

Sequential Test

Land North of Bryn Lane, Wrexham Industrial Estate

CBRE Limited
On Behalf of Net World Sports

December 2023

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1.0 Introduction

- 1.1 This Sequential Test report has been prepared by CBRE Limited on behalf of Net World Sports ('the Applicant') in support of a hybrid planning application for a proposed development known as 'Utopia City' on Land North of Bryn Lane, Wrexham Industrial Estate (ref. P/2023/0497).
- 1.2 The proposals include a range of uses, including Use Classes B1(c), B2, B8, A1, A3, C1 and Sui Generis floorspace including ancillary office space (Use Class B1a), access, servicing, parking and landscaping.
- 1.3 The description of the proposed development is as follows:

Hybrid application seeking: Full planning permission for demolition of existing buildings and the severable and phased erection of Class B1c/B2/B8 development with ancillary Class B1a floorspace and associated infrastructure (including substation and access); and Outline planning permission for the severable and phased construction of Class B1c/B2/B8 development with ancillary Class B1a floorspace; retail, drive-thru, hotel, petrol station (Classes A1/A3/C1/sui generis); and associated infrastructure (all matters reserved).
- 1.4 The application site comprises agricultural land to the north of Bryn Lane, Wrexham Industrial Estate (the 'Site'), as shown on the location plan below.

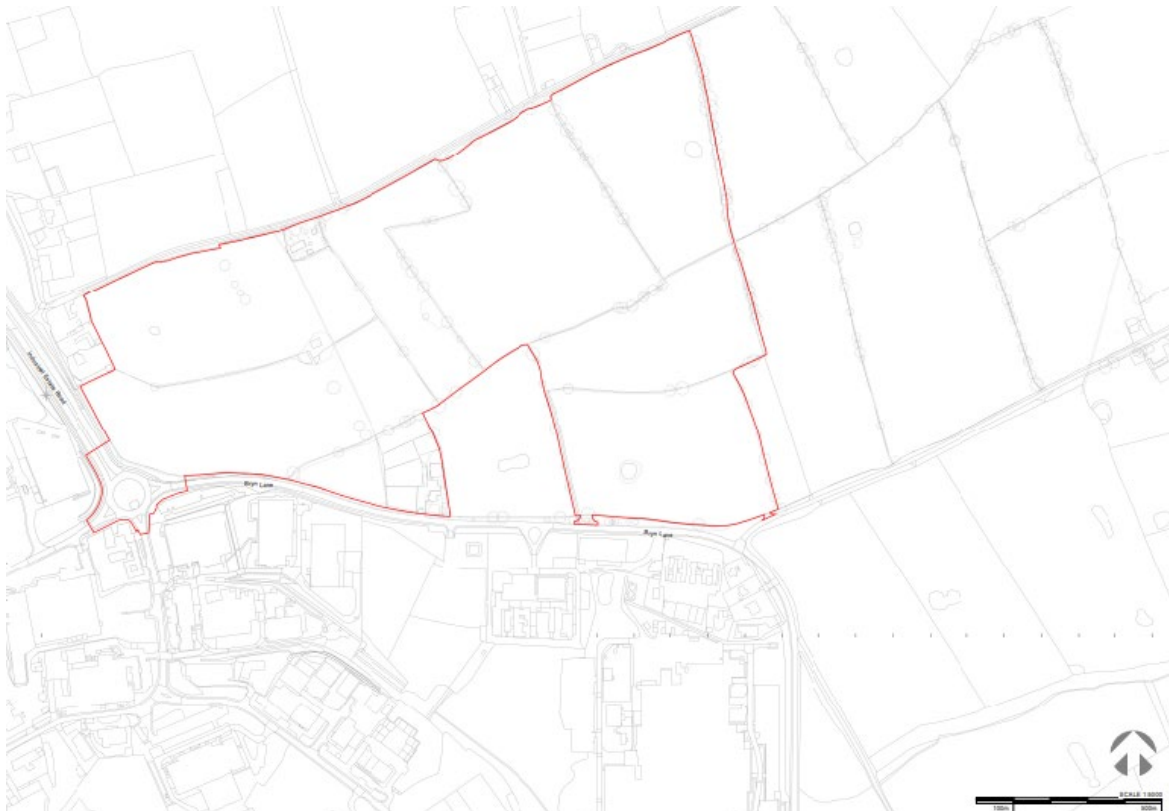


Figure 1: Site Location, Source: SGP Architects

- 1.5 The Site is not allocated for a specific use in the statutory development plan (Wrexham Unitary Development Plan, 2005) and is located outside of the Wrexham Industrial Estate Settlement Limit on Wrexham County Borough Council's (WCBC), adopted proposals map. The site is out of centre in retail sequential terms.
- 1.6 However, the Site is identified as a Key Strategic Site in the draft Local Development Plan (LDP) under draft Policy SP11 'KSS3: Land to the north of Bryn Lane, Wrexham Industrial Estate' for 28ha of Use Class B employment uses.
- 1.7 The LDP has been found sound by an Inspector following examination; however, at an Extraordinary meeting on 19th April 2023, and at a further meeting on the 14th June 2023, the Council voted against the adoption of the LDP. As the LDP has been through examination and been endorsed by a Planning Inspector, this still forms a significant material consideration in the determination of this planning application.
- 1.8 It should be noted that during the two meetings and subsequent votes regarding whether or not to adopt the LDP, the application site or the proposed allocation of the site in the LDP were not a point of discussion or reason for voting against the adoption of the LDP.
- 1.9 The Planning Statement addresses the need for the development and the socio-economic benefits of the scheme in detail.
- 1.10 Following submission of the application, the Case Officer has requested a sequential test in line with the requirements of paragraph 4.3.18 of Planning Policy Wales (PPW) (Ed. 11, 2021).
- 1.11 This report is structured as follows:
 - **Section 2: Planning Policy** – provides an overview of the planning policy requirements for the sequential test;
 - **Section 3: Scope of the Sequential Test** – details the non-employment uses proposed and establishes which uses are to be considered in the sequential test;
 - **Section 4: Sequential Test** – details the findings of the sequential test; and
 - **Section 5: Conclusions** - details the main conclusions of this report.

2.0 Planning Policy

- 2.1 This chapter summarises relevant planning policy relating to the sequential test requirement. The statutory development plan for WCBC currently comprises the Wrexham Unitary Development Plan (UDP) (adopted 2005), which covers the plan period 1996 to 2011. It is important to note that this plan period ended 12 years ago and therefore there are saved policies which are out of date and inconsistent with national policy.
- 2.2 As detailed in Section 1.0 of this report, the emerging Wrexham Local Development Plan is to be given significant weight in the decision-making process.
- 2.3 Other material considerations include Planning Policy Wales (PPW) and Technical Advice Note 4 (2016).

Planning Policy Wales (2021)

- 2.4 Planning Policy Wales (PPW), published in February 2021, sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars, and policy clarification letters which together with PPW provide the national planning policy framework for Wales.
- 2.5 The Welsh Government states that the primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental, and cultural well-being of Wales (paragraph 1.2). There is a presumption in favour of sustainable development in accordance with the development plan, unless material considerations indicate otherwise (paragraph 1.18).

Active and Social Places

- 2.6 Planning authorities need to ensure that residents of existing and new communities have access to jobs and an appropriate range of community facilities including recreation, leisure, health and education (paragraph 4.0.2).
- 2.7 New development should be located and designed in a way which minimises the need to travel, reduces dependency on the private car and enables sustainable access to employment, local services, and community facilities.
- 2.8 In determining planning applications, planning authorities must ensure development proposals, through their design and supporting infrastructure, prioritise provision for access and movement by walking and cycling and, in doing so, maximise their contribution to the objectives of the Active Travel Act (2013) (paragraph 4.1.34).
- 2.9 Section 4.3 *Retail and Commercial Development* sets out that retail and commercial centres are hubs of social and economic activity, and the focal point for a diverse range of services. They are highly accessible to different modes of transport and are the most sustainable locations for new development.
- 2.10 In regards to the sequential test, PPW sets out that the Welsh Government operates a ‘town centres first’ policy in relation to the location of new retail and commercial centre development, and in implementing this policy, local authorities should adopt a sequential approach to the selection of new sites in their development plan and when determining planning applications for retail and other complementary uses (paragraph 4.3.18).

- 2.11 If a suitable site or building to meet identified need is not available within a retail and commercial centre or centres, then consideration should be given to edge of centre sites and if no such sites are suitable or available, only then should out of centre sites in locations that are accessible by a choice of travel modes, including active travel and public transport, be considered. Developers should demonstrate that all potential retail and commercial centre options, and then edge-of-centre options, have been thoroughly assessed using the sequential approach before out of centre sites are considered (paragraph 4.3.19).
- 2.12 Paragraph 4.3.20 sets out that the sequential approach applies to retail and ‘all other uses complementary to retail and commercial centres’, including:
- Financial and professional services (Use Class A2);
 - Food and drink (Use Class A3);
 - Offices (Use Class B1);
 - Hotels (Use Class C1);
 - Educational and other non-residential establishments (Use Class D1);
 - Leisure (Use Class D2); and
 - Certain other uses such as laundrettes and theatres.
- 2.13 Planning authorities should be flexible in their approach where it is necessary. The nature of a proposed use is likely to determine what type of centre (i.e. higher or lower order centre) is most appropriate as a starting point for the sequential approach process.

Productive and Enterprising Places

- 2.14 Wherever possible, planning authorities should encourage and support developments which generate economic prosperity and regeneration (paragraph 5.4.4). Development should be co-ordinated with all forms of infrastructure provision such as transport and utilities (paragraph 5.4.13).
- 2.15 Economic clustering typically occurs when businesses from the same or similar industry, or with a common interest, choose to locate in close proximity for mutual benefit. Businesses can benefit from shared facilities, infrastructure, local pools of skilled and qualified labour, common supply chains, and links to higher education (paragraph 5.4.16). Planning authorities should seek to support the development of business networks and clusters (paragraph 5.4.17).

Technical Advice Note 4 Retail and Commercial Development (2016)

- 2.16 Technical Advice Note (TAN) 4 *Retail and Commercial Development* provides guidance on the role of land use planning in retail and commercial development.
- 2.17 Section 7 sets out the requirements of the sequential test, which supports the Welsh Government’s policy objective of promoting centres identified in the retail and commercial centre hierarchy as the most sustainable locations to live, shop, socialise and conduct business.
- 2.18 Planning applications for retail, leisure and other complementary uses should be subject to the sequential test. The sequential location of development plan allocations or planning applications should be considered in the following order:

- Firstly, within retail and commercial centres identified in the retail hierarchy where suitable sites, or buildings for conversion are available. Where this relates to a development plan allocation, they must be available for development within the plan period. Local planning authorities should ensure that any development plan allocation or planning application is of an appropriate scale in relation to the role and function of the centre.
- If no suitable sites are available in retail and commercial centres then edge-of-centre locations should be considered, with preference given to brownfield sites that are or will be well connected to the existing centre and accessible by a variety of means of transport, particularly walking, cycling and public transport.
- Only when retail and commercial centres and edge of centre locations have been considered and found to be unsuitable can out of centre options within, and then outside, a settlement area be considered. Where out of centre sites are concerned preference should be given to brownfield sites which are or will be well served by a choice of means of transport and are close to an established retail and commercial centre.

2.19 In terms of suitability, TAN 4 sets out that suitability refers to a site's attributes and whether these are sufficient to meet the development requirements of a proposal. Paragraph 7.2 states:

"Where a developer favours a development site on the edge of or outside a retail and commercial centre the developers will need to provide evidence to explain why potential sites or buildings within the centre are unable to accommodate the format, scale and design of a proposed development."

Unitary Development Plan (2005)

- 2.20 The Unitary Development Plan (UDP) (2005) covers the plan period 1996-2011 and provides a framework for local decision making. The plan is divided into two parts: Part 1 outlines the Council's broad intention for development and provides a framework for more specific policies and proposals; Part 2 constitutes the Council's specific policies and provides detailed guidance for development.
- 2.21 Policy S2 states that outside of 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.
- 2.22 Policy S3 sets out that only where there is a clearly defined need 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.

Emerging Wrexham Local Development Plan 2013-2028

- 2.23 The application site is identified in the emerging LDP as a Key Strategic Site under draft Policy SP11 'KSS3: Land to the north of Bryn Lane, Wrexham Industrial Estate' for 28ha of Use Class B employment uses.
- 2.24 Draft Policy EM2 *Provision of Supporting Facilities for Employees in Business, Industrial and Warehousing Developments* sets out that provision for open space, public realm, leisure, food and drink, and child-care facilities will be appropriate in the employment areas shown on the proposals map, provided:
- i. the facility is of an appropriate size and scale and is subordinate in its nature to meet the needs of workers in the vicinity and does not result in an over concentration of such facilities in one area,
 - ii. the proposal does not impact on the status and character of the employment area for B1, B2 or B8 uses,

- iii. the operations of other industrial and employment uses in the vicinity of the site would not be adversely affected, and
 - iv. the proposal would not result in significant levels of visitor traffic into the area or exacerbate existing traffic conditions.
- 2.25 In the justifying text the Council highlight that the absence of such facilities in an employment area can increase travel demand and make the areas less attractive to employers and employees. Where new employment areas are proposed, the need for such facilities should be considered as part of the overall development scheme. In all cases, only facilities of an appropriate nature and scale to meet the needs of employees will be permitted.
- 2.26 Policy R1 *Retail, Leisure and Commercial Centre Hierarchy* of the emerging LDP sets out the centre hierarchy for proposals:
 - Wrexham Town Centre,
 - The District Centres of Cefn Mawr and Gwersyllt,
 - The Local Centres of Borrass, Chirk, Coedpoeth, Gresford, Llay, Penybryn and Rhosllanerchrugog,
 - The Village Centres of Brynteg, Holt, Ruabon and Rossett, and
 - The Neighbourhood Centres of Churchill Drive, Garden Village and Park Avenue, Wrexham.
- 2.27 Draft Policy R6 *Retail, Leisure and Commercial Development (Edge and Out of Centre)* states that proposals in such locations will need to demonstrate compliance with the National Planning Policy sequential test; the preference is first to locate new development within a retail, leisure and commercial centre. Where proposals demonstrate there are no suitable available sites or premises within these centres, then edge of centre sites can be considered and if no such sites are suitable or available only then should out of centre sites be considered.
- 2.28 Policy R6 also states that retail development will only be permitted outside designated centres if:
 - There is a need for the proposed floorspace; and
 - That the need cannot be satisfactorily accommodated in existing centres; and
 - The proposal would not cause unacceptable harm to the vitality, attractiveness or viability of an existing centre; and
 - The site is accessible by a choice of means of transport.
- 2.29 The supporting policy text states that Retail Impact Assessments will be required for developments of 2,500 sq m or more.

3.0 Scope of the Sequential Test

Non-employment uses

- 3.1 The proposals include a range of uses, including Use Classes B1(c), B2, B8, A1, A3, C1 and Sui Generis (petrol filling station) floorspace including ancillary office space (Use Class B1a), access, servicing, parking and landscaping.
- 3.2 The application is hybrid in nature, with employment uses and associated infrastructure applied for in the detailed element and a mix of employment, retail, food and drink (drive-thru), hotel and petrol filling station uses applied for in the outline element of the application site. The overall quantum of Use Class A1, A3, C1 and/or Sui Generis use floorspace would not exceed 16,150 sq m Gross External Area (GEA).
- 3.3 To provide more certainty regarding the nature of this non-employment floorspace, the Applicant is willing to accept a planning condition which would limit the amount of retail floorspace (Use Class A1) specifically, to not exceed 2,450 sq m across the application site. Therefore, within the 16,150 sq m of non-employment use floorspace proposed, no more than 2,450 sq m would be retail (Use Class A1) floorspace.

The Retail Tests

Justification & Need

- 3.4 As set out in Section 2.0 of this report, PPW requires a town centre first approach for retail and 'all other uses complementary to retail and commercial centres' (paragraph 4.3.18).
- 3.5 The application site does not benefit from a land use allocation which includes Use Classes A1, A3 or C1 in the adopted or emerging development plan, and is outside of a defined centre.
- 3.6 Emerging Policy R6 *Retail Development (Edge and Out of Centre)* requires that applications for retail development should be able to demonstrate that there is a need for the proposed floorspace and that this need cannot be satisfactorily accommodated in centre.
- 3.7 However, in the emerging LDP draft Policy EM2 *Provision of Supporting Facilities for Employees in Business, Industrial and Warehousing Developments* provision for open space, public realm, leisure, food and drink, and child-care facilities will be appropriate in the employment areas shown on the proposals map subject to the facility being an appropriate size and scale and subordinate in nature to the employment use of the area.
- 3.8 The proposed drive-thru food & drink uses at the application site meet the policy tests set out in draft Policy EM2 and therefore the proposed food and drink uses are considered to be acceptable.

Employment Land Supply

- 3.9 The 16,150 sq m of proposed non-employment uses is a maximum and if not delivered for non-employment uses (Use Classes A1/A3/C1/Sui Generis) this floorspace would be developed for traditional B1c/B2/B8 uses. This approach is described in more detail in the Environmental Statement (Volume 2, Chapter 4 and Chapter 8).
- 3.10 Draft Policy SP9 of the LDP *Economic Growth, Employment and Enterprise* sets out that WCBC will ensure an overall provision of employment land within the Borough of 96.73ha. The KSS3 allocation is for 28ha; however whilst there is an amount of non-B1, B2 and B8 use proposed (16,150 sq m GEA), this is ancillary to the

proposed total floorspace for the site (124,914 sq m GEA) and therefore still aligns with criteria ii of policy EM2, in terms of ensuring the ancillary uses do not impact the status and character of the employment area.

- 3.11 It is also pertinent to consider that Matters Arising Change (MAC) 20 removed 16.82ha of employment land from the LDP as, at the time of the Matters Arising consultation, the land at Kingmoor Park still had permission for a power station that could have been implemented. However, the consent has now expired and there is a pending application (Ref: P/2023/0280) for employment development of use class B8. The site area is 25.4ha which includes land for ecological mitigation. The approval of this application would increase the overall employment floorspace at the Industrial Estate by 93,019sqm which is the floorspace area proposed across the three units. The proposed uses which are not B1, B2 and B8 use on the proposed site at Land to the North of Bryn Lane total 16,150 sq m; therefore the A1, A3, C1 and sui generis uses proposed would not harm the character of the employment area or the overall employment land supply because there would be no net loss of employment land given the additional floorspace proposed at Kingmoor Park.
- 3.12 Whilst this demonstrates that there is no overall loss in employment land (subject to both applications being approved), even if the Kingmoor Park proposal is not approved, the Applicant considers that the proposed development at Land to the North of Bryn Lane remains acceptable in accordance with Policy SP9 and Policy EM2 of the LDP. Both applications should be determined on their own merits.

Need

- 3.13 The proposed ancillary uses at the application site, including the hotel, have been identified by the Applicant as those necessary to serve the existing and future extension to Wrexham Industrial Estate. The current estate employs thousands of people; however it lacks facilities to meet the needs of employees and visitors.
- 3.14 The location of the proposed hotel as part of the wider scheme is a key benefit as the development will help to strengthen the offer to those visiting Wrexham Industrial Estate, and in particular the users of the lorry park. The provision of retail uses, including drive-thrus, also strengthens the offer as it provides additional services which are currently lacking in the industrial estate.
- 3.15 Wrexham Industrial Estate is the UK's second largest industrial estate, extending to over 550ha and is recognised as a regionally and nationally important employment area. The Industrial Estate is home to over 340 businesses and employs over 10,000 people¹.
- 3.16 Despite its size and status, the Industrial Estate lacks a hotel offer as well as other amenities that employees would traditionally seek on an industrial estate of this size. There are no hotels located within the existing Industrial Estate boundary. The nearest hotel is Holt Lodge, which is 2.7km to the north of Wrexham Industrial Estate. This is not considered to be a sustainable approach to servicing the needs of visitors to Wrexham Industrial Estate as it provides limited choice and does not support sustainable travel options between hotel and Industrial Estate for the duration of the visitors' stay.
- 3.17 In terms of retail and food & drink uses, there is a small Nisa local store and Greggs unit in the south of the Industrial Estate; however, given the size of the Industrial Estate and number of associated employees there is a need for additional services/facilities, especially in the northern half of the Industrial Estate. Provision of such facilities at the application site would establish facilities within easy walking distance of businesses located in the north of the Industrial Estate.
- 3.18 Trafford Park is the largest industrial estate in the United Kingdom, with Wrexham Industrial Estate the second largest. Trafford Park Industrial Estate includes a number of hotels and amenities, such as retail outlets and food and drink outlets which have not diluted the employment nature of the area, thus

¹ <https://wrexham-industrial.com/>

demonstrating that these uses can be features of a successful industrial estate and therefore should be considered appropriate in Wrexham. Slough Trading Estate is a further example which also includes a hotel alongside other ancillary uses, such as a gym and food and drink outlets and this is a successful industrial estate which shows that the ancillary uses can support the main purpose of the area.

- 3.19 A further key consideration is that the proposed development at Land north of Bryn Lane includes a HGV parking area, in order to address known problems on the Industrial Estate relating to informal parking of HGVs in the local area, which causes amenity issues for local occupiers and residents. The inclusion of the HGV parking area will enable drivers and those in the logistics sector to park vehicles in a safe area and then access the hotel, if necessary. Alternative sites within Wrexham Town Centre, District Centres, Local Centres, Village Centres or Neighbourhood Centres would not be appropriate as this would increase the number of HGVs within these areas which would have potentially significant adverse impacts in terms of highways, noise, air quality and visual amenity. It therefore follows that the hotel and lorry park need to be located within close proximity to one another in order to address existing issues at the Industrial Estate, which would not be possible if the hotel is not within the Industrial Estate.
- 3.20 The location of a hotel, retail units and food and drink outlets within the Industrial Estate would assist in reducing journey distances and thus promoting sustainable forms of travel. The hotel could also provide conference facilities or meeting rooms to support existing and future businesses. This supports PPW's policy aims regarding Active and Social Spaces and Productive and Enterprising Places, particularly in relation to promoting economic clustering.

Impact

- 3.21 As stated earlier in this Section, the Applicant is willing to accept a planning condition to limit the retail floorspace to 2,450 sq m for Use Class A1 purposes across the site.
- 3.22 As such, in accordance with PPW (para. 4.3.26) and the supporting policy text to LDP Policy R6, a Retail Impact Assessment is not required.

Sequential Test

- 3.23 A sequential test has been carried out, as documented in this report. Of note, there is no policy requirement to undertake a sequential test for a petrol filling station as this is a Sui Generis use rather than retail or 'other complementary uses', as defined by paragraph 4.3.21 of PPW, which would warrant a sequential test.
- 3.24 A sequential test for proposed Sui Generis uses is therefore not considered to be necessary or justified. The purpose of this report is therefore to set out the sequential test which has been undertaken for the Use Class A1 (retail), A3 (food and drink) and C1 (hotel) floorspace, in accordance with Section 4 of Planning Policy Wales.
- 3.25 A sequential test has been carried out for the proposed Use Class A3 floorspace despite policy support for such uses in employment allocations, as set out in draft LDP Policy EM2.
- 3.26 The proposed A1/A3/C1 uses are applied for in outline as part of this hybrid application. As such the total floorspace for the individual uses is not fixed. The Transport Assessment which accompanies application reference P/2023/0497 has assumed that the hotel could accommodate 100 bedrooms. For the purposes of this sequential test we have considered that this would equate to a site size of 0.65ha. The size of the proposed retail and food and drink units would be considerably smaller and therefore a minimum site size of 350 sq m has been considered as the site size threshold. The drive thru units shown on the submitted Illustrative Masterplan are c. 460 sq m; therefore applying a site threshold of 350 sq m shows flexibility in the Applicant's approach.
- 3.27 The findings of the sequential test are explored in the next section.

4.0 Sequential Test

- 4.1 The application site is out of centre in sequential terms. CBRE has sought to establish whether there are any sequentially preferable sites within or on the edge of a designated centre, which are capable of accommodating the proposed development. It is considered that in operating in the 'real world', the approach to site selection should not fundamentally compromise the development as proposed.
- 4.2 Policy R1 *Retail, Leisure and Commercial Centre Hierarchy* of the emerging LDP sets out the centre hierarchy for proposals:
- Wrexham Town Centre,
 - The District Centres of Cefn Mawr and Gwersyllt,
 - The Local Centres of Borras, Chirk, Coedpoeth, Gresford, Llay, Penybryn and Rhosllanerchrugog,
 - The Village Centres of Brynteg, Holt, Ruabon and Rossett, and
 - The Neighbourhood Centres of Churchill Drive, Garden Village and Park Avenue, Wrexham.
- 4.3 The approach taken to identify potentially sequentially preferable sites is set out below:
1. CBRE identified all available sites within or on the edge of Wrexham Town Centre which are being actively marketed; and
 2. CBRE reviewed all hotels currently marketed for sale within the Wrexham borough to identify any potentially available sites.
- 4.4 For the purposes of the assessment, 'edge of centre' was taken to mean sites within 300m of the centre boundary. The assessment approach is set out below, in relation to suitability and availability, in line with the requirements of TAN 4.

Availability & Suitability

- 4.5 The availability of sites has been assessed using the following steps:
1. CBRE identified all available sites within or on the edge of Wrexham Town Centre which are being actively marketed;
 2. CBRE reviewed all hotels currently marketed for sale within Wrexham to identify any potentially available sites;
 3. Consideration as to whether the identified sites meet the site size threshold; and
 4. Consideration of the suitability of the sites in relation to the proposed development.
- 4.6 CBRE has used the following websites to identify all available sites which are being actively marketed:
- a. Rightmove
 - b. Property Link Estates Gazette
 - c. AddLand

- 4.7 The site of the proposed hotel is c. 0.65ha and therefore sites over 0.5ha have been considered as complying with the site size threshold. For the A1 and A3 uses, the proposed units are c. 460 sq m each and, in order to adopt a flexible approach, a site size threshold of 350 sq m has been applied.
- 4.8 All of the sites are either in or on the edge of centres in order to comply with the settlement hierarchy as set out in Section 2.0 of this report.
- 4.9 The table below sets out the sites which have been identified:

Table 4.1 – Schedule of sites being actively marketed in or on the edge of defined centres

No.	Address	Use Class (if applicable)	Size	Marketing Details / Comments	Link	A1 / A3 Commentary	C1 - Commentary	Outcome
1	Maes Eithan, Brynteg, Wrexham	C3	348 sq m	Jones Peckover, Denbigh	Plot for sale in Maes Eithan, Brynteg, Wrexham, LL11 (rightmove.co.uk)	Site size threshold not met	Site size threshold not met	Site Discounted
2	Residential Development Site, Henblas Road, Rhostyllen, Wrexham, LL14 4AD	C3	0.114 ha	Halls Commercial, Shrewsbury	Land for sale in Residential Development Site, Henblas Road, Rhostyllen, Wrexham, LL14 4AD, LL14 (rightmove.co.uk)	Site size threshold is met however the site is located within the town centre and therefore the location is not considered appropriate to meet the locational requirements due to the purpose of the A1/A3 units being to serve the users of Wrexham Industrial Estate.	Site size threshold not met	Site Discounted
3	St Giles Way Wrexham Town Centre, Wrexham, LL13 7DD	N/A - Suitable for mixed use development to include offices, restaurant, leisure, hotel, residential or community use subject to planning	1.19ha	Lambert Smith Hampton, Manchester	Office for sale in St Giles Way Wrexham Town Centre, Wrexham, LL13 7DD, LL13 (rightmove.co.uk) A Commercial Property For Sale In Wrexham, Wrexham, LL13 8NB 	Site size threshold is met however the site is located within the town centre and therefore the location is not considered appropriate to meet the locational requirements of the	The site is located within Wrexham Town Centre and therefore the location is not considered appropriate to meet the locational requirements of the	Site Discounted

					Freehold 1.19 Hectares (estatesgazette.com)	the locational requirements due to the purpose of the A1/A3 units being to serve the users of Wrexham Industrial Estate.	hotel and lorry park. The site is also almost double the size of the current proposed site of the hotel.	
4	Wrexham - 19TH Century Town Centre Public House	A3	360 sq m – approximate site area	Sidney Phillips Limited, North West	Pub for sale in Wrexham - 19TH Century Town Centre Public House, LL11 (rightmove.co.uk)	Site size threshold is met however the site is located within the town centre and therefore the location is not considered appropriate to meet the locational requirements due to the purpose of the A1/A3 units being to serve the users of Wrexham Industrial Estate.	Site size threshold not met.	Site Discounted
5	Bangor University Investment, Wrexham Campus, Unit C, Archimedes Centre, Wrexham LL13 7YP	B1	633 sq m	Bolton Birch, Chester	Office for sale in Bangor University Investment, Wrexham Campus, Unit C, Archimedes Centre, Wrexham LL13 7YP, LL13 (rightmove.co.uk)	Site size threshold is met however the site is located within the town centre and therefore the location is not considered appropriate to meet the locational	Site size threshold not met	Site Discounted

									requirements due to the purpose of the A1/A3 units being to serve the users of Wrexham Industrial Estate.	
6	Brynisa Road, Brynteg	C3	0.17ha	Town & Country Estate Agents, Wrexham	Plot for sale in Brynisa Road, Brynteg, LL11 (rightmove.co.uk)	Site size threshold is met however the site is located within the town centre and therefore the location is not considered appropriate to meet the locational requirements due to the purpose of the A1/A3 units being to serve the users of Wrexham Industrial Estate.	Site size threshold not met		Site Discounted	
7	High Street, Pentre Broughton	A1 / C3	45 sq m	Town & Country Estate Agents, Wrexham	Hairdressers or barber shop for sale in High Street, Pentre Broughton, LL11 (rightmove.co.uk)	Site size threshold not met.	Site size threshold not met.		Site Discounted	
8	Henblas Road, Rhostyllen, Wreccsam, LL14 4AD	C3	0.114ha	Halls	A Commercial Property For Sale In Wrexham, Wrexham, LL14 4AD Freehold 0.28 Sq Ft (estatesgazette.com)	Site size threshold is met however the site is located within the town centre and therefore the location is not	Site size threshold not met		Site Discounted	

considered appropriate to meet the locational requirements due to the purpose of the A1/A3 units being to serve the users of Wrexham Industrial Estate.

9	Site At Royal British Legion, Llay New Road, Watts Dyke, Llay, Wrexham, LL12 ORL	The property comprises a development site extending to 0.53 acres with detailed planning permission for a new build convenience store extending to 3,820 sq ft together with 16 car parking spaces and a new, independent access from Llay New Road	0.21ha	Legat Owen	A Land For Sale Or Rent In Wrexham, Wrexham, LL12 ORL Freehold 0.53 Acres (estatesgazette.com)	Site size threshold is met however the site is located within the town centre and therefore the location is not considered appropriate to meet the locational requirements due to the purpose of the A1/A3 units being to serve the users of Wrexham Industrial Estate.	Site size threshold not met	Site Discounted
10	Plot at Summerfields, Rhostyllen, Wrexham, LL14 4EU	C3	800 sq m	Auction House Cheshire & North Wales	Plot at Summerfields Bare for sale in Wrexham Addland	Site size threshold is met however the site is located within the town centre and therefore the location is not considered appropriate to meet the locational	Site size threshold not met	Site Discounted

requirements due to the purpose of the A1/A3 units being to serve the users of Wrexham Industrial Estate.

11	Railbridge Court and Tyrewise	B2/B8	0.12 ha	Bowen Son and Watson - Wrexham	Railbridge Court and Tyrewise Industrial for sale in Wrexham Addland	Site size threshold is met however the site is located within the town centre and therefore the location is not considered appropriate to meet the locational requirements due to the purpose of the A1/A3 units being to serve the users of Wrexham Industrial Estate.	Site size threshold not met	Site Discounted	Site Discounted
12	Salem Chapel, Pysgah Hil, Pentre Broughton, Wrexham, LL11 6DB	D1	300 sq m	Connect UK Auctions - Crawley	Salem Chapel Conversion for sale in Wrexham Addland	Site size threshold not met	Site size threshold not met	Site Discounted	
13	Ruabon Road, Wrexham	A1	100 sq m	Bowen	High street retail property for sale in Ruabon Road, Wrexham, LL13 (rightmove.co.uk)	Site size threshold not met	Site size threshold not met	Site Discounted	

					8 & 8a Ruabon Road Retail for sale in Wrexham Addland			
14	Kingsmills Road, Wrexham	A1 / C3	230 sq m (approx. site area)	Wingetts	Commercial property for sale in Kingsmills Road, Wrexham, LL13 (rightmove.co.uk)	Site size threshold not met	Site size threshold not met	Site Discounted
15	North Road	C3	1.06ha	Bowen Son and Watson	Development Opportunity at North Road Small Site for sale in Wrexham Addland	Site size threshold is met however the site is located within the town centre and therefore the location is not considered appropriate to meet the locational requirements due to the purpose of the A1/A3 units being to serve the users of Wrexham Industrial Estate.	The site is located within Wrexham Town Centre and therefore the location is not considered appropriate to meet the locational requirements of the hotel and associated lorry park. The site is also almost double the size of the current proposed site of the hotel.	Site Discounted
16	32, 34 & 36 High Street	A1	188 sq m	Bowen Son and Watson	32, 34 & 36 High Street Retail for sale in Wrexham Addland	Site size threshold not met	Site size threshold not met	Site Discounted
17	7 Edison Court, Ellice Way, Wrexham	B1	205 sq m	Legat Owen	An Office Space For Sale Or Rent In Wrexham, Wrexham,	Site size threshold not met	Site size threshold not met	Site Discounted

	Technology Park					LL13 7YT Freehold 2,211 Sq Ft (estatesgazette.com)			
18	51 King Street	B1	131 sq m	BA Commercial		An Office Space For Sale In Wrexham, Wrexham, LL11 1HR Freehold 1,410 Sq Ft (estatesgazette.com)	Site size threshold not met	Site size threshold not met	Site Discounted
19	16 Lord Street	B1	0.168 ha	Legat Owen		An Office Space For Sale Or Rent In Wrexham, Wrexham, LL11 1LG Freehold 18,075 Sq Ft (estatesgazette.com)	Site size threshold is met however the site is located within the town centre and therefore the location is not considered appropriate to meet the locational requirements due to the purpose of the A1/A3 units being to serve the users of Wrexham Industrial Estate.	Site size threshold not met	Site Discounted
20	13-16 Street	Hope A1	0.35 ha	Legat Owen		A High Street Shop For Sale Or Rent In Wrexham, Wrexham, LL11 1BG Freehold 37,690 Sq Ft (estatesgazette.com)	Site size threshold is met however the site is located within the town centre and therefore the location is not considered appropriate to meet the locational	Site size threshold not met	Site Discounted

requirements due to the purpose of the A1/A3 units being to serve the users of Wrexham Industrial Estate.

21	Unit Queensway Industrial Estate	13	B2/B8	0.15 ha – 0.4 ha	Legat Owen	An Industrial Property For Sale Or Rent In Wrexham, Wrexham, LL13 8YR Freehold 15,820 - 43,420 Sq Ft (estatesgazette.com)	Site size threshold is met however the site is located within the town centre and therefore the location is not considered appropriate to meet the locational requirements due to the purpose of the A1/A3 units being to serve the users of Wrexham Industrial Estate.	Site size threshold not met	Site Discounted
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4.10 The table below sets out all hotels which are currently being marketed within the Wrexham local authority area.

Table 4.2 – Schedule of hotels being actively marketed

No.	Address	Size	Marketing Details / Link Comments	Commentary	Outcome	
1	Holt Lodge, Wrexham Road, Holt LL13 9SW	3ha	Fleurets Limited, North West	Hotel for sale in NW-122258 - Holt Lodge, Wrexham Road, Holt LL13 9SW, LL13 (rightmove.co.uk)	This site is available and meets the minimum site threshold for the hotel but is not within a sequentially preferable location as it is also out-of-centre. Holt Lodge is also 2.7km away from the Industrial Estate and is therefore in a less suitable location to serve the Industrial Estate, compared with the application site.	Site Discounted
2	The Mulberry Inn, Llwynmawr, Llangollen, Wrexham, LL20 7BB	0.25ha	Christie & Co, Hotels	Hotel for sale in The Mulberry Inn, Llwynmawr, Llangollen, Wrexham, LL20 7BB, LL20 (rightmove.co.uk)	Site size threshold not met	Site Discounted
3	Hand Church Wrexham 5EY	Hotel, Street, LL14 0.38ha	Fleurets Limited, North West	Hotel for sale in M-227372 - Hand Hotel, Church Street, Wrexham LL14 5EY, LL14 (rightmove.co.uk)	Site size threshold not met	Site Discounted

- 4.11 Table 4.1 sets out all of the sites which are being actively marketed within or adjacent to Wrexham Town Centre. However whilst there are several sites, a number of these have been discounted as they do not meet the site size threshold. For the sites that do meet the site size threshold, they do not align with the locational requirements of the proposed uses as the sites are not within or adjacent to Wrexham Industrial Estate and have therefore been discounted as they are not suitable. This is because the purpose of the proposal is to provide the uses of the hotel, retail and food and drink outlets within the locality of Wrexham Industrial Estate, for the reasons set out in Section 3.0 of this report.
- 4.12 CBRE has reviewed all available hotels which are currently being marketed within Wrexham to identify if any hotel sites are available and being actively marketed which would meet the requirements of the hotel proposed as part of the scheme. These are set out in Table 4.2.
- 4.13 The Applicant notes that one of the hotels being marketed, Holt Lodge, is 2.7km to the north of the application site. This site is available and meets the minimum site size threshold but is not within a sequentially preferable location as it is also out-of-centre. Holt Lodge is also 2.7km away from the Industrial Estate and is therefore in a less suitable location to serve the Industrial Estate, compared with the application site.
- 4.14 There are no other hotels available for sale or available sites which have been identified by the Applicant within Wrexham Town Centre or on the edge of the town centre which would accommodate the proposal.

Accessibility

- 4.15 In line with the guidance set out in TAN 4, if a suitable site or building to meet identified need is not available within a retail and commercial centre or centres, then consideration should be given to edge of centre sites and if no such sites are suitable or available, only then should out of centre sites in locations that are accessible by a choice of travel modes, including active travel and public transport, be considered.
- 4.16 As demonstrated above, there are no available and suitable sites in a sequentially preferable location.
- 4.17 The Applicant has demonstrated in the submitted Transport Assessment that the application site is located in an accessible location enabling visitors and employees to make use of the existing public transport links and pedestrian / cycle facilities. The close proximity and links between the application site and Wrexham Industrial Estate therefore support the proposed non-employment uses as the proposal will be accessible via sustainable means to the target market, which is users of and visitors to the Industrial Estate.

5.0 Conclusions

- 5.1 This report has demonstrated that there is policy support for the proposed Use Class A3 uses in emerging LDP Policy EM2.
- 5.2 In light of the Applicant's proposed floorspace restriction on retail uses (Use Class A1), there is no requirement for an impact assessment to be prepared in relation to this application.
- 5.3 The need for the proposed non-employment uses has been demonstrated in Section 3.0 of this report, alongside the submitted Planning Statement.
- 5.4 The sequential test undertaken by CBRE has identified that there are no suitable or available sites which are capable of accommodating the proposed hotel, retail or food and drink outlets within the existing centres or edge of centre sites within Wrexham.
- 5.5 CBRE has undertaken a review of all available sites within or on the edge of Wrexham Town Centre, reviewed hotels currently marketed for sale and considered allocated sites within Wrexham Town Centre or on the edge of centre in the LDP to identify if alternative sites could be considered.
- 5.6 The review has concluded that there are no available sites within or on the edge of Wrexham Town Centre which meet the site size threshold and which are considered suitable.
- 5.7 The proposed development is a logical extension to Wrexham Industrial Estate with accessibility via non-car modes, including public transport and walking/cycle facilities from the site to the remainder of the Industrial Estate.
- 5.8 In the absence of any other sequentially preferable available or suitable sites being identified at the time of the planning application submission, it is concluded that the application site passes the sequential test set out in PPW, TAN 4 and Policy R6 of the emerging LDP.
- 5.9 The non-employment uses proposed are therefore considered to meet the requisite retail policy tests.