

**Mixed-Use Redevelopment of
Wrexham Police Station
Bodhyfryd/Powell Road
Wrexham**

**Planning, Heritage and Retail
Statement**

On behalf of Lidl UK GmbH

June 2018



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Contents	Page
1. Introduction	1
2. Application Site and Development Proposals	2
3. Planning Policy Review	6
4. Planning Statement	11
5. Heritage Statement	16
6. Retail Statement: Need	18
7. Retail Statement: Sequential Approach	20
8. Retail Statement: Impact	25
9. Conclusions	26

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Appendices

Appendix 1

Drive Time Plan

1. Introduction

- 1.1. This Planning, Heritage and Retail Statement has been prepared by Plan A (North West) Limited in support of a full planning application made on behalf of Lidl UK GmbH (the Applicant) to deliver a mixed-use development comprising a Lidl foodstore and a drive-through coffee shop on the site of the North Wales Police Headquarters on Bodhyfryd/Powell Road in Wrexham.
 - 1.2. The Statement sets out the merits of the proposed development in accordance with national and local planning policy guidance.
 - 1.3. This Statement adopts the following structure:
 - Section 2: describes the application site and the proposed development;
 - Section 3: provides a review of relevant planning policies;
 - Section 4: presents the planning statement;
 - Section 5: provides a heritage statement;
 - Sections 6 to 8: comprise the retail statement; and
 - Section 9: forms the conclusions.
 - 1.4. The proposal has been the subject of pre-application discussions with the Local Planning Authority the outcome of which has been taken into account when preparing this application.
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2. Application Site and Development Proposals

Application Site

- 2.1. The application site extends to approximately 1.09ha and currently accommodates Wrexham Police Station, which remains in occupational use pending the relocation of the front of house function to a site next to the library in Wrexham Town Centre and a brand new command and custody base located in Llay.
- 2.2. The site is currently dominated by a multi-storey tower block and lower level buildings, comprising offices, a custody suite and garaging and stores, together with external areas of car parking and soft landscaping. Vehicular access is taken from a roundabout on Powell Road/Bodhyfryd directly into the site, with pedestrian and cyclist access also available from all sides of the site.
- 2.3. Neighbouring uses include residential dwellings fronting Powell Road, separated from the site by a public footpath running to a subway under Powell Road, Wrexham Memorial Hall, a Magistrates Court, the Town's leisure centre, a town centre car park and an Asda superstore. The site is located approximately 320m walking distance to the north of the closest Principal Shopping Street and 250m walking distance from the closest edge of the Shopping Area in Wrexham Town Centre.
- 2.4. Further details about the application site and surrounding area are provided in the accompanying Design and Access Statement.

Proposed Development

- 2.5. It is proposed to demolish all existing buildings and structures on the application site to facilitate its redevelopment to deliver a mixed-use scheme comprising the following:
 - A Class A1 retail unit, to be occupied by Lidl;
 - A Class A1/A3 drive-through coffee shop; and
 - A 151-space car park to support the proposed uses.
- 2.6. Further details about the elements of the proposal are provided below.

Lidl Store

- 2.7. The proposed Lidl store will comprise a 2,125m² gross single storey Class A1 foodstore, served by a total of 121 parking spaces, to include 7 mobility impaired and 8 parent and child spaces, together with cycle parking facilities.
 - 2.8. Vehicular access to the site will be as existing, taken directly from the roundabout at the junction of Powell Road with the A5152. The access will be adjusted to suit current design standards.
 - 2.9. Pedestrian access will be introduced from the south, east and west of the site allowing ease of access from all directions and improving linkage across the site. A number of pedestrian crossings are proposed within the site to ensure safety along the key desire lines.
 - 2.10. Further details about the design concept are provided in the accompanying Design and Access Statement.
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Lidl 'Deep Discount' Format

- 2.11. Lidl's history dates back to the 1930s when '*Lidl and Schwarz Grocery Wholesale*' was founded in Germany. Since then, the Company has diversified into hypermarkets (known as '*Kaufland*') and discount foodstores (known as '*Lidl*'). Today, the Schwarz Group is one of the largest global retailers. During the 1990s, Lidl commenced opening stores outside Germany, and are now found in 27 European countries. The Lidl format is already well established in the UK with over 700 stores.
- 2.12. The Company philosophy is all about simplicity, this being to offer customers everyday quality at the best possible prices. The Company's basic approach is equally straightforward and eminently sensible, this being to provide modest stores serving local needs at convenient locations close to residential areas. Lidl's operation is based on a traditional supermarket format with deeply discounted prices and a limited range of own brand goods. The ability to offer discounted prices to customers is achieved through economies of pan-European bulk purchasing, minimisation of distribution costs and the careful control of property and operational costs.
- 2.13. A Lidl store offers a range of around 2,000 products all at discount prices. Items sold include:
- A range of own-branded dry groceries, frozen foods and tertiary branded wines and spirits;
 - A small range of fresh and frozen pre-packaged meat, but no specialist butchery or delicatessen counter;
 - A range of fruit and vegetables, mainly pre-packaged;
 - Pre-packaged sliced bread as well as a new selection of artisan bread and cakes baked on the premises; and
 - A basic range of non-food household items accounting for up to 20% of the sales area.
- 2.14. The Lidl format differs from that of many other supermarket traders, primarily through the heavily discounted pricing structure and the very limited range of goods on offer. At around 2,000 product lines per store, the range of goods is significantly smaller than those offered by other leading retailers. For example, many modern superstores offer tens of thousands of product lines. Moreover, Lidl does not compete in the same market as many independent or specialist traders such as confectioners, greengrocers or butchers. Lidl do not sell cigarettes or single confectionery items, do not include pharmacies or post offices and no meat or fish preparation takes place on the premises.
- 2.15. Lidl stores are clearly popular with their customers, as they offer high quality goods at very low prices. Lidl operate on far lower profit margins than the major foodstore operators and, due to their efficient productive approach, savings made operationally are passed on to the customer.
- 2.16. The proposed Lidl store will have distinctive trading characteristics that are largely complementary to traditional high street convenience stores. Indeed, deep discounters rarely provide a one-stop shopping experience and, as such, customers also tend to use other shops and facilities in the locality to supplement their deep discount shop.

Drive-Through Coffee Shop

- 2.17. Full planning permission is sought for the erection of a 187m² gross mixed Class A1/A3 coffee shop with ancillary drive-through, a 30-space car park and associated works. This element of the proposal is speculative in nature and does not have an associated operator at this stage, with it being the Applicant's intention to dispose of the site to an operator
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should this planning application be approved.

- 2.18. The primary use of the proposal will be the sale of hot drinks for consumption both on and off the premises. The sale of drinks for consumption off the premises (Class A1) is likely to be broadly even to the sale of drinks for consumption on the premises (Class A3), hence the mixed use classification. The drive-through function is considered ancillary to the function of selling drinks for consumption off the premises.
- 2.19. The coffee shop is not expected to sell hot food, other than toasted sandwiches. Whilst sandwiches, confectionery and cold drinks will also be offered, the sale of such goods for consumption both on and off the premises aligns with the mixed-use classification.
- 2.20. The Applicant accepts that the nature of the proposed use comprises both Class A1 retail and Class A3 food and drink, which, if unrestricted, could evolve into a different end-use without the need for planning approval. Accordingly, the Applicant is prepared to accept a restriction upon the use of the proposed coffee shop building, with the following condition proposed:

'The premises shall be used as a cafe and coffee house and for no other purpose , including any other purposes in Class A3 of the Schedule to the Town and Country Planning (Use Classes) Order 1987, or in any provision equivalent to that Class in any statutory instrument and re-enacting that Order'.

Operational Matters

Opening Hours

- 2.21. The Lidl store's opening hours will be 7am to 10pm Monday to Saturdays and for a six-hour period between 10am and 5pm on Sundays.
- 2.22. The proposed drive-through coffee shop is expected to trade between 6am and 11pm daily.

Servicing and Waste Management

- 2.23. The Lidl store will typically receive two deliveries per day, which will be sourced from the regional distribution hub in Runcorn. Delivery vehicles reverse down a ramp to a dock leveller, which ensures that the bed of the trailer is the same height of the store floor level. Goods are simply rolled from the trailer into the building in an efficient and comparatively quiet manner.
- 2.24. Lidl's delivery vehicle will take all waste away from the store for recycling or disposal at the distribution centre. It typically takes 30 to 45 minutes to unload the delivery vehicle and to re-pack it with waste products and recycling.
- 2.25. The coffee shop is expected to be serviced by one delivery per day comprising a large transit van or 18 tonne wagon. Deliveries are expected to be typically received towards the beginning or end of the working day and to generally take around 10-minutes. In addition to deliveries, separate waste collections are expected to be undertaken seven days per week.

Trolley Management

- 2.26. Lidl will continue to control the use of shopping trolleys by a coin deposit system. Customers will be required to make a payment in order to release a secured trolley from the trolley bay. This payment will be returned when customers return the trolley to the trolley bay and leave it securely. Lidl's experiences at the existing store confirms that this system is an effective means of ensuring trolleys do not leave the site and, also, are returned to the trolley bay and secured appropriately.
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- 2.27. Trolleys will be stored in a trolley bay located under a canopy adjacent to the store entrance.

Cycle Parking

- 2.28. Secure cycle parking facilities will be located at the front of both the Lidl store and the coffee shop, where they will benefit from high levels of natural surveillance. Lidl staff travelling to and from the store by bicycle will also be able to park their bike internally within the warehouse area.

Car Park Management

- 2.29. The whole car park will be available free of charge for up to 90 minutes, which is sufficient time for customers to undertake a shop at the Lidl store (typically 30 minutes) and also carry out linked trips to other shops and services in the surrounding area.

Job Creation

- 2.30. The Lidl store will require between 25-40 employees depending on full and part-time make up to operate efficiently. The recruitment of employees will commence 4-6 months prior to opening to ensure that all staff are suitably trained and experienced prior to the new store opening.
- 2.31. All staff benefit from Lidl's commitment to paying the living wage, training and opportunities for career progression. The current Chief Executive of Lidl UK is testament to this genuine commitment, having started work on the shop floor and progressing through the business to his present position.
- 2.32. The coffee shop is expected to create up to 20 full-time equivalent jobs, which will comprise both full and part-time roles. It is expected that the majority, if not all, of the positions will be filled by local people.
- 2.33. Therefore, overall, the development is expected to create 45 full time equivalent jobs, which could translate into around 10 full time and 65 part-time jobs for local people.
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3. Planning Policy Review

- 3.1. This section of the Statement identifies the key planning policies and other guidance that is relevant to determination of this application.

National Guidance

Planning Policy Wales 9th Edition (November 2016)

- 3.2. Planning Policy Wales (PPW) forms the overarching national planning policy document for Wales and sets out the land use planning policies of the Welsh Government on a range of land use planning matters. Relevant aspects of PPW to the proposed development are summarised below.

Sustainable Development

- 3.3. The Welsh Government has a statutory duty in relation to sustainable development as set out in paragraph 4.1.2. The planning system also provides for a presumption in favour of sustainable development (paragraph 4.2.2).
- 3.4. Paragraph 4.4.3 identifies a series of objectives that development proposals should seek to achieve, with the following being of relevance:
- Promote resource-efficient and climate change resilient settlement patterns that minimise land-take (and especially extensions to the area of impermeable surfaces) and urban sprawl;
 - Promote access to employment, shopping, education, health, community, leisure and sports facilities and open and green space, maximising opportunities for community development and social welfare;
 - Locate developments so as to minimise the demand for travel, especially by private car;
 - Foster social inclusion by ensuring that full advantage is taken of the opportunities to secure a more accessible environment for everyone that the development of land and buildings provides. This includes helping to ensure that development is accessible by means other than the private car.
- 3.5. PPW notes the importance of planning for the consequences of climate change (paragraph 4.5.8), including reducing the vulnerability of the natural environment and built environment to climate change. In this respect, Paragraphs 4.12.2 and 4.12.3 confirm that development proposals must mitigate the causes of, provide effective adaptation to and resilience against the current and predicted future effects of climate change, for example by incorporating green space to provide shading and sustainable drainage systems to reduce run-off.

Good Design

- 3.6. PPW seeks to promote sustainability through good design:

'Design is taken to mean the relationship between all elements of the natural and built environment. To create sustainable development, design must go beyond aesthetics and include the social, environmental and economic aspects of the development, including its construction, operation and management, and its relationship to its surroundings.
(paragraph 4.11.1)

Good design can protect and enhance environmental quality, consider the impact of climate change on generations to come, help to attract business and investment, promote social inclusion and improve the quality of life.....' (paragraph 4.11.2)

3.7. Paragraphs 4.11.4 to 4.11.12 provide guidance on the requirements of good design. These include:

- Inclusive and accessible design;
- Promoting the efficient use of resources including land;
- Tackling the causes and providing effective adaptation to the effects of climate change;
- Offering high environmental quality, including open and green spaces; and
- The visual appearance of proposed development, its scale and its relationship to its surroundings and context are material planning considerations. Local planning authorities should reject poor building and contextual designs. However, they should not attempt to impose a particular architectural taste or style arbitrarily and should avoid inhibiting opportunities for innovative design solutions.

Transport

3.8. Paragraph 8.1.4 advises that the Welsh Government supports a transport hierarchy in relation to new development that establishes priorities in such a way that, whenever possible, they are accessible in the first instance by walking and cycling, then by public transport and then finally by private motor vehicles. In particular, paragraph 8.1.5 notes that land use planning can help to achieve the Welsh Government's objectives for transport through reducing the need to travel, especially by private car, and by locating development where there is good access by walking, cycling and public transport.

The Historic Environment

3.9. Chapter 6 provides national planning policy on the historic environment. Paragraph 6.2.1 states that it is important that the historic environment is protected, managed and conserved. The Welsh Government's objectives are to:

- Conserve and enhance the historic environment, which is a finite and non-renewable resource and a vital and integral part of the historical and cultural identity of Wales;
- Recognise its contribution to economic vitality and culture, civic pride, local distinctiveness and the quality of Welsh life, and its importance as a resource to be maintained for future generations; and
- Base decisions on an understanding of the significance of Wales' historic assets

Retail Proposals

3.10. With regard to the development management of retail proposals, paragraph 10.4.1 states:

'When determining a planning application for retail, leisure or other uses best located in a town centre, including redevelopment, extensions or the variation of conditions, local planning authorities should take into account:

- *compatibility with the development plan;*
 - *quantitative and qualitative need for the development/extension, unless the proposal is for a site within a defined centre or one allocated in an up-to-date development plan;*
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- *the sequential approach to site selection;*
- *impact on existing centres;*
- *net gains in floorspace where redevelopment is involved, and whether or not it is like-for-like in terms of comparison or convenience;*
- *rate of take-up of allocations in any adopted development plan;*
- *accessibility by a variety of modes of travel;*
- *improvements to public transport;*
- *impact on overall travel patterns; and*
- *best use of land close to any transport hub, in terms of density and mixed use.'*

Technical Advice Notes

- 3.11. Technical Advice Note 4 (November 2016) (TAN4) has regard to retailing and town centres. Paragraph 5 advises that there should be a clear vision through retail strategies, master planning and place plans for how a LPA wishes to see retail and commercial centres develop over the plan period. Paragraph 6 refers to all retail development proposals over 2,500m² gross being supported by an assessment of the impact of the proposal on town centres. It is stated that assessments may be required for some smaller developments that may be expected to have a large impact on a small centre.
- 3.12. Technical Advice Note 12 (March 2016) (TAN12) relates to design. Paragraph 2.4 advises that design is defined as *'the relationship between all elements of the natural and built environment. To create sustainable development, design must go beyond aesthetics and include the social, environmental and economic aspects of the development, including its construction, operation and management, and its relationship to its surroundings.'*
- 3.13. Technical Advice Note 18 (March 2007) (TAN18) relates to transport. Paragraph 3.7 relates to other major travel generating uses, which includes shopping, and states that such uses can:
- 'significantly influence the number and length of journeys, journey mode and the potential for multi-purpose trips. Development Plans should seek wherever possible to identify locations for such developments, which offer genuine and easy access by a range of transport modes and therefore:*
- *Allocate major generators of travel demand within city, town and district centres and near public transport interchanges, as a means to reduce car dependency and increase social inclusion by ensuring that development is accessible by public transport for those without access to a car.'*
- 3.14. Technical Advice Note 23 (February 2014) (TAN 23) relates to economic development, a term that the document defines to include retail uses. Paragraph 1.2.1 confirms that it is essential that the planning system gives due weight to the economic benefits associated with development proposals.
- 3.15. Technical Advice Note 24 (October 2017) (TAN 24) covers the historic environment. Paragraph 1.25 states that the setting of an historic asset includes the surroundings in which it is understood, experienced and appreciated, embracing present and past relationships to the surrounding landscape. Its extent is not fixed and may change as the asset and its surroundings evolve. Paragraph 1.8 notes that changes in the historic environment are inevitable as a result of decay caused by natural processes, damage caused by wear and tear of use and the need to respond to social, cultural, economic and
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technological changes.

Development Plan Policy

Wrexham Unitary Development Plan

- 3.16. Wrexham Unitary Development Plan (UDP) was adopted on 14th February 2005, with the saved policies continuing to form the basis on development management decisions.
- 3.17. Policy PS1 states that new development for housing, employment and community services will be directed to within defined settlement limits/employment areas.
- 3.18. Policy PS2 relates to the impact of development and states that it must not '*materially detrimentally affect countryside, landscape/townscape character, open space, or the quality of the natural environment*'.
- 3.19. Policy PS3 supports the re-use of brownfield land in preference to the use of greenfield land.
- 3.20. Policy PS4 encourages new development to maintain the existing settlement pattern and character, whilst also integrating with the existing transport network to help reduce the overall need to travel and encourage the use of alternatives to the car.
- 3.21. Policy GDP1 identifies a range of principles that new development will be expected to achieve, to include ensuring that new development:
 - reflects the character of the area and makes a positive contribution towards the appearance of the locality; and
 - can be safely and conveniently access by pedestrians and by vehicles.
- 3.22. Policy EC4 relates to trees and hedgerows and their retention along with other natural and water features. New planting will be encouraged to enhance the development. Development which results in the loss or significant damage to valuable trees, important hedgerows or ancient woodland sites will not be permitted.
- 3.23. Policy EC13 refers to surface water run-off and states that '*Development which would result in an unacceptable adverse impact on the water environment due to additional surface water run-off will not be permitted*'.
- 3.24. Policy S4 relates to large-scale retail development and states that such development should be located within the Shopping Area of Wrexham Town Centre and within District Shopping Centres and where possible development should use vacant, underused or derelict land, or buildings suitable for conversion. The policy accepts that there may be a need for the development but no sites available in Town or District Centres and, in such cases, a sequential approach to site selection will be taken. This approach will favour the re-use of land and buildings where possible, and sites that are accessible by a choice of transport modes.
- 3.25. Policy T8 covers parking requirements. Parking within developments should be in line with the Council's current parking standards. When considering the provision regard will be given to the availability of public transport nearby; proximity to public car parking; proximity to local services and facilities; road safety hazards and amenity considerations arising from on-street parking in the vicinity of the site.

Local Development Plan

- 3.26. The Council is currently undertaking consultation on the Deposit Draft Wrexham Local Development Plan (LDP). As the LDP is at a very early stage of its development and has not
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been the subject of Examination, no weight can currently be attached to the draft policies when making development management decisions.

Wrexham Town Centre Masterplan (Adopted April 2016)

- 3.27. This document has been adopted by the Council as an evidence base for the Local Development Plan and a framework for decision making within the Masterplan area. In brief it sets out a vision for the town centre as attractive, distinctive and accessible where people want to live, learn, work, visit and invest.

Local Planning Guidance Notes

- 3.28. The purpose of the Local Planning Guidance Notes (LPGN) are to amplify national and local planning policies and community strategy objectives:
- LPGN 6 – Access to and Use of Buildings: Ensuring that all new development is accessible to all.
 - LPGN 7 – Landscaping and Development: Outlines the level of detail required with different types of application, and how implementation and maintenance will be managed.
 - LPGN 9 – Hot Food Take-Aways: This note is part of a broader Healthy Eating and Being More Active Strategy to tackle obesity in the County Borough and focuses on hot food takeaways with regard to appropriate location and concentration, highway safety, general amenity and community health issues.
 - LPGN 15 – Cycling: To encourage a greater number of journeys to be made by bicycle, this note sets out how developers will be expected to provide facilities for cyclists in the preparation of relevant development schemes.
 - LPGN 16 – Parking Standards: Explains the parking standards the Council applies to new development.
 - LPGN17 – Trees and Development: Amplifies UDP Policy EC4 regarding tree protection and highlights the benefits of trees as integral to the design of development.
 - LPGN 31 – The Welsh Language and Welsh Communities: Provides guidance on how the Council will assess the likely future impact of relevant developments, individually or cumulatively, on the wellbeing of the Welsh language and Welsh communities.
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4. Planning Statement

- 4.1. The merits of the proposed development are assessed below in accordance with the requirements of the relevant planning policies and guidance identified in the previous section.

Principle of the Proposed Development

- 4.2. The application site is located within the defined settlement limits of Wrexham and comprises brownfield, previously developed land. The site is also located within the boundary of Wrexham Town Centre Masterplan, which identifies the site for comprehensive redevelopment. The accompanying Transport Assessment demonstrates how the site is accessible by a choice of means of travel.
- 4.3. The principle of delivering new development of any kind on this site, therefore, accords with the requirements of policy, with the application site representing a sustainable, accessible location.
- 4.4. In terms of the acceptability of the proposed uses, the principle of delivering a new Lidl store accords with policy subject to satisfying the retail policy tests. This assessment is presented in the Retail Statement sections of this Statement, with the conclusion being drawn that there is a clear need for the proposed foodstore, that there are no suitable and available alternatives sites to accommodate the proposals that are located within or closer to the Principal Shopping Streets, and that the proposal will not have a significant impact on Wrexham Town Centre. The principle of delivering the proposed Lidl store on this site is, therefore, acceptable,
- 4.5. With regard to the proposed drive-through coffee shop, LPGN9 has regard to hot food take-away proposals and seeks to discourage such development within 400m from a school. Alexandra Community Primary School is located within this distance, across Powell Road from the application site.
- 4.6. Whilst LPGN9 would automatically seek to resist the principle of a hot food takeaway being delivered on the application site, the proposed drive-through coffee shop does not comprise a hot food take-away.
- 4.7. As detailed at Section 2, the primary use of the proposal will be the sale of hot drinks for consumption both on and off the premises. The sale of drinks for consumption off the premises (Class A1) is likely to be broadly even to the sale of drinks for consumption on the premises (Class A3), hence the mixed use classification. The drive-through function is considered ancillary to the function of selling drinks for consumption of the premises. The proposal does not, therefore, comprise a Class A5 hot food takeaway and this can be controlled by planning condition.
- 4.8. Notwithstanding this, pupils at Alexandra Community Primary School are aged between 3 and 11 years old. It is typical for pupils within this age range to be escorted to and from school and to be prohibited from leaving the school grounds at lunchtime. It is, therefore, considered to be highly unlikely for pupils of the school to visit the proposed drive-through coffee shop without the presence of an adult.
- 4.9. This conclusion is corroborated by the Planning Inspectorate with regard to proposals to convert a shop in Acrefair to a hot food takeaway (APP/H6955/A/12/2183661), with the Inspector concluding the following:

'In my experience the majority of primary-age pupils travel to and from school in the

company of an adult and do not leave school at lunch-time’.

- 4.10. The Inspector allowed the appeal, resolving that a new hot food takeaway close to a primary school was unlikely to lead to a considerable increase in the number or frequency of children consuming fast foods.
- 4.11. Furthermore, it is, nevertheless, the case that there are other uses in the immediate area, such as the Asda superstore located immediately next to the school, that offer a far more extensive range and choice of cheap, energy rich and nutrient poor foods and drinks (in addition to healthier eating options), and which are more accessible on foot from the school (i.e. they do not require a dual carriageway to be crossed), when compared to the application site. Accordingly, the proposed drive-through coffee shop is unlikely to represent a significant attraction to primary school children.
- 4.12. It is, therefore, concluded that the principle of redeveloping the application site fully accords with policy, with the proposed land uses also being appropriate to this location.

Design and Layout

- 4.13. The proposed development has been laid out to ensure that the proposed buildings make a positive contribution to the character and appearance of the area when viewed from Powell Road and Bodhyfryd, which is a key route around Wrexham Town Centre.
- 4.14. Accordingly, the buildings will be set back from the road frontage so they do not overly dominate views, to include views of the neighbouring Grade II Listed former Grove Park school. The Lidl store has also been orientated to ensure that the glazed shop frontage faces Bodhyfryd, to maximise the quality of the appearance of the building.
- 4.15. The building has, however, been positioned along the southern site boundary to ensure that any impact on existing mature trees is minimised, with the proposal seeking to deliver a pleasant, tree-lined pedestrian link running between the store and Wrexham Memorial Hall with further linkages beyond.
- 4.16. Other layout options have been explored, to include orientating the Lidl store to face towards the public footpath on the western site boundary. However, such an arrangement was found to raise a number of residential amenity and functional issues, in addition to placing the delivery area in a highly visible position within the site.
- 4.17. As detailed in the accompanying Design and Access Statement, the design and layout of the proposal will make a positive contribution towards the character and appearance of the locality.

Trees

- 4.18. The development proposals have evolved with reference to the requirements of Policy EC4 and the Trees and Development LPGN.
 - 4.19. The accompanying Arboricultural Report provides a survey of the existing trees on and adjoining the application site. The survey identifies the following categories of trees:
 - Category A = 2 trees
 - Category B = 22 trees
 - Category C = 11 trees
 - Category U = 2 trees
 - 4.20. The development proposals will require the removal of the 22 trees in total, with one being
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a Category A tree and 11 being Category B trees.

It should be noted that T18, the Category A tree, is proposed for removal in accordance with the Ministry of Justice's proposals to erect a 2-storey custody suite adjacent to the application site, with the proposed building located within the root area of T18 (application reference P/2017/1045). Accordingly, whilst T18 is located within the application site, it will be lost as a result of neighbouring development.

- 4.21. The loss of 11 Category B trees to the proposed development is unavoidable due to the need to change ground levels across the site and the need to excavate within their root areas. However, replacement planting is proposed with the proposed landscaping scheme providing 13 replacement trees in suitable locations around the application site. In particular, it is proposed to consolidate and enhance the tree lines southern site boundary to Bodhyfryd to create a high quality east-west pedestrian linkage through the application site.
- 4.22. The Arboricultural Report also provides guidance on the protection of existing trees during the construction phase, which can be secured by planning condition.
- 4.23. Overall, the proposal seeks to minimise its impact on existing trees, with appropriate new planting proposed to mitigate the trees that are required to be removed in order to accommodate the proposed development, thereby ensuring that the sylvan character along Bodhyfryd on the southern site boundary is maintained and enhanced.

Residential Amenity

- 4.24. The application site has few direct residential neighbours, with the closest dwellings comprising no.8 Powell Road located to the west of the application site and no.16 Park Avenue, which presents its side elevation to Powell Road opposite the application site.
 - 4.25. The application site has been laid out to ensure that the main areas of activity associated with the operation of the proposed development, such as the Lidl store entrance and trolley bay, are positioned as far as possible from no.8 Powell Road. Further, no parking spaces are proposed perpendicular to no.8 Powell Road in order to minimise the potential for car headlights to shine onto the property. Hard and soft landscaping, including tree planting and fencing, is also proposed along the western site boundary in order to mitigate impact on residential amenity. Accordingly, opportunities are proposed that will serve to minimise the impact of the proposal on its neighbours.
 - 4.26. The proposed layout does, however, result in the store's delivery area being located on the west elevation of the building. The store will typically receive no more than two HGV deliveries per day, which will be managed directly by the Applicant. The delivery vehicle will reverse onto a delivery dock where a seal is formed between the trailer and the building. Goods are then simply rolled on trolleys from the trailer into the store, with the process typically taking 45 minutes. A plant compound will also be located adjacent to the delivery dock.
 - 4.27. The planning application is accompanied by a noise impact assessment that provides an assessment of the noise generated by delivery activities, general activity within the car park and the operation of plant. The assessment concludes that noise generated by plant and general activity generated by the proposal during daytime hours (0700 to 2300 hours) falls within acceptable limits. However, the report advises that acoustic screening is required to protect residential amenity during the daytime from noise generated by delivery movements and to mitigate plant noise overnight. Appropriate screening is, therefore, proposed and can be secured by planning condition.
 - 4.28. The report advises that deliveries to the store should be prohibited during the night time (2300 to 0700 hours), which can be controlled by condition.
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- 4.29. Furthermore, it is proposed that the Lidl store be permitted to open between the hours of 07:00 to 22:00 Monday to Saturday and for a six hour period between 10:00 and 18:00 on Sundays. The store will, therefore, trade (and attract customers) during the day-time only and not overnight. These opening hours can be controlled by planning condition.
- 4.30. With regard to lighting, all internal and external lighting at the site will be controlled by the store's Building Management System, with all external lighting will be controlled by timers and remote sensors. The timers ensure that the lighting can only come on during certain times of the day, with the remote sensors ensuring that lights only turn on when natural day light falls below a pre-set limit.
- 4.31. The Building Management System will permit all external lighting to switch on one hour before store opening (to assist the arrival of staff) and switch off one hour after store closing (to assist staff departures). However, such lighting will only actually automatically switch on if natural light levels are sufficiently low.
- 4.32. Accordingly, the proposed external lighting will not be continuously switched on overnight and will only be switch on during the day time if natural light levels fall below the pre-set sensor limit. This system will serve to minimise the amount of time that the lights are switched on and will ensure that the amenity of neighbours is not impacted upon overnight. Further, the details of the external lighting scheme can be agreed by way of a planning condition, with the proposed scheme being designed to minimise light spillage on to neighbouring land.
- 4.33. Whilst the proposed drive-through coffee shop is expected to open no longer than 0600 and 1100 daily, the building is located further away from any residential neighbours. As no cooking will take place on the premises, the use will not require any kitchen extraction equipment and will not disperse fumes or odours externally. This element of the proposal is not expected to result any adverse impacts on residential amenity.
- 4.34. The proposal as a whole is considered to be fully compatible with its neighbours, with appropriate mitigation proposed to ensure that the very limited amenity impacts can be reduced and/or controlled by planning condition.

Parking and Access

- 4.35. The Transport Assessment demonstrates that vehicle movements associated with the proposed development can be satisfactorily accommodated on the local highway network without any unacceptable impacts, with the site also being accessible by a choice of modes of transport, including walking and cycling.
- 4.36. The proposed development as a whole will deliver 151 parking spaces, which equates to a rate of provision of 1 parking space per 15.3m² gross floorspace. This rate of provision falls marginally below the Council's maximum parking standard of 1 space per 14m² gross floorspace for Class A1 retail uses. In light of the accessibility of the site by non-car modes of travel, the proposed level of parking provision is considered appropriate.

Sustainability

- 4.37. Lidl is firmly committed to delivering a modern, energy efficient and operationally efficient building. Accordingly, the proposed store seeks to maximise opportunities to reduce energy consumption, use energy efficient materials and equipment and enhance operational efficiency in addition to qualitatively enhancing the shopping environment.
- 4.38. A key feature of the new store will be its eastern elevation, which will have are large area of glazing in order to allow daylight to illuminate the shop floor and enhance the shopping environment, whilst also reducing energy consumption on internal lighting. This proposed design will also enhance the appearance of the store and will create animation and provide natural surveillance over the store car park.
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- 4.39. All internal and external lighting will be remotely operated using sensors, with lights turning on when someone approaches the sensor and off after a set period of inactivity. The lighting on the sales floor will reduce to one third of the normal level outside trading hours and will be turned off at the end of the day.
- 4.40. Lidl stores use modern materials and sustainable construction techniques which help reduce construction time and building waste. For example, the store will be clad in a rainscreen composite panel, which are fully weather resistant and require no maintenance. The panels also offer excellent thermal insulation and low thermal transmission properties, thereby saving on heating and cooling costs, and are fully recyclable or re-usable. The use of this product also contributes to a faster build time.
- 4.41. It is the case that Lidl strive to specify highly energy efficient plant and equipment, to include condensing boilers, condensers and refrigeration equipment. For example, all refrigeration equipment will have a Class A energy rating. Furthermore, water efficient fixtures and fittings will be installed, such as aerated/low flow taps and dual flush WCs.
- 4.42. Environmental Best Practice is a core consideration in every aspect of the business, with the Company choosing to deal with contractors, suppliers and organisations that share the same ideals. For example, the refrigeration plant boasts low carbon emission ratings and operates without the need for CFC's meaning less harm to the environment. As a result of this commitment, Lidl is one of the first retailers in the UK to fully replace the refrigerant in all stores with a more environmentally friendly option that has zero ozone depletion potential. The proposed store will take a step further by utilising propane as a natural refrigerant, which has no negative effects on the environment.
- 4.43. Lidl pioneered the reuse of plastic shopping bags and has been encouraging customers to re-use bags since the company entered the UK market in 1994.
- 4.44. Lidl has an extensive recycling policy. All recyclable waste is separated into its constituent parts in-store, with cardboard then being compressed into bales up to 400% of the original volume and plastics separated and bagged. The waste materials are then returned on a daily basis to the Regional Distribution Centres on the returning delivery vehicle alongside any other store returns, such as stock transfers, pallets, bread crates and milk trolleys. On the whole, approximately 90% of waste is diverted away from landfill sites.
- 4.45. To further reduce waste, Lidl closely works with suppliers to help develop innovative packaging solutions that eliminate as much of the unnecessary raw materials as possible.
- 4.46. The proposed store will typically receive two deliveries per day, which will be sourced from the regional distribution hub in Runcorn. The transportation of goods is handled by Lidl's pan-European distribution centres in order to maximise vehicle capacity to ensure the minimum amount of haulage is required. The delivery structure enables Lidl to guarantee the best possible freshness, even of perishable items, as well as allowing the organisation of transportation in the most efficient and environmentally friendly way.
- 4.47. Overall, the replacement store building is expected to achieve a Class A Energy Performance Certificate rating, with the proposals also achieving many BREEAM credits.

Conclusion

- 4.48. The proposal has been comprehensively assessed against the requirements of planning policy. It has been demonstrated that the principle of redeveloping the application site is acceptable, with the proposal also satisfying the technical requirements of applicable policies. Where there is potential for issues to arise as a result of development, the Applicant proposes appropriate mitigation to ensure that, as a whole, the development proposal fully satisfies the requirements of policy.
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5. Heritage Statement

- 5.1. The proposed development is assessed below in accordance with the requirements of PPW.

Heritage Assets

- 5.2. The Archwilio Historic Environment Records for Wales identifies the former Grove Park School, located on the east sides of Chester Road, north of its junction with Powell Road, as a Grade II Listed Building. With regard to the exterior of the building, the listing description states:

'The building broadly conforms to a neo-classical tradition but in a 1930s interpretation and has some elements which are reminiscent of art deco. It is constructed of brushed brick with panels of herringbone and geometric arrangements. The main west facing entrance range is a wide 15 bay symmetrical façade with hipped advanced end bays and an advanced central entrance of stone or artificial stone. A dedication stone next to the entrance doors was laid by William Jones JP, Chairman of the Governors June 1938. Three wings project backwards, a central hall wing and on the outside two mirrored classroom wings. Quadrangles and cloistered walkways fill the spaces between the wings'.

- 5.3. The Records also identify the Royal Welch Fusiliers Memorial located at the junction of Chester Road and Bodhyfryd as being a Grade II Listed Building. The listing description confirms that the Memorial was originally erected in 1924 on a different site but was relocated to the junction of Chester Road with Bodhyfryd after the Second World War. The building is described as:

'Central pedestal surmounted by figures in the C18 and C20 uniforms of the Royal Welch Fusiliers. Inscription commemorating the dead of the First World War on the pedestal, which is flanked by low quadrant walls which carry Second World War inscriptions, and have laurel-band cornice and raking copings. Walls terminate in stepped piers with segmental caps, and low relief emblems. The quadrant walls enclose a cobbled surface raised up steps'.

- 5.4. There are no other Listed Buildings or other heritage assets in the immediate area and the site is not located within a Conservation Area.

Impact on Heritage Assets

- 5.5. As a nearby development, policy requires the proposed development to not harm the setting of the Listed Building.
- 5.6. With regard to the former Grove Park School, the proposed development is located approximately 70m to the south east of the Listed Building, across Powell Road (a dual carriageway). The closest part of the Listed Building to the application site will comprise the eastern end of the southern classroom wing that runs parallel to Powell Road.
- 5.7. As detailed in the listing description, the main entrance and façade of the Listed Building face west towards Chester Road. The proposed development will not be visible in any views of this main frontage and, therefore can have no impact on this aspect of the setting of the Listed Building.
- 5.8. Similarly, the proposed development will not be visible and will have no impact on the setting of the quadrangles and cloistered walkways located between the rear wings.
- 5.9. The proposed development will only be seen in the same context as the Listed Building
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when viewed from the east/south east, primarily from Bodhyfryd. Such views currently comprise the brutalist appearance of the existing Police Station building, to include the multi-storey tower block and communications masts on the roof as illustrated below.



- 5.10. The proposed buildings will be significantly lower in height and mass when compared to the Police Station building and will more appropriately complement the height of the Listed Building and all other buildings within the immediate area which are typically no more than 2-storeys in height. The proposal will, therefore, sit well within the local streetscape.
- 5.11. The proposed buildings will adopt a modern and contemporary form. The Lidl store will present its main shop frontage towards the east, thereby ensuring that it presents a high quality, animated and attractive frontage to views from the east/south east alongside views of the Listed Building.
- 5.12. The foodstore will be finished in a palette of colours that are sympathetic to the Listed Building, with Lidl moving away from the yellow and blue corporate identity to a more under-stated and sophisticated slate grey and complementary cladding panels.
- 5.13. Overall, the proposed development is expected to enhance the setting of the former Grove Park School Listed Building when compared to the contribution made by the existing buildings located within the application site.
- 5.14. With regard to the Royal Welch Fusiliers Memorial, this commemorative structure is located 100m south west of the proposed Lidl store. The memorial is set within a landscaped setting characterised by multiple mature trees and turfed soft landscaping. These landscape features obscure views of the application site when viewed from the vicinity of the Memorial.
- 5.15. The proposed development seeks to retain as many existing mature trees within the application site as possible. The majority of the existing trees on the southern site boundary will be retained with new tree planting proposed on the south west corner of the application site. The proposal will, therefore, maintain the existing sylvan character and setting of the Memorial.

Conclusion

- 5.16. The proposal will not bring about an unacceptable impact on any heritage asset. Indeed, the setting of the former Grove Park School will be preserved and enhanced by the removal of the existing overbearing and visually dominant Police Station building and the redevelopment of the site in a complementary and appropriate manner. The proposed tree retention and landscaping scheme will also preserve the setting of the Royal Welch Fusiliers Memorial. Accordingly, the proposal is fully compliant with the relevant policy tests.

6. Retail Statement: Need

- 6.1. As the application site is located on the edge of Wrexham Town Centre, PPW and TAN4 require the need for the proposed retail floorspace be demonstrated.

Quantitative Need

- 6.2. The Council commissioned PBA to prepare a retail assessment to form part of the evidence base to support the preparation of the Local Development Plan, with Wrexham Retail Assessment being issued in July 2014. The Assessment provided a global indication of the quantitative need/capacity to support new convenience retail floorspace.
- 6.3. Tables 9a to 9c at Appendix C of the Assessment present the conclusions of the assessment of capacity in accordance with adjustments to the assumptions made, which results in a range of output figures. The following table identifies the residual convenience goods capacity that is identified to support new development after having made deductions for committed developments.

Year	Minimum Capacity	Maximum Capacity
2014-2018	£38.98m	£40.72m
2018-2023	£15.02m	£16.97m
2023-2028	£18.70m	£21.21m

- 6.4. It is, therefore, apparent that Wrexham Retail Assessment identifies a significant quantitative need for additional convenience retail floorspace within the study area over and above that previously committed/approved. The focus for delivery of this additional floorspace should be Wrexham Town Centre.
- 6.5. The Assessment also identifies significant capacity to support the delivery of additional comparison retail floorspace, particularly within the period 2018-2023 (£35.99m to £38.53m) and beyond (Tables 7a to 7c).
- 6.6. The proposed Lidl store will have a sales area of 1,325m², of which up to 80% of floorspace (1,060m²) will be used for the sale of convenience goods and 20% (265m²) for the sale of comparison goods. Applying Lidl's company average sales density (Retail Rankings) to these floorspace figures, the proposed store can be expected to achieve a convenience goods turnover of approximately £8.6m and a comparison goods turnover of approximately £2.1m.
- 6.7. The level of capacity identified by Wrexham Retail Assessment to support new retail floorspace between the period 2018 to 2023 is more than sufficient to support the turnover of the proposed Lidl store. There is, therefore, a quantitative need for the proposed development, especially if all of the identified 2014-2018 capacity has not been taken up.
- 6.8. As a sensitivity test to consider capacity within Wrexham only (and not across the whole study area), it is noted that the Retail Assessment identifies several existing foodstores in Wrexham as over-trading, with Table 6.6 on page 55 of the Assessment identifying the Wrexham supermarket offer as over-trading by approximately £75m in 2014. Whilst a number of planning approvals have been granted that may serve to reduce this level of over-trading, it is inevitable that a number of existing stores will continue to over-trade by a

significant margin.

- 6.9. The proposed Lidl store will be well placed to help reduce over-trading at existing stores, being located opposite Asda on Holt Road (identified to be overtrading by £30.4m) and close to, and a direct competitor of, the Aldi store at Plas Coch Retail Park (over-trading by £24m).
- 6.10. Whilst it is acknowledged that the new Aldi store on Ruthin Road may have already reduced the level of over-trading at the Plas Coch store, Aldi has itself advised that over-trading was only expected to reduce by £4.5m (Planning Statement submitted in support of P/2015/0533). The residual level of over-trading at the Plas Coch store exceeds the turnover of the proposed Lidl store.
- 6.11. It can, therefore, be concluded that robust evidence demonstrates a clear and immediate quantitative need for the proposed Lidl foodstore.

Qualitative Need

- 6.12. Wrexham Town Centre Master Plan, which was adopted in 2016, forms part of the Local Development Plan evidence base and seeks to assist the taking of development management decisions. The application site is located within the master plan area.
- 6.13. The Master Plan acknowledges a need for additional food shopping in Wrexham (paragraph 3.1.13) with the Bodhyfryd area identified as an opportunity site that has potential to deliver additional retail floorspace and other main town centre uses.
- 6.14. As stated above, Wrexham Retail Assessment identifies several existing foodstores in Wrexham as over-trading, some by significant margins. This performance indicates that the existing offer does not provide sufficient choice, with the number of customers seeking to meet their food shopping needs at certain stores being well above average.
- 6.15. There is, therefore, a qualitative need to enhance the convenience food offer in Wrexham by widening the choice and diversity of the supermarket offer and, specifically, delivering new stores that will represent an attractive alternative for customers at those that are over-trading. The proposed Lidl store is well-placed to achieve this.
- 6.16. The proposed development will deliver a modern store format. The store will have a high quality internal environment, creating a pleasant and more attractive shopping environment that will be well lit, spacious and efficient.
- 6.17. Customers will be able to undertake a full shop quickly and efficiently, with the store layout having evolved following extensive monitoring of product placement and internal layouts. Furthermore, the store will be operationally efficient, meaning that staff are better able to manage stock and deliver a high quality customer service.
- 6.18. The proposal will diversify the range and choice of goods available to local people, meaning that they have a choice not to continue shopping at busy and congested stores nearby.

Conclusion

- 6.19. A clear quantitative and qualitative need for the proposed Lidl store has been demonstrated, which will enhance choice and competition for the benefit of local consumers.
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7. Retail Statement: Sequential Approach

- 7.1. PPW and UDP Policy S4 require the selection of sites for new development for all main town centre uses to proceed via a sequential approach. In short, first preference should be for town centre sites, followed by edge-of-centre sites and then well connected out-of-centre sites where there are no suitable, available and viable sites within more sequentially preferable locations. Developers and retailers are required to adopt a flexible approach towards assessing town centre options.

Area of Search

- 7.2. An area of search has been defined by a 5 minute off-peak drive time from the application site, which is illustrated on a plan at **Appendix 1**. The area of search is shown to comprise the urban area of Wrexham.
- 7.3. This definition of the area of search in this manner is widely supported for foodstores of the nature and scale proposed.

Flexibility

- 7.4. The site search exercise has initially sought to identify all reasonable opportunities that are available to accommodate a retail use in principle. These opportunities have then been considered in further detail, with the level of detail depending upon the ability of the opportunity to accommodate the proposed Lidl store and its associated parking and servicing requirements. A highly flexible approach has, therefore, been adopted in order to identify potential opportunities, which is evident from the Site Assessment presented below.

Site Assessment

- 7.5. A survey of the town centres within the Area of Search and the surrounding areas was undertaken in June 2018 the findings of which are presented below.

Principal Shopping Streets, Wrexham Town Centre

- 7.6. A survey of the Principal Shopping Streets in Wrexham Town Centre has identified a number of **units that are available for re-occupation**, to include the following:

Location	Ground Floor Area	Location	Ground Floor Area
1-2 Hope Street	202m ²	2 Queen Street	214m ²
11 Hope Street	118m ²	6 Queen Street	117m ²
13-16 Hope Street	1,728m ²	21 Queen Street	60m ²
17 Hope Street	75m ²	24 Queen Street	67m ²
20-21 Hope Street	116m ²	4-6 Regent Street	276m ²
23-24 Hope Street	277m ²	21 Regent Street	126m ²
28-29 Hope Street	549m ²	23 Regent Street	129m ²

39 Hope Street	117m ²	17 Lord Street	64m ²
42-43 Hope Street	84m ²	21 Lord Street	55m ²
46-47 Hope Street	116m ²	7-9 Rhosddu Road	254m ²

- 7.7. With the exception of 13-16 Hope Street, which is reviewed individually below, it is evident that all of the available retail accommodation within the Principal Shopping Streets is of an insufficient scale to accommodate the proposed retail floorspace, even when generously allowing for flexibility.
- 7.8. Furthermore, there are no opportunities to combine two or more available units into a larger opportunity that could be of a scale comparable to the proposed development.
- 7.9. The **former Marks and Spencer store at 13-16 Hope Street** offers 1,728m² gross ground floor accommodation with a further 1,589m² gross at first and second floor level. Therefore, with 3,316m² gross floorspace in total, the former Marks and Spencer store exceeds the scale of the proposed development.
- 7.10. However, the former Marks and Spencer store is not suitable to accommodate the proposed development, even when allowing for an appropriate degree of flexibility.
- 7.11. Whilst the scale of the building exceeds the quantum of retail floorspace proposed, the former Marks and Spencer unit does not offer any dedicated off-street customer parking facilities. The nearest car parks are located approximately 300m away at Island Green Retail Park, St Giles Way and the Market Street area and all are owned by third parties and operate on a Pay and Display basis. The Applicant is unable to rely upon distant public parking facilities located some distance from the site to meet the parking needs generated by the proposed development.
- 7.12. Furthermore, it would be highly impractical for the Applicant to manage the use of shopping trolleys across the whole town centre as customers are highly unlikely to return their trolley to the store once they have packed their shopping in their car.
- 7.13. Notwithstanding this, the servicing arrangement at the former Marks and Spencer store are inadequate to serve the proposed development. Access to the service area on Abbot Street is constrained and requires a very narrow 90° bend from Town Hill to Abbott Street to be negotiated. It is highly unlikely that a standard articulated Lidl delivery vehicle could safely access the delivery area off Abbot Street.
- 7.14. Further, the delivery arrangement requires vehicles to reverse from the public highway onto the loading docks, which is a dangerous manoeuvre. The existing delivery docks also do not have sufficient depth to accommodate a HGV, so a large part of the vehicle would be required to stand in, and block, the highway. Such an arrangement would be wholly unacceptable to the Applicant and is highly unlikely to be supported by the local highway authority.
- 7.15. It is concluded that the former Marks and Spencer store is not suitable to accommodate the proposed development, even when allowing for a reasonable degree of flexibility.
- 7.16. The survey of the Principal Shopping Streets did not identify any potential development sites or other opportunities that had any potential to accommodate the proposed development.
- 7.17. Overall, it is demonstrated that none of the vacant/available shops and premises located within the Principal Shopping Streets in Wrexham Town Centre are suitable and available to accommodate the proposed development.
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Shopping Area, Wrexham Town Centre

- 7.18. Elsewhere within the defined Shopping Area of Wrexham Town Centre, a small number of additional units have been identified as being available, to include:

Location	Ground Floor Area	Location	Ground Floor Area
Unit 12, Island Green Shopping Centre	981m ²	10 Hill Street	68m ²
40-42 High Street	192m ²		

- 7.19. The units on High Street and Hill Street are clearly of an insufficient scale to accommodate the proposed development. However, **Unit 12 in Island Green Shopping Centre** offers 981m² gross at ground floor level with a further 1,238m² gross at first floor (2,218m² gross in total), which is similar to the scale of the proposed development and, therefore, warrants further consideration.
- 7.20. The ground floor area of Unit 12 equates to 74% of the sales area and 46% of the gross floor area of the proposed Lidl store. Quite clearly, if Lidl were to occupy Unit 12, significant compromises would need to be made in terms of either reducing the scale of the proposed development by 54% or delivering sales floorspace and storage and ancillary floorspace at first floor level.
- 7.21. However, whilst a small number of Lidl stores have staff accommodation at first floor level, none have the sales floorspace delivered over two or more sales floors. Indeed, the Planning Inspectorate has recognised that there are limits to the flexibility of the discount food retail operation, as summarised below:
- At Newhaven (APP/P1425/V/03/1132932), the Inspectorate accepted that *'the applicant [Lidl] has a particular operating style which limits the degree of flexibility that can be employed within the site selection process. The operation cannot be run in a style that ignores the economics that underlie a deep discounting operation. I consider that in relation to site selection, Lidl has adopted a realistic response to the constraints and opportunities of the sector within which the company seeks to operate'* (paragraph 11.17); and
 - In Merton (APP/T5720/V/04/1171394), the Inspectorate had regard to the need for Lidl to adhere to a particular format, principally based upon a single level store, so as to allow the efficient movement of pallet loads of goods from the delivery bay to the sales area. It was accepted that a more labour intensive arrangement would not only increase the storage required (as goods cannot be transferred to the shop floor as quickly) but also increase costs (more staff required and specially designed displays needed), undermining the ability to sell goods at low prices.
- 7.22. Taking account of these limits to flexibility, Lidl would be forced to deliver all of the sales floorspace and a reasonable level of storage space at ground floor level within Unit 12. However, this would result in the sales floorspace being significantly below the 1,325m² proposed and also below the 981m² ground floor area. The resultant store would not be capable of offering the full range of goods and, therefore, would not be a viable investment.
- 7.23. It would be beyond the requirements of the sequential test to require the proposed development to be so reduced in scale and compromised to that it is made to fit into Unit 12.
- 7.24. Notwithstanding the above, there are a limited number of customer parking spaces located
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close to Unit 12 and several shops who's customers will seek to compete for these spaces. It is, therefore, highly likely that Lidl customers would frequently be unable to park close to Unit 12 and would find themselves having to push a shopping trolley some distance (and return it to the trolley bay) and through a busy car park environment that offers a circuitous route to the main body of the car park.

- 7.25. Further, the car park is in the control of a third party and is subject to parking charges. It would not be acceptable to the Applicant for a store to rely upon such a car park arrangement.
- 7.26. It is concluded that Unit 12 in Island Green Shopping Centre is not suitable to accommodate the proposed development, even when allowing for a reasonable degree of flexibility.
- 7.27. A physical survey of the Shopping Area was unable to identify any potential development sites or other opportunities that had any potential to accommodate the proposed development.
- 7.28. Therefore, it is concluded that there are no suitable and available opportunities within Wrexham Town Centre's defined Shopping Area to accommodate the proposed development.

Edge-of-Centre Opportunities

- 7.29. The application site is located approximately 320m walking distance from the closest Principal Shopping Street and 250m walking distance from the closest edge of the Shopping Area in Wrexham Town Centre. Accordingly, it is appropriate to consider whether the proposed development could be delivered closer to the town centre on a site that has greater potential to form linkages with the town centre.
 - 7.30. The following units within Eagles Meadow Shopping Centre, which occupies an edge-of-centre location, have been identified as available:
 - a) Unit A3 – 102m² gross;
 - b) Unit C1 – 123m² gross;
 - c) Unit C8 – 167m² gross;
 - d) Unit D4/5 – 95m² gross; and
 - e) Unit D16 – 194m² gross.
 - 7.31. None of the above units are of sufficient scale to accommodate the proposed development and, therefore, they are unsuitable.
 - 7.32. The town centre survey has identified a **potential development site on St. Giles Way**, which extends to approximately 1.04ha and has frontage to Bridge Street and St. Giles Way. The site formerly accommodated a brewery, but has been cleared of all built development and currently comprises an area of un-used, overgrown previously-developed land.
 - 7.33. In July 2004, the Council adopted a Planning Development Brief to guide the redevelopment of the site and surrounding area. The Brief states that residential development should be the predominant land use, with a mix of uses comprising residential and Class A1 and A3 uses on the Bridge Street frontage.
 - 7.34. More recently, the Master Plan for Wrexham Town Centre identifies this site as a key site for redevelopment, with residential, small scale local retail, office, community facility and leisure uses promoted. The Master Plan suggests that pubs, restaurants and a hotel could form part of the mix of uses, but that residential uses will be expected to form the major
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component.

- 7.35. It is apparent that a discount foodstore and drive-through coffee shop proposal does not align with the Council's long-held aspirations for a residential-led redevelopment of this site. It is, therefore, unlikely that the Council, as landowner, would make the site available to accommodate the proposed development.
- 7.36. It is noted that the Town Centre Masterplan indicates that convenience retail development may be an appropriate use on the application site. Accordingly, the Masterplan would appear to favour the delivery of the proposed development on the application site rather than the site on St. Giles Way.
- 7.37. It is, therefore, concluded that the St. Giles Way development opportunity is not suitable and may not be available to accommodate the proposed development.
- 7.38. No other potential edge-of-centre development opportunities that have potential to accommodate the proposed development have been identified.

Material Considerations

- 7.39. It is material that the Local Planning Authority granted planning consent for an out-of-centre discount foodstore of 1,742m² gross and 149 parking spaces on a site on Ruthin Road in December 2015 (ref: P/2015/0533). In granting consent, the Council accepted that large vacant units within Wrexham Town Centre's Shopping Area and the development opportunity on St. Giles Way, amongst others, were not suitable and available to deliver a discount foodstore. This situation has not changed in the context of the proposed development and the assessment presented above.

Conclusion

- 7.40. It has been demonstrated that there are no suitable and available opportunities within the Principal Shopping Streets or the Shopping Area as a whole in Wrexham Town Centre to accommodate the proposed development, even when allowing for an appropriate degree of flexibility.
 - 7.41. Furthermore, there are no alternative edge-of-centre opportunities that are suitable and available to accommodate the proposal and which have greater potential to form connections with the Shopping Area when compared to the application site. Accordingly, the application site is the sequentially preferable location to deliver the proposed development.
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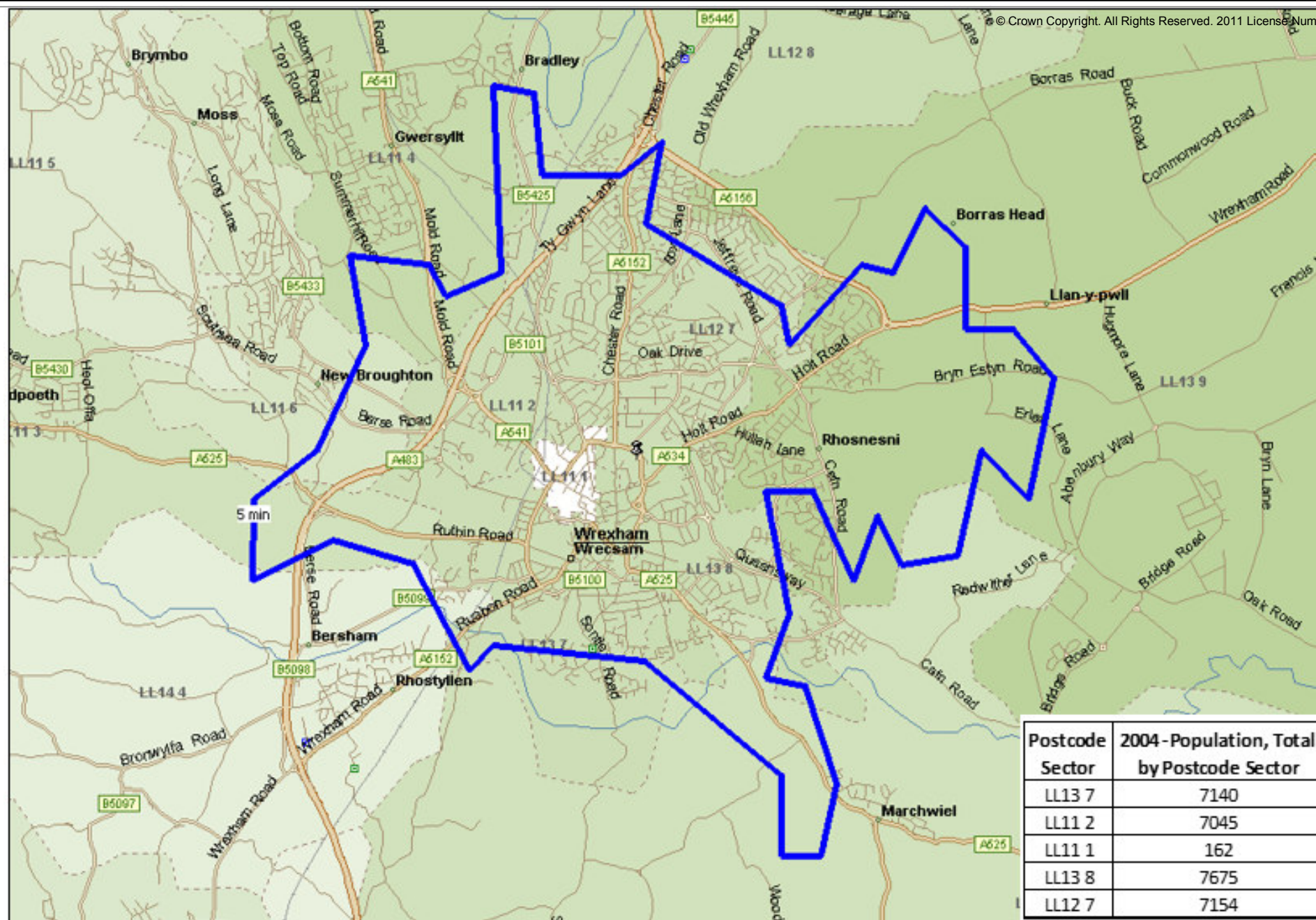
8. Retail Statement: Impact

- 8.1. Wrexham UDP does not offer any policies that relate to the undertaking of retail impact assessments in support of retail development proposals located outside town centres. Therefore, the requirements of PPW must be engaged.
 - 8.2. PPW requires retail development proposals located outside town centres to be supported by an assessment of their impact on existing town centres. TAN 4 confirms that such impact assessments are required for retail proposals of 2,500m² gross floorspace or more, or for smaller proposals that are expected to have a significant impact on town centres.
 - 8.3. The proposed Lidl store will extend to 2,125m² gross floorspace and the proposed drive-through coffee shop 187m² gross floorspace. The total floorspace proposed is, therefore, below the TAN 4 threshold for impact assessment. Accordingly, an assessment of retail impact is not automatically required and is only required if the proposal is expected to have a significant impact.
 - 8.4. In this regard, the Applicant contends that the following factors indicate that the proposed development is highly unlikely to have a significant impact on the Town Centre:
 - a) Wrexham Retail Assessment 2014 demonstrates a substantial need for additional convenience and comparison goods floorspace in Wrexham. There is, therefore, an expectation that new foodstore developments must come forward in order to meet this need;
 - b) Wrexham Retail Assessment also indicates that the Town Centre (excluding Eagles Meadow Shopping Centre and other edge of centre stores) achieves a total turnover in excess of £137m. Even if the proposed Lidl store drew all of its turnover from the town centre, which is extremely unlikely given the retail composition of the town centre and proliferation of edge-of-centre foodstores, this would equate to an impact of approximately -8%. This indicates that, in the real world, the actual impact of the proposal will be significantly below -8%;
 - c) Wrexham Town Centre's convenience food retail offer is limited. Accordingly, there are few retailers that the proposed Lidl store may draw and trade away from and, therefore, impact upon. Indeed, had there been a propensity for town centre food shoppers to be diverted away from the town centre to a Lidl store, these shoppers would have already been diverted to the existing Lidl store on Salop Road to the south of the Town Centre;
 - d) The vitality and viability of Wrexham Town Centre has not come under threat from the operation of the existing Lidl store on Salop Road. The proposed new Lidl store will sell an identical range of goods and will function in a very similar manner to the Salop Road store and there is no reason to suggest that the new store will bring about any unacceptable adverse consequences; and
 - e) The proposed store is most likely to compete with existing food shopping destinations, most of which are located outside Wrexham Town Centre in edge and out-of-centre locations. The increased competition brought about by the proposal will essentially result in the redistribution of expenditure between these edge and out-of-centre stores.
 - 8.5. The proposed development is, therefore, likely to have nothing more than a marginal impact on Wrexham Town Centre or any other defined town centre. The magnitude of that impact will not be significant and, as a result, there is no requirement for the Applicant to present a retail impact assessment in support of the proposal.
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9. Conclusions

- 9.1. This Statement has been prepared in support of a full planning application to deliver a discount foodstore and a drive-through coffee shop on the site of Wrexham Police Station on Bodhyfryd/Powell Road on the edge of Wrexham Town Centre.
 - 9.2. The proposed development has been assessed against the relevant planning policy tests, with the conclusion being drawn that the proposal satisfies policy at all levels and can be considered to represent sustainable economic development.
 - 9.3. It has been demonstrated that the proposal will make a positive contribution towards the character of the local area and will not have an unacceptable impact on the amenity of neighbouring residents. Any adverse impacts resulting from the proposal, which are in any event limited, can be effectively mitigated or controlled by planning conditions.
 - 9.4. It has also been demonstrated that the proposal is acceptable in technical terms and will not have an unacceptable impact on any heritage asset.
 - 9.5. A clear retail need for the proposal is demonstrated with reference to the Wrexham Retail Assessment, with the application site being the sequentially preferable location to deliver the proposed development. Whilst the impact test is not applicable to this scale of development, it has, nevertheless, been demonstrated that it is highly unlikely that the proposal would harm Wrexham Town Centre. On the contrary, the proposal accords with the Town Centre Masterplan which seeks to consolidate and enhance the vitality and viability of the Town Centre.
 - 9.6. Overall, the proposal will deliver a multi-million pound investment and is expected to create 45 full time equivalent jobs, which could translate into around 10 full time and 65 part-time jobs for local people.
 - 9.7. The proposal will result in the sustainable use of a previously-developed site in an accessible location in a manner that is fully policy compliant. Therefore, the Local Planning Authority should adopt a positive and constructive approach towards the proposals and seek to grant planning permission without delay.
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Appendix 1



Postcode Sector	2004 - Population, Total by Postcode Sector
LL13 7	7140
LL11 2	7045
LL11 1	162
LL13 8	7675
LL12 7	7154