

I am the councillor for Grosvenor ward, which includes the site under consideration.

There's no doubt there's demand for a McDonalds in the Wrexham County borough area. That's not the issue - it's whether this location is the best place for such an outlet. With that in mind, I'm going to focus on the material planning objections to this proposal.

The main issue is traffic, congestion and the potential for gridlock. The highway department response dated 24/02/2020 (Copy attached as WCBC Highway response 240220) raised a number of concerns to the original planning application for a McDonalds. Some of these have not in my opinion been adequately addressed by the applicant.

Access

The highway officers opening paragraphs in his response:

The proposed development site is located on the Plas Coch Retail Park off Plas Coch Road. The existing road network leading to / serving the retail park already suffers from capacity issues during weekday peak times and at the weekend when significant queuing / delays are experienced.

The existing A483 / A541 junction, Plas Coch roundabout(s) and New Road / Stansty Road junction suffer from capacity issues and would not benefit from any significant increase in vehicle movements.

I would be unable to support any proposed development that will result in any significant increase in vehicle movements at the Plas Coch Retail Park.

In recent years there have been a number of traffic studies undertaken on the A483 junction 5 and the Mold Road Roundabout. The two sites are intrinsically linked by their close proximity and this has been recognised by each of the previous traffic studies.

In March 2016 a traffic study was undertaken by Capita. (Copy attached as Capita Capacity Study March 2016) The report was an independent study commissioned by WCBC to assess future traffic demand on WCBC strategic highway network.

The report concluded that the Junction 5 / Plas Coch Roundabout was already over theoretical capacity and recommended amongst other improvement works that an additional lane was required on the Plas Coch Road approach to Berse Road roundabout.

Figure 6.1 - Junction 5 High Level Improvement Measures



In 2017 Mott McDonald (MM) were commissioned by WCBC planning department to assess the strategic highway network following significant concerns raised by WCBC highway officers in connection the WCBC LDP which was ongoing at the time. (Copy attached as MM TA A483 draft final)

Their conclusion to resolve existing and future highway capacity issues was stated in Paragraph 5.4.2 on page 29

'It is evident from the analysis that in the long term the only solution in terms of junction capacity is the Capita option 2 but this would require significant infrastructure works and land take'

Capita Option 2	Capita Option 1 plus - the provision of additional lanes on each approach arm to Plas Coch roundabout, and an additional lane on Mold Road, exiting from Plas Coch roundabout (eastbound). The provision of an additional third lane on the A483 off-slip (southbound), and an additional land on Mold Road (eastbound approach) to the gyratory.
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It is evident from the two independently commissioned reports that junction 5 and Berse Road Roundabout suffer from existing highway capacity issues which are forecast to get increasingly worse over the next 10 years.

Long term resolutions to these issues require land take and significant investment.

A Welsh Government study was also undertaken at Junction 5 / Berse Road and this too acknowledged significant traffic issues and proposed large scale alterations to the area – this however has not progressed beyond the paper study and any proposed improvements should not be factored into this application as there is no certainty that anything will be done in the next 10 years.

The scheme proposed by McDonalds does nothing to address the existing issues and it is against this back drop of longstanding and serious highway capacity issues that the current planning appeal must be considered.

Since the second transport assessment was completed Plas Coch retail park has seen several incremental developments in recent years that have increased traffic - an expanded supermarket, a new hotel, a drive-thru coffee shop - as well as a new housing development on Glyndwr University campus - recently reduced from 410 to 90 (due in part to the concerns about road capacity).

In addition, Ysgol Plas Coch has expanded in recent years to 315 pupils and that also means increased traffic flows at certain times of the day. There is also a planning application for 450 new houses beyond the school.

Each of the new developments was predicted to generate less than a 5% increase in traffic generation at the Plas Coch / Berse Road roundabouts. The 5% figure is deemed to be a material increase by Welsh government and for that reason Wrexham highway officers never felt they had enough evidence to refuse any of the applications despite their obvious concerns being raised – particularly for the Costa and 450 new houses applications (P/2018/0384 and P/2018/0671 highway responses attached for information)

There is an acknowledgement in the McDonalds Highways assessment that the Berse Road roundabout is already approaching capacity at peak times.

It is of course not surprising that the transport assessment submitted by ADL on behalf of McDonalds concludes that everything will be just fine despite the significant additional traffic being generated by the proposal.

However, the evidence contained within the applicants own report does not support this.

On page 32 Table 5H of the Proof of Evidence Report (Copy attached as Highways McDs Proof of Evidence November 2021) it is notable that the increase in traffic on Plas Coch roundabout as a result of the

McDonalds proposal is quite categorically stated to be 6.2 % at both the Friday peak and the Saturday peak.

Table 5H Traffic Impact Assessment

		2021 Base + Committed Dev	McDonald's Traffic	2021 Total	% Increase
Plas Coch Road Roundabout	AM Peak	1992	+98	2090	+4.9%
	PM Peak	2551	+157	2708	+6.2%
	Sat Peak	2858	+177	3035	+6.2%
Berse Road Roundabout	AM Peak	4011	+71	4082	+1.7%
	PM Peak	4503	+109	4612	+2.4%
	Sat Peak	3952	+137	4089	+3.5%
A483 J5 Roundabout	AM Peak	3841	+3	3844	+0.07%
	PM Peak	4214	+16	4230	+0.3%
	Sat Peak	3696	+34	3730	+0.9%

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Of the three peak periods actually studied within the report, two of them are proven to show a traffic generation increase of more than 5% at the Plas Coch Road roundabout.

It is stated on the same page of the Proof of Evidence that the Welsh Government has a 5% threshold for junctions /roundabouts suffering from existing traffic capacity issues.

By that fact alone the application should be refused, as it is above the 5% figure which the Welsh Government deem to be a material increase in traffic.

As we have already seen in the previous two transport assessments (Capita & MM) the Berse Road roundabout is already at capacity. These were independently commissioned reports and can be relied upon for their impartiality.

The ADL transport assessment has now confirmed the traffic generated at the Plas Coch Roundabout, by the McDonalds proposal, will be greater than the 5% threshold accepted by the Welsh Government.

This threshold is set out in the Welsh Government document TAN 18 on page 55 paragraph E4 (Copy attached as TAN 18)

As a broad guide the Assembly Government would regard an increase in turning movements in the order of 5% as material in most cases, that is, a 5% increase of traffic using any link of the junction.

So, in effect the proof of evidence submitted by the applicant has actually proved that the proposed McDonalds will generate a material increase in traffic to the detriment of the highway network.

Parking Provision

The highway officer raised concerns over the loss of car parking for the existing retail units and also expressed concerns over the amount of car parking provided for the proposed store. It appears that the highway officer and the highway consultants now employed by WCBC are now satisfied with the parking proposals.

This is rather surprising given the highway department's reference to a similar existing McDonalds store at Halton, Chirk – some 7 miles south of the current application.

The store had a total of 53 parking spaces provided at the site but it was found to be well under capacity so an application was made by McDonalds themselves to extend the car park by 100% to 108 spaces.

Planning ref: P/2012/0301 (copy attached as McDonalds Halton planning permission)

For information the proposed car parking plan is also attached at McDonalds Halton Car park extension.

It is interesting to note the following text within the design and access statement within the application documents that was submitted by McDonalds for the car park extension. (Copy attached as McDonalds Halton D&A)

In this instance it is considered that the car park extension will ease congestion within the site making the functioning of the site more effective. Likewise, the provision of additional parking spaces will prevent the possibility of on-street parking within the vicinity, thus having a positive impact on road safety and traffic congestion.

The reasons for the huge car park extension are further reinforced on page 15 of the statement

Vehicle Access

Vehicles will access the site as before but now have the option of turning left into the car park extension or continuing along the access road to the existing car park and drive thru lane.

A total of 108no. car parking spaces are provided in accordance with the authority's parking standards to:

- Ensure that sufficient space is provided within the site and clear of public highways;
- Accommodate all vehicles likely to be attracted to or generated by a proposed development;
- Minimise the dangers to public and highway safety; and,
- Minimise the loss of amenity and convenience likely to be caused by on-street parking

It is important to note that this restaurant already had 53 spaces on site but demand outstripped availability.

At the time of the application, it is worth noting that the Halton restaurant had a floor area of 378 sq.m. This is shown in a planning application for an extension to the restaurant proposed in 2010. P 2010 0603 is attached for your information – the floor area is shown on page 4 section 19 of the application form.

The proposed restaurant in Wrexham has a proposed floor area of 440 sq.m as shown on page 6 part 17 of the application form attached as P 2019 0919. The parking provision proposed for the Wrexham store is just 29 spaces. The stores are just 7 miles apart on the same stretch of the A483 trunk road. The similarities between them are striking but the consultants employed by McDonalds state that there is no resemblance.

Both sites are situated less than 400m from the main A483 Trunk Road and will therefore quite naturally be attractive to potential customers using that road.

The residential population around the Wrexham store is significantly greater than that of the Halton store. There are thousands of potential customers within a 6-mile radius of Wrexham who are far more likely to use the proposed store in Wrexham. There are large villages of significant population size all of whom will travel to the Wrexham store if the application is permitted.

The supposition that just because there are fewer link trips to the Wrexham store means that they don't need as much parking is highly questionable.

There is clear potential for a similar if not greater trip attraction to the proposed Wrexham store and the car park must therefore be capable of accommodating the vehicles attracted. The Halton store has already proved that 53 spaces is not adequate for a store on the A483 – to provide just 29 spaces will potentially cause traffic disruption on the retail park and notably on The Range car park.

The Halton store is 378 sq.m and provides 108 parking spaces.

The proposed Wrexham store is 440 sq.m but provides only 29 spaces.

The imbalance between the two is striking and is of great concern and the application should be refused.

The Design and Access statement for the Halton car park extension which I previously mentioned and which is attached for your information, actually explains to us the positive impacts of providing adequate parking.

It states that a suitably sized car park will:

1. Ease congestion within the site
2. Prevent the possibility of on street parking within the vicinity and have a positive impact on road safety and traffic congestion
3. Ensure sufficient space is provided within the site
4. Accommodate all vehicles likely to be attracted to the site
5. Minimise dangers to public and highway safety
6. Minimise the loss of amenity and convenience likely to be caused by on street parking

So it is safe to assume that without adequate parking that the scheme will cause each and every one of those issues McDonalds were so concerned about at their Halton store. It would be nice to see McDonalds adopt a consistent approach to their parking issues.

Added to the concern over the proposed number of parking spaces for the new store, there is also concern over the loss of parking space for the existing retail units.

A total loss of 70 spaces is hugely significant. At Christmas time free parking spaces are few and far between - unfortunately due to the clever timing of the appeal we are unable to provide images to prove this.

It is of considerable note that just 200m away on the same retail park a planning application P/2022/0102 (Attached as Planning App Demolition of F&B) has just been submitted to demolish the existing Frankie and Bennys retail unit to create additional parking provision on the site. This is relevant to the appeal because it was only three years ago that a new Costa (A3 planning use) was constructed on the retail park causing the loss of existing car parking spaces. (Copy of plan attached as Costa A3 plans) There was a total loss of 24 spaces as a result of the new Costa which was not thought at the time to be crucial. However, it has clearly created an issue as the site owners have now gone to the enormous expense of proposing the demolition of a retail unit in favour of just 17 additional parking spaces.

This indicates that the retail park is far busier and requires more parking spaces than perhaps the McDonalds highway consultants would like to admit to. The loss of 70 spaces and the addition of a new unit with an inadequate number of spaces is a grave concern to the free flow of traffic around the retail park

As already explained there is a significant shortfall in parking provision at the proposed store and this will have a massive knock on effect on the existing car park at the Range / Argos particularly if they have already had a reduction in parking of 70 spaces.

Pedestrian Crossing Facilities

A road safety audit has been undertaken at the site and has identified a number of issues connected to pedestrian safety (Attached as RSA) Of particular note are items 4 and 5 seen below:

4. Items resulting from this Stage 1 Audit Plas Coch Road between the roundabouts

4.1 PROBLEM

Location Pedestrian entrance to restaurant

Summary: Risk of injury to pedestrians

The proposed restaurant will attract customers across Plas Coch Road in the vicinity of the pedestrian entrance. There are no crossing facilities here and the facilities at Plas Coch roundabout are poor. This could result in pedestrians being hit by passing vehicles and injured.

RECOMMENDATION

A pedestrian crossing assessment should be carried out and appropriate crossing facilities provided.

5. Items resulting from this Stage 1 Audit Mold Road roundabout

5.1 PROBLEM

Location – Pedestrian crossing facilities

Summary: Risk of injury to pedestrians

The proposed restaurant will attract customers across Plas Coch Road and Mold Road.

The pedestrian facilities are incomplete, providing controlled crossings of 2 of the 3 signalised entry arms (Mold Road east and Plas Coch Road north) and none of the exit arms. This absence of facilities could lead to injuries to pedestrians from collisions with passing vehicles.

The tactile paving for the crossing of Plas Coch Road is incorrect with the stem on the wrong side of the crossing. Similarly, for the crossing of Mold Road east (exit from roundabout) the layout is also incorrect, using an old T shaped layout which was reserved for Zebra crossings but is no longer used. This could result in visually impaired pedestrians being hit by passing vehicles and injured.

RECOMMENDATION

The correct tactile paving layouts should be provided.

Problem 4 identifies that there is no pedestrian crossing facility across Plas Coch Road and suggests that an appropriate facility is provided.

Problem 5 identifies a lack of pedestrian crossing facilities on 2 of the 3 signalised exit arms but bizarrely does not recommend any improvements. It is disappointing and somewhat surprising that neither the highway officer of the highway consultants employed by WCBC commented on this.

The TA states that the store will attract pedestrians and the risk of injury is noted in the Road Safety Audit (RSA) but the applicant only intends to provide a pedestrian crossing on the Plas Coch Road exit arm. There is clearly a hugely significant issue at the Mold Road east exit arm where pedestrians are faced with significant numbers of vehicles doing speeds of up to 30 mph. It is concerning that the RSA has not picked up this as being a suggested improvement given the significant numbers of pedestrians that the new store will attract.

Given the identified pedestrian risks it is considered that the significant increase in pedestrian numbers created by the proposed restaurant will potentially create additional danger to all users of the highway in particular pedestrians and vulnerable road users.

I also have serious concerns over the impact that the proposed pedestrian crossing on Plas Coch Road will have on the traffic flows at Berse Road roundabout; and the potential knock-on effect at the Mold Road roundabout.

The highways department themselves identified this issue in their first response (attached as WCBC Highway response 240220) to the planning application.

They stated that:

Having spoken with our Traffic Section, I understand that previous requests for a signalised pedestrian crossing along Plas Coch Road have not been supported given the issue of vehicle queuing.

It is therefore remarkable that neither the highway officer or the highway consultants they also employ are simply willing to overlook this issue. Given their previously published comments one can only wonder if they have even checked the predicted impact.

The addition of a crossing point on the Plas Coch Road exit arm off the Berse Road roundabout will add a minimum of 40 seconds into the traffic light sequences at Berse Road. It can't operate alone – it will have to be included in the sequencing due to its close proximity to the signal-controlled roundabout.

The existing system is in a finely balanced equilibrium at the current time. Long queues are experienced at peak hours due to the balancing act of getting traffic through the roundabout from each direction. The signalised junction is operated by a MOVA system to optimise traffic flows - a 40-second increase in that sequencing will cause pandemonium at the roundabout.

I can see no evidence within the applicant's statement of case which clarifies exactly what the impact of those additional 40 seconds will be. It may be there hidden in appendices and diagrams but as a layman I'm afraid it is not something I have experience of interpreting. It would have been beneficial to the public for a paragraph to be included to demonstrate what the impact will be in layman's terms as they have done with the Plas Coch roundabout Arcady predictions.

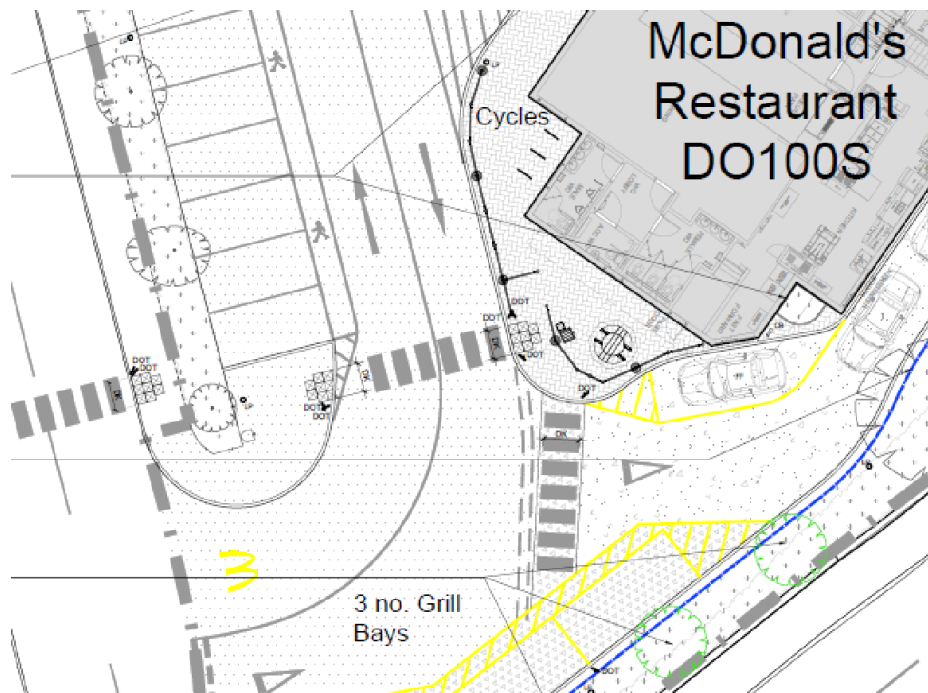
My experience of the Berse Road roundabout is that any additional delays in the traffic light sequence will cause pandemonium.

So, whilst the proposed pedestrian crossing improves pedestrian safety there can be no question that it will also dramatically increase tailbacks. You can't simply put an additional 40-second traffic light sequence

without it detrimentally impacting traffic flows at a roundabout that is already acknowledged to be over capacity. It has been identified in at least two traffic assessments of Berse Road roundabout that traffic is already at capacity at peak times and this proposal will cause significant highway issues.

I also have concerns about the safety of the proposed zebra crossing on the access to the restaurant itself.

I'm surprised that the safety audit hasn't picked up issues with the proposed new zebra crossing directly in front of the new restaurant. It is shown in the middle of the image below just to the left of the restaurant itself.



It's virtually blind to any approaching vehicles as you are driving round a 180-degree bend and coming back on yourself. It's a very dangerous place to cross when vehicles aren't going to see you until very late. Drivers will be focused on the road not on the footways. This could cause significant highway safety issues for pedestrians, who would be at risk of vehicle collision and for drivers who would be at risk of rear end shunts as vehicles behind have to brake sharply when pedestrians are crossing.

OTHER MATTERS

There is opposition on matters of light pollution, littering and anti-social behaviour. McDonalds-branded litter is already a huge problem in my ward and neither I nor residents want any more of it. Cleaning up within 150m of a restaurant (as the report states McDonalds staff do now) ignores the time it takes to eat a McDonalds meal before the cups, bags and cartons are discarded. People discard their cartons when they finish eating and that can be 200m, 250m or more. McDonalds in town is surrounded by McDonalds litter, suggesting that they are not implementing the 150m rule now.

This proposal is for a 24-hour service and there are understandable concerns that an all-night facility would lead to increased anti-social behaviour. Claims by the developer that the car park would be gated off in such an event are unconvincing.

The Highways assessment is also, frankly, contradictory: On page 56 of the original Planning Application it says “the degree to which the proposed restaurant adds to the congestion is negligible and at peak times it is likely that congestion will deter visitors to the restaurant at busy times.”

So, on the one hand, it won’t make much difference but on the other hand, at peak times the congestion is so bad people will stay away. That suggests that we’re already facing severe congestion and that this new planning application would be the tipping point.

PLANNING GUIDANCE NOTE 9

One other key point is that the site is within 400m as the crow flies of Ysgol Plas Coch, a 315-pupil primary school. Wrexham CBC's has long-established planning guidance against allowing fast-food outlets within 400m of a school. Permitting this appeal would undermine WCBC's own guidance on this matter. The problem of obesity and concerns about fast-food intake amongst our children is well established and merits consideration in this appeal.

STATEMENT OF COMMON GROUND

For information, in March 2020 WCBC highway department engaged Mott McDonald transport consultants to assess and respond to any planning applications that were deemed to be too challenging for their own staff. MM is a global organisation with a number of satellite offices around the UK.

They will doubtless have been commissioned to undertake transport assessments in support of various planning applications involving fast-food companies.

In my opinion this represents a clear conflict of interest. They cannot be seen to be resisting planning applications in one area of the country whilst supporting similar projects in another.

I am aware that WCBC highway consultants MM have entered into a statement of common ground on all the points raised but I would respectfully ask the Inspector to challenge the agreed statements.

There have been too many instances in recent years of WCBC's consultants approaching an issue remotely and without the detailed local knowledge that should be part and parcel of any highways assessment. MM do not, as far as I'm concerned, appear to be serving the best interests of the people of Wrexham.

Conclusion

The Highways report to committee also admitted:

“The existing road network leading to and serving the retail park suffers from capacity issues during weekday peak times and at the weekend when significant queuing / delays are experienced. The existing A483 / A541 junction, Plas Coch roundabout(s) and New Road / Stansty Road junction suffer from capacity issues and would not benefit from any significant increase in vehicle movements.”

It is clear that WCBC highway officers had severe concerns over the operation of the highway network in the vicinity of the site. It is therefore of some concern because neither they nor the highway consultants (Mott McDonald) working on their behalf have picked up the issue of the traffic generation being higher than that permitted by the Welsh Government

The Arcady results demonstrate that there will be an increase of 6.2% in traffic generated at the Plas Coch Roundabout by the proposed McDonalds. Welsh Government guidelines state clearly in TAN 18 that a figure of 5% is deemed to be a material increase.

For that reason alone, the application should be refused due to the detrimental impact it will have on the throughflow of traffic in the vicinity of the site.

The Berse Road roundabout has been demonstrated at or near full capacity by two independent transport assessments. The significant extra traffic generated by this proposal will inevitably create further queuing and additional problems to the throughflow of traffic in the vicinity of the site.

The implementation of a pedestrian crossing on the Plas Coch Road will cause a significant additional time sequence into the traffic light MOVA sequencing at the Berse Road roundabout. This will inevitably create significant additional queuing issues at the Berse Road roundabout, creating additional highway capacity issues and will be detrimental to the throughflow of traffic in the vicinity of the site.

The proposed zebra crossing immediately west of the proposed restaurant is a safety hazard due its proximity to a sharp 180-degree bend which will cause the likelihood of additional danger to pedestrians and all road users.

The reduction in numbers of the existing parking areas is considered unacceptable due to the demand on the spaces being so high particularly during busy shopping periods. The loss of spaces will cause unnecessary problems for existing customers and will cause the likelihood of additional dangers to all road users by virtue of cars parking indiscriminately about the site.

The dangers of removing car-parking spaces for an A3 planning use have already been highlighted by the construction of a Costa drive-through on the retail site about three years ago – the evidence being the sudden need to demolish a perfectly good retail unit to construct additional parking spaces to cover the spaces lost when Costa was built.

The proposed parking for the restaurant itself is considered to be significantly short in numbers. A very similar restaurant alongside the A483 less than 7 miles away at Halton recently doubled the size of their car park from 53 spaces to 108. The reason being that 53 spaces simply couldn't cater for the amount of traffic and demand on the parking spaces. There is no difference between the Halton and Wrexham site in terms of location off the A483 – the Wrexham site is however significantly closer to a huge population from local villages which will inevitably lead to demand on the car parking spaces outstripping the paltry 29 spaces being proposed. This proposed development will have 29 parking spaces for McDonalds while its Halton equivalent has 110 – the two restaurants cannot possibly be that different that they one has nearly 80 spaces less than the other. It simply isn't credible. The lack of adequate parking for the restaurant is another reason for the application to be refused due to the detrimental impact it will have on the retail park and the throughflow of traffic in the vicinity of the site.

Given the above, I hope that you will dismiss the appeal by McDonalds.

Yours

Cllr Marc Jones