

OPTIMISATION DEVELOPMENTS LIMITED

PROPOSED SUPERSTORE

LAND AT RUTHIN ROAD, WREXHAM

RETAIL ASSESSMENT

DECEMBER 2009

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**1. INTRODUCTION, BACKGROUND TO THE PROPOSALS AND REPORT
STRUCTURE**

Introduction

- 1.01 Peacock & Smith Ltd has been instructed to prepare a Planning Statement in connection with proposals by Optimisation Developments Limited ('ODL') for a superstore development on land to the north of the A525 Ruthin Road, Wrexham. The superstore will be operated by Wm. Morrison Supermarkets plc ('Morrisons').
- 1.02 The proposals are the subject of a full Planning Application submitted to Wrexham County Borough Council ('WCBC') by Agents Archial Architects Ltd.
- 1.03 The application is also supported by this Retail Assessment, together with:
- (a) a Planning Statement (also prepared by Peacock & Smith Ltd);
 - (b) a Transport Assessment (prepared by TTHC – Transport, Traffic and Highway Consultancy);
 - (c) a Site Investigation Report (prepared by Sirius Geotechnical and Environmental Ltd);
 - (d) a Flood Risk Assessment (prepared by BCSP – Consulting Civil Structural Engineers);
 - (e) a Habitat Survey and Protected Species Assessment (prepared by Smeeden Foreman Ltd – Landscape Architects, Urban Designers, Ecologists and Horticulturalists);
 - (f) an Acoustic Assessment (prepared by Belair Research Ltd – Acoustic Consultants);
 - (g) a Planning Application Design Statement (prepared by Archial Architects Ltd).
- 1.04 The application site extends to some 3.8 ha. The proposals are based around a single 'built-use' concept providing a food superstore of 6,748 sq.m. gross floorspace

with associated petrol filling station (PFS) and customer vehicle parking. Further details are provided at Section 2 of this report.

Background to the Proposals

- 1.05 In May 2007 WCBC published a Brief for Future Development of land at Ruthin Road, Wrexham, and invited tenders for the development of the site in accordance with the terms of the Brief. The site, measuring 4.70ha, is located on the north side of the A525 Ruthin Road and is bounded to the east by the Chester to Shrewsbury Railway Line, the Maelor General Hospital and adjoining commercial properties to the north and a proposed fire and ambulance station development to the west (the 'Brief Site'). The attached Planning Statement provides further details on the Brief and its requirements.
- 1.06 This report considers the retail planning policy issues raised by developing the new store.

Report Structure

- 1.07 This report is written in Sections as set out below, and should be read together with the other supporting application reports:
- (a) **Section 2:** sets out a description of the site and of the proposed development;
 - (b) **Section 3:** summarises the key elements of the retail planning policy context against which the current proposals should be assessed;
 - (c) **Section 4:** considers the retail planning issues raised by the proposed development;
 - (d) **Section 5:** sets out a summary and overall conclusions
- 1.08 Throughout this report, reference is made to a number of **Appendices**. These are bound integrally with it.

2. DESCRIPTION OF THE SITE AND THE PROPOSED DEVELOPMENT

Site Location and Description

- 2.01 The site (hereafter referred to as the 'application site') lies on the northern side of the A525 Ruthin Road approximately 700m to the west of the western edge of Wrexham Town Centre as defined on the adopted Wrexham Unitary Development Plan (1996-2001) Town Centre Inset Proposals Map.
- 2.02 The area, which is the subject of the Development Brief, extends to 4.70ha, but the application site excludes an area of this land to the east and north and includes a section of the highway on Ruthin Road in order to accommodate the proposed access works. Accordingly, the application site measures 3.8 ha.
- 2.03 The application site is irregularly shaped with boundaries to the north/north east, east, south and west which divide the site from the surrounding uses as follows:
- (a) to the north/north west: principally the Wrexham Maelor General Hospital and adjoining commercial properties lying to the south of Croenewydd Road, although there are a number of residential units located along Dolydd Road which runs southwards from Croesnewydd Road dividing the hospital and commercial units;
 - (b) to the east: the Chester to Shrewsbury railway line beyond which there is an extensive residential area lying to the west of the A5152 Bradley Road, extending westwards up to the railway line, off Llys David Lord;
 - (c) to the south: Ruthin Road itself, beyond which there is a further residential area (Bryn Offa) off Centenary Road, and a social club;
 - (d) to the west: Council offices and an ambulance depot beyond which there is further commercial development.
- 2.04 Ruthin Road is a major route into Wrexham Town Centre from the A483 to the west. In the vicinity of the site, Ruthin Road is a wide single carriageway road with a ghost island central reservation. It has the benefit of street lighting and has footways on

both sides. Ruthin Road is also a bus route and there are bus stops in the vicinity of the existing site access, which is via a staggered ghost island priority junction.

- 2.05 As is noted in the Development Brief, the application site contains two distinct zones reflecting former and existing uses, the former railway land and the highways depot. From this it is clear that the site comprises Previously Developed Land (PDL).

Description of the Proposed Development

- 2.06 The proposed development comprises two main components:
- (a) the proposed means of access (including a footway and cycle way to the north); and
 - (b) the superstore, associated PFS and customer car parking.

Means of Access

- 2.07 The proposed means of access consists of a signal controlled T junction with Ruthin Road. This would provide a shared access arrangement with the possible future fire/ambulance station development, the proposed amenity area and potentially to the hospital to the north. The benefit of a signal controlled arrangement with Ruthin Road is that it could be fitted with "Hurry-Call" or "All-red" facilities to enable emerging vehicles to receive priority when leaving the site, with traffic on Ruthin Road being held via the safety of a red signal aspect.
- 2.08 The proposals incorporate fully controlled pedestrian/cycle crossing facilities, which connect directly with the proposed footpath/cycle track linking through the site.
- 2.09 Further details of the proposed means of access and the accessibility of the site by a choice of means of transport are set out in the Transport Assessment, the findings of which are summarised at Section 5 of the Planning Statement and Section 4 of this report.

Superstore, PFS and Car Park

- 2.10 The proposed superstore will be operated by Morrisons, which is not presently represented in Wrexham. Morrisons was founded in 1899 and in the 1960s was at the forefront of supermarket development. Morrisons became a public company in 1967 and in 2001 joined the FTSE. In March 2004 the Company completed the takeover of Safeway Stores plc ('Safeway') and is now the fourth largest supermarket chain in the UK, employing over 117,000 people with an annual turnover of £13 billion (financial year ending January 2008). Following the takeover of Safeway and the disposal of a number of former Safeway stores, Morrisons operates 420 stores throughout the UK.
- 2.11 The key aspects of Morrisons trading profile are:
- (a) Morrisons retail policy includes a high quality shopping environment in well designed buildings constructed and equipped to a high specification, a highly competitive price structure in every store, more than 20,000 different products displayed in-store, a strong emphasis on the sale of groceries and fresh foods, wide aisle and circulation areas, full facilities for disabled shoppers, a high level of personal service from staffed counters, simplified payment at checkout, and recruitment of staff locally and the provision of a comprehensive programme of training and career enhancement;
 - (b) the corollary to the emphasis on the sale of groceries is that Morrisons has a significantly smaller comparison goods range than a number of the Company's competitors such as Tesco and Asda. The nature of comparison goods sales is limited principally to the smaller-scale comparison goods frequently purchased in conjunction with convenience shopping trips. This has two main advantages: first, it allows the Company's stores to concentrate on the sale of fresh food and groceries; and second, Morrisons stores tend to compete less directly with the conventional ranges of comparison goods traditionally sold from town centres than the Company's competitors. In this respect Morrisons stores complement rather than compete with comparison shopping provision in town centres.
- 2.12 A detailed description of the proposed superstore, PFS and car park is provided within the submitted Planning Statement. In brief, the proposed superstore building is

- located in the north western quadrant. The PFS is located to the south of the store building on part of, but screened by proposed landscaping from, the Ruthin Road site frontage.
- 2.13 The store is orientated with its principal elevation facing Ruthin Road with its main entrance at the south eastern corner of the building facing the car park. The site will be accessed from Ruthin Road, however the proposals include a new footway/cycleway linking land to the west (including the recently completed hospital parking area) with that to the north, west and south.
- 2.14 The proposed superstore will have a gross floorspace of 6,748 sq.m. and a net floorspace of 3,340 sq.m. of which 2,505 sq.m. (75%) will be given over to the sale of convenience goods and 835 sq.m. (25%) to the sale of comparison goods. The store will accommodate the popular Morrisons trademark 'Market Street' concept and will provide in addition a full range of customer facilities including customer café with 160 seats, customer toilets and baby change facilities, a first aid post, ATMs, kiosk, dry cleaners and pharmacy.
- 2.15 The proposed superstore will provide employment for 300 jobs (220 full-time and 80 part-time).
- 2.16 The customer car park lies to the east/south east of the superstore building. A total of 510 customer car parking spaces are proposed, together with 10 trolley bays. Customer car parking will include 31 wider bays for disabled shoppers and 12 wider bays for parents and toddlers – all located in close proximity to the store entrance.

3. RETAIL PLANNING POLICY CONTEXT

- 3.01 Planning Policy Wales (PPW) 2002 notes that applications for planning permission, or for the renewal of planning permission, should be determined in accordance with the approved or adopted Unitary Development Plan ('UDP') unless material considerations indicate otherwise. Such material considerations could include current circumstances, policies in an emerging UDP, and planning policies of the Assembly Government and the UK Government. All applications should be considered in relation to up to date policies. The submitted Planning Statement includes a comprehensive review of the relevant planning policy and this report only provides an assessment of the relevant retail planning policies in relation to the proposed development.
- 3.02 In this case the adopted UDP comprises the Wrexham Unitary Development Plan 1996-2011 (February 2005).
- 3.03 WCBC is in the course of preparing its Local Development Plan ('LDP') which will guide the development and use of land in the County Borough up to 2021, and when adopted will replace the UDP. The LDP Draft Preferred Strategy was published for consultation in October 2007, but the LDP is not expected to be adopted until November 2010. The Preferred Strategy contains a number of Strategic Policies which are material considerations, but at present since the LDP is unadopted it does not carry the weight for development control purposes of the adopted UDP afforded via the provisions of PPW.

Adopted Wrexham UDP 1996-2011 (February 2005)

- 3.04 The application site is shown unallocated on the adopted UDP Proposals Map. It lies within the Settlement Limit to which **Policy PS1** applies, and 700 metres to the west of the western edge of Wrexham Town Centre as defined on the Proposals Map Town Centre Inset.

Planning Strategy and Strategic Policies

- 3.05 Written Statement ('WS') para. 3.1 notes that the UDP planning strategy applies the sustainable development principles contained in national planning policy guidance. Para. 3.4 indicates that Wrexham is the principal town in the County Borough. It is

the hub of the local transport network and is where most of the main *retailing*, employment, leisure and public services are concentrated. *It is, therefore, the location most suited to significant additional development.*

3.06 The strategic policies of relevance in this case are:

- (a) **Policy PS1:** *New development for housing, employment, and community services will be directed within defined settlement limits/employment areas;*
- (b) **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...;*
- (c) **Policy PS4:** *Development should maintain the existing settlement pattern and character and be integrated with the existing transport network to help reduce the need to travel and encourage the use of alternatives to the car;*
- (d) **Policy PS7:** *The priority areas for new shopping and commercial office development will be the defined Wrexham Town Centre and district centre shopping areas;*
- (e) **Policy PS8:** *The transport network will be developed by providing an integrated range of travel options to and from principal residential, commercial, employment and education centres by making the best use of the existing road and rail network ... and by the encouragement of public transport, cycling and walking;*

Shopping Policy

- 3.07 WS para. 8.3 sets out the capacity for additional convenience and comparison floorspace based on the findings of a Retail Floorspace Assessment undertaken in 2001, noting that while there was capacity for additional comparison floorspace of 13,800 sq.m. by 2006: there was likely to be very little growth in convenience expenditure over the plan period and that there was no current capacity in this sector, so that no new sites should be identified in the UDP for convenience floorspace.

3.08 The Council's most recent (October 2007) Retail Floorspace Update confirms that there is a demonstrative qualitative need for additional convenience floorspace of 5,019 sq.m. net up to 2011, rising to 5,201 sq.m. by 2016, and for additional comparison floorspace of 5,519 sq.m. by 2011 rising to 14,170 sq.m. by 2016. It is clear that on the basis of the 2007 Update there *is* a quantitative requirement for further convenience floorspace in the County Borough.

3.09 Against this background, **Policy S4**, which refers to large-scale retail development states:

"LARGE-SCALE RETAIL DEVELOPMENT WILL BE LOCATED WITHIN THE SHOPPING AREA OF WREXHAM TOWN CENTRE AND WITHIN DISTRICT SHOPPING CENTRES. WHERE POSSIBLE, DEVELOPMENT SHOULD USE VACANT, UNDERUSED OR DERELICT LAND, OR BUILDINGS SUITABLE FOR CONVERSION, IN ORDER TO SUSTAIN AND ENHANCE THE ATTRACTIVENESS, VITALITY AND VIABILITY OF WREXHAM TOWN CENTRE AND DISTRICT SHOPPING CENTRES. DEVELOPMENT SHOULD INTEGRATE WELL WITH EXISTING SHOPPING AREAS.

WHERE A NEED IS IDENTIFIED FOR LARGE-SCALE RETAIL DEVELOPMENT AND IT IS DEMONSTRATED THAT THERE IS NO SITE AVAILABLE WITH WREXHAM TOWN CENTRE SHOPPING AREA OR WITHIN DISTRICT SHOPPING CENTRES, THAN A SEQUENTIAL APPROACH TO SITE SELECTION WILL BE TAKEN. THE NEXT PREFERENCE WILL BE FOR SITES ON THE EDGE OF THE WREXHAM TOWN CENTRE OR DISTRICT SHOPPING CENTRES; THEN IF THERE ARE NO SUITABLE SITES HERE (EDGE-OF-CENTRE), OUT-OF-CENTRE SITES WILL BE CONSIDERED. IN CONSIDERING BOTH EDGE-OF-CENTRE AND OUT-OF-CENTRE SITES, DEVELOPMENT SHOULD:

- A) WHERE POSSIBLE, USE VACANT, UNDERUSED OR DERELICT LAND, OR BUILDINGS SUITABLE FOR CONVERSION; AND
- B) BE ACCESSIBLE BY A CHOICE OF TRANSPORT, AND DOES NOT GIVE RISE TO SERIOUS TRAFFIC CONGESTION OR ROAD SAFETY PROBLEMS ON LOCAL HIGHWAYS THAT CANNOT BE ADDRESSED".

Other Material Policy Considerations

The Wales Spatial Plan 2008 Update

3.10 The Wales Spatial Plan Update provides a framework for the future spatial development of Wales. Wrexham County Borough comprises part of the North East Wales area, the strategy for which is to (inter alia):

- (a) strengthen key hubs (including the Wrexham-Deeside-Chester hub) as a focus for investment in future employment, housing, *retail*, leisure and services.

Planning Policy Wales (May 2002)

Introduction

- 3.11 PPW sets out the land use planning policies of the Welsh Assembly Government. It is supplemented by a series of Technical Advice Notes (TANs). Procedural advice is given in National Assembly for Wales/Welsh Office Circulars. PPW, the TANS and Circulars together comprise national planning policy which should be taken into account in the formulation of development plans and which may be material to decisions on individual planning applications.

Planning for Retailing and Town Centres

- 3.12 Chapter 10 of PPW sets out the Assembly Government's policies for Retailing and Town Centres (sections 10.1 to 10.3). These have been replaced by MIPPS 02/2005 which cancels sections 10.1 – 10.3.

MIPPS 02/2005: "Planning for Retailing and Town Centres" (November 2005)

- 3.13 MIPPS 02/2005 sets out the Assembly Government's policies for retailing and town centres which are to: Secure accessible, efficient, competitive and innovative retail provision for all the communities of Wales, in both urban and rural areas; promote established town, district, local and village centres as the most appropriate locations for retailing, leisure and for other functions complementary to it; enhance the vitality, attractiveness and viability of town district, local and village centres; and to promote access to these centres by public transport walking and cycling.
- 3.14 Para. 10.2.1 advises LPAs to develop through their community strategies and development plans a clear strategy and policies for retail development and for the future of town, district, local and village centres in their area. The plans should establish a hierarchy of centres and be clear about their function and future roles.

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- 3.15 10.2.7 advises that development plans may distinguish between primary and secondary frontages in town centres and consider their relative importance to the character of the centre. It advises that primary frontages are characterised by a high proportion of retail uses, while secondary frontages are areas of mixed commercial development including, for example, restaurants, banks and other financial institutions.
- 3.16 Para. 10.2.9 and 10.2.10 advise LPAs that in planning for new retail developments, they should in the first instance consider whether there is a need for an additional provision. Such a need may be quantitative to address a provable unmet demand for the provision concerned. Precedence should be accorded to establishing quantitative need for both convenience and comparison floorspace particularly as a basis for development plan allocations before qualitative factors are brought in to play. If there is no need for further development for retail uses then there will be no need to identify additional sites. If a need is identified, para. 10.2.11 advises LPAs to adopt a sequential approach to selecting sites i.e. town centre locations being first preference, followed by 'edge-of-centre' sites, district and local centres and then 'out-of-centre' locations accessible by a choice of means of transport.
- 3.17 Para. 10.3.1 advises that when determining a planning application for retail development, LPAs should take into account:
- (a) compatibility with any community or up-to-date Development Plan strategy;
 - (b) consideration of the need for the development/extension unless the proposal is for a site within a defined centre or one allocated in an up-to-date development plan;
 - (c) the sequential approach to site selection;
 - (d) the impact on existing centres;
 - (e) if redevelopment is involved whether it involves a net gain in floorspace and whether or not it is like-for-like in terms of comparison or convenience;
 - (f) the rate of take up of allocations in any adopted development plan;

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- (g) accessibility by a variety of modes of transport;
 - (h) any improvements to public transport;
 - (i) the impact on overall travel patterns; and
 - (j) the best use of land close to any transport hub in terms of density and mixed use.
- 3.18 Para. 10.3.3 advises that where need is a consideration precedence should be accorded to establishing quantitative need. It will be for the decision maker to determine and justify the weight to be given to any qualitative assessment.
- 3.19 Para. 10.3.4 advises on the sequential approach to site selection and requires developers to demonstrate that all potential town centre options are considered, then edge of centre options, before out of centre sites are considered. This approach requires flexibility and realism from LPAs and developers and retailers. Para. 10.3.5 requires that, in order to maximise the opportunities for new development in centres, developers and retailers will need to be more flexible and innovative about the format, design and scale of proposed development and the amount of car parking, tailoring these to fit local circumstances. Rather than propose developments with a mixture of large scale retail and/or leisure uses and a large amount of car parking.
- 3.20 Para. 10.3.6 advises that for major retail proposals LPAs should consider not only the incremental effects of that proposal but the likely cumulative effects of recently completed developments, together with outstanding planning permissions and development plan commitments in the catchment areas of those centres.
- 3.21 Para. 10.3.8 refers specifically to 'out-of-centre' food supermarkets, and notes that these should not be allowed if their provision is likely to lead to the loss of general food retailing in the centre of smaller towns, and that where the inclusion of post offices and pharmacies in 'out-of-centre' retail developments would be likely to lead to the loss of existing provision they should be discouraged by imposing appropriate conditions.
- 3.22 Para. 10.3.18 advises that planning applications for retail development should not normally be permitted on land designated for other uses. This advice applies

especially to land allocated for industry, employment and housing, where retail development can be shown to have the effect of limiting the range and quality of sites that would be available for such uses.

TAN 4: "Retailing and Town Centres (November 1996)

- 3.23 TAN 4 has not been cancelled by MIPPS 02/2005, but provides advice on how to assess the effects of retail development – employing methodology prevailing at the time it was published. It has largely been superseded by current practice which is 'need' led, but it includes a number of definitions which remain up to date.

Wrexham Local Development Plan – Preferred Strategy: Draft for Public Consultation (October 2007)

- 3.24 As noted at para. 3.04 above, the LDP does not carry the weight for development control purposes of the adopted UDP afforded by the provision of PPW.
- 3.25 The key strands of the Preferred Strategy, which are relevant in this case, are set out in the attached Planning Statement. In terms of retail policy this states that new medium and large-scale shopping will be directed to Wrexham Town Centre and the district shopping centres. 'Out-of-centre' development will only be considered subject to sequential approach and impact;

4. ASSESSMENT OF RETAIL PLANNING ISSUES

Introduction

4.01 As set out in Section 3, the site of the proposed foodstore is 700m from the western edge of Wrexham Town Centre and 1.2km from the 'Primary Shopping Street'.

4.02 This Section of the Report considers the retail planning policy issues raised by the opening of a Morrisons foodstore in this location. The following assessment considers the proposal against the key issues as set out in para. 10.3.1 of MIPPS 02/2005.

- (a) Compatibility with any community or up-to-date Development Plan Strategy;
- (b) Consideration of the need for the development/extension;
- (c) The sequential approach to site selection;
- (d) The impact on existing centres;
- (e) If redevelopment is involved whether it involves a net gain in floorspace and whether or not it is like-for-like in terms of comparison or convenience;
- (f) Accessibility by a variety of modes of transport;

(a) Compatibility with any Community or up-to-date Development Plan Strategy

4.03 The Wrexham UDP states that, new development for housing, employment and community services (which includes retail) will be directed to within defined settlement limits / employment areas (**Policy PS1**). The proposed supermarket falls entirely within the within the settlement limits of Wrexham and therefore satisfies the requirements of this policy.

4.04 **Policy PS3** advises that development should use previously developed brownfield land comprising vacant, derelict or underused land in preference to the use of

greenfield land. The application site was formerly occupied a Highways Depot (which includes various buildings and extensive areas of hardstanding). A locomotive depot and sidings formerly occupied the eastern and northern sections of the application site. The proposed supermarket will therefore be located on brownfield land (which is also vacant) and therefore is supported by Policy PS3.

- 4.05 **Policy PS4** advises that development should maintain the existing settlement pattern and character and be integrated with the existing transport network to help reduce the overall need to travel and encourage the use of alternatives to the car. The development will maintain the existing settlement pattern and character. It will effectively form an infill development between the ambulance depot and council office site to the west; hospital to the north; and Ruthin Road to the south. The area is mixed in terms of its character i.e. residential, with commercial and community uses and the proposed supermarket will contribute towards this mix of uses. The development will also be integrated within the existing transport network. It includes a replacement access onto Ruthin Road, which is a major route into and out of Wrexham. Ruthin Road also provides main bus routes into and out of Wrexham, which will serve the proposed superstore. Given also the existing substantial residential areas around the site we consider that the proposal will reduce the need to travel by car and encourage alternative modes of transport.
- 4.06 **Policy S4** refers to large scale retail development and advises that preference will be given to sites within Wrexham Town Centre and District Centres. Where need is identified and subject to the operation of the sequential approach, 'edge' or 'out-of-centre' sites will be considered, again seeking the use of vacant underused and derelict land; and be accessible by a choice of means of transport. There are no sequentially preferable sites (i.e. in centre of edge of centre) that could accommodate the proposed superstore (see paras. 4.21 to 4.31) and given that the site is vacant and it is accessible by a choice of means of transport then the requirements of Policy S4 have been satisfied.
- 4.07 On the basis of the above, we conclude that the proposed development is compatible with the development plan strategy. The site is within the defined settlement limits of Wrexham; it maintains the existing settlement pattern and character; it can be integrated within the existing transport network and is accessible by a choice of means of transport to reduce the need to travel; and it satisfies the 'sequential approach' and involves the use of vacant brownfield land.

(b) Consideration of the 'need' for the development

- 4.08 In February 2007, Wrexham County Borough Council commissioned an independent Retail Study, which was published by Driver Jonas as the 'Wrexham Retail Floorspace Update' in October 2007. The update assessed the need for additional retail floorspace in the Borough and confirms that there is a demonstrable quantitative need for additional convenience floorspace in Wrexham, which arises as a result of expenditure capacity of 5,019 sq.m. net up to 2011, rising to 5,201 sq.m. by 2016 and 5,427 sq.m. by 2021. This is more than sufficient to accommodate the net convenience goods floorspace of the Morrisons store (2,505 sq m), with a substantial surplus capable of accommodating another large convenience goods supermarket elsewhere¹. The likely 'design date' of the proposed store (when it will have settled fully into a uniform trading pattern) is 2011, so that established trading is unlikely to come on-stream before the capacity arises.

P&S Assessment of Need

- 4.09 Notwithstanding the above, we have undertaken our own retail assessment, based on:
- i) a telephone survey of more than 1,000 households in the Wrexham area to establish current shopping patterns, a likely catchment area for the proposed store, and estimated turnovers of existing foodstores and centres. The survey was carried out by an independent market research company during September and October 2008;
 - ii) an assessment of the area's existing retail provision, from site visits; and
 - iii) bespoke data sourced from 'Map Info' on population levels and expenditure estimates in the area.

The Household Survey

- 4.10 We commissioned NEMS, an independent market research company, to carry out a telephone survey of more than 1,000 households in the Wrexham area, as shown on the Study Area Plan in **Appendix RA1**.

¹ It is noted that since the publication of the 2007 Retail Study that Tesco have obtained approval for a supermarket in Cefn Mawr.

- 4.11 Please note that the study area is based on that adopted for the Council's 2007 Retail Study² and includes the whole of Wrexham County Borough (amended in line with postcode sector boundaries). You will note that the study area comprises four Zones, Zone 1 Wrexham North, Zone 2 Wrexham East, Zone 3 Wrexham South and Zone 4 Wrexham West:

Zone 1 Wrexham North

LL11/1, LL/2, LL11/4, LL12/0, LL128, LL12/9

Estimated Population: 38,159 (2008)

Zone 2 Wrexham East

LL12/7, LL13/0, LL13/7, LL13/8, LL13/9

Estimated Population: 40,933 (2008)

Zone 3 Wrexham South

LL14/1, LL14/2, LL14/3, LL14/4, LL14/5, LL14/6, LL20/7

Estimated Population: 36,884 (2008)

Zone 4 Wrexham West

LL11/3, LL11/5, LL11/6, LL20/8

Estimated Population: 21,782 (2008)

- 4.12 A copy of the household survey questionnaire is attached at **Appendix RA2**. The full survey results can be found at **Appendix RA3**.

Population and Expenditure

- 4.13 The population and expenditure from the Study Area has been obtained from MapInfo. Table 1 in **Appendix RA4** shows that in 2008 the area has an estimated population of 137,758 and taking into account forecasts in population change and expenditure, there will be the following amounts of available retail expenditure (Tables 3a and 3b **Appendix RA4**).

- Convenience Goods
£208.79m at 2008
£211.23m at 2011
£213.94m at 2014

² This study area was also adopted in the Wrexham Retail Floorspace Update – June 2004.

- Comparison Goods
£376.94m at 2008
£393.99m at 2011
£412.29m at 2014

- 4.14 Table 4 in **Appendix RA4** provides a schedule of the existing and any committed convenience retail floorspace in the Wrexham area and sets out a 'benchmark' turnover for each store, based on the retailer's company average sales density figures. We have then estimated how much of each store's turnover would come from the identified catchment area.
- 4.15 Table 6 in **Appendix RA4** compares the total available convenience goods expenditure against the benchmark turnover, to show the 'theoretical capacity' which could support the development of additional convenience goods floorspace. The identified capacity is £48.14m in 2008 rising to £48.50m in 2014.
- 4.16 The Morrisons store would have an expected convenience goods turnover of £26.63m, of which 80% would be drawn from the study area / catchment area, i.e. £21.30m. This is well within the identified convenience goods capacity figures set out above.
- 4.17 In terms of quantitative need for comparison goods retail floorspace, there is forecast to be significant growth of £35.35m in spending over the period 2008-2014 in the Wrexham area. The comparison goods turnover of the Morrisons store would be £5.67m, of which an estimated 80% would be drawn from the primary catchment area, i.e. £4.53m, i.e. approximately 13% of the total growth in comparison goods spending.
- 4.18 There is more than sufficient quantitative need for the new Morrisons store.

Qualitative Need

- 4.19 Although the Wrexham Floorspace Assessment Update (2007) suggests that there is not a clear qualitative need for further convenience floorspace within the Wrexham Town Centre catchment area, current national retail and town centre planning policy as set out at MIPPS 02/2005 indicates that precedence should be accorded to establishing quantitative need; and in any event the 2007 Retail Update

acknowledges that Morrisons is not represented in the town. Whilst the Update suggested that no major convenience retailer was actively seeking floorspace in Wrexham, this is clearly no longer the case, and a Morrisons store would improve choice and competition without (in the context of the identified level of quantitative need) being likely to result in any unacceptable impacts on existing centres.

- 4.20 In this respect, Morrisons is predominantly a food retailer, concentrating on the sale of groceries and other convenience goods rather than higher proportions and type/value of comparison goods, which are sold by other superstore operators such as Asda and Tesco. This minimises the extent to which Morrisons stores compete with conventional town centre comparison goods shops, and maximises their complementary role.

(c) The sequential approach to site selection

- 4.21 PPW and MIPPS state that the sequential approach to site selection should be applied to the selection of sites for retail development. In this case the proposed foodstore would be 700m from the western edge of the Wrexham Town Centre and 1.2km from the 'Primary Shopping Street'. We have therefore considered whether it would be appropriate to locate the proposal in any other defined centre, as set out in the assessment below.
- 4.22 We have considered potential alternative sites in and on the edge of existing town and district centres within the study area that could provide sufficient land for a foodstore with a gross floor area of 6,748 sq.m. with on site servicing facilities and sufficient parking (preferably adjacent to the store and at ground floor level).
- 4.23 Given the tightly drawn boundaries of the existing District Centres and Llangollen Town Centre within the study area and therefore the subsequent lack of development opportunities, we have concentrated our assessment of potentially sequentially preferable sites within and immediately adjoining Wrexham Town Centre. Where sites have been identified, an analysis has been undertaken of each site in order to establish its suitability, viability, availability and potential to accommodate the proposed scheme. A plan of the Sequential Sites is attached at **Appendix RA6** and the analysis of each is set out below.

Site 1: Cobden Mill

- 4.24 Site 1 is a cleared site located at the junction of Watery Road and Bradley Road, immediately adjacent to, but just beyond the designated Shopping Area. The site is approximately 1.3 hectares and has planning consent for residential development. The site is therefore unavailable for development.

Site 2: St Giles Way/Bridge Street

- 4.25 The site is partly-cleared and approximately 1 ha in size and is located on the corner of St Giles Way and Bridge Street, beyond the designated shopping area. The site forms part of the Wrexham Phase Two Brook Street and Bridge Street Area Regeneration Project. The wider regeneration area has planning permission for mixed-use development including residential, business and retail uses. The site is therefore not available for development.

Site 3: Brook Street/Bridge Street

- 4.26 Site 3 is approximately 0.7 ha and is located on the junction of Brook Street and Bridge Street, beyond the designated shopping area. The site is separated from Site 2 by Bridge Street. The site is partly cleared, however there are still a number of properties in use. It is subject to a planning consent for a mix of uses, which covers this site, Site 2 and Site 5, as part of the Phase Two Brook Street and Bridge Street Area Regeneration Project. Based on this, the site is not available for development.

Site 4: Pen Y Bryn/Tenters Square

- 4.27 This site lies immediately to the south of Site 3, to the east of Pen Y Bryn. It is 1 ha in size and forms part of the Brook Street and Bridge Street Area Regeneration Project, which is subject to planning consent for a mixed use development, comprising residential, business and retail uses.

Site 5: Wrexham Bus Station

- 4.28 The Bus Station site is located on King Street within the defined Shopping Area and immediately adjacent to Lord Street, which is designated as a Primary Shopping Street. The site is approximately 0.7 ha in size and is therefore too small to

accommodate the proposed store. The site still operates as a Bus Station and is therefore not available for redevelopment. Any redevelopment of the site would have to involve the relocation of this facility.

Site 6: Public Car Park, Chester Street

- 4.29 This 1 ha site is located on Chester Street, just beyond the Shopping Area boundary. The site is currently a 'pay and display' public car park serving the adjacent Wrexham County Borough Council offices, Wrexham County Court and ITV Wales. The car park is well used and not available for redevelopment. Any proposed redevelopment is likely to be met by resisted as a result.

Vacant units

- 4.30 In terms of vacant units within the Town Centre, four units were identified with gross external floorspaces of over 1,500 sq m during the site visit undertaken on 21 October 2009. These units consist of the former Woolworths on Hope Street/Lord Street, the former M&S on Hope Street, the former Dorothy Perkins/Burton on Hope Street and the former MFI unit on Mount Street. The former of these three units are located on Principal Shopping Streets. The former MFI unit is located just beyond the defined Shopping Area. These sites are too small for Morrison's requirements and are therefore not suitable for development as a convenience supermarket, which is able to compete with existing out-of-centre stores in Wrexham.

Summary

- 4.31 Based on the above assessment, we are not aware of any alternative sites in or on the edge of Wrexham Town Centre that are currently available, suitable or viable for the proposed Morrisons foodstore.

(d) The impact on existing centres

- 4.32 In this section we have undertaken an assessment of the likely effect of the proposed Morrisons store on stores within the study area, and further afield
- 4.33 The new Morrisons store is likely to compete most directly with other stores which offer a similar bulk food shopping function. Those stores with which the Morrisons

Proposed Morrisons Superstore Land at Ruthin Road, Wrexham

store would be likely to compete most directly in terms of nature of provision, function and proximity are:

- Tesco Extra, Crescent Road, Wrexham;
- Asda, Holt Road, Wrexham; and
- Sainsburys, Plas Coch, Wrexham.

4.34 The results of the household survey³ confirm that these three stores are the most popular stores across the study area i.e. 70% - 87% of respondents carry out most of their food shopping at these three stores. It also confirms that these three stores are trading in excess of company averages i.e. that they are 'overtrading', which is an indicator of need for additional retail development. Details of the benchmark and actual levels of trading are set out in the table below:

Store	Benchmark Convenience Turnover 2008 ⁴	Total Convenience Turnover from Wrexham Area ⁵	Undertrading / Overtrading
Asda, Holt Road	£29.74	£52.21	176%
Tesco, Crescent Rd	£27.97	£43.02	154%
Sainsburys, Plas Coch	£24.27	£36.61	151%

4.35 Table 8 in **Appendix RA4** shows the estimated trade diversion of the proposed store, the majority of which will be from these three stores and it can be seen that the level of impact on other smaller stores would be limited. In view of the significant levels of overtrading of each of three main stores (i.e. Asda Tesco and Sainsburys), it is expected that the trade diversion to the proposed Morrisons stores will have the effect of reducing these levels of overtrading. Furthermore, since the Sainsburys at Plas Coch and Asda at Holt Road are 'out-of-centre' facilities and the Tesco store at Crescent Road is an 'edge of centre' facility, trade draw from these locations would have no implications in planning policy terms.

4.36 We have also carried out a 'healthcheck' assessment of Wrexham Town Centre, Llangollen Town Centre and all other District Centres within the study area. This is attached at **Appendix RA5**. This assessment shows that the Wrexham Town Centre

³ Page 11 – Data Tabulations by Zone, Page 11 Appendix RA4

⁴ Table 4 Appendix RA4

⁵ Table 5 Appendix RA4

and Llangollen Town Centre are both vital and viable shopping centres with low levels of vacancies and high levels of pedestrian flows. In addition, with the exception of Cefn Mawr, all the District Centres appear to be vital and viable, although it is noted that convenience retailing is limited to smaller stores.

4.37 Cefn Mawr currently suffers from high vacancy rates with limited retail offer in terms of convenience goods. We note that Tesco have obtained planning permission for a supermarket adjacent to the district centre, which will substantially improve the convenience offer and should assist in improving the centres vitality and viability. Table 8 in **Appendix RA4** estimates that there will be a small amount of trade diversion from this proposed new Tesco at Cefn Mawr (i.e. £0.5m). However, this is not considered to be significant in terms of the anticipated turnover of the store (i.e. £17.04m for convenience goods⁶) and will therefore not pose any significant threat to the planned new store.

4.38 The comparison goods offer within the Morrisons store would be restricted to a small range of homewares, books, cards and recorded music, which customers would make as an 'impulse' purchase as part of their main food shopping trip. The store would not function as a comparison goods shopping destination in its own right, and any impact on the town centres and district centres comparison retailers would be very limited.

Conclusion: Retail Impact

4.39 The new Morrisons store is likely to compete most directly with other stores which offer a similar bulk food shopping function, most of which are edge of centre / out-of-centre. The existing town centres and district centres will experience some small trade diversion, however this will not threaten their vitality or viability.

⁶ DPP Planning and Retail Assessment September 2008 – Appendix 3, Table 5

(e) If redevelopment is involved whether it involves a net gain in floorspace and whether or not it is like-for-like in terms of comparison or convenience

- 4.40 The application proposes the demolition of a number of small vacant buildings, formerly part of the highways depot. The proposal therefore provides an overall net gain in terms of retail floorspace of 6,748 sq.m. gross, to be used for both convenience and comparison goods sales.

(f) Accessibility by a variety of modes of transport

- 4.41 MIPPS and Policy S4 of the UDP requires new retail development to be accessible by a choice of means of transport and that consideration should be given to whether the proposal would have an impact on the overall distance travelled by car and the effect on local traffic levels and congestion. Similar advice is set out at PPW and TAN 18.
- 4.42 The Transport Assessment (TA) concludes that the application site has a large walk and cycle catchment areas for customers and also for staff. The submitted scheme proposes measures to encourage cycling and walking as a modal travel by providing a 4m wide footpath/ cycle track along the northern boundary of the site, and linking this to Ruthin Road, to the south.
- 4.43 The TA confirms that bus stops are located adjacent to the site, on Ruthin Road; to the north of the site on Water Road / Croesnewyd Road; and to the east of the site on Bradley Road. These provide various services in to and out of Wrexham and to the surrounding residential areas. The TA concludes that the Morrisons store will be accessible by a choice of means of transport, that the increase in trips brought about by the new store would have no significant impact on the surrounding highway network or the operation of the access, and that there will be no detrimental effect on the distances travelled.

Conclusion: Accessibility

- 4.44 The existing store is accessible by a choice of means of transport. The proposed new store will have very good non-car accessibility, which is a key aim of Planning Policy Wales, and furthermore, Morrisons will introduce their company staff Travel Plan to encourage more sustainable travel.

5. SUMMARY AND CONCLUSION

- 5.01 The application site is in an 'out of centre' location, however we conclude that there is planning policy support for the proposed development.
- 5.02 We have considered the retail planning policy issues, in particular those set out in MIPPS and UDP Policy S4, in respect of the proposed Morrisons store in Wrexham, and it is concluded that:
- The site is within the settlement limits of Wrexham; it maintains the existing settlement pattern and character; it can be integrated within the existing transport network; it is accessible by choice of means of transport and satisfies the sequential approach. The proposed development is compatible with the development plan strategy;
 - There is an immediate quantitative need for the proposed Morrisons store, based on: surplus capacity in the catchment area and overtrading at existing stores in the area;
 - The new Morrisons store would improve choice and competition (in the context of the identified need); Morrisons is a predominantly food retailer concentrating on convenience goods, which will minimise the impact on conventional town centre comparison goods shops, and maximises their complementary role;
 - There are no alternative more central sites to accommodate the identified need for a new foodstore;
 - The impact of the proposal on existing centres is likely to be very low, given that the Morrisons store will compete for trade with other similar large stores, which are either edge of centre or out-of-centre; and
 - The new store will be accessible by a choice of means of transport, particularly to pedestrians from the surrounding walk-in catchment.
- 5.03 We therefore consider that the proposal satisfies the relevant retail planning policy tests, as set out in the adopted UDP, and national policy guidance in Planning Policy Wales and the Ministerial Interim Planning Policy Statement on Retailing and Town Centres.