

MEMORANDUM

From:	Chief Officer, Environment & Technical	To:	Chief Officer Planning & Regulatory
		FAO:	Amy Brittain
Our Ref:	ET/DC/MM*DB/P/2023/0230	Your Ref:	P/2023/0230
Date:	20 th October 2023		

Land East of Bryn Lane, Wrexham Industrial Estate, Wrexham, LL13 9UT
Two industrial buildings suitable for B2 and B8 User classes, associated parking, new highway access, ecological protection and enhancements, landscaping, and associated works.

Further to your email / consultation dated 12/05/2023 in respect of the above, we comment as follows:

The application submitted (P/2023/0230) is for the erection of two industrial units on Wrexham Industrial Estate (B2 and B8 land use classes), with proposed Gross Internal Areas (GIA) of 4,339sqm and 4,132sqm respectively, totalling 8,471sqm GIA. The site is currently vacant but was previously used for employment uses.

The application is a re-submission of P/2022/0017, which also proposed the erection of two industrial units (Class B2/B8) for a slightly larger development of 9,045sqm GIA. The application was withdrawn prior to determination; however, a previous response by Wrexham Council Highways Development Control (ref: ET/DC/MM/P/2022/0017, dated 17th March 2022) considered a number of matters including traffic generation, access arrangements, car parking, road safety, site layout and sustainable transport options).

The previous Transport Statement (TS) (AMNI Transportation document reference: 214-21-1A, dated 18.11.2021) has been submitted as part of the current planning applications and therefore does not reflect the amended development proposals, as shown in Proposed Site Plan (1175.P.003 (A) dated: 03.04.23). However, it is noted that the trip generation assessment presented within the TS reflects the larger, withdrawn development (9,045sqm GIA).

It is noted that a separate planning application (P/2023/0280) has been submitted in relation to the 'Kingmoor' development on land immediately to the north of the application site, for up to 93,019sqm net floorspace of warehouse and distribution (Class B8) use. It is considered that the interactions between the two developments and the cumulative impact of both developments should be assessed. The TS accompanying application P/2023/0230 does not consider the impact of development to the north (P/2023/0280). A number of recommendations are therefore provided throughout this response to address this point.

In addition, there are other significant schemes/applications currently being considered, such as P/2023/0497 Land North of Bryn Lane. We are reviewing the cumulative effect of all the applications on Bryn Lane, and approach roads/junctions, predominantly from the A483 to Wrexham Industrial Estate.

Site Access and Layout

The development is proposed to be served by two points of access. The following review considers matters that are common to both accesses first and then considers each access in turn.

General

Drawing 214-21-1A shows a swept path analysis for a vehicle of 15.4m in length. These drawings demonstrate that the articulated design vehicle can manoeuvre within the site constraints and access and egress the site in a forward gear. The swept path shows that the turning area for these large vehicles will not impact the parking area on site. However, it is noted that the length of the maximum legal articulated HGV is 18.55m; therefore it is requested that the applicant provides justification for why a smaller design vehicle than the maximum legal articulated vehicle has been used; or provides revised swept path drawings based on a 18.55m long maximum legal articulated vehicle.

Unit 1 access

Unit 1 would be accessed via a new priority-controlled T junction to the north, connecting with an unnamed road serving the Very Group distribution centre. The road is unadopted. The position of the proposed access serving Unit 1 will form a crossroads priority junction with an existing access serving a large HGV parking area to the north of the distribution centre access road.

It is noted that application P/2023/0280 proposes a new priority-controlled access on the northern side of the distribution centre access road, located 50m to the east of the junction with Bryn Lane and 40m to the west of the existing HGV parking area access. The HGV parking area is proposed to be redeveloped and the access removed.

It is recommended that the proposed access arrangements to Unit 1 should be considered within the context of the proposed development to the north. A Road Safety Audit Stage 1 should also be provided.

The visibility splay drawings included in Appendix C of the TS only demonstrate visibility splays for the northern access from the minor arm to the left. It is requested that the visibility splay drawings should be revisited and include splays in both directions, or account for vehicles departing the Very Group distribution centre. The drawings should also confirm that there will be no obstructions above 600mm in height within the visibility splays.

Unit 2 access

Unit 2 would be served via an existing priority T junction with a ghost island facility on Bryn Lane, located along the western boundary of the site. Bryn Lane is an adopted highway and traffic is subject to a 40mph speed limit. The proposed arrangements are considered to be appropriate for the size and scale of the development and the nature of the road.

Pedestrian and cycle access

External connections

An existing shared use footway/cycleway is present on the western side of Bryn Lane; however there is no existing footway or cycle provision on the eastern side of Bryn Lane in the vicinity of the development site or existing crossing facilities. The proposed development does not address these issues.

Pace Architecture drawing 1175.P.003 indicates two proposed internal pedestrian routes, serving Units 1 and 2 respectively. Drawing annotations state “link to existing footway” at the interface of these routes with the site boundary; however as stated above, there is no existing footway or cycle provision on the eastern side of Bryn Lane; therefore it is unclear pedestrian and cycle access to the site from the existing active travel network will be achieved.

In order to provide pedestrian and cycle access to the site, a new crossing will be required on Bryn Lane, together with connections to the internal route.

An assessment of the appropriate type of crossing, in accordance with Active Travel Act Guidance (ATAG) (2021) should be undertaken by the applicant, but as a minimum should comprise dropped kerbs and tactile paving. The need for a refuge to provide a safe waiting area for pedestrians and cyclists should also be considered. Appropriate pedestrian and cycle connections between the crossing and Units 1 and 2 should also be provided.

The Applicant should also be cognisant, but not reliant on the crossing facility proposed in conjunction with the Kingmoor development for an informal crossing facility on Bryn Lane to the north of Very Group distribution centre access road junction.

Following consultation with Gwen Thomas (WCBC’s Strategic Transport Manager, leading Active Travel), the applicant is requested to consider contribution to the following improvements to create safe active travel access to and from this proposed development:

- 1. Creation of a route for walking and cycling segregated from motor vehicles to current Welsh Government Active Travel Act Guidance standard along the length of Bryn Lane, terminating at Oak Road to the south and the roundabout of Ash Road (North)/Abenbury Way/Blackwood Way (or Wockhart).*
- 2. Segregated provision for pedestrians and cycle users in accordance with the Welsh Government Active Travel Act Guidance standard to enable safe and direct crossing of the roundabout (Bryn Lane/ Ash Road (North)/Abenbury Way/Blackwood Way).*
- 3. Resurfacing of Bryn Estyn Lane.*
- 4. Installation of street lighting on Bryn Estyn Lane.*
- 5. Creation of a route for walking and cycling segregated from motor vehicles to current Welsh Government Active Travel Act Guidance standard along the length of Blackwood Way between the roundabout (Bryn Lane/ Ash Road (North)/Abenbury Way/Blackwood Way) and Gourton Hall Roundabout. This will need to link to (the old) Holt Road.*
- 6. Creation of walking and cycling route to Welsh Government Active Travel Act Guidance standard along Old Holt Road to link to Beacon Lane.*
- 7. Traffic counts for Francis Lane and if appropriate, installation of signage as a Quiet Lane as far as junction with B5130. (Similar could be done for Bryn Estyn Lane and Sandy Lane)*
- 8. Segregated provision for pedestrians and cycle users in accordance with the Welsh Government Active Travel Act Guidance standard to enable safe and direct crossing of the Gourton Hall Roundabout to allow for safe crossing to Holt Road from new route alongside Blackwood Way (5).*

9. *Creation of a route for walking and cycling segregated from motor vehicles to current Welsh Government Active Travel Act Guidance standard along Holt Road (A534) east of the Gourton Hall Roundabout as far as Hugmore Lane.*
10. *Walking and cycling crossing to Welsh Government Active Travel Act Guidance standard to enable to crossing to/from bus stop on Holt Road, - stops Llan-y-Pwll after Hugmore Lane and Llan-y Pwll before Hugmore Lane.*
11. *Installation of improved bus shelters and associated kerbs, flags and lighting at bus stops on Holt Road (A534) - stops Llan-y-Pwll after Hugmore Lane and Llan-y Pwll before Hugmore Lane.*

Internal routes

Safe walking and cycling routes should be provided within the site, providing connections between the access points and the building entrances, avoiding HGV turning areas/loading bays and car parks. A footway is shown on the north side of Unit 1 immediately adjacent to the building, however there is no facility for pedestrians to cross the loading bays.

As with Unit 1, there is no defined internal pedestrian route for drivers parking at the southern end of the site and the building entrance, which is assumed to be in the northwest corner of the building. Improved facilities for pedestrians within the car park should be provided.

Traffic Generation

The anticipated trip generation for the site has been estimated using TRICS, detailed in the Transport Statement, applying standard methodologies. The combined trip generation (2 way trips) for both units are 28 vehicles in the AM peak (08:00-09:00) and 29 vehicles in the PM peak (16:00-17:00) which will access both site access junctions. It is agreed that this level of trip generation will not have a significant impact on the highway network.

As the TS reflects GIA of the previously withdrawn application, and the revised floor areas are slightly lower, it is considered that the assessment is considered to be suitably robust *when assessing this application on it's own*.

Parking

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

The Applicant has applied for both B2 (General Industry) and B8 (Storage and Distribution) uses. The floor area split between these two uses has not been defined. Given that the units could be used for either B2 or B8 land use, the worst case in terms of maximum car parking and minimum cycle parking standards has therefore be assumed.

LPG16 permits a maximum of 1 car parking space per 50sqm for B2 land use and a minimum of 1 cycle space per 500sqm. For B8 land uses, a maximum of 1 car parking space per 100sqm is permitted and a minimum of 1 cycle space per 1,000sqm is required.

The GIA for Unit 1 (northern plot) is 4,339sqm and will provide 52 car parking spaces. For Unit 2 (southern) the GIA is 4,132sqm and will provide 53 car parking spaces.

For a 100% B2 development the maximum number of parking spaces permitted would be 169 spaces therefore the provision of 105 spaces would be in accordance with LPG16 if the site is to be used wholly for B2 use. However, for a 100% B8 development a maximum of 85 spaces would be permitted across the whole site, therefore the provision of 105 spaces would exceed the standards defined in LPG16.

It is noted that the parking accumulation presented in the Transport Statement demonstrates that the level of parking is sufficient for an Industrial Unit development, but no evidence has been provided in relation to B8 use. It is requested that the Applicant provides confirmation of the split of land uses and updates their parking assessment, or reviews the level of parking to be provided.

The layout of the car parks is acceptable, a minimum 6m manoeuvring space should be provided and should be annotated on the plan between the parking spaces to the south of Unit 2 and the southern frontage of Unit 2 itself.

Cycle parking is also proposed in the Transport Statement, with two cycle stores, with a capacity of 10 bicycles each, proposed. This is in line with WCBC standards and is acceptable. The location of the cycle stores should be shown on the Proposed Site Plan and should be conveniently located for cyclists to access the main entrances to the building.

Road Safety

A road safety assessment was undertaken using Crashmap.co.uk for 5 years on Bryn Lane in the local area. It is agreed that the road safety record does not represent a material concern in the context of the proposed development. However, as previously stated, a Road Safety Audit of the proposed access arrangements should be provided, specifically in relation to the northern site access.

Summary

The following additional information/design amendments are requested from the Applicant:

- Justification for why a smaller design vehicle than the maximum legal articulated vehicle has been used; or provides revised swept path drawings based on a 18.55m long maximum legal articulated vehicle.
- Road Safety Audit Stage 1 of the proposed access arrangements to Unit 1 – due to the formation of a crossroads with the HGV parking area access to the north and consideration of the proposed Kingmoor development access arrangements.
- Revised visibility drawings for Unit 1 access, demonstrating visibility splays from the site access to the right.
- A new footway to be provided along the northern site frontage to serve Unit 1.
- An appropriate crossing facility and footway connection on Bryn Lane should be provided to serve both Units 1 and 2.
- Review parking provision or provide details of the proposed split between B2 and B8 uses. The final land use split should be conditioned if approval is granted for the proposed development
- *Consideration of traffic flows in combination with a number of additional significant applications within close proximity to this development. This is a shared action between WCBC Highways and the applicant. Reference to WCBC's list of other schemes to consider is required separately.*

Conclusion

The development is not expected to have a significant impact on the operation of the highway network *on its own, but needs to be considered in tandem with others*. However, further information and design amendments are required in order to make the scheme acceptable from a transport and highways perspective. Consideration of the submitted development proposals on land to the north of the site along Bryn Lane (ref: P/2023/0280 & 0497) amongst others will also need to be addressed, specifically in relation to the Unit 1 site access arrangements.

A handwritten signature in black ink, appearing to read "R. K. W. K.", written in a cursive style.

Chief Officer, Environment & Technical