

MEMORANDUM

From:	Chief Officer, Environment & Technical	To:	Chief Officer Economy & Planning
Our Ref:	ET/DC/MM/P/2023/0497	FAO:	Gwyn Humphreys
Date:	1 st December updates	Your Ref:	P/2023/

Land North of Bryn Lane, Wrexham Industrial Estate, Wrexham.

Hybrid application seeking: Full planning permission for the erection of buildings for class. B1, B2 & B8 use and formation of vehicular access and outline planning permission for the erection of buildings for class B1, B2 and B8 use and retail, drive thru, hotel and petrol filling station classes A1, A3, C1 and sui generis and associated infrastructure (all matters reserved).

Also referred to as Utopia City

Further to the planning submission validated on 19th July 2023 in respect of the above, we comment as follows (please note the comments pertain to the revised Transport Assessment (V4) uploaded to the Wrexham Planning Portal 23rd August 2023):

The detailed element of the hybrid application (P/2023/0497) is for the erection of multiple industrial units on Wrexham Industrial Estate (B1c, B2 and B8 land use classes), with proposed Gross External Areas (GEA) of 63,254sqm. The outline element of the application is for a total of 72,635 sqm GEA of additional commercial use (B1c, B2 and B8 land use classes) on Wrexham Industrial Estate (WIE). Within the total of 135,889 sqm of development, permission is sought for up to 16,150sqm of flexible floorspace for retail, drive thru, hotel and petrol filling station classes A1, A3, C1 and sui generis inside the outline application area. The site is currently in agricultural use with a cluster of residential and agricultural buildings to the south.

Site Access and Layout

The development is proposed to be served by two main points of vehicular access: via a proposed new arm on the existing four arm Blackwood Way (Industrial Estate access road) / Bryn Lane / Ash Road North / Abenbury Way roundabout and via a new priority junction on Bryn Lane. A minor servicing access is proposed via a priority junction on Ridley Wood Road*. Pedestrian and cycle access is proposed via the two main vehicular access points as well as pedestrian access on Francis Lane and Bryn Lane connecting to an existing Public Right of Way, additionally pedestrian access is proposed via Industrial Estate Road. (* Further information on the frequency and type of use anticipated for this minor servicing access onto Ridleywood Road is required)

Site access Industrial Estate Road / Bryn Lane / Ash Road North / Adenbury Way roundabout

The Transport Assessment uses CrashMap data to demonstrate that there have been 4 collisions at the roundabout in the last 5 years. A cursory review of the information demonstrates that 3 out of the 4 accidents have involved cyclists. We recommend that the applicant undertakes a detailed review of injury collisions at the roundabout.

It is recommended that before the principal of a new arm on the roundabout 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 design is acceptable. Swept path analysis should use 18.55m long articulated HGV traffic, the largest vehicles which could reasonably be expected to use the roundabout. It is the combination of both Active Travel crossing the roundabout and significant increases in traffic flow that requires an in depth review.

Furthermore, to allow a review of the modelling of the roundabout a plan detailing the measurements used for the geometry inputs to the Junctions 9 model should be provided with the models themselves for checking. In addition, a plan showing the existing roundabout arrangement underneath the proposed amendments should be provided.

It is noted that the new layout re-provides existing uncontrolled crossings on the roundabout arms albeit with tactile paving and a new uncontrolled crossing on the new site access arm. No walking or cycling improvements are proposed on the existing network away from this. The applicant should consult with Wrexham's Active travel Officer on incorporating improved active travel provision at this location.

Site access Bryn Lane

A new junction is proposed with a ghost island right turning lane. A new uncontrolled crossing is proposed over Bryn Lane. It is noted that the speed survey information provided within the TA indicates 85%ile speed is 50mph, the existing speed limit is 40mph. No specific measures are proposed to mitigate traffic speed at this location. Consideration could be given to introducing speed limits of 30mph at congested locations or where active travel routes cross or are adjacent to the highway.

It is recommended that before the principal of the junction design can be accepted a Stage 1 Road Safety Audit is required at this location also, in addition to the receipt of swept path analysis drawings demonstrating that the design is acceptable. The analysis should use an 18.55m articulated HGV, the largest vehicle expected to use the junction as the basis of the swept path assessment. Given the high volume of HGVs which will be generated by the development and high speed of existing traffic the applicant should consider the provision of a deceleration lane and island at the junction. It would be expected that the vast majority of HGVs and other traffic would turn left into the facility and there is no provision for pedestrians to cross the new junction in an East – west direction.

Furthermore, to allow a review of the modelling of the junction plan detailing the measurements used for the geometry inputs to the junctions 9 model should be provided with the models themselves for checking. In addition, a plan showing the existing highway arrangement underneath the proposed amendments should be provided to identify the extent of highway works / widening required. The applicant should consult with Wrexham's Active travel Officer on incorporating improved active travel provision at this location.

Parking

Wrexham County Borough Council (WCBC) Local Planning Guidance note 16 (LPG16) states the maximum car parking provision and minimum cycle parking for developments.

For the detailed element of the application (63,254sqm) 592 car parking spaces and 130 cycle parking spaces are proposed. For the outline element of the application up to 908 car parking spaces are proposed and for the outline element 160 cycle parking spaces.

For the detailed element no justification for the level of car or cycle parking is provided in the TA. For the range of uses proposed (B1a, B2 and B8) different car and cycle parking standards apply.

The applicant has provided a parking accumulation assessment in table 5.2 showing a maximum parking accumulation across the entire hybrid site based on 135,889 of 'industrial estate use' which indicates a maximum accumulation of 454 spaces.

Justification for the level of car and cycle parking provision should be provided by the applicant for the detailed application site based on the range of uses which could come forwards with reference to LPG16

It is not clear from the proposals the volume of accessible parking spaces to be provided, for information LPG16 requires 10% of parking provision should be provided to mobility standard.

Internal Network

It is not known whether the internal road is intended to be adopted or whether it is proposed to be a private road. If it is intended for adoption a Stage Road 1 Safety Audit and WCHAR should be undertaken by the applicant. Swept path analysis should be provided of the internal network demonstrating the roads are navigable by HGVs travelling in opposite directions and that the turning areas within service yards are adequate. Turning heads at the end of each cul de sac to accommodate HGV's would also be required as access into private land to turn around either side of a cul de sac cannot be assumed.

The site access to Unit 2 is located approximately 60m from the Bryn Lane junction. There is a risk that queued HGVs may block the highway back to the Bryn Lane junction. Information or commentary should be provided by the applicant to demonstrate that there is adequate capacity within the unit, and provision at the entrance gate for free entry removing the risk of there being HGV queuing on the site service roads or indeed Bryn Lane, all to be based on the estimated flows.

A footpath / Public Right of Way (ISY/6 & HOL/26) runs adjacent to the east of the development site, from north to south. Another footpath (HOL/25), which can be accessed from Francis' Lane is located just to the north of the development site. The Public Right of Way on the eastern boundary of the site will be retained and improved providing linkage between Bryn Lane and Francis' Lane. It is recommended that the Wrexham Public Right of Way Officer is consulted on this proposal. Some links for a shared active travel access onto Francis Road should also be considered and are also referred to in the potential active travel improvements.

Public Transport service

Nearest bus stops are located further than 550m for most passengers (distance stated in TA). Existing bus stops located on Abbey Road one service per hour outside peak and two services per hour at peak. It is recommended that Wrexham's Public Transport Officer (Andrew Mytton) is consulted on the potential for improved bus services / infrastructure in the local area. Proposals for improvements to bus routes have been considered, and subject to finalising further information on anticipated total staffing and customer use, a commuted sum aimed at supporting the increase in additional bus routes and increased frequency until their use gains momentum will be requested, (also referred to as pump priming).

Modelling

Modelled area.

The applicant has undertaken turning count and queue traffic surveys at the following locations in March 2023:

- B5130 / Ridleywood Road Priority Junction.
- Bryn Lane / Ridleywood Road Priority Junction.
- Industrial Estate Road / Abenbury Way / Ash Road North / Bryn Lane Roundabout.
- Industrial Estate Road / A534 / Borrass Hall Lane / Sandy Lane Roundabout Junction.
- A5156 / A534 / Wrexham Golf Club Access / Stryt Holt Roundabout Junction; and
- A483 / A5156 & B5445 Chester Road / Blue Bell Lane Roundabout Junction.

It is understood surveys at these locations were agreed in scoping. **Notwithstanding this junction modelling has only been undertaken at the proposed site access roundabout and the proposed new access on Bryn Lane.**

The applicant provides a percentage impact analysis at the junctions not modelled to make a case for omission. Given the comments later in this note on trip rates, traffic distribution and committed development it is recommended that the applicant models the development impact at all junctions above. This is a consistent approach to other applications at WIE. Furthermore, assessment of impact at the A5156 / Borrass Road / Borrass Park Road should be undertaken. Traffic flow for this junction may be taken from surveys included in the Transport Assessment for application P/2023/0280 if necessary. The impact of potential additional traffic flow at The Greyhound pub roundabout at the junction of Holt Rd and Cefn Rd should also be considered. This junction is already approaching full capacity.

Assessment Period

An assessment year of 2030 has been provided by the applicant. The TA states this is the expected year of full opening of the development.

No Base 2023 assessment has been providing using surveyed data. This information is required to review current junction operation particularly at the site access roundabout. This will then allow comparison with the future baseline year and 'with development' scenarios.

A comparison of the performance of the models with observed queues should be provided to assess the ability of the models to replicate surveyed conditions.

The applicant should provide any details of phasing if known. It may be appropriate to model an intermediate year prior to full opening. **In line with other developments at WIE and on account that substantial changes are proposed to the highway network, an assessment for the year 2037 should be provided.**

Assessment Scenarios

Two assessment scenarios are provided.

- Scenario 1 assumes 100% of the development floorspaces comprises B1C, B2 & B8.
- Scenario 2 includes 6,100 of flexible floorspace in uses A1, A3, C1 and sui generis (PFS), with the remaining 10,050 of flexible floorspace being B1C, B2 & B8.

The assessment should provide analysis of potential impact should the full 16,150m² come into fruition for A1, A3, C1 use. Without such an assessment the analysis is not robust.

Trip Rates

General

TRICS has been used to calculate trip generation of the development which is acceptable.

Industrial Estate Trip Rates

A range of B1c (light industry in residential area), B2 (general industrial) and B8 (storage & distribution) uses are proposed. No information is provided in the application of the likely proportion of uses that will come forward within the 11,3889m² of development. No justification of how the industrial sites selected in TRICS reflect the range of uses proposed and in what proportion. The three use classes all have distinctly different traffic generation characteristics.

No justification has been provided in the TA of the site selection process in TRICS apart from location. A comparison assessment undertaken by MM shows that adjusting the selection criteria in terms of scale of development to better reflect that proposed results in a significantly higher rate. The sites included within the Cora selection includes a site 8 times larger than that proposed and one over ten times smaller. Full justification for all criteria used in the site selection process should be given.

At present on account of the points noted above the trip rates proposed at present cannot be accepted. The applicant should provide a 'reasonable worst case' assessment of the development using robust trip rates reflecting the highest trip generating uses proposed including the B1C, B2 and B8 uses. The applicant should review trip rates within the TRICS database for industrial and warehousing uses as well as industrial estates to provide a robust assessment.

Within the applicant's new analysis, trip rates for HGVs, all other non-HGV traffic, and a combined rate for all vehicles should be provided.

As a point of detail in the TA: trip rates for PM peak in table 5.1 don't match those for 16:30 – 17:30 in Table 5.2.

PFS Trip Rates

Trip rates are accepted.

Hotel Trip Rates

Town centre, edge of town centre and suburban sites have been selected within the database which are not reflective of the development site location. A comparison trip generation has been undertaken which generates a significantly higher trip rate. The applicant should review the trip selection parameters used.

Drive Thru Trip Rates

Trip rates are accepted.

Local Centre Trip Rates

No Trics output is available to review. Notwithstanding this a comparison trip generation has been undertaken which generates a significantly higher trip rate. The applicant should review the trip selection parameters used. In the absence of

Distribution

New, Passby Linked and Diverted Trips

For the Local Centre, Drive Thru and PFS uses the applicant assumes that no trips will be new to the network, 10% will be passby and 90% diverted from Wrexham Road. This is accepted on the basis of the floor areas included in the assessment at present (6,100m² of flexible floorspace comprising A1, A3, C1 use). However, the assessment at present does not take account of the full 16,100m² of flexible space being built out. An assessment of this is requested earlier in the note. With the likely increase in retail space that this will generate it is highly likely that a significant proportion of new trips would be generated. The applicant should review the proportion of new, passby and diverted trips when this assessment is undertaken.

Trip Distribution

Trip distribution has been undertaken using existing turning movements for all uses. This is not accepted; different uses will have different distribution patterns as will different vehicle types. The vast majority, if not all, of HGV traffic will route to and from Industrial Estate Road. For staff traffic at the B1, B2 & B8 uses distribution could be determined by census data or gravity model. The applicant should review the distribution methodology used. For all new assessments undertaken all vehicles, HGV and all non-HGV vehicles should be separately identifiable on traffic diagrams.

For assessment Scenario 1 the applicant has distributed 100% of development traffic through the Industrial Estate Road / Bryn Lane / Ash Road North / Adenbury Way roundabout. For Scenario 2 70% of development traffic is distributed to the new access on the roundabout and 30% to the new access on Bryn Lane. Justification for this split is required. It is expected that the split between accesses should be determined by traffic generation of each element of the development (by vehicle type), its location and origin / destination of traffic.

Committed Developments

We would request the applicant agrees this in detail with the council's planning officer, however can advise this should include

- P/2023/0280 and 0230 both on Bryn Lane
- The recently completed Net World Sports development that would not have been running at capacity at time of surveys for this development
- A recently received application for increase at New World Sports
- KSS1 site off Holt Rd, and Bryn Estyn Lane, predominantly for housing.
- Other industrial estate schemes

Active Travel

We recommend the applicant coordinates directly with Gwen Thomas, WCBC's Active Travel lead to review a series of active travel improvements considered necessary to facilitate the anticipated growth within the Wrexham Industrial Estate. We are currently finalising a scheme that will result in apportionment of the active travel improvement costs proportionally amongst the current applications, particularly to the north and east of the WIE. This includes both cycleway & footpath improvements, as well as supporting an improved bus service until their use gains momentum referred to earlier in this response. The improvement includes extending the route closer to this proposed development and increasing frequency of the buses.

In the absence of the above exercise being completed in time for this application to be determined, the main active travel improvements relevant to this application would be provision of:

1. Combined cycle and pedestrian access along Bryn Lane,
2. Improvements including illumination to the Active Travel route along Bryn Estyn Lane,
3. Provision of Active Travel routes around the proposed entrances to the site, particularly the proposed 5 arm roundabout, and
4. A contribution towards improved bus services to the site for a defined period whilst their use and viability gains momentum

Streetlighting: The Applicant should engage with paul.rogers@wrexham.gov.uk regarding street lighting improvements at the junction, which would form part of any S278 works.

Summary

The following summary of additional information and clarifications are requested from the applicant:

- Stage 1 Road Safety Audit and WCHAR of site access roundabout and new junction on Bryn Lane. Swept path analysis drawings, drawings showing existing road geometry proposed underneath proposed layout, drawings showing measured geometries for modelling and traffic models to be provided for review. Swept path drawings of the internal layout also required.
- The applicant should consult with Wrexham's Active travel Officer on the two access junctions on the appropriateness of the active travel facilities proposed.
- The applicant should liaise with Wrexham's Public Transport Officer on the potential for improved bus services / infrastructure in the local area.
- It is recommended that the Wrexham Public Right of Way Officer is consulted on the proposed improvements to the existing Public Right of Way inside the site.
- Stage 1 Road Safety Audit and WCHAR of internal layout if the intention is for the network to be adopted.
- Justification for the level of car and cycle parking provision should be provided by the applicant for the detailed application site based on the range of uses which could come forwards with reference to LPG16. B1, B2 and B8 uses all have their own standard.
- Analysis of risk of vehicle blocking back to Bryn Lane from Unit 2.
- Modelled assessment of all surveyed junctions and A5156 / Borrass Road / Borrass Park Road in addition.
- 2023 year assessment required and comparison of modelled performance against surveyed queues. 2037 assessment required in line with other applications.
- The assessment should provide analysis of potential impact should the full 16,150m2 come into fruition for A1, A3, C1 use. Without such an assessment the analysis is not robust.

- Industrial Estate Trip rate not accepted for the B1C, B2 & B8 uses. The applicant should provide a 'reasonable worst case' assessment of the development using robust trip rates reflecting the highest trip generating uses proposed.
- Hotel and local centre trip rates not accepted. The applicant should review the trip selection parameters used.
- Review of proportion of new, passby and diverted trips is required when the applicant assesses a development scenario where all 16,150m² of flexible space comes into fruition for A1, A3, C1 use.
- Trip distribution methodology is not accepted. The applicant should review the distribution methodology used. For all new assessments undertaken all vehicles (combined), HGV and all non HGV vehicles should be separately identifiable on traffic diagrams.
- Justification for the split of traffic between site accesses is required. It is expected that the split between accesses should be determined by traffic generation of each element of the development (by vehicle type), its location and origin / destination of traffic.
- A review of the active travel contributions is required and agreement of a commuted sum required.

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. Should it be required Wrexham Highways is happy to meet with the applicants transport consultant to discuss the points made in this note. There is other data available from neighbouring schemes that can be used to appraise the junctions approaching the site.

Our main concern lies with the proposed connections to the existing highway on Bryn Lane and the Bryn Lane/Blackwood Rd/Ash Rd North roundabout. The A483/A5156/Pandy and Llan-y-pwll roundabouts need to be reviewed in greater detail.

As noted previously in the Active Travel section, we request the applicant coordinates with WCBC's Active Travel officer to agree the details of the specific improvements listed in accordance with national guidelines, ensuring new development is adequately connected to encourage alternative means of transport to and from the workplace.



Chief Officer, Environment & Technical