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Havant Borough Council
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27th June 2012

Our Ref: JCB/1381/117164/1497/J

Dear Sirs,

WATERLOOVILLE - 5 THE BOULEVARD, LONDON ROAD
PLANNING APPLICATION FOR CHANGE OF USE FROM USE CLASS SUI
GENERIS (AMUSEMENT ARCADE) TO USE CLASS A2 (FINANCIAL AND
PROFESSIONAL SERVICES)

We act on behalf of Instant Cash Loan Ltd T/A the Money Shop Pawnbroker "TMS" and are instructed as town planning consultants to act as agents for the submission of the above planning application.

We attach 4 copies of the following documentation, which comprises the planning application:

- i) 4 copies of the relevant planning application forms, signed and dated;
- ii) 4 copies of the relevant ownership certificate (B) and Article 7 Certificate, signed and dated;
- iii) 4 copies of a site location plan at a scale of 1:1250;
- iv) The relevant planning application fee by way of a cheque for £335.00 made payable to Havant Borough Council.

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In addition we request that the Council also take into account the contents of this letter as a material consideration in their determination of this application.

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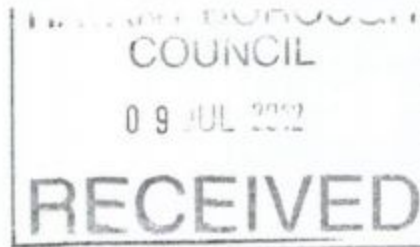


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The Site and Planning History

The application site currently comprises a vacant Amusement Arcade which has been vacant for circa 3 years and has been marketed throughout this time by Myddelton and Major Estate Agents. An amusement arcade is classed as Sui Generis within the Use Classes Order.

The unit has remained vacant for a prolonged period of time and in combination with others it is likely to impinge upon the vitality and viability of the Primary Shopping Frontage. In this case, the Money Shop will re-introduce an active frontage in this location reinvigorating the vitality and viability of the area.

The unit is within the Protected Shopping Frontage of The Boulevard Precinct which is located on London Road and which comprises predominantly retail uses (Use Class A1) together with other financial and professional services (Use Class A2) located in close proximity.

Planning permission was granted in May 1998 for the change of use of the ground floor to an adult amusement centre.

The Proposal

This application seeks planning permission for the change of use of the ground floor at 5 The Boulevard Precinct, London Road from Use Class Sui Generis to Use Class A2 (financial and professional services).

The sales floor area of the property is approximately 50 square metres and it is proposed that all of this floorspace will operate as financial and professional services.

The nature of the proposed use will operate much like a retail unit (Use Class A1) generating a comparable amount of footfall at similar times of the day and it will also maintain a shop frontage.

It is considered that off street parking provision will not be required for the proposed change of use from retail to financial services owing to the site's town centre location with good public transport links and public car parks located within the immediate vicinity.

At this stage it is not proposed that any advertising will be displayed at the property.

The Money Shop Pawnbroker Operation

In an average month TMS registers approximately 10,000 new customers for cheque cashing services and has a similar number of new customers per month for money transfer and foreign currency exchange (based on statistics



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for stores in England). In addition, 5,000 new customers per month are registered for the 'cash till payday' product.

Daily transactions anticipated within the new unit are expected to average 100, with Fridays being the busiest day with up to 250 transactions expected and the last Friday of the month may result in over 300. For any one-month, TMS accommodates approximately 15,000 – 180,000 per year cheque transactions (figures provided by Instant Cash loans Ltd). These figures demonstrate that the public, as part of their shopping trip, frequently visit TMS, therefore generating high levels of pedestrian activity.

There are currently 469 fully-fledged 'Money Shops' - 37 stores in Scotland, 28 stores in Northern Ireland, and 412 Stores in England and Wales. A further 200+ stores expected within the next 5 years. This market penetration within other town and cities demonstrates that it is an accepted integral town centre use, operating as a prosperous and thriving business, attracting many customers.

Planning Policy

The following section sets out relevant planning policy and guidance in the form of the National Planning Policy Framework, as well as local planning policies which are contained in the LDF Core Strategy DPD adopted in March 2011, the LDF Proposals Map, and saved policies from the Havant Borough Local Plan.

National Planning Policy:

National planning policy guidance in respect of the type of development proposed is primarily contained in the National Planning Policy Framework (NPPF).

NPPF sets out the Government's overarching objectives for the delivery of sustainable development through the planning system, namely that planning should contribute to building a strong, responsive and competitive economy; support strong, vibrant and healthy communities; and should contribute to protecting and enhancing our natural, built and historic environment.

Section 2 of the NPPF also sets out the Governments key objectives for town centres in that planning should be positive, promote competitive Town Centre environments and set out policies for the management and growth of centres. In brief it states that planning should promote their vitality and viability by planning for the growth and development of existing centres; promoting and enhancing existing centres, by focusing development in such centres and encouraging a wide range of services in a good environment, accessible to all.

In particular, it seeks to promote competitive Town Centres that provide customer choice and a diverse retail offer and which reflects the individuality of Town Centres. It also states that where Town Centres are in decline, Local



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Planning Authorities should plan positively for their future to encourage economic activity.

Section 4 of NPPF relates to transport and sets out the Government's general principles in respect of the integration of land use planning and transport. Specifically it states that planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education, and other activities.

Havant Core Strategy:

The Havant Borough Core Strategy, which was adopted in March 2011 is the principal document in the council's Local Development Framework. Work is currently being undertaken on other documents in the LDF. Therefore in the transitional period from the Local Plan to the fully completed LDF there are also some relevant policies from the Havant Borough district local plan that have been saved.

The Core strategy identifies that the property is within the Primary Shopping Frontage for Waterlooville.

Saved Policy TC6 of the Havant Borough District Local Plan states that: 'planning applications for Class A2, A3, A4, A5 and other service sector uses, including leisure and entertainment uses, will be permitted in the primary shopping frontages shown on the Proposals Map provided:

- (i) this would not lead to the concentration of, or creation of, adjacent non-retail uses at ground floor level such that this would begin to undermine the retail function of the primary shopping frontages; and
- (ii) the premises will be open to visiting members of the public.'

The proposed change of use is not from a retail unit to a non-retail unit, it is between two non-retail units and therefore Policy TC6, which would normally apply to changes of use in Primary Shopping Frontages from A1 to other uses, does not apply in this case.

Planning Issues

As stated above, the proposed change of use is not from a retail unit to a non-retail unit, it is between two non-retail units. Therefore, the proposed change of use will not alter the number of non-retail uses in the Primary Shopping Frontage and, if anything, the change to A2 use will enhance and improve the vitality and viability of the Primary Shopping Frontage.

Furthermore, an A2 use is a more appropriate use for the Primary Shopping Frontage than an amusement arcade. Generally Sui Generis uses are normally only acceptable in areas without protective frontage policy control.

The change of use is compliant with the requirements of Policy TC6 in terms of concentration of, or creation of, adjacent non-retail uses at ground floor level,



as it is situated in between A1 units (Co-op Travel at 3 The Boulevard Precinct and Cooks Baker at 7 The Boulevard Precinct).

The supporting text with policy TC6 of the local plan states a 60% baseline target for class A1 retail representation in the Primary Shopping Frontage. Within the whole Primary Shopping Frontage A1 use is at 74%, A2 uses is at only 5% and vacancy rate is still relatively high at 11%. Whilst this application does not alter the percentage of A1 use as the property is classed sui generis we believe that these statistics further strengthen the case for change of use of this property to A2.

Additionally, the proposed change of use will provide a beneficial reuse of a longstanding vacant property which has been vacant for in excess of 3 years and has been marketed continuously without success. TMS have agreed terms with the landlord for a 10 year lease which demonstrates TMS' long term commitment to the property. If TMS do not take the lease of this property, it will continue to be vacant, and therefore, occupation by TMS is imperative to prevent the property contributing further to a dead frontage and the resultant continued detrimental effect this will have to the Primary Shopping Frontage. In this case, the Money Shop will re-introduce an active frontage in this location reinvigorating the vitality and viability of the frontage as a whole.

We believe that the occupation by TMS will not have a detrimental effect on the Primary Shopping Frontage and will only contribute to the attractiveness of the frontage because the proposal would provide a service that complements the shopping function of the frontage and aids linked shopping trips, which conforms to the NPPF.

In addition, TMS deal in financial products and the use falls within Class A2. Nevertheless, the use has all the characteristics of a shop including being open to the general public, having a frontage display/active shop window display; a primarily day time use; and selling a variety of financial products.

For information, the specific products and services on offer include:

- Cheque cashing facilities;
- Foreign currency exchange;
- Money transfer;
- Cash loans (the 'cash till pay day' scheme);
- Sale of and services related to pay as you go visa cards (the 'titanium card' scheme);
- Pawnbroking;
- Gold purchase; and
- Jewellery sales.

As a result of the products and services sold TMS is integral to the functioning of both the modern high street and Town and City Centres. It offers key services to shoppers which in turn benefits other retail facilities within the centre and in larger cities provides important facilities for foreign visitors thereby contributing to both retail and tourism sectors.



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The proposed use will provide a service involving visits to the premises by members of the public. The customer footfall visiting TMS will be comparable to that of an A1 shop use and most customers will visit the property during normal shopping hours. Therefore, the proposed use will not incur a noticeable change at the property and will maintain the vitality and viability of the Primary Shopping Frontage.

The proposal would provide a service that complements the shopping function of the area. TMS will directly relate to the retail function of the centre because it provides a financial service to shoppers facilitating the exchange of cheques for cash, loans, money transfer and foreign currency exchange.

The proposal will not have an adverse impact on residential amenity. TMS will not differ perceptively from the existing use and operates during typical retail hours, causing no disturbance, noise, smell or litter that might harm the amenity of adjoining properties.

Indeed, a window display is an important part of the marketing of TMS services. As such, this application proposal will not have an unacceptable impact on the character of the shopping street and will not result in the emergence of blank or dead frontages.

No off street car parking is proposed due to the site's town centre location with good public transport links and public car parks located within the immediate vicinity. Therefore, on the basis of the quantum of floorspace proposed and the location, we do not consider that there will be any material increase in traffic in the vicinity of the site and therefore no risk to pedestrian safety, or indeed increase in demand for car parking. Full provision will be made for quality disabled access to the premises itself.

Specifically, the proposal is therefore, by virtue of the nature of the use as described above, wholly appropriate to the Primary Shopping Frontage and will have no adverse impact in terms of traffic, car parking or amenity of the occupiers of neighbouring properties. Fundamentally by encouraging economic activity and by providing customer choice and a diverse retail offering this application meets the objectives of section 2 of the NPPF and enables the vitality and viability of the town centre.

Therefore, the proposed change of use from Sui Generis to A2 (financial and professional services) will concur with the National Planning Policy Framework and the Havant Borough Core Strategy through contributing to the vibrancy and attractiveness of the shopping frontage and indeed the centre as a whole. As such, due to the characteristics of TMS operation the proposal will have a beneficial effect on vitality and viability when compared against the previous use. Indeed, the proposed change of use will have a positive impact on the Primary Shopping Frontage as an A2 use is a more acceptable shopping centre use than the previous Sui Generis use.



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Conclusion

In conclusion, the proposal will assist in securing an occupier for this vacant unit and thereby its beneficial reuse. It will not adversely impact on the level of shopping provision or the character of the shopping area and most significantly, it will not cause any demonstrable harm to the vitality and viability of the Primary Shopping Frontage.

Due to the nature of the Money Shop Pawnbroker operation, the amenity of adjoining properties will not be harmed and TMS will provide an attractive display window and entrance that will be compatible with adjoining shop units.

In addition, the proposed change of use from Sui Generis to A2 will have no effect on the number of A1 uses in this Primary Shopping Frontage. A Class A2 occupier at this location will positively contribute to the shopping function of the centre and the vitality and viability of the centre will be maintained. The number of A1 retailers within the Primary Shopping Frontage will remain the same as before the change of use, thus not affecting the overall vitality and viability of The Primary Shopping Frontage or the Town Centre as a whole.

Furthermore, the proposed use would generate a similar number of customers to a shop use and most customers would visit the premises during normal shopping hours. Therefore, the proposed use will not suffer an obvious change at the property and will preserve the vitality and viability of the Primary Shopping Frontage.

We look forward to receiving notice of the registration of the planning application marked for my attention and please do not hesitate to contact me on 0115 934 3948, if you wish to discuss any aspect of this application.

Yours sincerely

