

Planning and Retail Statement

Client: Aldi Stores Limited

Property: Land at Home Farm, Gresford Road, Llay

October 2020



Contents

- 1. Introduction 1
- 2. Description of Site and Surrounding Area 4
- 3. The Proposed Development 6
- 4. Pre-Application Advice 13
- 5. Planning Policy Context..... 17
- 6. Retail Planning Considerations 26
- 7. Planning Considerations..... 41
- 8. Conclusions 46

- Appendix 1 - Emerging Wrexham LDP Deposit Map 3
- Appendix 2 – Study Area Map
- Appendix 3 – Household Survey Questionnaire
- Appendix 4 - RIA

1. Introduction

1.1. Introduction

1.1.1. JLL has been instructed by Aldi Stores Limited to resubmit a planning application in support of the erection of a new foodstore and associated development on land at Home Farm, junction of Gresford Road and Straight Mile, Llay. A full planning application (ref: P/2019/0525) was submitted on the site in July 2019 by JLL on behalf of Aldi Stores Ltd. The application was not determined and is therefore ongoing. An appeal (ref: APP/H6955/A/20/3253988) was lodged on 10th June 2020 on the grounds of non-determination by JLL on behalf of Aldi Stores Ltd and is yet to commence. This Planning and Retail Statement sets out the planning policy and material considerations relevant to this proposal.

1.1.2. The proposed development is described on the application form as follows:

‘Erection of a foodstore (Use Class A1), car park, access and landscaping at land at Home Farm, Gresford Road, Llay’.

1.1.3. The planning application is submitted with the intention that the land be developed for a Use Class A1 retail foodstore, which will be occupied by Aldi Stores Limited (‘Aldi’ hereafter). This report therefore includes background information on the retailer, to help understand the specific format and retail use proposed. This background on Aldi as a retailer is considered to be particularly relevant to assessing the proposal against relevant planning policy.

1.1.4. The planning application is accompanied by the following supporting documents:

- Planning Drawings (prepared by The Harris Partnership):
 - Location Plan (ref: 2636NESW-100)
 - Existing Site Plan (ref: 2636NESW-121)
 - Proposed Site Plan (ref: 2636NESW-122)
 - Proposed General Arrangement Plan (ref: 2636NESW-123)
 - Proposed Elevations (ref: 2636NESW-124)
 - Proposed Roof Plan (ref: 2636NESW-125)
 - Proposed Roller Shutter (ref: 2636NESW-126)
 - Proposed Boundary Treatment (ref: 2636NESW-127)
 - Proposed Sub Station (ref: 2636NESW-128)
 - Proposed Fence Elevations (ref: 2636NESW-129)
 - Proposed Fence Sections (ref: 2636NESW-130)
 - Landscape Plan (ref: V2636_L01L)
 - Tree Pit Detail - Soft (ref: V2636 D01A)

- Tree Pit Detail [Car Park Trees - Section A-a] (ref: V2636-D02B)
- Tree Pit Detail [Car Park Trees - Section B-b] (ref: V2636-D03B)
- Proposed Foodstore CGI (ref: 2636NESW CGI01D)
- Proposed Foodstore CGI (ref: 2636NESW CGI02D)
- Proposed Foodstore CGI (ref: 2636NESW CGI03C)
- Proposed Site Plan (ref: 2636NESW V122)
- Proposed Elevations (ref: 2636NESW V124)
- Planning Application Form and Certificates (prepared by JLL);
- Design and Access Statement - 2020 (prepared by The Harris Partnership);
- Transport Assessment - 486-01/TA01 REV A – 2020 (Prepared by Cameron Rose Associates);
- Preliminary Ecology Assessment – 2019 (Prepared by Cambrian Ecology Ltd)
- Phase I Desk Study Assessment Report - 2019 (Prepared by Brownfield Solutions Ltd)
- Phase II Assessment – 2017 (Prepared by REFA)
- Drainage Assessment – 2019 (Prepared by SWF Consulting Ltd)
- Flood Consequence Assessment - 2020 (Prepared by Waterco)
- Noise Assessment – 2019 (Prepared by Spectrum Acoustic Consultants)
- Arboriculture Report – 2019 (Prepared by ACS Consulting)
- Air Quality Assessment - 2019 (Prepared by BWB)
- Pre-Application Consultation Report – October 2020 (Prepared by BECG)
- Welsh Language Statement - 2019 (Prepared by JLL)
- Construction Management Plan – 2020 (Prepared by CTM Management Ltd)
- Tree Protection and Retention (ref: ARB/3926/Y/300)
- Arboriculture Layout (ref: ARB/3926/Y/200C)
- Arboricultural Survey (ref: ARB/3926/Y/100A)
- No dig plan (ref: 2019 A.C.S. 03)
- Spill Lighting Plan (ref: 5551-G-102 A)
- Service Duct Layout (ref: 5551-G-105 A)
- Indicative Utility Infrastructure Drawing (ref: UC-9379-02)

1.2. Structure

1.2.1. This Planning Statement identifies and addresses the issues relevant to the consideration of the application submission, as follows:

- Description of Site and Surrounding Area – describes the physical characteristics of the planning application site and its immediate surroundings.
- Planning History of the Site – sets out the planning history for the site
- Proposed Development – provides a description of the proposed development.
- Pre-application Discussions – Describes the pre-application discussions with officers at Wrexham County Borough Council
- Relevant Planning Policy – describes the planning policies which are relevant to the proposed development.
- Retail Assessment – addresses need, the sequential test and impact assessment.
- Relevant Planning Considerations - provides an assessment of the planning application proposals against the relevant planning policies and material considerations.
- Conclusions - sets out the conclusions of this statement.

2. Description of Site and Surrounding Area

2.1. The Application Site

2.1.1. The planning application site extends to approximately 1.14 ha (2.73 acres) and is located off the B5102 (Straight Mile Road) and the B5373 (Gresford Road), approximately 6.8km (4.2 miles) North of Wrexham town centre. The Site and surrounding context are illustrated on the 'Site Location Plan', which have been submitted to accompany the planning application.

2.2. Site Description

2.2.1. The application site is located within the administrative boundary of Wrexham County Borough Council (WCBC) and situated to the North of Wrexham town centre on the B5102 (Straight Mile Road) which connects with Llay New Road and extends into Wrexham town centre.

2.2.2. The site is irregular in shape and comprises of greenfield land associated with the existing farm, known as 'Home Farm', to the east. The site is grassed and is well managed. A metal fence extends around the perimeter of the site. The fence is exposed along the north west boundary, while the remainder of the boundaries comprise of hedgerows. Mature trees are present along the south and south west boundaries, these are subject to a TPO. During pre-application discussions, the council applied a tree preservation order relating to trees along Gresford Road. The proposal originally included the removal of many of those trees and replacement on site. The applicant redesigned the scheme to retain the trees following the TPO.

2.2.3. The application site is located outside the Llay development boundary and outside the defined town centre and main retail area as defined in the Development Plan. The site is however, identified as falling within the proposed extension to the settlement limit within the Emerging Local Plan proposals map.

2.3. The Surrounding Area

2.3.1. Straight Mile bounds the site to the north east and Gresford Road bounds the site to the south west. The side garden of dwellings associated with Home Farm are located to the south and south east.

2.3.2. To the east of the site is a construction site for new residential development, works began April 2019. The site was until recently farmland. The residential development has planning permission for 362 dwellings and will form an extension to the settlement of Llay.

2.3.3. A large residential estate lies immediately south of the site, across Gresford Road. A local pub ('The Crown') is located to the south west, and beyond this lies Llay Industrial Estate. Open agricultural land is present to the north of the site.

2.4. The Wider Area

2.4.1. The site is within a mixed-use area of residential, agricultural and employment/industrial developments.

2.4.2. To the south of the application site extends the main residential area of Llay, along with an undefined local centre. The centre, located off Fifth Avenue, comprises of a number of small shops and takeaways. A large industrial/commercial area is located to the west of the site, comprising of uses including, Magellan Aerospace, GT Auto Sport, UK Engineering Ltd and Carlton Garden Centre.

2.4.3. There are bus stops available on both sides of Llay Road (approximately 100m south west of the site) and are served by bus routes; 34, PC1 and PC2 which provides services to Caego, Southsea and Llay. Cefn-y-Bedd Train Station is located 2.6km (1.6miles) (5-minute drive away) to the west and provides regular services to Bidston and Wrexham Central Train Station. Wrexham General Train Station is located 7.2km (4.2 miles) south, and provides regular services to Wrexham Central, Bidston, Cardiff, Holyhead and Birmingham International.

2.5. Planning History

2.5.1. A planning history search has been undertaken via a desktop search of Wrexham County Borough Council website.

2.5.2. One Outline permission is present, which extends across the site and the neighbouring land to the east. Planning consent was granted on appeal on 11 January 2017 for the following development (ref: P/2014/0905):

- Outline Application For 365 Dwellings and erection of 300 Square Metre Retail Unit - All Detailed Matters Reserved. At Land at Home Farm Gresford Road Llay Wrexham.
- The wider site includes the 'application site' and extends east across the Home Farm site.
- A Reserved Matters application for the residential element of the scheme was approved in August 2018 and as at 11 March 2019, the works are underway. The approved development (ref: P/2017/1054) is as follows:
 - Application for Approval of Reserved Matters Pursuant to Outline Planning Permission P/2014/0905 - Access, Appearance, Landscaping, Layout and Scale for the Erection of 362 Dwellings on all Phases, including 25% Affordable Housing, Public Open Space, Play Facilities, Associated Works including Surface Water Attenuation Basins and the Erection of Two Sub-Stations. At Land at Home Farm Gresford Road Llay Wrexham.
- The outline consent remains extant and thus, the site benefits from an outline permission which comprises an element of retail space (300 sq.m). As such, the principle of development on the application site has already been accepted, including the principle of retail floorspace.

2.5.3. A full planning application (ref: P/2019/0525) was submitted on the site in July 2019 by JLL on behalf of Aldi Stores Ltd. The application was not determined and is therefore ongoing. An appeal (ref: APP/H6955/A/20/3253988) was lodged on 10th June 2020 on the grounds of non-determination by JLL on behalf of Aldi Stores Ltd and is yet to commence.

3. The Proposed Development

3.1. Proposal

3.1.1. This Planning Statement is submitted to support a full planning application comprising the following:

- A food store (Use Class A1) (1,941 sq. m Gross External Area; 1,858sq. m Gross Internal Area; 1,333 sq. m net sales area) to be operated by Aldi Stores UK Limited;
- Associated car parking facilities comprising 116 dedicated spaces for the proposed foodstore. The car park will include 8no. disabled spaces, 9no. parent and child spaces, 5no. Motorcycle spaces and 4 EVCP spaces;
- 14 Cycle Spaces;
- New site access - off Gresford Road;
- New left in only access - off Straight Mile;
- New pedestrian access routes – off Gresford Road and Straight Mile; and
- Servicing and Landscaping.

3.1.2. The proposed development is described on the application form as follows:

‘Erection of a foodstore (Use Class A1), car park, access and landscaping at Home Farm, Llay’.

3.2. Site Layout



Figure 1 - Proposed Site Layout

3.2.1. The proposed site layout is informed by the design parameters of the site, including the two abutting roads (Gresford Road and Straight Mile), the recently consulted tree preservation order (TPO) and the proximity to the neighbouring residential dwellings.

3.2.2. The proposed positioning of the foodstore allows for maximum visibility from Straight Mile and screening from Gresford Road.

3.2.3. The orientation of the foodstore allows the principal elevations to face the main vistas towards the site whilst pushing the service area away from the general public's view and separate from the main car park. The proposed ALDI provides shop front glazing with an active façade treatment to the principal elevation. The store entrance is located along the western elevation, by way of an internal lobby arrangement beneath the feature canopy, and the shopfront glazing is located along the northern elevations taking advantage of the prominent view of the ALDI foodstore when travelling along Straight Mile and giving customers direction in to the proposed store.

3.2.4. All new Aldi stores within Wales include bi-lingual signage inside the store (such as signage of produce and customer and staff facilities) and within the wider site (such as directional signage and store opening hours).

3.3. Store Design

3.3.1. The majority of properties in the surrounding area, which are predominantly brick built, or industrial units which feature cladding as the primary material. Residential units utilise brick as the primary material. Therefore, a simple palette of materials and crisp contemporary style are proposed to complement the local area by way of introducing a modern addition to the local vernacular and immediate context.

3.3.2. The new Aldi store proposal utilises a combination of charcoal brickwork plinth, anthracite grey and metallic silver cladding, representing qualities of both the nearby retail properties and adjacent residential properties.

3.3.3. Additional details are set out within the Design and Access Statement prepared by the Harris Partnership, which accompanies the application submission.

3.4. Access

3.4.1. Customer and service vehicle access to the development is proposed via a newly formed priority-controlled junction off the B5373 Gresford Road, approximately 135 metres south of the Crown Crossroads.

3.4.2. An additional left in only access is also proposed from the B5102 Straight Mile, approximately 100 metres back from the stop line at the Crown Crossroads. This was introduced following the public consultation due to comments made by the public to reduce any impact on the Crown Crossroads junction.

3.4.3. Once within the site, customers will continue north west to the car park areas. A separate service area for delivery vehicles is provided to the east of the store which provides separation between customers and service vehicles, thus reducing potential conflict. Ample circulation areas for both customers within the car park and delivery vehicles in the service yard have been included to facilitate efficient and safe movement within the site.

3.4.4. In addition to pedestrian access via the main vehicular access, a dedicated access is also proposed off the B5373 Gresford Road, approximately 80 metres to the south of the Crown Crossroads, providing a direct route to the store.

3.4.5. A pedestrian link to the consented residential development to the east of the development site has also been incorporated into the design, on the north eastern boundary of the site.

3.5. Servicing and Deliveries

3.5.1. As detailed above, delivery and service vehicles will access the store via the proposed main access and egress point off Gresford Road and will turn right to enter the service yard.

3.5.2. Typically, Aldi stores receive 3-4 deliveries per day from its regional distribution centre (RDC). These can increase at peak seasonal periods. Deliveries would be carried out during the following hours:

Monday to Sundays: 6am to 11pm.

3.5.3. Further deliveries include a fresh milk delivery each day; and a general waste collection once a week. All other waste is collected by Aldi's vehicles and returned as part of the normal delivery visits each day to reduce vehicle trips and utilise vehicles efficiently.

3.6. Car Park Layout

3.6.1. The proposed Aldi food store will provide 116 parking spaces, including, eight disabled, nine parent and child and five motorcycle spaces. This is a reduction from the original 120 spaces seen at pre-app prior to the 2019 planning application being submitted and followed changes to the car park layout to accommodate the new left in only access off Straight Mile Road.

3.6.2. 117 parking spaces were proposed as part of application reference: P/2019/0525, the reduction to 116 follows a change to the car park layout to accommodate 4 EVCP spaces.

3.6.3. Cycle parking for up to 14 bicycles, in the form of seven "Sheffield" type bicycle stands will be provided adjacent to the store entrance. It is expected that this will promote the use of cycling as a mode of transport by customers and employees of the site.

3.7. Landscaping and Boundary Treatment

3.7.1. A considered landscaping scheme will create a buffer between the development site and adjacent residential properties on Gresford Road

3.7.2. The scheme has been designed to retain the trees following the Council serving a TPO on the majority of the trees along Gresford Road, thus maintaining the linear screen along this boundary. The scheme has also factored in, realignment of the footpath and includes details of no dig areas in regard to root protection areas.

3.7.3. Proposed trees, native species and other landscaping are included to soften the appearance of the car park. Short sections of hedgerows will be removed and replaced within the site. The proposed ornamental shrub planting will provide interest to the site and provide Aldi with a low maintenance landscape proposal.

3.7.4. Materials have been carefully selected to highlight the routes through the car park, in particular, marked pedestrian crossing linking the store entrance. The scheme will have formal landscaping including a quality paved area beneath the entrance canopy which will further emphasise this area on arrival from the pedestrian crossing approaches to the store entrance. The formal entrance into the site is intended to have a scheme wide approach marking the arrival with clear directional signage for the key elements within the site.

3.7.5. Surrounding the majority of the ALDI portion of the site will be the existing hedge that currently defines the boundary without compromising primary vistas. Along the eastern boundary an acoustic fence is proposed to reduce the impact of noise to the neighbouring properties. This will be screened by existing trees and a proposed hedge adjacent to the fence to soften any visual impact.

3.7.6. The existing landscaping results in strong boundaries encompassing the site, this will be retained and made good where necessary. The submitted landscape drawing provides further details.

3.7.7. Following feedback from the Arboricultural Officer, the following amendments have been made to the landscaping scheme:

- At the LPA's request 2 semi mature trees have been included within the car park as mitigation for the loss of 3 trees along Gresford Road.
- Tree Pit details have been produced by Vector and agreed with WCBC arboricultural office. The agreed details are sufficient to ensure the successful growth of these particular narrow growing tree species.
- To address the request for a 'green wall' to the acoustic fencing, the landscape plan has been amended to include a native buffer mix which, in time, would grow to completely cover the fence so that it is no longer visible from the road.
- With regards to extra tree planting along the Gresford Road boundary, Vector set out that there doesn't appear to be much room to include further tree planting along this boundary as the area will be full of existing tree roots and excavating tree pits to squeeze more trees in may disturb the existing root protection areas. Furthermore, the inclusion of more trees along the boundary would reduce the area the trees have to grown and would likely stunt the development of the trees in the long-term.

3.8. Sustainability

3.8.1. Aldi is committed to achieving sustainable development across its estate. The business operates a detailed sustainability plan across all UK development and includes a range of measures including:

- Reducing energy usage
- Applying a heat recovery system within its stores which uses a refrigerant-to-air-heat-exchanger to heat the sales area of each store
- Using sustainable materials and construction methods
- Reducing and managing waste

3.8.2. The proposal will incorporate a heat recovery system to heat the proposed building. In order to minimise energy demand in stores, the appellant seeks to re-use and re-cycle any waste energy where possible. The greatest area to recover energy in the store is the 'Waste Heat' generated by the refrigeration system and this is recovered to heat the proposed building which would otherwise be discharged into the atmosphere. The waste heat is harnessed via a CO² refrigerant lead heat recovery system that rejects the waste heat into a low temperature hot water heating circuit which in turn provides heat to an underfloor heating array. This system provides 100% (115,000 kWh per year) of the total building's heating demand. The heat recovery system has totally removed the need for an independent gas heating system. The underfloor heating system provides heat to the store with a high percentage of radiant heat, minimising the negative affect that the sales floor chillers have on the store heating.

3.8.3. Total energy consumption for a typical store is approximately 270,000 kWh per year. Heating provides approximately 40% of the proposed building's overall energy demand. The combination of reusable and renewable sources, circa 40% of energy, provide an excellent sustainable approach to the operation of the proposed building.

3.9. Design Out Crime

3.9.1. The scheme has been designed with safety and crime prevention in mind. It adopts principles of secure by design wherever possible including:

- There are few areas where criminal activity could occur unobserved.
- Most of the car parking areas are overlooked from the frontage of the building and are readily visible from the surrounding roads, allowing a good level of natural surveillance.
- Cycle parking for customers will be close to the store entrance.
- New lighting columns will be positioned across the site which will have LED lights fitted to give a uniform luminance level to the car park and service area. Lights will be operated by a time clock and photocell override and protected with covers against vandalism.
- Bin stores will be fully enclosed in the bin cage to the service yard for the foodstore.
- Shopping trolleys are controlled on a coin operated system and will be secured at night to prevent theft and misuse.
- Planting and vegetation in vulnerable areas will be kept to a maximum height of 1m.

3.9.2. The Aldi building design also incorporates secure design features:

- Windows will have laminated double-glazed units.
- External security shutters over the entrance/exit doors out of hours.

3.9.3. Doors and windows are manufactured from steel with no visible ironmongery.

- An intruder alarm will be installed.
- The entrance to the store for customers is in an obvious position at the front, facing the car park.
- There are no recesses to the ground floor of the building exterior.
- There are no areas with access to the roof.

3.9.4. Further details are provided in the submitted Design and Access Statement.

3.10. Trading Hours

3.10.1. Aldi's stores trade as follows:

- Monday to Saturdays 8am – 10 pm,
- Sundays 10 am – 6pm, (for a six-hour period)
- Bank Holidays 8am – 8pm (bank holidays are classed as normal trading days and are not restricted to Sunday hours).

3.11. Aldi Store Concept

3.11.1. Aldi offers a modest sized supermarket range primarily selling its high quality, brand-matched products at heavily discounted prices. Awarded the 'Which? Best Supermarket' award for 2012, 2013 and 2015; and 'Best Supermarket' for 2015 at the Retail Industry Awards. Most recently, Aldi has won the Grocer of the Year award at the Grocer Gold 2018 Awards. Aldi has become not only the leading discount operator, but an established presence in the UK market.

3.11.2. The majority of the products on offer are Aldi's exclusive own brands supported by a small range of branded goods. This ensures highly competitive pricing for the customer. Each Aldi store carries the same range of up to 2000 core lines, in stark contrast to a large Tesco or Asda store which will carry in excess of 50,000 at their larger stores. While Aldi's business model is designed for efficiency in order to keep prices low, the quality of the own-brand products is exceptionally high and matched with the best brands. This is highlighted by the number of awards Aldi has received in recent years from established sources such as The Grocer, the Quality Food Awards, the Retail Industry Awards and the International Wine and Spirits Challenge.

3.11.3. Aldi does not provide a 'one-stop-shop' – with no facilities such as an in-store butchers, pharmacy, fishmonger or provision of tobacco products and stamps – and thus encourages linked trips with existing facilities. Rather than harm local trade, as the introduction of a large format supermarket operator may do, Aldi can promote the use of local businesses, keeping shoppers spend in the local area and promoting sustainable shopping patterns rather than travelling further afield. A representation of Aldi's offer is set out below:

- Selection of fresh seasonal fruit and vegetable lines;
- Limited range of exclusively own label tinned, bottled and pre-packed groceries;
- Chilled and frozen products;
- "Specially Selected" range which offers premier quality, luxury foods hand-picked from around the world;
- Own label beers, wines and spirits;
- Pre-packed bread, morning goods and cakes;
- Everyday non-food household items e.g. toiletries and cleaning items;
- Special purchase products, twice weekly, non-food, limited availability, within the categories of textiles, leisure goods, electronics, DIY and home improvements.

3.12. Job Creation

3.12.1. The development of an Aldi foodstore will typically create up to 40 jobs comprising full time and part time positions. A range of roles are required in Aldi's stores including store managers, store assistants, caretakers and warehouse staff. Aldi provides a successful and highly regarded apprenticeship scheme and graduate scheme which provide extensive opportunities. As more stores open, Aldi is required to recruit and train additional area managers and distribution staff including delivery drivers and logistics staff. Thus, the benefits of a new store are significant to a local area and to the region.

3.12.2. Furthermore, Aldi pays above average wages at all levels within the retail sector and has introduced a new minimum rate for all UK staff which is higher than the national living wage. Aldi employees are the highest-paid compared with other national convenience retailers.

3.12.3. Additional employment opportunities will also be created for the local area through employment of local contractors and labour during the construction stage, plus further employment opportunities for ongoing maintenance of the site and landscaping.

4. Pre-Application Advice

4.1.1. A pre-application meeting was held on 31 January 2019 at the offices of Wrexham County Borough Council with Local Planning representatives to discuss the development, following which the council provided formal written pre-application advice on 22 February 2019.

4.1.2. The validation requirements for the full planning application were agreed as follows:

- Full Planning Application Forms;
- Drawings;
- Noise Assessment;
- Air Quality Assessment;
- Retail Impact Assessment;
- Planning Statement;
- Design and Access Statement;
- Transport Assessment;
- Stage 1 Safety Audit;
- Swept Path Analysis;
- Construction Management Plan;
- Arboricultural Survey including Impact Assessment;
- Great Crested Newt Mitigation;
- Bat Activity Survey and Roosting Assessments;
- Hard and Soft Landscaping Scheme;
- Flood Consequence Assessment;
- Phase I Site Investigation Report and Coal Mining Report;
- Phase II Site Investigation Report;
- Welsh Language Statement; and
- Statement of Community Involvement.

4.1.3. At the meeting, the background and reasoning behind Aldi's decision to seek alternate permission in Llay was explained. Officers advised that they were comfortable with the principle of the development, subject to the key retail policy tests of Need, Sequential Test and Impact being addressed within the application submission.

4.1.4. Within the meeting it was discussed that the emerging Local Plan Map 3 (see appendix 1) identifies the application site and the greenfield land to the east (residential development) are proposed to be included within

the Llay settlement boundary on account of an extension to the existing settlement limit which currently ends at Gresford Road. The residential scheme is the first part of the extension of the settlement limit. The proposed development will help improve the linkages and relationship of the site with the built area of Llay, provide a community facility and deliver sustainable development.

4.1.5. In terms of the design the Local Planning Authority considered that the design of the building, the materials and the colour pallet are appropriate.

4.1.6. In terms of residential amenity, A Noise Assessment and Air Quality Assessment would be required to be submitted as part of any formal planning application given the proximity of the site to neighbouring properties.

4.1.7. In terms of the scheme it was highlighted that it should include a landscape scheme, which shows the planting of new native trees on the site to compensate for previously felled trees and to improve the visual appearance of the site.

4.1.8. During pre-application discussions, the council applied a tree preservation order relating to trees along Gresford Road. The proposal originally included the removal of many of those trees and replacement on site. The application redesigned the scheme to retain the trees following the TPO. The scheme has also factored in redesign of the proposed car park, realignment of the footpath and includes details of no dig areas in regard to root protection areas. The applicant has liaised with the Council's tree, highways and planning officer to ensure that the trees are retained, and the proposal can be implemented appropriately and operate in regard to site access, pedestrian routes, car park configuration etc.

4.1.9. In relation to Flooding and Drainage issues, the Local Planning Authority required an FCA to be submitted with application, as the site lies entirely within a C2 floodzone. It was also advised that the application will have to gain consent from the SUDS Approving Body (SAB), therefore, the submitted FCA takes into consideration the implementation of Sustainable Urban Drainage Systems (SUDS).

4.1.10. Wrexham Council officers advised to undertake ecology surveys and contact the Council's biodiversity team to ensure the proposed development would not impact on nesting birds or any other protected species.

4.1.11. In terms of transportation matters, the Council advised that the proposed parking density was acceptable and provided a number of recommendations with regards to traffic arrangements, pedestrian access and scope for the Transport Assessment.

4.2. Statutory Pre-Application Consultation

Background

4.2.1. A Pre-Application Consultation (PAC) took place between 4 June 2019 and 1 July 2019 and following that an application was submitted.

4.2.2. The statutory PAC has not been repeated for this submission as the proposal is almost identical, with no substantial changes. Therefore, we have submitted the PAC report dated October 2019 as summarised below.

4.2.3. This approach has been discussed with the LPA who have agreed and confirmed that there is no requirement to repeat the exercise given there are no substantial changes and that the original PAC process and Report are acceptable to validate this planning application.

Pre-Application Consultation 2019

4.2.4. As set out above, a 28-day pre-application period ran from 4 June 2019 to 1 July 2019. Comments were received from the below parties:

- Llay Community Council;
- Wrexham Borough Council Highways Maintenance Standards and Frequencies;
- Welsh Ministers (North & Mid Wales Trunk Road Agency);
- Wrexham Borough Council Enforcement Officer;
- Wrexham Borough Council Development Planning Advisor; and
- Arboricultural Officer (Planning).

4.2.5. The following section sets out how these responses have been addressed within the submission.

Llay Community Council Response

4.2.6. A letter dated 28 June 2019 was sent via email from Llay Community Council setting out three observations. Below sets out how we have addressed the three points:

Point 1

4.2.7. With regard to point 1 (concerns regarding the road junction) a Transport Assessment has been undertaken for the scheme which concludes that the impacts of residual trips from the proposed development have been assessed and it is evident that these would not have a material impact on the operational performance and safety of the local highway network. Furthermore, the scheme has also been updated to comprise a second access only point off Straight Mile to ease congestion on Gresford Road.

Point 2

4.2.8. With regard to point 2 (location of refrigeration/cooling units, a noise assessment has been undertaken for the scheme incorporating the proposed plant works in this location. Due to the noise output of the plant works, mitigation measures have been provided by way of acoustic barriers to the service yard to reduce noise levels and, the store itself also acts as an acoustic barrier. The plant location cannot be altered from this location as it is a requirement not to be customer facing. If the plant was located on the Eastern elevation this would be closer to the new housing development and the existing houses.

Point 3

4.2.9. With regards to point 3 (size of the proposed store) it is important to note that the 300sqm retail unit was approved as part of a separate outline application (ref: P/2014/0905). The proposed Aldi store forms a fresh planning application which has been fully assessed against local planning policy. In this regard, the retail assessment included within Section X of this Statement concludes that there is a need for the proposed development, both in quantitative and qualitative terms, that there are no available and suitable sequentially preferable sites and that it will not result in detrimental consequences on Wrexham Town Centre, Gwersyllt District Centre or Llay Local Centre.

Specialist Consultee Responses

The following Statutory Consultees responded during the pre-application consultation period (see appendix X for their full responses). The following section sets out how the points raised have been addressed.

Wrexham Highways Department

4.2.10. The Response received from Wrexham Council's Highways department raised a number of points, all of which have been addressed in detail within the supporting Transport Assessment prepared by Cameron Rose Associates.

Welsh Ministers (North & Mid Wales Trunk Road Agency)

4.2.11. The North & Mid Wales Trunk Road Agency set out the following comment:

'In principal we should have no concerns with the development but at full planning will require a Transport Assessment to demonstrate the effect the traffic associated with the store will have on Junction 7 of the A483. These figures should be presented as annual average daily traffic (AADT) and AM and PM peak flows'.

4.2.12. A Transport Assessment has been prepared by Cameron Rose Associates in support of this proposal which provides the requested information and overall sets out that the impacts of residual trips from the proposed development have been assessed and it is evident that these would not have a material impact on the operational performance and safety of the local highway network.

Enforcement Officer

4.2.13. The Enforcement Officer set out the following comment:

'Works times listed in section 2 are in the main accepted but I recommend that Saturday works being restricted to 08:00 to 14:00 for the protection of amenity from nuisance'.

4.2.14. The Construction Management Plan has been updated to address the request to restrict Saturday works hours to 08:00 to 14:00 for the protection of amenity from nuisance.

5. Planning Policy Context

5.1. Introduction

5.1.1. When determining any planning application, the relevant authorities (in this case Wrexham County Borough Council) are under a statutory obligation as imposed by section 54A of the Town and Country Planning Act, repeated in Section 38(6) of the Planning and Compulsory Purchase Act 2004, to make their determination in accordance with the development plan, unless material considerations indicate otherwise.

5.1.2. In this instance the relevant development plan comprises the Wrexham Unitary Development Plan (UDP), adopted 14th February 2005. The Development Plan is supported by a range of Supplementary Planning Guidance adopted Wrexham County Borough Council. Planning Policy Wales (PPW) and the relevant Technical Advice Notes (TANs) are also a material consideration.

5.2. The Development Plan

Wrexham County Borough Council Unitary Development Plan (1996 – 2011)

5.2.1. The Wrexham Unitary Development Plan was formally adopted on 14 February 2005 and outlines the strategic planning policy covering the planning authority area. The document includes broad development management policies, outlines strategic locations for development, specific strategic sites and safeguarded land.

5.2.2. The following policies are considered relevant to the application:

5.2.3. Policy PS1 sets out that new development for housing, employment, and community services will be directed to within defined settlement limits/employment areas.

5.2.4. Policy PS2 sets out that development must not materially detrimentally affect the countryside, landscape/townscape character, open space, or the quality of the natural environment.

5.2.5. Policy PS3 states that development should use previously developed brownfield land comprising vacant or derelict land in preference to the use of greenfield land, wherever possible, particularly so where greenfield land is ecological, landscape or amenity value, or comprises agricultural land of grades 1, 2 or 3a quality.

5.2.6. Policy PS4 states that development should maintain the existing settlement pattern and character and be integrated with the existing transport network to help reduce the overall need to travel and encourage the use of alternative to the car.

5.2.7. Policy PS7 sets out that the priority areas for new shopping development will be the defined Wrexham Town Centre and district centre shopping areas.

5.2.8. Policy GDP1 sets out that all new development should:

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

- Ensure safe and convenient pedestrian and vehicular access to and from development sites, both on sites and in the nearby locality.
- 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.
- Ensure the safety and amenity of the public and safeguard the environment from adverse effect of pollution of water, land or air, hazards from industry and quarrying, and associated noise, odour or vibration arising from development.

5.2.9. Policy EC4 'Hedgerows, Trees and Woodland' states that development proposals should provide for the conservation and management of hedgerows, trees and 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.

5.2.10. Policy EC12 'Development and Flood Risk' sets out that development (including the raising of land) within defined flood plains will only be permitted if it:

- Would not be subject to an unacceptable risk of flooding on-site; and/or
- Does not result in an unacceptable risk of flooding on or off-site; and/or
- Does not adversely affect flood management or maintenance schemes.

5.2.11. Policy EC13 'Surface Water Run-off' states that development which would result in an unacceptable adverse impact on the water environment due to additional surface water run-off will not be permitted.

5.2.12. Policy S2 sets out that 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.

5.2.13. Policy S4 'Large-Scale Retail Development' sets out that this kind of development will be located within the Shopping Area of Wrexham Town Centre and within District Centres. Where a need is identified for large-scale retail development and it is demonstrated that there is no site available with Wrexham Town Centre Shopping Area or within District Shopping Centres, then a sequential approach to site selection will be taken. Policy S4 goes on to state that, in considering both edge-of-centre and out-of-centre sites, development should:

- Where possible, use vacant, underused or derelict land, buildings suitable for conversion; and
- Be accessible by a choice of transport and does not give rise to serious traffic congestion or road safety problems on local highways that cannot be addressed.

5.2.14. Policy S7 'Retail Sales in the Countryside' sets out that retail outlets in the countryside, preferably achieved by the conversion and/or use of suitable buildings will be permitted providing:

- They primarily sell goods or produce predominantly made or grown on the premises; and
- Proposals accord with Policy GDP1; and
- The sales floor area does not exceed 50 square metres.

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

- The availability of public transport nearby.
- Proximity to public car parking,
- Proximity to local services and facilities,
- Road safety hazards and amenity considerations arising from on-street parking in the vicinity of the site.

5.2.16. Where implementation difficulties arise in making parking provision on-site or nearby, the Council will require a developer to make financial contributions for measures to assist public transport or walking and cycling as appropriate.

5.2.17. Policy T9 'Walking, Cycling and Horse-Riding Routes' states that development proposals will be required to provide walking and cycling routes, where feasible and appropriate, that link with existing or proposed walking and cycling routes, and integrate with the public transport system. Opportunities for horse riding along these routes will be secured where appropriate.

5.3. National Planning Policy and Guidance

Planning Policy Wales (PPW) (Edition 10, December 2018)

5.3.1. Planning Policy Wales (PPW) sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs) Welsh Government Circulars, and policy clarification letters, which together with PPW provide the national policy framework for Wales.

5.3.2. The PPW sets out (paragraph 12) that the primary objective of planning is to contribute towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the wellbeing of Future Generations (Wales) Act 2015 and other key legislations.

5.3.3. Paragraph 1.11 highlights that the principles of sustainable development have been at the heart of planning policy since PPW was first published in 2002. However, the concept has been expanded under the Well-being Act and it requires an improvement in the delivery of all four aspects of well-being: social, economic, environmental and cultural'.

5.3.4. Paragraph 1.14 states:

'In order to demonstrate that appropriate consideration has been given to the Well-being goals and sustainable development principle in the decision-making process, public bodies are required to have regard to the 'five ways of working' contained in the Well-being Act. These require consideration of: involvement; collaboration; integration; prevention; and long-term factors'.

5.3.5. Paragraph 2.12 sets out the 5 key principles that should underpin the guiding vision for all development plans. The following principles support the culture change needed to embrace placemaking and ensure that planning facilitates the right development in the right place:

- Growing our economy in a sustainable manner
- Making best use of resources
- Facilitating accessible and healthy environments

- Creating & sustaining communities
- Maximising environmental protection and limiting environmental impact.

Greenfield Land

5.3.6. Paragraph 3.40 notes that where there is a need for sites, but it has been clearly demonstrated that there are no previously developed land or underutilised sites (within the authority or neighbouring authorities), consideration should then be given to suitable and sustainable greenfield sites within or on the edge of settlements.

Retail

5.3.7. National policies that will be considered are set out in Planning Policy Wales (PPW) (Edition 10, December 2018) along with the relevant Technical Advice Notes (TAN 4 'Retail and Commercial Development' November 2016).

5.3.8. For major new retail proposals, local planning authorities should consider not only the incremental effects of that proposal, but also the likely cumulative effects of recently completed development, together with outstanding planning permissions and development plan commitments, in the catchment areas of defined retail and commercial centres.

5.3.9. The PPW states that the three tests of retail need, sequentially preferable sites and retail impact may apply to new retail developments.

5.3.10. TAN 4 'Retail and Commercial Development' (November 2016) should be read in conjunction with PPW. Paragraph 6 notes that the test of retail need is the starting point for planning for new retail development and requires any application relating to an out-of-centre location which is not in accordance with an adopted development plan, to consider need.

5.3.11. Within TAN 4 'Retail and Commercial Development' the sequential location of development plan allocations or planning application should be considered in the following order:

- Firstly, within retail and commercial centres.
- If no suitable sites are available in retail and commercial centres then edge-of centre locations should be considered, with preference given to brownfield sites that are well connected to the existing centre and accessible by a variety of means of transport.
- Only when retail and commercial centres and edge of centre locations have been considered and found to be unsuitable can out-of-centre options within, and outside, a settlement are to be considered. Preference to brownfield out-of-centre sites should be given, which are or will be served by a choice of means of transport and are close to established retail and commercial centre.

5.3.12. With regard to suitability, where a developer favours a development on the edge or outside a retail centre, evidence will need to be provided to explain why potential sites or building within the centre are unable to accommodate the format, scale and design of a proposed development. Retailers should be flexible and innovative about the format, design and scale of the proposed development and the amount of car parking needed.

5.3.13. The TAN guidance for retail development requires retail development over 2,500 sqm gross floorspace to be supported by an impact assessment. However smaller retail planning applications may also be assessed where local planning authorities believe it will have a significant impact on a retail and commercial centre.

5.3.14. TAN 4 advises that in addition to the need and sequential tests, planning applications for retail development outside a retail centre that are not in accordance within the development plan should be assessed against a range of impact criteria, including:

- Impact of the proposal on existing, committed and planned public and private investment in a centre or centre in the catchment area.
- Impact of the proposal on centre vitality and viability, including local consumer choice and range and quality of the comparison and convenience retail offer.
- Consideration of the cumulative effects of the development proposal in relation to any outstanding planning permissions.
- The impact of the proposal on allocated sites outside centres being developed in accordance with the development plan.
- Impact of the proposal on in centre trade and turnover in the centre and other centres in the wider area, taking account of current and future consumer expenditure capacity in the catchment area.
- Assessment of the proportion of customers using the development travelling by different modes of transport.
- Impact on travel patterns over the catchment area.
- Any significant environmental impacts.

Employment

5.3.15. Planning Policy Wales, paragraph 5.4.4 notes that local planning authorities should encourage and support developments which generate economic property and regeneration. Technical Advice Note 23 'Economic Development' notes that local planning authorities should apply judgement depending on the nature of the economic use and its applicability to a particular location. They should give first preference to sites within the boundaries of settlements (including planned new settlements and urban extensions). As a second preference, they should consider edge-of-settlement sites. As a third preference, they should consider identifying land in the open countryside.

5.4. Other Material Considerations

Emerging Local Plan

5.4.1. Wrexham Country Borough Council is preparing the Local Development Plan (LDP) which will replace the current adopted Unitary Development Plan.

5.4.2. Following the decision of the Full Council Meeting on 22nd November 2018, the Local Development Plan was submitted to the Welsh Government for independent examination. Wrexham County Borough Council has since considered all representations received in relation to the Deposit LDP and is now proposing Focussed Changes to ensure that the LDP is sound. These changes were subject to a formal 6 week public consultation which was held between Monday 7th January and Monday 18th February 2019. Examination hearing sessions took place between 3rd September and 11 October 2019. Three further hearing sessions were scheduled between 25th February and 12th March 2020 relating to the following matters, Gypsy & Traveller, Housing and Other Housing Matters. The Inspectors

suspended the Examination for the period from Monday 1 June 2020 to Monday 31 August 2020 and set out that the Inspectors' Report will be submitted to the Authority by December 2020.

5.4.3. The following emerging policies are considered to be of relevance to this application:

5.4.4. Policy SP2 sets out that new development is directed to the defined settlement limits and employment areas as identified on the Proposals Map.

5.4.5. Policy SP6 sets out that planning obligations will be sought to mitigate any impacts directly related to the development and will be assessed on a case by case basis in line with relevant planning legislation.

5.4.6. Policy SP12 sets out that Wrexham's transport network will be developed in a safe, efficient and sustainable manner through the following measures:

- i) Restricting development that would have an unacceptable impact on the safe and efficient operation of the transport network,
- ii) Implement key transport projects identified in the Joint North Wales Local Transport Plan and supporting the development and delivery of key strategic road and rail transport improvement projects promoted by the North Wales region and Welsh Government (policy T4 and T6),
- iii) Enhance the overall reliance of the network and take steps to adapt the transport network to the effects of climate change,
- iv) Improve the coverage, service frequency, integration and priority of public transport services to provide a sustainable and viable alternative travel choice to the private car,
- v) Improved integration of modes through the development of existing and new transport interchanges ensuring infrastructure provisions is accessible to all,
- vi) Ensure adequate levels of car parking taking into consideration the location and accessibility of new developments to existing public transport facilities and walking and cycling network,
- vii) Develop the coverage of the Active Travel Network across Wrexham to promote increased use of walking and cycling as safe, viable and sustainable alternatives to the car,
- viii) Deliver capacity and safety enhancements to the local highway network where considered appropriate to facilitate existing and forecast traffic demands,

5.4.7. Policy SP13 sets out the design principles and notes that new developments will be required to be of a high quality, sustainable design which makes a positive contribution to the creation of locally distinctive places by ensuring compliance with the masterplanning framework and the KSS schematics. Proposals must demonstrate how they have taken account of the local characteristics of surrounding areas and how innovative design solutions will enhance the quality of the built environment.

5.4.8. Policy SP19 sets out that to mitigate against the effects of climate change and adapt to its impacts, development proposals will need to demonstrate that they have taken into account the following:

- i) Reducing carbon emissions;
- ii) Protecting and increasing carbon sinks
- iii) Adapting to the implications of climate change at both a strategic and detailed design level;

- iv) Promoting energy efficiency and increasing the supply of renewable energy; and
- v) Maintaining ecological resilience
- vi) Avoiding areas susceptible to flood risk in the first instance in accordance with the sequential approach set out in national guidance; and
- vii) Preventing development that increases flood risk.

5.4.9. Policy DM1 sets out the development management conditions, setting out a list of criteria all development must accord with, namely:

- a) Accord with or enhance the character, local distinctiveness and appearance of the site, existing building(s) and surrounding landscape/ townscape in terms of its siting, layout, scale, height, design, density, use of materials and landscaping;
- b) Not have an unacceptable effect on the amenity of the occupiers of nearby properties/land by virtue of noise, disturbance and overlooking; and provides a satisfactory standard of amenity for the occupiers/users of the development itself;
- c) Safeguard the environment from the adverse effects of pollution of water, land, light or air arising from development;
- d) Take account of personal and community safety and security in its design and layout
- e) Be safely and conveniently accessible for all potential users/occupiers of the development on foot, bicycle, by public transport and by car;
- f) Not give rise to parking or highway safety problems on site or in the locality;
- g) Maximise sustainable travel choices first and then provides for car related needs;
- h) Contribute to low carbon communities through energy efficiency, be designed to minimise the use of non-renewable energy, water and the production of waste both during construction and when in use;
- i) Not increase the risk of flooding but makes adequate provision for sustainably dealing with foul and surface water drainage and not result in an unacceptable impact upon the water environment;
- j) Consider the needs of a diverse population including those with protected characteristics such as age or disability;
- k) On sites which have previously been developed, new development proposals should make use of existing suitable building materials wherever possible for appropriate uses in order to re-use recyclable materials and reduce the amount of imported materials; and
- l) Ensure that any risks arising from past coal mining, as indicated on the proposals map, can be adequately managed.

5.4.10. Policy NE3 sets out that development will only be permitted where it does not cause unacceptable harm to trees, woodlands and hedgerows of significant public amenity, natural or cultural heritage value or those that provide important ecosystem services including mitigating the effect of climate change.

5.4.11. Policy T1 sets out that proposals for new developments that would generate significant amounts of movements should be accompanied by a Transport Assessment and Travel Plan.

5.4.12. Policy T2 sets out the importance of improving the current Active Travel Network and increase opportunities to improve levels of walking and cycling by ensuring new developments contribute to the advancement of the network and include design features and facilities that help to promote Active Travel as a viable alternative to the private car.

5.4.13. Policy T3 sets out that to reduce dependency on the private car, developments which provide for and promote the use of passenger services will be supported where appropriate new highway infrastructure improvements that afford priority to bus based passenger transport over the private car.

5.4.14. Policy R1 sets out that retail, leisure and commercial proposals will be supported in accordance with a hierarchy and where they are appropriate in scale for the particular centre. Llay is identified within the hierarchy as a Local Centre.

5.4.15. Policy R5 sets out that retail facilities will be encouraged in the defined local centre provided it is appropriate in scales and is of a type which will complement and enhance the centre.

5.4.16. Policy R6 sets out that retail development will only be permitted outside [the] local centre if:

- i) There is a need for the proposed floorspace (with precedence accorded to establishing quantitative need);
- ii) There the need cannot be satisfactorily be accommodated within or adjacent to [the] local centre;
- iii) The proposal would not cause unacceptable harm to the vitality, attractiveness or viability of [the] local centre;
- iv) The site is accessible by a choice of means of transport; or
- v) The proposal is for small scale retail development with a floorspace of 100m² or less meeting local needs.

5.4.17. Policy WL1 sets out that within the Welsh Language Sensitive Areas identified on the proposals map, the following developments will be required to submit a Welsh Language Action Plan setting out the measures to be taken to protect, promote and enhance the Welsh Language:

- i) All retail development greater than 400 sq.m.

5.4.18. Policy RE1 sets out that development proposals are required to maximise the potential for renewable energy.

Supplementary Planning Guidance – Planning and the Welsh Language

5.4.19. This Guidance, jointly with local and national planning policies, will provide a means of:

- Raising awareness amongst prospective developers of the need to fully consider the links between development and the character of communities;
- Identify development proposals that will at the outset maintain or enrich the social, linguistic and cultural pattern of communities;

- Identify development proposals that can be modified as a result of discussions to ones that maintain or enrich the social, linguistic and cultural pattern of communities;
- Identify exceptions where the evidence shows that there is no opportunity to modify the proposal in a manner that will reduce the impact on the social, linguistic and cultural pattern of the community and that there are justifiable reasons for recommending the planning application's refusal.

Local Planning Guidance Note No.31 – The Welsh Language and Welsh Communities

5.4.20. This guidance note reflects national and local objectives and amplifies development plan policies contained in the Wrexham Unitary Development Plan designed to protect the Welsh language and Welsh communities. It provides guidance on how the Council will assess the likely future impact of relevant developments, individually or cumulatively, on the wellbeing of the Welsh language and Welsh Communities.

5.4.21. Specific thresholds of development in the language sensitive wards of Ceiriog Valley, Pant, Ponciau, Coedpoeth, Johnstown, Penycae and Minera will require a Welsh Language and Community Impact Statement for all retail development greater than 2,000m². The proposed Gross External Area is 1,921m² and therefore the proposed development falls under the threshold. The Council have however, requested a Welsh Language and Community Impact Statement be produced in support of this application.

6. Retail Planning Considerations

6.1. Introduction

6.1.1. This Retail Assessment was based on a 1,315sq m sales area, as set out in the 2019 planning submission. The planning application proposal now includes minor revisions, which has led to a small increase in the sales floor area from 1,315sq m to 1,333sq m. Due to the minor amendment in floorspace areas, the retail assessment has not been updated as the conclusions would remain the same.

6.1.2. The Retail Assessment should also be read alongside addendum 1 'Effect of the Consent of Lidl Store in Wrexham on Need for new Retail Floorspace in Llay' included at the end of this chapter.

6.2. Retail Proposal

6.2.1. A Retail Assessment is required in support of a planning application for a new Aldi food store located on land off Gresford Road, Llay. The store size is detailed below:

- Sales Area: 1,315 sq. m
- Gross Internal Area: 1,840 sq. m
- Gross External Area: 1,921 sq. m

6.2.2. The proposed Aldi foodstore will provide a local supermarket selling predominantly convenience foods at 80% of the sales area and limited comparison goods such as seasonal and promotional goods, occupying 20% of the sales floorspace.

6.2.3. The application site sits within an out-of-centre location. The proposed store is intended to primarily serve the local community of Llay.

6.3. Scope of Retail Assessment

6.3.1. The site already benefits from an outline permission including a 300 sq.m. retail unit, as set out earlier in this statement. As part of pre-application discussions, the Council has agreed that a proportionate assessment of need and impact is appropriate.

6.4. Study Area and Evidence Base

6.4.1. The study area for the assessment of need and impact is based on local postcode sectors, chosen following discussions with Wrexham Council to reflect the likely natural catchment of the proposed Aldi store. The catchment is based upon the postcode sector areas surrounding the settlements to the north of Wrexham and excludes Wrexham Town Centre. Postcode Sector areas are chosen to allow a telephone survey of shopping patterns to be undertaken to ensure the assessment is based upon up-to-date understanding of local shopping habits. A plan of the Study Area is attached at Appendix 2 and is based upon the postcodes set out below:

- LL11 4;
- LL12 0
- LL12 8; and

■ LL12 9.

6.4.2. A bespoke household survey of shopping patterns was carried out in October 2018. The survey asked those usually responsible for the household convenience shop where they usually shop for the main food shop and for any further top-up shopping trips. The survey also asked a number of additional questions around the shopping trip, including method of travel, propensity for linked trips and the reason for choosing a destination. A copy of the survey questionnaire is attached at Appendix 3.

6.4.3. The shopping patterns identified in the household survey allow an understanding of current shopping habits which underpins the assessments of both need and impact.

6.5. Need

Quantitative Need

6.5.1. As set out above, the assessment of quantitative need is based upon a bespoke household survey of local shopping patterns. The assessment also uses up-to-date population and spending data provided by CACI. The assessment of quantitative need is contained within the tables in Appendix 4.

6.5.2. In addition, JLL has reviewed the Council's borough wide Retail Study which is summarised later in this section.

6.5.3. Table 1 of Appendix 4 sets out the population and spending within the Study Area. Population data is provided by CACI. The data shows that there is expected to be a modest growth in population over the next 5 years.

6.5.4. During pre-application discussions, the nature of the proposed retail store and Aldi's business model were discussed with Council officers. As such, it was agreed that the assessments of need and of impact only need to consider convenience goods shopping (food, drink and non-durable household goods). Given the ancillary nature of the comparison goods offer within Aldi stores, it was agreed that this does not need to be considered in detail. The table sets out the level of personal spending on convenience goods in 2019 based upon CACI data. Future spending levels are estimated using the growth rates provided by CACI. The household survey identifies local levels of internet shopping in the base year of 2019. The price based applied throughout the assessment is 2018.

6.5.5. The table calculates the overall level of spending within the catchment by multiplying the population by the levels of personal spending. The table shows that growth in levels of personal spending and population will lead to over £18.5 m of growth in overall spending in the next five years to almost £87m from £68.27m.

6.5.6. Table 2 sets out the local shopping patterns identified in the household survey from residents within the Study Area. The Table shows the split between main food and top-up shopping trips.

6.5.7. Table 3 goes on to estimate the total turnover of convenience shopping facilities in the base year. The assessment assumes that around two thirds of spending on convenience goods takes place during the main household shopping trip with the final third taking place during smaller top-up shopping trips.

6.5.8. These tables show some clear trends and patterns in local shopping habits. Firstly, only around **one third** of local expenditure (£25.07 m) is spent in shops within the Study Area, with almost £50m being spent in stores outside the Study Area. However, the tables indicate that it is a lack of main-food shopping destinations that is largely the cause of such high levels of leakage. Shops within the Study Area only account for just of 12% (£6.25 m) of the local main food market, with almost all of that spending directed to the Lidl on Mold Road (9.8% / £5.01 m). Conversely, local shops attract over 71% (£18.82 m) of top-up shopping spend.

6.5.9. These tables indicate the gaping hole in main food shopping provision in this part of the County which in turn provides a strong indication of the level of need for a new main-food shopping facility.

6.5.10. The estimated turnover of the proposed Aldi store is calculated in Table 4. The calculation is based upon the retailer's national average sales density. Accordingly, it would be expected that the store would generate a turnover of around £10.8 m. p.a. at the design year of 2021.

6.5.11. Table 5 estimates the capacity or quantitative need within the Study Area to support new retail floorspace. It is considered that this capacity derives from two key sources: growth in local spending; and the leakage of spending to shops outside the Study Area. The table shows that these two sources of capacity amount to around **£63.67 m** in 2021.

6.5.12. The overall level of capacity for retail floorspace in the local area, particularly the high levels of leakage of main food shopping expenditure is a clear and definitive indicator of a quantitative need for new convenience retail floorspace.

6.5.13. This is further reinforced through the findings of the Council's Retail Study, 2014 which identifies a need for 7,000 sq. m. of new convenience retail floorspace across the borough.

6.5.14. JLL has reviewed the Wrexham Retail Assessment 2014 (WRA) in respect of convenience goods shopping. Table 6.6 of the WRA shows that combined all stores within the Study Area are trading significantly above benchmark levels resulting in turnover of £71.9m above expected levels

6.5.15. Furthermore, the WRA shows that additional retail floorspace is required over the plan period from 2014 - 2028 of 7,191 sq m - 7,802 sq m net. Within the shorter term from 2014 - 2018 floorspace of 3,898 - 4,072 sq m is required.

6.5.16. The table below sets out the level of convenience retail floorspace consented since 2014, which totals 2,329 sq.m. Accordingly, based upon the WRA, there remains capacity for 4,671 sq.m.

Consented Convenience Retail Floorspace

Scheme	Convenience Sales Area (sq.m.)
Aldi, Ruthin Road	1,003
Aldi, Plas Coch Extension	323
Aldi, Ruabon	1,003
Total	2,329

6.5.17. The findings of the WRA therefore reinforce the findings of JLL's need assessment, which demonstrates there still remains capacity for additional convenience goods floorspace to serve the borough of Wrexham. Importantly, new floorspace should be targeted to areas of 'need' including to serve Llay and surrounding settlements. Accordingly, it is considered that there is a clear and identified quantitative need for the proposed development.

Qualitative Need

6.5.18. The assessment of quantitative need outlined above demonstrates a clear deficiency in the provision of convenience goods retail in the Study Area. The assessment clearly demonstrates that there are insufficient destinations within the area that allow local residents to carry out their main food shopping trip close to home. Indeed, the Study Area only has one such facility, the Lidl store on Mold Road in Gwersyllt, at the southern end of the Area.

6.5.19. Accordingly, the proposed development will address a clear local deficiency in convenience goods shopping provision. Not only will the proposed development serve the existing residents of the Study Area, but it will provide a valuable and convenient main food shopping destination for the new residents of the planned, sustainable urban extension in Llay.

6.5.20. Furthermore, the lack of everyday shopping facilities is perpetuating unsustainable shopping patterns where local people are being forced to travel longer distances to carry out an important shopping trip. The survey shows that for main food shopping trips, people forced to travel to Wrexham, notably the larger supermarkets. In this regard, it should be noted that on average, 75% of shoppers travel by car as the driver to carry out their main food shopping trip. When including those who travel as the passenger in the car, the total rises to 94%. Accordingly, by locating a new main food shopping destination within walking distance of residential areas, the proposed development offers a real opportunity to reduce the reliance on the private car.

6.5.21. In so doing, the development will help promote more sustainable shopping patterns. Journey lengths will generally be reduced and for residents of northern Llay, including those in the planned urban extension, the store will be within walking distance.

6.5.22. Discount supermarkets increasingly compete with the 'Big 4' operators and offer a broad but not complete range of convenience items at a dramatically reduced cost. This national trend is borne out by the evidence of the household survey which shows that 21.8% (£10.9m of £49.94m) of expenditure leaking out of the Catchment Area is spent in the discount supermarkets (i.e. the Aldi stores in Wrexham, Broughton and Buckely and the Lidl store in Wrexham).

6.5.23. This clearly demonstrates that there is customer demand resulting in a qualitative requirement by residents of the catchment area to shop at a discount supermarket particularly as they are currently willing to travel significant distances to shop at such a store.

6.5.24. Not only would a discount store provide high quality produce at heavily discounted prices, but it would also reduce travel costs for those shoppers currently travelling out of the catchment area. Therefore, local residents will both save money by shopping in the proposed discount store and by reducing travel costs. The qualitative need for the proposal is therefore highly important to support the local and hinterland communities of.

6.5.25. Having regard to the above, it is considered that there is a clear and compelling qualitative need for the proposed development in Llay which will deliver sustainable development.

Conclusions on Need

6.5.26. The assessment of need set out above demonstrates that there is a clear and compelling need for new main-food convenience retail floorspace in the Study Area. The need is both quantitative (the need to reduce the extremely high leakage of spending) and qualitative (to address a local deficiency in provision and to encourage more sustainable travel patterns).

6.5.27. Accordingly, the proposed development accords with PPW, TAN4, Policy S3 of the Wrexham Unitary Development and Policy R6 of the deposit Wrexham Local Plan.

6.6. Sequential Test

6.6.1. The requirements for a discount foodstore are a minimum site area of 0.75 ha (1.85 acres) to accommodate a single store development. This allows for accommodation of the food store, servicing and at least 100 car parking spaces. A site must be regular in shape to provide the most efficient use of land. Irregular shape sites can be less efficient requiring even more land to accommodate the proposal.

6.6.2. A prominent position on the highway is also required. Lack of visibility from the highway detracts from a viable business. The acquisition costs and any costs associated with physical constraints are taken into account when identifying a site such as remediation, topographical levels, ecological measures and diversion of services.

6.6.3. Development costs are an integral part of the site selection process and affect the overall price of goods sold. It is therefore essential that sites are viable so that the price of goods on the shop floor remain low in line with the company's business format. Only prominent and viable sites of the required size are considered further by deep discounters in terms of their suitability.

6.6.4. Discounters are modest in size as they sell a limited number of lines. The size of store also means they serve a local catchment area with a population of up to 25,000 people. Typically, within urban areas, a deep discounter store will serve a five-minute drivetime as its catchment area. In more rural areas that catchment area extends to serve hinterland communities as population is generally sprawled out.

6.6.5. A discount foodstore's store format is designed to provide an efficient operation which includes providing sufficient floorspace for its stores to accommodate the sales floorspace, warehouse, amenity and other back of house uses, servicing, car park and access. There are two operators within the UK discount food market. In recent years their new stores have increased in size providing a sales area upwards of 1,254 sq.m to accommodate its range of produce, refrigeration, freezer and other display equipment, spacious aisles for customer movement and sufficient tills to manage queues.

6.6.6. Aldi is identifying additional relocation sites and building modern, efficient, fit for purpose stores such as the proposed store.

6.6.7. As set out below, the applicant has sought to identify a site to accommodate a new store in meeting its requirements for Llay.

6.6.8. The following sites have been identified for assessment as part of the sequential test:

Local/District Centres

- Llay (Local Centre)
- Gresford (Local Centre)
- Gwersyllt (District Centre)

Edge of Centre

- None identified

Out of Centre

- Land at Home Farm
- Gresford Royal British Legion Site

Local and District Centre Sites

6.6.9. Pre-application discussions with Council officers confirmed that there are no available development sites within Llay and the surrounding towns of Gwersyllt and Gresford. However, consideration has been given to available retail units within these centres. Furthermore, Llay does not have a defined centre, although within the

emerging local plan it is proposed that the retail parade at Fifth Avenue will be defined as Llay Local Centre. This assessment therefore also assesses any opportunities within the emerging local centre.

Llay

6.6.10. As at April 2019, there is no defined Llay Town Centre identified within the current Development Plan. The emerging Local Plan proposals map does however identify a Local Centre within Llay, adjacent to Fifth Avenue. For the purposes of this report, we have considered the emerging Local Centre boundary as part of this sequential test.

6.6.11. During a site visit undertaken on 18 March 2019, it was identified that there is a total of 1 vacant unit in Llay Local Centre. The unit is located on Fifth Avenue, along the main retail parade (see image 1 below). The unit is a small, town centre shop which has residential uses on the first floor and has a ground floor Sales/Display Area of 419 sq.m. (1374'8" sq.ft). The Sales Area of the proposed Aldi store is 1,315 sq.m. and therefore this unit is 3 times smaller and is therefore not able to accommodate a store broadly similar to the one proposed. Therefore, the unit is not suitable.



Figure 2

6.6.12. Having regard to the above, it is concluded that there are no available and suitable sites within Llay Town Centre for the proposed development, therefore the centre is discounted from the sequential test.

Gresford

6.6.13. During a site visit undertaken on 18 March 2019, it was identified that there is 1 vacant unit and 1 vacant parcel of land within Gresford Local Centre.

6.6.14. The vacant unit is located along the B5445 ('Chester Road') along the main retail parade (see image 2 below). The unit is a small, town centre shop offering 37 sq.m. of retail floor space and 4 car parking spaces. The Sales Area of the proposed Aldi store is 1,315 sq.m. and therefore this unit is 35 times smaller and is therefore not able to accommodate a store broadly similar to the one proposed. Therefore, the unit is not suitable and discounted from the sequential test.

**Figure 3**

6.6.15. The vacant parcel of land fronts onto the B5445 ('Chester Road') and High Street (See image 3 below). The parcel of land is brownfield but only has a site area of 715 sq.m/0.072ha and is therefore far below the minimum required site area of a discount foodstore. The Gross External Area of the proposed Aldi store is 1,912 sq.m. and therefore this parcel of land is approximately 2.6 times smaller and is therefore not able to accommodate a store broadly similar to the one proposed. Therefore, the unit is not suitable and discounted from the sequential test.

**Figure 4**

**Figure 5**

6.6.16. Having regard to the above, it is concluded that there are no available and suitable sites within Gresford Town Centre for the proposed development.

Gwersyllt

6.6.17. During a site visit undertaken on 18 March 2019, it was identified that there are 2 vacant parcels of land within Gwersyllt District Centre.

Gwersyllt Site 1

6.6.18. The parcel of land is located off Dodds Lane, adjacent to the main shopping parade (See figure 5 below). The parcel of land is grassed and has a site area of 695 sq.m/0.069ha and is therefore far below the minimum required site area of a discount foodstore. The Gross External Area of the proposed Aldi store is 1,921 sq.m. and therefore this parcel of land is approximately 2.7 times smaller and is therefore not able to accommodate a store broadly similar to the one proposed. Therefore, the unit is not suitable and discounted from the sequential test.

**Figure 6**

**Figure 7**

Gwersyllt Site 2

6.6.19. The parcel of land is located to the east of Mold Road, south of the existing Gwersyllt Lidl Store (see figure 7 below). The parcel of land is grassed and has a site area of 1573 sq.m/0.15ha and is therefore below the minimum required site area of a discount foodstore. A minimum site area of 0.75 ha is required to accommodate the proposed development. However, Site 2 is only 20% of the land area required to accommodate a store broadly similar to the one proposed. Therefore, the site is not suitable and discounted from the sequential test.

**Figure 8**



Figure 9

Edge-of-Centre Sites

6.6.20. As the application site is in an out-of-centre location, it is appropriate to consider any potential sites located on the edge of Llay Local Centre. A review of Llay and a discussion with planning officers during the pre-application meeting identified that there are no potential edge of centre sites which can be considered as part of the sequential test.

Out of Centre Sites

Llay Royal British Legion Site

6.6.21. The Royal British Legion Site is located to the west of Llay New Road ('the B5425') (see figure 9 below) and has an active application currently pending across the site for the following development 'Mixed Use Hybrid Development Comprising Residential Development (Outline), A 4,000 Sq Ft (371 sq.m. Retail Unit (Outline), A Boxing Club (Outline), A Car Park (Full), Details Of Access (All Other Matters Reserved) And Associated Works'.

6.6.22. The retail element of the proposal can accommodate 371 sq m of retail floorspace. This is 19% of the required floorspace for the proposed Aldi development. The site is significantly too small therefore unsuitable for the proposed development. Furthermore, the site is located in an out of centre location which is not sequentially preferable to the application site and does not warrant any policy protection. The site is not suitable for the proposed development therefore is discounted from the sequential test.



Figure 10

Land at Home Farm off Gresford Road- The Application Site

6.6.23. Land at Home Farm ('the application site') has been identified within the sequential assessment as both available and suitable for development as a discount supermarket. The site is well connected with the existing residential areas of Llay, will form part of the planned extension to the settlement and can accommodate the proposed development. No other sites have been identified that are available and suitable for the proposed development.

6.6.24. The site therefore passes the sequential test.

Conclusions on the Sequential Test

6.6.25. Having regard to the above, it is concluded that there are no sites within or on the edge of Llay Local centre, Gresford Local centre or Gwersyllt District centre; or within or on the edge of those towns, having regard to the need for a flexible approach, that are both available and suitable for the proposed development. No out of centre sites have been identified that are sequentially preferable to the application site. As such, it is concluded that the application site is the sequentially preferable site that is both suitable and available and thus passes the sequential test. Accordingly, the submitted application is in accordance with PPW, TAN4 and Policy S4 of the Development Plan in this regard.

6.7. Retail Impact Assessment

6.7.1. It should be noted that the proposed development is below the 2,500 sq.m. threshold set out in PPW, but it was agreed with Council officers during pre-application discussions that a high-level assessment would be carried out. The assessment of retail impact is based upon the assessment of quantitative need attached at Appendix 4. The assessment of trade diversion and impact in 2021 on existing stores is set out in Tables 6 and 7.

6.7.2. Typically, Aldi stores divert trade from like for like stores which are existing Aldi stores and Lidl stores within and outside of the defined catchment area. However, Aldi is increasingly competing directly with the big four supermarket operators. Given the limited range of main-food convenience shopping destinations in the surrounding area, it is a reasonable assumption that trade will be diverted from existing Supermarkets in the wider area and beyond the Study Area and to a lesser extent, the smaller convenience stores in Llay and the wider Study Area.

6.7.3. Furthermore, shoppers are changing their convenience shopping patterns. They are increasingly visiting Aldi as part of a shared trip. Given the range of products on offer at an Aldi store, shoppers buy quality products at low

prices that are available at the store and continue their shopping at a larger format store for other products including branded products (or vice versa). Given the limited range of products in an Aldi store (they sell circa 1,800 lines compared with over 20,000 – 40,000 lines in the larger format stores) shoppers are encouraged to continue to use local, independent and specialist retailers therefore linked trips are common to and from Aldi stores.

6.7.4. In addition, Aldi's range of branded goods is limited to 5% of all goods. Therefore, shoppers still visit competing stores to buy branded products which Aldi do not sell. Indeed, an Aldi store is not a one stop shop, rather it provides a complementary shopping offer with local independent and specialist retailers; and with the larger format stores. Of particular note, Aldi does not provide a bakery, fresh meat, deli or fish counters. Nor does it provide tobacco or pharmacy counters. There are no concessions or cafes within an Aldi store. All these offers are absent and reduce the dwell time within an Aldi store, which encourages customers to use their Local and District centre stores to provide such goods and services.

6.7.5. On this basis, the assessment of trade diversion set out in Table 6 is based upon the existing shopping patterns identified by the household survey, weighted heavily in favour of the main food patterns and the larger supermarkets, with which Aldi will primarily compete.

6.7.6. The assessment shows that the most trade will be diverted from the main supermarkets around Wrexham:

- Aldi, Plas Coch, Wrexham (£1.52 m)
- Asda, Wrexham (£1.88 m);
- Morrison's, Wrexham (£0.62 m)
- Sainsburys, Wrexham (£2.3 m); and
- Tesco, Wrexham (£1.47 m).

6.7.7. All of these stores are located in edge or in out of centre locations. As such, they do not benefit from direct town centre policy protection. The assessment also estimates that around £0.3m will be diverted from Wrexham Town Centre.

6.7.8. As the Study Area only forms a small part of the catchment for Wrexham, the Wrexham Retail Study 2014 has been used to estimate the overall turnover of these stores and the Town Centre. On this basis, the overall level of impact is considered to be low. Table 7 shows that the Aldi store on Plas Coch Retail Park would feel the largest effect, with an impact on turnover of around 4.95% while the Town Centre would experience an impact of around 1.63%.

6.7.9. Looking at retail facilities within the Study Area, the assessment assumes that retail facilities will benefit from a modest amount of inflow expenditure from passing trade. For most facilities this is assumed to be 5% of locally generated turnover. However, for Gwersyllt, this is considered to be around 15%, taking account of the centre's status as a District Centre and its location close to the edge of the Study Area.

6.7.10. The assessment shows in Table 7 that the impact of the proposed development on stores would be less than 1% as most stores are top up shopping destinations, with which the Aldi store would not compete directly. The impact on local shops in Llay would be slightly higher (2.3%), but this level of impact remains low and would not cause any significant impacts on trade in the centre.

6.7.11. The level of impact anticipated to be felt by Gwersyllt District Centre would be less than 6%. This slightly higher level of impact is not surprising as Gwersyllt is the only centre in the Study Area that benefits from a main-food shopping destination, Lidl. It is anticipated that the Lidl would experience the majority of this impact, but at under 6%, it is considered this would not amount to any significantly adverse effects on trade within the centre.

6.7.12. Importantly, any impact on edge of centre stores is unlikely to have any material impact on the health of a town centre. As set out above, an Aldi store is not a one stop shop, rather, it provides a complementary shopping offer with local independent and specialist retailers; and with the larger format stores. Of particular note, Aldi does not provide fresh meat, deli or fish counters. Nor does it provide tobacco or pharmacy counters. There are no concessions or cafes within an Aldi store. All these offers are absent and reduce the dwell time within an Aldi store, which encourages customers to use their town centre stores to provide such goods and services. As such, a trip to an Aldi store is likely to be accompanied by an onward, linked trip to other shops and services.

6.7.13. This benefit was accepted recently by an Inspector when considering a similar out-of-centre Aldi store in nearby Whitchurch. At paragraph 11 of the decision letter, the Inspector concluded:

“In terms of linked trips, in my view, those choosing to shop at the proposed ALDI store would still be likely to make onward trips into the town centre to purchase other types of goods to those offered by ALDI. They would also use the various other facilities such as banks, public houses and cafés. Indeed, there are many town centre businesses that have completely different offers to a store such as ALDI and I see no reason why it would divert shoppers away from using those other businesses.”

6.7.14. Indeed, this facilitation of linked trips is a noticeable benefit when compared to larger supermarkets which often aim to provide a one-stop-shop approach which minimises the need for any further linked trip.

6.7.15. There are no known investment schemes in Llay or Wrexham Town Centre for the proposed development to affect. Furthermore, there are no other significant permissions for retail development that would need to be included within the consideration of impact.

6.7.16. Having regard to all of the above, it is concluded that the retail impact assessment shows that the proposed development would not have a ‘detrimental consequence’ on designated centres, which in the case of this assessment is Gwersyllt and the emerging centre at Llay. Therefore, the proposal accords with PPW, TAN 4, Policy S3 of the Wrexham Unitary Development Plan and Policy R6 of the deposit Local Plan.

6.8. Summary of Retail Assessment

6.8.1. The assessment of the retail policy implications of the proposed Aldi store has been informed by a bespoke household survey of shopping patterns and a thorough consideration of potential alternative sites within and on the edge of identified centres in the local area.

6.8.2. The scope of the assessment was discussed and agreed with Council officers during pre-application discussions and has been undertaken in a manner that is proportionate to the scale and nature of the proposal.

6.8.3. The assessment concludes that there is a need for the proposed development, both in quantitative and qualitative terms, that there are no available and suitable sequentially preferable sites and that it will not result in detrimental consequence on Wrexham Town Centre, Gwersyllt District Centre or Llay Local Centre. Importantly the proposal will deliver a sustainable development that will result in sustainable shopping patterns for the local community. As such, it is concluded that the proposed development fully accords with retail policies within PPW, the provisions of TAN 4, Policy S3 of the Wrexham Unitary Development Plan and Policy R6 of the deposit Wrexham Local Plan.

6.9. Addendum 1 - Effect of the Consent of Lidl Store in Wrexham on Need for new Retail Floorspace in Llay

Introduction

6.9.1. This note has been prepared in respect of the planning application submitted by Aldi Stores Limited for a new supermarket at Home Farm, Gresford Lane in Llay (application ref: P/2019/0525).

6.9.2. Following the recommendation of officers at Wrexham Council to grant planning permission for a new Lidl supermarket at the Police Station Site in Wrexham, planning officers have requested that consideration for how this may affect the need for the proposed new Aldi store in Llay is provided.

6.9.3. The Lidl proposal includes a new supermarket which will have a sales area of 1,325 sq.m , of which up to 80% of floorspace (1,060 sq.m.) will be used for the sale of convenience goods and 20% (265 sq.m.) for the sale of comparison goods. The site is located within Wrexham, on the edge of the defined town centre, close to the existing Asda and Tesco supermarkets.

6.9.4. The information submitted with the Lidl application indicates that the store would be expected to turnover around £8.6m on convenience goods and around £2.1 m on comparison goods.

Trade Draw of the Proposed Lidl Store

6.9.5. Being located in Wrexham, the proposed Lidl store would draw most of its trade from people living in the local area. However, some trade will likely come from people living further afield, including from within the Study Area of the proposed Aldi store in Llay.

6.9.6. The household survey undertaken to inform the retail assessment for the proposed Aldi in Llay indicates that the Asda and Tesco stores in Wrexham, which are close to the proposed Lidl, draw between £7.2 m (Tesco) and £8.6 m (Asda) from the Study Area. The most recent Wrexham Retail Study indicates that these stores turned over around £50m (Tesco) and £62 m (Asda). Therefore between 14% and 15% of the turnover of these stores is drawn from residents of the Llay Study Area.

6.9.7. It can be assumed that the proposed Lidl will draw trade in a similar fashion, such that it is likely around £1.3 m (15% of £8.6 m) will come from residents of the Study Area.

6.9.8. It is also clear that the Llay Study Area is largely distinct and separate from the proposed Lidl store Study Area.

Effect of Need for the Proposed Aldi Store

6.9.9. The JLL assessment of quantitative need concluded that there will be capacity within the Study Area of £63.7m by 2021. This is made up of growth in local spending (£12m) and leakage of spending outside the Study Area (£51.7m).

6.9.10. The vast majority of the leakage is to destinations in Wrexham, principally the edge and out of centre supermarkets, which account for over three quarters of all leakage (£39.75 m). The proposed Lidl would exacerbate this leakage.

6.9.11. Notwithstanding the above, the overall level of capacity at 2021 (£63.7 m) is more than enough to support the proposed Aldi (£10.8m) and the draw to the proposed Lidl in Wrexham (£1.3m).

6.9.12. The communities of Llay and neighbouring settlements are void of any supermarket offer. Small convenience stores are present, but residents have to travel outside of the study area (as referred to above) to supermarkets such as Asda and Tesco for their weekly shop. This is not sustainable. A clear quantitative and qualitative deficiency in supermarket provision is clearly demonstrated with and without the proposed Lidl store at the police station site.

Conclusion on Need

6.9.13. Having regard to the above, it is concluded that although the proposed Lidl store in Wrexham will draw some trade from residents of the Llay Study Area, there will still be more than enough capacity to support both the proposed Lidl in Wrexham and the proposed Aldi store in Llay.

6.9.14. The Llay Study Area also shows that there are no supermarkets to serve the local community, only convenience stores which are sufficient for a basket shop only.

6.9.15. Accordingly, there will remain a clear need for the proposed Aldi store.

7. Planning Considerations

7.1. Introduction

7.1.1. This section assesses the proposed development against the requirements of national planning policy set out in PPW 10 and accompanying Technical Advice Notes, the current Development Plan and the emerging Local Plan Development Plan 2, as set out in Section 5. This section draws upon the conclusions of the suite of technical assessments submitted in support of the planning application.

7.2. Sustainable Development

7.2.1. The PPW sets out that developments should seek to maximise energy efficiency and the efficient use of other resources, highlighting that good design promotes environmental sustainability. Moreover, adopted Policy GDP1 sets out how Wrexham council aim to secure development of sustainable communities, through the promotion of the economic, social and environmental well-being of the area.

7.2.2. It is considered that the criteria within the PPW and local policy provide a reasonable framework for considering what constitutes sustainable development and therefore has significant weight in the decision-making process.

7.2.3. The proposed food store scheme compliments and integrates with surrounding land uses, which is a mix of retail and commercial area. As such, the development will not negatively impact on the surrounding setting and will reinforce the local economy.

7.2.4. The Application site is approximately 85 metres walk from bus stops on the B5102 'Llay Road' which are served by services to Wrexham, Southsea and Trevalyn. The site is also within the immediate setting of residential properties and adjacent to land currently being developed for 362 new dwellings as part of a planned, sustainable extension to the settlement of Llay. Accordingly, the Application Site is easily accessible by public transport and is well located to encourage walking. Therefore, the Application Site is a sustainable location.

7.2.5. Llay is currently experiencing significant development with the introduction of a new housing development abutting the application site to form an extension to the settlement. The proposal will contribute to the need for additional services to support a growing settlement such that it is sustainable.

7.2.6. The proposal will provide a local supermarket thus reducing the need for shoppers to travel outside of the study area to larger supermarkets resulting in sustainable shopping patterns and reduced fuel and travel costs.

7.2.7. Based on the above, it is considered that the proposed development would support the main retail needs of the residents of Llay and constitute positive economic investment, securing benefits across all dimensions of sustainable development (social, economic, environmental and cultural well-being) as set out in the PPW. Accordingly, it is concluded that the proposed development comprises sustainable development for the purposes of planning policy.

7.3. Principle of Retail Use

7.3.1. It is noted that the extant planning permission on the application site (ref: P/2014/0905) includes permission for the construction of a 300 sq.m. shop unit. Accordingly, the principle of retail use in this location has been accepted.

7.3.2. As the proposed development is for a town centre use in an out-of-centre location, a Sequential Assessment is required to give the Council comfort that the proposal is the most sequentially preferable site. The Sequential Assessment identified no sites within the defined study area that are both available and suitable for development of a similar nature to the proposed store and allowing for flexibility.

7.3.3. Vacant units and land in Llay Local Centre, Gresford Local Centre and Gwersyllt District Centre were also considered and overall, it is concluded that there are no suitable and available sites for the proposed development.

7.3.4. Furthermore, a quantitative assessment of need and impact have been carried out in respect of the proposed development. The assessment is based on up-to-date evidence of local shopping patterns and spending. The assessment demonstrates that there is a need for the proposed development and that there would not be significant impact on the vitality and viability of Llay Local Centre.

7.3.5. The proposal passes the need test, sequential test and impact tests and thus complies with national retail policy and Policy S4 in the Wrexham Borough Council Unitary Development Plan and Policy R6 of the emerging Wrexham Local Development Plan.

7.4. Design

7.4.1. Careful consideration has been given to the design of the store due to its proximity to residential properties and its prominent location, fronting onto both Gresford Road and Straight Mile.

7.4.2. The proposal has been designed in such a way to ensure sufficient car parking provision and servicing access as well as visibility of the store from the surrounding road network. This is a fundamental requirement for any retailer. The layout ensures a prominent and active frontage onto the customer car park and the surrounding road network, which complements the existing neighbouring uses.

7.4.3. The layout also ensures it integrates well with the neighbouring residential site to ensure maximum amenity for existing and future residents.

7.4.4. Furthermore, the proposed boundary treatments have been carefully designed to ensure minimal impact on the amenity of local residents and present a clear line demarcating the foodstore element of the site. Where possible, existing boundary treatment have been retained and enhanced to ensure the scheme integrates with its surroundings. Furthermore, the layout of the scheme has been amended since its inception to ensure the trees that now form part of a TPO along Gresford Road are retained.

7.4.5. In terms of design and materials, the proposed store uses a simple palette of materials, drawing on locally used materials to complement the local area by a way of introducing a modern addition to the local vernacular and immediate context.

7.4.6. Having regard to the above, it is considered that the development accords with section 3 of PPW and with Policy GDP1 of the Wrexham County Borough Council Unitary Development Plan.

7.5. Flood Risk

7.5.1. The Council requires a Flood Consequence Assessment (FCA) to be submitted albeit the site falls within Flood Zone A. The FCA concludes that the site is located in Flood Zone A and is an area considered to be at little or no risk of fluvial or tidal flooding, with a less than 0.1% (1 in 1000) annual probability of flooding. The site is not currently at risk from tidal flooding, but there is some risk from fluvial, surface water, groundwater and artificial sources.

7.5.2. The FCA has concluded that the flood risk is associated with surface water ponding within a topographical low point (fed directly by rainfall). The risk of flooding will be removed post development through the inclusion of

a sustainable drainage system designed to accommodate the 1 in 100 year plus climate change storm event. As such, the development will not displace floodwater or increase flood risk elsewhere.

7.5.3. Furthermore, in the unlikely event of flooding, flood waters would be contained within the service yard area which forms a low point on site. The development will not displace floodwater to surrounding land.

7.5.4. The planning application is supported by the FCA and it has been demonstrated that the proposal will not displace floodwater to surrounding land and will not increase flood risk elsewhere. The proposal is therefore in accordance with Policies EC12 and Policy EC13 of the Wrexham County Borough Council Unitary Development Plan, Policies DM1 and SP19 of the emerging Local Plan Document and Technical Advice Note 15.

7.6. Drainage

7.6.1. A Drainage Strategy Statement has been prepared by SWF to support the planning application. The Statement explains that the existing site is within Flood Zone A and therefore has little or no risk of fluvial or tidal/coastal flooding.

7.6.2. The proposed Drainage Scheme comprises of the car park area which will be drainage on the basis of a lined, permeable car park, most likely using permeable macadam as blocked paved materials are not durable within an Aldi car park. It is anticipated that the surface drainage on the service yard will be via ACO channels with silt traps to prevent the build-up of silt within the attenuation tank. It is expected that the ACO channel will be designed for the 100 year storm event to give additional storage within the drainage network when it comes to final design.

7.6.3. The roof area is to drain via conventional gravity fed rain water pipes on the rear elevation with the discharge being collected in oversized pipes or geo-cellular tanks at the rear of the site.

7.6.4. Any geo-cellular attenuation tanks that would be used are likely to be ESS Versavoid tanks which are capable of CCTV camera entry and jet/ vacuum cleaning via inspection points directly over the tanks.

7.6.5. Under the Welsh Government requirements, the development will be subject to a separate SAB application to Wrexham Council to agree the proposed drainage scheme.

7.6.6. Based on the above, it is considered that the proposed development is in accordance with SAB standards and in line with policy of EC13 of the Wrexham County Borough Council Unitary Development Plan and Policy DM1 of the emerging Local Development Plan.

7.7. Highways

7.7.1. The application submission is supported by a Transport Assessment carried out by Cameron Rose Associates which examines the highway and transportation issues associated with the proposed development.

7.7.2. Based on the findings of the TA, it is considered that the proposal can be accommodated without detriment to the operational capacity or safety of the local highway network and that it can be readily accessed by sustainable modes.

7.7.3. The site is within a sustainable location as it is located in close proximity to the bus stops which provide services that are ideally placed to cater for the need of the proposed foodstore and is accessible by other sustainable modes of transport, including walking and cycling.

7.7.4. Customer and service vehicle access to the development site is proposed via a newly formed priority-controlled junction off the B5373 Gresford Road, approximately 135 meters south of the Crown Crossroads.

7.7.5. In addition, pedestrian access is encouraged via the main vehicular access point at Gresford Road, two dedicated pedestrian access points off B5373 Gresford Road, approximately 80 metres to the south of the Crown Crossroads, providing a direct route to the store; and a direct route in from the north west corner of the site off Straight Mile and directly into the new housing development.

7.7.6. The proposed development will have a minimal impact on the operational performance of the local highway network and is accessible by a range of sustainable modes of transport, and therefore accords with the PPW and Policy GDP1 within the adopted Development Plan and Policies DM1 and T1 within the emerging Local Development Plan.

7.8. Noise

7.8.1. A noise assessment has been undertaken by Spectrum Acoustic Consultants to assess the potential impact of noise produced by mechanical services plant and deliveries associated with the proposed development.

7.8.2. In relation to deliveries, the assessment concludes that noise levels from deliveries would meet noise limit objectives and consequently have a low impact.

7.8.3. In relation to the mechanical services plant, the assessment concludes that the overall noise levels from these services would also meet noise limit objectives and consequently have a low impact.

7.8.4. The noise assessment has therefore concluded that the development would have a low overall impact on the nearby residential community, in line with Policy GDP1 within Wrexham County Borough Unitary Development Plan and Policy DM1 within the emerging Local Development Plan.

7.9. Air Quality

7.9.1. BWB Consulting has undertaken an Air Quality Assessment (AQA). As part of the AQA, a qualitative construction phase assessment was undertaken, and measures are recommended to minimise dust emissions during construction activities. With the implementation of these mitigation measures the impact of construction phase dust emissions is considered to be 'not significant' in accordance with IAQM guidance.

7.9.2. Furthermore, a detailed road traffic emission assessment was undertaken to consider the impact of development-generated road traffic on local air quality at identified existing receptor locations. The development was not predicted to result in any exceedances of the relevant air quality objectives and the impacts considered to be 'negligible' in accordance with IAQM and EPUK guidance.

7.9.3. In conclusion, it is considered that, with the recommended mitigation measures, air quality does not represent a material constraint to the development proposals, which is in line with Section 6.7 within Planning Policy Wales and Policy GDP1 within Wrexham County Borough Unitary Development Plan and Policy DM1 within the emerging Local Development Plan.

7.10. Ecology

7.10.1. A Preliminary Ecological Assessment (PEA) has been undertaken by Cambrian Ecology Ltd. The purpose of the assessment was to gain baseline ecological information of the site in order to assess its current status, to identify any ecological constraints to development that may currently be associated with the development areas and/or the surrounding land, and to recommend further surveys if necessary.

7.10.2. The habitat on the proposed site comprises a very limited range of habitats with the site dominated by heavily improved grassland. Also present is a mature tree line, an ephemeral ditch surrounded by scrub, and species poor hedges.

7.10.3. A biological records search was carried out with the Local Records Centre, (LRC) Cofnod as recommended in the guidance from the Chartered Institute of Ecology & Environmental Management, (CIEEM). The data search revealed no records of protected species or designated sites for the site itself. A small number of GCN and bat records were present within a 1km search area, but none of these were within 0.5km of the site.

7.10.4. With regards to Great Crested Newts, a HSI assessment was also made on both the ephemeral pond/ditch on the site and a nearby pond outside the site boundary. Due to the fact that the ponds have been previously surveyed and continue to only score 'poor' and 'below average' respectively in the HSI assessment, combined with the assessment of the terrestrial habitat, this is considered to be a proportionate level of survey work.

7.10.5. The assessment concluded that the proposals are unlikely to have a negative impact on bats and great crested newts and with a favourable management regime in place, the proposals have the potential to provide a positive impact for nesting birds.

7.10.6. With regards to habitats, the proposals will not constitute a negative impact to the Ephemeral Pond/Ditch, Improved Grassland, scrub or Tree Line. The Species Poor Hedges on the site could benefit from a mitigation strategy to encourage 'Biodiversity Gain' by introducing more favourable management regimes.

7.10.7. Based on the above, it is considered that the proposed development will be in accordance with section 3 within National Planning Wales. and with Policy EC4 within the Wrexham County Borough Council Unitary Development Plan and Policy SP15 within the emerging Local Development Plan.

7.11. Trees

7.11.1. The proposal originally included the removal of many of the trees along the Gresford Road boundary and replacement on site. The scheme has since been redesigned to retain the trees following the TPO. The scheme has also factored in redesign of the proposed car park, realignment of the footpath and includes a detailed tree pit design following detailed discussions with WCBC Arboricultural Officer (refer to V2636 D01A Tree Pit Detail, V2636-D02B – Tree Pit Detail (Car Park Trees – Section A-a) and V2636-D03B – Tree Pit Detail (Car Park Trees – Section B-b)).

7.11.2. The applicant has liaised with the Council's tree, highways and planning officer to ensure that the 'protected' trees are retained and the proposal can be implemented appropriately and operate in regard to site access, pedestrian routes, car park configuration etc. Subject to this recommendation, the development accords with National Policy Wales and with Policy EC4 within the Wrexham County Borough Council Unitary Development Plan and Policy NE3 within the emerging Local Development Plan.

7.12. Conclusion on Planning Considerations

7.12.1. Having regard to the above assessment of the relevant planning policies, it is concluded that the proposed Aldi store will deliver sustainable development and thus benefits from the in-principle support within the Development Plan and national policy. Furthermore, the application proposal is considered to be in accordance with the relevant policies of the Development Plan taking on board all technical assessments provided. On that basis, taking account of the material considerations and evidence provided in support of the planning application, it is concluded that the proposal complies with objectives of the Development Plan.

8. Conclusions

8.1. Summary and Conclusion

8.1.1. This Planning Statement is submitted in support of an application for the 'Erection of a foodstore (Use Class A1), car park, access and landscaping at land at Home Farm, Llay'.

8.1.2. The application site is out of centre and as such, Planning Policy Wales requires that all retail proposals should provide an assessment of sequentially preferable sites and that a proposal should only be supported if no sequentially preferable sites are identified.

8.1.3. An assessment of sequentially preferable sites has therefore been undertaken. Of the sites assessed, none were found to be suitable for the proposal. Therefore, the application site passes the sequential test.

8.1.4. The assessment of retail need demonstrates that there is a quantitative and qualitative need for the proposed development. Additionally, the assessment of potential impact demonstrates that the development will not undermine the vitality and viability of Llay Local Centre. Accordingly, the proposed development accords with Policy Man 3 of the Development Plan and PPW.

8.1.5. Overall, the retail proposal will provide a sustainable development which will promote sustainable shopping patterns to benefit the growing local community.

8.1.6. The proposed development of an Aldi foodstore will create up to 40 jobs comprising full time and part time positions, thus delivering significant benefits to the local economy.

8.1.7. The impact of the proposed development on the highway network has been thoroughly assessed as part of the development proposals. The Transport Assessment submitted in support of the application demonstrates that the proposed development would not have a severe impact on the operational performance of the highway network. It is therefore concluded that there are no overriding reasons preventing the Local Planning Authority from recognising that the proposal is acceptable with regard to the local highway network.

8.1.8. A Primary Ecological Assessment has been carried out and is submitted in support of the development proposals. The assessment concluded that the habitat comprises a very limited range of habitats at the site. With favourable management schemes put in place, the proposals are not considered to constitute a negative impact on the ecology on site.

8.1.9. In terms of flooding, a FCA was submitted in support of the application which states that the development will not displace floodwater to surrounding land and will not increase flood risk elsewhere.

8.1.10. With regard to residential amenity, measures have been incorporated into the design of the layout and landscaping of the scheme to ensure the protection of the nearby. Most notably, the store has been positioned with care to mitigate any potential impact on amenity. Fencing along the site boundary and service area has been introduced to the proposed store, which is not a standard Aldi feature, to further mitigate any potential noise impacts as a result of the proposed operation. A Noise Assessment has been carried out and concludes that the proposed delivery hours are appropriate and will ensure that the amenity of any neighbours is not affected. The existing trees will be retained along Gresford Road which are subject of a TPO and will retain privacy of existing residents.

8.1.11. The proposal will provide a sensitively designed development which is compatible with and complementary to the surrounding uses. A significant quantum of jobs will be introduced as a result of the proposal, in the region of 40 jobs comprising full time and part time positions, with most being taken up by local people.

8.1.12. Overall, it is concluded that the proposed development comprises sustainable development which meets all relevant policy tests set out in the Development Plan, PPW and its accompanying Technical Advice Notes. Accordingly, it is concluded that the proposed development is in accordance with the Development Plan and should be granted consent.

Appendix 1



Appendix 2

Catchment Area and Store Provision Map



Key site

Study area: LL11 4, LL12 0, LL12 8 and LL12 9

Postal sectors

Foodstore Category

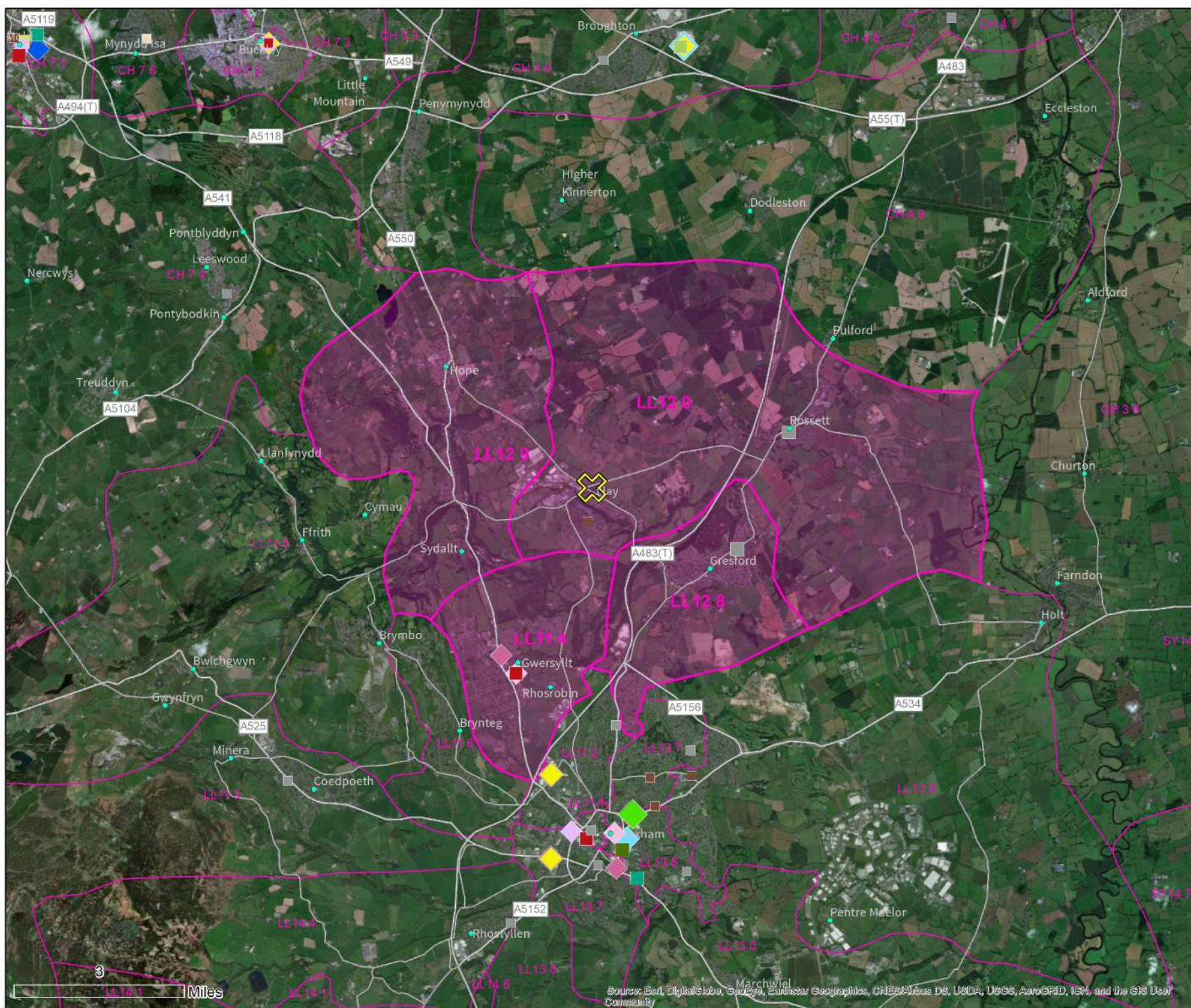
- Hypermarket
- Superstore
- Supermarket
- Small Supermarket
- Convenience Store

Fascia

- ALDI
- ASDA
- B&M
- CO OP
- FARMFOODS
- HERON FROZEN FOODS
- HOME BARGAINS
- ICELAND
- LIDL
- M&S FOODHALL
- M&S SIMPLY FOOD
- MCCOLLS
- MORRISONS
- SAINSBURYS
- SAINSBURYS LOCAL
- TESCO
- TESCO EXTRA

LLAY
Site Plan

Scale 1:100,000 - A3 Landscape - 05 February 2019



Appendix 3

Aldi Llay Household Survey

Good morning / afternoon / evening, I am from NEMS market research, an independent market research company, and we are conducting a short survey in the North Wrexham area about food and grocery shopping habits. Do you have time to answer some questions please? It will take about 4 minutes.

QA Are you person most responsible for food and grocery shopping in your household?

Yes
No

IF 'YES' – CONTINUE INTERVIEW.

IF 'NO' – ASK, COULD I SPEAK TO THE PERSON WHO IS RESPONSIBLE FOR MOST OF THE FOOD SHOPPING, IF NOT AVAILABLE THANK AND CLOSE INTERVIEW

READ OUT: Firstly we have some questions about food shopping. In answering these questions the location could be a store, a centre or the internet

Q01 In which store or centre do you normally do most of your households main food shopping?

DO NOT READ OUT. ONE ANSWER ONLY. IF THEY SAY VARIES ASK FOR THE PLACE THEY GO TO MORE OFTEN THAN OTHERS EVEN IF SLIGHTLY.

#Food Food List

C Others:

035 Other (PLEASE WRITE IN)

036 Internet / delivery

037 (Don't know / varies)

038 (Don't do this type of shopping)

GO TO Q02

GO TO Q03

GO TO CLOSE

GO TO CLOSE

Excluding those who do their main food shopping via the Internet at Q01:

Q02 How does your household normally travel to (STORE MENTIONED AT Q01)?

DO NOT READ OUT. ONE ANSWER ONLY.

1 Car / van (as driver)

2 Car / van (as passenger)

3 Bus, minibus or coach

4 Motorcycle, scooter or moped

5 Walk

6 Taxi

7 Train

8 Bicycle

9 Disability vehicle (scooter, wheelchair etc.)

A Other (PLEASE WRITE IN)

B (Don't know / varies)

Q03 How often do you visit (STORE MENTIONED AT Q01)?

DO NOT READ OUT. ONE ANSWER ONLY.

1 Everyday

2 4 to 6 times a week

3 2 or 3 times a week

4 Once a week

5 Once a fortnight

6 Once a month

7 Less frequently

8 (Don't know / varies)

Q04 What is the main reason you choose to use (STORE MENTIONED AT Q01)?

DO NOT PROMPT. ONE ANSWER ONLY.

001 Accessibility by public transport

002 Car parking provision

003 Choice of food goods available

004 Cleanliness

005 Close to other facilities

006 Delivery service

007 Easy to get to by car

008 Good internal layout

009 Good service / friendly staff

010 Habit / always use it

011 Internet shopping is convenient

012 Lower prices

013 Loyalty card / points scheme

014 Near to home

015 Near to work

016 Preference for the retailer

017 Quality of food goods available

018 Staff discount / work there

019 Value for money

020 Other (PLEASE WRITE IN)

021 (Don't know / no reason in particular)

Excluding those who do their main food shopping via the Internet at Q01:

Q05 When you undertake your main food and grocery shopping at (LOCATION MENTIONED AT Q01), do you or other members of your household usually visit other shops, services, or leisure facilities on the same shopping trip?

DO NOT PROMPT. CAN BE MULTICODED. PROBE FULLY. Anything else?

- 1 Yes - buying fuel
- 2 Yes - leisure activity (excludes visiting swimming pool)
- 3 Yes - visit swimming pool
- 4 Yes - non-food shopping
- 5 Yes - other food shopping
- 6 Yes - travelling to / from school / college / university
- 7 Yes - travelling to / from work
- 8 Yes - visiting café / pub / restaurant
- 9 Yes - visiting family / friends
- A Yes - visiting financial service such as bank, building society, Post Office
- B Yes - visiting health service such as doctor, dentist, hospital
- C Yes - visiting other service such as laundrette, hairdresser, recycling
- D Yes - visiting the market
- E Yes - Other (PLEASE WRITE IN)
- F Window shopping / browsing
- G No
- H (Don't know)

Q06 Apart from (STORE MENTIONED AT Q01), which other store or centre do you normally do most of your households main food shopping?

DO NOT READ OUT. ONE ANSWER ONLY. IF THEY SAY VARIES ASK FOR THE PLACE THEY GO TO MORE OFTEN THAN OTHERS EVEN IF SLIGHTLY.

- | | | |
|-------|-------------------------|------------------|
| #Food | Food List | GO TO Q07 |
| C | Others: | |
| 035 | Other (PLEASE WRITE IN) | GO TO Q07 |
| 036 | Internet / delivery | GO TO Q08 |
| 037 | (Don't know / varies) | GO TO Q11 |
| 038 | (Nowhere else) | GO TO Q11 |

Those who do their main food shopping at another location (excluding via the Internet) at Q06:

Q07 How does your household normally travel to (STORE MENTIONED AT Q06)?

DO NOT READ OUT. ONE ANSWER ONLY.

- 1 Car / van (as driver)
- 2 Car / van (as passenger)
- 3 Bus, minibus or coach
- 4 Motorcycle, scooter or moped
- 5 Walk
- 6 Taxi
- 7 Train
- 8 Bicycle
- 9 Disability vehicle (scooter, wheelchair etc.)
- A Other (PLEASE WRITE IN)
- B (Don't know / varies)

Those who do their main food shopping at another location at Q06:

Q08 How often do you visit (STORE MENTIONED AT Q06)?

DO NOT READ OUT. ONE ANSWER ONLY.

- 1 Everyday
- 2 4 to 6 times a week
- 3 2 or 3 times a week
- 4 Once a week
- 5 Once a fortnight
- 6 Once a month
- 7 Less frequently
- 8 (Don't know / varies)

Those who do their main food shopping at another location at Q06:

Q09 What is the main reason you choose to use (STORE MENTIONED AT Q06)?

DO NOT PROMPT. ONE ANSWER ONLY.

- 001 Accessibility by public transport
- 002 Car parking provision
- 003 Choice of food goods available
- 004 Cleanliness
- 005 Close to other facilities
- 006 Delivery service
- 007 Easy to get to by car
- 008 Good internal layout
- 009 Good service / friendly staff
- 010 Habit / always use it
- 011 Internet shopping is convenient
- 012 Lower prices
- 013 Loyalty card / points scheme
- 014 Near to home
- 015 Near to work
- 016 Preference for the retailer
- 017 Quality of food goods available
- 018 Staff discount / work there
- 019 Value for money
- 020 Other (PLEASE WRITE IN)

021 (Don't know / no reason in particular)

Those who do their main food shopping at another location at Q06:

Q10 When you undertake your main food and grocery shopping at (LOCATION MENTIONED AT Q06), do you or other members of your household usually visit other shops, services, or leisure facilities on the same shopping trip?

DO NOT PROMPT. CAN BE MULTICODED. PROBE FULLY. Anything else?

- 1 Yes - buying fuel
- 2 Yes - leisure activity (excludes visiting swimming pool)
- 3 Yes - visit swimming pool
- 4 Yes - non-food shopping
- 5 Yes - other food shopping
- 6 Yes - travelling to / from school / college / university
- 7 Yes - travelling to / from work
- 8 Yes - visiting café / pub / restaurant
- 9 Yes - visiting family / friends
- A Yes - visiting financial service such as bank, building society, Post Office
- B Yes - visiting health service such as doctor, dentist, hospital
- C Yes - visiting other service such as laundrette, hairdresser, recycling
- D Yes - visiting the market
- E Yes - Other (PLEASE WRITE IN)
- F Window shopping / browsing
- G No
- H (Don't know)

Q11 Where do YOU normally go for most for your household small scale top-up shopping?

DO NOT READ OUT. ONE ANSWER ONLY. IF THEY SAY VARIES ASK FOR THE PLACE THEY GO TO MORE OFTEN THAN OTHERS EVEN IF SLIGHTLY.

- #Food Food List
- C **Others:**
- 035 Other (PLEASE WRITE IN)
- 036 Internet / delivery
- 037 (Don't know / varies)
- 038 (Don't do)

GO TO Q15

Those who do top-up shopping at Q11:

Q12 How often do you usually do your top-up food shopping?
DO NOT READ OUT. ONE ANSWER ONLY.

- 1 Everyday
- 2 4 to 6 times a week
- 3 2 or 3 times a week
- 4 Once a week
- 5 Once a fortnight
- 6 Once a month
- 7 Less frequently
- 8 (Don't know / varies)

Those who do top-up shopping (excluding via the Internet) at Q11:

Q13 What is the main reason why you choose (LOCATION MENTIONED AT Q11) for your top-up shopping?
DO NOT PROMPT. ONE ANSWER ONLY.

- 001 Accessibility by public transport
- 002 Car parking provision
- 003 Choice of food goods available
- 004 Cleanliness
- 005 Close to other facilities
- 006 Delivery service
- 007 Easy to get to by car
- 008 Good internal layout
- 009 Good service / friendly staff
- 010 Habit / always use it
- 011 Internet shopping is convenient
- 012 Lower prices
- 013 Loyalty card / points scheme
- 014 Near to home
- 015 Near to work
- 016 Preference for the retailer
- 017 Quality of food goods available
- 018 Staff discount / work there
- 019 Value for money
- 020 Other (PLEASE WRITE IN)
- 021 (Don't know / no reason in particular)

Those who do top-up shopping (excluding via the Internet) at Q11:

Q14 How does your household normally travel to (LOCATION MENTIONED AT Q11)?
DO NOT READ OUT. ONE ANSWER ONLY.

- 1 Car / van (as driver)
- 2 Car / van (as passenger)
- 3 Bus, minibus or coach
- 4 Motorcycle, scooter or moped
- 5 Walk
- 6 Taxi
- 7 Train
- 8 Bicycle
- 9 Disability vehicle (scooter, wheelchair etc.)
- A Other (PLEASE WRITE IN)
- B (Don't know / varies)

Those who do top-up shopping (excluding via the Internet) at Q11:

Q15 When you undertake your top-up shopping at (LOCATION MENTIONED AT Q11), do you or other members of your household usually visit other shops, services, or leisure facilities on the same shopping trip?
DO NOT PROMPT. CAN BE MULTICODED.

- 1 Yes - buying fuel
- 2 Yes - leisure activity (excludes visiting swimming pool)
- 3 Yes - visit swimming pool
- 4 Yes - non-food shopping
- 5 Yes - other food shopping
- 6 Yes - travelling to / from school / college / university
- 7 Yes - travelling to / from work
- 8 Yes - visiting café / pub / restaurant
- 9 Yes - visiting family / friends
- A Yes - visiting financial service such as bank, building society, Post Office
- B Yes - visiting health service such as doctor, dentist, hospital
- C Yes - visiting other service such as laundrette, hairdresser, recycling
- D Yes - visiting the market
- E Yes - Other (PLEASE WRITE IN)
- F Window shopping / browsing
- G No
- H (Don't know)

Those who do top-up shopping at Q11:

Q16 And apart from (LOCATION MENTIONED AT Q11), where else do normally go for most for your household small scale top-up shopping?
DO NOT READ OUT. ONE ANSWER ONLY. IF THEY SAY VARIES ASK FOR THE PLACE THEY GO TO MORE OFTEN THAN OTHERS EVEN IF SLIGHTLY.

- #Food Food List
- C **Others:**
- 035 Other (PLEASE WRITE IN)
- 036 Internet / delivery
- 037 (Don't know / varies)
- 038 (Nowhere else)

GO TO Q20

Those who do top-up shopping (excluding via the Internet) at another location at Q16:

Q17 What is the main reason why you choose (LOCATION MENTIONED AT Q16) for your top-up shopping?
DO NOT PROMPT. ONE ANSWER ONLY.

- 001 Accessibility by public transport
- 002 Car parking provision
- 003 Choice of food goods available
- 004 Cleanliness
- 005 Close to other facilities
- 006 Delivery service
- 007 Easy to get to by car
- 008 Good internal layout
- 009 Good service / friendly staff
- 010 Habit / always use it
- 011 Internet shopping is convenient
- 012 Lower prices
- 013 Loyalty card / points scheme
- 014 Near to home
- 015 Near to work
- 016 Preference for the retailer
- 017 Quality of food goods available
- 018 Staff discount / work there
- 019 Value for money
- 020 Other (PLEASE WRITE IN)
- 021 (Don't know / no reason in particular)

Those who do top-up shopping (excluding via the Internet) at another location at Q16:

Q18 How does your household normally travel to (LOCATION MENTIONED AT Q16)?
DO NOT READ OUT. ONE ANSWER ONLY.

- 1 Car / van (as driver)
- 2 Car / van (as passenger)
- 3 Bus, minibus or coach
- 4 Motorcycle, scooter or moped
- 5 Walk
- 6 Taxi
- 7 Train
- 8 Bicycle
- 9 Disability vehicle (scooter, wheelchair etc.)
- A Other (PLEASE WRITE IN)
- B (Don't know / varies)

Those who do top-up shopping (excluding via the Internet) at another location at Q16:

Q19 When you undertake your top-up shopping at (LOCATION MENTIONED AT Q16), do you or other members of your household usually visit other shops, services, or leisure facilities on the same shopping trip?
DO NOT PROMPT. CAN BE MULTICODED.

- 1 Yes - buying fuel
- 2 Yes - leisure activity (excludes visiting swimming pool)
- 3 Yes - visit swimming pool
- 4 Yes - non-food shopping
- 5 Yes - other food shopping
- 6 Yes - travelling to / from school / college / university
- 7 Yes - travelling to / from work
- 8 Yes - visiting café / pub / restaurant
- 9 Yes - visiting family / friends
- A Yes - visiting financial service such as bank, building society, Post Office
- B Yes - visiting health service such as doctor, dentist, hospital
- C Yes - visiting other service such as laundrette, hairdresser, recycling
- D Yes - visiting the market
- E Yes - Other (PLEASE WRITE IN)
- F Window shopping / browsing
- G No
- H (Don't know)

Q20 Do you ever visit Llay Town Centre?
ONE ANSWER ONLY.

- 1 Yes
- 2 No

GO TO Q21
GO TO Q23

Those who visit Llay town centre at Q20:

Q21 What other shops / services do you use / visit whilst visiting Llay town centre?
DO NOT PROMPT. CAN BE MULTI-CODED. PROBE FULLY. Anything else?

1 Food shopping (PLEASE WRITE IN STORE DETAILS)

2 Non-food shopping

3 Healthcare (e.g. doctor, dentist, optician)

4 Visit swimming pool

5 Social / leisure reason (e.g. meeting friends, going to gym etc.)

6 To have a walk / stroll around

7 To use services (e.g. bank, post office, hairdresser etc.)

8 To visit a restaurant / café / public house

9 Tourism (e.g. holiday, day trip etc.)

A Window shopping

B Work / business purposes

C Other (PLEASE WRITE IN)

D (Don't know / cant remember)

Those who visit Llay Town Centre at Q20:

Q22 How often do you usually visit Llay Town Centre?
DO NOT READ OUT. ONE ANSWER ONLY.

1 Everyday

2 4 to 6 times a week

3 2 or 3 times a week

4 Once a week

5 Once a fortnight

6 Once a month

7 Less frequently

8 (Don't know / varies)

Q23 Would you like to see a new supermarket in your local area?
ONE ANSWER ONLY

1 Yes

2 No

3 Undecided

Q24 Would you like to see a new discount supermarket in your local area?
ONE ANSWER ONLY

1 Yes

2 No

3 Undecided

Q25 If a new discount supermarket was to be in your local area, how likely to use it would you be?
READ OUT. ONE ANSWER ONLY

1 Very likely

2 Quite likely

3 Not very likely

4 Not at all likely

5 (Don't know)

GEN Gender of respondent:
DO NOT READ OUT. CODE FROM OBSERVATION

1 Male

2 Female

AGE Could I ask how old you are please?
DO NOT READ OUT. ONE ANSWER ONLY.

1 18 – 24 years

2 25 – 34 years

3 35 – 44 years

4 45 – 54 years

5 55 – 64 years

6 65+ years

7 (Refused)

Thank & close

Appendix 4

Proposed Aldi Store

Llay

Table 1: Population & Spending

	Population	Spending	
		Per Caput (£)	Total (£ m)
2018	31,377	£2,434	£68.27
2019	31,547	£2,461	£77.63
2020	31,718	£2,483	£78.75
2021	31,890	£2,518	£80.29
2022	32,063	£2,568	£82.34
2023	32,237	£2,625	£84.61
2024	32,412	£2,680	£86.85

Note: Population estimates derived from CACI data

Personal spending estimate taken from CACI data

Expenditure growth rates taken provided by CACI

2018 Price Base

Proposed Aldi Store

Llay

Table 2: Market Shares

Store or Centre	Main	Top-up	Total
Within Study Area			
Local shops, Llay	0.00%	10.96%	3.73%
Gwersyllt Centre	11.53%	21.71%	14.99%
Meadow Express, The Meadows, Gwersyllt	0.00%	2.73%	0.93%
Spar, First Avenue, Gwersyllt	0.00%	2.57%	0.87%
Spar, Park Wall Service Station, Mold Road, Gwersyllt	0.00%	3.47%	1.18%
Local shops, Gresford	0.00%	0.46%	0.16%
Dickens Butchers, Chester Road, Gresford	0.00%	1.73%	0.59%
Spar, Chester Road, Gresford	0.00%	5.03%	1.71%
Co-op, Marford Hill, Marford	0.14%	7.81%	2.75%
Co-op, Chester Road, Rossett	0.35%	3.46%	1.41%
Premier Village Stores, Chester Road, Rossett	0.00%	1.57%	0.53%
Premier, Fagl Lane, Hope	0.00%	0.95%	0.32%
Spar, High Street, Caergwrle	0.18%	8.87%	3.14%
Total Study Area	12.20%	71.32%	32.30%
Outside Study Area			
Aldi, Plas Coch Retail Park, Wrexham	14.59%	3.28%	10.75%
Asda, Holt Road, Wrexham	14.41%	4.74%	11.12%
Morrisons, Ruthin Road, Wrexham	5.26%	0.75%	3.72%
Sainsbury's Superstore, Plas Coch Retail Park, Wrexham	19.76%	4.56%	14.59%
Tesco Extra, Crescent Road, Wrexham	13.48%	1.11%	9.27%
Wrexham Town Centre	2.35%	1.42%	2.03%
Other Shops in Wrexham	2.73%	6.32%	3.95%
Other Shops Outside Study Area	10.12%	6.51%	8.89%
Total Shops Outside Study Area	82.69%	28.68%	64.33%
Internet / delivery	5.11%	0.00%	3.37%
Total	100.00%	100.00%	100.00%

Proposed Aldi Store

Llay

Table 3: Turnover of Existing Facilities in 2019 (£ m)

	Turnover		
Store or Centre	Main	Top-up	All
Within Study Area			
Local shops, Llay	£0.00	£2.89	£2.89
Gwersyllt Centre	£5.91	£5.73	£11.64
Meadow Express, The Meadows, Gwersyllt	£0.00	£0.72	£0.72
Spar, First Avenue, Gwersyllt	£0.00	£0.68	£0.68
Spar, Park Wall Service Station, Mold Road, Gwersyllt	£0.00	£0.92	£0.92
Local shops, Gresford	£0.00	£0.12	£0.12
Dickens Butchers, Chester Road, Gresford	£0.00	£0.46	£0.46
Spar, Chester Road, Gresford	£0.00	£1.33	£1.33
Co-op, Marford Hill, Marford	£0.07	£2.06	£2.13
Co-op, Chester Road, Rossett	£0.18	£0.91	£1.09
Premier Village Stores, Chester Road, Rossett	£0.00	£0.41	£0.41
Premier, Fagl Lane, Hope	£0.00	£0.25	£0.25
Spar, High Street, Caergwrle	£0.09	£2.34	£2.44
Total Study Area	£6.25	£18.82	£25.07
Outside Study Area			
Aldi, Plas Coch Retail Park, Wrexham	£7.48	£0.87	£8.34
Asda, Holt Road, Wrexham	£7.38	£1.25	£8.63
Morrisons, Ruthin Road, Wrexham	£2.69	£0.20	£2.89
Sainsbury's Superstore, Plas Coch Retail Park, Wrexham	£10.12	£1.20	£11.33
Tesco Extra, Crescent Road, Wrexham	£6.91	£0.29	£7.20
Wrexham Town Centre	£1.20	£0.37	£1.58
Other Shops in Wrexham	£1.40	£1.67	£3.06
Other Shops Outside Study Area	£5.19	£1.72	£6.90
Total Shops Outside Study Area	£42.37	£7.57	£49.94
Internet / delivery	£2.62	£0.00	£2.62
Total	£51.24	£26.39	£77.63

Note:

Assumes 66:34 split between main and top-up spending

Proposed Aldi Store
Llay

Table 4: Convenience Goods Turnover of Proposed Store

Sales Floorspace (sq m)			Sales Density (£/sq.m)	Turnover (£ m)		
Total	Comparison	Convenience		2019	2021	2024
1,315	263	1,052	£10,190	£10.7	£10.8	£10.9

Assumes convenience goods sold from 80% of sales floorspace
Sales Density Derived from Mintel Retail Rankings

Proposed Aldi Store
Llay

Table 5: Convenience Goods Retail Need

	2021	2024
Growth in Local Spending	£12.02	£18.58
Leakage	£51.65	£55.87
Capacity	£63.67	£74.45

Local Spending taken from Table 3

Leakage taken from Table 5

Proposed Aldi Store

Llay

Table 6: Trade Diversion at 2021

Store or Centre	Trade Diversion	
	%	£ m
Within Study Area		
Local shops, Llay	0.6%	£0.07
Gwersyllt Centre	7.4%	£0.80
Meadow Express, The Meadows, Gwersyllt	0.1%	£0.01
Spar, First Avenue, Gwersyllt	0.1%	£0.01
Spar, Park Wall Service Station, Mold Road, Gwersyllt	0.1%	£0.01
Local shops, Gresford	0.0%	£0.00
Dickens Butchers, Chester Road, Gresford	0.0%	£0.00
Spar, Chester Road, Gresford	0.1%	£0.01
Co-op, Marford Hill, Marford	0.3%	£0.03
Co-op, Chester Road, Rossett	0.7%	£0.07
Premier Village Stores, Chester Road, Rossett	0.0%	£0.00
Premier, Fagl Lane, Hope	0.0%	£0.00
Spar, High Street, Caergwrle	0.3%	£0.03
Total Study Area	9.6%	£1.04
Outside Study Area		
Aldi, Plas Coch Retail Park, Wrexham	14.0%	£1.52
Asda, Holt Road, Wrexham	17.3%	£1.88
Morrisons, Ruthin Road, Wrexham	5.7%	£0.62
Sainsbury's Superstore, Plas Coch Retail Park, Wrexham	21.2%	£2.30
Tesco Extra, Crescent Road, Wrexham	13.6%	£1.47
Wrexham Town Centre	2.8%	£0.30
Other Shops in Wrexham	2.4%	£0.26
Other Shops Outside Study Area	8.4%	£0.91
Total Shops Outside Study Area	85.4%	£9.25
Inflow	5.0%	£0.54
Total	100.0%	£10.84

Proposed Aldi Store
Llay

Table 7: Impact

Store or Centre	Turnover (£ m)		Diversion (£ m)	Residual Turnover	Impact
	2019	2021			
Within Study Area					
Local shops, Llay	£3.04	£3.14	£0.07	£3.07	-2.30%
Gwersyllt Centre	£13.38	£13.84	£0.80	£13.04	-5.96%
Meadow Express, The Meadows, Gwersyllt	£0.76	£0.78	£0.01	£0.78	-0.84%
Spar, First Avenue, Gwersyllt	£0.71	£0.74	£0.01	£0.73	-0.84%
Spar, Park Wall Service Station, Mold Road, Gwersyllt	£0.96	£0.99	£0.01	£0.99	-0.84%
Local shops, Gresford	£0.13	£0.13	£0.00	£0.13	-0.69%
Dickens Butchers, Chester Road, Gresford	£0.48	£0.50	£0.00	£0.49	-0.69%
Spar, Chester Road, Gresford	£1.39	£1.44	£0.01	£1.43	-0.70%
Co-op, Marford Hill, Marford	£2.24	£2.31	£0.03	£2.29	-1.26%
Co-op, Chester Road, Rossett	£1.15	£1.19	£0.07	£1.12	-6.34%
Premier Village Stores, Chester Road, Rossett	£0.43	£0.45	£0.00	£0.44	-0.95%
Premier, Fagl Lane, Hope	£0.26	£0.27	£0.00	£0.27	-0.74%
Spar, High Street, Caergwrle	£2.56	£2.64	£0.03	£2.61	-1.25%
Total Study Area	£39.71	£41.07	£1.93	£39.14	-1.44%
Outside Study Area					
Aldi, Plas Coch Retail Park, Wrexham	£30.70	£31.72	£1.52	£30.20	-4.95%
Asda, Holt Road, Wrexham	£63.04	£65.12	£1.88	£63.25	-2.97%
Morrisons, Ruthin Road, Wrexham	£37.13	£38.36	£0.62	£37.74	-1.67%
Sainsbury's Superstore, Plas Coch Retail Park, Wrexham	£52.84	£54.59	£2.30	£52.29	-4.35%
Tesco Extra, Crescent Road, Wrexham	£49.88	£49.88	£1.47	£48.41	-2.95%
Wrexham Town Centre	£18.39	£19.02	£0.30	£18.72	-1.63%
Other Shops in Wrexham	£3.06	£3.17	£0.26	£2.91	N/A
Other Shops Outside Study Area	£6.90	£7.14	£0.91	£6.23	N/A
Total Shops Outside Study Area	£261.94	£268.99	£9.25	£259.74	N/A
Total	£301.65	£310.06	£11.19	£298.87	

Turnover of destinations within Study Area allows for inflow expenditure of 5% of survey derived turnover

Turnover of destinations outside Study Area derived from Wrexham Retail Study 2014



JLL Planning and Development

Landmark
One Oxford Street
Manchester
M1 4PB

+44(0)161 828 6440

<https://internetadmin.jll.com/united-kingdom/en-gb>

Jones Lang LaSalle

©2019 Jones Lang LaSalle IP, Inc. All rights reserved. All information contained herein is from sources deemed reliable; however, no representation or warranty is made to the accuracy thereof.