

MEMORANDUM



From:	Chief Officer, Environment & Technical	To:	Chief Officer Economy & Planning
		FAO::	Sharon Holman
Our Ref:	ET/DC/MZ/P/2024/0231	Your Ref:	P/2024/0231
Date:	18/09/2024		

TOWN AND COUNTRY PLANNING ACT 1990

NEWID DEFNYDD ADEILAD O UNEDAU DIWYDIANNOL I GAMPFA / CHANGE OF USE OF BUILDING FROM INDUSTRIAL UNITS TO GYM UNITS 27 - 29 ABENBURY WAY WREXHAM INDUSTRIAL ESTATE WREXHAM

Grid Ref: E 337336.02 N 350408.25

I refer to your consultation 16/08/2024 with additional information in respect of the above.

It is the LHA's understanding that the proposals are for the change of use of building from industrial units to gym, three units are proposed to be used within the Wrexham Industrial Estate on Abenbury Way.

Local Planning Guidance Note no 16 sets out the required car parking and cycle parking within Wrexham. For D2 Assembly and leisure uses there is a requirement for 1 car parking space per 15 sq m and 1 cycle parking space per 150 sq m gross floor space. Therefore on the basis of the floorspace proposed the provision of 83 car parking spaces are required and the provision of 8 cycle parking spaces should be provided. The design of cycle parking spaces should be Sheffield stands for short stay parking and should be 750mm high, 700mm long and set at least 250mm into the ground, they should be spaced a minimum of 800mm apart and be no closer than 500mm to a building or blank wall.

For long stay cycle parking for staff developers should provide more secure parking facilities in the form of cycle cages or lockable bicycle shelters. Alternatively secure compounds within buildings may be acceptable providing that they are located at ground floor level and are accessible. All cycle parking areas should be located in well lit areas that are overlooked from the building they serve.

The submitted TA details that 32 car parking spaces are proposed for the use but the LHA is concerned that the proposed car parking spaces do not all fall within the designation of the units 27-29 specified. The highway note submitted has detailed 5 car parking spaces being provided in front of the neighbouring unit and the aisle width required to access and egress these spaces would be outside the site also, which is not acceptable. The applicants highway note states that these spaces would only be required during the peak 5-6pm hour according to the car parking accumulation work undertaken as part of the TRICS assessment submitted.

The LHA is concerned that these car parking spaces could not be secured should there be a change of operator at Unit 30 and there are no ways to formally strict the opening hours on a neighbouring unit on this basis. Therefore any parking provision needs to either be on site or off-site (and close by) on land under the applicants control. A site visit was undertaken by the LHA and high levels of parking were noted on-street in the vicinity of the site and therefore concern remains that the shortfall from parking could exacerbate the existing parking pressures in the vicinity of the site.

The submitted highway note does explain that there is limited TRICS data available for leisure and gym uses and indicates that the sites selected extended over a decade in time to ensure that as many sites as possible could be used to be representative. The note also indicated that the applicant states that 'in their experience' the level of parking proposed is adequate for the use. The LHA remains concerned that the car parking accumulation work which the applicant is using to justify a lower level of car parking from the standards may not be robust. The LHA would question whether a survey by an independent body of a similar site, in a similar location would provide a more robust comparison.

The proposals indicate the provision of 10 cycle parking spaces which would appear to meet the car parking standards, although these are proposed in a short stay arrangement which would not be attractive for staff to use who will need secure long stay provision. The applicant has detailed that secure long stay parking for staff will be provided within the building and that this could be secured by condition, the LHA finds this acceptable.

The data submitted from TRICS indicates a peak in users within 5-6pm which corresponds to visits on the way home from work. No details or surveys have been provided in relation to on-street parking within the vicinity of the site at this time.

The LHA previously requested information regarding servicing at the site, although it is anticipated that the servicing requirements may not be extensive, clarification is required about the arrangements and how they will be undertaken. The submitted note discusses refuse vehicles but makes no reference to deliveries to the site, what deliveries will there be, how often and what vehicles would service? Would this be undertaken at off-peak times. Clarification is required.

There is an area marked out for motorcycles but no secure locking points are detailed, the applicant has responded that they are happy to provide secure locking points, and that this could be secured by condition. This is acceptable to the LHA.

In terms of access on foot, the proposed access would be through the car parking aisles which does not provide a designated safe route in terms of access for all. There are two different access points to the building, a main entrance and a 24 hour entrance, both accessed from aisles within the car park. The highway note details that this has been amended in the drawing shown in appendix C, however, this doesn't appear to be, no safe route of access is provided. The LHA would suggest a footway along the frontage of the building to link to the pathway where the cycle parking is located, 2m width without obstructions should be provided.

In its current form the LHA is concerned that the proposals constitute a large shortfall from the required car parking standards and the proposed car parking that is not under the direct control of the applicant is not acceptable. There are concerns that visitors in the peak hour of 5-6pm will visit on their way home from work and there will be inadequate car parking provision to provide for them, at a location that is currently experiencing high levels of on-street car parking, the proposals could further exacerbate this and compromise highway safety in the vicinity of the site. The TRICS data submitted is by the applicants own admission limit and therefore it is suggested that an independent survey of a site of similar use in a similar location would be advisable to ensure that the parking provision and proposals are fit for purpose.

The applicant has raised their acceptance of signing up to a car parking management plan and undertaking surveys as part of such a plan and to providing Traffic Regulation Orders (TRO's) to ensure that obstructive parking doesn't result on the public highway. However, in the LHA's view these issues need to be understood fully and addressed prior to a planning permission consent being granted.

There are concerns in regard to the trip generation and car parking accumulation data provided which might not provide a clear indication of the proposed parking demands that could occur at the site.

Therefore in its current form the LHA is unable to support the application.

A handwritten signature in black ink, appearing to be 'S. J. [unclear]', written in a cursive style.

Chief Officer, Environment & Technical