

SEQUENTIAL ASSESSMENT

**Asda Stores Ltd,
Holt Road, Wrexham**

**New coffee shop
with drive thru facility
(Use Class A1)**

February 2020



Summary

Proposal:

New coffee shop with drive thru facility (Use Class A1)

Location

Asda Stores Ltd, Holt Road, Wrexham

Date

February 2020

Project Reference

S20.115

Client

EG Group

Product of

Asbri Planning Limited

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Introduction

- 1.1 This Sequential Assessment has been prepared on behalf of EG Group Limited to accompany a planning application proposing the construction of a coffee shop with drive thru facility (Use Class A1) at Asda Stores Ltd, Holt Road, Wrexham.
- 1.2 The proposed development relates to out of centre retail development, as such, Policy S3 (Non-shopping Key Town Centre Uses) requires a sequential test to demonstrate that there are no more central, or sequentially preferable sites that comprise available, suitable and viable alternatives to the application site. Accordingly, a sequential assessment of Wrexham Town Centre has been undertaken.
- 1.3 It is clear that there are no further centres within a reasonable distance of the application site which could be considered alternatives where a sequential assessment request on behalf of the LPA could be justified. Such other centres, a significant distance from the application site, would not be in "competition" to serve the catchment area where there is an identified need (Wrexham) and therefore would not be suitable alternatives for the operator.
- 1.4 In order to provide clarity, the application specifics comprise:
 - 1 no. drive thru unit
 - Drive thru lane
 - 7 no. car parking spaces (Euro Garages and Asda have agreed a shared spaces approach to parking at the site, as such, the application does not include provision for the number of parking spaces usually required for this kind of development)
- 1.5 The overall site area measures 4,000 sqm (0.40 hectares) in extent. This site area reflects the area Euro Garages have agreed to purchase from Asda and includes the access road leading to the public highway. As such, in order to undertake a fair exercise, the site area has been reduced to 0.3 for the purposes of this sequential assessment. This is the typical size of such a development. It is on the basis of this and the specifics of the application that the search for alternate sites has been based (albeit allowing for a significant level of flexibility).

Sequential Analysis

Purpose and Application of the Sequential Test

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

Legal Precedent

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

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

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

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

- 2.8 The Scunthorpe judgement is also helpful in respect of viability. Indeed, para 60 of the decision states:

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

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

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

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

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

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

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

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

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

Drive Thru Appeal Decisions

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

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

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

Planning Policy Wales

- 2.17 National planning policy is contained within the tenth edition of Planning Policy Wales (PPW), published by the Welsh Government in December 2018. It constitutes guidance for Local Planning Authorities (LPAs) and decision-makers and sets out the Government's planning policies for Wales and how these are expected to be applied.
- 2.18 In regard to Sequential Assessments, paragraph 4.3.18 of PPW acknowledges that the Welsh Government operates a 'town centres first' policy in relation to the location of new retail and commercial centre development. However, paragraph 4.3.19 recognises that:

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

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

Location of Application Site

- 2.20 The application site is located approximately 300m northeast of Wrexham Town Centre and is centred on the following grid coordinates: E: 333927, N: 350601. It is currently occupied by a portion of the car parking area for the Asda, in the south west corner of the wider site.
- 2.21 A review of the adopted Unitary Development Plan's proposals map reveals that the site is situated within the settlement boundary, as such, is located in an area where development is normally permitted on 'whiteland'. Therefore, is not subject to any specific allocations or constraints. Notwithstanding, and as aforementioned, the site lies outside of a defined retail centre, therefore Policy S3 (Non-shopping Key Town Centre Uses) which states:

"In order to sustain and enhance its vitality and viability, Wrexham Town Centre will be the preferred location for non-shopping uses, such as offices providing services to the public at large, and for major leisure uses. Proposals for such uses will be permitted firstly within the town centre where they are readily accessible to public transport facilities, followed by edge-of-centre locations, provided that they are of a scale appropriate to the size and function of the town centre and would help to sustain and enhance the vitality and viability of the town centre as a whole. As with retail proposals, only where there is a clearly defined need (defined in accordance with individual proposals) which cannot be accommodated on a site or sites in preferred locations, should outof-centre sites accessible by a choice of means of transport, be considered. A developer must demonstrate that all potential sites in preferred locations have been thoroughly assessed, before proposing less central sites for other key town centre uses."

- 2.22 In accordance with the requirements of Policy S3, an assessment has been undertaken to demonstrate that there are no sites suitable, available and viable and which are in sequentially preferable locations within or on the edge of Wrexham Centre to accommodate the proposed development.
- 2.23 A sequential assessment of Wrexham Town Centre has therefore been undertaken. The centre lies approximately 300m southwest of the site and the other nearest centres to the site are as follows:
- Gwersyllt (3.5km from site)
 - Gresford/Marford (4.8km from site)
 - Johnstown (5.15km from site)
 - Coedpoeth (5.2km from site)
- 2.24 Given the distances of other centres from the site, Wrexham Town Centre is the only town centre to be considered relevant to the proposal.
- 2.25 It is clear that the other centres identified above are not within a reasonable distance of the application site so as to be able to be considered alternatives in respect of the sequential test. Were the proposed development to be relocated to them, the unit would be serving a separate catchment area for which there may not be an identified need for a drive thru unit. Therefore, they would not comprise suitable alternatives for the operator who has a requirement in proximity to Wrexham Town Centre.

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

Sequential Assessment

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

- This sequential test has been undertaken to demonstrate that there are no sequentially preferable sites within the existing centres in accordance with Policy S3 (Non-shopping Key Town Centre Uses) of the adopted Unitary Development Plan.
- The proposal relates to the development of a drive thru unit for which the intended operator has an identified need.
- The drive thru lane element of the proposed development is considered essential to the overall viability of the proposed development. Such a consideration is based on EG Groups market leading international experience in operating such outlets.
- The development is located within an existing car park for an Asda Store. As such, it is highly unlikely to attract customers from the existing centre at Wrexham.
- The application proposes the development of a 1 no. drive thru unit and associated development which will result in the creation of circa 20-30 jobs.
- The site is located approximately 300m away from Wrexham Town Centre. It is therefore considered that it could realistically be described as an edge of centre site.
- It is the intention for the unit to be occupied by a national multiple operator under the EG Group banner. It is therefore not speculative in nature.

Application Specifics

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

- Site area of 0.30ha / 3,000 sqm
- Development scheme comprising:
 - 1 no. Drive Thru unit
 - Drive thru lane
 - 7 no. car parking spaces (Euro Garages and Asda have agreed a shared spaces approach to parking at the site, as such, the application does not include provision for the number of parking spaces usually required for this kind of development)
 - Landscaping

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

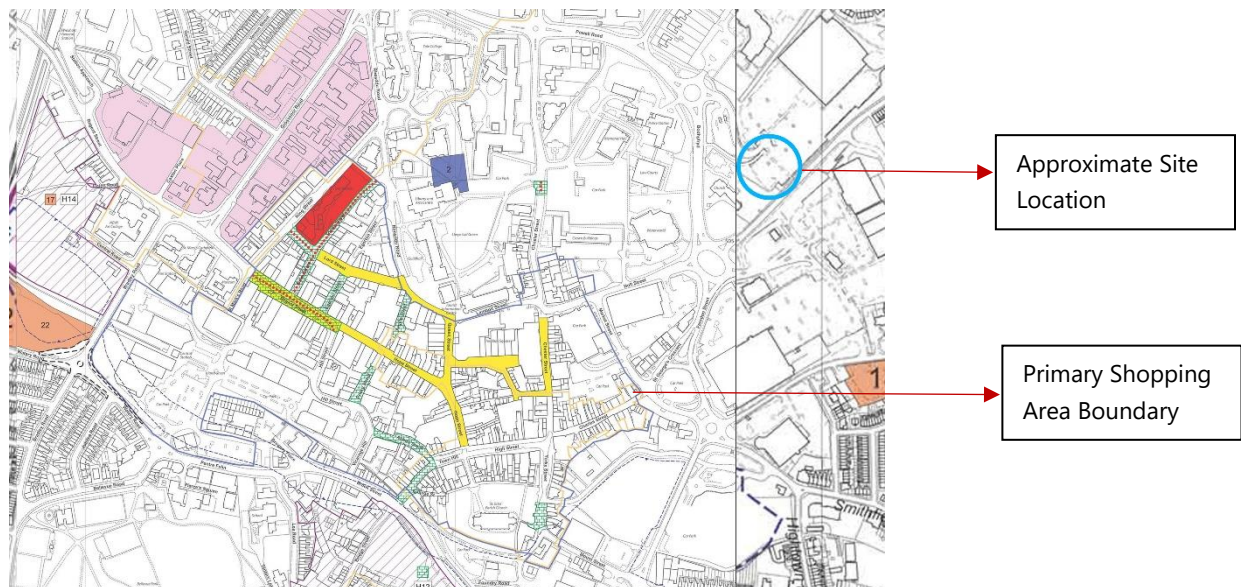
- 2.30 In accordance with the above, and to provide clarity, **our search has been undertaken on sites of 0.225 Ha / 2,250 sqm and above** (i.e. a 25% reduction in scale when compared to the application

site). It is clear that in setting the level of flexibility at 25%, the applicant is willing to show a level in excess of that compared to a traditional approach to the sequential test.

Wrexham Town Centre

- 2.31 Wrexham Town Centre is a large centre concentrated along Regent Street, Hope Street, Lord Street, Queen Street and Chester Street which form the Principal Shopping Streets in accordance with Policy S1 (Shopping Streets in Wrexham Town Centre) of the adopted UDP. The centre features an array of independent opportunities and national operators including; Iceland, Argos and Primark.
- 2.32 The centre lies approximately 300m southwest of the application site and its location in relation to it is shown on the Wrexham Proposals Map extract below:

Wrexham Proposals Map Extract



- 2.33 Given that a large portion of Wrexham Town Centre comprising the Primary Shopping Streets is pedestrianised, it is evident that any existing vacancies/development opportunities within such areas would not be suitable to accommodate a drive thru operation. In regards to the areas that are accessible to vehicles, it is clear from our assessment that the roads would not benefit from the vehicular movements which would make it attractive to a national drive thru operator in our experience. It is therefore considered that they would be neither suitable nor viable for such an operation.
- 2.34 Notwithstanding, we have carried out an assessment of the opportunities as detailed below.
- 2.35 Our survey highlighted that the centre is in good health. It was recorded that there were a low number of vacant units within it on the day of the survey- below the national averages in our experience.
- 2.36 As shown on the Wrexham Town Centre extract below, the Shopping Area extends beyond the Principal Shopping Streets. To that end, our search included those areas beyond the Primary Shopping Streets, within the Shopping Area and included edge of centre sites.

- 2.37 A copy of the survey information of the Shopping Area is provided within **Appendix 1** of the statement. A number of vacancies were recorded which are identified in the table below:

Address	Site Area
<i>Vacancies <500 sqm</i>	
48 Queen Street	48 sqm
Kiosk along Queen Street	52 sqm
25 Lord Street	61 sqm
6 King Street	66 sqm
16 Town Hill	68 sqm
7 High Street	71 sqm
24 Queen Street	96 sqm
53-54 Chester Street	97 sqm
19 High Street	101 sqm
13 Lord Street	102 sqm
5 Queen's Square	108 sqm
5 Egerton Street	110 sqm
27 High Street	110 sqm
13 Lord Street	127 sqm
4 Regent Street	145 sqm
1 Regent Street	147 sqm
39 High Street	157 sqm
5 Henblas Square	202 sqm
6 Regent Street	209 sqm
14 Regent Street	211 sqm
41 High Street	237 sqm
23 High Street	250 sqm
9 Henblas Square	320 sqm
11 Henblas Square	320 sqm
13 Henblas Square	340 sqm
<i>Vacancies 500-1000 sqm</i>	
None	
<i>Vacancies >1000 sqm</i>	
Former Furniture Factory Unit	1,300 sqm

- 2.38 As above, all of the existing vacancies within the centre fall well below the required site area to be considered realistic alternatives to the application site. Notwithstanding, and in the interests of completeness, those vacancies in excess of 1,000 sqm in extent have been assessed in further detail below:

Former Furniture Factory Unit

- 2.39 The property comprises a large 'L' shaped unit adjacent to an Iceland Retail Store within the Island Green Retail Park. It has been formerly occupied by the Furniture Factory and prior to that, TK Maxx. It measures 1,300 sqm in floor space. As such it would not be of sufficient size to accommodate the

proposed development when adopting a 25% in scale to allow for a significant level of flexibility. The site can therefore be discounted from the sequential assessment on the grounds of suitability.

- 2.40 There is also an area of hardstanding accessible to vehicles off High Street, to the rear of the property which is used for deliveries to serve the adjacent Iceland and parking. As such, this area of hardstanding is discounted from the sequential assessment on the grounds of availability as it's loss would be strongly objected to be Iceland.
- 2.41 A review of the sales particulars for the unit reveals that it is being marketed to let and not to sell. It is therefore not available as a development opportunity. Whilst it is a contemporary unit and therefore relatively flexible, it should be emphasised that in order to accommodate the proposed development, the unit would be required to be demolished and redeveloped to provide a drive thru. A 'to let' tenure would not permit this. The site is therefore discounted from the assessment on the grounds of availability.
- 2.42 In the event that the unit could be demolished, the loss of it would be a detriment to the Town Centre. As evidenced by the previous occupiers of the site (TK Maxx and the Furniture Factory) it is apparent that it is most likely to be occupied by a department store for which there are not many existing opportunities within Wrexham Town Centre. As such, its loss would limit the prospects of such an operator occupying it which would detrimentally impact the viability and vitality of the Centre.
- 2.43 In regard to potential access to the unit, aside from the area of hardstanding to the rear, the area to the front and north of the unit is pedestrianised, as such, access for the drive thru could not be established through the Retail Park.
- 2.44 Hill Street runs beyond the footpath to the north of the unit. A large portion of the wide footpath would be required to be compromised in order to serve a drive thru unit and could potentially present a conflict with the bus stop along the northern site of Hill Street and therefore present significant highway safety issues. As such, the former Furniture Factory Unit would not be suitable to accommodate the proposed development.
- 2.45 Further it is considered that Hill Street, is a side street to the Town Centre and would not be subject to the trips required to sustain a viable drive thru unit. In order for a drive thru operation to be viable it's positioning on a site which is subject to high trip generation is vital – such as the Asda car park within which the application site is located.
- 2.46 The Former Furniture Factory Unit has therefore been discounted from the sequential assessment on the grounds of suitability and viability.
- 2.47 In accordance with the above, it is concluded that there are not any vacant sites which can be considered suitable, available and viable in order for them to be considered sequentially preferable to the application site. This sequential test has therefore been satisfied in respect of existing vacancies within Wrexham town centre.

Eagles Meadow Shopping Centre

- 2.48 Eagles Meadow Shopping Centre is a large retail development which features a number of national operators including Debenhams, JD Sports and Next. The shopping centre is situated outside, albeit within close proximity to, Wrexham Town Centre to the south of Smithfield Road. On the day of

surveying, a number of vacancies were identified within Eagles Meadow, however, given that it is pedestrianised, these have been discounted from the sequential assessment on the grounds of suitability given they would not be realistic options to provide a drive thru.

Development Opportunities

2.49 In addition to the above, we have also considered the potential for development sites within and on the edge of the Town Centre. Our research and identification of suitable sites has been based upon the following:

- A working knowledge of development opportunities within surrounding area.
- A review of the UDP Proposals Map and allocations.
- A comprehensive assessment of potential sites during the day of survey.

2.50 The centre is largely bound by residential uses and therefore opportunities for expansion of it or development sites of the scale required are limited. As such, in order to ensure that a robust assessment has been undertaken, the scope of the survey has been extended to areas beyond the Centre which would traditionally not be assessed as they are also in out of centre locations.

Land at Henblas Square

2.51 On the day of surveying, a large area of vacant land was recorded adjacent to Henblas Street. Upon further assessment, the site measures just 760 sqm. It therefore, falls considerably short of the site area required to accommodate the proposed development even when allowing for a 25% reduction in scale.

2.52 Further, Henblas Street is pedestrianised, as such, would evidently not be appropriate for a drive thru operation. The site has therefore been discounted from the sequential assessment on the grounds of suitability.

Former Wrexham Fire Station

2.53 Prior to surveying it was considered that there was a potential development opportunity to accommodate the proposed development at the former Fire Station along Bradley Road. However, upon further inspection, the site was not available and has recently been developed to accommodate a Cat Adoption Centre by virtue of planning permission P/2017/0771. The site has therefore been discounted from the sequential assessment due to availability.

Land at Bridge Street

2.54 On the day of surveying, there was a large vacant portion of land situated outside, albeit within close proximity to the Shopping Area along Bridge Street. The site measures approximately 1,400 sqm in extent, as such, is not of sufficient extent to accommodate the proposed development even when allowing a 25% reduction in site area. As such, the land would not be suitable to accommodate the proposed development.

2.55 The land lies immediately adjacent to a Listed Building at the Burton Buildings, 26-30 Bridge Street (CADW Ref: 1764). It is therefore considered that given the location of the site immediately adjacent to the property, its development to accommodate a drive thru unit could impact the setting of the listed building. As such, the proposed development would constitute a departure from paragraph

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

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

Bridge Street/Cambrian Yard Regeneration

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

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

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

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

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

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

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

- 2.63 Whereas Flood Zone C2 is described as:

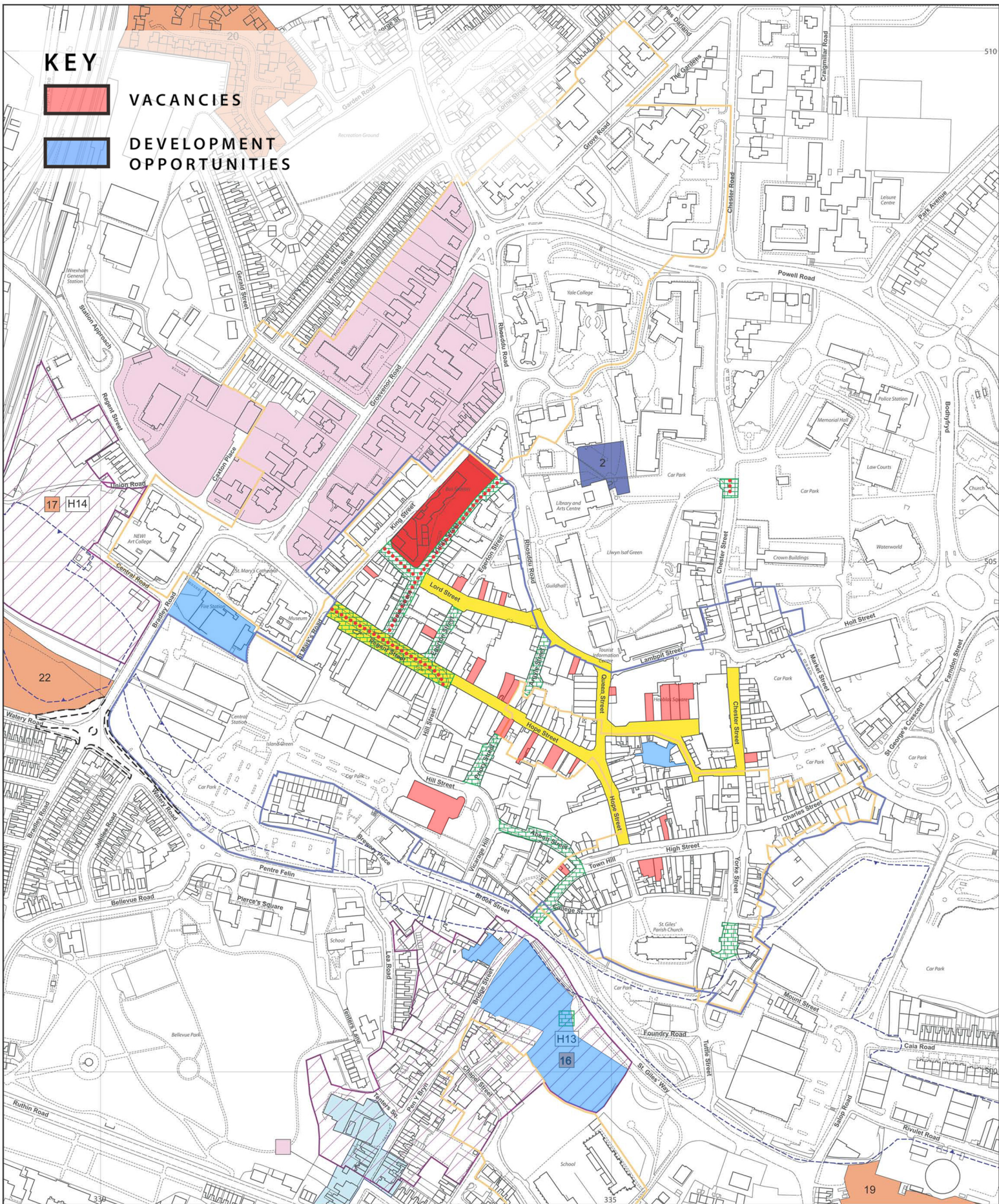
"Areas of the floodplain without significant flood defence infrastructure"

Conclusion

- 3.1 This Sequential Assessment is required to accompany a planning application for the proposed new coffee shop with drive thru facility (use class A1) at Asda Stores Ltd, Holt Road, Wrexham.
- 3.2 Given that the proposal relates to out of centre retail development, Policy S3 (Non-shopping Key Town Centre Uses) requires a sequential test to demonstrate that there are no more central, or sequentially preferable sites that comprise available, suitable and viable alternatives to the application site. Accordingly, an assessment of Wrexham Town Centre has been undertaken.
- 3.3 The proposal relates to the development of a drive thru unit situated within the Asda Store adjacent to Holt Road, which will primarily attract trade from passing motorists and Asda Customers. Given the application site's location 300m from the nearest centre at Wrexham Town Centre, it is considered unlikely that the development would draw trade from designated centres and therefore impact upon their vitality and viability. Notwithstanding, a sequential assessment has been undertaken to satisfy Policy S3 of the adopted Unitary Development Plan.
- 3.4 The assessment is comprehensive and investigated both existing vacancies in or on the edge of the centres identified above. In addition, development opportunities are also assessed.
- 3.5 The statement concludes that there are no sequentially preferable units or sites within the search boundaries and that the sequential test has been satisfied.

APPENDIX 1 – WREXHAM TOWN CENTRE SEQUENTIAL TEST MAP

WREXHAM SEQUENTIAL ASSESSMENT MAP



Inset Plan Notation / Nodiadau Map Mewnosiad

- | | |
|--|---|
| Principal Shopping Street / Prif Stryt Siopa - S1 | Housing / Tai - H1 |
| Shopping Area / Ardal Siopa - S2,S3 | Mixed Use and Regeneration Areas / Ardalau Defnydd Cymysg ac Adfywio - H13, H14 |
| District Shopping Centre / Canolfan Siopa Cylch - S5 | Bus Station Redevelopment / Aildatblygiad Gorsaf Bws - T2 |
| Commercial Offices / Swyddfeydd Masnachol - E7 | Road Improvement / Gwellu Ffyrdd - T4 |
| Conservation Area / Ardal Cadwraeth - EC7, EC8 | Traffic Management / Rheoli Traffig - T7 |
| Environmental Enhancement / Gwelliant Amgylcheddol - EC10 | |
| Development and Flood Risk / Datblygiad a Perygl Llif - EC12 | |
| Community and Leisure Facilities / Cyfleusterau Cymunedol ac Adoliant - CLF2 | |