

PLANNING AND RETAIL STATEMENT

**Development of 1 no.
coffee drive thru unit
(Class A1 Use) and 1no.
drive thru restaurant
(Class A3 Use) and
associated works**

**A5156/A534 Roundabout,
Holt Road, Wrexham**

May 2021



Summary

Proposal:

Development of 1 no. coffee drive thru unit (Class A1 Use) and 1no. drive thru restaurant (Class A3 Use) and associated works

Location:

A5156/A534 Roundabout, Holt Road, Wrexham

Date:

May 2021

Project Reference:

S21.161

Client:

EG Group

Product of:

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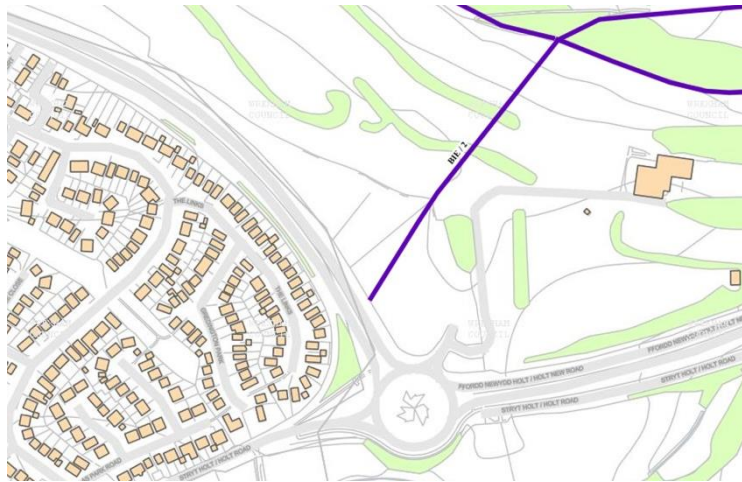
1. Introduction

- 1.1 This Planning and Retail Statement has been prepared on behalf of EG Group to accompany a full application for the development of Development of 1 no. coffee drive thru unit (Class A1 Use) and 1no. drive thru restaurant (Class A3 Use) associated works at land off the A5056/A545 Roundabout, Holt Road, Wrexham.
- 1.2 The development will serve as an ancillary use to the Petrol Filling Station granted Reserved Matters planning approval on 1st April 2019 (Ref: P/2018/1081) and latterly built out to form part of a comprehensive, modern roadside facility for which there is an identified need.
- 1.3 The purpose of this Planning Statement is to provide a clear and logical document to assess all material planning considerations associated with the proposed development.
- 1.4 This report addresses the planning policy issues raised by the application, particularly in relation to policy contained within PPW and the Wrexham Council LDP. It comprises the following:
 - Section 2 - A brief description of the site, its features and planning history.
 - Section 3 – Profile of EG Group.
 - Section 4 - The proposed development.
 - Section 5 - Identifies the relevant national and local planning policies for appraising the proposed development.
 - Section 6 – Economic development considerations.
 - Section 7 – A wider appraisal of the proposed development including sequential assessment.
 - Section 8 - Concludes why the application should be granted planning permission.

2. Site Context and Planning Background

Location and Access

- 2.1 The application site is located on land to the immediate north of the A5156/A534 roundabout, Holt Road, Wrexham. It is currently undeveloped land, adjacent to an operating petrol filling station which has historically been used for agricultural purposes.
- 2.2 Vehicular access is achieved via the PFS site and is shared with Wrexham Golf Club which is located to the immediate north of the subject site. A public right of way (Ref: BIE/2) bisects the site and extends from the Gold Course to the east, across the site to the A5156 where it ends, as shown on the Wrexham Definitive Rights of Way Map and Ordnance Survey Map below.



2.3 The site benefits from exceptional transportation links and is strategically located in order to access a wide highway network including the A5, A55, A543 and M6.

2.4 It is also located some 500 meters from bus stops on Brikdale Road (Service 35). The nearest centre to the site is located at Borrass Park Road which is 1KM west.

Site Features

2.5 The site is approximately 0.8 hectares in size and is irregular in shape. Similarly to the PFS site, it is uneven in respect of levels and raised from east to west. It is fenced off and comprises low level grass. This allows public and private land to be easily distinguishable in and around the site.

2.6 The land does not lie within any flood risk zones, as defined by NRW Development Advice Maps. There are a number of mature trees located along the site's eastern boundary whilst linear hedgerow comprises the western boundary.

Surrounding Land Uses

2.7 Surrounding uses comprise an operational PFS owned by EG Group. It is bounded to the south by the A5156. To the southwest of the A5156 are residential properties whilst Wrexham Golf Club is situated to the northeast.

Planning History

2.8 A planning history search for the property and its surroundings has been undertaken via the Council's online planning search system. The following applications are of note:

- CB00001 – Outline Planning Application for the erection of a Hotel/Leisure Complex, New Vehicular and Pedestrian Access – Granted on 12/01/1998
- CB02893 – Reserved Matters Approval relating to CB0001. Refused on 11/09/2000. Appeal allowed on 30/07/2001. Development did not commence and the permission lapsed on 30/07/2003.
- P/2016/0630 - Outline Planning Application (With All Matters Reserved Apart From Access) For Roadside Services Incorporating A Petrol Filling Station With Ancillary Kiosk, Family Pub/Restaurant, Drive-Thru Restaurant And Associated Car Parking – Withdrawn
- P/2017/0527 - Outline Application (With All Matters Reserved Apart From Access) For Roadside Services Incorporating A Petrol Filling Station With Ancillary Kiosk And Associated Car Parking And Works – Approved 05/11/2018

- P/2018/1081 – Submission of Reserved Matters Pursuant to Outline Planning Permission P/2017/0527 - Layout, Scale, Appearance, Landscaping for Roadside Services Incorporating A Petrol Filling Station With Ancillary Kiosk And Associated Car Parking And Works. – Approved 02/04/2019

3 EG Group

EG Group

- 3.1 Based in Blackburn, EG Group was founded in 2001 by brothers Mohsin and Zuber Issa with the acquisition of a single petrol filling station in Bury, Greater Manchester. In October 2017 the company rebranded its Europe Wide operations to the EG Group since establishing itself as one of Europe's fastest growing and most recognisable forecourt operators, with an expanding portfolio of 341 freehold-owned petrol stations located throughout mainland UK and a large number of separate roadside welfare facilities (roadside restaurants and motorway service areas). The company operates approximately 2,500 sites across Europe (including the UK) and employs approximately 12,500 people.
- 3.2 Alongside an innovative approach to roadside retail property, EG Group has forged high-profile relationships with nationally and globally recognised retail and convenience brands, now operating in excess of 142 Starbucks drive-to and drive-thru restaurants, 161 KFC restaurants, 12 Burger Kings, 153 Subway sub-stations, 4 Sbarro, 2 Cinnabon and 200 Greggs bakeries. EG Group is the largest franchisee for Subway in Europe.
- 3.3 The company's vision is to collaboratively engage and work with leading retail brand partners to be able to deliver a world class fuel, convenience, food and drink offer that exceeds the expectations of the modern consumer.
- 3.4 The company promotes the following values and business ethos:
- Market awareness with active responsiveness to convenience consumer trends and demands.
 - Delivering value and results consistently to shareholders, stakeholders and partners.
 - Commitment to on-going infrastructure and people investment to build a sustainable business model.
 - Supporting local communities with a view to empowering individuals to grow, contribute and succeed.
- 3.5 EG Group make sustainability a key consideration. To that end, in 2014 they invested £2.6m in providing solar panels for over 20% of the EG sites. In May 2017, it was announced that they would be providing an additional £6m into reducing their carbon footprint. Additionally, six motorway service stations feature rain water harvesting systems, collecting rain water which is then filtered to be used on site.

- 3.6 In 2014, EG Group invested £3.2m in the installation of LED lighting on sites throughout the estate. As well as consuming less energy than incandescent and high-intensity discharge (HID) lights, LED lights use only 2-17 watts of electricity, which is 25%-80% less energy than standard lighting systems, decreasing cost and impact significantly.

Petrol Stations Within the UK

- 3.7 Since 2001, 60% of independent forecourts have closed (4,000 sites) (Source: http://www.ukpra.co.uk/assets/PRA_MarketReview2016.pdf page 4). EG Group are going against this trend by providing a new roadside offer to compliment fuel sales.
- 3.8 This includes providing additional facilities for passing motorists badged as 'Food to Go' which form a vital element of the business operation and a key element of ensuring the viability of sites.

Sustainability

- 3.9 As a responsible developer, Euro Garages have investigated and implemented a series of core sustainable design principles within our project design, delivery and operation that align with a number of the UN Sustainable Development Goals (2015). Our developments also reduce potable water consumption through high quality water saving technologies within WC and Shower areas, where possible looking for opportunities to recycle / reuse water.
- 3.10 Environmental impact is further reduced on each of our sites with extensive landscaping promoting an increase in Biodiversity and Ecological habitats, we adopt detailed surface water drainage strategies that extensively provide improvement to run off rates and surface water pollution management through SUDS technology.
- 3.11 As a central part of our BREEAM and sustainability design response Euro Garages operate a Sustainable Material Procurement policy, this aims to influence design decisions in the specification of materials that are appropriate to the design and operation of the development considering; life cycle, maintenance, end of use, environmental management systems, responsible and local sourcing opportunities and capital cost. Our Sustainable Material Procurement policy also extends to the construction phase, establishing supply chain and local resource and training opportunities alongside material product certification and ISO accreditation.

4. Proposed Development

- 4.1 The application seeks full planning permission for the development of 2 no. drive thru units and associated works which will adjoin the recently opened PFS.

Layout

- 4.2 As shown on the proposed site layout, the development will be situated immediately northwest of the PFS. The two units will be positioned in the east and west of the site whilst the car parking area will occupy a central position between the two.
- 4.3 The scale of the two units is as follows:
- Drive Thru Unit 1 = 183m²
 - Drive Thru Unit 2 = 258m²
- 4.4 A total of 50 parking spaces are proposed within the central customer parking area, therefore 25 spaces are proposed for each unit. Access to the parking area will be achieved via the South of the site. The parking levels are based on EG Group a market leader in the provision of roadside services' extensive experience. Irrespective, given the drive thru nature of the proposal, it is considered that a large proportion of customers will access and egress the site without making use of parking provision.
- 4.5 It is now a fundamental part of design standards to ensure that new developments are as accessible as possible by several modes of transport. In this regard and as identified in Chapter 2, the site lies within close proximity to a bus stop along Brikdale Road from which a regular services operates providing users with transport into Wrexham Centre.
- 4.6 As evidenced in the previous Chapter, 60% of independent petrol stations throughout the UK have closed since 2001. To that end, a vital element to ensure their ongoing viability is to diversity their offer. Accordingly, this application relates to the development of 2no. drive thru units which will operate as ancillary uses to the primary use of the site as a Petrol Filling Station as part of a roadside service. In this regard, EG Group will operate the petrol filling station as well as the drive thru elements. This includes all management, employment, staff training and delivery of service for all uses on the site. This ensures that the PFS and drive thru elements are complimentary to one another and the whole site is managed effectively in terms of deliveries as well as keeping the site clean as it falls under one umbrella.
- 4.7 Landscaping is to be provided along the site's peripheries and as aforementioned, through the central parking area to enhance the

visual amenity of the area. In addition, the development is to retain the trees and hedgerows along the eastern and western boundaries where possible.

- 4.8 In regard to appearance of the proposed units, they will be engineered to one storey and comprise a modern design through the use of cladding, brick and steel frames.
- 4.9 It is proposed that the operating hours will comprise:
- Drive Thru Unit 1 – 24hrs
 - Drive Thru Unit 2 – 24hrs
- 4.10 Finally, the proposed development will result in economic benefits in the form of significant job creation in the form of:
- Drive Thru Unit 1 – 20-25 Jobs
 - Drive Thru Unit 2 – 20-25 Jobs

5 Planning Policy Context

- 5.1 This chapter will outline the relevant policies in regards to this proposed development, from documents such as Planning Policy Wales, Technical Advice Notes, Wrexham County Unitary Development Plan and the Deposit Local Development Plan.

Future Wales: The National Plan 2040

- 5.2 Future Wales: The National Plan 2040 adopted in February 2021 establishes a national framework setting the direction for development in Wales to 2040. It forms a development plan with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities.

- 5.3 Policy 6 of the Future Plan is in relation to a Town Centre First approach and states:

“Significant new commercial, retail, education, health, leisure and public service facilities must be located within town and city centres. They should have good access by public transport to and from the whole town or city and, where appropriate, the wider region.

A sequential approach must be used to inform the identification of the best location for these developments and they should be identified in Strategic and Local Development Plans.”

Planning Policy Wales

- 5.4 PPW Edition 11 was published in February 2021. It states that the Welsh Government remains one of the few administrations in the world to have a distinctive statutory duty in relation to sustainable development. The Well-being of Future Generations (Wales) Act 2015 places a duty on public bodies that they must carry out sustainable development. The Well-being Goals include:

- *A prosperous Wales*
- *A resilient Wales*
- *A healthier Wales*
- *A more equal Wales*
- *A Wales a cohesive communities*
- *A Wales of vibrant culture and thriving Welsh Language*
- *A globally responsible Wales.*

- 5.5 The planning system is central to achieving sustainable development in Wales. It provides the legislative and policy framework to manage

the use and development of land in the public interest which is consistent with key sustainability principles.

- 5.6 Paragraph 3.3 states *"Good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places. To achieve sustainable development, design must go beyond aesthetics and include the social, economic, environmental, cultural aspects of the development, including how space is used, how buildings and the public realm support this use, as well as its construction, operation, management, and its relationship with the surrounding area."*
- 5.7 PPW emphasises that the planning system should support economic growth within the context of sustainable development and that economic development should facilitate regeneration and promote social and environmental sustainability.
- 5.8 Paragraph 4.1.35 states *"New development must provide appropriate levels of secure, integrated, convenient and accessible cycle parking and changing facilities. As well as providing cycle parking near destinations, consideration must also be given to where people will leave their bike at home. Guidance on cycle parking is contained within the Active Travel Design Guidance. Planning authorities may alternatively wish to adopt locally specific minimum cycle parking standards and guidance."*
- 5.9 Para 5.4.2 states *"Economic land uses include the traditional employment land uses (offices, research and development, industry and warehousing), as well as uses such as retail, tourism, and public services."*
- 5.10 Para 5.4.4 States *"Wherever possible, planning authorities should encourage and support developments which generate economic prosperity and regeneration. Sites identified for employment use in a development plan should be protected from inappropriate development."*

Technical Advice Notes

TAN 12-Design

- 5.11 This Technical Advice Note was revised in March 2016 in order to update new requirements, including those for Design and Access Statements. The purpose of TAN 12 is to provide advice on design considerations and the role of the planning system in supporting sustainable and innovative design solutions. In relation to housing design, it states (Para 5.11.2) that local planning policy and guidance should aim to:

- create places with the needs of people in mind, which are distinctive and respect local character;
- promote layouts and design features which encourage community safety and accessibility;
- focus on the quality of the places and living environments for pedestrians rather than the movement and parking of vehicles;
- avoid inflexible planning standards and encourage layouts which manage vehicle speeds through the geometry of the road and building;
- promote environmental sustainability features, such as energy efficiency, in new housing and make clear specific commitments to carbon reductions and/or sustainable building standards;
- secures the most efficient use of land including appropriate densities; and
- consider and balance potential conflicts between these criteria.

5.12 This TAN also provides a definition of “character” which is contained within the guidance on designing in context (Para 5.8):-

“..... Appraising “character” involves attention to topography; historic street patterns, archaeological features, waterways, hierarchy of development and spaces, prevalent materials in buildings or floorscape, architecture and historic quality, landscape character, field patterns and land use patterns, distinctive views (in and out of the site), skylines and vistas, prevailing users and plan forms, boundary treatments, local biodiversity, natural and cultural resources and local distinctive features and traditions (also known as vernacular elements).”

5.13 The TAN goes on to state that opportunities for innovative design will depend on the existing context of development and the degree to which the historic, architectural, social or environmental characteristics of an area may demand or inhibit a particular design solution.

TAN 18-Transport

5.14 TAN 18 identifies that influencing the location, scale, density and mix of land uses and new development can help reduce the need to travel and length of journeys, whilst making it easier for people to walk, cycle or use public transport (Para 2.4).

5.15 With respect to housing development, TAN 18 states (Para 3.4) that settlement policies and residential allocations in development plans should:

- promote housing development at locations with good access by walking and cycling to primary and secondary schools and public transport stops, and by all modes to employment,

further and higher education, services, shopping and leisure, or where such access will be provided as part of the scheme or is a firm proposal in the RTP;

- ensure that significant new housing schemes contain ancillary uses including local shops, and services and, where appropriate, local employment;
- include policies and standards on density, and parking to achieve higher residential densities in places with good public transport accessibility and capacity;
- encourage residential layouts that incorporate traffic management proposals such as home zones, calming measures and 20 mph zones and where appropriate, layouts that allow public transport to pass through easily; and
- require layouts and densities, which maximise the opportunity for residents to walk and cycle to local facilities and public transport stops.”

TAN 23-Economic Development

5.16 TAN 23 defines economic development broadly so that it can include any form of development that generates wealth, jobs and income.

5.17 Paragraphs 1.2.1-2 highlight that the economic benefits of proposals and market needs should be fully considered when determining planning applications:

1.2.1 - The economic benefits associated with development may be geographically spread out far beyond the area where the development is located. As a consequence it is essential that the planning system recognises, and gives due weight to, the economic benefits associated with new development.

1.2.2 PPW advises that planning for economic land uses should aim to provide the land that the market requires, unless there are good reasons to the contrary. Where markets work well, this will help maximise economic efficiency and growth.

5.18 Further to the above, paragraph 1.2.5 states:

Local planning authorities should recognise market signals and have regard to the need to guide economic development to the most appropriate locations, rather than prevent or discourage such development.

5.19 Paragraph 2.1.5 states that where a planning authority is considering a site allocation or planning application that could cause harm to the environment or social cohesion, it should ask three questions in

order to help clarity and balance the economic, social and environmental issues. These are:

Alternatives: If the land is not made available (the site is not allocated, or the application is refused), is it likely that the demand could be met on a site where development would cause less harm, and if so where?

Jobs Accommodated: How many direct jobs will be based at the site?

Special Merit: Would the development make any special contribution to policy objectives?

Wrexham Unitary Development Plan

5.20 The Wrexham Unitary Development Plan 1996 – 2011 was adopted by Wrexham County Borough Council on the 14th February 2005. It is the principal document against which applications are assessed at a local level.

5.21 As shown on the proposals map extract below, the site lies outside, albeit within close proximity, of the settlement boundary for Wrexham and within a Green Barrier:



5.22 Consequently, the following policies contained within the UDP are considered relevant to the proposed development:

- **Policy PS1** - New development for housing, employment, and community services will be directed to within defined settlement limits/employment areas.
- **Policy PS3** - Development should use previously developed brownfield land comprising vacant, derelict or underused land in preference to the use of greenfield land, wherever possible, particularly so where greenfield land is of ecological, landscape or amenity value, or comprises agricultural land of grades 1, 2 or 3a quality.

- **Policy PS6** - Approximately 300 hectares of employment land will be made available for development between 1996 and 2011.

- **Policy GDP1** - 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.

- **Policy EC1** – Within Green Barriers, development will only be granted planning permission if it is for agriculture, forestry, essential facilities for outdoor sport and recreation, cemeteries and other uses of land which maintain the openness of the Green Barrier and do not conflict with the purpose of including land within it.

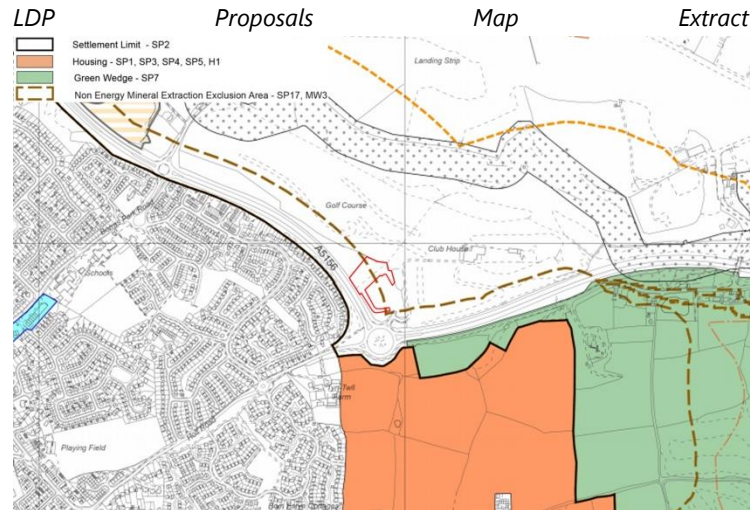
- **Policy E4** - Employment development on unannotated land within settlement limits will be permitted subject to Policy GDP1.4.27
- **Policy EC4** - Development proposals should provide for the conservation and management of hedgerows, trees, orchards, woodland, wildlife and other natural landscape and water features, and include new planting in order to enhance the character of the landscape and townscape. Development which results in the loss or significant damage to valuable trees, important hedgerows or ancient woodland sites will not be permitted.
- **Policy S2** - Outside the principal shopping streets of Wrexham Town Centre, encouragement will be given to ground floor retailing proposals. Mixed use commercial development will be allowed only if it enhances the vitality and environmental quality of the area.
- **Policy S3** - In order to sustain and enhance its vitality and viability, Wrexham Town Centre will be the preferred location for non-shopping uses, such as offices providing services to the public at large, and for major leisure uses. Proposals for such uses will be permitted firstly within the town centre where they are readily accessible to public transport facilities, followed by edge-of-centre locations, provided that they are of a scale appropriate to the size and function of the town centre and would help to sustain and enhance the vitality and viability of the town centre as a whole.

As with retail proposals, only where there is a clearly defined need (defined in accordance with individual proposals) which cannot be accommodated on a site or sites in preferred locations, should out-of-centre sites accessible by a choice of means of transport, be considered. A developer must demonstrate that all potential sites in preferred locations have been thoroughly assessed, before proposing less central sites for other key town centre uses.

Wrexham Local Development Plan

- 5.23 The Wrexham Deposit Local Development Plan has been submitted to the National Assembly for Examination. Whilst the Plan currently holds no standing from a land management perspective it is considered that given the advancement of it, the policies in relation to this application should be discussed.

- 5.24 As identified on the Deposit Proposal Map below; the site lies outside, albeit within close proximity to the settlement boundary of Wrexham which runs along the east of the A5156, as shown on the proposals map extract below:



- 5.25 Strategic Policy SP2 relates to the Location of New Development and states:

New development is directed to the defined settlement limits and employment areas as identified on the Proposals Map.

- 5.26 In regard to Development outside of Primary Shopping Streets, Policy R4 of the deposit Plan states:

Outside the primary shopping streets of Wrexham Town Centre support will be given to ground floor retail, professional services, food and drink, leisure, commercial and other proposals that would enhance vitality and viability. Support would also be given to the conversion of upper floors to residential uses within the town centre.

Outside the primary shopping streets of Wrexham Town Centre, ground floor residential uses would be supported where they do not harm the vitality and viability of the street, but would not be supported in Chester Street (south from Holt St, Charles Street, Church Street, Town Hill and Yorke Street).

- 5.27 Moreover, Policy R6 relates to Retail Development (Edge and Out of Centre) and states:

Retail development will only be permitted outside Wrexham Town Centre, District, Local, Village and Neighbourhood Centres if:

- i. *There is a need for the proposed floor-space (with precedence accorded to establishing quantitative need), and*

- ii. *That the need cannot satisfactorily be accommodated within or adjacent to Wrexham Town Centre, a District, Local, Village or Neighbourhood Centre, and*
- iii. *The proposal would not cause unacceptable harm to the vitality, attractiveness or viability of Wrexham Town Centre, a District, Local, Village or Neighbourhood centre; and*
- iv. *The site is accessible by a choice of means of transport, or*
- v. *The proposal is for small scale retail development with a floor-space of 100m² or less meeting local needs*

5.28 In light of the above, it is considered that a Sequential Assessment is required to demonstrate that the proposal would not impact upon the vitality of designated shopping centres. The supporting text of Policy R6 confirms that the Assessment would be required in relation to this application as the scale of the development exceeds 100m².

6 Sustainable Economic Development

- 6.1 Sustainable development is identified in the PPW as a golden thread running through the planning system.
- 6.2 The application site is located immediately adjacent to a petrol filling which is operated by EG Group. It is the intention of the company to provide a comprehensive roadside service of modern standards and expectations at the site via the introduction of 2no. drive thru's.
- 6.3 EG Group are committed to a significant investment in order to improve the site, subject to receipt of a satisfactory planning permission. The proposal is therefore not speculative and should planning permission be granted then it is anticipated that the scheme could be delivered immediately upon receipt of planning permission and discharge of pre-commencement conditions.
- 6.4 The proposed development will result in a significant improvement in respect of the service offered from it for which there is an identified need.
- 6.5 The site is in a prominent location. Further to this, it is in a highly sustainable location, given its accessibility to public transport links. It is an ideal site for a service station with an eye on driver welfare.
- 6.6 As shown on the proposed elevational drawings, the design/appearance of the proposed development will be of lower scale than the PFS' canopy at the site and be modern in appearance.
- 6.7 The development will provide a vital service and comprise key infrastructure on the highway network where a significant number of people travel through the wider area and as part of their daily commutes, for business and for tourism purposes.
- 6.8 It is clear that the proposed development will comprise a sustainable and positive use of a site. It is considered important from an economic development perspective that such sites are seen to be in positive use.
- 6.9 The proposed development will result in a series of economic benefits including the creation of 40-50 jobs.
- 6.10 Given EG Group's holistic approach to the management of their facilities, all staff are to be locally based and benefit from a training and employment programme. Therefore, should the application be approved, the development will result in a significant contribution towards local employment provision which comprises a material

consideration in the determination of the application.

- 6.11 Further to the above, the Covid-19 health crisis has had a direct impact upon the property market through the disruption of both existing property transactions and proposed development and construction projects. The full 'demand-side' impact upon the wider economy is yet to unfold. Notwithstanding, the Bank of England and Office of Budget Responsibility have both predicted that the UK could face its deepest recession in over 200 years.
- 6.12 The crisis has had an immediate impact on the use of employment floorspace. Whilst a number of national stores have recently announced closures resulting in job losses, EG Group are committed to a significant capital investment subject to improve the site subject to receipt of a satisfactory planning permission – resulting in the creation of a significant number of new positions. It is therefore not speculative.
- 6.13 It is therefore concluded that the proposed development comprises sustainable economic development which will enable sustainable economic growth in an appropriate location for a roadside offer.

7 Appraisal

7.1 In this section, an appraisal of the proposed development is provided. The following observations set the context for the appraisal:

- Existing development at the site comprises a PFS. The intention by way of this application is to provide a modern, comprehensive service facility linked to driver welfare.
- The site is strategically located in order with immediate access a wide highway network including the A5, A55, A543 and M6. It is an ideal location for the intended facility.
- As discussed, in further detail below, there are no drive thru uses or roadside facilities of within close proximity to the site serving the A534.
- There is a significant number of roadside services to the South of Wrexham, but a clear under provision serving the North / West of the Town.
- The application is tailored to the specific requirements of EG Group, experienced operators of such outlets. It is not speculative.
- The proposed development will result in significant economic benefits in the form of 40-50 positions.
- The Unitary Development Plan or forthcoming LDP does not identify sites for roadside facilities. Such uses can only operate in specific locations, adjacent to heavily trafficked roads.

7.2 The application proposes the construction of 2 no. drive thru units which are to comprise a complimentary use to the recently built out PFS on adjacent land.

Compliance with Policy S3

7.3 In assessing the acceptability of the proposal against the land management policies for the area contained within the Wrexham County Borough UDP / forthcoming Local Development Plan. It is considered that given the proposal relates to the development of 2 no. drive thru units outside of a defined retail centre, the most pertinent policy to consider is Policy S3 which states that only where there is an identified need will retail uses outside of defined shopping centres be permitted. As aforementioned, there are no drive thru operations or roadside sites of modern standards within close proximity to the site with a focus on comprehensive driver welfare facilities.

7.4 Moreover, Policy S3 states that retail developments outside of a defined centre should be readily accessible by a variety of means of transport. In this regard, the site is strategically located along the main highway network, which contributes to the vitality of the existing PFS

development. In order for roadside / drive thru Units to be successful, it is essential that they are positioned along highway networks which are subject to high trip rates. The site's location within close proximity to major roads including the A5156 and A534 as well as adjacent to the PFS highlights the appropriate location for the proposed development.

- 7.5 The application is accompanied by a Transport Statement prepared by DTP. The report discusses the accessibility of the site via a range of sustainable travel options including walking and cycling. As aforementioned, the proposed development is to be provided with adequate cycle provision and is within good cycle accessibility from local residential areas.
- 7.6 The report identifies that the site is located within 500m of bus stops on St Mellion Crescent and Birkdale Road. Service number 35 operates from these stops providing users with regular transport to Wrexham town centre.
- 7.7 As aforementioned, a Public Right of Way (Ref: BIE/2) bisects the site. It is acknowledged that a formal diversion of the footpath will be required to accommodate the proposed development. Notwithstanding, the presence of the footpath reflects the site's accessibility.
- 7.8 Furthermore, it is clear from EG's business model that the various elements of developments (such as the drive thrus proposed as part of this application) comprise vital elements of ensuring that the main element (i.e petrol station) is a viable, long term option as part of a comprehensive roadside offer.
- 7.9 Evidence has been provided highlighting that 60% of independent filling stations in the UK (4,000) have closed since 2001. It is therefore considered that the development of the drive thru units will contribute to the vitality of the wider site's primary function as a PFS given that the existing trend for single use site comprising solely a PFS is to fail.
- 7.10 Policy S3 also stipulates that in order for out of centre retail developments to be considered acceptable, evidence should be provided to demonstrate that no preferable site's exist within the defined boundary of a retail centre. A sequential assessment of potential development sites within defined retail centres is provided as part of the submission to the Council.
- 7.11 In light of the above, it is considered that the above has sufficiently demonstrated that the development, as proposed, will not detract from the vitality and viability of Wrexham Town Centre or other

established centres, as such, is compliant with the most pertinent policy (S3) contained within the Wrexham County Borough Council Unitary Development Plan.

Compliance with Policy EC1

- 7.12 The site lies within a green barrier, as such, Policy EC1 of the adopted UDP is applicable. It is acknowledged that this policy aims to limit development within green barriers to proposals only for the purposes of agriculture, forestry, outdoor sport/recreations and *other uses which maintain its openness and do not conflict with the purpose of including land within in it*. In this regard, the site is enclosed by strong, logical and defensible boundaries comprised of mature hedges and trees along the eastern boundary with the Golf Club situated beyond which separates the site from the remainder of the Green Barrier land. Moreover, the site is bounded by the A5156 and the PFS scheme to the west and southeast respectively. As such, development of the site would not undermine the wider openness of the green barrier.
- 7.13 It is therefore considered that the site can be developed in isolation and would not result in the coalescence of settlements as the function of the green barrier would remain if the site is developed. The development of the site would not compromise the purpose of including land within the green barrier designation.
- 7.14 Notwithstanding the above, a review of Green Barriers (Ref: EBNB01) was undertaken by Wrexham County Council in January 2017. The report concluded that the Green Barrier status should be removed from the site and its immediate surroundings given that the area is characterised by a mixture of undulating farm land, sports pitches and a golf course. Built development within this portion of the green barrier comprises a mixture of farm complexes and residential properties. Moreover, the report notes that the deallocation of the area would not result in the coalescence of settlements given the topography of the area and the fact that development in this location can be controlled (if required) by the presence of settlement limits.
- 7.15 The removal of the green barrier in this area is reflected in the Deposit LDP Proposals Map as the site is identified as being within open countryside only. In light of the above, it is considered that a departure from Policy EC1 in this instance is acceptable.

Compliance with Policy R6 of the LDP

- 7.16 It is acknowledged that the Local Development Plan is yet to be adopted and therefore holds no weight in the determination of current applications. However, given its expected imminent adoption it is considered pertinent to discuss the most relevant policy contained

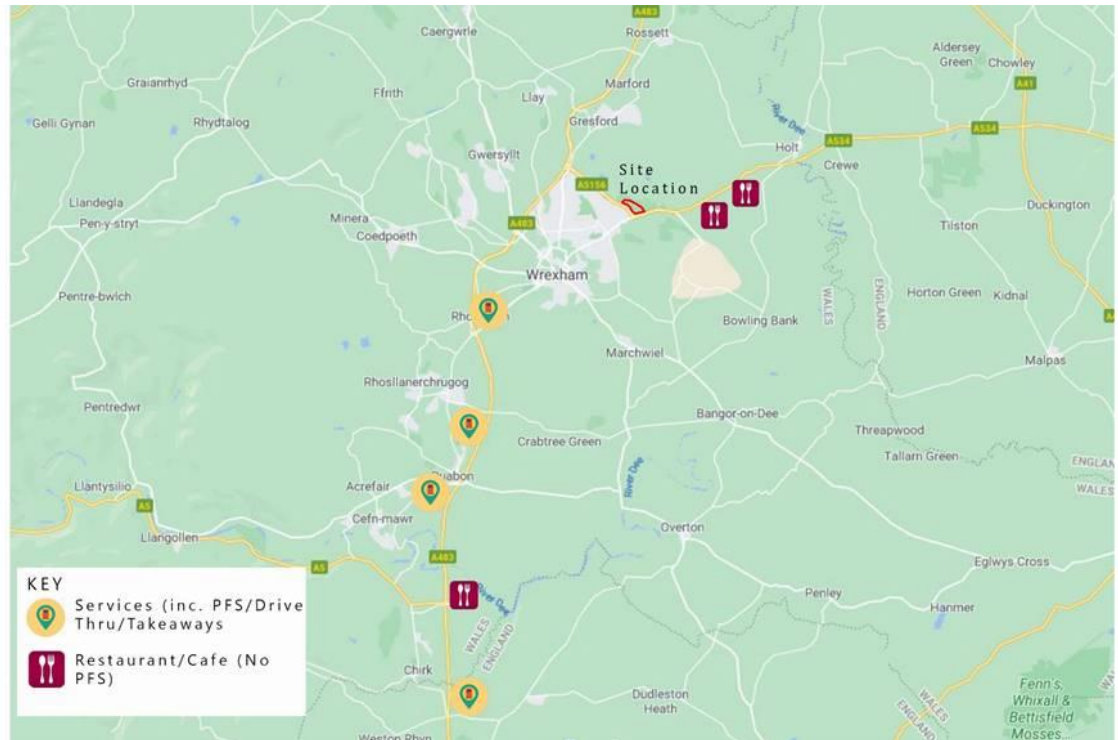
within the Plan – Policy R6: Retail Development (Edge and Out of Centre).

Criterion i – Need for Development

- 7.17 Policy R6 states that retail uses appropriate to a town centre will not be permitted outside of a centre unless there is a need for the development which could not be reasonably accommodated within a town centre. To reiterate the points outlined above, there are no drive thru units within close proximity to the site as shown on the plan below:



- 7.18 As identified above, there are no existing facilities between the A5156 and A534 and Wrexham Industrial Estate and the A483, which in turn provides access to the wider strategic highway links of the A5 in the south and the A55 North Wales Coast Road in the north. As such, the Drive Thru operations will serve as a complimentary use for the wider site aimed at attracting passing motorist travelling on the highway network.
- 7.19 Further to the above, the lack of comprehensive roadside facilities serving the A534 in comparison to those serving the A483 to the South of the Town is stark. On the A534, 5 roadside facilities are located within 12 miles of each other. The A483 does not benefit from any comprehensive roadside offer within the LPA boundaries. The below table and map highlight the clear need for additional facilities to serve the highway:



Review of A-Road (A483) Running South (Out of Wrexham Town Centre to the LPA Boundary)	
Location	Description of Facilities
1. Glendrid Roundabout, St Martin's, Oswestry, SY11 3EN (Along the A5, directly on the border of Wrexham)	PFS M&S Simply Food Wild Bean Café Chirk Truck Shop
2. Chirk Retail Park, Chirk Bypass, Wrexham, LL14 5AZ	Mcdonalds Drive Thru InstaVolt Charging Station No PFS
3. James Park Way, Ruabon, Wrexham, LL14 6EQ	PFS Greggs Subway Spar Costa Coffee
4. Ruabon By Passage, A483, Ruabon, Wrexham, LL14 6YY	PFS Maahis Indian Restaurant Khazana Tandoori Restaurant (Takeaway)
5. Euro Garages, Rhostyllen Service Station, Wrexham Rd, Rhostellyn, Wrexham, LL14 4EJ	PFS Subway Starbucks Spar Convenience Store Travelodge Wrexham

Review of A-Road (A543 & Wrexham Road) Running East (Out of Wrexham Town Centre to the LPA Boundary)

Location	Description of Facilities
Llan-Y-Pwll, Holt Road, Wrexham, LL13 8NE	Crafty Corner (Café) No PFS
Wrexham Road, Holt, Wrexham, LL13 9SW	Holt Lodge Hotel (Classic lodging with dining & bar) No PFS

Review of A-Road (A483) Running North (Out of Wrexham Town Centre to the LPA Boundary)

Location	Description of Facilities
No PFS, drive thru or restaurants along the A483 running north out of Wrexham Town Centre, to the edge of the County's settlement boundary.	

- 7.20 It is therefore considered that there exists a clear and indisputable identified need for a modern roadside services development serving the A543 in the form of a PFS and complimentary food and drink units in accordance with Criterion i of Policy R6.

Criterion ii – Need cannot be satisfied within existing retail centres

- 7.21 Please refer to the Sequential Assessment contained within the wider application package which assesses the development potential of sites within existing retail centres to accommodate the proposed development.

Criterion iii – Harm to the vitality, attractiveness or viability of Wrexham Town Centre, a District, Local, Village or Neighbourhood centre

- 7.22 Given the site's location along the A5156 and A534 and adjacent to the PFS, it is clear that the proposed Drive Thru units will primarily draw trade from passing motorists. It is unlikely in the extreme event that individuals will alter their shopping patterns to show preference for the wider roadside facility to be created by the establishment of the Drive Thru units along with the PFS. Moreover, Town, District, Local, Village or Neighbourhood centres do not have frontage onto A Roads which is essential for the success of the proposed development and is in reaction to a specific need identified in the discussion on Criterion i, which cannot be reflected elsewhere.
- 7.23 Further to the above, given the nature of the roadside service industry, it is generally accepted that such uses which primarily serve motorists would not typically be found within a town or local centre. This is a

position accepted by the Planning Inspectorate (APP/C3105/W/16/3151655).

- 7.24 For the avoidance of doubt, the approach proposed through the development of the Drive Thru units as ancillary uses to the PFS is a standard and consistent model adopted by Euro Garages (e.g. Rhostyllen Service Station, Ross-on-Wye, Monmouth, Blackburn, Frontier Park, Cheshire Oaks, Dunblane) as well as other operators.
- 7.25 Since 2001, approximately 4,000 independent petrol forecourts have closed across the UK. This is primarily as a result of the increased number of 'supermarket' filling stations. These closures also reflect the expectations of consumers/motorists who now expect more from PFS operations; often the expectations of customers cannot be met due to the restricted size of sites and retail areas. Whilst Planning Policy is generally silent on the approach used to assess roadside facilities, EG Group take a consistent approach throughout the UK.
- 7.26 In this regard, EG Group comprise a market leader. All of their drive thrus are located outside of the core of established centres. It has been held by the Planning Inspectorate that drive thrus can act as part of a roadside facility (APP/C3105/W/16/3151655) for the following reason:
- "Given that the purpose of this development is to provide roadside facilities for motorists on the A43, which by definition is unlikely to be within a town centre, I consider the sequential test to be of little relevance to this appeal and this was confirmed by the Council at the hearing. Furthermore, the Council's statement¹ notes that disputing whether or not there are alternative sites available will not be beneficial to either party. The Council also confirmed at the hearing that the question of alternative sites does not arise in this case, as there are none under consideration."*
- 7.27 Whilst the above related to the sequential element, it is clear that there is a difference between a typical town centre operation as and a roadside operation. As an example of how a typical coffee outlet operates at a roadside service EG Group reviewed their site in Leeds. Between 11th September and 2nd October 2017 an average of 82% of customers bought their product 'to go'. For the flagship site in Blackburn as a second comparison, 55% of customers used the drive thru and a total (including drive thru) of customer 'to go' orders was 77%.
- 7.28 Further to the above, the site is strategically located with accessibility to the major highway network. As such, it is considered that a high percentage of the users of the wider site will comprise passers-by from outside of the Authority boundaries. As such, the proposed

development will contribute to the roadside facility of the wider site which is not a destination in its own right.

- 7.29 Further to the above, the site is strategically located to the west of the A5156 and a large area of residential development to the east of Wrexham Town Centre which would act as barriers, thus individuals would not be attracted away from the established centres as a result of the development. Irrespective, as highlighted in the sequential assessment, the nearest centres clearly form a local function and would not be in competition with the proposed development.
- 7.30 TAN4 identifies that retail impact assessments should be undertaken where 2,500 sqm floorspace and above is proposed in out of centre locations. The combined floorpace proposed is 441 sqm (GEA). Accordingly, the figure is just 17% of the threshold figure. It is clear that the proposed development will not give rise to unacceptable impact considerations.
- 7.31 Consequently, it is considered that the distance of the site from the centres is of sufficient extent to ensure that their vitality and viability will not be compromised as a result of the proposed development.
- 7.32 As such, the scheme complies with criterion iii of Policy R6.

Criterion iv – Accessibility

- 7.33 As aforementioned, the Transport Statement prepared by DTP identifies that the site is readily accessible via a variety of modes of transport other than the private car. The proposed layout also incorporates disabled parking provision. In light of the above, it is considered that the scheme satisfies criterion iv of Policy R6.

Criterion v – development over 100m²

- 7.34 As identified in the Planning Policy chapter, the supporting text of Policy R6 stipulates that when out of centre retail development exceeds 100m², a sequential test should be undertaken to evidence that there are no preferable sites located within defined centres. The results of the sequential test undertaken in relation to the proposed development are provided as part of the application package. The development is therefore in accordance with Criterion v of Policy R6 of the Deposit LDP.

Other Material Planning Considerations

- 7.35 A comprehensive suite of documents has been submitted as part of the planning application package. Accordingly, a summary of other considerations is provided below:

Economic Considerations

- 7.36 A summary of economic considerations is provided in Section 6 of this Statement. Notwithstanding, it is reiterated that the proposed development will result in the creation of 40-50 positions.
- 7.37 The importance of sustainable economic development is a golden thread running through planning policy at a national level. Given this, the Council should be minded to adopt a positive approach in the determination of the planning application.

Ecology

- 7.38 Rachel Hacking Ecology have provided an Extended Phase 1 assessment in respect of ecology which confirms:

Protected species are a material consideration when a planning authority is considering a planning application. The presence of protected species, the effect of the proposed development and suitable mitigation, if required, must be established before planning permission can be granted. Following the findings from the Extended Phase 1 Habitat Survey, the following survey may be required:

• Nesting Birds - If any work to the hedgerow or scrub needs to be carried out within the bird nesting season (which is generally March to August), then a nesting bird survey will be required immediately prior to work commencing. Habitat Enhancement

General recommendations to bring biodiversity gain to the site are:

- Soft landscaping should include the provision of native and non-native flowering perennial species, to provide a pollen and nectar source for invertebrates.*
- Bird boxes and/or bat boxes should be erected on the new buildings where possible.*
- Trees planting of native species where practically possible.*

Trees and Landscaping

- 7.39 Mackley Davies Associates Ltd have prepared a Tree Survey to support the application. The report confirms that no Category A trees at the site will be removed or damaged as a result of the proposal.
- 7.40 The application is accompanied by a Landscaping Plan provided by DEP which shows a pleasant environment will be created for customers and staff.

Ecology

- 7.41 The application is accompanied by an Extended Phase 1 Habitat Survey prepared by Rachel Hacking ecology. The report confirms:

Protected species are a material consideration when a planning authority is considering a planning application. The presence of protected species, the effect of the proposed development and suitable mitigation, if required, must be established before planning permission can be granted. Following the findings from the Extended Phase 1 Habitat Survey, the following survey may be required:

- *Nesting Birds - If any work to the hedgerow or scrub needs to be carried out within the bird nesting season (which is generally March to August), then a nesting bird survey will be required immediately prior to work commencing.*

Habitat Enhancement

General recommendations to bring biodiversity gain to the site are:

- *Soft landscaping should include the provision of native and non-native flowering perennial species, to provide a pollen and nectar source for invertebrates.*
- *Bird boxes and/or bat boxes should be erected on the new buildings where possible.*
- *Trees planting of native species where practically possible.*

Drainage

- 7.42 A Drainage Strategy and Surface Water Drainage Strategy including SAB requirements had been prepared by Civway detailing a comprehensive approach.

Highways

- 7.43 As aforementioned, a Transport Statement, prepared by Dynamic Transport Planning form part of the application package. The note confirms:

The development proposals will form additional provision at the existing Holt Road Services and will be accessed via the adjacent services site.

A swept-path analysis has been undertaken for a 7.5t Box Van and large car to demonstrate that vehicles will be able to safely manoeuvre within the proposed development.

The level of car parking provision is shown to align with local parking standards, with proposed cycle parking to encourage access by bike. The highway accident data has been reviewed for the most recently available fiveyear road safety record for the area surrounding the site.

The data does not demonstrate any pre-existing patterns or trends of incidents that could be affected by the development proposals. The accessibility of the site for non-car modes of travel has been assessed.

It is considered that the site is located to allow for some journeys by sustainable modes, particularly for staff. The trip generation assessment shows that the proposed drive-through units would generate around 10 new trips during the AM/PM peak-hour periods, with the majority being pass-by trips from the adjacent A5156/A534/Holt Road/Services roundabout.

Although the proposed development is likely to generate a relatively low level of new trips, a capacity assessment of the adjacent roundabout has been undertaken in order to provide a comprehensive assessment.

The assessments show that with the application of development related traffic, the roundabout will continue to operate within capacity during the 2021 and 2026 assessment year scenarios.

The model results therefore suggest that traffic associated with the proposed development would not have a material impact on the operation of the A5156/A534/Holt Road/Services roundabout.

Overall, on the basis of the above assessment it is concluded that there are no outstanding reasons why the proposed development should not be granted planning permission on highways grounds.

Air Quality

- 7.44 Miller Goodall have prepared an Air Quality Assessment which confirms:

The assessment has considered whether the proposed development could significantly change air quality during the construction phase. With the implementation of mitigation measures, the dust impacts from the construction are considered to have no residual effects when considered following Institute of Air Quality Management Construction Guidance.

The proposed development is for commercial use, therefore the annual or 24-hour air quality objectives do not apply. A review of local air quality concludes the site is below the indicative concentrations of when exceedance of the NO₂ one-hour objective may occur. The proposed development site is therefore considered suitable for commercial use with regards to air quality.

The traffic associated with the proposed development is not expected to have a significant impact on local air quality. The vehicle generation would be below the criteria for detailed assessment on the surrounding roads. The traffic associated with the proposed development is not expected to have a significant impact on local air quality when considered following Environmental Protection UK & IAQM Institute of Air Quality Management Guidance.

A kitchen odour risk assessment has been undertaken for the fast food drive-thru using the score-based risk assessment procedure in EMAQ+ Control of Odour and Noise from Commercial Kitchen Exhaust Systems. The risk assessment concludes there is a high level of odour control required for the kitchen and ventilation. Various mitigation has been outlined, such as flue positioning and use of filters, which will ensure the risk of odour during operational phase is insignificant.

There is, therefore no reason for this application to be refused on the grounds of air quality or odour.

Conclusion

- 7.45 It has been comprehensively evidenced that the proposal will result in significant economic benefits in the form of job creation. Further to this, there is a clear need for the proposed development in qualitative and quantitative terms and the impact of the proposal will be minimal. The Drive Thru operation will form an ancillary use to ensure the primary function of the wider site as a roadside service including PFS remains a viable and long-term option.

8 Conclusion

- 8.1 This Planning Statement has been prepared on behalf of EG Group in respect of their application for the proposed 2no. Drive Thru units at A5156/A534 Roundabout, Holt Road, Wrexham.
- 8.2 The Drive Thru operations will form act as a complimentary use to ensure the primary function of the wider site as a PFS remains a viable long term option as part of a roadside service with a focus on driver welfare.
- 8.3 It has been evidenced within this statement that here is a clear need for the proposed development and the impact will be minimal. A sequential assessment has been undertaken to demonstrate that there are no preferable sites which are suitable, viable or available in the relevant centres.
- 8.4 The proposal will result in significant economic benefits in the form of 40-50 FTE positions. This comprises a material consideration in the determination of the application.
- 8.5 This Statement has demonstrated that the development, as proposed, is compliant with relevant policies contained within the adopted Unitary Development Plan. Furthermore, pertinent policies contained within the yet to be adopted Local Development Plan have also been addressed and are considered to be in accordance with the proposed development.
- 8.6 In conclusion, the proposed development will result in a series of benefits including significant economic benefits. It is therefore respectfully requested that Wrexham County Borough Council grant planning approval for the proposed development of Development of 2 no. drive thru units and associated works at land at A5156/A534 Roundabout, Holt Road, Wrexham.