Elis Roberts

From: planning
Sent: 16 June 2025 10:34
To: Elis Roberts
Subject: FW: Planning application P/2025/0427 (LAND AT ERLAS PARK, CEFN ROAD, WREXHAM, LL13 9TT)

Elis please add to the file as general consultation.

From: Paul Bevan | Cycling UK <paul.bevan@cyclinguk.goassemble.com>
Sent: 13 June 2025 16:33
To: planning <planning@wrexham.gov.uk>
Subject: Planning application P/2025/0427 (LAND AT ERLAS PARK, CEFN ROAD, WREXHAM, LL13 9TT)

Planning application P/2025/0427 (LAND AT ERLAS PARK, CEFN ROAD, WREXHAM, LL13 9TT)

Dear Mr Mullineux,

I write in reference to planning application P/2025/0427 (LAND AT ERLAS PARK, CEFN ROAD, WREXHAM, LL13 9TT).

This application relates to a very large housing development which, if designed incorrectly, will directly undermine both Wrexham and Welsh Government policies in relation to Active Travel and modal shift. As a result,my objections relate specifically to the lack of consideration of appropriate Active Travel infrastructure in the outline application.

A response on behalf of CyclingUK was submitted to the pre-application consultation by the applicant, although there does not appear to be significant consideration given to consultation responses in the PAC report. As such, this response to the outline application repeats the same key points.

Support for Active Travel is both embedded and explicit in Welsh Government (Planning Policy Wales 12, Future Wales, Active Travel Act 2013 (and Statutory Guidance)) and Wrexham's planning policies (including the Local Development Plan). This reflects the well understood health, social, economic and environmental benefits of Active Travel. The site is well positioned to support Active Travel if appropriate design choices are made, however this is not clearly the case in the current proposals made available for consultation.

Large developments in particular must take appropriate account of the requirement to support and expand Active Travel in preference to personal cars. From the documents provided, there are a number of areas where the proposed development fails to meet the requirements to support Active Travel including:

External Connectivity via Cefn Road
The proposed layout has a number of entrances to Cefn Road. It is vital that Cefn Road is improved to support Active Travel both from the site and along the road. Current Active Travel route WX-WRE-C006 exists on part of the road and proposed route INM-WX-WRE-C053 runs the entire extent of the development, both of which must be safeguarded and upgraded.

There is no indication of intent to do this in the proposals. Although unadopted, 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.

Given this policy, the Council should consider requiring the applicant to fund the necessary upgrades to Cefn Road, including the provision of appropriate segregated cycle lanes on Cefn road. The proximity of the development to Ysgol Morgan Llwyd will support school-age residents to walk or cycle to the school. It is essential that appropriate crossings for both walking and cycling (e.g. Toucan crossings) are also provided.

The design of entrances should must allow safe walking, wheeling, and cycling and also support the design of this upgraded Active Travel route. These do not comply with Welsh Government's Statutory Active Travel Guidance design standards, in particular by not supporting connectivity of journeys by Active Travel means over the three entrances on Cefn Road. Instead they prioritise motor traffic, directly against both Welsh Government and Wrexham CBC policies.

The upgrades to Cefn Road should be made prior to the development commencing in order to maximise the benefit to all. Leaving the completion of these improvements until later phases would significantly undermine this work and increase disruption to those walking, wheeling and cycling during the housing construction period.

External Connectivity via Bryn Estyn Road

Bryn Estyn Road is already an identified Active Travel Route (INM-Wrex-WIE-C012) with proposals to upgrade as WX-WRE-C038/W004.This is an essential Active travel connection to Redwither Lane and on to Wrexham Industrial Estate and employment opportunities.

Linkages between the two elements of the site are not clear and whilst there are two indicated 'pedestrian/cycle links' to Bryn Estyn Road, this must be clear and well designed entrances for walking, wheeling and cycling, using appropriate materials and with no barriers.

It is noted that other developments (KSS2) may also link the site to Bryn Estyn Road, but these are not confirmed and, regardless of improvements, this link is necessary. These entrances, as with all aspects of walking, wheeling and cycling infrastructure, should be designed in line with Welsh Government's Statutory Active Travel Guidance design standards.

Connectivity between the Bryn Estyn area and the Wider Site

The current proposal indicates connectivity via a "Retained / proposed pedestrian / cycle route" but no clarity or detail is provided. This should be clearly indicated, even at outline stage, as being well designed (in line with Welsh Government's Active Travel Guidance design standards) paths suitable for use for walking, wheeling, and cycling. It is not possible to tell whether they would simply remain as footpaths, unsuitable for wheeling and cycling, or be properly implemented Active Travel routes. The main routes identified on the map are already noted within Wrexham's Active Travel Network Map as future routes for both walking and cycling (Wrex-Wre-SUP195).

There is an obvious opportunity for wide and well designed routes along the existing footpath at the top of the Retained Playing Fields, connecting to the main estate and to the pathway running up the centre of the lower development.

It is essential that these routes are implemented as part of Phase 1 and not impacted by Phase 2.

Site Permeability

The general design appears to support walking, wheeling and cycling between areas of the site but this will not be clear until the full design is provided. As a low traffic design, cycling should be possible throughout the site and pavements appear to be provided for walking and wheeling.

It is essential that paths are appropriately formed and surfaced in order to support all users, particularly cycling (including accessible cycles used as mobility aids), wheelchairs, and mobility scooters. Roughly surfaced paths are not accessible for all users, and only wider multi-use paths are appropriate to support walking, wheeling, and cycling across the site (including in the publicly accessible pathways in Phase 1b). As with all aspects of walking, wheeling and cycling

infrastructure, paths (including cycle and multiuse paths) should be designed in line with Welsh Government's Statutory Active Travel Guidance design standards.

Central 'Green Spine'/Pathway
The design includes a central 'green spine' which appears to be intended for Active Travel connectivity. However the current plans to not provide enough detail to be clear on its appropriateness. For example, the 'spine' should be linked to the surrounding areas on suitable (tarmac) surfacing to allow easy use of the 'spine' to transit within the site without needing to use the roadways.

This is a positive inclusion, however it is essential that this is designed appropriately as a safe and practical transport route.The design appears to bend unnecessarily when a straight Active Travel route is preferred and will encourage use. Other design requirements include ensuring that the path is of an appropriate width (and segregated between walking and cycling if appropriate), is formed and surfaced appropriately, is lit appropriately, and that crossings are safe and priority is given to Active Travel over roadways (again, in line with Welsh Government's Active Travel Guidance design standards).

The 'Green Spine' appears to be designed to link to KSS2 if built in the future, and to the track to Llwyn Knottia Farm and these entrances/links must be designed well to allow users to cleanly join the pathway. Similarly there should be connectivity with the cycling and walking route to Cefn Road (and therefore Ysgol Morgan Llwyd) and, via that to the cycling and walking links to Bryn Estyn road.

Cycle Storage
Although detailed designs are not available at this stage, the design of houses should all provide suitable secure Cycle Storage in a location which facilitates easy Active Travel (i.e. close to road/pathways). It may also be appropriate to ensure charging facilities for e-bikes within those storage areas. Appropriate cycle storage (e.g. Sheffield Stands) should also be included in the design for the Primary School and at any play areas or other shared facilities.

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 ensure to:

Ensure the design of entrances, routes on the site, and access points all support walking, wheeling and cycling and are designed in line with Active Travel Act Statutory Guidance.

Require the applicant to fund or otherwise support the delivery of the required Active Travel infrastructure along Cefn Road (including active travel routes Wrex-Wre-W104, INM-WX-Wre-C053, and crossings including to Ysgol Morgan Llwyd) and through the site (including Wrex-Wre-SUP195). This should be in place prior to any development, to bring forward benefits for the wider community.

Comply with their commitment to cycle storage facilities within the site through making this a condition of the planning permission if granted.

Many thanks,

Paul Local Representative of Cycling UK in the Cycle Advocacy Network

This email was sent on behalf of Cycling UK via Assemble.