

PLANNING STATEMENT

**Development of 1 no.
drive thru unit and
associated works**

**Car Park at Asda store,
Holt Road, Wrexham**

February 2020



Summary

Proposal:

Development of 1 no. drive thru unit and associated works

Location:

Asda Store car park, Holt Road, Wrexham

Date:

February 2020

Project Reference:

S20.115

Client:

EG Group

Product of:

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Sequential Assessment

1. Introduction

- 1.1 This Planning Statement has been prepared on behalf of EG Group to accompany a full application for the development of 1 no. drive thru unit and associated works at the Asda Store, Holt Road, Wrexham.
- 1.2 Euro Garages have agreed to purchase the site subject to receipt of a satisfactory planning permission allowing it to be developed for the purposes of a drive thru coffee shop.
- 1.3 The land subject of the application is essentially redundant. It comprises excess and largely unused car parking serving the Asda store.
- 1.4 The use of the land as a drive thru will provide a facility for which there is an identified need by the operator, a positive use for a brownfield site and a series of economic benefits.
- 1.5 The purpose of this Planning Statement is to provide a clear and logical document to assess all material planning considerations associated with the proposed development.
- 1.3 The statement is subdivided into seven sections, including this introduction. Section 2 outlines the site context whilst Section 3 provides a profile of EG Group. Section 4 sets out a description of the proposed development. Section 5 identifies the relevant national and local planning policies which provide the framework for appraising the application. Section 6 relates to sustainable economic development. Following this, Section 7 provides a planning justification before drawing to a conclusion at Section 8.

2. Site Context and Planning Background

- 2.1 The application site is located within the car park of the Asda Superstore which lies off Holt Road, Wrexham. The land currently comprises of hardstanding used for customer parking purposes. The Superstore lies to the east of the proposed drive thru unit whilst Asda's on site PFS lies to the north west.
- 2.2 Vehicular access is achieved via the A5152. Access to the store itself and the PFS is achieved via an unnamed road.
- 2.3 The site benefits from exceptional transportation links and is strategically located in order to access a wide highway network including the A534 (Holt Road), the A5156 / A534 beyond. It is also in close proximity to the Town Centre.
- 2.4 A pedestrian link from the site to Holt Road provides immediate access to the nearest bus stop. From these stops the 5 Gold, 7 and TL1 services run to a variety of locations within Wrexham and beyond.
- 2.5 The site is well-contained to the south east of the existing car park area, as aforementioned, it currently comprises of car parking spaces serving the Asda store.
- 2.6 It lies within Flood Zone A. This means it is considered to be at little or no risk of fluvial or coastal/tidal flooding.
- 2.7 Surrounding uses are largely commercial in nature – typical of the location on the edge of the Town Centre. Holt Road is located to the south with Border Retail Park beyond. A school is located to the north and Capel y Groes to the West.

Planning History

- 2.8 A planning history search for the property and its surroundings has been undertaken via the Council's online planning search system. There are a significant number of applications forming the planning history although the overwhelming majority are minor in scale and operational requirements linked to Asda's requirements. Notwithstanding, the following applications are of note:
 - **P/2008/1029** – Certificate of Lawfulness for Proposed Development by Installation of Mezzanine Floor.
 - **P/2012/0041** – Variation of Condition 4 of Planning Permission Code No. P/2011/0803 Re. Hours of Operation on Sunday And Bank Holiday From 10.00 - 16.00 To 07.00 - 22.
 - **P/2013/0695** - Hand Car Wash Including Cabin and Canopy

- 2.9 In accordance with the above it is not considered that there is any planning history which could be considered negative in the context of the application to which this statement relates. Therefore, it should be assessed in accordance with prevailing planning policy at a local and national level.

3. EG Group

- 3.1 Based in Blackburn, EG Group was founded in 2001 by brothers Mohsin and Zuber Issa with the acquisition of a single petrol filling station in Bury, Greater Manchester. In October 2017 the company rebranded its Europe Wide operations to the EG Group since establishing itself as one of Europe's fastest growing and most recognisable forecourt operators, with an expanding portfolio of 341 freehold-owned petrol stations located throughout mainland UK and a large number of separate roadside welfare facilities (roadside restaurants and motorway service areas). The company operates approximately 2,500 sites across Europe (including the UK) and employs approximately 12,500 people.
- 3.2 Alongside an innovative approach to roadside retail property, EG Group has forged high-profile relationships with nationally and globally recognised retail and convenience brands, now operating in excess of 75 Starbucks drive-to and drive-thru restaurants, 50 Burger Kings, 153 Subway sub-stations and 104 Greggs bakeries. EG Group is the largest franchisee for Subway in Europe.
- 3.3 The company's vision is to collaboratively engage and work with leading retail brand partners to be able to deliver a world class fuel, convenience, food and drink offer that exceeds the expectations of the modern consumer.
- 3.4 The company promotes the following values and business ethos:
- Market awareness with active responsiveness to convenience consumer trends and demands.
 - Delivering value and results consistently to shareholders, stakeholders and partners.
 - Commitment to on-going infrastructure and people investment to build a sustainable business model.
 - Supporting local communities with a view to empowering individuals to grow, contribute and succeed.
- 3.5 EG Group make sustainability a key consideration. To that end, in 2014 they invested £2.6m in providing solar panels for over 20% of the EG sites. In May 2017, it was announced that they would be providing an additional £6m into reducing their carbon footprint. Additionally, six motorway service stations feature rain water harvesting systems, collecting rain water which is then filtered to be used on site. All new to industry buildings include solar panels to generate a minimum of 10% energy.

Proposed Development

- 4.1 The application seeks full planning permission for the development of 1 no. drive thru unit and associated works.
- 4.2 The proposed drive thru unit is to be located to the south west of the existing Asda superstore site and is proposed to replace existing car parking spaces serving the store. An Asda petrol station lies to the north east of the proposed drive thru unit.
- 4.3 The drive thru unit will measure (GEA) 215m².
- 4.4 As aforementioned, the site currently comprises of parking bays utilised by customers of the Asda Superstore. Proposals for the drive thru include for 7 parking spaces. This constitutes a reduction of 62 spaces from the current configuration. It is not considered that this will prove to be impactful on the current users of the car park as they are the spaces located furthest away from the superstore, therefore, unlikely to be popular spots for customers. Euro Garages and Asda have agreed a shared spaces approach to parking at the site to ensure both the superstore and the coffee unit are adequately catered for.
- 4.5 It is now a fundamental part of design standards to ensure that new developments are as accessible as possible by several modes of transport. In this regard and as identified in Chapter 2, the site lies within close proximity to Wrexham Town Centre and Holt Road, along which several bus stops are located.
- 4.7 The accompanying layout shows proposed areas of landscaping to the south, east and west of the drive thru unit. These areas of soft landscaping will ensure that the site has high levels of visual amenity, with the southern pocket serving as a continuation of existing greenery to the south of the site.
- 4.8 In regard to appearance of the proposed drive thru unit, it will be engineered to one storey and comprise a modern design which will comprise a positive enhancement to the site and surrounding area.
- 4.9 It is proposed that the unit will operate 24 hours a day.
- 4.10 Finally, the proposed development will result in economic benefits in the form of significant job creation in the form of 20-30 FTE positions.

Planning Policy Context

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

Planning Policy Wales

- 5.2 PPW Edition 10 was published in December 2018. It states that the Welsh Government remains one of the few administrations in the world to have a distinctive statutory duty in relation to sustainable development. The Well-being of Future Generations (Wales) Act 2015 places a duty on public bodies that they must carry out sustainable development. The Well-being Goals include:

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

- 5.3 The planning system is central to achieving sustainable development in Wales. It provides the legislative and policy framework to manage the use and development of land in the public interest which is consistent with key sustainability principles.

- 5.4 Paragraph 3.3 states *"Good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places. To achieve sustainable development, design must go beyond aesthetics and include the social, economic, environmental, cultural aspects of the development, including how space is used, how buildings and the public realm support this use, as well as its construction, operation, management, and its relationship with the surroundings area."*

- 5.5 PPW emphasises that the planning system should support economic growth within the context of sustainable development and that economic development should facilitate regeneration and promote social and environmental sustainability.

- 5.6 Paragraph 4.1.34 states *"New development must provide appropriate levels of secure, integrated, convenient and accessible cycle parking and changing facilities. As well as providing cycle parking near destinations,*

consideration must also be given to where people will leave their bike at home. Guidance on cycle parking is contained within the Active Travel Design Guidance. Planning authorities may alternatively wish to adopt locally specific minimum cycle parking standards and guidance."

- 5.7 Para 5.4.2 states *"Economic land uses include the traditional employment land uses (offices, research and development, industry and warehousing), as well as uses such as retail, tourism, and public services. The construction, energy, minerals, waste and telecommunications sectors are also essential to the economy and are sensitive to planning policy. This section focuses primarily on traditional employment land uses (B1, B2 and B8) while policies on other economic sectors are found elsewhere in PPW."*
- 5.8 Para 5.4.4 States *"Wherever possible, planning authorities should encourage and support developments which generate economic prosperity and regeneration. Sites identified for employment use in a development plan should be protected from inappropriate development."*

Technical Advice Notes

TAN 12-Design

- 5.9 This Technical Advice Note was revised in July 2014 in order to update new requirements, including those for Design and Access Statements. The purpose of TAN 12 is to provide advice on design considerations and the role of the planning system in supporting sustainable and innovative design solutions. In relation to housing design, it states (Para 5.11.2) that local planning policy and guidance should aim to:
- create places with the needs of people in mind, which are distinctive and respect local character;
 - promote layouts and design features which encourage community safety and accessibility;
 - focus on the quality of the places and living environments for pedestrians rather than the movement and parking of vehicles;
 - avoid inflexible planning standards and encourage layouts which manage vehicle speeds through the geometry of the road and building;
 - promote environmental sustainability features, such as energy efficiency, in new housing and make clear specific commitments to carbon reductions and/or sustainable building standards;
 - secures the most efficient use of land including appropriate densities; and

- consider and balance potential conflicts between these criteria.
- 5.10 This TAN also provides a definition of “character” which is contained within the guidance on designing in context (Para 5.8):-
- “..... Appraising “character” involves attention to topography; historic street patterns, archaeological features, waterways, hierarchy of development and spaces, prevalent materials in buildings or floorscape, architecture and historic quality, landscape character, field patterns and land use patterns, distinctive views (in and out of the site), skylines and vistas, prevailing users and plan forms, boundary treatments, local biodiversity, natural and cultural resources and local distinctive features and traditions (also known as vernacular elements).”*
- 5.11 The TAN goes on to state that opportunities for innovative design will depend on the existing context of development and the degree to which the historic, architectural, social or environmental characteristics of an area may demand or inhibit a particular design solution.
- TAN 18-Transport**
- 5.12 TAN 18 identifies that influencing the location, scale, density and mix of land uses and new development can help reduce the need to travel and length of journeys, whilst making it easier for people to walk, cycle or use public transport (Para 2.4).
- 5.13 With respect to housing development, TAN 18 states (Para 3.4) that settlement policies and residential allocations in development plans should:
- promote housing development at locations with good access by walking and cycling to primary and secondary schools and public transport stops, and by all modes to employment, further and higher education, services, shopping and leisure, or where such access will be provided as part of the scheme or is a firm proposal in the RTP;
 - ensure that significant new housing schemes contain ancillary uses including local shops, and services and, where appropriate, local employment;
 - include policies and standards on density, and parking to achieve higher residential densities in places with good public transport accessibility and capacity;
 - encourage residential layouts that incorporate traffic management proposals such as home zones, calming measures and 20 mph zones and where appropriate, layouts that allow public transport to pass through easily; and

- require layouts and densities, which maximise the opportunity for residents to walk and cycle to local facilities and public transport stops.”

TAN 23-Economic Development

5.14 This Technical Advice Note provides guidance on economic development and planning. According to Welsh Government, the guidance covers

- *Planning economic development at a strategic level*
- *Working with neighbouring authorities and relevant stakeholders*
- *Identifying and assessing economic benefits of development proposals*
- *Establishing an evidence base to help prepare economic development policies for LDPs.*

Wrexham Unitary Development Plan

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

5.16 As shown on the proposals map extract below, the site lies on the edge of, albeit outside of the settlement boundary:



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

- **Policy PS1** - New development for housing, employment, and community services will be directed to within defined settlement limits/employment areas.

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

- **Policy GDP1** - All new development should:-

- a) Ensure that built development in its scale, design and layout, and in its use of materials and landscaping, accords with the character of the site and makes a positive contribution to the appearance of the nearby locality.*
- b) Take account of personal and community safety and security in the design and layout of development and public / private spaces.*
- c) Make the best use of design techniques, siting and orientation in order to conserve energy and water resources.*
- d) Ensure safe and convenient pedestrian and vehicular access to and from development sites, both on site and in the nearby locality.*
- e) Ensure that built development is located where it has convenient access to public transport facilities, and is well related to pedestrian and cycle routes wherever possible.*
- f) Ensure the safety and amenity of the public and safeguard the environment from the adverse effects of pollution of water, land or air, hazards from industry and quarrying, and associated noise, odour or vibration arising from development.*
- g) Secure public services (e.g. gas, water, electricity) to development at minimum public cost.*
- h) Safeguard sites and areas of nature conservation and wildlife interest, and to provide new habitats where there is an unavoidable loss of existing habitats and areas of wildlife interest.*
- i) Ensure that development does not result in, or is subject to, flooding, soil erosion, landslides or contamination, either on or off the site.*
- j) Have regard to the need to safeguard those areas that possess a strong Welsh cultural and/or linguistic identity from development that could harm this identity.*
- k) Secure the development of sustainable communities, through the promotion of the economic, social and environmental well-being of the area.*

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

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

Wrexham Local Development Plan

- 5.18 The Wrexham Local Development Plan was submitted to the Planning Inspectorate in summer 2019 and following minor changes is expected to be adopted in the near future. It is considered that given its advancement, its policies in relation to this application should be discussed.
- 5.19 As identified on the Deposit Proposal Map below; the site lies outside, albeit within close proximity to Wrexham Town Centre. It is not allocated for any specific purpose. The following draft policies are considered of note:

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

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

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

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

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

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

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

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

- 5.23 In light of the above, it is considered that a Sequential Assessment is required to demonstrate that the proposal would not impact upon the vitality of designated shopping centres. The supporting text of Policy R6 confirms that the Assessment would be required in relation to this application as the scale of the development exceeds 100m². Please see Appendix 1 of this Report for the required assessment.

6 Sustainable Economic Development

- 6.1 Sustainable development is identified in PPW as a golden thread running through the planning system.
- 6.2 The application site comprises land within the Asda store car park, Holt Road, Wrexham. It is underutilised car parking.
- 6.3 The site is brownfield in nature and within the settlement boundary. This application proposes the development of it in order to provide a coffee drive thru to be operated by EG Group.
- 6.4 The site is free from any planning history which could be considered detrimental in the context of the application to which this statement relates.
- 6.5 The proposed development is therefore considered a positive use of underutilised land which will result in a series of benefits for users of it in addition economic benefits by way of job creation.
- 6.6 The site is located in a highly sustainable and accessible location. This is evidenced and expanded upon in the Transport Note which forms part of the application package.
- 6.7 As shown on the proposed elevational drawings, the design/appearance of the unit will be modern. The proposed development is proportionate within its surroundings and the site more generally.
- 6.8 It is considered important for the image of the site in general that it is in occupation and providing the employment generation which it has the potential to provide – thus avoiding its continued underuse as largely redundant car parking space.
- 6.9 The proposed unit will allow for the employment of circa 20-30 people. The economic benefits arising from the proposed development could therefore be considered to be significant and form a material consideration in the determination of the application to which this statement relates.
- 6.10 It is likely that all staff will be locally based and benefit from a training and employment programme. Therefore, should the application be approved, the development will make a positive contribution towards local employment provision.
- 6.11 It is therefore concluded that the proposed development comprises sustainable economic development which will continue to enable sustainable economic growth in an appropriate location.

7 Appraisal

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

- The site is strategically located in order with immediate access a wide highway network including the A534 (Holt Road), the A5156 / A534 beyond. It is also in close proximity to the Town Centre.
- The development of the 1no. drive thru unit will complement the immediate land uses i.e. Asda Superstore and nearby PFS;
- As discussed, in further detail below, there are no coffee drive thru uses within close proximity to the site;
- The application site is currently in use as redundant parking spaces;
- The application is tailored to the specific requirements of Euro Garages who are experienced operators of such outlets. It is not speculative;
- The proposed development will result in significant economic benefits in the form of 20-30 full time positions;
- The Transport Note evidences the overprovision of car parking swerving the Asda store and that the proposed development will have no impact on that operation.
- The Local Development Plan does not identify sites for roadside drive thru facilities. Such uses can only operate in specific locations.

7.2 The application proposes the construction of 1 no. drive thru unit. Evidence of Compliance with relevant policy and a local and national level is provided below.

Compliance with Policy S3

7.3 In assessing the acceptability of the proposal against the land management policies for the area contained within the Wrexham County Borough UDP and emerging Local Development Plan, the most pertinent policy to consider is Policy S3 which states that only where there is an identified need will retail uses outside of defined shopping centres be permitted. As aforementioned, there are no drive thru coffee shop operations within close proximity to the site.

7.4 Moreover, Policy S3 states that retail developments outside of a defined centre should be readily accessible by a variety of means of transport. In this regard, the site is strategically located in very close proximity to the Town Centre which is accessible via a range of private and public transportation methods. In order for Drive Thru Units to be successful, it is essential that they are positioned along highway networks which are subject to high trip rates. It is therefore considered that the site's location within close proximity to the Town Centre and the heavily trafficked Holt Road within the existing Asda car park (albeit within surplus space) accords with the criteria.

- 7.5 The application is accompanied by a Transport Note prepared by Dynamic Transport Planning. The report discusses the accessibility of the site via a range of sustainable travel options including walking and cycling. As aforementioned, the proposed development is to be provided with adequate cycle provision and benefits from exceptional transportation links.
- 7.6 The report identifies the proximity of the site both to the Town Centre boundary but also to bus stops located on Holt Road which the site benefits from a direct link to. The bus stops are in close proximity to the pedestrian linkages provided at the southern boundary of the site.
- 7.7 Policy S3 also stipulates that in order for out of centre retail developments to be considered acceptable, evidence should be provided to demonstrate that no preferable sites exist within the defined boundary of a retail centre. A sequential assessment of potential development sites within the Town Centre is provided within Appendix 1 of this statement.
- 7.8 In light of the above, it is considered that the above has sufficiently demonstrated that the development as proposed, will not detract from the vitality and viability of Wrexham Town. As such, is compliant with the most pertinent policy (S3) contained within the Wrexham County Borough Council Unitary Development Plan.

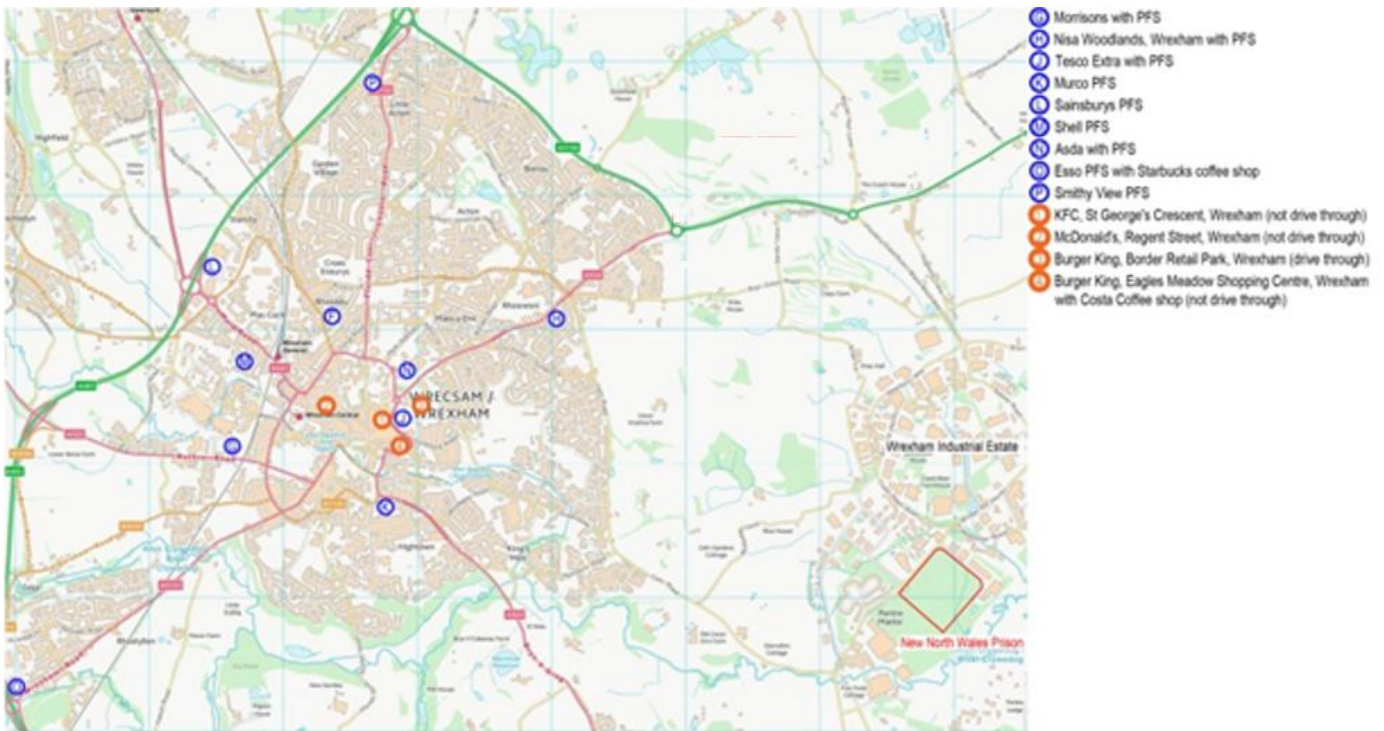
Compliance with Policy R6 of the LDP

- 7.9 It is acknowledged that the Local Development Plan is yet to be adopted and therefore holds no weight in the determination of current applications. However, given its expected imminent adoption it is considered pertinent to discuss the most relevant policy contained within the Plan – Policy R6: Retail Development (Edge and Out of Centre).

Criterion i – Need for Development

- 7.10 Policy R6 states that retail uses appropriate to a town centre will not be permitted outside of a centre unless there is a need for the development which could not be reasonably accommodated within

the centre. There are no drive thru coffee units within close proximity to the site as shown on the plan below:



- 7.11 The plan clearly evidences a lack of drive thru coffee units – both in close proximity to Wrexham Town Centre and indeed more generally.
- 7.12 The offer at Drive thru units is significantly different from that of drive to units. Indeed, the Transport Note submitted in support of the application identifies that circa 80% of the users of the proposed unit will be vehicles already on the road network. To that end, the differences in operation between the unit proposed by way of this application and drive to units, typically found within Town Centres is clear.
- 7.13 EG Group, one of the largest operators of PFS and drive thru units within Europe, has identified a significant need for such a development in proximity to Wrexham Town Centre. While specific brands are not discussed in EG applications, it is anticipated that the unit will be occupied by an international coffee retailer. The application can therefore not be considered to be speculative which provides further evidence of need for the proposal.
- 7.14 In respect of the sequential test, such an assessment is provided in Appendix 1 of this Statement. It is clear that there are no sites within the relevant centre (Wrexham Town Centre) which can be considered suitable, available or viable alternatives to the application site.

- 7.15 It is therefore considered that there exists an identified need for the proposed Drive Thru in accordance with Criterion i of Policy R6.

Criterion ii – Need cannot be satisfied within existing retail centres

- 7.16 Please refer to the Sequential Assessment contained within Appendix 1 which assesses the development potential of sites within existing retail centres to accommodate the proposed development.

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

- 7.17 Tan 4 requires impact assessments to be undertaken in support of retail proposals of over 2,500 sqm and above. The unit subject of this application is just 8.6% of that figure. It is therefore de minimis in scale and highly unlikely to result in any negative impact to nearby centres.
- 7.18 Given the specifics of the use proposed (i.e. a drive thru coffee shop), it is clear that the proposed unit will primarily draw trade from passing motorists. It is unlikely in the extreme that individuals will alter their shopping patterns to show preference for the unit as opposed to existing options within the Town Centre which are more reliant on pass-by trade from pedestrians. The below appeal decisions form an essential element of evidencing the above.

Appeal Case -APP/00830/A/05/1182303

- 7.19 The above Appeal case 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."

Appeal Case –APP/Q1255/A/08/2061585

- 7.20 For the avoidance of duplication, 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.

- 7.21 Euro Garages operates in excess of 40 drive thrus around the UK and in excess of 300 food outlets. None of the drive thrus are located within town centres and the food outlets (without drive thrus) which are within town centres are linked to existing filling stations. It has been held by the Planning Inspectorate that drive thrus can act as part of a roadside facility (APP/C3105/W/16/3151655) for the following reason:

"Given that the purpose of this development is to provide roadside facilities for motorists on the A43, which by definition is unlikely to be within a town centre, I consider the sequential test to be of little relevance to this appeal and this was confirmed by the Council at the hearing. Furthermore, the Council's statement notes that disputing whether or not there are alternative sites available will not be beneficial to either party. The Council also confirmed at the hearing that the question of alternative sites does not arise in this case, as there are none under consideration."

- 7.22 Whilst the above related to the sequential element, it is clear that there is a difference between a typical town centre operation as and a roadside operation such as a drive thru. As an example of how a typical coffee outlet operates, EG have reviewed one of their newest openings in Leeds. Between 11th September and 2nd October 2017 an average of 82% of customers bought their product 'to go'. For the flagship site in Blackburn as a second comparison, 55% of customers used the drive thru and a total (including drive thru) of customer 'to go' orders was 77%.

- 7.23 Consequently, it is considered clear the vitality and viability of the Town Centre will not be compromised as a result of the proposed development given its fundamentally separate characteristics to those provided within the Town Centre and evidenced type of users.

- 7.24 As such, the scheme complies with criterion iii of Policy R6.

Criterion iv – Accessibility

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

Criterion v – development over 100m²

- 7.26 As identified in the Planning Policy chapter, the supporting text of Policy R6 stipulates that when out of centre retail development exceeds 100m² a sequential test should be undertaken to evidence

that there are no preferable sites located within defined centres. The results of the sequential test undertaken in relation to the proposed development are articulated in Appendix 1 of this statement. The development is therefore in accordance with Criterion v of Policy R6 of the Deposit LDP.

Other Material Planning Considerations

- 7.27 A summary of other material considerations is provided below:

Economic Considerations

- 7.28 A summary of economic considerations is provided in Section 6 of this Statement. Notwithstanding, it is reiterated that the use will result in the creation of 20-30 jobs.

- 7.29 The importance of sustainable economic development is a golden thread running through planning policy at a national level. Given this, the Council should be minded to adopt a positive approach in the determination of the planning application.

Design

- 7.30 The design of the proposed development is shown on the drawings which form part of the application package. The drawings show a modern design which will comprise an aesthetically pleasing development.
- 7.31 Given the prominence of the site and its proximity to Holt Road, it is therefore considered that the proposed unit will positively contribute to the site and will comprise a strong design statement.

Highways

- 7.32 Dynamic Transport Planning have prepared a note which forms part of the application. The report highlights:

The proposed development will provide a new drive-thru coffee shop resulting in the loss of 62 car parking spaces within the existing store car park, though this is the section of parking most remote from the foodstore.

A review of the existing highway accident data within the vicinity of the site has been undertaken and shows that there are no pre-existing patterns or trends of incidents that could be impacted by the development proposals.

The accessibility of the site by non-car modes of travel has been reviewed and the site is shown to have excellent access by a number of sustainable modes of travel.

The traffic generating potential of the development has been considered and is not expected to lead to any significant increase in vehicle movements to the site with the majority of trips to be linked with vehicles already accessing the wider site.

The parking provision of the wider retail site has been reviewed and it is shown that significant spare capacity will be retained once the development is in place which would cater for any seasonal peaks of demand above the typical levels.

Overall, the proposals will represent an additional facility to users of the wider retail site and on the basis of the above assessment it is considered that there are no outstanding reasons why the development should not be granted planning permission.

FCA & Drainage

- 7.33 A SAB and Drainage Strategy has been prepared and forms part of the application package. The report confirms the acceptability of the proposal and its accordance with prevailing local and national planning policy.

Conclusion

- 7.34 It has been comprehensively evidenced that the proposal will result in significant economic benefits in the form of job creation. Further to this, there is a clear need for the proposed development and the impact of the proposal will be minimal. The Drive Thru operation will compliment existing facilities in and on the edge of Wrexham Town Centre. A sequential test has been provided which demonstrates that there are no preferable sites which are suitable, viable or available in the relevant centres.

8 Conclusion

- 8.1 This Planning Statement has been prepared on behalf of EG Group in respect of their application proposing the development of a drive thru unit within the Asda Car Park, Holt Road, Wrexham.
- 8.2 The Drive Thru will comprise a complimentary use to the Asda store and provide a facility for which there is a requirement within Wrexham.
- 8.3 It has been evidenced within this statement that there is a clear need for the proposed development and the impact will be minimal. A sequential assessment has been undertaken to demonstrate that there are no preferable sites which are suitable, viable or available in the relevant centres.
- 8.4 The store benefits from an excess in car parking space, the development of an element of the car park as proposed will have no impact on the day to day operation of the supermarket. Euro Garages and Asda have agreed a shared spaces strategy in order to ensure that both the superstore and the coffee unit benefit from ample parking provision.
- 8.5 The proposal will result in significant economic benefits in the form of 20-30 FTE positions. This comprises a material consideration in the determination of the application.
- 8.6 This Statement has demonstrated that the development, as proposed, is compliant with relevant policies contained within the adopted Unitary Development Plan. Furthermore, pertinent policies contained within the yet to be adopted Local Development Plan have also been addressed and are considered to be in accordance with the proposed development.
- 8.7 In conclusion, the proposed development will result in a series of benefits including significant economic benefits. It is therefore respectfully requested that Wrexham County Borough Council grant planning approval for the proposed development of 1 drive thru unit within the Asda car park, Holt Road, Wrexham.