
SUPPORTING STATEMENT

Tesco Car Park
Pontardawe

Planware Ltd
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Executive Summary

This statement has been prepared on behalf of McDonald's Restaurants Ltd, in support of an application for a freestanding McDonald's restaurant with drive thru, car parking, landscaping and associated works, including customer order displays (COD) and a play frame, and associated works to the site. The proposal, which is for both the sale of food and drink for consumption on and off the premises, is Class A3 within the Use Classes Order.

The application is supported by a full suite of drawings and supporting documents, which demonstrate that the proposal fully accords with the overarching sustainable objectives, in terms of economic, social and environmental and falls within the parameters of national and local policies.

The proposal represents a multi-million-pound investment by a national operator in Pontardawe and the restaurant is expected to employ more than 120 full and part time staff, which McDonald's seeks to recruit from the local area.

The site forms an existing retail car park to the south of Pontardawe Town Centre. Between the site and the town centre there is a range of retail provision at the Retail Park. The town centre itself is small and is not large enough to accommodate a freestanding drive-thru restaurant. The proposal site forms part of an existing wider retail provision which would share a number of joint and linked trips and is considered wholly appropriate.

Pre-application advice was received in April 2020. This has helped inform the scope of the application and the supporting documentation provided.

In summary, the proposal represents sustainable development of a prominent brownfield site, which will provide a range of local jobs to the area. McDonald's design team have taken into account the site-specific design background of the surrounding area and provided a comprehensive justification of the development and how it complies with key policies.

1. Introduction

- 1.1. This statement has been prepared in support of an application submitted by McDonald's Restaurants Ltd for a new Drive-Thru McDonald's restaurant at Pontardawe.
- 1.2. The McDonald's brand is globally recognised and has been trading in the UK since 1974. The company trades from over 1,280 restaurants across the UK (+90 in ROI) and has a workforce of approximately 125,000 people (+5,000 in ROI). Over 81% of restaurants are operated as local businesses by franchisees. The restaurants are either located in high streets or town centres; on retail parks; and standalone 'roadside locations'.
- 1.3. The application is for a freestanding McDonald's restaurant and associated works to the site. The proposal, which is for both the sale of food and drink for consumption on and off the premises, is Class A3 within the Use Classes Order.
- 1.4. The following documents are submitted with this planning application:
- Application form;
 - Drawings:
 - 6682-SA-8823-AL01 Site Location Plan
 - 6682-SA-8823-AL03 Site Layout Plan - As Existing
 - 6682-SA-8823-P002 Block Plan
 - 6682-SA-8823-P004 Site Layout Plan - As Proposed
 - 6682-SA-8823-P005 Building Elevations and Section
 - 6682-SA-8823-P006 GA and Roof Plan
 - 6682-SA-8823-P024 Site Layout Plan - Tesco Site Plan
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- The requisite application fee;
- Noise Assessment
- Odour Control Assessment
- Phase 1 Ground Conditions Desk Study
- Phase 2 Ground Investigation Report
- Construction Environmental Management Plan
- Transport Assessment
- Travel Plan
- Proposed Engineering Strategy (Levels)
- Drainage Strategy
- Flood Consequence Assessment
- D-465054_CALC_McDonalds Tesco, Pontardawe – Lighting Design

1.5. The remainder of this statement is structured as follows:

1.6. In Section 2 we include an analysis of the site and the character of the area; the designation of the site and any relevant planning history.

1.7. In Section 3 we set out the proposal, which includes a review of the various supporting statements and the necessary mitigation included within the overall design.

1.8. In Section 4 we consider McDonald's approach to environmental sustainability including economic, social and environmental objectives, in line with national and local policy.

1.9. Conclusions have been set out in Section 5.

2. Site Analysis

- 2.1 The site forms part of the existing Tesco car park, adjacent to the petrol filling station.
- 2.2 Pre-application advice was received in April 2020. This has helped inform the scope of the application and the supporting documentation provided.
- 2.3 The site is located to the south of Pontardawe Town Centre. The town centre is too small to accommodate a freestanding drive-thru restaurant. The site forms part of an existing retail car park which would benefit from a number of joint and linked trips. The site is considered highly accessible due to the existing footbridges to the west and east of the site.

3. The Proposed Development

The Proposal

- 3.1 The proposed development comprises of a modern freestanding single storey McDonald's restaurant with drive-thru, car parking, landscaping and associated works, including customer order displays (COD) and a play frame. Provision is made for takeaway customers, both from the counter and from the drive-thru lane.



Example of the building

- 3.2 The restaurant has a GEA (including the corral and freezer chiller) of 377.3 sqm, and the GIA is 350 sqm, with a dining area of 78sqm.

Key Areas	Size
Dining Area	78sqm
Ancillary Public Area	46.4 sqm
Kitchen/Staff Areas and Back of House Storage ec.	197.9 sqm

- 3.3 The customer seating area comprises 76 covers for visitors to eat their meals within a relaxed modern environment. The dining area will include a variety of seating types and table sizes tailored to the customers' needs.
- 3.4 The proposal includes 31 car parking spaces, inclusive of provision for 2. accessible bays, 6. reserve bays and 3. Electric vehicle charging bays. Furthermore, there are 6 covered Sheffield customer bike stands, for an overall provision of 12 cycle spaces.
- 3.5 Cycle and pedestrian access points has been included within the design, to ensure the safe passage from the surrounding footpath network, which is included in the Transport Statement.
- 3.6 A Travel Plan accompanies the application, which outlines the action plan and timescales for implementation of defined measures to improve active travel.
- 3.7 This application includes the introduction of a fast forward lane, which will allow for a customer to pull forward to a third booth, if there is a small delay in the order, rather than driving through to the Grill Bays. This allows the traffic flow to be maintained through the drive-thru lane and is an operational improvement, in line with safety and speed of service.
- 3.8 An external play area is located on the new patio area, with facilities for younger customers to climb and explore. The specification of the structure has been included as part of the supporting documentation.
- 3.9 There is a corral at the east of the building, where all the rubbish is stored and managed for recycling in large containers, as shown on drawing 6682-SA-8823-P006. There is access via double doors for the delivery lorries and an internal door, which links the corral to the main

restaurant for the crew members. The corral is configured to optimise waste management, with a refuse compactor on site, to minimise the journeys required to remove the waste.

Residential Amenity

- 3.10 McDonald's recognises the potential impact on local amenity and during the design process all elements are reviewed, to ascertain whether mitigation is required and include within the overall proposal.
- 3.11 Potential noise and odour impact is assessed according to location and a 'best practice' approach is adopted to ensure the right control measures are incorporated into the ventilation systems where required to prevent negative impacts.

Noise

- 3.12 An Environmental Noise Assessment has been submitted to support the application, which has reviewed the impacts of the development and the necessary mitigation measures. This concludes that the proposal could trade on an unrestricted basis without causing any adverse impacts.

Odour

- 3.13 The proximity of sensitive receptors to the point of kitchen emissions forms the basis of an odour nuisance assessment, to ascertain the level of odour control provision.
- 3.14 The application has been supported by an Odour Control Assessment, which has analysed the proximity of the sensitive receptors and has recommended that mitigation should exceed the minimum recommendations to provide absolute comfort that nuisance from kitchen extract odours will not be experienced.

External lighting

- 3.15 An external lighting design has been submitted, which shows how the proposed site will be lit as part of the wider Tesco car park.

Anti-social behaviour

- 3.16 The restaurant shall maintain a strict protocol for ensuring noise and disturbance is kept to a minimum. All shift managers shall receive conflict resolution training sufficient to ensure they can deal effectively with noise or anti-social behaviour. Good management training and practices, in combination with appropriate physical security equipment, will reduce the risk of crime and disorder.
- 3.17 Tackling Anti-Social Behaviour is a key part of delivering the best possible customer experience. Tackling Anti-Social Behaviour is also key in delivering their duty of care obligations to their people, providing a great place to work where employees feel energised, safe and valued.

Litter

- 3.18 Litter is managed by the local council through the Environmental Protection Act 1990 which makes dropping litter an offence. The planning system cannot address unlawful acts, i.e., dropping litter or parking on yellow lines. McDonald's is committed to tackling litter in as many different ways as possible.
- 3.19 It is company policy to conduct a minimum of three daily litter patrols, whereby employees pick up not only McDonald's packaging, but also any other litter that may have been discarded in a 150m vicinity of a restaurant. This may be expanded to suit local needs.
- 3.20 Litter bins are provided outside all restaurants, as shown on the drawings and packaging carries anti-littering symbols to encourage customers to dispose of litter responsibly. Anti-

littering signage is displayed within restaurants and car parks, and support is given to Keep Britain Tidy, Keep Wales Tidy, Keep Scotland Beautiful, Keep Northern Ireland Beautiful and Capital Clean-up.

Land Contamination

- 3.21 A Phase I and II Investigation Report has been submitted to support the application. The Phase II report also addresses Coal Mining.

Sustainable Urban Drainage System

- 3.22 Responsible management of water is achieved through a variety of approaches. The implemented approach to the site drainage strategy has been reviewed during the design process. In addition, the implementation of a drainage dosing regime, which will improve the quality of discharge water. Full details of the proposed drainage strategy are outlined within the accompanying report.

Site Ecology and Biodiversity

- 3.23 Each proposed McDonald's site is carefully selected and subjected to assessments to determine the baseline ecological conditions for the site. This information is crucial to ensure compliance with wildlife legislation as well as National and Local Planning Policy relating to biodiversity.
- 3.24 Ecological baseline information is used to ensure potential effects of the development upon flora and fauna can be suitably managed. Furthermore, any constraints upon the proposed development of the site, imposed by site ecology, can be assessed. The mitigation hierarchy is applied to, in the first instance, avoid harm, minimise the effects of the development upon the site's ecology and finally, where necessary, to compensate through habitat creation.

- 3.25 The site is considered to have limited ecological benefit, given it forms an existing car park. A detailed enhancement plan has been provided which aligns with the proposed landscape plan, which shows significant enhancement to onsite biodiversity. The proposal accords with Policy 9 of Future Wales.

Landscaping

- 3.26 Landscaping is proposed where practical to enhance the existing site conditions. This is detailed on the accompanying landscape plan.

Accessibility

- 3.27 Public access into the building shall be open during hours of restaurant dine in trade, with the principle entrance being in the form of automated sliding doors. This provides a convenient access for all pedestrians. Safety sensors will be fitted to ensure that the door does not close against pedestrian traffic.
- 3.28 The dining area is designed to best meet the aims and objectives of the Equality Act by providing a varied level of service to suit the widest possible range of needs. A variety of seating is provided with high and low tables and a mix of fixed and loose seats. Floor and wall materials have been chosen not only to reflect McDonald's brand but to provide good levels of contrast between surfaces for users with visual impairment. Circulation routes are provided throughout the seating area to promote access for all, including wheelchair users.

4. Sustainability

- 4.1 Planning Policy Wales (Edition 11 – 2021) seeks to deliver sustainable development through the overarching objectives - economic, social, environmental and cultural.
- 4.2 The following commentary sets out how McDonald's proposals align and contribute to these key strands of sustainability, both nationally and locally.

ECONOMIC SUSTAINABILITY

National

- 4.3 McDonald's employs around 125,000 people across the UK, with a mix of all ages and life stages.
- 4.4 People are at the heart of the business and, as a responsible and proud employer, McDonald's are committed to investing in them. To ensure the needs of all staff are met, and so attract and retain the best talent, the range of employment options has been expanded, with the Guaranteed Minimum Hours Contracts (GMHC) rolled out to all UK restaurants.
- In the workplace, flexibility, opportunity, equality and development are promoted.
 - Over 85% of McDonald's employees have said that they love the flexibility their job offers them.
 - 90% of Business Managers started as Crew Members.
 - 33% of the Executive team started their career in one of their restaurants

- Each year McDonald's invest £43million in training to develop their people

Local

- 4.5 The latest figures available show that McDonald's contributed £5.95 million to the economy in Neath Port Talbot. Of this total, 85% is associated with the value of the meals sold in restaurants and the remaining 15% is the value of expenditure with suppliers and driven by the multiplier effect of employees in their company-owned and franchised restaurants, and employees supported by the supply chain, spending their wages in the local economy.
- 4.6 In 2017, McDonald's supported 440 jobs across Neath Port Talbot; 379 in their restaurants and 61 in the supply chain and in the wider economy.
- 4.7 McDonald's source a range of products from within Wales. McDonald's buy packaging from Welsh companies Seda UK and Transcend Packaging. Welsh Farmers also benefit from £15 million of income each year as a result of McDonald's, for products such as beef, milk, pork and animal feeds.

The New Restaurant

- 4.8 The proposal represents a multi-million-pound investment by a national operator in Pontardawe, providing a family restaurant, along with local jobs with wider training opportunities.
- 4.9 The proposed restaurant is expected to employ more than 120 full and part time staff, which McDonald's seeks to recruit from the local area.

SOCIAL SUSTAINABILITY

- 4.10 McDonald's is committed to be a valued and responsible member of communities in which it operates. Alongside strong staff training programmes and environmental initiatives McDonald's also supports Ronald McDonald House Charities (RMHC) and encourages young people to lead more active lives.

McDonald's has a track record of enabling and encouraging young people to participate in sports, including a long tradition of supporting community football and Olympic sponsorship.

Training

- 4.11 McDonald's commitment to staff education incorporates both internal training programmes and externally recognised qualifications. The McDonald's training philosophy centres on career long learning – “from the crew room to the boardroom”. McDonald's is recognised as a “heavy lifter” by the Work Foundation as it recruits on the qualities not the qualifications of applicants.
- 4.12 Crew members receive on-going training of which regular assessment forms a part. The ratings from these assessments are then discussed at each employee's Performance Review. McDonald's invest more than £43 million in training each year and those employed at the proposed restaurant would be given the chance to undertake structured training including the opportunity to gain nationally recognised qualifications in hospitality, literacy and numeracy.

Local Community Projects

- 4.13 McDonald's franchises are active supporters of local grassroots football teams and sports events. Franchises and their teams can regularly be spotted taking part in litter collection days such as the All Wales Beach Clean and Keep Wales Clean Tidy Campaign.

Football

- 4.14 Since 2002, McDonald's has partnered with the four UK Football Associations, providing financial support to improve the standards and growth of grassroots football across England, Scotland, Wales and Northern Ireland. Local employees and restaurants have also been involved.
- 4.15 McDonald's Club Twinning was launched in 2008 and there are now over 900 restaurants twinned with local clubs, providing coaching and business support as well as providing thousands of players with donated kit and equipment.
- 4.16 McDonald's continue their role as Official Community Partner of all four UK Football Associations..
- 4.17 This new programme has a target to provide 5 million hours of fun football for children across the UK by 2022 and to give over 500,000 children the chance to try football for the first time through the Fun Football 'turn up and play' sessions, Festivals and Activity Books, the majority of which are free to the public. Aimed at introducing 5–11-year-olds to football for the first time, the programme will include introductory drills perfect for children with no footballing experience.
- 4.18 The ongoing partnership will help ensure that McDonald's can continue having a role in encouraging young people to have a lifelong love of sport and an active lifestyle. To-date, the programme has included:
- Training over 30,000 new qualified grassroots coaches
 - Supporting over 10,000 grassroots clubs via the UKFA's club and league accreditation programmes
 - Providing over 250,000 new football kits to kids teams across the UK
 - Recognising over 5,000 local football volunteers, clubs, and projects to date via our nationwide Grassroots Football Awards programme
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Ronald McDonald House Charities

- 4.19 Ronald McDonald House Charities UK (RMHC) is an independently registered charity which helps support families while their children are in hospital or a hospice. RMHC provide free 'home away from home' accommodation to allow families to stay close to their ill children. They operate 12 Houses from NHS hospitals across the UK, and give families a warm and comfortable place to rest, eat and relax, just moments away from their child's hospital ward. Since 1989, RMHC have supported over 50,000 families and now support 6,000 families each year
- 4.20 RMHC has been McDonald's charity of choice since the Charity was founded in the UK in 1989. Since then, McDonald's and its Franchisees have raised over £85million for the Charity.
- 4.21 As well as donating part of their profits, McDonald's and its Franchisees also hold annual fundraising days, provide free office space, business resources and advertising.
- 4.22 The charity's biggest source of income comes from the collection boxes in McDonald's restaurants, through which customers give millions of pounds each year. In 2017, these boxes provided over £3m donated by McDonald's generous customers. In 2019, the option of donating to RMHC via the cashless in-store kiosks was introduced, which has significantly increased the amount donated by customers. This allows customers to round up to the nearest pound or give set donations of 1p, 10p or 20p of which 100% is given to RMHC.

ENVIRONMENTAL SUSTAINABILITY

- 4.23 The scale of the business means McDonald's have an opportunity to have a positive impact on some of the biggest challenges facing the world today. The threat of climate change is one such challenge and McDonald's are proud of the investment they have made to reduce their carbon footprint in the UK.

- 4.24 McDonald's was the first restaurant chain to set science-based greenhouse gas reduction targets at a global level. Working with all franchisees, their aim is to reduce greenhouse gas emissions related to all restaurants and offices by 36% by 2030. Additionally, McDonald's are committed to a 31% reduction in emissions intensity (per metric tonne of food and packaging) across the supply chain by 2030.
- 4.25 To meet these targets, McDonald's buy 100% renewable electricity and have invested in long term partnership agreements to develop the renewable energy infrastructure in the UK.
- 4.26 The absence of on-site fossil fuel use, together with McDonald's electricity procurement agreements, eliminates the production of greenhouse gases from on-site operations. In recognition of global warming potential (GWP) associated with refrigeration gases, McDonald's have moved to the latest reduced GWP air conditioning refrigerants ahead of any legislation in this regard.
- 4.27 The proposed restaurant will include 3no. electric vehicle charging bays, to allow for customers to charge their electric vehicles. The proposal accords with Future Wales Policy 12.

Waste and Use of Recycled Material in Construction

- 4.28 Materials used for construction of the restaurant are suitable for recycling and include steel portal frame and recycled materials, where possible.
- 4.29 Materials for the building are selected to provide the required aesthetics combined with maximum durability and robustness. The requirement for replacement, maintenance and repair will be minimal during the building lifecycles, thus providing a good low level of energy input over the whole lifecycle. From 2023, furniture will be sourced from recycled

or certified materials and designed to be recycled or reused at end of life, as part of the McDonald's Plan to Change.

The Building

- 4.30 The design of the new building has been directly influenced by sustainability and the standard practices to enable the reduction in their carbon footprint. Approximately, 90% of new restaurants are built using modular construction techniques, which use considerably less energy, inclusive of the reduction of the total number of deliveries to site during the build.
- 4.31 Modular construction takes place in a controlled environment, which allows a highly monitored and efficient process, where leftover materials can be used in future projects and ultimately reduce the general building waste.
- 4.32 The construction time is also reduced, minimising the potential disruption to neighbours.
- 4.33 The external shell is designed to prevent air leakage and achieve the U-value required by current building regulation standards.
- 4.34 McDonald's utilise a sophisticated building management control system with specifically engineered energy reduction strategies to maximise operating efficiencies. McDonald's kitchen appliances have standby reminders and a metering system has been introduced which measures the amount of electricity used in every half hour of the day. Restaurant Managers receive daily graphs to help them make energy saving adjustments.

4.35 All new restaurants are fitted with standard equipment and maintenance programmes, in line with Green Building Guidelines, which were introduced as a McDonald's Europe initiative and include:

- Lighting - LED lighting is also used, resulting in a 50% reduction in energy use compared to fluorescent lights.
- Water - Auto shut-off taps fitted to wash-hand basins in addition to flow control limited to 6l/min; replacement of urinals with waterless units and WC's fitted with dual flush of 4.5l and 3l flushes (unless external drainage requires greater volume). In addition, systems are leak checked with hot water temperatures reduced to a maximum of 60 degrees C. Pipes are checked for missing insulation.
- HVAC - Automatic closures fitted to all internal doors and draft-proofing fitted or repaired to all doors and windows, including the use of energy save reminder stickers in the back of house area. Variable speed control fans are installed so that they are not required to run when ventilation is not required and room sensors installed to monitor internal air temperatures.

Minimising Transport Impacts and Reducing Carbon Dioxide Emissions

4.36 Cooking oil from restaurants is recycled into biodiesel using local collectors. The biodiesel is then used as fuel by McDonald's vehicles. Biodiesel is now being used in all delivery trucks and results in a carbon saving of 8,200 tonnes per annum.

Recycling Strategy and use of Recycled Materials.

4.37 Within the supply chain, McDonald's vision is one where all food and packaging is sourced sustainably. They have undertaken a number of measures in recent years to try to promote better environmental standards through the whole supply chain.

- McDonald's is committed to using recycled materials wherever possible, throughout the business and have stepped up their commitment to recycling further, setting global goals, including 100% of McDonald's guest packaging will come from renewable, recycled or certified sources and 100% of guest packaging will be recycled in McDonald's restaurants, by 2024.

4.38 The business has taken a number of steps to continue to lead when it comes to sustainable packaging and further address the issue of reducing plastic across the supply chain:

- The removal of plastic lids from McFlurry will see 385 tonnes of plastic removed from the supply chain each year.
- The introduction of fibre based salad boxes will also see 105 tonnes of plastic removed annually, and the new salad boxes can be recycled with any other paper.
- McDonald's are a member of the National Cup Recycling Scheme which brings together major retailers waste management companies and UK paper mills with the shared aim of growing the infrastructure needed to increase the number of paper cups being collected and recycled across the UK.
- McFlurry cups can be recycled along with other paper cups in one of the many recycling points that has been established across the country through the collaboration of retailers including Pret a Manger, Costa and McDonald's restaurants.
- Packaging recycling: 22k tonnes of outer packaging cardboard is recycled from restaurants every year - zero waste to landfill.
- Only 8% of the packaging used for McDonald's products is made from plastic, with the majority already being made from fully certified fibre.

- 4.39 McDonald's reuses delivery packaging wherever possible, in accordance with food safety laws. Over 80% of kitchen waste is recycled, which equates to 40% of total waste. Staff separate corrugated cardboard, used cooking oil, food waste, clean plastic paper and tin from all back of house areas for recycling.
- 4.40 All restaurants aim to recycle 100% of their corrugated cardboard, which in itself accounts for 15% of a restaurant's average total waste. In addition, the delivery trays and crates are returned to suppliers for reuse.
- 4.41 Delivery vehicles carry recyclable materials on return trips, backhauling over 80% of all cardboard.
- 4.42 McDonald's UK has a long-term goal to send zero waste to landfill by reducing operational waste, recycling as much as possible, and diverting the remainder to a more sustainable solution.
- 4.43 To further minimise waste, McDonald's has joined the Valpak distributor take back scheme, which ensures that redundant equipment is recycled with accredited companies.
- 4.44 Customer recycling stations are installed in all new restaurants, to allow customers to separate paper cups, plastic bottles and cups, and decant liquids. The cups will be sent to a specialist paper cup recycler and the plastic will be recycled along with the plastic from the kitchens. With good levels of separation, McDonald's new waste procedures could generate a recycling rate of up to 65%, exceeding the European target.

5. Sequential Approach

- 5.1 The proposal is located Out of Centre, but on an existing retail car park. Pontardawe itself has limited provision of A3 uses, including any drive-thrus. This proposal is considered an opportunity to provide an important complimentary leisure use alongside the larger retail unit.
- 5.2 The proposal is for a drive-thru restaurant, providing opportunity for a large number of joint and linked trips. The proposal will allow for customers to have a choice, of either using the drive-thru lane, or using the restaurant itself.
- 5.3 Whilst it is acknowledged that the site is outside of a designated centre, the proposal site is wholly appropriate in its proposed location, due to its proximity to the highway network and complementary use with the existing neighbouring uses, along with its high level of pedestrian accessibility with both footbridges connecting the site to the north and south.
- 5.4 Given the format of the drive-thru restaurant, it is considered that the proposed location within an existing retail car park is wholly appropriate.
- 5.5 It's important to give regard to relevant case law relating to sequential tests. In 2006, the courts held that it is not for the applicant to reduce or segregate their proposal so that it could be made to fit elsewhere stating:

The question is whether the alternative town centre site, in this case the existing Lidl site is suitable for the proposed development, not whether the proposed development can be altered or reduced so that it can be made to fit into the alternative site [Lidl UK GmbH v Scottish Ministers (2006)]

5.6 It is therefore not for the applicant to adapt their proposal to fit a site, rather to consider other sites that are of a suitable size that accommodates the proposal.

5.7 In 2012, the courts confirmed that directing applicants to smaller town centre sites is inappropriate. The suitability is directed at the developers proposal, not some alternative scheme:

To refuse an out-of-centre planning consent on the grounds that an admittedly smaller site is available within the town may be to take an entirely inappropriate business decision on behalf of the developer [Tesco Stores Ltd v Dundee City Council (2012)]

5.8 This case also established that if a site is not suitable for the commercial requirements of the developer then it is not suitable for the purposes of the sequential test.

5.9 The Rushden Lakes SoS decision (APP/G2815/V/12/2190175) references the Dundee case. In agreeing with the Inspector, the Secretary of State confirms that the Dundee case established the principal that if a site is not suitable for the commercial requirements of the developer in question then it is not a suitable site for the purposes of the sequential test. Thus, it is for the proposed development to be considered (not an alternative development), when looking at alternative sequential site. The Inspector states:

“There is no suggestion here that the sequential test means to refer to anything other than the application proposal.”

5.10 In light of the above, the proposal needs to be considered in context as a whole and cannot be segregated. The proposal is for a drive-thru restaurant and the elements of eating in or driving thru cannot be segregated. To segregate elements of the scheme would represent “an inappropriate business decision on behalf of the developer”.

- 5.11 To support the format of operation of freestanding drive-thru units we refer to an appeal against a refusal of planning permission for a drive-thru restaurant at Treloggan Road, Newquay (APP/Q0830/A/051182303). The Inspector stated that:

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

- 5.12 Given the policy considerations, the sequential hierarchy of Town Centre, Edge of Centre and Out of Centre has been applied within this assessment. Should the council (or any other party) be aware of any other sites they consider should be included in this assessment, then these sites should be identified by the authority, and as agents, we will suitably and properly consider the sequential implications.
- 5.13 The proposed development requires approximately 0.3ha of available space (subject to shape) to viably support a restaurant, drive-thru lane and associated parking. Any assessment of alternative sites needs to consider the operation of the proposed restaurant and the space required to successfully operate including sufficient parking to meet the operational needs of the proposal. This assessment is therefore in accordance with the requirement of 0.3ha. Such an approach complies with case law regarding the suitability of alternative sites.
- 5.14 Pontardawe Town Centre is defined on Inset Map 3 of the Local Plan. This shows the Town Centre predominantly forming either side of Herbert Street and also the High Street. The Town Centre is already densely developed, primarily forming terraced shops at ground floor. In addition, the Town Centre is geared towards the pedestrian, with narrow streets and a large pedestrianised area outside the Arts Centre. There are no sites at 0.3ha within the Town Centre suitable to accommodate the proposed development.

- 5.15 Moving to the edge of centre, the Alloy Industrial Estate is allocated for employment uses and the vacant land on Old Foundry Road is allocated for residential. The south of the town includes out of centre retail at Parc Manwerthu. This area is a similar distance to the Town Centre as the application site.
- 5.16 Through engagement with the local authority, a request has been made to assess Glanrhyd Industrial Estate in more detail. The site is allocated as an existing employment site under Policy EC2. This area is protected for B Class uses under Policy EC3 and EC4. The site is outside of a designated centre, similar in distance to the application site.
- 5.17 As confirmed in the recent appeal decision (APP/U2370/W/19/3226028) in Thornton Cleveleys, there is limited benefit comparing out of centre sites with other out of centre sites as the purpose of the sequential test is to protect centres. The key aspect of out of centre sites is that they are accessible.

'The Jubilee Park Harvester is closer to Cleveleys town centre. However, it is not in the town centre, being around 427m away. The sequential test is used to identify preferable sites in town centres for accommodating main town centre uses. Although the Jubilee Park Harvester is located closer than the appeal site to the town centre, both sites would be regarded as 'out of centre' as they are more than 300m away from the town centre boundary but not outside the urban area4.'

'In terms of the effect upon the vitality of the town centre, the Council present very little evidence to suggest why developing the Jubilee Park Harvester would ameliorate the vitality of the town centre, in comparison to developing the appeal site. The appeal site is accessible, being in the urban area near existing development, accessed off a main trunk road with a bus stop in walking distance. Thus, it is well connected to the town centre.'

‘Consequently, as both sites are ‘out of centre’, I see little reason why it would be sequentially preferable to develop one ‘out of centre’ site over another, having regard to the policy objective to support the vitality of Cleveleys town centre.’

- 5.18 The proposal comprises a complimentary leisure use to the existing adjacent supermarket and petrol filling station, which will benefit from the number of joint and linked trips. As outlined above, it is not for the developer to segregate their proposal to fit into an unsuitable site. As such, the proposed site has been selected as an appropriate out of centre location because of its complimentary form with the surrounding uses, its strategic location on the road network and its suitability for both a restaurant and a drive-thru lane.
- 5.19 In assessing out of centre locations, the site needs to be accessible. The site is considered highly accessible to pedestrians due to both foot bridges. Following engagement with the local highway authority and active travel team, enhancements have been made to the site layout, including a widened footpath, improved desire lines including new steps into the site and increased cycle parking provision.
- 5.20 The proposal intends to bring a drive-thru restaurant to Pontardawe. This will provide for unmet demand within the local area due to a lack of a drive-thru within the wider locality. The nearest McDonald’s is in Swansea. Based on sales data, 5% of trade at Morriston McDonald’s are from Pontardawe and the surrounding area. It is anticipated that the proposal would help keep people within Pontardawe through meeting this demand, preventing trade leaking out to neighbouring larger towns.
- 5.21 The proposal will also provide 120 jobs to local people, which will help boost the local economy through the reinvestment of wages within the local area. Further details of McDonald’s economic benefits to the local area are outlined in paragraph 4.5 above.

- 5.22 The operation of QSR's is different from traditional restaurant formats. QSR restaurants and coffee shops do not have defined catchment areas, there is no table booking, and trips are typically unplanned with many being spontaneous. This is more visible in the coffee market, but has applied to McDonald's for a significant period of time. The Transport Assessment includes statistics for the proposed store which are based on surveys and expected trading levels of the store. Only 43% of the traffic on Friday and 26% on Saturdays peaks will be Home-McDonald's-Home (additional) trips. A significant proportion of the remaining trips will be spontaneous and not planned. Individual spending at QSR restaurants is significantly lower than at destination or typical restaurants.
- 5.23 The proposed development would not deter someone who was already intending to visit the town centre from doing so as it is not considered that people would make a specific trip to the town centre purely for a takeaway. This is even less likely given the rise of delivery across the sector. It would be more likely that a visit to such an establishment would be on impulse as part of a wider shopping experience, such as visiting the Post Office, Bank, Library or general high street shopping.
- 5.24 It is not considered that McDonald's is a destination in its own right and as such the people intending to visit Pontardawe for reasons such as visiting the Post Office will not deviate from this because of the proposed McDonald's.
- 5.25 Given the high percentage of joint and linked trips it is very unlikely to discourage someone from specifically going to Pontardawe Town Centre who was already planning to do so. It is considered that the proposal would compliment the town centre, helping keep people within the local area and also providing 120 local jobs, which will in turn result in the reinvestment of wages into the local area. It is therefore considered that the proposal will not have a negative impact upon Pontardawe Town Centre and thus accords with Local Policy R3 and Future Wales Policy 6.

6. Conclusion

- 6.1 This statement has been prepared on behalf of McDonald's Restaurants Ltd in support of a planning application proposing development of a Drive Thru restaurant on land at Tesco Car Park, Pontardawe.
- 6.2 The proposals provide the opportunity for McDonald's to meet a long-standing requirement for a restaurant to serve this catchment area, to meet customer demand and introduce additional choice in the market.
- 6.3 The relevant planning policy at national and local level have been reviewed and are supportive of proposals to develop a McDonald's restaurant, with associated works at Pontardawe.
- 6.4 The proposed development represents a multi-million pound investment creating jobs both during the construction and operation phases, resulting in many associated economic benefits for the local area.
- 6.5 The proposed development will provide over 120 jobs for the community. Details have been provided on McDonald's training opportunities delivered through their internal management training programme and the ability for crew members to progress their careers within McDonald's.
- 6.6 Sufficient parking has been provided at the restaurant with accessible parking located as close to the restaurant entrance as possible. McDonald's actively encourage more sustainable methods of transport which have been detailed in the accompanying Transport Statement.
- 6.7 The design and layout of the proposal is appropriate in the area. Natural and neutral colours and materials will be used on the building and throughout the scheme to ensure the site integrates easily with the surroundings.
- 6.8 The site represents an appropriate location for a drive-thru restaurant, which will be well placed to offer refreshments to passing customers and those in the surrounding area.
- 6.9 In light of the above, we trust officers are able to support the application.