

ADL/CC/4171

13 May 2024

Sarah Carpenter
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Dear Sarah

**Re: APP/P/2023/0384 – LAND AT ARGOS CAR PARK, PLAS COCH RETAIL PARK,
PLAS COCH, WREXHAM, LL11 2BW**

ADL Traffic and Highways Engineering have prepared this letter in response to the Councilor's decision to defer the above planning application pending further transport information.

This letter sets out the extensive planning submissions and highway consultee involvement. The reports have clearly outlined the committed development and base levels of traffic assessed. The modelling scenarios which have been assessed are explained and evidence provided as to why these assessments are very robust. Clarification on the effect on highway safety and parking situations are also included.

1) Planning Submissions

The above planning application is the second application following application P/2019/0919 and Appeal CAS-01515-G4Y1D3. Through the course of these applications the following documents have been submitted to the Council;

- Transport Assessment (December 2019)
- Transport Assessment (Volume 2) (December 2020)
- Delivery Management Plan (December 2020)
- Stage 1 Road Safety Audit (October 2020)
- Designers Response to Stage 1 Road Safety Audit (December 2020)
- Proof of Evidence (November 2021)
- Addendum Transport Statement (September 2023)
- Response to Highway Comments (October 2023)
- Response to Highway Comments (November 2023)

The volume of transport work which has been submitted is substantial. The transport submissions have been reviewed by; Wrexham Highway Authority, Mott MacDonald (transport consultants acting on behalf of Wrexham Highway Authority), the Welsh Government and the Planning Inspectorate.

Four separate professional transportation/planning organizations have now unanimously concluded that there is no reason why the development should not be permitted. This is clearly testament to the robustness of the work submitted by ADL.

The opinion of Council Members that the Transport Assessment work lacks in any way in terms of validity or technical accuracy is wholly without evidence or technical substance.

2) Committed Development

ADL's Proof 2021 included an assessment of Committed Development which was agreed with Wrexham Highway Authority. This included application P/2018/0671 and P2018/0672 for 410 dwellings and 197 student flats on the University site. Although application P/2019/0923 for 455 dwellings at Stansty was not at this time committed development **it was included with the traffic assessment.**

The Committed development assessment was agreed with Wrexham Highway Authority and updated as part of the Addendum Transport Statement (September 2023). The included development is summarized in Table A below.

Table A Committed & Parallel Developments

Planning Ref:	Status	Development
P/2018/0384	Committed	Drive Thru Coffee Shop, Plas Coch Retail Park, Plas Coch, Wrexham
P/2018/0357	Committed	Extension of Plas Coch Public House (24 bed lodge), Plas Coch Retail Park, Wrexham
P/2021/0094	Committed	Erection of 90 residential units, Glyndwr University
P/2022/0725	Committed	5,500 spectator seat stadium including 500 capacity hospitality area, 600 capacity non match day exhibition space. The Racecourse Mold Road.
P/2021/0955	Committed	112 residential units Gatewen Road
P/2019/0923	Pending Decision (Parallel development but treated as committed for purposes of this report)	Proposed 455 new dwellings on land off Mold Road, Stansty, Wrexham

The M&S applications (P/2022/1009 and P/2023/0519) create no new Class E floor space. No transport information was required to support these applications and the Highway Authority raised no objection. The unit was previously occupied by a gym (also Class E) during the traffic surveys commissioned by ADL. It should also be noted that the adjacent Frankie and Benny's restaurant unit was permitted to be demolished (P/2022/0102) in 2022 to be replaced with car parking. Overall there has actually been a reduction in floor space within the Retail Park. The traffic assessment which ADL have been provided for the Retail Park is therefore robust.

The 455 dwellings at Stansty was granted resolution for consent at committee in January 2023. This development will generate more traffic on the network. This has been accounted for. The development also includes highway improvements to the A483 J5/Berse Road Roundabouts including a combination of alterations to road markings and signalization of the circulatory roundabout at Junction 5 of the A483 for traffic travelling west (from Wrexham) and south (from Chester or Mold). These improvements would result in a net benefit in terms of the overall capacity of the junctions compared to the base situation. These improvements were clearly presented to Councilors at the 8th January 2024 Committee Meeting.

3) Baseline Traffic Levels

ADL submitted an Addendum Transport Statement (September 2023) to determine whether the conclusions of the 2021 Proof based on pre COVID traffic surveys were still robust. This approach was in liaison with and entirely consistent with that undertaken by Focus who were planning consultants for the 455 dwelling Stansty Development.

The committee report for the Stansty Development concludes;

The 2023 surveys identify some modest changes overall in peak time traffic demand compared to 2019, notably the AM peak extending over a longer period. Traffic flows at the circulatory roundabout of Junction 5 of the A483 and the Plas Coch Road/Mold Road/Berse Road roundabout were 8.6% and 8.5% lower respectively than in 2019. Overall, the 2023 surveys demonstrate that the findings of the 2019 TA remain robust.

The Highway Authority and Council Members have therefore already agreed that the current baseline traffic flows are likely lower than those considered by the Inspectorate by the region of 8%.

4) Modelling Assessments

ADL have modelled the Berse Road Roundabout and A483 J5 Roundabouts for the following scenarios. The 2036 Base scenario includes all committed development and is equivalent to an 8-10% uplift on pre Covid survey levels.

In addition a 2036 base sensitivity assessment was undertaken with a 17-18% uplift assumed. Given current surveyed traffic levels are around 8% lower than pre Covid the base and sensitivity assessment traffic flows are very robust.

- 2036 Base (Pre Covid Surveyed + All Committed Development = 8-10% uplift on Pre Covid Survey)
- 2036 Total (Pre Covid Surveyed + All Committed Development + McDonalds)
- 2036 Base Sensitivity (TEMPRO sensitivity test = 17/18% uplift on Pre Covid Survey)
- 2036 Total Sensitivity (2036 Base Sensitivity + McDonald's)

The permitted highway works as part of the 455 dwelling Stansty development have been included in the modelling.

The proposed pedestrian crossing on Plas Coch Road has been included in the modelling for the 'with McDonald's' scenarios.

Mott MacDonald have forensically interrogated the models independently on behalf of the Highway Authority and are satisfied that they are correct. The Highway Authority comments of 7th December 2023 states that

"We note that WCBC specialist consultants have, acting on the Highway Authority behalf have accepted the accident analysis commentary, and LINSIG modelling."

The updated modelling results are very similar to those previously reviewed by the Inspectorate. The effect on the operation of the Roundabouts and queues would be minimal. The Highway Authority have therefore concluded that the opinion of the Inspectorate was still entirely valid and raise no objection.

5) Highway Safety

As part of the previous Appeal and planning application there was an independent Road Safety Audit was undertaken by TMS, of the site and local road network. All matters raised have been addressed.

A detailed assessment has been provided of the pedestrian activity in the vicinity of the site as part of the Proof. The proposed pedestrian crossing would be highly beneficial in terms of improving highway safety not just for customers to the restaurant but also existing visitors to the Retail Park and residents of the new 90 dwellings at the University.

The Inspector very clearly concluded (para 24 of Appeal decision) that the proposal would not harm highway safety.

As outlined above an independent assessment of the recent accident analysis by Mott MacDonald has been accepted.

6) Parking Provision

There have been three independent surveys undertaken of the Retail Park car park in 2019 and 2021. During the busiest period the car park was recorded as still having 42% available parking and 97 available spaces.

Wrexham Council Highway Authority visited the Retail Park on a Saturday in October 2023 and agree that there is adequate existing parking provision and that there is unlikely to be any large impact by the net reduction in parking spaces (Highways comments 6th November 2023)

Summary and Conclusion

This application now contains a vast amount of surveys and subsequent reporting to support the development. This has been independently reviewed by Highway Authority, Welsh Government, Planning Inspectorate and Mott MacDonald acting for the Highway Authority. It has been repeatedly and robustly demonstrated that there is no highways reason why this development should not be permitted.

It is considered that the position of McDonald's in terms of highways is now even stronger compared to the last application in light of the Inspectors highways comments and the additional work undertaken with Mott MacDonald/Highway Authority. We see no reason why a second Appeal would result in any different conclusion by the Planning Inspectorate.

We trust that this is sufficient to enable Members to now determine the planning application.

Yours sincerely
for **ADL TRAFFIC AND HIGHWAYS ENGINEERING LIMITED**

Catherine Chapman

CATHERINE CHAPMAN
DIRECTOR

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