MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO::	Sharon Holman
Our Ref:	ET/DC/MZ/P/2024/1174 (Res 2)	**Your Ref:**	P/2024/1174
Date:	09/10/2024		

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 12/09/2024 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. The applicant has clarified the floorspace figure for public floor area as 100 sq m which would require the provision of 25 car parking spaces as per LPG16 and 3 cycle parking spaces. 10% of the car parking spaces should be provided as mobility spaces with a minimum width of 3.6m. 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 32 car parking spaces within the existing car park, a reduction down from 252 spaces to 220 car parking spaces including 17 accessible 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 62% full and it states that the number of spare parking spaces would be 84. 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, refuse collections are within a 9.6m length vehicle and main deliveries are within a 18t rigid vehicle of approximately 11.123m length.

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. Swept paths have been provided to demonstrate the largest vehicle circulating around the site car park successfully 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 on the building frontage, and concern remains that the location of this delivery vehicle (albeit at off-peak times) restricts visibility of the realigned pedestrian path. The LHA doesn't see this as acceptable, even if the spaces were coned out, it's important to ensure views of crossing pedestrians are not impeded. The LHA would recommend that the parking spaces adjacent to the exit of the drive through lane (immediately to the north west) could be coned out and house the vehicle as it services and that this should be detailed within the service management strategy which has yet to be provided by the applicant.

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 questioned if a 50% reduction would be robust. The applicant states in the TS that this is widely accepted by Local Authorities, but evidence was requested of similar sites to justify this further.

The applicants transport consultant have undertaken further work which has removed the survey affected by Covid-19 which has left just 3 comparable sites in the TRICS database. They have also stated that Costa have a report of their own from 2016 which states that 90% of sites have diverted or pass-by trips rather than generating new trips and as a robust test they have reduced this down by 70% in their analysis.

The trip generation supplied on this basis indicates that the peak hour of use would be between 9am and 10am outside the highway network peak hours, where there would be 29 trips to and from the site, on average 1 every 2 minutes.

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 a kerbed area. This has been realigned and subject to the acceptable provision of dropped kerbs and tactile paving is acceptable in principle. The delivery vehicle location would potentially impede visibility of the proposed crossing facility and therefore the applicant is requested to amend the servicing arrangements as detailed above.

Secure long stay cycle parking spaces for staff has been provided, two secure metal cycle shelters are proposed to the rear of the bin/plant area which is acceptable. The Sheffield stands proposed are acceptable in principle for short stay cycle parking provision but should be provided closer to the entrance in a location with more natural surveillance, visibility is blocked by a solid wall in the building.

Site Layout

The transport submissions have 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. Whilst it is acknowledged that this is a standard format and layout for Costa Coffee, concern remains that blocking back of the access road could impede the public highway.

The LHA would request the applicant provides survey data of the Plas Coch Costa site within their peak times detailing how many vehicles were witnessed queing throughout the hour. Otherwise, the the LHA would request the order point is moved forward to ensure 5 clear spaces are provided or finally that the applicant could consider closing the vehicular entrance to Border Retail Park to incoming vehicles closest to the drive-thru to ensure no vehicles would block back onto the access road.

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, further clarification is required.



On behalf of Chief Officer, Environment & Technical