Ellie Jones

From: Paul Bevan | Cycling UK <paul.bevan@cyclinguk.goassemble.com>
Sent: 25 October 2024 15:02
To: planning
Subject: Planning application P/2024/1387 (BETHANIA ROAD, ACREFAIR, WREXHAM).

Planning application P/2024/1387 (BETHANIA ROAD, ACREFAIR, WREXHAM).

Dear Mr Atkinson,

I write in reference to planning application P/2024/1387 (BETHANIA ROAD, ACREFAIR, WREXHAM).

As noted in the application, the location is one which has the potential to support increased modal shift through greater Active Travel, particularly for shorter journeys, and the proposal for 33 smaller/more affordable homes is likely to result in an higher requirement for Active Travel, particularly cycling, using existing and planned routes linking to places of education, leisure, employment, and to broader public transport networks. My comments relate to the need for an increased consideration of Active Travel infrastructure and provision in the proposal. In particular:

Whilst the application recognises the potential for Active Travel and the need within planning guidance to support modal shift, the design does not appear to be deliver benefits to the Active Travel Infrastructure that are required by the Wrexham LDP and Planning Policy Wales 12. In particular, the design of the entrance way does not support the planned Wrexham Active Travel Network route Wrex-Cefn-SUP0012 which runs along Bethania Road. This should be redesigned to reflect Active Travel Act Statutory Guidance to enable the planned shared use path to run continuously along the front of the estate.

The Wrexham LDP identifies that the costs of Active Travel infrastructure may be levied against developments such as these, and therefore the council may wish to consider whether the developer could support the delivery of the Wrex-Cefn-SUP0012 route.

Whilst the addition of a link to Footpath 71 in the Highways Technical Note is a valuable addition for walking, this should be expanded to improve Footpath 71 to become a viable shared use (Walking, Wheeling and Cycling) active travel path. This will provide direct connectivity to Llangollen Road and the planned Wrexham Active Travel Network route Wrex-Cefn-SUP0010. It is crucial that this path is implemented without any barriers to prevent access and in line with the Active Travel Act Statutory Guidance which and the Disability Discrimination Act, allowing the 'Cycle Design Vehicle' to transit safely.

The provision of secure cycle parking for each dwelling is welcomed and I would encourage the council to make the stated commitment in the Transport Statement (section 3.1.3) to "secure cycle storage facilities within the site, the type and location to be agreed with the LPA" a condition of the planning permission if granted.

Addressing these elements would ensure the application is compliant with both Wrexham and Welsh Government planning policies in particular:

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)

SO5 (including Providing new homes in sustainable locations to support a growing economy and population)

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

DM1: (Development proposals, where relevant, must: [...] Prioritise walking, cycling and public transport use ahead of travel by car)

Policy T1 (Development should in the first instance be accessible by walking and cycling, then by public transport and finally by private motor car)

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 requiring the applicant to:

Redesign the entrance to the site in line with Active Travel Act Statutory Guidance, in particular to ensure continuity of the proposed Shared Use Path Wrex-Cefn-SUP0012 or the delivery of that Active Travel Network route.

Upgrade Footpath 71 and the link in to the site in line with Active Travel Act Statutory Guidance to be a suitable shared or segregated path available for Walking, Wheeling and Cycling - without any access control barriers.

Comply with their commitment to “secure cycle storage facilities within the site, the type and location to be agreed with the LPA” through making this a condition of the planning permission if granted.

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.