

205 Stockport Road,
Altrincham,
Manchester,
WA15 7SW

Mr Matthew Phillips,
Head of Service,
Planning Development Management,
Wrexham County Borough Council,
Guildhall,
Wrexham,
LL11 1AY

Sent via email only to: Matthew.Phillips@wrexham.gov.uk

26th October 2023

Dear Matthew,

Planning application reference P/2022 /0229
Land at Five Crosses Inn, Ruthin Road, Minera, Wrexham, LL11 3UT

I write further to your email dated 26th September 2023 in respect of planning application reference P/2022/0229, which is seeking an extension of time to implement planning permission to erect a Use Class A1 convenience store with associated car parking, access, landscaping and an ATM machine at the land to the rear of the Five Crosses Inn, Ruthin Road, Minera. In your email you request that the Applicant undertake a retail assessment to take account of the emerging Wrexham Local Development Plan policies.

The Site

The Site comprises of a surface level car park to the rear of the Five Crosses Inn, Minera.

To the north of the Site is a large industrial area; to the east of the Site (along Gwernygaseg Road) is a row of traditional dwelling houses; and to the south is a residential area linking the Site with Coedpoeth. To the west is Ruthin Road (A525).

The Site benefits from planning permission for the erection of a Use Class A1 convenience store with associated car parking, access, landscaping and an ATM machine which was granted planning permission at appeal on 6th March 2017 (appeal reference APP/H6955/A/16/3163233). The store has a gross floor area of 325 square metres.

This current application is seeking to extend the timescales of this planning permission, as it is yet to be implemented.

Planning Policy Context

The current Development Plan for Wrexham County Borough Council is the Unitary Development Plan (UDP),



07989 327 331
hayley@hkplanning.ltd
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which was adopted in 2005. The original application, and subsequent allowed appeal were considered against the UDP. No further assessment against these policies is therefore provided in this assessment.

Whilst the Wrexham Local Development Plan (LDP) has been through public hearings sessions and found sound by the appointed Inspector, I note that Wrexham Councillors have twice voted to refuse to adopt the LDP. As such the LDP is yet to be adopted, and it is unknown when the LDP will be adopted. The policies of the LDP therefore do not benefit from the full weight of adopted policies, nevertheless this letter considers the proposals against emerging LDP Policies R1 and R6 in order to progress the application.

Policy R1 sets out the retail hierarchy, and sets out support for development where it is appropriate in scale for the particular centre.

The Site however is in an out of centre location and therefore Policy R6 applies, which sets out the tests against which retail, leisure and commercial development located in edge and out of centre locations will be assessed.

Retail Assessment

The Site falls within the settlement boundaries of Coedpoeth on the emerging LDP Proposals Map. Coedpoeth is also the nearest identified retail centre to the Site. From your email I understand that you agree that given the modest scale of the proposed retail convenience store this is the only retail centre that we need to consider.

As set out in Policy R6 the retail tests to be considered are as follows:

- i. There is a need for the proposed floor-space (with precedence accorded to establishing quantitative need); and*
- ii. The proposal complies with the sequential test above; and*
- iii. The proposal would not cause unacceptable harm to the vitality, attractiveness or viability of Wrexham City Centre, a District, Local, Village or Neighbourhood centre; and*
- iv. The site is accessible by a choice of means of transport; or*
- v. The proposal is for small scale retail development with a floor-space of 100m² or less meeting local needs.*

Taking each of the above points in turn:

Need for the proposals: the need for additional convenience store provision in Coedpoeth is generally accepted in the Retail and Commercial Centre Review (March 2017)¹ which formed part of the evidence base for the emerging Wrexham LDP, as it states on page 18 of the report that

'The Wrexham Retail Assessment (2014) identified Coedpoeth and the surrounding area as an area where there is scope to improve local provision due to its low retention of convenience spend (4.4%) with Morrison's on Ruthin Road in Wrexham as the dominant store, though it is worth noting that since the Retail Assessment was completed Spar opened a new large convenience store just outside the

¹ See here <http://wrexham-consult.objective.co.uk/file/5113524>



retail centre (2016).'

The Spar remains open in the village, and is of a similar scale to that of the proposed convenience store. As such whilst it will inevitably be meeting some of the retail need to stem the leakage of convenience spend outside of the catchment, it is not sufficient to meet all of the need given only 4.4% of spend was being retained in 2014. The proposal will therefore go some way to meeting the identified local need.

Sequential Test: the proposed development is modest in scale, with an anticipated local catchment only. As set out above it is understood that this assessment only needs to consider the nearby Local Centre of Coedpoeth.

It is important to set out site criteria against which to assess the suitability of potentially sequentially preferable sites. It is generally accepted to allow for 10% increase or decrease in floorspace when identifying preferable sites, so the range of floorspace for a suitable alternative unit is 292.5 - 357.5 square metres. In addition a key feature of the Site is the provision of off-street parking for at least 20 cars, this is key to the success of convenience stores in today's market, and indeed is a key feature of new Spar store in the village.

A survey was done of Coedpoeth Local Centre as identified on LDP Proposals Map on 5th October 2023 during which any vacant units located within or on the edge of the centre were identified. These were as follows:

- Mr Pizza / Sheikh Balti House- vacant but no 'for sale/to let' sign, as such this unit is not considered to be available and has been discounted;
- Unit at the corner of High Street and Tabor Hill- vacant but no 'for sale/to let' sign, as such this unit is not considered to be available and has been discounted;
- Former Spar Unit, High Street²- the unit is available, evidenced by the fact its details are advertised by a board and on the Rightmove web-site. Having reviewed the units particulars it is clear that the Former Spar is not a suitable alternative as the basement and ground floor together total only 186 sq.m and therefore falls far short of the area requirement. In addition whilst the Former Spar appears to have a parking area adjacent to the unit, it is unclear if these would be available for the use for patrons of the Former Spar shop. In conclusion this unit is not suitable due to its small size and the lack of clarity in respect of off-street parking availability; and
- Former Debutante Hair, Heol Maelor, High Street³- the unit is available, evidenced by the fact its details are advertised by a board, and is on the Rightmove web-site. Having reviewed the units particulars it is clear that the Former Debutante unit is not a suitable alternative as the ground floor (53.13 sq.m) falls far short of the area requirements for the new convenience store. In addition the particulars confirm that the unit only benefits from an outside garden area to the rear of the unit, but no off-street parking. In conclusion this unit is not suitable due to its smaller size and the lack of off-street parking.

² See here for property details: [High street retail property for sale in High Street, Coedpoeth, Wrexham, LL11 \(rightmove.co.uk\)](https://www.rightmove.co.uk/property-for-sale/details.do?listingId=123456789)

³ See here for property details: [Hairdressers or barber shop for sale in Heol Maelor, Coedpoeth, LL11 \(rightmove.co.uk\)](https://www.rightmove.co.uk/property-for-sale/details.do?listingId=987654321)



A search on Rightmove's commercial property pages on 25th October 2023 for commercial properties both to let and for sale. See screengrabs in Annexes 1 and 2 of this letter for commercial 'to let' and 'for sale' properties respectively. These searches reflected the observations noted during the Local Centre Survey, and as such no further properties need to be assessed. As set out above none of the identified properties are considered to be suitable alternatives to the application site.

Harm to identified centres: given the modest scale of the development and its restriction to convenience food provision, it is unlikely to impact the retail offer that is available in Wrexham City Centre or Coedpoeth Local Centre. This size and type of store is typically frequented by people living or working within walking distance of the Site, and an element of pass-by trade give its location on the A525, Ruthin Road. The proposed development will therefore not harm the vitality and viability of the either Wrexham City Centre or Coedpoeth Local Centre.

Accessibility: the site benefits from good transport links, notably the bus stops within walking distance on Ruthin Road (A525) 70 metres to the south of the Site, and on the B5430 approximately 100 metres to the south-east of the Site. These bus stop provide regular links to Wrexham, Minera, Denbigh and Llay. In addition the Site is within walking and cycling distance of Coedpoeth Local Centre, which is approximately 750 metres to the south-east of the Site. The Site is also well serviced by roads. The Site is therefore considered to be accessible by a range of modes of transport.

Summary and Conclusion

Firstly the original permission, which we are seeking to extend time limits for implementation for, was assessed by an external Planning Inspector against the adopted UDP policies and an appeal allowed on this basis. LDP Policy R6 is only an emerging policy and should be afforded weight accordingly.

Nevertheless when assessing the proposals against the emerging LDP Retail Policy R6 it is considered that proposal for an out of centre retail use at the site is considered to be acceptable. There is a clear need for the convenience store, given the leakage of expenditure for convenience goods in the Coedpoeth catchment as identified in the Council's evidence base for the emerging LDP. It has been evidenced that there are no sequentially preferable site that could accommodate the development, and that the Site is in an accessible location. I therefore respectfully request that the application be approved without delay.

Yours sincerely,



Hayley Knight
Director, Hayley Knight Planning Limited
Telephone: 07989 327 331
E-mail: hayley@hkplanning.ltd

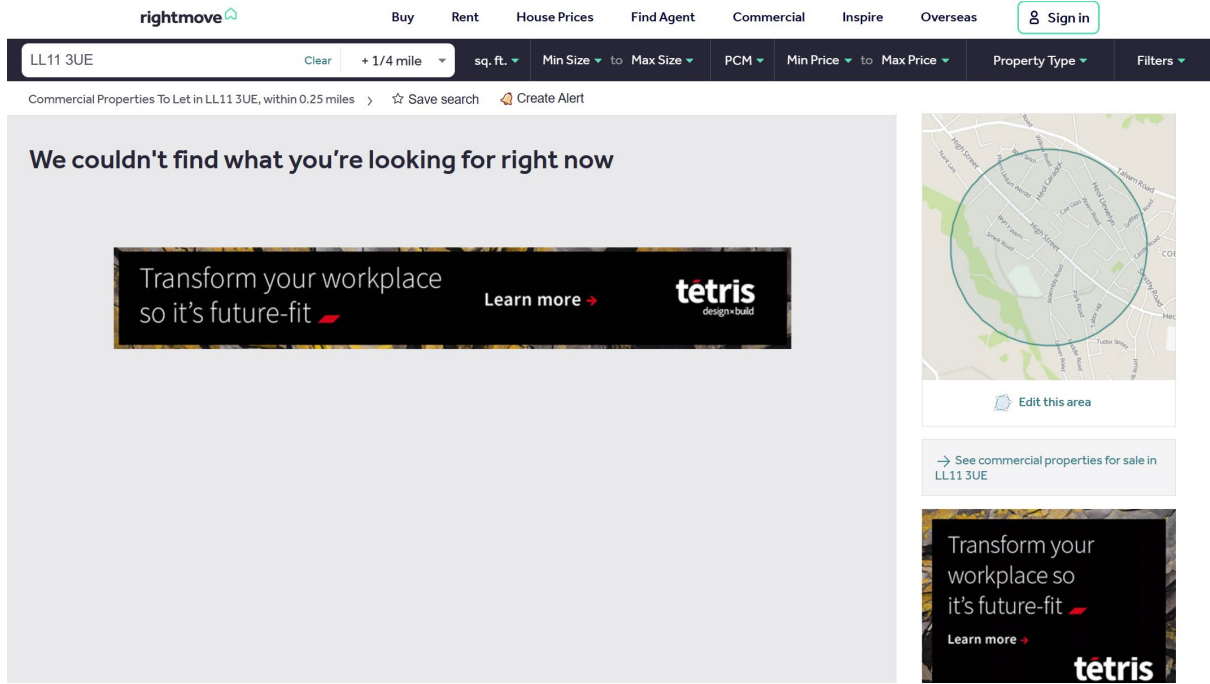


☎ 07989 327 331
✉ hayley@hkplanning.ltd
🌐 hkplanning.ltd



Annex 1

Screengrab of a searches for 'to let' commercial properties in Coedpoeth on Rightmove searches undertaken on 25th October 2023:



The screenshot shows the Rightmove website interface. At the top, there's a navigation bar with links for Buy, Rent, House Prices, Find Agent, Commercial, Inspire, and Overseas, along with a Sign in button. Below this is a search bar containing 'LL11 3UE' and a radius of '+ 1/4 mile'. The search results section displays a message: 'We couldn't find what you're looking for right now'. Below this message is a large advertisement for 'têtris design+build' with the text 'Transform your workplace so it's future-fit' and a 'Learn more' link. To the right of the main content area, there is a map showing the search location in Coedpoeth, a link to 'Edit this area', and a link to 'See commercial properties for sale in LL11 3UE'. At the bottom right, there is another 'têtris design+build' advertisement.



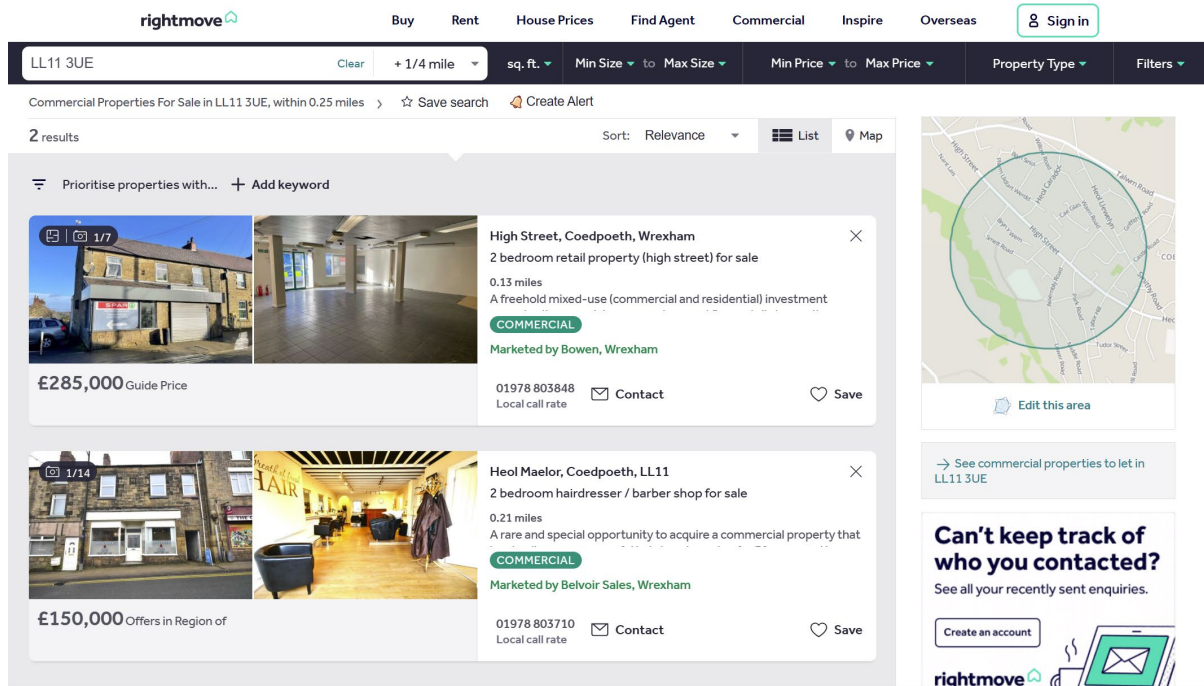
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Annex 2

Screengrab of a searches for 'for sale' commercial properties in Coedpoeth on Rightmove searches undertaken on 25th October 2023:



The screenshot shows a Rightmove search results page for commercial properties in Coedpoeth, Wrexham. The search criteria are set to 'LL11 3UE' with a radius of '+ 1/4 mile'. The results are sorted by 'Relevance' and displayed in a list view. Two properties are shown:

- High Street, Coedpoeth, Wrexham**: A 2 bedroom retail property (high street) for sale. Price: £285,000 (Guide Price). 0.13 miles. A freehold mixed-use (commercial and residential) investment. Marketed by Bowen, Wrexham. Contact: 01978 803848.
- Heol Maelor, Coedpoeth, LL11**: A 2 bedroom hairdresser / barber shop for sale. Price: £150,000 (Offers in Region of). 0.21 miles. A rare and special opportunity to acquire a commercial property that. Marketed by Belvoir Sales, Wrexham. Contact: 01978 803710.

On the right side of the page, there is a map showing the search area and a promotional banner for Rightmove's 'Can't keep track of who you contacted?' feature.



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