

S|C|P

APPENDIX A



Llywodraeth Cymru
Welsh Government

Development Control
Wrexham County Borough Council
16 Lord Street
Wrexham
LL11 1LG

Eich cyf / Your ref P/2023 /0593

Ein cyf / Our ref 23/NM-5991

11 October 2023

Dear Sir/Madam,

**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES)
ORDER 2012:**

**LAND AT LOWER BERSE FARM BERSHAM WREXHAM
OUTLINE APPLICATION FOR ERECTION OF 1520 DWELLINGS (APPEARANCE, LANDSCAPING,
LAYOUT AND SCALE RESERVED) PROVISION OF LAND FOR A PRIMARY SCHOOL AND A
WASTE WATER TREATMENT PLANT**

I refer to your consultation of 21st September 2023 regarding the above application, and advise that the Welsh Government as highway authority for the A483 trunk road directs that planning permission is not granted at this time as the applicant has provided insufficient information to determine the application.

The applicant must provide the following information to support this application or resubmit the application with the following details;



Traffic Growth Figures

1) The applicant should specify which version of the National Transport Model has been used to inform the calculation of traffic growth factors. This is required in order to confirm the acceptability of the background traffic growth estimates used.

Committed Development

2) The Brymbo Park and Stansty Chain Road developments do not have planning permission and as such would not normally be included as committed development. The traffic growth estimates should be repeated with these sites excluded. A sensitivity test including these developments may also be useful in assessing the potential cumulative impact of developments.

3) The applicant should also clarify why Western Gateway Employment Site has been included as committed development as the development appears to have been built.

Trip Generation

4) The applicant should include the expected trips generated from outside of the development by the school (i.e. teachers living outside of the development etc.). In addition to staff trips, advice should be taken from WCBC on the likely number of pupil trips from west of the A483.

Trip Distribution

5) The applicant must provide the justification for the choice of using the 011 MSOA and for using 2011 data, instead of the more recent data from the 2021 census.

Transport Implementation Strategy

6) It was observed that the mode split targets set in the TIS could be more ambitious and these could be strengthened as a more detailed Travel Plan is developed. This could reduce the impact to the operation of Jct 4 of the A483.

Assessment Years

7) Junction assessments have been undertaken for 2028; the end of the current local plan period. It is highly unlikely that the development will be complete by 2028 and as such assessments should also be provided for the expected completion year.

A483 Junction 3

8) Given the location of the development site and access points on to Bersham Road, a portion of the traffic generated by the development may be expected to travel through A483 Junction 3. In addition, increased congestion at Junction 4 may displace traffic on to Junction 3. The applicant is advised to provide justification for not including Junction 3 in the assessment or include A483 Junction 3 in the traffic assessment before the TA is resubmitted for consideration.



Review of Linsig Modelling A483 Junction 4 and A525 Ruthin Road/Croesnewydd Road/Site Access

9) The following issues have been observed in the Linsig model, therefore the applicant is advised to consider making the amendments proposed or provide justification for retaining the original proposals prior to resubmitting.

A525 Eastbound

9.1) In the proposed layout Linsig model, the left turn lane and movement has been omitted from the model as the lane is unsignalised and operates free flow, which is considered appropriate. However, the approach is coded as 2 long lanes both of which feed into the ahead movement, effectively providing additional capacity for the ahead movement. The Welsh Government believe the approach should be coded as a long lane with a short lane to the right to better reflect the proposed junction layout.

A525 Westbound

9.2) In the proposed layout Linsig model, the short left-turn lane is modelled as a long lane. The Welsh Government believe Lane 1 should be coded as a short lane which is considered a more appropriate representation of the proposed junction layout.

A483 Southbound off-slip

9.3) The proposed junction layout Linsig model provides a reasonable representation of the proposed intervention scheme. However, there is the potential for Linsig to overestimate the benefits of the use of an extended left turn lane which merges back to a single lane shortly after the stop line. Linsig will fully utilise the lane for queueing/discharging traffic flows, but in reality, there is the potential for the lane to be underutilised as drivers avoid needing to merge shortly after the junction exit and queue in a single lane.

The issue described above is considered particularly likely given the relatively short length of 2 lanes before traffic must merge, without any central reserve or protection from oncoming traffic.

Queues at the stop lines in the middle of the junction extend beyond the space available for stacking queueing vehicles. Better coordination of the signal timings or shorter cycle times may help to manage this. The results on the approaches to the junction are not representative as the queues are staked in the middle of the junction masking/reducing the impacts on other approaches.

Queuing of vehicles making the ahead movement on the eastbound approach to the junction in the morning peak is likely to block access to the left turn free flow lane, which will be stuck in the same queue as the ahead traffic further exasperating queue lengths and delays for traffic which is not included in the model.

A525 Ruthin Road / Croesnewydd Road / Site Access Signal Junction

9.4) The existing layout of Croesnewydd Road is a single lane. The proposed layout drawing does not indicate alterations are proposed to the Croesnewydd Road approach. However, the proposed



junction layout Linsig model includes 3 lanes; a short left turn lane, a long ahead + right lane and a long right turn lane. This is a significant overestimation of capacity for the Croesnewydd Road approach when compared to the existing and proposed junction layout.

In addition, Lane 3 (right turn to A525 westbound) should give-way to opposing traffic emerging from the site access, which green phase runs in the same stage as Croesnewydd Road. The model network layout diagram appears to indicate Lane 2/3 does not give way to opposing traffic.

9.5) The proposed junction layout drawing indicates the eastbound left turn lane on approach to the junction will be extended to 80m from the stopline. The proposed junction layout Linsig model has been coded as 2 long lanes, which is not considered appropriate, thus the Welsh Government believe this should be coded as a long lane for ahead movements with an 80m short lane on the left for left turn movements.

This overestimation of capacity is on the arm leading from A483 / A525 junction. Reducing capacity of the approach in the model has the potential to have knock on effect to queues and delays at the junction in particular on this arm during the morning peak period which is shown as approaching capacity in the results provided in the TA.

Queue results on the A525 approach to the junction extend beyond the space available for stacking queueing vehicles. The proposed layout indicates a lane extends 80 metres from the stop line which is suitable for catering for approximately 13 PCUs. The results indicate average queues in excess of 20 PCUs which are likely to fluctuate throughout the peak period so could extend even further.

This issue is of particular concern as this approach leads from the A483 / A525 junction and issues on this approach could lead to queues blocking back to the main junction causing knock on issues for queues and delays.

Heavy goods vehicle percentages

10) Heavy goods vehicle percentages are set to zero. PCUs have been calculated which is appropriate however, inputting HGV % has an effect on the capacity of each movement. It is likely there will be a high proportion of HGVs in the area due to the strategic A-road nature of the surrounding network. This is particularly concerning given the junction already operates over capacity in the morning peak, on the arm which leads from the A483 / A525 junction.

If you have any further queries, please forward to the following Welsh Government Mailbox
NorthandMidWalesDevelopmentControlMailbox@gov.wales

Yours faithfully,

Helen Lewis



BUDDSODDWR MEWN POB
INVESTOR IN PEOPLE

Sam Mynach
Cyfford Llandudno
LL31 9RZ

Sam Mynach
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LL31 9RZ

Best Email: NorthandMidWalesDevelopmentControlMailbox@gov.wales

MEMORANDUM

From:	Chief Officer, Environment & Technical	To:	Chief Officer Economy & Planning
Our Ref:	ET/DC/MM/DB/P/2023/0593	FAO:	Matthew Phillips
Date:	7 th December 2023	Your Ref:	P/2023/0593

Land At, Lower Berse Farm, Bersham, Wrexham, 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).

Further to the planning submission validated on 4th September 2023 in respect of the above, we comment as follows (please note the comments pertain to the Transport Assessment document '210187 Wrexham Transport Assessment_17.08.23 uploaded to the Wrexham Planning Portal 19th September 2023):

The outline application (P/2023/0593) is for the erection of 1,520 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). The scale of the proposed primary school and community facilities is not specified in the Transport Assessment (TA).

Planning Policy

The current adopted development plan is the Wrexham Unitary Development Plan (UDP), 1996 and 2011, its general policies remain in place. Development is not anticipated at the site within current local planning policy.

The site is identified for development within the emerging Wrexham Local Development Plan 2013-2018, which remains unadopted at the time of this review. The site is designated for development as 'Key Strategic Site 1' for 1,500 dwellings. The Draft Plan notes however that the capacity of A483 Junction 4 is a significant constraint requiring infrastructure improvement. The Draft plan states that 400 units could be delivered on the site following completion of works to Junction 4. (Previously 200 units?) The remainder of housing on the site is anticipated for a future plan period beyond 2028.

Transport Implementation Strategy (TIS)

A TIS is provided which sets indicative mode share targets for future residents of the development site. The developer proposes to undertake travel surveys at 30% occupation of the site to monitor travel behaviour and employ / fund Travel Plan Co-Ordinators (TPCs) to implement sustainable transport measures to ensure modal split targets are met. The measures specified are focussed on raising awareness of public transport and cycle routes and publicising lift share services. Monitoring is proposed to take place for 5 years. The developer suggests these measures may be secured via a planning condition.

The provision of new sustainable travel infrastructure does not form part of the TIS.

Access

Site access is proposed as follows:

- The A525 Ruthin Road / A5152 signalised T-junction will be upgraded to provide a 4-arm signalised crossroads with the proposed site access forming the southern arm.
- A priority ghost island junction with A525 Ruthin Road around 60m east of the junction with Berse Lane (which will be closed to traffic as part of proposals). The junction has the ability to be upgraded to a four-arm roundabout as part of the Western Gateway scheme.
- A priority T-junction along Bersham Road, approximately 450m to the west of the existing junction with Homestead Lane.
- A priority T-junction will be provided along Bersham Road, approximately 190m to the west of the junction with Homestead Lane.
- The 30mph traffic speed limit along the A525 Ruthin Road will be extended approximately 445m to the west of the existing location. The entirety of Berse Lane will also be reduced from 50mph to 30mph. All proposed accesses will therefore be along a road with a mandatory speed limit of 30mph.

The following active travel measures are proposed.

- Shared footways/cycleways along the site's frontage to the A525 Ruthin Road and to Bersham Road. Footway widening will be provided at the Bersham Road / Homestead Lane junction and a pedestrian crossing including dropped kerbs and tactile paving at the western arm of the junction.

It is recommended that before the proposed highway changes can be accepted a Stage 1 Road Safety Audit and WCHAR (Walking, Cycling and Horse-Riding Assessment & Review) is required in addition to the receipt of swept path analysis drawings demonstrating that the designs are acceptable. The design should be in accordance with Wrexham Council design standards. Shared use paths should be 3m minimum width. The Applicant should liaise with Wrexham Council's Active Travel officer to discuss and agree active travel measures. Highway works will be secured by Section 278.

Parking

As the application is in outline no details on parking are provided, the Applicant states these will be developed in accordance with WCBC's standards, LPGN16e.

Public Transport

The site is not well served by public transport. The nearest bus stops on Croesnewydd Road are served by only 3 services per day. The next closest stops are located around 1km from the site on the A5152.

Wrexham train station is located around 2km away, which would be outside of a reasonable walking distance for some (around 25 minutes) although the station is within a reasonable cycle distance.

For a development of this scale it is a concern that there is no public transport strategy provided with the application. It is strongly recommended that the Applicant liaise with Wrexham's Active Transport Lead Officer, Gwen Thomas and subsequently develop a strategy containing tangible measures, both in design and provision of a commuted sum, which will improve access to public transport for future residents to make this a realistic mode choice for everyday journeys.

Active Travel

The Applicant has provided isochrone plans to demonstrate journey distances by walking and cycling from the site. There is no analysis of the available pedestrian and cycle infrastructure in the vicinity of the site to achieve these journeys in a safe manner. Nor how the proposed pedestrian facilities at the site access junctions conveniently connect to any existing facilities. Improvement of active travel routes beyond the site boundary to link to schools and retail/commercial facilities in the town.

For example, there is an existing pedestrian footway cycleway to the north of the site on Ruthin Road. There is no footway on the southern side as existing. The Applicant only proposes a new footway along the site frontage, there is no connection proposed on the southern side eastwards at Homestead Lane and crossing facilities there. There are no footways currently on Berse Lane, the Applicant proposes a new footway for a short distance along it on one side despite it appearing that dwelling frontages will be provided along almost its entire length. At Bersham Road there is only a narrow footway existing on the southern side and no provision on the northern side, a new footway is proposed by the developer on the northern side.

The Welsh government published Active Travel Maps (<https://datamap.gov.wales/maps/active-travel-network-maps/>) indicate that there is a network of proposed footway / cycleways in the vicinity of the site.

The Applicant should liaise with the Wrexham Active travel team and develop an active travel strategy for the site which can demonstrate how the development will connect into existing / improved infrastructure for convenient and safe active travel. The contact for this is Gwen Thomas available at gwen.thomas@wrexham.gov.uk

The Applicant should liaise with Wrexham's Street Lighting Team with regards to implementing street lighting required for the safety of pedestrians & cyclists.

Public Rights of Way

A number of Public Rights of way and a public bridleway cross the site. The routes of these are maintained via a network of mainly off street cycleways and footways. The Applicant should liaise with the Wrexham PRow officer on requirements for maintaining these routes.

Modelling

It is noted that the application will result in development traffic routing onto the A483 through Junction 4. It is likely that NMWTRA will review and comment on the planning application as managers of the Welsh Government's strategic Road Network. It is recommended that a joint meeting is held between Wrexham (as Highway Authority), NMWTRA (as Trunk Road Agent) and the Applicant to co-ordinate efforts to determine the impact of the development on both the trunk road and local road network. Agreement of common assessment parameters and methodologies, if possible, between all parties could assist in a more efficient process for all involved.

Modelled area.

The Applicant has undertaken turning count and queue traffic surveys at the following locations in November 2022:

- A525 Ruthin Road / Croesnewydd Road Signal Junction;
- A525 Ruthin Road / Berse Lane Priority Junction;
- Bersham Road / Berse Lane Priority Junction;
- B5098 / Vicarage Hill Priority Junction;
- A5152 Ruabon Road / A525 Ruthin Road Priority Junction;
- A525 Ruthin Road / A5152 Signalised Crossroads;

- Croesnewydd Road / Rhyd Broughton Lane / Wrexham Maelor Hospital Access Priority Roundabout;
- Berse Road / Rhyd Broughton Lane Priority Roundabout;
- A525 Ruthin Road / Heritage Way Priority Junction; and
- Junction 4 of the A483.

Assessment Year & Committed Development

A single assessment year of the 2028 (end of local plan period) is provided when it is stated that the development would be completed. The Applicant uses NTM and Temprow to account for growth which is acceptable. In addition to this the Applicant takes account of the following committed developments:

- 112 dwellings along Gatewen Road (LPA Ref: P/2021/0955);
- 70 dwellings along Heritage Way (LPA Ref: PP/2021/0255);
- 189 dwellings along Main Road (LPA Ref: 2021/0135);
- 455 dwellings along Chain Road (LPA Ref: P/2019/0923) – application pending;
- 450 dwellings at Brymbo Park (LPA Ref: P/2019/0546) – appeal pending.
- Western Gateway Employment Site (LPA Ref: P/2014/0665).

Consultation with Wrexham Planning has highlighted the Applicant should also consider the following sites as committed development:

- 90 dwellings at Plas Coch (LPA Ref: P/2021/0094) and;
- Wrexham Stadium (LPA Ref: P/2022/0725)

Trip Rates

The Applicant states that the residential vehicle trip rates proposed are sourced from ‘the Council’s Consultant report’. We are at present unaware of what report this refers to. The vehicular trip rates the Applicant has provided are substantially lower than for other similar developments in Wrexham. The Applicant should undertake a person trip generation assessment in TRICs using sites with similar accessibility, location and scale to that proposed and using a modal split from local evidence. For an application of this scale typically a multi modal trip generation assessment would be provided with evidence of how the trips can be accommodated on each mode. Such evidence has not been provided by the Applicant.

A local centre is proposed within the development site with frontage along Ruthin Road. The floor area of this is not specified. The planning statement which accompanies the application states that the local centre due to its location is intended also to serve those living and working outside the development site as well as those within it. However, the mix of uses proposed at present is not known but would likely include shops, community facilities and a public house. We consider it likely therefore that the local centre would attract trips from outside the development site itself. The Applicant should take account of this in the trip generation, distribution and modelling assessment.

A primary school is proposed to the east of the site intended to serve local residents. It is accepted that trips to this would largely be internal. However staff and servicing traffic from beyond the development should be considered.

Trip Distribution

Trip distribution has been undertaken using 2011 Census 'Travel to 'Work' Data. The 2021 Census was undertaken during Covid travel restrictions and therefore 2011 is accepted.

The internal road network and new site accesses will cause a redistribution of existing traffic. Two new north – south road connections will be provided between Ruthin Road and Bersham Road. The applicant has accounted for this by redistributing all existing traffic on Berse Road to the new road network. This is accepted, notwithstanding this however there will be through traffic on Homestead Lane which may also divert to the new network and consideration of these should be made by the applicant.

Ideally a traffic model capable of assignment should be used by the Applicant to identify traffic redistribution patterns. The Applicant should provide details of the routing assumptions provided for the Census distribution methodology.

Highway Impact- Model Results

It is recommended that the Applicant issue the models used in this assessment for review along with plans showing the geometries and dimensions inputted into the models. The commentary below is based upon the model results and interpretation as provided in the Transport Assessment and is not our interpretation of the results.

No	Junction	Comment
1	Proposed Signalised A525 Ruthin Road / Croesnewydd Road / Site Access	Junction operates within capacity with proposed development in place
2.1	Proposed North-Western Accesses along the A525 Ruthin Road. Roundabout Option 1	Junction operates within capacity with proposed development in place
2.2	Proposed North-Western Accesses along the A525 Ruthin Road. T Junction Option 2	Junction operates within capacity with proposed development in place
3	Proposed Western Priority Site Access along the B5099 Bersham Road Site Access	Junction operates within capacity with proposed development in place
4	Proposed Eastern Priority Site Access along the B5099 Bersham Road	Junction operates within capacity with proposed development in place
5	B5098 / Vicarage Hill Priority Junction	Junction operates within capacity with proposed development in place
6	Bersham Road / Victoria Rd/ Hampden Road Crossroads	No modelling undertaken due to increase of 54-56 vehicles in each peak hour
8	A5152 Ruabon Road/ A525 Ruthin Road Priority Junction	Junction operates within capacity with proposed development in place
9	A525 Ruthin Road / A5152 Crossroads	Junction operates within capacity with proposed development in place
10	Croesnewydd Road / Rhyd Broughton Lane / Hospital Access Priority Roundabout	Junction operates within capacity with proposed development in place
11	B5101 Berse Road / Rhyd Broughton Lane Roundabout	Junction operates within capacity with proposed development in place
12	Junction 4 of the A483 (no mitigation)	Junction operates over its theoretical capacity with proposed development in place.
13	Junction 4 of the A483 (with mitigation)	Junction operates over its theoretical capacity with proposed development in place to a lesser extent than with no mitigation

It is noted that the Applicant has not presented any model results based on existing traffic flow. The applicant should provide model runs using surveyed traffic flows and compare with observed queued data. Without this information it is not possible to determine how well the models reflect existing traffic conditions.

It is noted that the Applicant does not provide a 2028 baseline assessment to compare with the 'with development' scenario. This information should be provided.

The following junction assessments appear to be missing from the Transport Assessment, introduced in Section 8.1 but not provided in Section 8.23 onwards. These should be provided by the Applicant;

- Ruthin Road / Berse Lane Priority Junction
- Bersham Road / Berse Lane priority junction

For the Bersham Road / Victoria Road/ Hampden Road Crossroads junction we consider that modelling should be provided. The applicant states that the development impact of 54-56 vehicles would not have an impact. The Applicant however has assessed other junctions with fewer development trips. The Applicant should provide assessment for this junction. It is noted that the junction has limited visibility with a 'stop' vehicle restriction on the Bersham Road arm.

Highway Impact- A483 Junction 4

The Applicant assesses the impact of development at A483 Junction 4 and provides a 'with mitigation' and 'without mitigation' scenario. The Applicant has not provided a plan of the proposed mitigation works to the junction.

The Applicant notes that an improvement scheme at the same location was promoted by Welsh Government in the past but is no longer proposed.

The base and with mitigation models should be provided by the Applicant for checking. A plan of the proposed mitigation works should be provided. A Stage 1 Road Safety Audit and WCHAR of the proposed scheme should be undertaken.

Summary

The following additional information and clarifications are requested from the Applicant, for more detail please review the note in its entirety:

- A Stage 1 Road Safety Audit and WCHAR (Walking, Cycling and Horse-Riding Assessment & Review) is required on all proposed highway works including A483 Junction 4 in addition to the receipt of swept path analysis drawings demonstrating that the designs are acceptable. The now cancelled junction 4 improvements and Western Gateway link road created the level and scale of junction improvements considered necessary for a scheme of this size. Without these works being implemented or any similar scheme of improvement, we struggle to understand how the existing road network will come close to accommodating development of this scale
- It is clear that at present public transport access to the site is poor. The Applicant should liaise with Wrexham's Public Transport Officer and subsequently develop a strategy

including tangible measures which will improve access to public transport for future residents to make this a realistic mode choice for everyday journeys.

- The Applicant should liaise with the Wrexham Active Travel Officer and subsequently develop an active travel strategy for the site which can demonstrate how the development will connect into existing / improved infrastructure for convenient and safe active travel.
- A number of Public Rights of way and a public bridleways cross the site. The routes of these are maintained via a network of mainly off street cycleways and footways. The Applicant should liaise with the Wrexham PRoW officer on requirements for maintaining these routes.
- It is recommended that a joint meeting is held between Wrexham (as Highway Authority), NMWTRA (as Trunk Road Agent) and the applicant to co-ordinate efforts to determine the impact of the development. Agreement of common assessment parameters and methodologies, if possible, between all parties could assist in a more efficient process for all involved. We note the WG trunk road agency's draft response
- Modelling should take account of the committed development sites cited in this note.
- The vehicular trip rates the Applicant has provided are substantially lower than for other similar developments in Wrexham. The Applicant should undertake a person trip generation assessment in TRICs using sites with similar accessibility, location and scale to that proposed and using a modal split from local evidence. A multi modal trip generation assessment would be provided with evidence of how the trips can be accommodated on each mode.
- The local centre will attract trips from outside the development site itself. The Applicant should take account of this in the trip generation, distribution and modelling assessment.
- The Applicant should provide details of the routing assumptions provided for the Census distribution methodology.
- It is recommended that the Applicant issue the models used in this assessment for review along with plans showing the geometries and dimensions inputted into the models.
- It is noted that the Applicant has not presented any model results based on existing traffic flow. The Applicant should provide model runs using surveyed traffic flows and compare with observed queued data. Without this information it is not possible to determine how well the models reflect existing traffic conditions.
- It is noted that the Applicant does not provide a 2028 baseline assessment to compare with the 'with development' scenario. This information should be provided by the Applicant.
- The following junction assessment appear to be missing from the Transport Assessment, introduced in Section 8.1 but not provided in Section 8.23 onwards. These should be provided by the Applicant;
 - Ruthin Road / Berse Lane Priority Junction
 - Bersham Road / Berse Lane priority junction
- Modeling should be provided for the Bersham Road / Victoria Rd/ Hampden Road Crossroads junction.

Conclusion

We request that planning permission **is not granted** at this time as there is a considerable amount of additional information required so the impact of the development on the network can be clearly determined.

Major concerns exist over the principles that the junction 4 improvement works shown in the Appendix below have not been proposed as part of this development. The Ruthin Rd/A483 junction and Ruthin Rd would not be able to accommodate additional traffic generated by this proposal.

The Bersham Rd B5099 is a semi rural country lane and the potential increase in the city bound traffic along this road, approaching the A5152 T junction is of concern.

It would be beneficial for Wrexham Highways to meet with the Applicant's transport consultant to discuss the points made in this note, the appraisal of a smaller number of houses, anticipated traffic flow movements, the suggested closing of Berse Lane and other queries raised recently.

A handwritten signature in dark ink, appearing to read 'R. Kelly', is positioned above the title. The signature is fluid and cursive.

Chief Officer, Environment & Technical

Junction 4 and Western Gateway improvements

Proposed Scheme for Junction 4 (Ruthin Road)

Uywddraeth Cymru
Welsh Government

