MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO::	Sharon Holman
Our Ref:	ET/DC/MZ/P/2024/1174	**Your Ref:**	P/2024/1174
Date:	20/08/2024		

TOWN AND COUNTRY PLANNING ACT 1990

PROPOSAL: ADEILADU SIOP GOFFI GYDA CHYFLEUSTER CASGLU O FFENEST Y CAR, MYNEDIAD CYSYLLTIEDIG, GWAITH TIRLUNIO A GWASANAETHU / ERECTION OF COFFEE SHOP WITH DRIVE THRU, ASSOCIATED ACCESS, LANDSCAPING AND SERVICING

LOCATION: LAND AT, BORDER RETAIL PARK, WREXHAM, LL13 8NG

I refer to your consultation / email dated 01/07/2024 in respect of the above.

It is the LHA's understanding that the proposals are for the erection of a coffee shop with a drive thru, associated access, landscaping and servicing. The site is located at Border Retail Park which is accessed via the A5152 / Holt Street / Stryt Holt roundabout just to the east of Wrexham City Centre. There is an internal roundabout within the site which is located in close proximity to the Tesco petrol station that also provides access to a Tesco Extra Foodstore. Continuing straight on at the internal roundabout allows access to a drive thru Burger King restaurant, A B & M store, a Jollyes pet store and a Wickes DIY Centre. The proposed location of the Costa Coffee drive thru is at the far end of the car park in the area least used by cars visiting the three retail units.

The proposed A3 unit is stated to serve hot and cold drinks and cold food mainly with the hot food being paninis and a small range of baked or re-heated products within a unit that is approximately 168 sq m in size internally.

The proposed operating hours are 5am to 11pm Monday to Sunday and staff are stated to arrive 30 minutes before opening and leave 30 minutes post closing to clean. The information provided states that there will be 6 full time staff and 9 part time staff, the equivalent full time staff would number 8.

Parking

WCBC Local Planning Guidance Note No 16 states that for A3 uses the provision of 1 car parking space per 4 sq m of public floor area should be provided and 1 cycle parking space per 40 sq m of public floor area. It is unclear from the floorspace figure provided if this is the overall floorspace for the unit or the public floor area and the applicant is asked to clarify this in order to determine the required car parking and cycle parking for the unit. Should the 168 sq m be the public floor area. Then 42 car parking spaces are required by the standards and 4 cycle parking spaces. Some secure long stay cycle parking spaces should be provided for staff in a secure lockable compound.

As a result of the proposals there will be a loss of 31 car parking spaces within the existing car park, a reduction down from 252 spaces to 221 car parking spaces.

The submission does indicate the delivery of 2 new accessible parking spaces at the site frontage.

The submitted Transport Statement detailed that a car parking survey was carried out between Monday 10th July and Sunday the 16th July 2023, which was not within the school holidays. The survey detailed the number of existing parking stress within the car park (max of 54% full on a Saturday) and the spaces filled approximately 136 filled, midweek it was lower.

The applicant has used this as a basis to forecast what things would look like post development, it is stated that on a Saturday the parking stress would increase to 63% full) and it states that the number of spare parking spaces would be 85. However, 63% full from 221 spaces is 139 spaces, or 221 – 85 spaces is 136 spaces, could the applicant update the statistics to confirm which is correct. However, it is considered that there would be some available space within the car park for users of the Costa Coffee unit.

Deliveries and Servicing

In terms of deliveries and waste, the applicant has confirmed that there would be 3 food deliveries a week for 20 minutes duration each time, 5 milk deliveries a week for 20 minutes duration each time and a consumable delivery once a fortnight for 30 minutes duration each time. The milk deliveries are stated to be in a 3.5t van but no detail has been provided in relation to the other delivery vans, can this be clarified.

The waste truck is stated to visit once or twice a week and a collection of recycling twice per week also using a 26t vehicle. No swept paths have been provided to demonstrate the servicing, although the submitted Transport Statement does state that vehicles will circle around the wider site to ensure they exit the site in forward gear.

The submitted information states that the servicing will be undertaken at the quieter times of day. It is recommended that this is detailed and controlled via the mechanism of a Servicing Management Plan.

The site layout plan submitted indicates the delivery vehicle parking behind the accessible spaces and the LHA doesn't see this as acceptable, even if the spaces were coned out, it's important to provide accessible spaces within the vicinity of the site. Furthermore the location of the accessible parking spaces, cycle parking spaces and the delivery vehicle would block visibility for vehicles exiting the drive thru lane which is not acceptable on safety grounds.

Trip Generation

The submitted Transportation Statement (TS) provides information about the proposed trips to the site using the TRICS system to extrapolate data for drive through coffee shops in an edge of town centre and suburban location with GFA of 140 – 305 sq m. One of the 6 surveys used was likely to be affected by covid-19 which could have an impact, the sites selected seem to be from 2020, 2021 and 2022

The data is stated to reduced by 50% to take into account the linked trips (where users visit another shop or use in the vicinity of the site) whilst the LHA doesn't dispute this is highly likely, the LHA would question if a 50% reduction would be robust. The applicant states in the TS that this is widely accepted by Local Authorities, but can evidence be provided of similar sites to justify this further.

The trip generation supplied to the end described above indicates that in the peak hours 8-9am there would be a maximum of 14 arrivals and 12 departures, and even less in the 5-6pm peak. The proposed peak of the use is stated to be between 9am and 10am where 17 arrivals and 16 departures are proposed. Furthermore, the applicant states further that using the now rescinded Department For Transports 'Guidance On TA' which suggests an increase of 30 2-way trips is a useful point of reference regarding traffic impact at junctions, implying that any increase in trips less

than this figure is unlikely to cause a detrimental impact. As a result no highway or junction assessments have been undertaken as part of the submission. It is however, accepted that the likely trip generation from this proposal is likely to be fairly imperceptible on the existing busy junctions in the vicinity of the site.

Active Travel

The closest bus stop is near to the Tesco Extra Store.

The applicant has made reference the CIHT's Providing for journeys on foot rather than Active Travel Act Guidance for Wales.

A dedicated pedestrian path is shown into the site, with zebra crossing markings linking between an kerbed area. However, the LHA is concerned that the proposed car parking spaces restrict visibility from the proposed pedestrian crossing and to pedestrians on the crossing which could compromise pedestrian safety.

Secure long stay cycle parking spaces for staff should be provided. The Sheffield stands proposed are acceptable for short stay cycle parking provision but should be provided closer to the entrance in a location with more natural surveillance.

Site Layout

The TS has discussed stacking space for the drive thru lane and states that the client has advised that it is typical for there to be 3-4 vehicles queueing on the drive thru lane at peak periods. The TS states that the drive thru lane can accommodate 7 vehicles, however, there is concern that a 5 vehicle queue from the order point could potentially block back onto the access road. No evidence or surveys have been undertaken to clarify what the likelihood of queues in the peaks at the site are likely to be.

The LHA is concerned that there is restricted visibility from the drive thru exit point, the siting of the cycle parking spaces, accessible parking spaces and delivery vehicles would all block visibility from the drive thru exit which isn't acceptable on highway safety grounds. Whilst the car park is not adopted highway it is anticipated that visibility for a 20mph road would be most appropriate and therefore the applicant is requested to demonstrate 2.4m x 25m along the site frontage towards the entrance to Border Retail Park.

Construction Phase

The LHA recommends the provision of a Construction Traffic Management Plan which should include parking for construction staff, deliveries and temporary traffic management.

In its current form the proposals are not acceptable on highway safety grounds.



On behalf of Chief Officer, Environment & Technical