. Betting shops as a main town centre use, support the main retail function of town centres nationwide.



3.0 Planning Policy Review

- 3.1 The Sixth Edition of the National Planning Policy Framework (NPPF) was published on the 19th December 2023 and replaces the guidance in the previous 2023, 2021, 2019, 2018 and 2012 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
 - **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 town centre. By bringing a long-term vacant unit back into active use, this supports the local economy including job retention, it meets a social role by retaining a Bookmaker service for residents in Wickford town centre and also it meets an environmental role by providing an active shop frontage to improve the vitality and viability of the town centre and shopping centre.
- 3.4 Section 6 of the NPPF provides guidance on supporting economic development. Paragraph 85 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 90 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 Cornwall comprises of Basildon District Local Plan Saved Policies 2007. Approved by the Secretary of State via a Direction issued on 20 September 2007. Originally, they were part of the Basildon District Local Plan, adopted in March 1998 with Alterations in September 1999, The Saved Policies have

been reviewed against the National Planning Policy Framework (NPPF) published in July 2018 to assess the level of compliance each policy has with the NPPF.

- 3.8 The following Development Plan policies are considered applicable to the proposed change of use.

Basildon District Local Plan Saved Policies 2007

- 3.9 Policy BAS SH4: Town Centre Shopping Frontages states “Changes of Use from Use Class A1 (shops) to Use Class A2 (Financial and Professional Services) or Class A3 (Food and Drink) at ground floor level within the Primary Shopping Frontages will be allowed **provided that material harm to the retail function of the Primary Shopping Frontage or the vitality and viability of the town centre as a whole does not result**”. The supporting text within the Compliance Review of the Saved Policies with the NPPF 2018 document, it is confirmed “some flexibility may be required to allow other suitable uses not specified within the policy to ensure town centres can adapt and grow”.
- 3.10 Policy BAS TC1: District Wide Town Centre Policy confirms within the town centres, as identified on the Proposals Map, development appropriate to a town centre, including retailing, offices, recreational or community facilities and residential (where it forms an ancillary part of a mixed use scheme) will be encouraged.
- 3.11 Policy BAS BE17: Shop Fronts confirms when applications for new shop fronts are submitted, the council will have regard to their scale, design and likely impact on the existing and adjoining premises.

4.0 Planning Assessment

Impact on the Vitality and Viability of the Town Centre

- 4.1 Betfred currently operate a bookmaker business at 7/7a Station Avenue, a short distance of 170 metres from the proposed change of use unit at 17-18 The Willows Shopping Centre.
- 4.2 The proposal seeks a relocation of their existing bookmaker business within the town centre from one unit to another to a unit that is more modern and better suits their floorspace and business need requirements.
- 4.3 Whilst Betfred's existing unit is not within the Primary Shopping Frontage, the proposed change of use unit is within the primary shopping frontage of Wickford as shown on the 1998 Town Centre Inset Map.
- 4.4 Relocation of Betfred's existing business would not result in any additional bookmakers being added to the town centre. Betfred's current unit at 7/7a Station Avenue would become available for a retail occupier upon their relocation so there would be no loss of a retail unit in the town centre as a whole.
- 4.5 A condition of Betfred's licensing is that they are required to relinquish their licensing to operate at their current unit upon relocation so there is no opportunity to run both units as bookmakers.
- 4.6 As it stands, the larger vacant unit in the Willows Shopping Centre does not contribute positively to enhance the town centre or primary shopping frontage. The proposed change of use would bring the unit back into active use with an open shopfront and changing window displays to support and enhance the vitality and viability of the town centre, strengthen its offering of shops and services and make a positive contribution to the built environment in accordance with Policy BAS SH4 and NPPF Para 90.
- 4.7 The unit has been vacant for a significant period of time and marketed since February 2023 as detailed at Appendix 3 of this Statement. Despite works undertaken to try and attract a retail operator, no viable interest or offers have been made to the Agents.
- 4.8 To retain the unit as it is currently is harmful to the vitality and viability of the town centre and primary shopping frontage and would not comply with national and local planning policy on supporting economic growth and Town Centre Regeneration.
- 4.9 The proposal provides a main town centre use as defined by the NPPF as a leisure and entertainment service to complement the main retail function of the town centre and primary shopping frontage.

- 4.10 The proposal accords with Policy BAS SH4 and NPPF Para 90 where it supports the vitality and viability of the town centre. The proposal does not increase the number of betting shops in the town centre and frees up a smaller unit through the relocation which is likely to be more attractive to retail operators and more likely to secure a occupier enhancing the vitality and viability of the centre. Of particular consideration is the supporting text within the Compliance Review of the Saved Policies with the NPPF 2018 document, where it states “some flexibility may be required to allow other suitable uses not specified within the policy to ensure town centres can adapt and grow”.
- 4.11 Overall, the proposed relocation of Betfred’s existing business from Station Avenue to The Willows Shopping Centre would improve the vitality and viability of this part of the town centre by occupying a long term vacant unit without unduly affecting the main retail function within the remainder of the primary shopping frontage. Betfred’s existing unit on Station Avenue would in turn become available to the market and available for occupation by retail operators.
- 4.12 The Applicant’s existing Bookmaker business on Station Avenue has operated for a number of years in Wickford town centre with no known complaints of noise or anti-social behaviour. The betting shop use would be relocated to the change of use unit in the Willows Shopping Centre and is not expected to have any undue impact upon day-to-day amenity or any residential properties nearby.
- 4.13 The principle of the change of use is demonstrably acceptable being policy compliant and would support and enhance the vitality and viability of the town centre and primary shopping frontage and freeing up a likely more attractive unit for retail operators. The proposed change of use can therefore be fully supported.

Design

- 4.14 The proposed shopfront elevation plan demonstrates how the shop would appear from the street frontage painted in the Applicant’s business colours of blue and white. There would not be wholesale changes to the shop front and the overall appearance would be maintained, but the Betfred Colour scheme and changes would provide an active frontage in a prominent location. In this regard, the proposal demonstrates a good standard of design in accordance with NPPF Paragraph 135.

5.0 Conclusions

- 5.1 This Planning Statement has been prepared on behalf of Done Brothers (Cash Betting) Ltd to support the proposed change of use of Units 17-18 The Willows Shopping Centre, Wickford, Essex, SS12 0RA from E use class to a betting shop (sui generis use class).
- 5.2 The unit is on the ground floor and has been unoccupied for a period of time since February 2023 as detailed at Appendix 3 of this Statement despite being actively marketed for a retail or other operator. Efforts have been made to try and secure a retail operator. Despite these efforts, the unit has remained vacant.
- 5.3 Betfred already operate a successful Bookmaker business in Wickford on Station Avenue. This is a short distance of 170 metres to the north of the proposed change of use unit at the Willows Centre. Both units are in the designated town centre.
- 5.4 This change of use Application seeks to facilitate a relocation of Betfred's existing business from Station Avenue to Unit 17-18 The Willows to a different Unit that better suits their business floorspace and layout requirements.
- 5.5 The proposal is policy compliant as detailed in Chapter 4 of this Statement and seeks to preserve and enhance the vitality and viability of the town centre and primary shopping frontage.
- 5.6 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 retain Betfred's existing Bookmaker business in Wickford town centre, retains employment and contributes to economic development objectives as set out in the NPPF and the Local Plan which supports economic growth, job retention and a positive approach to the determination of planning applications;
 - The unit lies within the town centre and primary shopping frontage and the use is considered to be a main town centre use as defined on the Annex 2 Glossary of the NPPF; the principle of the change of use is acceptable given the relocation nature of the proposal, and the viability and vitality of the primary shopping frontage is retained;
 - The proposal would not create any additional number of Bookmakers in the town centre, nor would it result in the loss of a retail unit in the town centre and primary shopping frontage as Betfred's current unit would become available on the market to accommodate a retail operator and is likely to be more desirable;
 - 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 up to 22:00 when traditional retail shops are typically only open 9-5pm. This is further detailed at Appendix 1 of this Statement.

- Marketing evidence submitted with the Application at Appendix 3 demonstrates that despite being actively marketed for a retail use since February 2023, no viable offers have been made and so an alternative complementary sui generis use is now proposed.

5.7 In view of the above, it is considered the proposal satisfies both national and local policy and represents a suitable and sustainable use for the long-term vacant unit.

5.8 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 proposal.

Appendices (submitted as separate documents)

1. Betfred Market Research Findings Report
2. Betfred Brochure
3. Marketing Letter