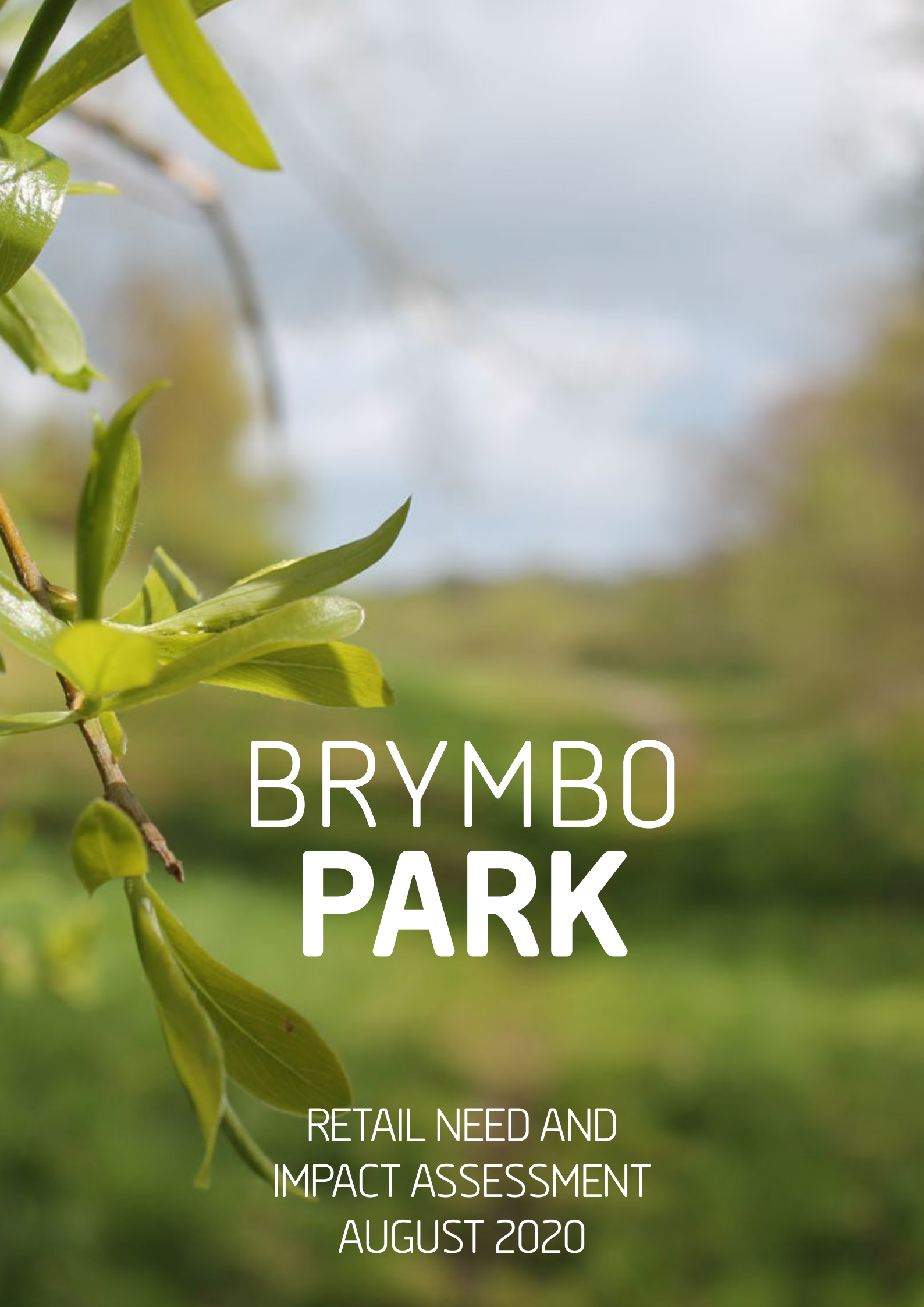




# BRYMBO **PARK**

RETAIL NEED AND  
IMPACT ASSESSMENT  
AUGUST 2020

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# Retail Need & Impact Assessment

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## Brymbo Park, Wrexham

Outline planning permission for up to 300 dwellings (Class C3 use), provision of a primary school (2-form entry), small district centre comprising up to 1,395 sq. m of Class A1 Retail, up to 372 sq. m of Class A3 Restaurant/Public House, up to 465 sq. m of Class D1 use, multi-functional green infrastructure, including informal open space, surface water attenuation, vehicle accesses, car parking, engineering works, public footpaths and hard and soft landscaping, underground services, and all ancillary and enabling works, with all matters reserved except for access.

Brymbo Developments Limited

# Retail Need & Impact Statement

Brymbo Park, Wrexham

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## 1. Introduction

### Introduction and Executive Summary

- 1.1 Savills (UK) Limited have been appointed to prepare a Retail Need & Impact Statement (the '**Statement**') on behalf of Brymbo Developments Limited, in support of a proposed mixed-use development at the Brymbo Park site.
- 1.2 The application proposes a residential led, mixed-use development for up to 300 dwellings, the provision of a primary school and a small district centre as well as multi-functional green infrastructure.
- 1.3 The small, centrally located district centre will provide sustainable retail and community facilities and provide a cohesive link between the existing communities to the north and south of Brymbo, in addition to the current residential proposals.
- 1.4 The Statement has been prepared to specifically address matters relating to retail planning policy in Wales, namely the requirement contained in Planning Policy Wales Edition 10 (December 2018) to undertake an assessment of both the need for and the impact of a proposed retail development. All other planning policy and development management considerations, are addressed in Barton Willmore's Planning Statement, included in the application documents.
- 1.5 The Statement demonstrates that:
  1. The proposal will serve a local area comprising both the existing and proposed residential areas in Brymbo. There are no defined centres that serve this residential area.
  2. There is a significant quantitative need for additional convenience goods retail floorspace in Wrexham. Even taking into account the retail floorspace proposed as part of this application, there will remain £63.2m of surplus expenditure to support new convenience goods retail floorspace in Wrexham.

3. The existing convenience goods retail stores in Wrexham are substantially over-trading, which supports the case that there is a significant under provision of convenience goods retail floorspace in Wrexham.
4. The clear quantitative need for the floorspace demonstrates that there are qualitative deficiencies in terms of the provision of convenience goods floorspace in Wrexham.
5. There is not currently a notable foodstore located with the residential area that the proposal will serve. The proposed development therefore provides an opportunity to retain expenditure within existing catchments, and represents a more sustainable form of development given it will reduce the need for residents of Brymbo to travel by car in order to purchase convenience goods.
6. The small-scale nature and scale of the proposed retail facilities means that the amount of trade diverted from existing stores is negligible (especially when accounting for the degree to which stores are currently overtrading). It follows that the proposed development represents no threat to the vitality and viability of Wrexham town centre or any other centre in the adopted retail hierarchy.

### **The Application Site & Planning History**

- 1.6 The application site occupies an area of the former Brymbo Steelworks industrial site, some of which has already been redeveloped. There are existing residential properties to the north, south and east, emphasizing the central location of the site in the context of the settlement of Brymbo.
- 1.7 The Site has been re-graded into a plateau separated from the west by a steeply sloping bank. This lower plateau has significantly less vegetative cover with a newly created road, Phoenix Drive, running through it north to south.
- 1.8 The site has been remediated following the cessation of the previous industrial use and is primed for redevelopment. Whilst it was originally envisioned that the redevelopment of the eastern portion of the site would be for employment purposes, it went to market and no demand was identified for this type of development, despite planning permission being granted to that effect in March 2006 (Ref: P/2005/1485).

- 1.9 Since that time, the Applicant has focused on a master planned redevelopment of the entire site to deliver a significant number of residential dwellings, along with a small district centre, primary school and enabling development focused on the needs of the community of Brymbo. The up-to-date Brymbo Park masterplan is attached at **Appendix 1**.
- 1.10 In July 2014, outline planning permission was granted for the erection of a supermarket (1,672 sq. m) and six small retail units (558 sq. m) at the application site (App Ref: P/2012/0816) (the '**2014 Permission**'), which is identified as the location of the small district centre in the masterplan. Whilst there was a clear intention on behalf of the Applicant to bring the proposed development forward at the time of the grant of planning permission, no commercial agreement could be reached to allow a retailer to occupy the space, and the permission has subsequently lapsed.
- 1.11 In June 2018, the Applicant appointed Savills Retail & Leisure Research Consultancy ('**Savills Research**') to conduct a study to determine what type of operator might be attracted to operate from the site, and what amount of floorspace would be most viable. Savills Research conducted a detailed analysis of the catchment area and the likely level of demand for additional convenience goods retail floorspace, and concluded that the proposed District Centre was most likely able to support a foodstore in the range of 10,000 – 15,000 sq. ft, with up to an additional 20,000 sq. ft of retail/ leisure floorspace being capable of being supported.

### The Proposal

- 1.12 The proposal seeks planning permission for mixed-use development, comprising the following elements:
1. Up to 300 (Class C3) residential dwellings;
  2. A convenience goods foodstore within Class A1, up to 930 sq. m;
  3. Other complementary retail and commercial uses within Use Classes A1 – A3, up to 465 sq. m.
    - a) A Public House/ Restaurant (Class A3), up to 372 sq. m;
    - b) Healthcare/ other non-residential use (Class D1), up to 465 sq. m; and
    - c) A Primary School (Class D1).

# Retail Need & Impact Statement

Brymbo Park, Wrexham

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- 1.13 In order to retain maximum flexibility, the application seeks outline planning permission to establish the principle of the development at this stage, with all matters reserved except access.
- 1.14 The proposed retail floorspace is small-scale by modern standards. It can only provide a very localised offer for residents in an immediate catchment of the Brymbo residential area. Given the scale of the proposed foodstore, it is clear that it will not compete for trade directly with established main food retailers in surrounding areas, but will perform a much more localised function supporting both the residents of the new development and the existing Brymbo residential area. At 465 sq. m, the smaller-scale retail uses within Classes A1 – A3 can also only serve a localised function providing small-scale retail and service provision for residents of the development and the Brymbo residential areas. The scale of retail can only be regarded as serving a small 'District Centre' style function serving the Brymbo area.
- 1.15 As above, the proposed restaurant/ public house is also intended to perform a purely local function within the district centre and will not result in any impact upon similar premises located in surrounding centres.

## Context to the Proposals

- 1.16 It is important to note that, whilst no longer extant, the 2014 Permission allowed a greater quantum of retail and leisure floorspace at the application site than is the subject of the current proposals. It follows that at the time of the grant, the Council accepted there was a demonstrable need for a much larger foodstore at the site, which was shown not to have a significant adverse impact upon the vitality of surrounding centres.
- 1.17 Given that the current proposals seek permission for a smaller convenience goods foodstore and lower overall quantum of retail floorspace, it follows that the application could only fail the test of impact if one of more of the surrounding centres had become more vulnerable, due to the cumulative impact of subsequent out of centre proposals. Furthermore, the proposed development could only fail the needs test if all of the latent demand that existed at the time of the grant of the 2014 Permission had since been absorbed by the development of other stores.

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1.18 It is clear from comprehensive pre-application discussions that the proposed development, including the provision of a district centre, has received widespread support from the residents of Brymbo. The proposals are sustainably located, providing a significant number and range of housing to meet a diversity of local needs as well as a small district centre and primary school to provide for the needs of local residents of the development and immediate surrounding residential areas of Brymbo.

## Structure of this Statement

1.19 This Statement assesses the compliance of the Class A1 retail floorspace and associated retail and commercial uses within Use Classes A1 – A3 floorspace against the main policy requirements set out in national policy and the local development plan. The Statement is structured as follows:

- Section 2 – Retail Policy Background
- Section 3 – Assessment of Retail Need
- Section 4 – Assessment of Potential Impact
- Section 5 – Conclusions

## 2. Retail Policy Background

### National Policy Background

- 2.1 Planning Policy for Wales Edition 10 (**'PPW'**), published December 2018, is the main policy document for Wales, and advises upon the approach to planning at development plan and application stage. Section 4.3 of PPW relates to 'Retail and Commercial Development', which contains the Welsh Government's objectives for protecting, developing and maintaining retail development and the 'town centre first' approach.
- 2.2 Paragraph 4.3.15 states that, in establishing whether a need exists outside existing centres, this may be quantitative or qualitative in nature. Quantitative need addresses unmet demand for the provision concerned, whilst qualitative need includes both positive and negative considerations including the degree to which it supports the objectives of the retail strategy, the accessibility of the site, whether it contributes to a reduction in car journeys and if it adds to the attractiveness and vibrancy of a centre.
- 2.3 In relation to retail impact, Paragraph 4.3.26 of the PPW states that all schemes involving retail development in excess of 2,500 sq. m floorspace (gross) should be supported by a retail impact assessment, once need has been established. For smaller proposals, the Local Planning Authority must decide whether an assessment is likely and may have a significant adverse impact. Whilst the development proposed by this application proposes less than 2,500 sq. m of retail floorspace, the Local Planning Authority has confirmed in earlier correspondence that a retail impact assessment will be required. The impact assessment and evidence base provided to support it is proportionate to the scale of the proposal as required by Paragraph 4.2.37 of PPW.
- 2.4 The PPW is supplemented by a series of topic-based Technical Advice Notes (**'TANs'**). TAN 4, published in November 2016, specifically relates to retail and commercial development. Objective 1 of TAN 4 reflects the 'town centre first' approach of the PPW and states that viable urban and rural retail and commercial centres need to be promoted as the most sustainable locations to live, work, shop, socialise and conduct business.

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- 2.5 Part 6 of TAN 4 sets out the tests of retail needs. The retail needs tests are of a quantitative and qualitative nature, and are required to be undertaken for any application in an edge-of-centre or out-of-centre location which is not in accordance with an adopted development plan. It is also notes that this is the starting point for planning new retail development in both development plans and development management.
- 2.6 Paragraph 6.3 of TAN 4 clarifies that there is no particular methodology prescribed by the Welsh Government, instead developers and LPAs are encouraged to prepare assessments in a clear logical and transparent way, with robust and realistic evidence. However, Paragraph 6.5 confirms that quantitative retail need should be established, before qualitative aspects of need are considered, arguing that the latter is harder to justify and will be subject to close scrutiny. It notes that the overall aim of assessing qualitative need is to achieve an appropriate distribution and range of sites for stores to meet the need of all communities, particularly where provision is inadequate.
- 2.7 Paragraph 8.2 outlines the requirements for retail impact assessments. It repeats the requirements of Paragraph 4.3.26 of the PPW.

## Local Policy Background

- 2.8 The Wrexham Unitary Development Plan ('UDP'), adopted on 14 February 2005, is the statutory planning development plan for the administrative area of Wrexham County Borough Council.
- 2.9 In addition to the above, the Council has recently submitted the final stages of adopting the Emerging Plan, which was submitted to the Welsh Government for Examination on 22 November 2018. Whilst the preparation of the Emerging Plan is at an advanced stage, only limited weight can be afforded to it.
- 2.10 Policy S6 of the UDP relates to 'Local Need Shopping', and states that small-scale shopping developments will be allowed within settlement limits, provided that:
- a) The development is safely accessible for customers on foot;
  - b) The development does not harm residential amenity and/ or does not give rise to traffic problems (e.g. on-street parking that cannot be addressed); and

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- c) The sales floor area of each development does not exceed 300 sq. m.

2.11 The Wrexham Local Development Plan ('**Emerging Plan**') is presently being Examined by an Inspector on behalf of the Ministers of the Welsh Government. It is not the adopted Local Development Plan and it is therefore considered that only limited weight can be applied to it.

## 3. Assessment of Retail Need

### Introduction

- 3.1 The starting point for the consideration of any application for retail development in Wales is the requirement to establish need. As confirmed above, need can be expressed in either quantitative or qualitative terms. However, the emphasis is placed on quantitative need especially in relation to convenience goods.
- 3.2 The most up-to-date retail evidence base is the Wrexham Retail Assessment ('**WRA**') (July 2014), undertaken by Peter Brett Associates. The WRA is a key document within the Council's Evidence Base for the Emerging Plan and is therefore a robust basis for assessing retailing patterns in the Borough, particularly given the small-scale nature and 'district' function of the proposed retail floorspace. Our assessment of the proposal is therefore based directly on the tables provided in the Council's WRA.

### Turnover of Proposal

- 3.3 The scale of the store has been designed based on market research, taking into account the number, location and trading patterns of existing convenience stores, which has provided the Applicant with an insight into the level of market demand for floorspace within the District Centre. As set out at Paragraph 1.10 above, the Local Planning Authority has previously supported an application for a large supermarket at the site.
- 3.4 In terms of sales density, we forecast a base density of £10,000 per sq. m for the foodstore. These figures match those used by PBA in the Retail Study in relation to the 2014 Permission (see Table 6.5 of the WRA) which were based on the Average Sales Density for the 'UK Top 10 supermarket operators'. The sales density used is therefore consistent with the Council's own evidence. We have not assessed the turnover of the smaller retail and commercial uses within Use Classes A1 – A3. There is no requirement in PPW to assess the need (or impact) for uses within Class A2 or A3. If that floorspace is used for Class A1 uses, at 465 sq. m, it can only serve a small-scale localised function. In any event, as demonstrated below, there is sufficient convenience and comparison goods floorspace capacity to accommodate the turnover of that floorspace is used for Class A1 purposes.

- 3.5 The proposed convenience store is envisioned to form a gross internal area of 930 sq. m, with a sales floor area estimated at 80% of the total (744 sq. m). Convenience goods retailers typically exhibit a gross to net floorspace ratio of around 70%, and therefore the figure of 744 sq. m is considered to be very robust<sup>1</sup>.
- 3.6 Using the above assumptions for sales density and sales floorspace, the calculated total turnover of the proposed convenience goods floorspace at 2020 is £7.44m, growing to £7.48m at 2023<sup>2</sup>. The turnover of the proposal is included at Table 1 of **Appendix 2**.

### Turnover of Existing Stores

- 3.7 We have taken the survey derived turnover of existing stores from Table 9a of the Council's Wrexham Retail Assessment.

### Commitments

- 3.8 The terms 'commitments' describes the number of developments for convenience goods retail which were either being developed or in the 'pipeline' at the time of the Wrexham Retail Assessment being undertaken in 2014. Those commitments taken into account by PBA at that time are shown at Tables 6.4 & 6.5 of the Wrexham Retail Assessment.
- 3.9 Since that time, a number of developments have been built out, in accordance with the relevant planning permissions, whilst others remain extant or are currently under development. This includes permissions listed as commitments in the Wrexham Retail Assessment, along with other developments which has since been granted planning permission. The up-to-date convenience goods commitments are shown in black on the upper part of Table 3 of **Appendix 2**.

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<sup>1</sup> For the purposes of this assessment, we have assumed that all of the sales floorspace will be used for the sale and display of convenience goods.

<sup>2</sup> 2023 has been used for the purposes of the assessment to enable a comparable assessment to be undertaken with the Council's own evidence base.

3.10 There are also two developments that were planned and benefited from permission at the time of the Wrexham Retail Assessment that have not progressed resulting in the expiry of planning permission. Table 3 of **Appendix 2** highlights the two proposed developments which were listed as commitments in the Wrexham Retail Assessment, which are no longer extant and therefore are not 'committed floorspace' that should be accounted for as part of our assessment.

3.11 As a result of the above, the turnover of relevant commitments equates to £64.2m at 2023.

### Quantitative Need

3.12 As provided at Paragraph 8.26 of the Retail Study, it was apparent to PBA at the time of the Wrexham Retail Assessment that a number of existing foodstores were trading at well beyond their expected baselines.

3.13 When taking account of the current level of overtrading, using the figures provided in the Retail Study it is clear that there is a very large surplus of expenditure contained within the Study Area of £134.9m at 2023 before taking account of commitments (see Table 4 of **Appendix 2**). This represents a significant portion of unmet demand for additional convenience goods floorspace in the area. After taking account of committed floorspace at 2023 there remains a quantitative need for additional floorspace of £70.7m.

3.14 As a result, it is evident that a quantitative need for additional convenience goods floorspace exists within Wrexham. It should be noted that this assessment does not include any allowances for increased availability of expenditure in the period between 2014 – 2018, and the assessment is therefore considered to constitute a broad minimum level of demand for retail floorspace in Wrexham. Even taking account of the turnover of the proposal at 2023, there remains £63.2m of expenditure to support new convenience goods retail floorspace in Wrexham (i.e. the turnover of the proposal (£7.48) deducted from the quantitative need for new floorspace (£83.3m) from Paragraph 3.13 above). That is a substantial level of quantitative capacity for convenience goods retailing in the town and there can be no doubt that a quantitative need exists for the proposal.

- 3.15 In addition to the above, even if the additional 465 sq. m of complementary retail and service floorspace were to be used for the sale of convenience or comparison goods in Class A1, there remains more than sufficient capacity to accommodate it based upon the figures provided in the Wrexham Retail Assessment.
- 3.16 There is therefore substantial capacity to accommodate new Class A1 retail floorspace proposed as part of the application.

### Qualitative Need

- 3.17 On a qualitative analysis, it can be seen that there is not currently a notable foodstore located within Zone 4 of the Wrexham Retail Assessment – which includes the application site and surroundings. The proposed development therefore provides an opportunity to retain expenditure within existing catchments, and represents a more sustainable form of development given it will reduce the need for residents of Brymbo to travel by car in order to purchase convenience goods. Similarly, the proposal provides an opportunity to retain expenditure within a localised catchment, and addresses a deficiency in local store provision.
- 3.18 As per Paragraph 4.3.16 of the PPW, the proposed development will therefore meet a qualitative need for additional convenience goods floorspace by:
- Contributing to a substantial reduction in car journeys;
  - Assisting in the alleviation of overtrading of, or traffic congestion surrounding, existing local comparable stores; and
  - Addressing local deficiencies in terms of quality and quantity, including that which would serve new residential development.

- 3.19 Furthermore, it is noted that the Council previously granted planning permission for a larger foodstore and associated smaller retail units at this site under the 2014 Permission. Since that time, whilst there has been additional convenience goods floorspace provided in the Wrexham Retail Assessment Study Area (especially with regard to discount retailers such as Aldi and Lidl) this has been of a modest scale when taking into account the level of overtrading and the additional floorspace identified to be provided in the Retail Study. In the interim period, demand for additional floorspace can only have grown as a result of both population and expenditure

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growth rates. Therefore, it is evident that a qualitative need for additional convenience goods floorspace exists in this specific location.

## Conclusion

3.20 As a result of the above assessment, and when considering planning history of the application site, the clear level of unmet demand for additional convenience goods retail floorspace in Wrexham, there is both a quantitative and qualitative need for the proposed Class A1 floorspace.

## 4. Assessment of Potential Impact

### Introduction

- 4.1 As outlined above at Section 2, Paragraph 8.2 of TAN 4 provides that all applications proposing in excess of 2,500 sq. m of additional retail floorspace in out-of-centre locations must be accommodated by an assessment of impact.
- 4.2 The Council has previously supported a number of applications for retail development where the floorspace has not exceeded 2,500 sq. m without an impact assessment, most recently in relation to the extension of the existing Aldi foodstore at Plas Coch Retail Park (App Ref: P/2018/0105).
- 4.3 Despite the above established position, based on initial discussions between the Applicant and the Council's Planning Officers in relation to the proposals we have undertaken an illustrative assessment in the interests of completeness (see Tables 5 – 7 at **Appendix 2**).
- 4.4 Given the role and function of the proposed retail floorspace serving a local catchment in the residential area of Brymbo, it cannot give rise to any significant adverse impacts on existing centres. There are no existing defined district or local centres serving the residential areas of Brymbo.
- 4.5 Further, there is a significant amount of identified need for additional convenience goods retail floorspace illustrated in Section 3 and a significant degree of overtrading in the existing stores. Accordingly, the starting point for the assessment of retail impact is that trade diverted from existing stores is that there can be no credible case that the proposal could result in a significant adverse impact given the significant identified need and small-scale local nature of the retail floorspace proposed.
- 4.6 Whilst the proposal also includes provision for up to 465 sq. m of complementary retail and service floorspace for use in Classes A1 – A3, we have not included this element of the proposal in our assessment of potential impact. There is no requirement to assess impact in relation to Class A2/ A3 uses, but even in the event that the entire 465 sq. m of proposed floorspace is used for retail uses in Class A1, it is of such a small scale that

it can only be complimentary to both the wider substantial residential development and the existing Brymbo residential area. It is not of a level which could give rise to any significant adverse impacts.

- 4.7 Our assessment of the potential impacts of the proposal therefore accord with the objectives of Paragraph 4.3.27 of the PPW, which states that assessments in relation to smaller developments should be proportionate to the potential impacts.

### Impact Assessment

- 4.8 The starting point for the consideration of the impact of the proposal is taken from the trading pattern of existing stores provided at Table 8b of the Wrexham Retail Assessment (duplicated at Table 5 of **Appendix 2**). Using the established trading pattern of those stores, we are able to forecast the impact of both the newly permitted stores (i.e. the commitments) and the proposed development.
- 4.9 The impact of the relevant commitments (shown at Table 3 of **Appendix 2**) is based upon the existing trading patterns of stores, the proximity of the commitments to those stores and the degree of 'overlap' between product offerings. Our assessment of the impact of those commitments is shown at Table 6 of **Appendix 2**.
- 4.10 It should be noted that since the time of the Wrexham Retail Assessment in 2014, the Tesco store on Dodds Lane, in Wrexham, has closed. For the purposes of this assessment, it has been assumed that all of the store's predicted turnover from the Wrexham Retail Assessment is absorbed into the turnover of existing stores and commitments (i.e. none of the turnover is directly attributed to the proposed development as that store had already closed by the time that this application has been submitted).
- 4.11 The assessment of the impact of commitments shows that, given the location of the new stores in primarily quite central locations (Retail Study zones 1 – 5), they will primarily draw trade from existing large-scale convenience food retailers in Wrexham, such as Tesco, Asda, Aldi and Morrisons. For example, the existing Aldi foodstore at Plas Coch Retail Park is envisioned to be subject to trade draw, given that all of the commitments are discount retailers offering a similar product type to Aldi.

- 4.12 The assessment of the potential retail impact (see Table 7 of **Appendix 2**) of the proposed development is expressed as a percentage of the residual turnover of existing stores within the Study Area which is diverted to the proposal in the design year (i.e. 2023).
- 4.13 Given the nature of the proposed foodstore at the application site, it will primarily compete with smaller convenience stores and discount foodstores located in close proximity to the application site. Given the lack of similar retailers in Zone 4 of the Wrexham Retail Assessment, it is predicted that the proposed development will primarily draw from Aldi at Plas Coch Retail Park (resulting in a 5.3% impact), and the Sainsbury's (2.1%) and Asda (1.8%) store in Wrexham. None of those stores are located within the adopted town centre boundary and as such are not afforded any protection by planning policy.
- 4.14 In addition to the above, the proposal will also draw some trade from existing small convenience stores located in Zones 1 – 4, listed at Table 7 of **Appendix 2** as 'Other Destinations', given the similarities in the types of goods offered for sale at these stores. Whilst the impact of the proposal on these stores is slightly higher (especially in Zone 4 at 13.1%), these are also not located within an existing centre and are not protected by policy.

### Conclusion

- 4.15 As a result of the nature and scale of the proposed development, the amount of trade diverted from existing stores is negligible (especially when accounting for the degree to which stores are currently overtrading). It follows that the proposed development represents no threat to the vitality and viability of Wrexham town centre or any other centre in the adopted retail hierarchy.

## 5. Conclusions

- 5.1 This Retail Need & Impact Statement has been prepared by Savills (UK) Ltd in support of a proposed mixed-use development at the Brymbo Park site. The application proposes a residential led, mixed-use development for up to 300 dwellings, the provision of a primary school and a small district centre as well as multi-functional green infrastructure.
- 5.2 The Statement has been prepared to specifically address matters relating to retail planning policy in Wales, namely the requirement contained in Planning Policy Wales Edition 10 (December 2018) to undertake an assessment of both the need for and the impact of a proposed retail development. All other planning policy and development management concerns considerations, are addressed in Barton Willmore's Planning Statement, included with the submission documents.
- 5.3 Our assessment, based on evidence provided in the Council's Wrexham Retail Assessment (2014), provides that there exists both a quantitative and qualitative need for the proposed convenience goods floorspace proposed under this application. The very high amount of surplus expenditure identified in the Retail Assessment as a result of the overtrading of existing stores is itself a clear indication that additional convenience goods floorspace is required.
- 5.4 In terms of qualitative indicators, the proposal presents an opportunity to provide a foodstore serving local residents of Brymbo, thereby reducing the overall need to travel and the number and distance of car trips. In addition, the proposal will deliver and enable a more sustainable form of development through the creation of a small, centrally located district centre will providing retail and community facilities which form a cohesive link between the existing communities to the north and south of Brymbo, in addition to the residential proposals.
- 5.5 In relation to the potential of the application to result in a significant adverse impact upon existing centres, the nature and scale of the proposed development is evidence that the amount of trade diverted from existing stores is negligible (especially when accounting for the degree to which stores are currently overtrading). It follows that the proposed development represents no threat to the vitality and viability of Wrexham town centre or any other centre in the adopted retail hierarchy.

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5.6 The proposed development therefore satisfies both the need and impact tests for retail development outlined in the PPW.