MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO::	Dafydd Thomas
Our Ref:	ET/DC/MZ/P/2024/1675	**Your Ref:**	P/2024/1675
Date:	14/05/2025		

TOWN AND COUNTRY PLANNING ACT 1990

CAIS AMLINELLOL AM DDATBLYGIAD DIWYDIANNOL - O OFOD LLAWR DOSBARTH B1(C), B2 A/NEU B8 GAN GYNNWYS GOFOD SWYDDFA ATEGOL A SEILWAITH A GWAITH CYSYLLTIEDIG (POB MATER WEDI EU CADW YN ÔL) / OUTLINE APPLICATION FOR INDUSTRIAL DEVELOPMENT - CLASS B1(C) - LIGHT INDUSTRIAL, B2 - GENERAL INDUSTRIAL AND/OR B8 - STORAGE OR DISTRIBUTION INCLUDING ANCILLARY OFFICE ACCOMMODATION AND ASSOCIATED INFRASTRUCTURE AND WORKS (ALL MATTERS RESERVED)

LAND SOUTH OF DAVY WAY AND WEST OF, RACKERY LANE, LLAY, WREXHAM, LL12 0PB

I refer to your consultation / email dated 02/01/2025 in respect of the above.

It is the LHA's understanding that the proposals are for the provision of an outline application for upto 11,613 sq m of class B1C, B2 and or B8 employment floorspace including ancillary office accommodation together with associated infrastructure and works (including estate roads, yards, parking, footpaths, internal hard and soft landscaping and drainage works).

The submitted information included a travel plan, a Transportation Assessment, a site layout plan, a planning statement and some other documents. As the proposals are for outline permission for all matters, it is considered that the arrangements shown on the site layout plan could change at reserve matters stage.

Transportation Assessment

There seems to be some conflict over the proposed size of the site with 10,157 sq m quoted within the application form and 11,613 sq m quoted within the description of the submission which will have an impact on the data gleaned as the trip rates are calculated per 100 sq m of floorspace.

It is also noted that in the TA there is reference to an extant use, the submitted application form details agricultural use and the LHA would request further clarification on this as the site does not currently appear to be in use. Any deductions from the trip rate calculations should only be based on agreed extant use.

It is understood that all the matters of detail including the exact split of floorspace between B1C, B2 and B8 are still to be determined. On this basis the LHA would recommend a worst case scenario assessment, that reviews the highest level of trip data based on assessments for the three potential uses, and also considers the level of space required for the turning and servicing of HGV's within the site.

Data

The submitted information refers to the 2020 TRICS Good Practice guide but was only submitted in 2024, when there is now a 2024 TRICS Good Practice guide in place. Some of the information included is a bit out of date, the collision investigation data for instance.

The TRICS data includes site surveys that are over eight years old which does not comply with the TRICS Good Practice guide and the two sites in Ireland should be removed as they are not comparable.

The sites selected seem to be free standing or edge of town which appear relatively appropriate, however, the area of the sites selected being upto 40,000 seems quite extensive for the proposed size of the site, however it is accepted that there is a need for a representative sample of sites to be input into the system to glean robust outcomes.

The data seems to focus on peak times of 8-9am and 4-5pm which is not the pm peak, the TRICS Good Practice Guide 2024 which states that 'when presenting TRICS data it is considered good practice to provide trip calculation results covering peak hours of activity alongside the generally accepted 'road peak hours' i.e. 0800-0900 weekday mornings and 1700-1800 weekday evenings)'. It is accepted that the site peak hours for arrivals and departures may not necessarily correspond with the road peaks, however, as this is a speculative outline application there is no detail provided in relation to the likely hours of operation or shift work that may take place at the site. In cases where they do not correspond, trip rates for both road peaks and site peaks should be supplied.

There are also concerns about the methods used to extrapolate HGV trip numbers, for a site of this nature the numbers quoted appear very low and the two indicative plans indicate very different site layouts, one could support the operation of a variety of different businesses.

From a trip generation perspective the LHA would expect a higher number of HGV's and servicing movements for B8 use and for B1C there would be much higher car use. Using B2 or general industrial in TRICS could potentially downplay the level of trips for either of these use classes and therefore a worst case scenario should be assessed and modelled.

It is noted that surveys undertaken during the COVID-19 pandemic have been removed from the data which is acceptable.

Modelling

Traffic Surveys

It is accepted that the traffic surveys gleaned were undertaken in a neutral month during 2023.

Trip Generation & Distribution

The methodology employed for the trip generation and distribution has been based on a rather standard method of using travel to work census data from the 2011 Census which it seen as the most robust survey due to Covid-19.

Super output area (MSOA 020) has been used which covers the local area and the splits relating to trip distribution look reasonable, with 8% within MSOA 020, 70% within wider Wrexham and

the remainder to Flintshire, Shropshire, Cheshire West and Chester. The origin-destination seems reasonable for employees and visitors of the site. The HGV distribution seems rather speculative with 30% proposed to travel to Llay Road, 35% to the A483 travelling north and 35% to the A483 travelling south which could impact the modelling outcomes.

Methodology

The vehicle trip generation has been gleaned from TRICS for vehicle trips. The issues raised in regards to the TRICS sites used and the peak periods means that the trip generation requires updating, therefore the LHA feels there is little point at this stage providing extensive comments on the modelling supplied as the data updates will influence the modelling outputs.

The methodology does appear to be based on a base year of 2023, followed by a 2029 year with the base traffic levels and a 2029 year with base traffic levels + development traffic, there doesn't appear to be a future assessment undertaken, which the modelling would benefit from.

The latest version of TEMPRO traffic growth assumptions have been employed to the data on both the 2029 base traffic data and the 2029 base traffic data + development traffic.

The modelling undertaken does flag up some concerns with the operation of the Rackery Lane / Chapel Lane / Gresford Road / B5102 junction that is located in close proximity to the Aldi. The traffic signal controlled junction at this location was installed in the last few years and does incorporate MOVA. Whilst the applicants transport consultant argues that the impact of the development traffic is negligible, with the growth factor applied and the proposed traffic generation from the development currently proposed, the modelling indicates that the junction would exceed its Practical Reserve Capacity. It is understood and accepted that the Linsig model doesn't take account of the demand dependent phase on the Chapel Lane approach which may not be triggered on each cycle of the lights, when not triggered this green time is reallocated to the other arms and therefore the modelling provided could be seen to represent a worst case scenario.

At present there is no pedestrian phase across the Rackery Lane arm of the signals and it is considered that such a provision would be beneficial to aid staff from the site and from the wider Industrial estate to cross the junction to access the Aldi on foot. Such a facility would potentially require an all red phase within the signals which would potentially impact the capacity of the junction. Therefore further analysis and assessment on this junction and its operation is deemed necessary as part of the proposals.

It is unclear if the modelling indicated has used the same pm peak hour set out in the TRICS data of 4-5pm or whether it has used the network pm peak of 5-6pm, clarification is required and it is considered that the 5-6pm pm peak period should be utilised moving forward.

The TA made no mention of committed developments within the vicinity of the site, the applicant should review and make reference to this within the modelling assessments to ensure that all committed development trips are incorporated into the modelling assessments undertaken.

No detail has been undertaken in relation to person trips / multi-modal approach to assess non-car mode trips, which could also use Census data from 2011 and National Travel Survey data to find likely levels of trips for different modes of transport.

The modelling undertaken has utilised the Junctions 9 software, which has since been upgraded to Junctions 11 which indicates that the modelling may require updating.

Access arrangements

Whilst the proposals are indicated as outline, two indicative access points have been indicated within the submission. Both are located along Davy Way which is currently a 20mph road. With some double yellow lines installed along it for a stretch of junction protection measures from its

junction with Rackery Lane. There is a footway located along the frontage and a grass verge. There are no pedestrian crossing facilities within the vicinity of the site.

Visibility Splays

It is noted that the submitted drawings indicate visibility splays for accesses onto Davy Way for 20mph roads of 2.4m x 25m to the nearside kerbline which complies with the required visibility for a 20mph road, however in light of the recent change in stance of the Welsh Government the LHA would raise that it may be appropriate for the provision of visibility splays for a 30mph road, of 2.4m x 43m for the proposed vehicular access point.

Swept Paths

Whilst swept paths for 16.5 articulated HGV's have been shown for both of the indicative site access points, they seem tight and it is the LHA's view that a proposed access of this width would require a pedestrian refuge island In the centre and appropriate dropped kerbs and tactile paving to ensure pedestrian safety is not compromised at the site access. Swept paths for internal routes will also be required at reserved matters stage when further detail is supplied. LPGN 16 states that an area for HGV's to load / unload and turn within the site will normally be required for B2 and B8 uses.

Active Travel

Whilst the submitted TA details the local bus services and train stations closest to the site, there has been no audit on the quality of the pedestrian routes to these, whether dropped kerbs and tactile paving are in place or appropriate crossing facilities. This is required in order to determine if further mitigation measures are required within the vicinity of the site.

Footways of width 2m will be required within the site and also cycle parking and facilities suitable for long stay use, further details are supplied within LPGN16 but the LHA would also recommend the provision of showers, lockers, changing rooms and a drying room to enable cyclists to travel to the site in all weathers. Safe routes within the site to Davy Way that do not conflict with HGV movements should also be detailed within the reserved matters submission to ensure safety is not compromised.

Mitigation Measures

Any mitigation measures that affect the Councils adopted highway will require the submission of swept paths and Stage 1-3 Safety Audits and will need to be secured through a Section 278 Agreement.

Parking

Car

The requirements for car parking are set out within LPGN16. It is noted that the applicants transport consultant has referred to the parking figures for B2 use as robust, the LHA would raise that the parking requirements for B1C are higher than B2 and therefore this should be considered moving forwards to ensure the parking proposed for the development is fit for purpose.

10% of the parking spaces provided should be accessible as set out in LPGN16. The design and dimensions of the spaces required are also detailed within the document.

Cycle

The requirements for cycle parking are set out within LPGN16 and the applicant should ensure that long stay cycle parking is provided, secure and covered in a well overlooked location to comply with the requirements set out within the document. The Design & Access statement submitted has detailed a covered cycle parking store which appears to include Sheffield stands, whilst this design

appears acceptable in principle it should be located in a secure lockable compound to ensure it is appropriate for long stay purposes.

HGV

Should the development feature substantial levels of B8 floorspace there would be a requirement for the applicant to demonstrate that adequate parking spaces is available for HGV's within the site.

The LHA would recommend the provision of motorcycle parking spaces with secure lockable points and the provision of electric vehicle charging points for cars and bicycles would be welcome additions to the proposals.

Waste Management

The LHA would request clarification relating to the proposed waste management arrangements at the site. Whilst some details of the proposed waste management storage are indicated within the Design & Access Statement there is insufficient detail provided within the proposals at this stage and this will require further detail at the reserved matters stage.

Travel Plan

The LHA has reviewed the submitted travel plan but it appears to be a rather standard document that doesn't provide much in the way of specific smart targets or incentives to encourage active travel. A target of 10% mode shift from single occupancy vehicle trips is outlined but without specific measures over the proposed 5 years, the LHA is unsure whether that target would be achievable. The LHA would recommend incentives are outlined and local facilities set up to support staff, such as a car share scheme with a guaranteed lift home in times of sickness, a free months bus pass for new starters, cycle loan scheme etc. More specific local actions such as these are likely to have greater impact.

Summary

Whilst there are no objections in principle to the proposals, the traffic assessment, trip generation and traffic modelling work provided does not provide a clear picture of the impacts of the proposed development on the local highway network. Further work is required to this end to ensure a robust assessment of the proposals has been undertaken.

Further detail is required in regards to active travel to ensure that any required mitigation measures are detailed and agreed as appropriate at outline stage.

Further clarification is required in relation to the proposed floorspace of the development and also the extant permission that may be in place for the site that could affect the trip generation.

Amendments are also required to the sites surveyed in the TRICS assessment, the type of use surveyed and also the pm peak hour utilised.



On behalf of Chief Officer, Environment & Technical