

SEQUENTIAL ASSESSMENT

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

Location

A5156/A534 Roundabout, Holt Road, Wrexham

Date

May 2021

Project Reference

S21.161

Client

EG Group

Product of

Asbri Planning Limited

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Introduction

- 1.1 This Sequential Assessment has been prepared on behalf of EG Group Limited to accompany a full application for the 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, Wrexham.
- 1.2 The proposed development relates to out of centre retail development, as such, Policy S3 (Non-shopping Key Town Centre Uses) requires a sequential test to demonstrate that there are no more central, or sequentially preferable sites that comprise available, suitable and viable alternatives to the application site. Accordingly, a sequential assessment of Wrexham Town Centre has been undertaken.
- 1.3 It is clear that there are no further centres within a reasonable distance of the application site which could be considered alternatives where a sequential assessment request on behalf of the LPA could be justified. Such other centres, a significant distance from the application site, would not be in "competition" to serve the catchment area where there is an identified need (Wrexham) and therefore would not be suitable alternatives for the operator.
- 1.4 In order to provide clarity, the application specifics comprise:
 - 2no. drive thru unit
 - Drive thru lanes
 - 50no. car parking spaces
 - Site area of 0.8 hectares
- 1.5 It is on the basis of the above that the search for alternate sites has been based (albeit allowing for a significant level of flexibility).

Sequential Analysis

Purpose and Application of the Sequential Test

- 2.1 The objective of the sequential test is to locate appropriate, town centre uses within central locations. It is accepted that at a local level, it is priority of the Council to promote retail uses within the various centres throughout the Authority area.
- 2.2 Notwithstanding, the purpose of the sequential test is not simply to justify refusing planning permission for developers seeking to develop sites in non-town centre locations. Alternative sites within central areas must be suitable, viable and available for the proposed development to be considered sequentially preferable.

Legal Precedent

- 2.3 The seminal and established Supreme Court case law example of Tesco Stores Limited v Dundee City Council provides clear guidance to LPA's in respect of the application of the sequential test. It is important to highlight at this point that whilst the Dundee case was a Scottish case the Supreme Court's decision applies in Wales. This has been confirmed in the recent Secretary of State decision in Rushden Lakes (see below).
- 2.4 The decision is helpful in understanding the realism with which Local Authorities should consider sequential assessments. It is also useful in discussing the application of planning policy by LPA's.
- 2.5 The court held that interpretation of policy was a matter of law, not a matter of judgment, professional or otherwise. Previously the position was that, in effect, provided that the interpretation put on a policy by the decision-maker was not unreasonable, the court would not second guess that approach.
- 2.6 In Paragraph 38, Lord Hope provided important guidance as to the interpretation and indeed application of the sequential test:

"Here too the context indicates that the issue of suitability is directed to the developer's proposals, not some alternative scheme which might be suggested by the planning authority. I do not think that this is in the least surprising, as developments of this kind are generated by the developer's assessment of the market that he seeks to serve. If they do not meet the sequential approach criteria, bearing in mind the need for flexibility and realism to which Lord Reed refers in para 28, above, they will be rejected. But these criteria are designed for use in the real world in which developers wish to operate, not some artificial world in which they have no interest doing so."

- 2.7 The Tesco v Dundee decision has been reinforced by the Zurich Assurance Limited v North Lincolnshire Council (20 December 2012). The focus of the Appeal was the requirement for LPA's to assess the sequential test within the boundaries of commercial realities. To that end, the decision states:

"It is also important to mark that developers, and planning authorities, work in the real world. Marks & Spencer had assessed the only available town centre alternative to the site, and had concluded that a development that was smaller than that proposed, or one with a more restricted range of goods, was neither commercially viable nor suitable for their requirements."

- 2.8 The Scunthorpe (TJ Hughes / M&S) judgement is also helpful in respect of viability. Indeed, para 60 of the decision states:

"In my judgment, it is simply incorrect to say that there was no evidence before the officer and committee that (i) the T J Hughes unit was too small to create an economically viable Marks & Spencer food and non-food store, or (ii) it was not economically viable to split the operation into two parts, one of which might be housed in the T J Hughes unit. The evidence was that Marks & Spencer had considered the T J Hughes unit, and in their opinion they could not use that unit (or, indeed, any unit in Scunthorpe town centre) for an economically viable operation. For that reason, they had no interest in any available site other than the Site, as the representative at the hearing made clear. That was evidence that the committee could properly take into account. It is unrealistic to expect a commercial operator to reveal its precise commercially sensitive and valuable calculations as to why it considers possible alternatives to the development proposal not to be commercially viable; and it is unnecessary for them to do so to enable a planning authority to come to a view on viability."

- 2.9 A further notable decision in the context of the sequential test comprises a Secretary of State decision to uphold and Inspectors recommendation to allow the erection of a mixed use scheme at Rushden Lakes (ref. APP/G2815/V/12/2190175). Paragraph 2.64 is key in respect of the level of flexibility which must be shown as part of the sequential test:

"...in terms of the size of the alternative site, provided that the Applicant has demonstrated flexibility with regards to format and scale, the question is whether the alternative site is suitable for the proposed development, not whether the proposed development could be altered or reduced so that it can be made to fit the alternative site."

- 2.10 Paragraph 2.68 identifies that the consideration of disaggregation of specific elements of schemes as part of a sequential assessment is not reasonable:

"There is no longer any such requirement stated in the NPPF...Had the Government intended to retain disaggregation as a requirement it would and should have explicitly stated this in the NPPF. It is too large a point to rest on implication. If it had been intended to carry on with the requirement then all that would have been required is the addition of the word "disaggregation" at the end of NPPF [24]."

- 2.11 Finally, at paragraph 8.55, the Rushden decision also provides guidance on when a site can be considered "available":

"In terms of availability, NPPF [24] simply asks whether town centre or edge of centre sites are "available". It does not ask whether such sites are likely to become available during the remainder of the plan period or over a period of some years. NBC has previously adopted the same interpretation of "available" as LXB do. Mr Lewin accepted that in the Committee report (24 July 2012) in relation to an application to redevelop the Royal Mail site at Barrack Road for a 5,000+ sq m Tesco superstore, the Council rejected Legal & General's objection that availability should have been looked at over a longer time frame. The site was not currently available and that was what was required by the sequential test."

- 2.12 Accordingly, any sequential assessment must be undertaken on a flexible basis, both on the side of the LPA and the developer and mindful of relevant case law examples.

- 2.13 It is unrealistic to suggest that the need for the proposed development could be met by disaggregating elements of the scheme across several sites. All that would result, were it ever to be commercially viable (which in our professional experience it would not), is a series of small-scale developments at various locations, both inside and out of centre that poorly relate to each other and the overall planning strategy for the regeneration of the town centres. This view is reinforced by relevant case law examples.
- 2.14 In addition, clarity on what enables a site to be considered available is also provided.

Drive Thru Appeal Decisions

- 2.15 Of relevance to the proposed development, Appeal Case - APP/00830/A/05/1182303 discusses the suitability of drive thru facilities within City Centre locations. In his concluding comments, the Inspector confirmed:

"It is difficult to envisage how a developer could be flexible in respect of the format of a drive thru restaurant. Unlike a conventional restaurant, which could be easily accommodated on any of the identified sites, a drive thru, by definition, requires vehicular access and circulation through and around the building."

- 2.16 In addition, Appeal decision APP/Q1255/A/08/2061585 clearly reinforces the findings of the above Appeal in respect of the limited flexibility which can be shown by drive thru operations as part of a sequential assessment.

Future Wales: The National Plan 2040

- 2.17 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.
- 2.18 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

- 2.19 National planning policy is contained within the 11th edition of Planning Policy Wales (PPW), published by the Welsh Government in February 2021. It constitutes guidance for Local Planning Authorities (LPAs) and decision-makers and sets out the Government's planning policies for Wales and how these are expected to be applied.

- 2.20 In regard to Sequential Assessments, paragraph 4.3.18 of PPW acknowledges that the Welsh Government operates a 'town centres first' policy in relation to the location of new retail and commercial centre development. However, paragraph 4.3.19 recognises that:

"If a suitable site or building to meet identified need is not available within a retail and commercial centre or centres, then consideration should be given to edge of centre sites and if no such sites are suitable or available, only then should out-of-centre sites in locations that are accessible by a choice of travel modes, including active travel and public transport, be considered. Developers should demonstrate that all potential retail and commercial centre options, and then edge-of-centre options, have been thoroughly assessed using the sequential approach before out-of-centre sites are considered. The onus of proof that central sites have been thoroughly assessed rests with the developer."

- 2.21 Furthermore, paragraph 4.2.20 stipulates that out of centre sites should be accessible by a choice of public and private modes of travel and that development in these locations should not be of a scale, type or location likely to undermine the vibrancy, attractiveness and viability of existing retail and commercial centres.

Location of Application Site

- 2.22 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. The site adjoins the consented Petrol Filling Station immediately to the west.

- 2.23 A review of the adopted Unitary Development Plan's proposals map reveals that the site lies outside of, albeit within close proximity to the settlement boundary for Wrexham and within a Green Barrier. As aforementioned, the site lies outside of a defined retail centre, therefore Policy S3 (Non-shopping Key Town Centre Uses) which states:

"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."

- 2.24 In accordance with the requirements of Policy S3, an assessment has been undertaken to demonstrate that there are no sites suitable, available and viable and which are in sequentially preferable locations within or on the edge of Wrexham Centre to accommodate the proposed development.

- 2.25 A sequential assessment of Wrexham Town Centre has therefore been undertaken. The centre lies approximately 2.46km southwest of the site. It is therefore considered that the site lies in a separate

catchment area to the Town Centre given the distance between the two. Notwithstanding, an assessment has been undertaken to satisfy the requirement of Policy S3. The other nearest centres to the site are as follows:

- Gresford/Marford (3km from site)
- Gwersyllt (4.24km from site)
- Coedpoeth (7.5km from site)
- Johnstown (8km from site)

2.26 Given the distances of other centres from the site, Wrexham Town Centre is the only town centre to be considered relevant to the proposal.

2.27 It is clear that the other centres identified above are not within a reasonable distance of the application site so as to be able to be considered alternatives in respect of the sequential test. Were the proposed development to be relocated to them, the unit would be serving a separate catchment area for which there may not be an identified need for a drive thru unit. Therefore, they would not comprise suitable alternatives for the operator who has a requirement within the vicinity of the site. As above, Wrexham Town Centre itself is considered to serve a separate catchment area. Notwithstanding, an assessment has been undertaken however to satisfy the requirement of Policy S3.

2.28 In accordance with the above and planning policy at a local and national level, we have assessed the above centre both in respect of existing opportunities (i.e. vacancies) and development opportunities.

Sequential Assessment

2.29 In this section, we present the results of our sequential assessment. The following general observations set the context for the assessment:

- This sequential test has been undertaken to demonstrate that there are no sequentially preferable sites within the existing centres in accordance with Policy S3 (Non-shopping Key Town Centre Uses) of the adopted Unitary Development Plan.
- The proposal relates to the development of two drive thru units for which the intended operators have an identified need.
- The site is strategically located in order to make use of high vehicular trips with immediate access a wide highway network including the A5, A55, A543 and M6. It is an ideal location for the intended facility.
- The drive thru lane elements of the proposed development is considered essential to the overall viability of the proposed development. Such a consideration is based on EG Group's market leading international experience in operating such outlets.
- The development of the 2no. drive thru units will be linked with the approved PFS to provide ancillary uses to the primary operation of the wider site.
- The application proposes the development of a 2no. drive thru unit and associated development which will result in the creation of circa 40-50 jobs.
- The site is located approximately 2.46km away from Wrexham Town Centre. It is therefore considered that the site lies in a separate catchment area and will not draw trade away from the Centre.

- It is the intention for the units to be occupied by national multiple operators under the EG Group banner. It is therefore not speculative in nature and the economic benefits including job creation can be delivered immediately upon receipt of a satisfactory planning permission.

Application Specifics

2.30 A fundamental element of any sequential assessment is to set the parameters under which the assessment should be undertaken. To that end, the specifics of the application to which this statement relates are key. These comprise:

- Site area of 0.80ha / 8,000 sqm
- Development scheme comprising:
 - 2no. Drive Thru unit
 - Drive thru lanes
 - 50 no. car parking spaces
 - Landscaping

2.31 In order to evidence that the sequential test has been undertaken in a correct manner, it is important to show flexibility in respect of the size of the site search. To that end, the assessment of alternate sites within the relevant centre will be based upon sites that fall within 75% of the scale of the application site.

2.32 In accordance with the above, and to provide clarity, **our search has been undertaken on sites of 0.60 Ha / 6,000 sqm and above** (i.e. a 25% reduction in scale when compared to the application site). It is clear that in setting the level of flexibility at 25%, the applicant is willing to show a level in excess of that compared to a traditional approach to the sequential test.

Wrexham Town Centre

2.33 Wrexham Town Centre is a large centre concentrated along Regent Street, Hope Street, Lord Street, Queen Street and Chester Street which form the Principal Shopping Streets in accordance with Policy S1 (Shopping Streets in Wrexham Town Centre) of the adopted UDP. The centre features an array of independent opportunities and national operators including; Iceland, Argos and Primark.

2.34 The centre lies approximately 2.46km southwest of the application site. As such, lies in a separate catchment area to the site. The proposed development will therefore not draw trade from the centre and impact upon its vitality.

2.35 Given that a large portion of Wrexham Town Centre comprising the Primary Shopping Streets is pedestrianised, it is evident that any existing vacancies/development opportunities within such areas would not be suitable to accommodate a drive thru operation. In regards to the areas that are accessible to vehicles, it is clear from our assessment that the roads would not benefit from the vehicular movements which would make it attractive to a national drive thru operator in our experience. It is therefore considered that they would be neither suitable nor viable for such an operation.

2.36 Notwithstanding, we have carried out an assessment of the opportunities as detailed below.

- 2.37 Our survey is based on up to date Experian data and recorded a number of vacancies.
- 2.38 A copy of the survey information of the Shopping Area is provided within **Appendix 1** of the statement and a vacancy table is contained within **Appendix 2**.
- 2.39 All of the existing vacancies within the centre fall well below the required site area to be considered realistic alternatives to the application site. The largest vacancy relates to a unit within Island Green Shopping Centre which measures 1,310m² in extent. It is therefore less than a third of the area required to accommodate the proposed development even when allowing for a 25% reduction in scale.
- 2.40 Accordingly, it is concluded that there are no existing opportunities within the centre that comprise a sequentially preferable option to the application site.

Development Opportunities

- 2.41 In addition to the above, we have also considered the potential for development sites within and on the edge of the Town Centre. Our research and identification of suitable sites has been based upon the following:
- A working knowledge of development opportunities within surrounding area.
 - A review of the UDP Proposals Map and allocations.
- 2.42 The centre is largely bound by residential uses and therefore opportunities for expansion of it or development sites of the scale required are limited. As such, in order to ensure that a robust assessment has been undertaken, the scope of the survey has been extended to areas beyond the Centre which would traditionally not be assessed as they are also in out of centre locations.

Land at Henblas Street

- 2.43 A large area of vacant land lies adjacent to Henblas Street. Upon further assessment, the site measures just 760 sqm. It therefore, falls considerably short of the site area required to accommodate the proposed development even when allowing for a 25% reduction in scale.
- 2.44 Further, Henblas Street is pedestrianised, as such, would evidently not be appropriate for drive thru operations. The site has therefore been discounted from the sequential assessment on the grounds of suitability.

Land at Bridge Street

- 2.45 There is a large vacant portion of land situated outside, albeit within close proximity to the Shopping Area along Bridge Street. The site measures approximately 1,400 sqm in extent, as such, it is not of sufficient extent to accommodate the proposed development even when allowing a 25% reduction in site area. Consequently, the land would not be suitable to accommodate the proposed development.
- 2.46 The land lies immediately adjacent to a Listed Building at the Burton Buildings, 26-30 Bridge Street (CADW Ref: 1764). It is therefore considered that given the location of the site immediately adjacent to the property, its development to accommodate two drive thru units would impact the setting of the listed building. As such, the proposed development would constitute a departure from

paragraph 6.1.10 of PPW and Policy EC9 of the Wrexham Unitary Development Plan which aim to safeguard the setting of Listed Buildings.

- 2.47 The site has therefore been discounted from the sequential assessment on the grounds of suitability.

Bridge Street/Cambrian Yard Regeneration

- 2.48 There exists a large portion of vacant land which lies outside of the Shopping Area to the east and south of Bridge Street and St Giles Way respectively. The site measures approximately 4.73 hectares in extent. It is allocated within the Wrexham UDP for mixed use comprising residential, business development (Class B1) and shopping provision for local needs (Policy H13).

- 2.49 Whilst the site is of sufficient scale and includes retail provision within its allocation, there are a number of considerations which should be taken into account when assessing the suitability of the site to accommodate the proposed development.

- 2.50 It is referred to within the Wrexham Town Centre Masterplan document and is described as a key gateway site into the town centre sitting astride Bridge Street and Giles Way. Given its prominent location it is considered that the land should be brought forward comprehensively in order to enable a notable development. Its development to accommodate two drive thrus as part of a piecemeal approach would not provide the distinct scheme required and would therefore constitute a departure from the Council's aspirations for the site. It could be restrictive and compromise the remainder of the site coming forward and interest in it from developers.

- 2.51 In accordance with the above, the sales particulars reveal that it is being marketed comprehensively. Therefore, it would not be justifiable for EG Group to purchase the entire site provide two drive thru operation for the purposes of the sequential test. The site could therefore be discounted from the sequential assessment on the grounds of availability.

- 2.52 From a heritage perspective the allocation is bound to the south by the Salisbury Park Conservation Area. To the north is Town Centre Conservation Area and beyond St Giles Way is St Giles Parish Church, a Grade I Listed Building (CADW Ref: 1769). Any development will be required to be sympathetic to these historical assets and their settings. Development of two drive thrus which are contemporary in design would constitute a departure from paragraphs 6.1.10 and 6.1.14 of PPW and Policies EC7 and EC9 which aim to safeguard the character, appearance and setting of Conservations Areas and Listed Buildings.

- 2.53 A review of Natural Resources Wales' Development Advice Map reveals that large portions of the site are situated within Flood Zones B and C2. Within Technical Advice Note 15: Development and Flood Risk, Flood Zone B is described as:

"Areas known to have been flooded in the past evidenced by sedimentary deposits"

- 2.54 Whereas Flood Zone C2 is described as:

"Areas of the floodplain without significant flood defence infrastructure"

- 2.55 The site's location in relation to the flood plain is shown on the NRW Development Advice Map Extract below:

Conclusion

- 3.1 This Sequential Assessment is required to accompany a planning application for the 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, Wrexham.
- 3.2 Given that the proposal relates to out of centre retail development, Policy S3 (Non-shopping Key Town Centre Uses) requires a sequential test to demonstrate that there are no more central, or sequentially preferable sites that comprise available, suitable and viable alternatives to the application site. Accordingly, an assessment of Wrexham Town Centre has been undertaken.
- 3.3 The proposal is intrinsically linked with the adjacent PFS and will therefore be ancillary to the main function of the site. The development will therefore draw trade from passing motorists travelling along the adjacent highway infrastructure. In addition, the site lies approximately 2.46km from Wrexham Town Centre and is therefore within a separate catchment area. The proposed development will consequently not draw trade from the designated centre and will not impact upon its vitality and viability. Notwithstanding, a sequential assessment has been undertaken to satisfy Policy S3 of the adopted Unitary Development Plan.
- 3.4 The assessment is comprehensive and investigated both existing vacancies in or on the edge of the centres identified above. In addition, development opportunities are also assessed.
- 3.5 The statement concludes that there are no sequentially preferable units or sites within the search boundaries and that the sequential test has been satisfied.

APPENDIX 1 – WREXHAM TOWN CENTRE SEQUENTIAL TEST MAP

Legend
 Vacant Units



250 metres

Experian Goad Plan Created: 26/05/2021
 Created By: Asbri Planning Limited

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APPENDIX 2– WREXHAM TOWN CENTRE VACANCY TABLE

Selected Outlets for Wrexham

Fascia	Activity	Category	Use Class	Misc Text	Street Number	Road Name	Goad Area_m2
	VAC	VACANT RETAIL/SERVICE	A1		16	CENTRAL ARCADE	10
	UNDER ALTERATION	VACANT RETAIL/SERVICE	A1		6	TOWN HILL	100
	VACANT	VACANT RETAIL/SERVICE	A1		18	KING STREET	100
	VACANT	VACANT RETAIL/SERVICE	A3		2	OVERTON ARCADE	100
	VACANT	VACANT RETAIL/SERVICE	A1		D4 - 5	EAGLES MEADOW , ST GEORGES CRESCENT	100
	VACANT	VACANT RETAIL/SERVICE	A4		32	HOPE STREET	110
	VACANT	VACANT RETAIL/SERVICE	A1		28	KING STREET	110
	VACANT	VACANT RETAIL/SERVICE	A2		1 - 2	HIGH STREET	110
	VACANT	VACANT RETAIL/SERVICE	A1		7	TRINITY STREET	110
	VAC BANK/FIN	VACANT RETAIL/SERVICE	A2		30	HIGH STREET	110
	VACANT	VACANT RETAIL/SERVICE	A1		A3	EAGLES MEADOW	110
	VACANT	VACANT RETAIL/SERVICE	A1		7	HIGH STREET	110
	UNDER ALTERATION	VACANT RETAIL/SERVICE	A1			CHESTER STREET	1190
	VACANT	VACANT RETAIL/SERVICE	A3			MARKET STREET	120
	VACANT	VACANT RETAIL/SERVICE	A1		3	COLLEGE STREET	120
	VACANT	VACANT RETAIL/SERVICE	A1		5	EGERTON STREET	120
	VACANT	VACANT RETAIL/SERVICE	A1		5	QUEEN STREET	120
	VACANT	VACANT RETAIL/SERVICE	A1		11	REGENT STREET	130
	VACANT	VACANT RETAIL/SERVICE	A1		40	BROOK STREET	130
	VACANT	VACANT RETAIL/SERVICE	A1		16	YORKE STREET	130
	VACANT	VACANT RETAIL/SERVICE	A1		43	HOPE STREET	130
	VACANT	VACANT RETAIL/SERVICE	A1			ISLAND GREEN SHOPPING CENTRE, PRIORY STREET	1310
	VACANT	VACANT RETAIL/SERVICE	A1		D8	EAGLES MEADOW	140
	VACANT#BANK/#FINANCIAL	VACANT RETAIL/SERVICE	A2		10	EGERTON STREET	140
	VACANT	VACANT RETAIL/SERVICE	A1		45	KING STREET	140
	VACANT#BANK/#FINANCIAL	VACANT RETAIL/SERVICE	A2		13	LORD STREET	140
	VACANT	VACANT RETAIL/SERVICE	A1		6	QUEEN STREET	140
	VACANT	VACANT RETAIL/SERVICE	A1		2	QUEEN STREET	150
	VACANT#BANK/#FINANCIAL	VACANT RETAIL/SERVICE	A2		43	KING STREET	160
	VACANT	VACANT RETAIL/SERVICE	A1		5	RHOSDDU ROAD	160
	VACANT RESTAURANT	VACANT RETAIL/SERVICE	A3		C7	EAGLES MEADOW	160
	VACANT	VACANT RETAIL/SERVICE	A1		18	REGENT STREET	170
	VACANT	VACANT RETAIL/SERVICE	A1		50 - 52	REGENT STREET	170
	VAC BANK/FIN	VACANT RETAIL/SERVICE	A2		3 - 4	CHESTER STREET	170
	VACANT	VACANT RETAIL/SERVICE	A1		C8	EAGLES MEADOW	170
	VACANT	VACANT RETAIL/SERVICE	A1			EAGLES MEADOW	180
	VACANT	VACANT RETAIL/SERVICE	A1		53 - 54	CHESTER STREET	180
	VACANT	VACANT RETAIL/SERVICE	A1		25	HOPE STREET	180
	VACANT	VACANT RETAIL/SERVICE	A1		5	LORD STREET	180
	VACANT#PUBLIC HOUSE	VACANT RETAIL/SERVICE	A4		11	COLLEGE STREET	190
	VAC	VACANT RETAIL/SERVICE	A1		40	HENBLAS STREET	20
	VAC	VACANT RETAIL/SERVICE	A1		9	OVERTON ARCADE	20
	UNDER ALTERATION	VACANT RETAIL/SERVICE	A1		34	TOWN HILL	200
	UNDER ALTERATION	VACANT RETAIL/SERVICE	A1		14 - 16	REGENT STREET	200
	VACANT	VACANT RETAIL/SERVICE	A1		D16	EAGLES MEADOW	200
	VACANT	VACANT RETAIL/SERVICE	A1		35	HOPE STREET	210
	VACANT BANK/FINANCIAL	VACANT RETAIL/SERVICE	A2		34	CHESTER STREET	220
	UNDER ALTERATION	VACANT RETAIL/SERVICE	A1		1 - 2	HOPE STREET	220
	VACANT	VACANT RETAIL/SERVICE	A1		20 - 21	HOPE STREET	230
	VACANT RESTAURANT	VACANT RETAIL/SERVICE	A3			EAGLES MEADOW	240
	VACANT	VACANT RETAIL/SERVICE	A1		7 - 8	QUEEN STREET	240
	VAC BANK/FIN	VACANT RETAIL/SERVICE	A2		47 - 49	KING STREET	250
	VACANT	VACANT RETAIL/SERVICE	A1		C6	EAGLES MEADOW	260
	VACANT	VACANT RETAIL/SERVICE	A1			ISLAND GREEN SHOPPING CENTRE, WATERY ROAD	260
	VACANT	VACANT RETAIL/SERVICE	A1		7 - 9	RHOSDDU ROAD	270
	VACANT TAKEAWAY	VACANT RETAIL/SERVICE	A5		B3	EAGLES MEADOW	280
	VACANT	VACANT RETAIL/SERVICE	A1		42	REGENT STREET	280
	VAC	VACANT RETAIL/SERVICE	A1		23	HENBLAS STREET	30
	VAC#REST	VACANT RETAIL/SERVICE	A3			TRINITY STREET	30
	VACANT#BANK/#FINANCIAL	VACANT RETAIL/SERVICE	A2		24	TEMPLE ROW	30
	UND#ALTN	VACANT RETAIL/SERVICE	A1		59 - 60	CHESTER STREET	30
	VACANT	VACANT RETAIL/SERVICE	A1		10	HIGH STREET	30
	VACANT	VACANT RETAIL/SERVICE	A1		19	CENTRAL ARCADE	30
	VACANT	VACANT RETAIL/SERVICE	A1		9	HENBLAS STREET	320
	VACANT	VACANT RETAIL/SERVICE	A1		7	HENBLAS STREET	330
	VACANT RESTAURANT	VACANT RETAIL/SERVICE	A3			EAGLES MEADOW	340
	VACANT	VACANT RETAIL/SERVICE	A1		5	PRIORY STREET	340
	VACANT	VACANT RETAIL/SERVICE	A1		63	CHESTER STREET	350
	VACANT	VACANT RETAIL/SERVICE	A1		9	REGENT STREET	350
	VACANT	VACANT RETAIL/SERVICE	A1		4	REGENT STREET	390
	VACANT	VACANT RETAIL/SERVICE	A1		22	CHARLES STREET	40
	VACANT	VACANT RETAIL/SERVICE	A1		1	COLLEGE STREET	40

VACANT	VACANT RETAIL/SERVICE	A1	21	HENBLAS STREET	40
VACANT	VACANT RETAIL/SERVICE	A1	29 - 29A	HENBLAS STREET	40
VAC NRESI	VACANT OTHER BUILDINGS	D1	19	RHOSDDU ROAD	40
VACANT	VACANT RETAIL/SERVICE	A1	11	HENBLAS STREET	400
VACANT	VACANT RETAIL/SERVICE	A1	D10	EAGLES MEADOW	450
VACANT	VACANT RETAIL/SERVICE	A1	D11	EAGLES MEADOW	490
VACANT	VACANT RETAIL/SERVICE	A1	50	HOPE STREET	50
VACANT	VACANT RETAIL/SERVICE	A1	20	CENTRAL ARCADE	50
VACANT	VACANT RETAIL/SERVICE	A1	41	MOUNT STREET	50
VACANT	VACANT RETAIL/SERVICE	A1	3	QUEEN STREET	50
VACANT	VACANT RETAIL/SERVICE	A1	3 - 5	TRINITY STREET	50
VAC	VACANT RETAIL/SERVICE	A2		QUEEN STREET	60
VACANT	VACANT RETAIL/SERVICE	A1		EAGLES MEADOW	60
VACANT#BANK/FINANCIAL	VACANT RETAIL/SERVICE	A2	2	KING STREET	60
VACANT	VACANT RETAIL/SERVICE	A1	C9	EAGLES MEADOW	60
VACANT	VACANT RETAIL/SERVICE	A1	D1	EAGLES MEADOW , ST GEORGES CRESCENT	60
VACANT	VACANT RETAIL/SERVICE	A1	25	LORD STREET	60
VACANT	VACANT RETAIL/SERVICE	A1	5A	TRINITY STREET	60
VACANT	VACANT RETAIL/SERVICE	A1	B1B	EAGLES MEADOW	620
VACANT	VACANT RETAIL/SERVICE	A1	28 - 29	HOPE STREET	640
VACANT	VACANT RETAIL/SERVICE	A1	21	LORD STREET	70
VACANT	VACANT RETAIL/SERVICE	A1	2	CHARLES STREET	70
VACANT	VACANT RETAIL/SERVICE	A1	16	TOWN HILL	70
VAC BANK/FIN	VACANT RETAIL/SERVICE	A2	19	CHESTER STREET	70
VACANT	VACANT RETAIL/SERVICE	A1	30	TOWN HILL	70
VACANT	VACANT RETAIL/SERVICE	A1	D13	EAGLES MEADOW	700
VACANT	VACANT RETAIL/SERVICE	A1	A4	EAGLES MEADOW	80
VACANT PUBLIC HOUSE	VACANT RETAIL/SERVICE	A4		BROOK STREET	820
VAC NRESI	VACANT OTHER BUILDINGS	D1	63	KING STREET	90
VACANT	VACANT RETAIL/SERVICE	A1	6	YORKE STREET	90
VACANT	VACANT RETAIL/SERVICE	A1	D17	EAGLES MEADOW	90
VAC#BANK/FIN	VACANT RETAIL/SERVICE	A2	31	HIGH STREET	90
VACANT	VACANT RETAIL/SERVICE	A1	13	KING STREET	90
VACANT ASG	VACANT RETAIL/SERVICE	ASG	4	QUEEN STREET	90
VACANT	VACANT RETAIL/SERVICE	A1	36	BROOK STREET	90
VACANT	VACANT RETAIL/SERVICE	A1	1	CHARLES STREET	90