



Z A N D E R
P L A N N I N G

Planning Statement

Plas Coch Retail Park, Wrexham

Ediston Real Estate

May 2018

Planning Statement

**Proposed drive-thru coffee shop together with access, parking,
landscaping and engineering work**

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1. Introduction

- 1.1 Zander Planning has been appointed by **Ediston Real Estate** to support the proposal for the erection of a drive-thru coffee shop and associated works on land in Plas Coch Retail Park, Wrexham.
- 1.2 The planning application description proposes the following:
- “Erection of drive-thru coffee shop (with associated external seating, retail sales and takeaway) together with parking, landscaping and engineering works and alterations to car park (Class A1 and A3)”
- 1.3 This Planning Statement has been prepared to assess the application proposal against the relevant provisions of the statutory development plan and other material considerations.
- 1.4 This report addresses the above requirements, and is structured as follows:
- Section 2 describes the site location and physical characteristics;
 - Section 3 provides a description of the proposed development
 - Section 4 reviews the policy framework, identifying policies and other material considerations relevant to the determination of the application;
 - Section 5 assesses the proposal and draws together our conclusions on the main planning issues.

2. Site and Surrounding Area

The Location and Site

- 2.1 The application site consists of land currently used for car parking within Plas Coch Retail Park. Plas Coch Retail Park is located to the north west of Wrexham town centre, adjacent to the A483 Wrexham Bypass and accessed from junction 5, which provides easy access to Wrexham Town Centre as well as the wider catchment, Chester and North Wales
- 2.2 The site is accessed via B5101 (Plas Coch Road) which is accessed off A483.
- 2.3 Plas Coch Retail Park consists of six retail warehouse units and a stand-alone Class A3 unit in a curved terrace, with shared car parking. In total there are seven retailers occupying the units as follows:
- DW Sport Fitness
 - Frankie & Benny's (class A3)
 - Currys PC World
 - Sports Direct
 - TK Maxx
 - Pets at Home
 - Boots
- 2.4 There is also a Sainsbury's foodstore and Aldi foodstore adjacent to the Park and a Homebase and Argos nearby.

The Site

- 2.5 The application site is presently occupied by car parking which is utilised as shared car parking for the existing Retail Park.

Planning History

- 2.6 The original planning permission was granted for Plas Coch Retail Park in 1996. This was for the erection of a multiplex cinema, restaurant and non-food retail units extending to 65,000sqft (6039sqm). This consent was implemented and the cinema was occupied by Odeon and the restaurant by Frankie & Benny's. (Ref: WRR CB00421).

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- 2.7 A subsequent change of use of Unit H (Odeon Cinema) from Class D2 to Class A1 retail, with alterations to the premises and the installation of a mezzanine, was granted planning permission (Ref: WRRP/2006/1144). This consent also included the provision of mezzanines in Units C and E.
- 2.8 Condition 2 of this consent require that the retail use shall not be commenced until a replacement cinema in Wrexham Town Centre has been brought into use. There is still an Odeon Cinema in the town centre but the condition does not require this provision in perpetuity so this has been complied with.
- 2.9 Conditions 4 and 5 restrict the sale of food from the unit and condition 6 allows the operation of a Health and Fitness Club where the retail unit is used for the sale and display of sports goods. This means that the two uses need to be operated together to comply with the condition. However, the unit can be used for any retail Class A1 goods (except food) and does not need to operate the health and fitness club.
- 2.10 A Certificate of Lawfulness was granted for the use of Unit B as a pet care and treatment centre in association with the retail unit operated by Pets at Home. (Ref: P/2010/0152)
- 2.11 A further Certificate of Lawfulness was granted in 2013, confirming that Units A to F can be used for any retail purposes in Class A1 including the sale of food. (Ref: p/2013/0702)
- 2.12 In 2014, consent was granted for the installation of a mezzanine floor in Unit C. This was to allow TK Maxx to trade from the unit. (Ref: P/2014/0827).

Pre-Application Enquiry

- 2.13 A pre-application enquiry submission was made to the Council ref: ENQ/2017/0189.
- 2.14 The feedback from the Council was *"The only concerns I have in relation to the proposed coffee shop and drive thru are in relation to highway safety. I have attached the consultation response from the highway authority which raises the concerns and within which some additional information is requested"*.
- 2.15 The above feedback does not raise any land use or planning issues with the proposed development, which is consistent with the conclusions of this planning statement. The key issue relates to traffic and parking as set out in the consultation response from Highways. This

response has been reviewed and addressed in the enclosed Transportation Assessment. No other issues were identified at Pre-Application Enquiry stage that required to be addressed through the planning application.

3. Development Proposals

- 3.1 Planning Permission is sought for the erection of a drive-thru coffee shop with ancillary external seating/takeaway, together with parking, landscaping and engineering works (Classes A1 and A3).
- 3.2 The floorspace of the proposed Costa Coffee shop extends to 167 sq.m GFA (Class A1/A3). The proposed unit has a drive thru' and external seating areas.
- 3.3 Vehicular access to the shared car parking will be as existing for the Retail Park. Similarly, pedestrian access is as existing. The proposed development will result in the reconfiguration of car parking at the Retail Park, with the overall loss of 24 spaces from the Retail Park.
- 3.4 The design of the proposed restaurant and coffee shop is modern and complements the existing retail development.

Proposed Costa Coffee Drive Thru

- 3.5 Costa Coffee was founded in 1971 by Italian brothers Sergio and Bruno Costa as a wholesale operation supplying roasted coffee to caterers and specialist Italian coffee shops. The company was acquired in 1995 by, and is now a subsidiary of, the Whitbread Company. Costa Coffee outlets provide a high-quality product served by specially trained staff in a welcoming environment.
- 3.6 Costa Coffee shops trade as a mixed Class A1/A3 use on the basis that the stores primarily serve hot and cold drinks and hot and cold food for takeaway. Where levels of seating and levels of eating sale take up a significant proportion of the use, it has been established throughout the country that a mixed Class A1 and Class A3 use takes place.
- 3.7 The proposed coffee shop, promoted as a mixed Class A1/A3 has a GFA of 167 sq.m.
- 3.8 The sale of hot drinks and food at Costa Coffee is therefore compatible with Class A1 use. The only food which is sold on the premises is soup/pasta/paninis/toasties/sandwiches and cakes, but these typically comprise a very small percentage of all sales. The preparation of the soup, pasta and paninis etc does not require a separate kitchen or any extractor equipment to

discharge odour and fumes. They are simply warmed in a microwave/heater or on a griddle behind the main servery.

- 3.9 Costa Coffee also sell consumable and comparison merchandise within the premises, including coffee beans, coffee machines, mugs, luxury chocolates and branded merchandise. This is Class A1 retail use.
- 3.10 The seating areas provided within Costa Coffee stores to allow customers to consume food and drinks on the premises equate to the Class A3 element of the operation.

4. Planning Policy Context

- 4.1 Plas Coch Retail Park and adjoining land is covered by the Wrexham Unitary Development Plan 2005.
- 4.2 This policy appraisal reviews Planning Policy Wales, Edition 9 2016, Technical Advice Note 4 2016, and the adopted Wrexham Unitary Development Plan.

Planning Policy Wales, Edition 9 November 2016

- 4.3 Planning Policy Wales (PPW) recognises that retail and commercial centres have undergone significant changes as a result of the impact of out-of-centre retail development, internet shopping and diversification within designated centres. It sets out objectives for retailing and town centres as follows:
- Promote viable urban and rural retail and commercial centres as the most sustainable locations to live, work, shop, socialise and conduct business;
 - Sustain and enhance retail and commercial centres' vibrancy, viability and attractiveness; and
 - Improve access to, and within, retail and commercial centres by all modes of transport, especially walking, cycling and public transport.
- 4.4 Paragraph 10.4.6 of PPW recognises that edge of centre or out-of-centre developments may seek, over time, to change the range of goods they sell or the nature of the sales area. It is stated that local planning authorities may wish to use appropriate conditions on the initial permission or any subsequent variation of condition. This relates to Welsh Government Circular WGC016/14, The Use of Planning Conditions for Development Management, which states in paragraph 5.110 that:
- "Retail parks can change their composition over time. If such a change would create a development that the planning authority would have refused on the grounds of impact on vitality and viability of an existing town centre, it may be sensible to consider the use of planning conditions to ensure that these developments do not subsequently change their character unacceptably."*

Technical Advice Note 4 – Retail and Commercial Development (November 2016)

- 4.5 It is recognised that retail parks do not form part of the retail hierarchy in terms of retail and commercial centres.
- 4.10 Section 6 of TAN 4 recognises that the tests for retail need are the starting point for new retail development. The requirement for considering the need for development is not relevant for retail proposals within a defined retail or commercial centre, but is required for any edge of centre or out-of-centre proposals as these are not in accordance with development plan.
- 4.11 TAN 4 also reinforces the objectives of Welsh Government Circular WGC016/14 – The Use of Planning Conditions, in that it encourages local planning authorities to use planning conditions to ensure that the character of a development cannot subsequently be changed to create a form of development that would be unacceptable, for example retail parks changing their composition over time that could create a development that the local planning authority would have otherwise refused due to its impact on the vitality and viability of existing retail and commercial centres.

Wrexham Unitary Development Plan 2005

- 4.13 The application site is designated as white land within the wider Settlement Boundary of Wrexham. It has no site specific land use allocation.
- 4.14 The location of Plas Coch Retail Park is out-of-town centre.
- 4.15 In terms of development opportunities, Wrexham's Unitary Development Plan (UDP) provides policies against which development proposals must be assessed.
- 4.18 Policy justification in relation to retailing in the adopted UDP sets out a focus for new development in Wrexham town centre and district centres before out of centre sites.
- 4.19 This application promotes small-scale development of Class A1 and A3 uses within an out-of town centre location, and therefore the following policies apply.
- 4.20 **Policy PS1** states that new development for housing, employment, and community services will be directed to within defined settlement limits/employment areas.
- 4.21 **Policy PS2** states that development must not materially detrimentally affect countryside,

landscape/townscape character, open space, or the quality of the natural environment.

4.22 **Policy PS7** states that the priority areas for new shopping and commercial office development will be the defined Wrexham Town Centre and district centre shopping areas.

4.23 **Policy GDP1** states that all new development should: -

a) Ensure that built development in its scale, design and layout, and in its use of materials and landscaping, accords with the character of the site and makes a positive contribution to the appearance of the nearby locality.

b) Take account of personal and community safety and security in the design and layout of development and public / private spaces.

c) Make the best use of design techniques, siting and orientation in order to conserve energy and water resources.

d) Ensure safe and convenient pedestrian and vehicular access to and from development sites, both on site and in the nearby locality.

e) Ensure that built development is located where it has convenient access to public transport facilities, and is well related to pedestrian and cycle routes wherever possible.

f) Ensure the safety and amenity of the public and safeguard the environment from the adverse effects of pollution of water, land or air, hazards from industry and quarrying, and associated noise, odour or vibration arising from development.

g) Secure public services (e.g. gas, water, electricity) to development at minimum public cost.

h) Safeguard sites and areas of nature conservation and wildlife interest, and to provide new habitats where there is an unavoidable loss of existing habitats and areas of wildlife interest.

i) Ensure that development does not result in, or is subject to, flooding, soil erosion, landslides or contamination, either on or off the site.

j) Have regard to the need to safeguard those areas that possess a strong Welsh cultural and/or linguistic identity from development that could harm this identity.

k) Secure the development of sustainable communities, through the promotion of the

economic, social and environmental well-being of the area.

4.24 **Policy GDP2** states that where the capacity of infrastructure, including community facilities, is likely to be deficient as a consequence of new development, a planning agreement/obligation will be negotiated whereby the developer provides the additional capacity either on or off-site, and/or provides funding for the Council to provide the additional capacity itself. Requirements will be fairly and reasonably related in scale and kind to the proposed development.

4.25 **Policy EC13** 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.

4.26 **Policy S6** states that small scale shopping developments will be allowed within settlement limits provided that: -

a) the development is safely accessible for customers on foot;

b) the development does not harm residential amenity and / or does not give rise to traffic problems e.g. on-street parking that cannot be addressed;

c) the sales floor area of each development does not exceed 300 square metres.

4.27 As the proposal promotes a mix Class A1/A3 use less than 300 sq.m, this is the most relevant policy for the scale and nature of the development proposed.

4.28 **Policy T8** relates to parking provision for new developments. It states:

“Policy T8 Development granted planning permission will be required to provide vehicle parking spaces either on site or nearby, in accordance with the Council's current parking standards. Special regard will be paid to the following factors, as appropriate: -

a) the availability of public transport nearby,

b) proximity to public car parking,

c) proximity to local services and facilities,

d) road safety hazards and amenity considerations arising from on-street parking in the vicinity of the site.

Where implementation difficulties arise in making parking provision on-site or nearby, the

Council will require a developer to make financial contributions for measures to assist public transport, or walking and cycling as appropriate.”

- 4.29 Local Planning Guidance provides further detailed guidance and advice for development proposals within the Wrexham County Council area. In relation to the proposed development of a coffee shop (Class A1/A3), the following Local Planning Guidance notes are relevant:
- 4.30 Local Planning Guidance Note 16 relates to parking standards, and provides further details relevant to policies GDP 1, 2 and T8 with regards to parking. The guidance note sets our maximum parking standards which is further addressed in the Transport Statement provided in support of the application.

5. Assessment of Proposal

- 5.1 Due to the scale and nature of the development proposed, it is considered that the application should be assessed against the policies of the adopted Wrexham Unitary Development Plan 2005.
- 5.2 The proposal involves the erection of a drive thru coffee shop, classed as a mixed Class A1 and A3 use, within the car park of Plas Coch Retail Park. The function of the coffee shop is predominately aimed at complementing the wider role of the retail park and the wider mixed uses in this area. The type of use proposed is consistent with the function of the retail park and given the nature of the proposed unit including drive-thru facilities, would not normally be accommodated in the Town Centre.
- 5.3 In addition, it should be noted that Costa Coffee already has three premises within Wrexham. One is within the Odeon Cinema in the town centre of Wrexham, one in Debenhams, and one in Island Green Retail Park – all of which are providing a complementary service to the retail offer within the town centre.
- 5.4 Consideration of the proposal against UDP is undertaken as follows.
- 5.5 The proposal is in accordance with **Policy PS1** as the development is promoted within the settlement limits of Wrexham.
- 5.6 The proposal is in accordance with **Policy PS2** as the development is within the wider Plas Coch Retail Park and will promote a design and scale suitable for the established retail location. Therefore will not have any impact on the townscape character.
- 5.7 **Policy PS7** seeks to direct new shopping and commercial development to the designated town centre of Wrexham. The proposal therefore does not accord with this specific policy. However, the proposed drive thru coffee shop is promoted in a location where there are established retail uses, and as such is complementary to the established use of Plas Coch Retail Park.
- 5.8 The proposed drive thru coffee shop (mixed Class A1 / A3 use) can be assessed against **Policy GDP1** as follows:
- a) The proposed development is within the established Plas Coch Retail Park, where there are Class A1 and Class A3 uses. It is considered that the development will respect the

site and its surroundings in terms of siting, layout, scale, form, character, design, and materials as it will be designed to fit and confirm with the wider retail park.

- b) The design and layout of the proposed coffee shop have considered the benefit from existing security and lighting within the established Retail Park, and therefore full account of personal and community safety and security has been considered.
- c) Energy and water resource conservation has been addressed as part of this proposal.
- d) Vehicular and pedestrian access will be retained as existing into the Retail Park. Access to the coffee shop drive thru, adjoining access and pedestrian access has been considered in the siting and layout of the development as per the plans provided, and has been addressed in the transport statement provided in support of this application.
- e) There are established public transport services that currently serve Plas Coch Retail Park and the proposed drive thru coffee shop will benefit from these established services.
- f) It is not considered that the proposed drive thru coffee shop will raise concerns regarding the safety and amenity of the public and safeguarding the environment due to pollution, noise, odour or vibration.
- g) The proposed development is within a built area where access to public services is already established, and it is proposed that the development can utilise the existing services on site.
- h) There are no sites of nature conservation or wildlife interest near or adjoining the proposed development site, and therefore this is not relevant to the development proposed.
- i) The site is not within an area of flooding or differing land levels. The proposed development is not considered to cause, or be subject to flooding, soil erosion, landslide or contamination on or off site.
- j) The proposed development site is within an established retail park, and there are no land or buildings within the vicinity of the development that are identified as having any historical or cultural value. Therefore, it is not considered the erection of a drive thru coffee shop will harm any strong Welsh cultural and/or linguistic identity.

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- k) It is considered that the proposed development of a drive thru coffee shop will complement the existing retail and restaurant offer available in Plas Coch Retail Park and the surrounding area. Therefore, the development proposal will enhance the social well-being of the area through improvement of services within the Retail Park for the wider residents of Wrexham.
- 5.9 **Policy GDP2** relates to the requirement for planning obligations where the development is likely to cause deficiencies in local infrastructure and services. It is considered that the scale and nature of the development means that this can be accommodated within the Retail Park without creating deficiencies to local infrastructure, and as such no planning obligations are required in this instance.
- 5.10 Sustainable urban drainage systems will be applied in the development, to ensure that the development will not result in an unacceptable impact on the water environment due to surface water run-off. As such, this proposal is deemed to be in accordance with **Policy EC13**.
- 5.11 **Policy S6** relates to small scale shopping developments. As the proposed development is for a small scale, mixed class A1 and A3 use, it is considered that this proposal should be considered against policy criteria as follows:
- a) The development is within the existing Plas Coch Retail Park. There are established pedestrian connections to and from the Retail Park that will also be utilised by pedestrians to access the proposed coffee shop. Pedestrian walkways exist at the retail warehouses and it is proposed that safe crossings from the existing walkways can be provided to the proposed coffee shop. Therefore, the proposed development can be safely accessed on foot.
 - b) The proposed development is within the car park of Plas Coch Retail Park and there are no residential areas within the vicinity of the application site. Therefore, the proposed development will not harm residential amenity and/or give rise to traffic problems that cannot be addressed.
 - c) As a mixed Class A1/A3 unit, it is confirmed that the proposed development does not exceed 300sqm.
- 5.12 Based on the assessment of policy criteria above, the proposed development of a drive thru coffee shop is in accordance with Policy S6.

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- 5.13 Policy T8 relates to parking provision for new developments. It is acknowledged that the proposed development of the drive thru coffee shop will result in the loss of parking spaces within Plas Coch Retail Park. However, the Transport Statement provided in support of this application clearly states that the revised parking spaces on site is more than sufficient to meet demand.
- 5.14 In relation to the policy criteria set out in Policy T8, the following comments can be provided:
- a) There are established public transport services which serve Plas Coch Retail Park, and the proposed drive thru coffee shop will benefit from these established services. Local buses provide a service approximately every 10 minutes to the Retail Park, making this an easily accessible location by public transport. This is further addressed in the Transport Statement lodged in support of this application.
 - b) Public car parking is provided on site, at a level deemed acceptable based on demand and use. Whilst there is a loss of spaces from the overall car park, the Transport Statement provided clearly shows that the revised car parking numbers are still sufficient to accommodate the level of demand at Plas Coch Retail Park.
 - c) The site is within the wider Retail Park, and it is assumed that shoppers will make linked trips to this location, to access the other retail services on offer.
 - d) It is not considered that the proposed development will result in on-street parking as there is sufficient car parking available within the Retail Park.
- 5.15 It is therefore considered that the proposal is in accordance with Policy T8 and no financial contributions are required to assist public transport, or walking and cycling as a result of this development. This is also in accordance with Local Planning Guidance Note 16.
- 5.16 Costa Coffee, due to the nature of its sales, is promoted as a mixed Class A1/A3 unit. Therefore, the promotion of Class A1 retail relates, in part to the proposed 167 sq.m.
- 5.17 The proposed development is not considered to represent one that would draw significant footfall from the town centre, particularly in this instance as the proposed occupier has an established presence in Wrexham town centre. Therefore, the proposed development is in accordance with policy.
- 5.18 Plas Coch Retail Park has a range of retail and commercial uses established on site, including

Class A1 and A3 use. The proposed use would be complementary to these. As a result, the proposed use would not be out of character to those adjacent uses and the established land use character of the area.

5.19 Overall, it is considered that the proposed development meets the relevant criteria set out in the Unitary Development Plan 2005 as it involves the creation of a small-scale drive thru coffee shop development that is consistent with the authorised uses on the application site and is consistent with the land use character of the surrounding area.

5.20 Matters relating to access, parking provision and flooding drainage are addressed in the plans and supporting information lodged as part of this application submission.

Conclusions

5.21 Taking all these matters into account, it is our opinion that the proposed development is consistent with the UDP for the following reasons;

- the application promotes a use appropriate within the wider mixed retail/commercial area;
- the proposal complements the function of the established Plas Coch Retail Park;
- the proposal complies with relevant policies in the adopted Wrexham Unitary Development Plan;
- All detailed matters have been addressed in supporting information to show that the proposed development can be accommodated at this location.

5.22 On the basis of the above, the proposed development should be viewed favourably and granted planning permission.