

MEMORANDUM

From:	Chief Officer, Environment & Technical	To:	Chief Officer Planning & Regulatory
Our Ref:	ET/DC/MZ/P/2023/0593 (Rev 1)	FAO:	Sharon Holman
		Your Ref:	P/2023/0593
Date:	8 July 2024		

Land At Lower Berse Farm, Bersham, LL14 4HP.

Outline application seeking planning permission for the erection of 1520 dwellings plus associated roads, open space, community facilities, a site for a primary school and a wastewater treatment plant (if necessary) (all matters reserved except access).

This note has been prepared in response to additional information submitted to Wrexham Council for application ref: P/2023/0593 Land at Lower Berse Farm. Wrexham Council Highways has responded to the application in the note dated 7th December 2023 in which additional information and clarifications were requested. Subsequent to the response note the following information has been received and meetings held with the applicant and their transport consultants SCP:

9 th January 2024:	Meeting with SCP
19 February 2024:	Updated Transport Assessment received.
20 th February 2024:	Junction model files received.
29 th February 2024:	Meeting with SCP
5 th March 2024:	Email from SCP on Trip Rates, Queue analysis and Traffic Flow

This note provides a review of the additional information received.

Updated Transport Assessment: Dated February 2024

The applicant has not provided a summary of the changes included in the revised Transport Assessment (TA) compared with the original submitted as was specifically requested in our February meeting. The document comprises around 60 pages of text and 335 pages of appendices.

The main changes noted in the TA include:

- Revised trip rates: based on traffic survey information of residential development on Croesnewydd Road.
- Updated junction capacity analysis based on revised trip rates.
- Assessment year at the end of the Local Plan period (2028) for all junction capacity assessment except for Junction 4 of the A483 which is 2040 (expected completion year of the development 2040). No explanation has been provided as to the reason for this.

The updated TA does not address many of the issues identified in the Wrexham Council response dated 7th December 2023 and discussed in the subsequent meeting in January 2024. Some of these are fundamental to the assessment such as a multi modal trip generation approach and the provision of a tangible public transport and active travel strategy with associated infrastructure to ensure that sustainable travel is a realistic choice for future residents of the site.

Trip Rates

The trip generation analysis presented in the revised TA is superseded by the rates included in the email of March 5th. This is the third set of trip rates the applicant has proposed:

- Original TA: Trip rates SCP state had been previously accepted for Local Plan assessment.
- Revised TA: Trip rates based on traffic surveys of residential developments at Croesnewydd Road. The sites surveyed comprise of 31% apartments and 69% houses. The resulting vehicular trip rates are around 35% lower than those originally proposed in the TA.
- Email March 5th: Vehicular trip rates SCP proposed based on TRICS database. Vehicular trip rates are around 25% lower than those originally proposed in the TA.

The rationale the applicant has put forwards to update the trip rates proposed in the revised TA with those of the email of 5th March is to better reflect the likely housing mix which the applicant states is not yet fixed but proposes a working assumption of 10% apartments and 90% houses. The resulting trip generation is proposed as a 'combined' trip rate which would be used as a generic trip rate for housing regardless of type house or apartment. The applicant states that the proposed trip rates represent a 'baseline' and do not take account of any measures which may be proposed in future to encourage modal shift.

Within the body of the spreadsheet multi modal trip rates are provided with the analysis summary within the document focussing on vehicular trips.

Comments on trip generation as follows:

- Wrexham Council has previously requested that the applicant should undertake a person trip generation assessment in TRICS using sites with similar accessibility, location type and scale to that proposed and using a modal split from local evidence. It is noted that the census data the applicant has provided for the local area in the revised TA shows an average mode share of around 65% for cars (with 10% car share).
- Within the TRICS information provided for car mode (included within the TRICS data which the applicant has provided) 'privately owned houses' equates to around 55% - somewhat lower than the local census mode.
- A very narrow site selection of three sites for houses use and three for apartments has been provided by the applicant. Although justification for the inclusion of these three sites is provided no justification for the narrow selection is given. There are over 100 sites available in the TRICS database for 'privately owned dwellings' within 'edge of town' sites surveyed since 2015 many of which will have the same reasons for inclusion as provided by SCP for the sites selected. Clear justification for site selection parameters and the reasoning for only including three sites in the sites in each residential use should be provided.
- It is noted that the Wrexham site included in the site selection was surveyed in 2001, outside the 8-year timeframe typically allowed for in TRICS. It's also noted that the Stafford survey is from April 2021 when some Covid restrictions were still in place.
- Given that the working assumption for the trip generation analysis is 10% flats we consider that this does not justify adjustment of residential trip rates from 'privately

owned houses'. The TRICS 'Land Use Definitions' states that sites within this category may include sites where up to 75% of the dwellings are houses. Accordingly, we consider that the adjustment is not required if using TRICS to establish trip rates. To provide a robust assessment, as the mix of dwelling types is not specified by the developer, the 'privately owned dwellings' use should be used if TRICS is to be used to identify trip generation.

- The trip rate calculations do not appear to take account of the method detailed in Chapter 8 of the 'TRICS Good Practice Guide' for calculating trip rates using multiple sites. Although it is acceptable for the applicant to undertake the TRICS calculations manually should they wish we consider that it should be undertaken in the same way as TRICS recommends. Although this makes only a minor difference for the residential trip rates proposed it is recommended that going forward this methodology is used as this could impact significantly on trip rates calculated for other modes or revised vehicle trip rates. This comment is made specifically to the average trip rates calculated for houses and apartments individually before they are combined to a single 'residential' rate.

As set out in the previous responses, the applicant should calculate a person trip rate using TRICS using sites with similar accessibility, location type and scale to that proposed. The applicant has undertaken this exercise but with a very limited range of TRICS sites. The applicant should seek to expand this data range or provide robust justification why the limited range is appropriate. The applicant should use the 'privately owned house' land category for residential use to provide a robust assessment. The applicant should use the Wrexham Census data to determine the mode split.

Updated Junction Capacity Analysis in TA

The applicant has provided junction models for review along with junction capacity assessments. These are currently being checked and will be subject to a separate technical response.

Comment on impact of the development in traffic terms and mitigation will only be possible once trip generation has been agreed and models have been checked.

It is noted that the original TA provided assessment of the year 2028 with full development in place. The revised TA provides assessment of the year 2040 for A483 Junction 4 only. The applicant should provide details of likely phasing of development. If a completion year of 2040 is proposed the applicant should provide assessment of impact in that timeframe on all the network, not solely Junction 4.

By providing assessment of immediate years due to phasing it may be possible to determine when particular mitigation schemes are necessary.

It is noted that the improvements proposed in the revised TA differ from those in the original TA in terms of the proposed mitigation scheme at A483 Junction 4. The mitigation scheme is more limited in scope at this location in its revised form.

Western Gateway:

The developer needs to consider further development on this allocated site to provide a robust assessment.

Conclusion

The Applicant should provide the additional information and respond as requested above so the impact of the development on the network can be clearly determined. This starts with our agreeing multi-modal trip rates. Should it be required Wrexham Council Highways is happy to meet with the Applicants transport consultant to discuss the points made in this note.

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

Chief Officer, Environment & Technical