Ellie Jones

From: Paul Bevan | Cycling UK <paul.bevan@cyclinguk.goassemble.com>
Sent: 01 August 2024 08:57
To: planning
Subject: Planning application P/2024/1174 (LAND AT, BORDER RETAIL PARK, WREXHAM, LL13 8NG)

Follow Up Flag: Follow up
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Planning application P/2024/1174 (LAND AT, BORDER RETAIL PARK, WREXHAM, LL13 8NG)

Dear Sir/Madam

I write in reference to planning application P/2024/1174 (LAND AT, BORDER RETAIL PARK, WREXHAM, LL13 8NG).

It is positive to note that the application makes provision for 6 cycle parking spaces (via 3 'sheffield stands') and its proximity to key and proposed Active Travel routes within the Wrexham Integrated Active Travel Network Map should make it attractive to walking, wheeling and cycling access.

However, there is a lack of safe access to the site itself by Active Travel. Currently the Border Retail Park can be accessed either directly from the main retail park entrance (by exiting the cycleway infrastructure and joining the retail park roads past the Tesco fuel station), or by exiting Holt Road via a ramp (which is narrow and poorly lit) which joins the Retail park by Wickes. Both of these options are unattractive for cycle access.

The design provides for additional pedestrian crossings however these are 'within' the retail park and do not facilitate improved access to the site by foot. No extra cycle access provision is made in the design despite the Transport Statement noting the potential for cycle access. As a result, it is clear that the application is designed primarily for car access and therefore does not comply with Wrexham's Local Development Plan, specifically DM1 (Development proposals, where relevant, must: [...] Prioritise walking, cycling and public transport use ahead of travel by car) and Policy T1 (Development should in the first instance be accessible by walking and cycling, then by public transport and finally by private motor car) as well as a wide range of Wrexham and Welsh Government planning policies.

The 'red line' boundary of the application extends from the end of the WCBC Active Travel network through to the edge of Wickes (which is also within the applicant's ownership). Therefore it is reasonable to require the applicant to provide appropriate cycling infrastructure to the site, connected with the WCBC Active Travel Network and compliant with Welsh Government's Active Travel Guidance, as part of their application.

This would enable the application to be compliant with Wrexham and Welsh Government planning policies including:

Wrexham's LDP2:
SO4 (Promote active travel and use of public transport by locating new development in the most accessible and sustainable locations; and seek to alleviate known highway infrastructure capacity constraints on the road network within the County Borough and

Ensuring new development sites are located to maximise active travel and integrate with public transport opportunities)

SO6 (including Creating accessible, permeable, connected and legible places and reduce predominantly car-based developments to encourage active travel and Locating new developments in places where people can to walk and cycle to) a range and choice of facilities)

SO10 (including Promoting sustainable patterns of development, locating homes and jobs within close proximity to each other which are accessible by active travel modes)

Policy T2: Active Travel in general and specifically the policy that new development will be supported where: Walking and cycling infrastructure is an integral part of the overall design of the scheme; and Facilities that encourage and promote Active Travel including but not limited to appropriate signing, lighting, secure and convenient cycle parking and where appropriate shower and changing facilities are provided and Measures that work to reduce the dominance and speed of vehicles affording increased priority to pedestrians and cycle movements.

**Wrexham's Active Travel Network Map **

Future Wales: Particularly Outcome 7 and Policy 12 which states Active travel must be an essential and integral component of all new developments, large and small. Planning authorities must integrate site allocations, new development and infrastructure with active travel networks and, where appropriate, ensure new development contributes towards their expansion and improvement.

Planning Policy Wales Edition 12: particularly Section 4 including:

4.1.31 Planning authorities must support active travel by ensuring new development is fully accessible by walking and cycling.

4.1.32 Planning authorities must ensure new housing, jobs, shopping, leisure and services are highly accessible by walking and cycling.

4.1.33 Development plans must identify and safeguard active travel routes and networks, including those identified in the Integrated Network Maps required by the Active Travel Act, and support their delivery.

4.1.33 New development should be integrated with active travel networks and contribute to their expansion and improvement, through the inclusion of well-designed routes and facilities as part of the schemes and financial contributions to pay for off-site connections.

4.1.34 In determining planning applications, planning authorities must ensure development proposals, through their design and supporting infrastructure, prioritise provision for access and movement by walking and cycling and, in doing so, maximise their contribution to the objectives of the Active Travel Act.

4.1.35 New development must provide appropriate levels of secure, integrated, convenient and accessible cycle parking and changing facilities.

The Active Travel Act (2013) and Welsh Government Statutory Guidance

The Wrexham LDP2 states under Policy T2: Active Travel, that:

*Provision of infrastructure where appropriate and justified will be secured through planning conditions, planning obligations, Community Infrastructure Levy (if adopted) and matching transport funding. Design and Access Statements, Transport Assessments and Travel plans, where required, should detail how development proposals can support Active Travel. *

Therefore I urge the council to consider planning conditions related to the installation of appropriate cycling and walking infrastructure, compliant with Welsh Government's Active Travel Guidance and in line with WCBC's Active Travel Integrated Network Map across the 'red line' boundary of the site: from the A5152 roundabout Active Travel Routes to the Border Retail Park and the site itself.

Many thanks,

Paul Bevan

Local Representative of Cycling UK in the Cycle Advocacy Network

This email was sent on behalf of Cycling UK via Assemble.