

**CATHERINE CHAPMAN
PROOF OF EVIDENCE: TRANSPORT ASSESSMENT
WITH REGARD TO THE APPEAL
OF PLANNING DECISION
FOR PROPOSED McDONALD'S RESTAURANT
LAND AT ARGOS CAR PARK
PLAS COCH RETAIL PARK
WREXHAM
LL11 2BW**

ADL/CC/4171/30B

Wrexham Borough Council Ref: P/2019/0919

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1.0 INTRODUCTION

1.1 Qualifications and Experience

- 1.1.1 My name is Catherine Chapman. I am a Master of Science in Transport Planning from the University of West of England. I am also a Bachelor of Science with Honours in Geography from The University of Sheffield. I am a member of the Chartered Institution of Highways and Transportation. I have been professionally engaged in traffic and transportation in the private sector for over fifteen years.
- 1.1.2 I am a Director at ADL Traffic and Highways Engineering Ltd which is a specialised consultancy dealing in traffic engineering, transportation and highway design matters.
- 1.1.3 My experience is primarily with determining and, if appropriate, addressing the changes in transportation activity associated with development and redevelopment proposals within the planning framework, primarily via the preparation of Transport Assessments and Statements for planning applications. Clients for whom I act include a number of commercial and residential developers. I have worked on behalf of McDonald's Restaurants Ltd dealing with transportation matters pertaining to drive thru restaurants for over ten years.
- 1.1.4 I am familiar with the site and surrounding area and the local road network.
- 1.1.5 The evidence which I have prepared and provided for this Appeal in this Proof of Evidence are within my own knowledge and have been prepared in accordance with the guidance of my professional institution. I confirm that the opinions expressed represent my true and professional opinions.

1.2 Planning Background and Highways Reason for Refusal

- 1.2.1 Planning application P/2019/0919 was submitted to Wrexham Borough Council on 12 December 2019 for the erection of a free-standing restaurant with drive thru facilities, car parking, landscaping and associated works on land at Plas Coch Retail Park, Wrexham.

- 1.2.2 The planning application was supported by a Transport Assessment prepared by ADL Traffic and Highways Engineering (December 2019). Consultation comments were received by the Highway Authority dated 24th January 2020. These comments raised issues with; the proposed parking provision and comparable restaurants used for assessment, the car parking survey of Plas Coch Retail Park, servicing arrangements, the inclusion of or the lack of committed development in the Transport Assessment and pedestrian crossing facilities. ADL responded to the Highway Authority by email on 13th February 2020. However, this response was not accepted. Further consultation comments were provided by the Highway Authority dated 27th February 2020. These comments also included the requirement for a Delivery Management Plan and a Stage 1 Safety Audit of the pedestrian environment on Plas Coch Road.
- 1.2.3 Revised transport submissions were submitted to the Planning Authority in December 2020. Including; a Transport Assessment (Volume 2) (December 2020), Delivery Management Plan (December 2020), Stage 1 Road Safety Audit (October 2020) and Designers Response to Stage 1 Road Safety Audit (December 2020).
- 1.2.4 The Transport Assessment Volume 2 (December 2020) included; justification of the traffic and parking surveys used, updated accident analysis, justification of the comparable restaurants used for assessment, assessment of committed and parallel development, justification of the proposed parking provision, traffic modelling assessments for the Retail Park Roundabout, Plas Coch Road Roundabout and Berse Road Roundabout.
- 1.2.5 The Delivery Management Plan (December 2020) includes a commitment to service the restaurant overnight between 8pm-8am to avoid peak trading periods for the McDonald's and wider Retail Park.
- 1.2.6 The Designers Response (December 2020) agreed to all recommendations raised by the Road Safety Audit and measures are proposed to improve pedestrian access on Plas Coch Road including a new signalised pedestrian crossing.
- 1.2.7 The summary from the Highway Authority final consultation comments dated 22nd March 2021 demonstrates that, on the basis of this extensive scope of work all design issues were resolved.

“The TA has taken a reasonable approach to future traffic forecasts and accounting for committed development as requested. The traffic generation estimates for the restaurant itself have been based on analysis of other comparable restaurants and are considered acceptable.

The traffic assessment has shown that while Berse Road roundabout is already experiencing some congestion, the expected additional traffic relating to the proposed restaurant will have a negligible impact. Plas Coch roundabout is approaching capacity and may experience problems in the modelled future year 2036, but the restaurant will have a negligible impact. The Retail Park roundabout will be approaching capacity by 2036 but again, the impact of the restaurant traffic is small. Previous concerns over the validity of the junction modelling have been addressed by validation with observed queue length data.

I am now content that the proposed car parking provision is appropriate and in accordance with the Wrexham County Borough Parking Standards.

Concerns over headlight glare have been satisfactorily addressed.

The Delivery Management Plan has been provided and addressed all concerns regarding deliveries and waste removal.

A Stage 1 Road Safety Audit has identified where improvements are required to pedestrian Crossings and the findings incorporated into the proposal. The highway improvements set out in the Designers Response to the RSA must be undertaken before the restaurant begins trading.

Accident analysis has been undertaken and has confirmed that there are no highway issues that would be directly exacerbated by the development.”

1.2.8 There was consequently there was no objection to the planning application by the Highway Authority.

1.2.9 The Welsh Government also raised no objection to the application. This was summarised in the Committee report dated 1st June 2021 (pages 54-55). The Welsh Government are progressing highway improvement designs to the A483 Roundabout.

“Following on from recent capacity assessments by Capita and Mott McDonald the Welsh Government are currently undertaking their own capacity assessments to identify preferred options which will include mitigation proposals for the Stansty development site. Given the proximity of the site and potential implications for the A483 (T), the highway authority considered it appropriate for the views of the Welsh Government / NMWTRA to be sought on the proposals.

The views of WG have now been sought and the response confirmed that there were no WG directions to be issued or comments to make. It is noted that the Minster has made a formal announcement confirming that next stage of the A483 Junction 3-6 improvements is to be progressed. WG has confirmed that it is now currently procuring designers to progress Junction 4 through the preliminary design and statutory process, and Junctions 3, 5 & 6 through to completion of detailed design."

1.2.10 As of October 2021 the Welsh Government improvements for the A483 are subject to independent review. Further details on the proposals and situation are provided in Section 3.2.

1.2.11 The application was recommended for approval by the Planning Authority. The conclusion of the Committee report (page 65) in relation to highways was that the parking provision was acceptable and that the proposed traffic generation would not be significant and the traffic impact of the development would be negligible.

"The highway authority has confirmed that the level of parking provision for the proposed restaurant and existing retail units is acceptable to serve the users of the site, and that safe vehicular and pedestrian access has been secured. The increased in traffic generation is not significant and is considered to be negligible in terms of its impact upon the existing highway network."

(The underlining is in the original)

1.2.12 Notwithstanding the agreement with the Highway Authority on transportation matters and their independent assessment that the proposals were acceptable, the planning application was refused by Members on 7th June 2021. Reasons 1 and 2 relate to highways reasons. The opinion of the Planning Committee members was that the development is not acceptable due to impact on network capacity and loss of car parking.

1. *"The existing highway network leading to and serving the Plas Coch Retail Park suffers from capacity issues during the weekday peak times and at the weekend when significant queuing/delays are experienced. The proposed development would exacerbate the existing problems and result in further traffic congestion to the detriment of the free flow of traffic on the highway. To allow the development would be contrary to Policy GDP1 (d) of the adopted Wrexham Unitary Development Plan."*

2. *The proposed development would result in the loss of 70 parking spaces which serve the existing retail uses. This reduction in parking would result in a significant shortfall of spaces available and would fail to provide sufficient off-street parking to meet the existing*

retail demand, contrary to Policy T8 of the adopted Wrexham Unitary Development Plan and the adopted Local Planning Guidance Note No. 16 - Parking Standards.”

1.2.13 The reasons for refusal are completely at variance with and contrary to the Highway Authority’s professional officers technically assessed opinion that the proposed traffic would have a *“negligible impact”* and that the *“proposed car parking provision is appropriate and in accordance with the Wrexham County Borough Parking Standards”*.

1.2.14 Further more Reason 1 is contradictory within itself. The reason cites that the network experiences *“significant queuing/delays”* and yet this is contrary to the claim that there would be detriment to *“free flow of traffic”*. Free flow conditions simply do not exist on a controlled network so this clearly shows the lack of technical understanding by the Planning Committee Members in raising this reason for refusal.

1.3 Statement of Pre-Appeal Facts

1.3.1 At the time of completing my Evidence a Statement of Pre-Appeal Facts has been sent to the Planning and Highway Authority (and their consultants Mott MacDonald) which has agreed a substantial amount of the technical information relating to this case.

1.4 Purpose and Scope of Evidence

1.4.1 The purpose of the evidence is to demonstrate that there is no technically justifiable reason why the application should have been refused on transportation grounds and that the conclusions of the Highway Authority were soundly made.

1.4.2 Chapter 2.0 describes the site and surrounding area. Details are provided of the traffic and parking surveys which have been undertaken and the base line situations for assessment. A review of the existing highway safety situation is provided.

1.4.3 Chapter 3.0 provides a review of the findings associated with Local Plan local network studies and adjacent development proposals. The highway improvements which are proposed by the Welsh Government are also explained.

1.4.4 Chapter 4.0 sets out the development proposals in terms of; layout, operation and trip generation.

- 1.4.5 Chapter 5.0 assesses the traffic impact of the development. The junction modelling has been undertaken of the Retail Park Roundabout, Plas Coch Road Roundabout, Berse Road Roundabout and A483 Junction 5 Roundabout.
- 1.4.6 Chapter 6.0 assesses the parking impact of the development. The results of three separate parking surveys are provided and analysed.
- 1.4.7 Chapter 7.0 explains the sensitivity assessments which have been built into the modelling assessments and why they are likely a worst case. The proposed traffic generation has also been tested to demonstrate that the conclusions based on traffic are robust.
- 1.4.8 Chapter 8.0 presents the opinions of the Council with regards to similar issues of junction capacity and parking at other local development sites which are inconsistent with the determination of the McDonald's application.
- 1.4.9 Chapter 9.0 assesses the first reason for refusal.
- 1.4.10 Chapter 10.0 assesses the second reason for refusal.
- 1.4.11 Chapter 11.0 assesses the national planning policy guidance and relevant local planning policy guidance not included in the reasons for refusal.
- 1.4.12 Chapter 12.0 summarises and concludes the report.
- 1.4.13 The Appendices are provided as a separate document.

2.0 SITE LOCATION, BASELINE TRAFFIC AND PARKING SITUATION

2.1 Site Location and Surrounding Road Network

2.1.1 The site is located 1.6km to the northeast of Wrexham town centre as shown on the plan in Appendix CMC 1.1. The site is triangular in shape located in the eastern corner of the existing Argos/Iceland/The Range car park which forms part of the Plas Coch Retail Park. The site is situated between the Retail Park Roundabout and the Plas Coch Roundabout. The eastern site boundary is formed by Plas Coch Road (B5101) and the western boundary is the Access Road into the Argos/Iceland/Range car park.

2.1.2 The main Retail Park to the north of the Argos/Iceland/Range comprises of a Sainsbury's foodstore and petrol filling station, an Aldi foodstore, a number of non-food retail units and a Costa coffee shop with drive thru facility. There is also the Plas Coch public house.

2.1.3 The site and surrounding area is shown on the plan included as Appendix CMC 1.2.

2.1.4 There is currently only one instore McDonald's restaurant in Wrexham as set out in Section 2.6 of ADL Transport Assessment December 2019.

2.1.5 There are four roundabouts within the vicinity of the site which are considered to comprise of the existing highway network leading to and serving the Plas Coch Retail Park as follows:

1) Retail Park Roundabout (internal)

Four arm roundabout which serves the site and Argos/Iceland/The Range car park, the Sainsburys and Retail Park.

2) Plas Coch Road Roundabout

Four arm roundabout which serves the Plas Coch Retail Park, Plas Coch Road (B5101) and the Wrexham Glyndwr University. This roundabout is located 50m south of the Retail Park Roundabout.

3) **Berse Road Roundabout**

Four arm partially signalised roundabout with Mold Road (A541), Berse Road (B5101) and Plas Coch Road (B5101). This roundabout is located 148m west from the Plas Coch Roundabout. The Mold Road and Plas Coch Road approaches to this roundabout are signalised. The Berse Road approach operates on a priority basis. There are two internal signalised stop lines within the circulatory carriageway.

4) **A483 Junction 5 (Mold Road Interchange)**

Five arm, large, grade separated, partially signalised roundabout. This junction is 120m wide by 163m in length. The A483 northbound and southbound slip road approaches and A541 Mold Road North approach are signalised. The A451 Mold Road South and Summerhill Road approaches operate on a priority basis. There are two signalised stop lines within the circulatory carriageway of the roundabout.

2.1.6 The Retail Park Roundabout, Plas Coch Road Roundabout and Berse Road Roundabout and linking network are subject to a 30mph speed limit. The A483 and A483 Junction 5 is subject to the national speed limit (70mph).

2.1.7 The A483 Junction 5 and the Berse Road Roundabout operate as part of a MOVA signal controlled system which optimises the operation of the junctions in response to traffic flows.

2.1.8 The Retail Park Roundabout and Plas Coch Roundabout have been designed so vehicles stop and give way so that traffic can negotiate the junctions safely. The Berse Road Roundabout and A483 Junction 5 are also designed with signals to hold and release vehicles through the junction in a deliberate manner. Therefore, queues are an integral design feature of the network surrounding the site. There are no free flow traffic conditions which occur on the section of the road network under consideration.

2.2 Surveyed and Base Traffic Situation

Traffic Surveys

- 2.2.1 Traffic surveys have been undertaken of the Retail Park Roundabout, Plas Coch Roundabout (Friday 17th May and Saturday 18th May 2019), Berse Road Roundabout and A483 Junction 5, (Friday 13th March and Saturday 14th March 2020). Details of the surveys are provided in Chapter 2.0 of ADL Transport Assessment December 2020. The peak hours recorded at the junctions are summarised in Table 2A below. For the purposes of providing a robust assessment the peak traffic flows for each set of junctions have been assessed as the 'peak situation'. The overall peak is the weekday Pm peak.

Table 2A Roundabout Peak Hours

	Retail Park & Plas Coch Roundabouts	Surveyed Flows ^{*1}	Berse Road Roundabout and A483 J5	Surveyed Flows ^{*2}
Weekday AM Peak	09:00-10:00 hours	3453	08:00-09:00 hours	7710
Weekday PM Peak	16:00-17:00 hours	4512	16:00-17:00 hours	8571
Saturday Peak	12:00-13:00 hours	5248	12:00-13:00 hours	7481

Note ^{*1} see Table 7A ADL TA December 2019

Note ^{*2} see Appendix CMC 2.1

- 2.2.2 The surveyed flows are included as Appendix CMC 2.1.

Queue Surveys

- 2.2.3 Queue surveys were undertaken at the Retail Park, Plas Coch Road and Berse Road Roundabouts. The details are provided in Sections 7.2 of ADLs TA December 2019 and Section 2.2 of ADL's TA Volume 2 December 2020. For ease of reference the Tables have been extracted from the reports and included in Appendix CMC 3.0. Queue surveys were also undertaken at the A483 Junction 5 Roundabout in March 2021 (at the same time as the traffic surveys). The results are included in Appendix CMC 3.0.
- 2.2.4 On average there were only 1 or 2 vehicles queuing in each lane on the approaches to the Plas Coch Road and Retail Park Roundabouts.

2.2.5 The Berse Road Roundabout is a larger roundabout with traffic signals which create greater queues as would be expected at this type of junction. The queues recorded during the Friday Pm peak on Berse Road are as shown in Table 2B below. The survey recorded whether the queues cleared the junction in the green phase on the signalised approaches. The survey demonstrates that this was the case for the majority of cycles. There were intermittent longer queues (+20 vehicles) recorded on Berse Road (max queue recorded) but these were intermittent and were reported to clear within the same 5 minute interval.

Table 2B Queue Survey Results Berse Road Roundabout: PM Peak

	Mold Road (NW)			Mold Road (SE)			Plas Coch Rd (NE)			Berse Road(SW)			
	Lane			Lane			Lane			Lane			
	1	2	3	1	2	3	1	2	3	1	2	3	4
Min Q	1	0	0	0	0	0	0	0	0	0	0	0	0
Max Q	14	10	8	20	25	7	6	13	13	4	20+	20+	3
Ave Q	6	4	4	6	8	2	2	7	4	1	9	4	1
Cleared	58/58	58/58	58/58	51/58	48/58	58/58	59/59	59/59	59/59	-	-	-	-

2.2.6 The average queues recorded at the A483 junction were only a few vehicles in each lane on each approach to the junction. The queues on the signalised approaches were recorded as clearing on every cycle.

2.2.7 It is concluded that there is queueing which occurs on the surrounding network as the network is purposefully designed to generate. However, these queues are not currently significant or problematic.

Committed Development/Traffic Growth Assumptions

2.2.8 The traffic from the following committed and parallel developments shown in Table 2C has been included within ADL's traffic assessment. Full details are included in Chapter 3.0 of ADL TA Volume 2 (December 2020). A plan showing the location of the committed developments is included as Appendix CMC 4.0.

Table 2C Committed & Parallel Developments Identified by Wrexham Council

Planning Ref:	Status	Development
P/2018/0671	Committed	Construction of 410 1 / 2 bed apartments, Plas Coch Road, Wrexham
P/2018/0672	Committed	Erection of 197 student apartments, Crispin Lane, Wrexham
P/2018/0357	Committed	Extension of Plas Coch Public House (24 bed lodge), Plas Coch Retail Park, Wrexham
P/2018/0384	Committed	Drive Thru Coffee Shop, Plas Coch Retail Park, Plas Coch, Wrexham
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

2.2.9 The assessment years which have been analysed are 2021 (year of opening- now expected to be 2023 due to Appeal) and 2036. The committed development has been assessed as follows:

- 2021 Costa and hotel operating (non-residential committed development)
- 2036 All committed (and parallel) development constructed

The committed development traffic flows are included in Appendices CMC 2.2 and 2.3.

2.2.10 The application of TEMPRO/NTM growth factors has been carefully considered (see Section 3.6 of ADL TA Volume 2 December 2020. It was concluded that the application of 17-18% growth plus the committed development traffic would result in a significant level of double counting. However, as a sensitivity test a 2036 TEMPRO base has been assessed with the applied growth factors. The 2036 base sensitivity traffic is therefore a worst-case scenario. I explain this further in Section 7.1.

2.2.11 As I will demonstrate in Section 7.1 the level of background growth on the local network has been static since 2013. Consequently the 2021 base situation represents the opening year scenario.

2.2.12 The flowing traffic flows are included in Appendix CMC 2.0 have been taken from ADL Transport Assessment Volume 2 (December 2020) and have been updated to include the A483 Junction 5 traffic flows. The flow diagrams provided are:

- 2021 Base Traffic Flows
- 2021 Base + Non-residential committed development (Year of opening likely traffic situation)
- 2036 Base (2021 Base + All committed development - 8% uplift)
- 2036 Base Sensitivity (TEMPRO sensitivity test - 17/18% uplift)

2.2.13 The Highway Authority consultation comments dated 22nd March 2021 concluded ADL's approach of assuming limited background growth and accounting for committed development was appropriate

"The TA has taken a reasonable approach to future traffic forecasts and accounting for committed development as requested."

2.3 Highway Safety Situation

2.3.1 Accident analysis was undertaken in Section 2.4 of ADL's Transport Assessment Volume 2 (December 2020). There were 14 personal injury accidents recorded in the 5 years assessment period for the area covering the Retail Park Roundabout, Plas Coch Road Roundabout, Plas Coch Road and the Berse Road Roundabout.

2.3.2 The Highway Authority concurred with ADL's assessment that:

"From the information provided, there would not appear to be any issues that would be directly exacerbated by the development" (page 55 McDonald's Committee Report)

2.3.3 Further to the assessment provided as part of the planning application I have assessed the level of accidents which would typically be expected to occur at the Berse Road Roundabout and the Plas Coch Road Roundabouts using the methodology contained in the National Highways, COBA (2020) Manual. A copy of the assessment is included in Appendix CMC 5.0. The calculated expected level of accidents is 3 per year at each roundabout i.e., 15 accidents per junction or 30 accidents in total over 5 years. The level of accidents which has actually occurred (14) is therefore low by comparison. This further supports the conclusions of the Transport Assessment and the Highway Authority.

2.3.4 Pedestrian safety within the vicinity of the site has been independently assessed through a Stage 1 Road Safety Audit and all matters raised have been addressed. I provide full details of this in Section 4.2.

2.3.5 There are therefore no further or outstanding highway safety issues which need to be addressed.

2.4 Existing Parking Provision

2.4.1 The existing car park in the vicinity of the proposal comprises of 235 total customer spaces (including 6 accessible spaces and 4 parent and child spaces). The existing car park layout is shown on the plan in Appendix CMC 6.0. The existing car park is subject to a 3 hour maximum stay (1.5 hours on match days). The part of the car park proposed to be redeveloped comprises of 70 spaces.

2.4.2 Overall in the whole Retail Park there are approximately 1300 spaces.

2.5 Parking Surveys

2.5.1 Parking surveys were undertaken at the Retail Park on Friday 17th May 2019 16:00-19:00 hours and Saturday 18th May 2019 11:00-15:00 hours as set out in Section 7.1 and 7.4 of ADL TA December 2019. The results are summarised in Appendix CMC 7.0.

2.5.2 The Highway Authority have also accepted that the traffic surveys undertaken during 'normal' trading conditions are appropriate.

The highway authority originally indicated that any parking survey should be carried out in the first few weeks of December leading up to Christmas on a Saturday and Sunday when the car park is likely to experience peak occupation or even during the Easter holidays. However, the traffic surveys undertaken on a Friday and Saturday in May cover the likely highest flows during a neutral month. (Page 52 McDonald's Committee Report)

2.5.3 To support this Appeal further parking accumulation surveys were undertaken on Friday 9th July 2021 and Saturday 10th July 2021 and Friday 24th and Saturday 25th September 2021. Both surveys were undertaken between 16:00-19:00 hours on Fridays and 11:00-15:00 hours on Saturdays. The results of these surveys are also included in Appendix CMC 7.0. The surveys have been undertaken during school term time and 'normal' trading conditions.

2.5.4 The peak results from the three surveys are summarised in Table 2D below.

Table 2D Peak Parking Survey Results (Total Car Park 235 spaces)

	May 2019		July 2021		September 2021	
	Peak Demand	% Occupied	Peak Demand	% Occupied	Peak Demand	% Occupied
Friday	68	29%	61	26%	63	27%
Saturday	138	58%	95	40%	124	53%

2.5.5 The results demonstrate that the busiest period occurred in May 2019 during the Saturday peak when 138 spaces (58%) were occupied and 97 spaces were available. The results of the subsequent parking surveys demonstrate lower levels of parking demand therefore the analysis provided within the TA December 2020 is conclusively demonstrated to be robust.

2.5.6 The part of the car park (70 spaces) which forms the application site is currently lightly used as shown in Table 2E below. This is why it is considered that this part of the car park is suitable for redevelopment.

Table 2E Peak Parking Survey Results (Application Site: 70 Spaces)

	May 2019		July 2021		September 2021	
	Peak Demand	% Occupied	Peak Demand	% Occupied	Peak Demand	% Occupied
Friday	8	11%	6	9%	9	12%
Saturday	19	27%	9	12%	11	16%

2.6 Pedestrian Surveys

2.6.1 Pedestrian surveys were undertaken on Friday 24th September 2021 and Saturday 25th September 2021 to record the number of pedestrians walking to/from the Retail Park. The results are included in Appendix CMC 8.0 and are summarised in Table 2F below.

Table 2F Pedestrian Flows Plas Coch Retail Park

	Time	In	Out
Friday	08:00-09:00	4	1
	16:00-17:00	8	12
	17:00-18:00	5	5
	18:00-19:00	10	1
Saturday	11:00-12:00	14	2
	12:00-13:00	9	13
	13:00-14:00	9	5
	14:00-15:00	10	6

2.6.2 The pedestrian flows in and out of the Retail Park were:

- Am Peak 08:00-09:00 hours 5 pedestrians (two-way)
- Pm Peak 16:00-17:00 hours 20 pedestrians (two-way)
- Saturday Peak 12:00-13:00 hours 22 pedestrians (two-way)

3.0 THIRD PARTY STUDIES AND PROPOSED HIGHWAY IMPROVEMENTS

3.1 Third Party Studies of Local Road Network

- 3.1.1 There have been a number of studies which have been undertaken of the local road network in association with the Local Plan, local network and other development the vicinity of the site. A summary is provided in Appendix CMC 9.0.
- 3.1.2 Wrexham Borough Council appointed consultants in March 2016 and July 2017 to undertake studies as part of the evidence base for the Local Development Plan 2 (2013-2028). These studies were undertaken by Capita (Wrexham Road Network Capacity and Improvement Study March 2016) and Mott MacDonald (A483 Wrexham Junction 4 and 5 Corridor Study 2 July 2017). Both these studies were LINSIG analyses of the A483 Junction 5 and Berse Road Roundabouts and identified that there were capacity issues at the junctions during the peak periods and that both junctions would require improvement to accommodate the allocated Local Plan development traffic. As I will explain in Section 3.2 both these studies have now been superseded by the Mott MacDonald WeITAG Stage 2 study.
- 3.1.3 Capacity assessments were also undertaken by ITP (in support of application P/2018/0671, 410 flat University site) and Focus Transport Planning (in support of application P/2019/0923, 455 houses Mold Road).
- 3.1.4 The conclusion of the ITP report was that although there would be potential queueing at the A483 Junction 5 and Berse Road Roundabout the 410 flats (including the 197 student flats at the University) would not make a significant difference to the 2035 base year situation. The modelling of the Plas Coch Road Roundabout concluded that overall the roundabout would operate well and any potential queues on the University Access were unlikely to materialise as drivers would simply disperse across the site to the Crispin Lane Access.

3.1.5 The Focus Transport Planning TA (December 2019) concluded that mitigation measures would be required to address the traffic impact of the 455 residential units off Mold Road at both the A483 Junction 5 and Berse Road Roundabouts. These would include signalisation of the Mold Road approach to the A483 Junction 5 Roundabout and alterations to lane and carriageway markings at both roundabouts. Copies of the proposed improvements are included in Appendix CMC 10.1. The Welsh Government comments on the Mold Road residential application dated 31st January 2020 are included as Appendix CMC 10.2. The Welsh Government has raised no highways objection to the application subject to the detailed design and implementation of the improvement measures at the roundabouts. Wrexham Highway Authority consultation comments dated 26th February 2021 are included in Appendix CMC 10.3. The Highway Authority have also raised no objection to this application.

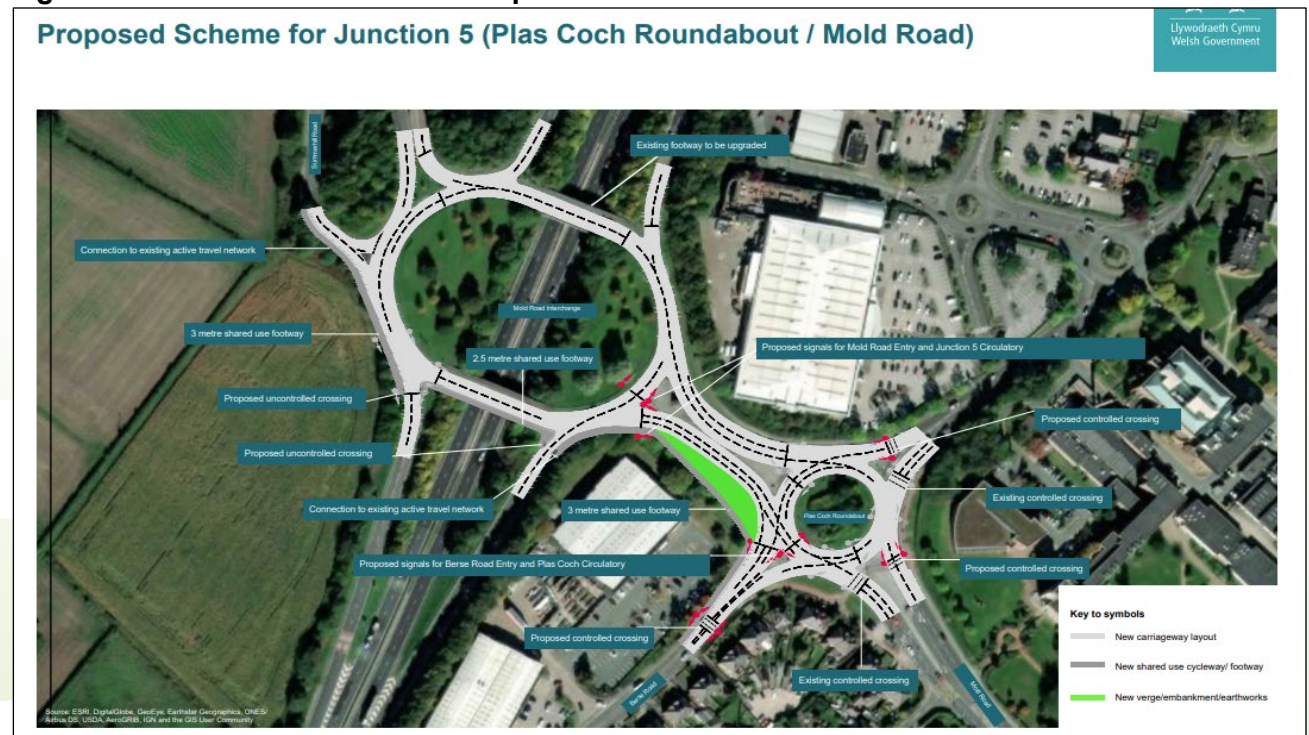
3.1.6 In summary the Capita (2016) and Mott MacDonald (2017) studies of the A483 Junction 5 and Berse Road Roundabout had concluded that there are capacity issues which need to be addressed to facilitate the Local Development Plan allocation traffic by the end of the Local Plan period 2028-2035. This is required in any event and not as a result of the McDonald's application. The studies previously undertaken by Capita and Mott MacDonald are now superseded by the Welsh Government WelTag 2 appraisal and proposals as I explained in Section 3.2. The assessment of the University development concluded that it would not have a material impact on the operation of the road network. Suitable mitigation is expected to be implemented to address any impact from the Mold Road residential development should it be permitted.

3.2 Welsh Government Proposed Junction Improvements

3.2.1 The National Transport Finance Plan 2017 and 2018 Updates include the A483 Wrexham Bypass Junctions 3-6 Improvements as a scheme to be developed as part of the Pinch Point Programme. Moving North Wales Forward, published in March 2017, also includes a commitment to improve the A483 between Junctions 3 and 6.

- 3.2.2 The Welsh Government are currently progressing the proposals through the Welsh Transport Planning Appraisal Guidance 2017 (WelTAG 2017) process. This is based on a SATURN model produced by Mott MacDonald which covers the A483 corridor from Junctions 3 to 6. The latest WelTAG 2 report on which the current proposals have based has to date not been published.
- 3.2.3 Consultation on the proposals was issued in August 2020. A copy is included as Appendix CMC 11.1. This states that a total of 56 options were initially identified which covered a variety of themes. Through a process of engineering, transport and environmental appraisal, and consultation with key stakeholders, preferred scheme options were selected which best deliver the scheme objectives. The preferred package of schemes would improve access into Wrexham, improve journey times and provide new active travel links for local residents. The proposals being presented can be constructed and delivered with minimal impact on existing traffic.
- 3.2.4 The proposed improvements for Junction 5 and the Berse Road Roundabout are shown in Figure 2A below. These include Active Travel Improvements to both roundabouts and signalisation of the Mold Road (South) approach to the A483 Junction 5 Roundabout.

Figure 3A Welsh Government Improvements A483 Junction 5 Roundabout



3.2.5 The Mott MacDonald analysis has concluded through the SATURN modelling that if the existing signalised A483 Junction 4 is closed and a new roundabout constructed to the south, then this junction will operate more efficiently than the existing junction. Road users who have previously used the A483 Junction 5 would transfer to the improved Junction 4. Therefore, less extensive traffic capacity improvements at the A483 Junction 5 are justified compared to those previously proposed in the Capita (2016), Mott MacDonald (2017) studies.

3.2.6 The Welsh Government Consultation-Summary of Responses report (March 2021) is included in Appendix CMC 11.2. The proposals are fully supported by Wrexham Borough Council.

3.2.7 The Planning Authority advised in the McDonald's Committee report (page 54) that;

“the Welsh Government are currently undertaking their own capacity assessments to identify preferred options which will include mitigation proposals for the Stansty development site.”

(ADL Note: Stansty development site = Mold Road residential scheme 455 units)

It may be through the course of the detailed design that there is some minor variation between the scheme proposed by Focus Transport Planning and that determined by the Welsh Government.

3.2.8 On 15th September 2021 the Welsh Government announced that the project is currently being considered as part of an independent panel review with the aim to reduce journeys taken by private car and increase the number of people, walking, cycling and using public transport.

4.0 PROPOSED DEVELOPMENT

4.1 Proposed Development Details

- 4.1.1 It is proposed to provide a 440sqm (GIA) 472sqm (GEA) restaurant with drive thru facilities. The public floor area would be 111sqm (91sqm dining area, 20sqm queue and order area) with 95 seats. A copy of the planning layout is included as Appendix CMC 12.0.

4.2 Access Arrangements and Pedestrian Improvements

Vehicle Access

- 4.2.1 Customer vehicle and delivery vehicle access to the restaurant would be via the Retail Park Roundabout (internal) and the Access Road which serves the Argos/Iceland/Range car park. The entrance to the McDonald's site is 56m from the roundabout and the entrance from the drive thru lane is 111m from the roundabout.

Pedestrian Access

- 4.2.2 Pedestrian access would be provided from the footways on Plas Coch Road and the Access Road to the site. There would be zebra crossing links across the Access Road from The Argos/Iceland/Range car park to the restaurant.
- 4.2.3 Stage 1 Road Safety Audit (October 2020) and Designers Response to Stage 1 Road Safety Audit (December 2020) were submitted with the planning application. The Road Safety Audit was requested by the Highway Authority to specifically review pedestrian access and safety in the vicinity of the site. All recommendations raised have been addressed. The proposed improvements are shown on the plan in Appendix CMC 13.0. These include a new signalised pedestrian crossing on Plas Coch Road and improvements to the drop kerbs and tactile paving at the Plas Coch Road and Retail Park Roundabouts. These proposed improvements accord with the Welsh Government's strategy to improve active travel at the A483 Junction 5 and Berse Road Roundabouts.

4.3 Parking Provision

- 4.3.1 It is proposed to provide 29 spaces for the McDonald's including 2 accessible spaces and 3 reserve bays for drive thru customers. McDonald's customers would also have rights to park in the Argos/Iceland/The Range car park.
- 4.3.2 The proposal would provide 194 spaces (total) for the Argos/Iceland/Range and McDonald's customers as shown on the plan in Appendix CMC 14.0. This is an overall difference of 41 spaces as shown in Table 4A below. The difference in the Argos/Iceland/Range parking provision is a reduction of 70 spaces.

Table 4A Difference Existing and Proposed Parking Provision

		No of spaces	Difference to Existing Situation
Existing	Argos/Iceland/Range	235	
Proposed	Argos/Iceland/Range	165	-70
	McDonald's	29	
	Total	194	-41

- 4.3.3 I have demonstrated in Table 2D that the maximum demand by existing Retail customers was 138 spaces and can therefore be accommodate. I address the parking impact of the development and reason for refusal relating to parking in Chapters 6.0 and 9.0 respectively.
- 4.3.4 The existing car park customer restrictions of 3 hour maximum stay (1.5 hours on match days) would also apply to the McDonald's car park.

4.4 Deliveries

- 4.4.1 A Delivery Management Plan (December 2020) was submitted with the planning application. Deliveries would unload from within the McDonald's car park using an 11.1m rigid delivery vehicle. Deliveries would be scheduled to occur only overnight between 20:00-08:00 hours.
- 4.4.2 The Highway Authority comments dated 22nd March 2021 confirmed that the proposed delivery strategy would have no impact.

"A Delivery Management Plan has now been submitted and confirms that deliveries and waste removal can be carried out safely and outside of peak hours to avoid disruption to traffic."

4.5 Drive Thru Lane

- 4.5.1 The proposed drive thru lane has capacity to accommodate up to 13 vehicles as shown on the plan in Appendix CMC 15.0. The drive thru lane benefits from three reserve bays and a Fast Forward Booth (which operates as an effective 4th reserve bay). These facilities allow the restaurant to manage the drive thru queue and minimize delays as large orders can be directed to one of these bays and the meal delivered by a member of staff.

4.6 Traffic Generation

- 4.6.1 The level of McDonald's traffic generation has been based on surveys of three comparable McDonald's restaurants located in Retail Parks (Darlington 5th/6th May 2017, Bradford 12th/13th May 2017 and Plymouth 26th/27th April 2013) as set out in Section 5.1 of ADL's Transport Assessment Volume 2 (December 2020).
- 4.6.2 A summary of the McDonald's survey information is included as Appendix CMC 16.0. The proposed McDonald's trips by type are summarised in Table 4B below.

Table 4B Proposed Trips By Type

Trip Type	%	Friday AM Peak		Friday PM Peak		Saturday Peak		
		In	Out	In	Out	%	In	Out
Additional	46%	32	32	51	52	23%	27	29
Pass By/ Diverted	28%	20	20	32	33	59%	70	75
Shared	25%	18	18	28	28	18%	22	24
Total	100%	70	70	111	113	100%	119	128

- 4.6.3 The Highway Authority comments dated 22nd March 2021 accepted the level of proposed traffic generation.

"The traffic generation estimates for the restaurant itself have been based on analysis of other comparable restaurants and are considered acceptable."

- 4.6.4 The total McDonald's trips from Appendix 13.0 of ADL TA Volume 2 (December 2020) are replicated in Appendix CMC 2.8.

4.6.5 Due to the COVID 19 pandemic, I have checked the current validity of the pre COVID surveyed traffic at the comparable restaurants. I have obtained transaction data for Friday 17th and Saturday 18th September 2021 (typical neutral weekend). This was compared to the average transactions recorded at the times of the traffic surveys. The results are shown in Table 4C below. The average level of transactions recorded in 2021 was either similar or slightly lower particularly on the Saturday. It should be noted that transactions are usually slightly higher than surveyed trip levels due to repeat purchases and separate payments within groups. It is concluded that the traffic assessment figures based on the comparable restaurants are valid and robust.

Table 4C Average Transactions and Traffic Darlington/Bradford/Plymouth

		Average Transactions Recorded During Traffic Surveys	Average Traffic Surveyed	Average Pedestrians Surveyed	Average Total Trips	Average September 2021 Transactions
Friday	16:00	126	100	15	115	137
	17:00	146	111	25	136	147
	18:00	144	105	26	131	118
Saturday	11:00	106	80	30	110	109
	12:00	177	127	30	160	138
	13:00	177	119	33	152	140
	14:00	151	116	22	138	113

4.7 Parking and Drive Thru Demand

4.7.1 Based on the average of the surveys at the three comparable restaurants. The maximum McDonald's parking demand would be 22 vehicles on a Friday Pm and 28 vehicles on a Saturday (see Section 6.2 ADL TA December 2019). The maximum drive thru queue would be 11 vehicles on a Friday and 10 vehicles on a Saturday (see Section 6.3 ADL TA December 2020). This data was accepted by the Highway Authority.

4.8 Pedestrians

4.8.1 The proposed pedestrian trips have been taken from Section 6.1 of ADL TA December 2019. Most customers typically arrive in family and friendship groups rather than as individuals. McDonald's have advised that the typical group size of customers is 2.4. I have therefore also calculated the number of pedestrian groups as set out in Table 4D below.

Table 4D Proposed Pedestrian Trips

	Peak Hour	Pedestrian Numbers		Pedestrian Groups	
		In	Out	In	Out
Friday	08:00 - 09:00	15	15	6	6
	17:00 – 18:00	25	25	10	10
Saturday	13:00 – 14:00	33	45	14	19

- 4.8.2 It is expected that some of these trips would originate from the Retail Park and some from the surrounding road network. There are measures proposed to improve the pedestrian facilities to access the site as explained in Section 4.2.

4.9 McDeliveries

- 4.9.1 There is an existing McDelivery service in Wrexham which currently operates from the town centre instore. The effect of the proposed restaurant would be to transfer some of these deliveries to ease pressure on the instore and reduce traffic levels within the town centre. McDonald's have advised that they expect 25% of the existing Wrexham McDeliveries to transfer to the Plas Coch restaurant. I have therefore obtained transaction data for the instore restaurant for Friday 24th and Saturday 25th September 2021 (neutral term time weekend when Wrexham University open) and used these to calculate the expected level of McDeliveries at the proposed restaurant.

- 4.9.2 The results are included in Appendix CMC 15.0 and are summarised in Table 4E below. These trips tend to substitute customers which may have otherwise visited the restaurant and therefore as demonstrated in Section 4.6 the overall level of traffic generated is not affected.

Table 4E Proposed Transferred McDelivery Trips

	Peak Hour	McDeliveries
Friday	08:00-09:00	5
	17:00 – 18:00	23
Saturday	13:00 – 14:00	15

- 4.9.3 The McDelivery drivers tend to be on site for a very short period of time as they need to pick up the order and depart straight away to the customer. The duration of stay on site is typically 5 minutes. This means that there would be likely 1 McDelivery vehicle parked at any one time during the Am Peak and 2 during the Pm and Saturday peaks.

5.0 TRAFFIC IMPACT ASSESSMENT

5.1 Total Traffic Flows

- 5.1.1 The 2021 Total traffic flows (2021 base plus non residential committed development traffic plus McDonald's traffic), 2036 Total traffic flows (2021 base plus all committed and parallel development plus McDonald's traffic) and 2036 Total Sensitivity flows (2036 Base Sensitivity plus McDonald's traffic) are included in Appendix CMC 2.0.

5.2 Retail Park Roundabout and Plas Coch Road Roundabouts

Modelling Approach

- 5.2.1 The Retail Park Roundabout and Plas Coch Road Roundabout were modelled using industry standard software Junctions 9 ARCADY. The details are provided in Chapter 6.0 of ADL TA Volume 2 December 2020. The models have been validated against the surveyed queues. The models have also been run on a 'one hour' profile which creates a 'peak within a peak'. The results presented are therefore the 'worst case' output for the 90 minute assessment period of the peak hour traffic situation. For ease of reference a summary of the results are replicated in Appendix CMC 17.0. The output results are included in Appendix CMC 18.0.

Output and Queues

- 5.2.2 The busiest periods at these roundabouts occurs during the Saturday peak period. These results are shown in Table 5A below.

Table 5A Peak ARCADY Results: Retail Park and Plas Coch Road Roundabouts (RFC and Queues)

Arm	Retail Park Roundabout Saturday Peak				Arm	Plas Coch Road Roundabout Saturday Peak							
	2021 Base+Com		2021 Total			2021 Base+Com		2021 Total		2036 Base+Com		2036 Total	
	RFC	RFC	RFC	RFC		RFC	Q	RFC	Q	RFC	Q	RFC	Q
East Arm (Access Road)	0.60	2	0.65	2	University Access	0.17	0	0.26	0	0.71	2	1.04	8
South Arm (site)	0.57	1	0.82	4	Plas Coch Rd South West	0.82	4	0.87	6	0.90	8	0.95	14
West Arm (Sainsbury's)	0.79	4	0.86	5	Retail Park	0.59	2	0.64	2	0.62	2	0.67	2
North Arm (Retail Park)	0.68	2	0.74	3	Plas Coch Rd North East	0.56	1	0.61	2	0.63	2	0.68	2

RFC = Ratio of Flow to Capacity

Q = Max Queue in Vehicles

5.2.3 The Retail Park Roundabout would operate with a max RFC of 0.86 during the year of opening with the Restaurant. The queues on all approaches to the roundabout would be only a few vehicles. The proposed increase in queues would also be only 1-3 vehicles on each approach. The Plas Coch Roundabout would operate with a max RFC of 0.87 during the year of opening situation with a queue of 6 vehicles on Plas Coch Road West. In the 2036 situation there would be a max RFC of 0.95 and a queue of 14 vehicles. This would be an increase of 6 vehicles compared to the base situation.

5.2.4 The plans in Appendix CMC 19.0 illustrate the modelled base and proposed queues on the network and illustrates that the queues can be accommodated without any adverse impact.

Delays

5.2.5 I have also examined the impact on delay per vehicle (in seconds) and these results are also summarised in Appendix CMC 17.0. During the AM and PM peaks the level of increased delay incurred at both roundabouts would be very low between 0 to 12 seconds. This level of delay would not amount to a perceptible difference.

5.2.6 I have extracted the Saturday peak results as shown in Table 5B below.

Table 5B Peak ARCADY Results: Retail Park & Plas Coch Road Roundabouts (Delay in Seconds)

	Retail Park Roundabout (Saturday Peak)				Plas Coch Roundabout (Saturday Peak)					
	2021 Base+Com	2021 Total	Difference		2021 Base+Com	2021 Total	Difference	2036 Base+Com	2036 Total	Difference
East Arm (Access Road)	4	5	+1	University Access	29	47	+18	74	250	+176 (2 min 56sec)
South Arm (site)	16	36	+10	Plas Coch Rd South West	13	18	+5	22	37	+15
West Arm (Sainsbury's)	20	31	+11	Retail Park	4	4	0	4	5	+1
North Arm (Retail Park)	12	16	+4	Plas Coch Rd North East	9	10	+1	10	13	+3

5.2.7 The situation at the Retail Park Roundabout during the Saturday peak would be that traffic on the access road into the Retail Park and exiting the Retail Park from the north would be delayed by less than 5 seconds. The traffic on the Site Access Road and leaving Sainsburys would be delayed 10-11 seconds. Again, this is unlikely to be a perceptible level of delay.

5.2.8 The situation at the Plas Coch Roundabout during the Saturday peak would be that additional delay on Plas Coch Road and the Retail Park arms would be only a few seconds. Delay would potentially start to occur on the University arm in the 2036 situation. This is consistent with the findings of the ITP TA for the University redevelopment (see para 3.1.4). ITP concluded that the University traffic would simply redistribute to the Crispin Lane Access without issue and the Planning Authority have accepted this.

5.3 A483 Junction 5 and Berse Road Roundabouts

Modelling Approach

5.3.1 Modelling of the Berse Road Roundabout was provided in Section 6.3 of ADL's TA Volume 2 (December 2020). This modelling was also validated against the surveyed queues at the roundabout. It is considered that this modelling is a worst-case assessment for the 2036 assessment because;

- The roundabout was modelled independently from the A483 Junction 5 Roundabout.
- The traffic for the 455 residential units was included in the model but not the proposed mitigation measures as it was not clear at the time of writing TA Volume 2 (December 2020) whether the Highway Authority supported these proposals. This has now been clarified by the Highway consultation comments February 2021).

5.3.2 I have undertaken a LINSIG model of the A483 Junction 5 Roundabout and Berse Road Roundabout as linked junctions. This is consistent with the LINSIG modelling provided by Focus Transport Planning for the Mold Road residential scheme. The model now includes the proposed highway improvements proposed for the Mold Road residential scheme in the 2036 scenarios. I have also modelled the pedestrian crossing on Plas Coch Road which is proposed to be provided as part of the McDonald's scheme in the 2021 and 2036 total scenarios. The junction geometries and output results are included in Appendix CMC 20.0. The results are summarised in Appendix CMC 17.0.

5.3.3 It should be noted that LINSIG is a stand alone model. The 2036 modelled situation has not made any reduction in traffic flows to represent the redistribution of traffic away from Junction 5 which could occur as a result of the Welsh Government proposals to improve Junction 4. I have also included the proposed highway improvements proposed for the Mold Road residential scheme in the 2036 scenarios. If the proposed Mold Road scheme should come forward then it is reasonable that the scheme would include measures to mitigate the traffic impact. Overall, the results are still similar to those provided within the December 2020 TA.

Output and Queues

5.3.4 The results for the Friday Pm peak which is the busiest period at the Berse Road Roundabout and A483 Junction 5 are summarized in Table 5C below.

Table 5C LINSIG Analysis: Berse Road/A483 J5 Roundabout, Friday Pm Peak 2021

Time period & Approach		Lane	2021 Base + Committed		2021 Total (Base+Com+McD)		Increase in Queues
			DoS	Queue	DoS	Queue	
Berse Road Roundabout	Plas Coch Road	Lane 1 + 2	92.7%	20	93.2%	25	+5
		Lane 3	58.2%	9	64.1%	12	+3
	Mold Road (SE)	Lane 1 + 2	85.7%	14	90.6%	16	+2
		Lane 3	57.0%	8	63.0%	9	+1
	Berse Road	Lane 1 + 2	63.6%	6	64.1%	6	0
		Lane 3 + 4	49.9%	4	51.3%	3	-1
	Mold Road (NW)	Lane 1 + 2	86.5%	17	88.4%	17	0
		Lane 3	75.7%	11	79.7%	12	+1
A483 J5 Roundabout	A483 (N)	Lane 1	86.5%	11	87.1%	12	+1
		Lane 2	87.6%	12	87.4%	12	0
	Mold Road (N)	Lane 1	54.0%	6	61.1%	7	+1
		Lane 2	56.8%	7	65.7%	8	+1
	Summerhill Road	Lane 1	62.3%	2	60.1%	2	0
	A483 (S)	Lane 1	72.4%	8	76.2%	9	+1
		Lane 2	88.2%	13	93.0%	15	+2
	Mold Road (E)	Lane 1	77.1%	15	78.4%	15	0
		Lane 2	73.3%	14	73.8%	15	+1
		Lane 3	45.0%	4	45.6%	4	0

5.3.5 Table 5C demonstrates that the maximum degree of saturation at the Berse Road Roundabout would be 93.2% with a mean max queue of 37 vehicles on Plas Coch Road (Lane 1/2 plus Lane 3). The proposed McDonald's would result in an increase in queues of +8 vehicles (+5 vehicles Lane 1/2 and +3 vehicles Lane 3). The max degree of saturation at the A483 Junction 5 Roundabout would be 93.0% on the A483 South with a mean max queue of 24 vehicles (Lane 1 and 2). The proposed McDonald's would result in an increase in queue of +3 vehicles (+1 vehicle Lane 1 and +2 vehicles Lane 2).

5.3.6 The 2036 results are summarised in Table 5D below.

Table 5D LINSIG Analysis: Berse Road/A483 J5 Roundabout Friday Pm Peak 2036

Time period & Approach		Lane	2036 Base + Committed		2036 Total (Base+Com+McD)		Increase in Queues
			DoS	Queue	DoS	Queue	
Berse Road Roundabout	Plas Coch Road	Lane 1 + 2	94.2%	21	96.0%	27	+6
		Lane 3	74.2%	12	73.4%	14	+2
	Mold Road (SE)	Lane 1 + 2	75.5%	10	77.8%	10	0
		Lane 3	56.0%	8	61.8%	9	+1
	Berse Road	Lane 1 + 2	60.5%	6	64.7%	6	0
		Lane 3 + 4	51.3%	4	53.6%	5	+1
	Mold Road (NW)	Lane 1 + 2	88.4%	18	90.5%	20	+2
		Lane 3	81.8%	14	85.5%	16	+2
A483 Junction 5	A483 (N)	Lane 1	83.6%	12	84.5%	12	0
		Lane 2	84.7%	12	85.3%	12	0
	Mold Road (N)	Lane 1	55.4%	7	74.4%	8	+1
		Lane 2	58.4%	8	81.7%	10	+2
	Summerhill Road	Lane 1	87.7%	5	87.0%	4	-1
	A483 (S)	Lane 1	82.2%	11	82.2%	11	0
		Lane 2	94.9%	17	94.9%	17	0
	Mold Road (E)	Lane 1	54.4%	7	50.1%	5	-2
		Lane 2	63.0%	8	64.7%	8	0
		Lane 3	33.7%	5	33.5%	5	0

5.3.7 Table 5D demonstrates that in 2036 there would be a slight increase in the degree of saturation on Plas Coch Road West of 96.0% and on the A483 South of 94.9% compared to the 2021 situation. The effect of the proposed McDonald's is still an increase in queues of a few vehicles on any lane on any approach. The effect of the proposed McDonald's is minimal with a slight increase in queues of a few vehicles on any lane on any approach.

5.3.8 The 2036 sensitivity test results are summarised in Table 5E below.

Table 5E LINSIG Analysis: Berse Road Roundabout 2036 Sensitivity

Time period & Approach		Lane	2036 Base Sensitivity		2036 Total Sensitivity (Base Sensitivity+McD)		Increase in Queues
			DoS	Queue	DoS	Queue	
Berse Road Roundabout	Plas Coch Road	Lane 1 + 2	97.5%	25	98.8%	30	+5
		Lane 3	81.0%	14	91.7%	20	+6
	Mold Road (SE)	Lane 1 + 2	82.2%	11	89.9%	16	+5
		Lane 3	63.8%	9	65.0%	10	+1
	Berse Road	Lane 1 + 2	83.3%	9	84.8%	9	0
		Lane 3 + 4	54.2%	4	62.5%	5	+1
	Mold Road (NW)	Lane 1 + 2	93.5%	22	91.2%	25	+3
		Lane 3	88.6%	16	86.5%	16	0
Friday PM Peak Hour	A483 (N)	Lane 1	74.8%	10	74.8%	10	0
		Lane 2	79.2%	12	85.6%	13	+1
	Mold Road (N)	Lane 1	61.7%	7	50.5%	7	0
		Lane 2	66.0%	9	54.9%	8	-1
	Summerhill Road	Lane 1	93.3%	7	81.3%	5	-2
	A483 (S)	Lane 1	84.4%	11	84.4%	11	0
		Lane 2	98.2%	20	98.4%	21	+1
	Mold Road (E)	Lane 1	62.7%	12	67.3%	12	0
		Lane 2	66.1%	11	83.7%	14	+3
		Lane 3	36.7%	5	43.2%	7	+2

5.3.9 The 2036 sensitivity results show a higher degree of saturation on Plas Coch Road West of 98.8% with an increase in queues of +11 vehicles (+5 vehicles Lane 1/2 and +6 vehicles Lane 3). The degree of saturation on the A483 South would be 98.4% with a slight increase in queues of +1 vehicle (Lane 2). Again, the effect of the proposed McDonald's is minimal with a slight increase in queues of a few vehicles on any lane on any approach.

Delays

5.3.10 The proposed increase in delay has been modelled at the Berse Road Roundabout and the A483 Junction 5 Roundabout and the results are shown in Tables 5F and 5G below. The proposal would result in an increased delay per vehicle of only a few seconds on any approach to the roundabout in 2021. By 2036 the potential proposed increase in delay would still be less than 20 seconds on any approach and it is still considered this would be unlikely to be perceptible to a driver in the course of a journey.

Table 5F Berse Road Roundabout: Delay in Seconds Friday Pm Peak

Arm	Lane	2021			2036			2036 Sensitivity		
		2021 Base + Com	2021 Total	Diff	2036 Base + Com	2036 Total	Diff	2036 Base+ Com	2036 Total	Diff
Plas Coch Rd	Lane 1+2	48	51	+3	55	65	+10	69	83	+14
	Lane 3	25	28	+3	32	32	0	35	54	+19
Mold Road (SE)	Lane 1+2	39	48	+9	28	30	+2	32	37	+5
	Lane 3	28	30	+2	26	28	+2	29	28	-1
Berse Road	Lane 1+2	20	19	-1	19	21	+2	35	39	+4
	Lane 3+4	16	16	0	16	17	+1	19	26	+7
Mold Road (NW)	Lane 1+2	27	29	+2	30	35	+5	40	32	-8
	Lane 3	21	23	+2	26	30	+4	31	28	-3

Table 5G A483 J5: Delay in Seconds Friday Pm Peak

Arm	Lane	2021			2036			2036 Sensitivity		
		2021 Base + Com	2021 Total	Diff	2036 Base	2036 Total	Diff	2036 Base Sensitivity	2036 Total Sensitivity	Diff
A483 (N)	Lane 1	55	56	+1	46	47	+1	36	37	+1
	Lane 2	57	56	-1	47	48	+1	38	46	+8
Mold Road (N)	Lane 1	30	35	+5	29	44	+15	32	25	-7
	Lane 2	30	36	+6	29	48	+19	33	26	-7
Summerhill Road	Lane 1	43	35	-8	102	98	-4	118	67	-51
A483 (S)	Lane 1	41	44	+3	48	48	0	51	51	0
	Lane 2	55	67	+12	76	76	0	95	96	+1
Mold Road (E)	Lane 1	14	14	0	11	9	-2	14	21	+7
	Lane 2	16	17	+1	8	7	-1	17	24	+7
	Lane 3	6	6	0	9	9	0	9	12	+3

5.4 Traffic Impact Assessment

5.4.1 I have calculated the level of additional McDonald's traffic and the percentage increase that this represents at the Plas Coch Road, Berse Road and A483 Junction 5 Roundabouts as the Welsh Government have a 5% threshold for analysis. This is presented in Table 5H below.

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%

- 5.4.2 The peak hour traffic impact of the proposed McDonald's would be a 4.9%-6.2% increase at the Plas Coch Roundabout, 1.7%-3.5% at the Berse Road Roundabout and 0.07%-0.9% at the A483 Junction 5 Roundabout.
- 5.4.3 The proposed impact at the A483 Junction 5 Roundabout is miniscule compared to the volume of traffic and well below the 5% threshold which the Welsh Government would normally require any junction assessment.
- 5.4.4 As I will explain in Section 7.1 the level of back ground growth which has been assumed by other assessments of the network has been well above the levels which are actually likely to occur and allow for small scale developments (such as the McDonald's) to come forward.

6.0 PARKING IMPACT ASSESSMENT

6.1 Parking Impact Assessment

6.1.1 The level of available parking which would be available in the proposed car park has been assessed based on the results of the three parking surveys undertaken at the Argos/The Range/Iceland car park (see Section 2.5) and the maximum McDonald's parking demand (see Section 4.7). The results are summarised in Tables 6A-6C below.

Table 6A Parking Demand Assessment Retail Park Car Park Based on May 2019 Survey

Proposed Parking Provision for Retail Park and McDonald's		Retail Park Peak Demand	McDonald's Peak Demand	Total Demand		Spaces Available
				No	% occupancy	
194	Friday	78	22	90	46%	104
	Saturday	138	28	166	85%	28

Table 6B Parking Demand Assessment Retail Park Car Park Based on July 2021 Survey

Proposed Parking Provision for Retail Park and McDonald's		Retail Park Peak Demand	McDonald's Peak Demand	Total Demand		Spaces Available
				No	% occupancy	
194	Friday	61	22	83	43%	111
	Saturday	95	28	123	63%	71

Table 6C Parking Demand Assessment Retail Park Car Park Based on September 2021 Survey

Proposed Parking Provision for Retail Park and McDonald's		Retail Park Peak Demand	McDonald's Peak Demand	Total Demand		Spaces Available
				No	% occupancy	
194	Friday	63	22	85	44%	109
	Saturday	124	28	152	78%	42

6.1.2 The level of available parking during the busiest periods on a Saturday lunchtime and has been assessed as:

- May 2019 28 spaces
- July 2021 71 spaces
- September 2021 42 spaces

- 6.1.3 There would be 28-42 spaces available within the car park during the busiest periods. To put this into context the 28 available spaces is equivalent to 15% of the proposed 194 space provision. Therefore, even if small scale fluctuations in demand were to occur then they could be accommodated within the shared car parking without any over spill car parking.

6.2 Match Day Impacts

- 6.2.1 The McDonald's Committee Report (page 57) raised the issue of the management of the restaurant on Match days:

“Concerns over the use of the site as a drive-thru facility on football match day could be addressed through a condition that would prevent vehicle access, but allow trading to continue for pedestrians, as at other McDonald sites in close proximity to football stadia. There is an example of this at the McDonald's close to Cardiff City Stadium where the vehicle access is blocked off and the drive through lane operates successfully as a “walk through” on match days. Anecdotal evidence has suggested that issues may arise occasionally on home Match days, so this suggestion is made as a point for consideration. I am not aware that there is a specific planning condition as it is something that is observed to happen in practice when the Cardiff City Football Stadium carpark has problems before/after any home matches. However, match day restrictions would not be necessary to make the development acceptable in highway safety terms, and though a condition would be welcomed, it is not necessary in highway safety terms to allow planning permission to be granted.”

- 6.2.2 The site is located 450m south of Wrexham Football Club (shown on the plan in Appendix CMC 1.1). The restaurant car park would be subject to a 1.5-hour parking restriction on match days (same as the existing car park) which would prevent long stay parking football visitors. As the Highway Authority have recognised McDonald's actively and successfully manage sites as necessary when located close to football stadiums. If the Inspector considered it necessary then an appropriate condition for a Match Day Management Plan could be included.

7.0 SENSITIVITY ASSESSMENTS

7.1 Traffic Growth

7.1.1 I have explained in Section 2.2 that a sensitivity assessment has been provided using TEMPRO/NTM growth rates of 17-18% from 2019-2036. I will further explain the extent that this is a likely a well overestimation of the base future traffic situation. The reasons for this are as follows:

1) Traffic flows on the network have been stable since 2013

7.1.2 I have extracted the weekday traffic flows from the various studies in Section 3.1. Table 7A below shows that traffic levels recorded in 2019 and 2020 are still very similar to those recorded in 2013. I therefore concluded that if background growth on this network has not occurred historically and therefore there is no reason why it would not continue to be very low in the future (see 'Total' columns in Table 7A).

7.1.3 The traffic growth that would occur on the local network is far more likely to occur as a result of the committed/parallel developments identified in Section 2.2.

Table 7A Comparison of Traffic Levels

	2013 Motts Study 2017 (PCUs)			2018 ITP TA Dec 2018 (PCUs)			2019 Focus TA Dec 2019 (PCUs)			2020 ADL TA Vol 2 Dec 2020 (PCUs)		
	Berse Rd Rbt	A483 J5	Total	Berse Rd Rbt	A483 J5	Total	Berse Rd Rbt	A483 J5	Total	Berse Rd Rbt	A483 J5	Total
Am Peak	3651	3929	7580	4123	3931	8059	3576	4040	7616	3934	3776	7710
Difference to 2013 traffic levels						+6%			+0.4%			+1%
Pm Peak	4354	4317	8671	4197	4290	8487	4226	4433	8659	4421	4150	8571
Difference to 2013 traffic levels						-3%			-1%			-2%

- 2) **The traffic generated by the committed/parallel developments which would be in situ in 2036 is far less than TEMPRO/NTM Growth predicts**

7.1.4 The traffic impact of the committed/parallel developments has been calculated in Table 7B below.

Table 7B Proposed Traffic Impact of Committed Development

		2020 Surveyed Traffic (PCUs)	All Committed and Parallel Development	2020 Surveyed +Committed Traffic	% Increase
Berse Rbt	Am Peak	3934	+267	4201	+6.7%
	Pm Peak	4421	+288	4709	+6.5%
	Saturday Peak	3840	+242	4082	+6.3%
A483 J5	Am Peak	3776	+307	4083	+8.1%
	Pm Peak	4150	+347	4497	+8.4%
	Saturday Peak	3641	+243	3884	+6.6%

7.1.5 Table 7B demonstrate that the committed developments are likely to result in a potential 6-8% growth in traffic levels by 2036. This is significantly lower than the 2020-2036 17-18% predicted based on TEMPRO/NTM growth factors used in my sensitivity assessment. (See Section 2.2).

7.1.6 It is also considered that the growth factor assumptions applied by other consultants assessing the network, (ITP TA – 20% to 2035 for the University scheme and Focus TA- 12% to 2030 plus committed University scheme for 455 residential units) are also a worst case because they are higher than the 6-8% growth which is likely to occur due to the identified committed/parallel development.

- 3) **This is still the case if the McDonald's traffic generation is included**

7.1.7 It is concluded that the event of small-scale developments coming forward (such as the McDonald's restaurant) has already been factored into the 2036 sensitivity situation (i.e. 17-18% growth or 10% above the committed development scenario) The addition of the McDonald's traffic on top of this is again a worst-case scenario. The level of increase in traffic would still be less than 10% over 16 years.

Table 7C Proposed Traffic Impact of Committed Development

		2020 Surveyed Traffic (PCUs)	All Committed and Parallel Development	McDonald's Traffic	2020 Surveyed +Committed + McDonald's Traffic	% Increase
Berse Rbt	Am Peak	3934	+267	+71	4272	+8.6%
	Pm Peak	4421	+288	+109	4818	+8.9%
	Saturday Peak	3840	+242	+137	4219	+9.8%
A483 J5	Am Peak	3776	+307	+3	4086	+8.2%
	Pm Peak	4150	+347	+16	4513	+8.7%
	Saturday Peak	3641	+243	+34	3918	+7.6%

7.1.8 In conclusion even with the McDonald's in situ there is still an 8% difference in the 2036 scenario with the committed development (the likely to occur situation) and the 2036 sensitivity test based on the TEMPRO growth factors. The worst case modelling I have provided in Section 5.3 has demonstrated that the McDonald's traffic can still be accommodated and has minimal impact on the operation of the road network.

7.2 Proposed Traffic Generation

7.2.1 To ensure my analysis of the level of proposed traffic generation is robust, I have undertaken a sensitivity test based on TRICS (version 7.8.2) as an industry standard assessment. I have run the TRICS assessment for all urban McDonald's restaurants surveyed in last 8 years in England (excluding Greater London), Scotland and Wales for a weekday and Saturday. This generates trip rates based on restaurant floor area.

7.2.2 The results are included in Appendix CMC 21.0 and are summarised in Table 7D for the peak hours.

Table 7D Traffic Generation Assessment Based on TRICS Trip Rates

		McDonald's TRICS Sites		ADL Assessment Based on McDonald's Surveys		Difference	
		In	Out	In	Out	In	Out
AM Peak	Trip Rates	17.587	17.972				
	Traffic Generation 472sqm	83	84	70	70	+13	+14
PM Peak	Trip Rates	23.232	23.196	-	-		
	Traffic Generation 472sqm	109	109	111	113	-2	-4
Saturday Peak	Trip Rates	31.717	30.074	-	-		
	Traffic Generation 472sqm	150	142	119	128	+31	+14

7.2.3 The results demonstrate that compared to the proposed traffic generation in Section 4.6. The proposal could generate;

- Am peak +13 vehicles
- Pm Peak -2 vehicles
- Saturday Peak +31 vehicles

7.2.4 The TRICS traffic generation calculations are +13 vehicles higher than those predicted based on the McDonald's surveys during the Am peak. The TRICS traffic generation calculations during the Pm peak are very similar. The TRICS traffic generation during the Saturday peak could be +31 vehicles compared to the assessment based on the McDonald's surveys.

7.2.5 I have assessed the potential implications this sensitivity traffic could have as follows:

1) Traffic Impact

7.2.6 As set out in Section 4.6 not all of these trips would be new to the network. It is expected that 25% of the trips on a weekday and 18% on a Saturday would be shared with the Retail Park. This reduces the potential difference in traffic impact further to 10 vehicles during the Am peak and 25 vehicles during the Saturday peak. Even if this slight variation in traffic were to occur it is unlikely to make a material difference to my assessed operation of the road network given the volumes of existing traffic and robust assumptions on background traffic growth. As a worst case the modelled queues may increase by 1 or 2 vehicles during the peak of the Saturday peak periods compared to that assessed but this does not alter the conclusion that the overall impact is still negligible.

2) Parking Demand and Drive Thru Use

7.2.7 Based on the proposed visitor types at the restaurant the additional sensitivity traffic during the Saturday peak could be split as shown in Table 7E below.

Table 7E Sensitivity Test Parking Demand and DT Use

	Total Traffic	Drive Thru	Counter	McDelivery
ADL Assessment	119	69	35	15
TRICS Sensitivity Assessment	150	87	44	19
Difference		+18	+9	+4
Parking Demand/DT Increase		+1	+5	0

- 7.2.8 If there are potentially 18 more vehicles using the drive thru lane, this is equivalent to one additional vehicle every 3 minutes. The surveys of the drive thru queues at the comparable restaurants were undertaken in 2 minute intervals. It is possible that this potential additional traffic could increase the queues by 1 vehicle compared to that surveyed. The average max queue based on the 3 original surveyed restaurants was 10 vehicles on a Saturday so a slight increase could easily be accommodated and would only likely occur for a short period of time (see Section 6.3 ADL TA December 2019). The queues would be contained well within the site, within the Retail Park and would have no impact on the public highway.
- 7.2.9 If there are potentially 9 more customers parked and they stay on site for typically 30 minutes this is an additional 5 cars. The surveys of the Retail Park have demonstrated that there is more than sufficient car parking to absorb this slight increase without any risk of overspill parking.
- 7.2.10 If there are potentially 4 more McDeliveries then these would be parked for such a short duration (5 minutes) that there is unlikely to be any overall difference to the parking requirement for 2 spaces.
- 7.2.11 TRICS generates trip rates based dividing the traffic flows based on the floor area of the building, in this case McDonald's restaurants. However, ADL's research as provided in Appendix 10.0 of ADL TA December 2019 is that there is actually no relationship between floor area and level of traffic generation for drive thru restaurants. Consequently, the above analysis is in my view a worst case, robust assessment and I justify this in the following two paragraphs.

7.2.12 Based on our research a more representative comparison is to use the actual surveyed traffic at the McDonald's restaurants from TRICS and calculate an average. This is the same methodology as used with the three comparable restaurants in Section 4.6. A copy of this analysis is included in Appendix CMC 21.3 and the results are summarised in Table 7F below.

Table 7F Traffic Generation Assessment Based on TRICS Surveyed Traffic Levels

		McDonald's TRICS Sites Survey Results		ADL Assessment Based on McDonald's Surveys		Difference	
		In	Out	In	Out	In	Out
Am Peak	Traffic Generation	69	70	70	70	-1	0
Pm Peak	Traffic Generation	94	93	111	113	-17	-20
Saturday Peak	Traffic Generation	112	121	119	128	-7	-7

7.2.13 The results of this assessment are the traffic flows predicted for the site are either the same or actually slightly lower than those I have used. Therefore, the assessment I have provided based on the TRICs trip rates is a worst-case assessment.

7.2.14 I have now provided further evidence through independent (TRICS) surveys of McDonald's restaurants and the results (either by trip rate per 100sqm or by direct comparison) are broadly in line and consistent with my original assessment.

7.2.15 I can therefore justifiably conclude that the proposed traffic generation figures provided in Section 4.6 are reasonable and robust and even if as a worst case the TRICS levels (based on trip rates) occurred, these would still have no adverse impacts on the operation and performance of the restaurant proposal.

8.0 WREXHAM COUNCIL OPINIONS AND INCONSISTENCIES

8.1 Traffic Impacts

- 8.1.1 Extracts of the Committee reports for the University Redevelopment applications P/2018/0671 (pages 91-94) and P/2018/0672 (page 107) are provided in Appendix CMC 22.0. The Planning Authority concluded that although the junctions would be at or close to capacity this would not be sufficient grounds to withhold planning consent.

“The applicant’s submissions suggest that the proposed development will not have a significant impact upon the A541 Mold Road / Plas Coch roundabout. Highways have questioned this conclusion...”

...I do not dispute the fact that the A541 Mold Road / Plas Coch roundabout becomes congested at peak hours. It is a key part of the highway network on the main route into the town centre from the A483 trunk road. That said, whilst there is no disputing the fact that the additional development will result in additional vehicle movements on to the highway network, there is no information before me to suggest that the nature of the proposed development will adversely impact upon the operational safety of the roundabout. Simply observing congestion, and concluding that a development will add to that congestion is not, in planning terms, sufficient reason to withhold a planning permission.

(ADL underlining. Source Application P/2018/0671 pg 91)

And that:

“Whilst it is accepted that the increase in density of the site will inevitably result in some increase in traffic movements, I am not convinced that this will result in a detriment to highway safety, but more of an issue for minor inconvenience which will only occur in Wrexham regardless of this proposal as a result of natural population and development growth.

(ADL underlining. Source Application P/2018/0671 page 94)

- 8.1.2 The Welsh Government and Highway Authority have raised no objection to the application for the 455 houses off Mold Road. If this development were to come forward it would be appropriately mitigated. It is expected these works would be developed alongside the Welsh Governments proposals.

- 8.1.3 The Planning and Highway Authority have determined that that the current traffic situation and longer-term requirement for improvement of the A483 Junction 5 and Berse Road Roundabout did not either; justify the refusal of the University or warrant an objection to the Mold Road application which are both major developments.
- 8.1.4 In my view the Members have acted inconsistently. They have accepted the Committee Report and granted permission for the 410 dwellings plus 197 student flats on the University site on the basis that;

Simply observing congestion, and concluding that a development will add to that congestion is not, in planning terms, sufficient reason to withhold a planning permission.

However then refused the McDonalds application on the basis that;

“The existing highway network leading to and serving the Plas Coch Retail Park suffers from capacity issues during the weekday peak times and at the weekend when significant queuing/delays are experienced. The proposed development would exacerbate the existing problems and result in further traffic congestion to the detriment of the free flow of traffic on the highway.

The same queuing traffic is in one application ***not, in planning terms, sufficient reason to withhold a planning permission*** and therefore consistent with policy GDP1(d), but regarding the McDonald’s application the same traffic situation is ***detriment of the free flow of traffic on the highway*** and contrary to policy.

- 8.1.5 In my opinion (especially as I have presented evidence regarding the stability of the network traffic flows over the last 7 years) there is no justifiable, technical or planning basis for reason for refusal 1.

8.2 Parking Standards

- 8.2.1 The Planning Authority opinion on the application of Local Planning Policy Guidance Note 16 is provided in the Committee report for the 410 units University redevelopment (see Appendix CMC 22.0).

...Highways have also raised concern that the development has under provided for car parking provision to an unacceptable level.

Members are reminded that the standards quoted in in LPG16 are maximum standards. They are not intended to be used as a starting point or a minimum level of parking provision.

...It is also located within reasonable walking distance of the town centre and a range of retailing options as well as access to key employment opportunities within Wrexham...

...Where developments are close to local services and facilities and/or are in areas where people are able to walk or cycle to them or travel to them easily by public transport, it may be appropriate for less on site parking to be provided than for developments in remoter areas. In areas where people can easily travel to sites by means other than by car, reducing the amount of space dedicated to car parking could allow land to be used more efficiently by enabling a higher density development...

...In view of the Welsh Government's desires to promote a higher standard of development and to reduce reliance upon car usage, I can see no reason why this development should represent a need to provide a high level of car parking provision. This would apply with its own transport hierarchy which seeks to promote walking and cycling over the use of the car."

(ADL underling. Source Application P/2018/0671 pages 91 and 92)

And that:

"...the Welsh Government require local planning authorities to give serious consideration to reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport."

(Source Application P/2018/0671 page 92)

- 8.2.2 The Planning Authority judgement with regards to car parking for the 410 units, was that in accessible locations parking below the maximum standards is not only acceptable but should be encouraged to promote sustainable travel. The provision below the parking standards was judged to accord with Policy T8 and the Councils parking standards.
- 8.2.3 The proposed development site is located opposite the University, therefore the level of accessibility is very similar.
- 8.2.4 The Members have again acted contrary to their previous basis for decision making using LPG16 as the justification to base a reason for refusal on parking. Reason for refusal 2 states;

“and would fail to provide sufficient off-street parking to meet the existing retail demand, *contrary to Policy T8 of the adopted Wrexham Unitary Development Plan and the adopted Local Planning Guidance Note No. 16 - Parking Standards.*”

Again, this demonstrates that there is no technical or planning based justification for reason for refusal 2.

8.3 Approach to Planning Applications

8.3.1 As outlined in Section 9.5 of ADL’s TA Volume 2 the level of work which has been undertaken to support the McDonald’s planning application far exceeds that which would normally be expected for a development generating similar amounts of traffic.

8.3.2 The level of transportation modelling and assessment has been comparable with that submitted for the major planning applications on the University site and Mold Road. As residential developments all of the traffic generated would be new to the network whereas only a proportion of the McDonald’s traffic is additional. The two-way flows are compared in Table 8A below.

Table 8A Traffic Generation Additional Trips to Network (Two Way)

	University Development (410 units)	Mold Road 455 Units	McDonald’s
Am Peak	204	273	64
Pm Peak	221	337	103

9.0 ASSESSMENT OF REASONS FOR REFUSAL 1

9.1 ***Allegation that: The existing highway network leading to and serving the Plas Coch Retail Park suffers from capacity issues during the weekday peak times and at the weekend when significant queuing/delays are experienced***

9.1.1 I have assessed the local road network leading to and serving the Plas Coch Retail Park during the weekday morning and evening peak periods and Saturday lunchtime. The design of the local roundabout is intended to hold and release traffic at the junctions so queues/delays are an integral and intended feature of the network in this location. The traffic surveys have shown that the roundabouts are busy but the level of surveyed queues at the Retail Park, Plas Coch Roundabouts are low and the queues at the Berse Road and A483 Junction 5 build on the arms as the signals turn red and then predominantly clear once the lights turn to green.

9.1.2 The Highway Authority, Welsh Government and Focus Transport Planning (assessing the 455 units on Mold Road) have all determined that the A483 Junction 5 and Berse Road Roundabout are close to capacity will require improvements in the future to accommodate the Local Development Plan allocation and the major Mold Road residential scheme (if it should be permitted). These improvements are proposed to be provided and funding has been allocated in the National Finance Plan and would be also be provided by the Developer of the Mold Road residential scheme.

9.1.3 The Welsh Government SATURN modelling has also concluded that the A483 Junction 5 and the Berse Road Roundabout do not operate in isolation but that the capacity of these junctions is influenced by traffic conditions along the whole of the A483 corridor.

9.1.4 Whilst there is some queueing and delay which occurs on the local road network, the position of the Council has been that this has not been sufficient reason to prevent, refuse or object to other major development coming forward. This has been demonstrated through the approval of the University schemes and the lack of objection raised to the residential application off Mold Road.

9.1.5 The requirement to improve the A485 Junction 5 and Berse Road Roundabout is therefore entirely independent and outside of the scope of the McDonald's application. The Welsh Government proposals are currently subject to independent review and the Mold Road scheme has not been permitted. There is therefore some uncertainty on the exact layout of the road network in the 2036 scenario. However, if improvements come forward as funded/proposed they are most likely to be in the form I have assessed. If the Mold Road scheme is not permitted then there will not be the associated level of traffic generation. If the Welsh Government scheme does not come forward then this will be their independent decision based on their assessment of what is best for the A483 corridor and in full knowledge of the potential traffic effects. I have demonstrated with the 2036 sensitivity test scenario that the development traffic can be accommodated without adversely impacting on the operation and performance of the A483 corridor.

9.2 Allegation that: *The proposed development would exacerbate the existing problems and result in further traffic congestion to the detriment of the free flow of traffic on the highway*

9.2.1 The first question to consider is whether there is an existing problem on the highway network.

9.2.2 Free flow conditions on this part of the road network simply do not exist and have never been intended to with the design of the roundabout junction arrangements. As I explained in Section 1.2 the reason for refusal is contradictory in this respect and demonstrates the lack of technical understanding of the Planning Authority in formulating the reason for refusal.

9.2.2 Additionally I have shown in Section 8.1 the inconsistency in which the existing traffic conditional have been applied to different applications. As the Council have accepted the additional traffic which would be generated by the University and Mold Road residential schemes and not deemed that this would exacerbate any existing problems. If the issues with the road network were insurmountable or there was no scope to accommodate *any* further traffic then this would not be the case.

- 9.2.3 I have demonstrated in Chapter 3.0 that the Highway Authority and the Welsh Government (including Mott MacDonald working on behalf of both) have spent considerable time and resources surveying, modelling and assessing the road network in the vicinity of the application site. They therefore have extensive and detailed knowledge and understanding of its operation. The Highway Authority and Welsh Government accepted the conclusions of ADL's Transport Assessments and raised no objection to the application.
- 9.2.4 The sensitive periods on the road network occur at the A483 Junction 5 and Berse Road Roundabout during the weekday Pm peak and the Retail Park and Plas Coch Road Roundabouts during the Saturday peak. The Am peak is less of an issue as the road network and Retail Park have lower traffic flows.
- 9.2.5 I therefore do not consider that there is any significant existing problem with the performance of the local road network which precludes the accommodation of further traffic generation. The reason for refusal is predicated wrongly on this basis.
- 9.2.6 The key question in planning terms is whether the highway impacts of the development would be unacceptable. In this context Policy GDP1(d) of the Local Plan which is referred to in the reason for refusal refers to safe and convenient pedestrian and vehicular access, to and from development site both on site and in the nearby locality. I have therefore examined how, exactly the proposal could affect the traffic situations from the evidence I have provided in the previous chapters and whether this would lead to an unacceptable impact.

Effect of increased traffic generation

- 9.2.7 The level of proposed traffic has been modelled using the industry standard software ARCADY and LINSIG and has been validated against the surveyed queue situation. The impact of the proposal has been demonstrated to be a slight increase in queues which would have negligible impact on the performance and operation of the network compared to the base situation.
- 9.2.8 I have demonstrated that the queues which would occur with the proposed development could be accommodated on the network without any adverse impact.

9.2.9 The proposed delay on the network would be only a few seconds per vehicle at the Retail Park and Plas Coch Roundabouts. The exception would be the University Access during the 2036 situation but as I have explained in paragraph 5.2.8 this has been assessed by the Council and accepted as not presenting an issue in practice due to internal traffic redistribution within the University site. The proposed increase in delays at the Berse Road Roundabout and A483 Junction 5 Roundabout would also only be a few seconds on any approach in any scenario.

9.2.10 The level of proposed traffic has been assessed both based on comparable restaurants and TRICS. As a worst case even if the level of traffic was slightly higher during the Saturday peak this would not change the conclusions of the traffic modelling or result in any operational impact which could not be accommodated without any adverse impact.

9.2.11 The Highway Authority have acknowledged in their consultation comments dated 22nd March 2021 that there will be a degree of self-regulation of the proposed traffic during busy periods on the network:

“at peak times it is likely that congestion will deter visitors to the restaurant.”

I concur with this view especially during the weekday Am and Pm peaks when customers are more likely to be under time constrained journeys travelling to and from work. If they do not deem the proposed restaurant convenient to access then they simply will not make the additional or pass by/diverted trip.

9.2.12 I have demonstrated that the sensitivity assessment during the 2036 situation is likely a worst-case assessment which significantly overestimates the likely level of traffic growth which would occur on this part of the road network. Therefore, the traffic is not an existing problem on this part of the road network and therefore would not be exacerbated.

Effect due to increased pedestrians

9.2.13 I have demonstrated that the level of pedestrian trip generation would be low with 6 pedestrian groups during the Am Peak, 10 during the Pm peak and 14 during the Saturday peak.

9.2.14 The proposed pedestrian crossing on Plas Coch Road would cause momentary delay of traffic as pedestrians call the signal to cross the road. The traffic would be released to continue. The slight inconvenience this may incur for motorists is outweighed by the improved; highway safety, convenience and accessibility which would be experienced by pedestrians. The pedestrian crossing operation has been built into the LINSIG model and the queues can be accommodated.

9.2.15 Wrexham Council have raised no objection to the Welsh Government scheme which also includes a signalised pedestrian crossing on Plas Coch Road but located at the exit of the Berse Road Roundabout. The principle of a new pedestrian crossing on Plas Coch Road has therefore been accepted. In my view I would expect that if the McDonald's scheme is permitted then both crossings are unlikely to be necessary, however this would be a decision for the Highway Authority/Welsh Government in due course. The location of the ADL proposed crossing is 80m further east from the roundabout and would reduce the likelihood of queues from the crossing impacting on the operation of the roundabout and in my opinion would be preferable in terms of minimising any impact on the operation of the road network.

9.2.16 Therefore the proposed level of pedestrians and the introduction of the proposed pedestrian crossing would not result in any traffic problem.

Effect due to drive thru queues

9.2.17 The drive thru lane is located well within the site, within the Retail Park some 111m from the public highway. The level of queues expected can be accommodated within the drive thru lane and would have no impact. Even if the level of proposed traffic were slightly higher as per the sensitivity test, I have provided this would only likely result in a slight increase in queues which could still be accommodated within the drive thru lane and still have no impact. There would be no traffic problem as a result of the drive thru.

Effect on Match Days

9.2.18 Match days where First Team Wrexham play at home occur typically 22 days per year with matches on either a Saturday at 15:00hrs or Tuesday at 19:45hrs. The matches therefore do not coincide with the network traffic peak periods or the peak periods of

demand for the restaurant. I have explained how the proposed development could be managed to ensure no adverse impacts occur.

- 9.2.19 Therefore the activity at the football stadium is not an existing problem, mitigation is proposed so there would be no traffic problem.

Proposed Mitigation Measures

- 9.2.20 The proposed scheme includes measures to mitigate the slight impacts on the network. The proposed improvements are however designed to improve pedestrian accessibility and safety rather than traffic capacity. This approach is entirely appropriate and consistent with the Welsh Governments recommendations for improvement of the road network surrounding the A483 Junction 5. The proposals would improve highway safety which would benefit McDonald's customers, pedestrians from the new University development and those already on the footway network surrounding the site.

- 9.2.21 The proposed mitigation measures address the existing highway safety problems which have been identified by the Road Safety Audit.

Effect on Highway Safety

- 9.2.22 There are no highway safety issues which would be exacerbated by the proposal. As explained in paragraph 10.2.12 the proposal would actually improve highway safety in the vicinity of the site.

9.3 Allegation that: *To allow the development would be contrary to Policy GDP1 (d) of the adopted Wrexham Unitary Development Plan*

- 9.3.1 Policy GDP1 part d) states that all new development should:

“Ensure safe and convenient pedestrian and vehicular access to and from development sites, both on site and in the nearby locality.”

Safe Access

- 9.3.2 The site access is located well within the existing Retail Park and benefits from the existing access arrangements for the car park and does not require the creation of a new access onto the highway network. Pedestrian access is facilitated within the site with zebra crossing facilities and painted walkways alongside the car parking. There would be two zebra crossing points on the Access Road which would provide safe access routes for pedestrians from the Retail Park to the restaurant.
- 9.3.3 Accident analysis has been provided of the surrounding road network. There are no highway safety issues pertaining to vehicular access which have been identified or would be exacerbated by this development.
- 9.3.4 Pedestrian safety in the locality of the development has been independently reviewed and all recommendations which have been raised by the Auditors have been addressed. The proposals would improve highway safety for pedestrians in the vicinity of the site.
- 9.3.5 It is concluded that access to the development would be safe for both vehicles and pedestrians.

Convenient Access

- 9.3.6 The definition of convenient is “suitable or opportune” according to the Collins English Dictionary or “suitable for your purposes and needs and causing the least difficulty” according to the Cambridge Dictionary.
- 9.3.7 The location of the site within the Retail Park facilitates easy shared trips with the Retail units by both drivers and pedestrians which reduces the need to travel. The access is and therefore suitable and opportune for the creation of convenient linked trips. This also reduces the traffic impact that the proposal has on the wider road network.

- 9.3.8 The term convenience is relative. There is an existing acceptable level of delay or inconvenience on the local road network which occurs in any event due to the volume of traffic and design of the junctions. It will not be drivers expectation or experience that there will be 'free flow' traffic on this road layout at any time including during peak periods.
- 9.3.9 There will also be a level of additional queueing, delay and inconvenience which will occur due to the traffic generated by the committed development. The Council's opinion has been that this potential additional inconvenience has not justified refusing or objecting to either the University or Mold Road residential schemes.
- 9.3.10 It have demonstrated through the junction modelling that the level of additional delay which would occur as a result of the McDonald's application would be minimal and generally in the order of a few seconds per vehicle on the approach at each junction. This level of increased delay would be imperceptible to drivers on the network and unlikely to result in any experience of increased difficulty in accessing the site especially in peak hour conditions when drivers will reasonably expect the road network to be busy anyway.
- 9.3.11 In my opinion the access to the restaurant is convenient in terms of location and design. There is also negligible/unperceivable difference between the level of convenience of drivers accessing the Retail Park in the baseline situations and the convenience of accessing the proposed restaurant.
- 9.3.12 Pedestrian access to the restaurant and the Retail Park would be improved and therefore would be more convenient than the existing situation.
- 9.3.13 By the 2036 situation the Welsh Government proposals may also be implemented which would again improve safety and convenience of access for vehicles and pedestrians.
- 9.3.14 The proposal therefore accords with Policy GPD1(d).

9.4 Summary

- 9.4.1 The above analysed and assessed conclusions have all been reached which clearly demonstrate that the first reason for refusal has no justifiable, technical or planning basis to support the refusal of this application.

10.0 ASSESSMENT OF REASONS FOR REFUSAL 2

10.1 ***Allegation that: The proposed development would result in the loss of 70 parking spaces which serve the existing retail uses***

10.1.1 It is correct that the proposal would result in the loss of 70 spaces for the existing retail units as set out in Table 4A.

10.2 ***Allegation that: This reduction in parking would result in a significant shortfall of spaces available and would fail to provide sufficient off-street parking to meet the existing retail demand***

10.2.1 I have demonstrated that the part of the car park is lightly used with typically only a few vehicles parked even during the busiest Saturday peak periods. This is the rationale why the site has been offered for redevelopment as it currently represents an inefficient use of the site.

10.2.2 I have demonstrated in Section 6.1 through three separate parking surveys that there would be sufficient parking proposed to accommodate the expected level of demand. There would be between 28-42 spaces available within the car park during the busiest Saturday lunchtime period. This allows for some fluctuations in peak demand.

10.2.3 There is no technically justifiable reason why the proposed level of parking is not sufficient.

10.3 ***Allegation that: Contrary to Policy T8 of the adopted Wrexham Unitary Development Plan***

10.3.1 Policy T8 relates to the Council's parking standards as follows.

“Policy T8 Development granted planning permission will be required to provide vehicle parking spaces either on site or nearby, in accordance with the Council's current parking standards. Special regard will be paid to the following factors, as appropriate:

- a) ***The availability of public transport nearby***
- b) ***Proximity of public car parking***
- c) ***Proximity to local services and facilities***
- d) ***Road safety hazards and amenity considerations arising from on street parking in the vicinity of the site***

Where implementation difficulties arise in making parking provision on site or nearby the Council will require a developer to make financial contributions for measures to assist public transport, or walking and cycling as appropriate.”

10.3.2 It is proposed to provide 195 parking spaces to serve the restaurant and the existing retail units. The current parking standards are Wrexham Council Local Parking Guidance Note No. 16 and as these are maximum standards, I have demonstrated that the proposed provision accords with the standards. The site is:

- a) accessible by public transport as outlined in Section 3.2 ADL TA December 2019.
- b) located within a wider Retail Park where customers could walk within and between uses.
- c) the location of the restaurant facilitates shared trips and shared car parking.
- d) The survey assessments have demonstrated that there would be sufficient car parking provided on site and therefore no overspill car parking would occur. Therefore, there would be no impact on highway safety or residential amenity.

The level of parking provision is sufficient for the development however measures are proposed to improve the accessibility of the site by walking and this would be in accordance with Policy T8.

10.3.3 The proposal accords with Policy T8

10.4 Allegation that: *Contrary to... the adopted Local Planning Guidance Note No. 16 - Parking Standards*

10.4.1 Wrexham Council Local Parking Guidance Note No. 16 was adopted in July 2018.

10.4.2 An assessment of the parking standards is provided in Table 10A below.

Table 10A Assessment of Parking Standards

Land Use	Maximum Parking Standard	Development	Maximum Parking Requirement	Proposed Provision
A1 retail	1 space/20sqm gfa	6,033sqm	301	165
A1 food retail	1 space/14sqm gfa	372sqm	27	
Sub-total A1			328	
A3 restaurant	1 car space per 4sqm public floor space	111sqm	28	29
Total			356	194

10.4.3 The proposed provision of 194 spaces accords with the Council's maximum parking standard of 356 spaces. The proposed provision is 54% of the maximum standard.

10.4.4 The Highway Authority consultation comments dated 22nd March 2021 stated that the parking provision is appropriate and accorded with the standards.

"I am now content that the proposed car parking provision is appropriate and in accordance with the Wrexham County Borough Parking Standards."

10.4.5 Page 2 of the Guidance Note states

"The car parking standards set out below are maximum standards for each land use category. In accordance with national policy the Council has no minimum parking requirements. In cases where the amount of parking provided is below the maximum the Council will need to be satisfied that this is appropriate for the likely level of demand, without undermining requirements for inclusive access." (ADL underlining)

10.4.6 The parking standards are clearly maximums and there is no minimum parking requirement. This was also clearly the opinion of the Planning Authority in determining the University scheme.

10.4.7 The guidance on parking for new development states that;

"Some on-site parking is likely to be required for most new developments. Developers should clearly demonstrate that the amount of parking provided will be sufficient to meet likely demand and show they have taken account of how close a site is to employment, local facilities such as shops and frequency of public transport."

10.4.8 I have demonstrated with the parking surveys that sufficient car parking would be provided.

10.4.9 The guidance states that parking close to local services and facilities or which is accessible by no car modes may be provided with less on-site car parking to allow a more efficient use of land and higher density development.

“Where developments are close to local services and facilities and/or are in areas where people are able to walk or cycle to them or travel to them easily by public transport, it may be appropriate for less on site parking to be provided than for developments in remoter areas. When determining the amount of parking required for each development consideration will also be given to how close a site is to public car parks, whether those car parks can cater for additional demand, as well as whether there are any existing parking problems in the locality.

In areas where people can easily travel to sites by means other than by car, reducing the amount of space dedicated to car parking could allow land to be used more efficiently by enabling a higher density development or to provide landscaping to enhance the appearance of an area.”

10.4.10 The proposed development is located within the Retail Park and is accessible by walking, cycling and public transport. Therefore, the site is located in an area where a reduced level of parking is appropriate. This was also the view of the Planning Authority when reviewing the University application. I have demonstrated that the part of the car park proposed to be redeveloped is lightly used and therefore the proposals would more efficiently utilise the site.

10.4.11 The proposal accords with the Local Planning Guidance Note 16: Parking Standards.

10.5 Summary

10.5.1 The above assessment and conclusions all have been based on the analysis of evidence and clearly demonstrate the second reason for refusal is not justifiable, technically without foundation and has no planning merit to support the refusal of this application.

11.0 PLANNING POLICY ASSESSMENT

11.1 Planning Policy Wales Edition 11 (February 2021)

11.1.1 Planning Policy Wales (PPW) was updated in February 2021. This document sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs), including TAN 18: Transport. Chapter 4.0 of PPW covers the theme of 'Active and Social Places' and the transportation components of place making. I have considered the relevant transportation policies.

11.1.2 Paragraph 4.11 states that the location of development should enable shorter and more efficient, sustainable journeys and improve choice in travel modes:

“The planning system should enable people to access jobs and services through shorter, more efficient and sustainable journeys, by walking, cycling and public transport. By influencing the location, scale, density, mix of uses and design of new development, the planning system can improve choice in transport and secure accessibility in a way which supports sustainable development, increases physical activity, improves health and helps to tackle the causes of climate change and airborne pollution by:

- *Enabling More Sustainable Travel Choices – measures to increase walking, cycling and public transport, reduce dependency on the car for daily travel;*
- *Network Management – measures to make best use of the available capacity, supported by targeted new infrastructure; and*
- *Demand Management – the application of strategies and policies to reduce travel demand, specifically that of single-occupancy private vehicles.”*

11.1.3 The proposal is located on a site which is accessible by walking, cycling and public transport and benefits from the existing infrastructure which currently serves the Plas Coch Retail Park. Locating the proposed restaurant on the Retail Park facilitates linked trips and trips by customers already on the road network which therefore reduces the need to travel. The proposal would have no material impact on the capacity of the local road network and new pedestrian/cycle infrastructure improvements would be provided which would enhance the accessibility of the site by non-car modes.

11.1.4 Paragraph 4.1.10 states that to encourage sustainable transport, development should be facilitated which integrates with existing land uses:

“The planning system has a key role to play in reducing the need to travel, particularly by private car, and supporting sustainable transport, by facilitating developments which:

- are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car;*
- are designed in a way which integrates them with existing land uses and neighbourhoods; and*
- make it possible for all short journeys within and beyond the development to be easily made by walking and cycling.”*

11.1.5 The site is accessible without the need for a car and the provision of the restaurant within the Retail Park is an appropriate integration of land use.

11.1.6 Planning Policy Wales (para 4.1.11 and 4.1.30) states that new development should prioritise active travel and active travel improvements as mitigation.

4.1.11 *Development proposals must seek to maximise accessibility by walking, cycling and public transport, by prioritising the provision of appropriate on-site infrastructure and, where necessary, mitigating transport impacts through the provision of off-site measures, such as the development of active travel routes, bus priority infrastructure and financial support for public transport services. Importantly, sustainable transport infrastructure and services should be prioritised and put in place from the outset, before people have moved in and travel patterns have been established.*

4.1.30 *New development places additional demand on transport infrastructure and networks, with the location, layout and design of development affecting the distance and way in which people travel. Developing local active travel networks can help to mitigate the impact of new development, by providing an alternative mode of travel to the private car, particularly for shorter journeys. Provision for active travel must be an essential component of development schemes and planning authorities must ensure new developments are designed and integrated with existing settlements and networks, in a way which makes active travel a practical, safe and attractive choice. As outlined in paragraph 4.1.11, active travel infrastructure should be put in place early on in a development, and before the people living there move in, to support active and healthy travel patterns from the outset.*

11.1.7 Appropriate on-site infrastructure is proposed to facilitate pedestrian routes from the Argos/The Range/Iceland car park to the development. Measures to improve active travel are proposed off site to encourage sustainable travel and are complimentary to the Welsh Government's active travel proposals for the A483 Junction 5 and the Berse Road Roundabout.

11.1.8 Planning Policy Wales paragraphs 4.1.49 to 4.1.54 relate to parking. The policy advise that local authorities should; support schemes which keep parking levels down, develop maximum parking standards and apply these flexibly to allow for the provision of lower parking levels.

4.1.49 *Car parking provision is a major influence on how people choose to travel and the pattern of development. Where and how cars are parked can in turn be a major factor in the quality of a place.*

4.1.50 *A design-led approach to the provision of car parking should be taken, which ensures an appropriate level of car parking is integrated in a way which does not dominate the development. Parking provision should be informed by the local context, including public transport accessibility, urban design principles and the objective of reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. Planning authorities must support schemes which keep parking levels down, especially off-street parking, when well designed. The needs of disabled people must be recognised and adequate parking provided for them.*

4.1.52 *Local authorities should develop an integrated strategy on parking to support the overall transport and locational policies of the development plan. Local authorities should consider parking issues on a joint basis with neighbouring authorities. They should jointly establish maximum levels of parking for broad classes of development, together with a threshold size of development above which such levels will apply. These maximum standards should be set in collaboration with interested organisations. Local authorities will need to ensure that their parking standards reflect local transport provision, are adopted by individual authorities as supplementary planning guidance, and are kept under review. Parking standards should be applied flexibly and allow for the provision of lower levels of parking and the creation of high-quality places.*

11.1.9 The proposed provision in parking below the Council's standards has been justified and is in accordance with the Planning Policy Wales policy to keep parking levels down.

11.1.10 The proposal accords with the Planning Policy Wales guidance.

11.2 TAN 18: Transport (March 2007).

11.2.1 Technical Advice Note (TAN) 18: Transport (March 2007) provides supporting information for Planning Policy Wales. I have considered the guidance relating to parking is relevant to this Appeal.

11.2.2 Paragraph 4.1 relates to parking and its effect on influencing the choice of means of transport and efficiency of use of land.

4.1 *The availability and price of car parking are key elements in managing car use and a major influence on the choice of means of transport. Car parking can take up large amounts of space in developments, which decreases density and therefore, can represent an inefficient use of land. It can also generate considerable additional trips if located in an area without public transport. Poor design and layout of car parking can also make it more difficult to provide effective, walking, cycling and public transport links.*

11.2.3 The proposed redevelopment of the car park will increase the density of development in the Retail Park. The parking surveys have demonstrated that there is a level of car parking which is surplus to demand so the proposals would more efficiently use the site.

11.2.4 Paragraph 4.13 relates to the implementation of parking within new developments. Flexibility in the application of maximum parking standards is permitted at the Developers discretion.

4.13 *Where appropriate, the local parking strategy should link parking levels on new development sites with either the existence or introduction of on-street control regimes. Maximum parking standards should not be applied so rigidly that they become minimum standards. Maximum standards should allow developers the discretion to reduce parking levels. However, a particular concern with reduced on-site parking is the potential for problems associated with ‘over-spill’ parking. Local planning authorities when developing the local strategy or applicants when undertaking a transport assessment should assess the extent of existing on-street parking pressures and the impact of new development. Where on street space is at a premium, local planning authorities could seek contributions from developers towards the implementation of on-street parking controls or refuse permission for developments where despite controlled parking, unacceptable road safety or congestion issues will probably remain.*

11.2.5 The proposed parking provision accords with the Council’s maximum parking standards and I have provided evidence from three separate parking surveys which demonstrate that no overspill parking would occur.

11.2.6 The proposal accords with the TAN 18 guidance.

11.3 Wrexham Unitary Development Plan 1996 – 2011 (Adopted 2005)

11.3.1 The Wrexham Unitary Development Plan (UDP) was adopted in February 2005. I have addressed Policies GPD1(d) and T8 cited in the reasons for refusal in Chapters 9.0 and 10.0. This section considers other relevant text from the UDP.

11.3.2 Policy T9 relates to walking, cycling and horse riding routes and states:

“Policy T9 Development proposals will be required to provide walking and cycling routes, where feasible and appropriate, that link with existing or proposed walking and cycling routes, and integrate with the public transport system. Opportunities for horse riding along these routes will be secured where appropriate.”

11.3.3 The proposal would improve access by walking and cycling to the site and link with the existing infrastructure which currently serves the Retail Park. This would also improve access to the local bus stops. Horse riding is not considered appropriate in this location. The proposal accords with Policy T9.

11.3.4 The proposal accords with the Wrexham Unitary Development Plan (UDP).

12.0 SUMMARY AND CONCLUSIONS

- 12.1 Planning application P/2019/0919 was submitted to Wrexham Borough Council on 12 December 2019 for the erection of a free-standing restaurant with drive thru facilities, car parking, landscaping and associated works on land at Plas Coch Retail Park, Wrexham. The application was supported by an extensive scope of transportation work provided by ADL Traffic and Highways Engineering Ltd. There was consequently no objection to the planning application by either the Highway Authority or Welsh Government. Notwithstanding the technical agreement with the Highway Authorities the application was refused by Members on 7th June 2021. Reasons 1 and 2 relate to highways matters.
- 12.2 The road network in the study area comprises of; the Retail Park Roundabout, Plas Coch Road Roundabout, Berse Road Roundabout and A483 Junction 5 Roundabout. These have been designed so that traffic can stop and give way to circulating vehicles. The signalised roundabouts hold and release vehicles in a deliberate manner. Queues are an integral design feature. There are no free flow conditions which occur on this section of the road network. The level of existing queueing at the roundabouts has been surveyed (see Section 2.2) and although queues occur as intended the survey results do not indicate that these queues are currently significant or problematic. The highway safety situation in the vicinity of the site has also been reviewed (see Section 2.3) and there would be improvements provided for pedestrian safety.
- 12.3 The existing car park which serves the Argos/Range/Iceland comprises of 235 spaces. The part of the car park proposed to be redeveloped comprises of 70 spaces. ADL have commissioned three separate surveys of the car park (see Section 2.5). During the busiest periods on a Saturday the occupancy was between 95-138 vehicles (40-58% - see Table 2D). The part of the car park (70 spaces) proposed to be redeveloped is currently lightly used with between 9-19 vehicles parked (see Table 2E). This is why it is considered that this part of the car park is suitable for redevelopment.

- 12.4 There have been a number of studies of the local road network undertaken on behalf of the Highway Authority and Welsh Government (see Section 3.1). There have also been studies to support two local committed and parallel developments in the vicinity of the site (the redevelopment of the University site and the proposed 455 residential units on Mold Road). There is funding in situ and proposals developed by the Welsh Government to improve the A483 Junction 5 and Berse Road Roundabouts although this scheme is now subject to independent Review (see Section 3.2).
- 12.5 The Council and Welsh Government therefore have extensive and detailed understanding of the operation of the local road network and potential queuing situation. The Welsh Government has also identified that the A483 junctions do not operate in isolation and that capacity improvements at the A483 Junction 5 are largely dependent on the improvement of the traffic situation at Junction 4. The capacity issues which have been identified with the local road network are therefore independent of and outside the scope of the McDonald's planning application. The predicted performance of the roundabouts has also not precluded other development coming forward as the Council and Welsh Government have been content to allow the University scheme and have no objection to the Mold Road residential scheme (subject to suitable mitigation).
- 12.6 There is therefore some uncertainty of the exact layout of the network in the future 2036 scenario. If the Mold Road scheme is permitted suitable mitigation would be expected to be implemented. If the Mold Road scheme does not come forward then neither will the associated level of traffic. If the Welsh Government scheme comes forward then this has been acknowledged by the Highway Authority as beneficial. If the Welsh Government scheme does not come forward then this has been an independent decision by the Welsh Government. The important point to note from all these scenarios is the McDonald's application has been assessed and is acceptable in planning terms in all of these situations.
- 12.7 The proposal is for a McDonald's restaurant with drive thru facilities. The proposal would provide 194 shared car parking spaces (total) for the Argos/Range/Iceland and McDonald's customers. This is an overall reduction of 41 spaces (see Table 4A).

12.8 Vehicle access to the restaurant would be via the Retail Park Roundabout and the Access Road which serves the existing Argos/Range/Iceland car park. Pedestrian access has been subject to an independent Stage 1 Road Safety Audit and all matters raised have been addressed. The proposed improvements include a new signalised pedestrian crossing facility on Plas Coch Road.

12.9 The proposed delivery strategy for the restaurant has been set out in a Delivery Management Plan which would be a condition of any planning consent (see Section 4.4)

12.10 The proposed restaurant traffic has been assessed based on three comparable restaurants. The majority of trips are expected to be existing on the road network or shared with the Retail Park. The proposed traffic generation would be as follows (see Table 4B);

- Am Peak 70 vehicles
- Pm Peak 111 vehicles
- Saturday Peak 119 vehicles

12.11 The traffic impact on the local network has been assessed using the industry standard computer programmes Junctions 9 and LINSIG to model the roundabouts. The results for the Retail Park Roundabout and Plas Coch Roundabout have demonstrated only a worst-case slight increase in queues of a few vehicles on each approach to the junctions during the 2021 situation and likely imperceptible increases in delay of only a few seconds (see Section 5.2). In 2036 there could be some queues on the University Access arm of the Plas Coch Roundabout which was acknowledged to be likely to occur in any event. The impact at the Berse Road and A483 Junction 5 Roundabouts would also be an increase in queues of a few vehicles on any approach in all scenarios which could be accommodated onto the network. Again, the worst-case level of potential delay of less than 20 seconds would be unlikely to be perceptible in the course of a journey (see Section 5.3).

12.12 The expected peak hour traffic impact of the restaurant at the junctions would be 4.9-6.2% at the Plas Coch Roundabout and 1.7-3.5% at the Berse Road Roundabout and 0.07-0.9% at the A483 Junction 5 (see Table 5H).

- 12.13 The parking assessment of the impact of the development has demonstrated that there would be 28-42 spaces available within the car park during the busiest periods on a Saturday (see Section 6.1). There would therefore be more than sufficient car parking to accommodate the expected level of demand and allow for small scale fluctuations in peak demand without any overspill parking.
- 12.14 The traffic assessment has been subject to sensitivity testing. The level of assumed traffic growth in 2036 (17-18%) has been demonstrated to be unlikely to occur as background flows have been static since 2013 (see Table 7A). The proposed traffic generation has also been reviewed using the industry standard methodology (TRICS). This has resulted in a higher level of potential traffic generation during the Saturday peak (150 vehicles compared to 119- see Table 7D). However even if this was the case then the additional traffic could be accommodated with no material impact.
- 12.15 The opinions of the Council relating to the impact of additional traffic and the application of maximum parking standards expressed in relation to the University redevelopment planning decision are inconsistent and contrary to those expressed by Members determining the McDonald's application.
- 12.16 It is acknowledged that there is queuing and delay which occurs on the local network. Free flow conditions simply do not exist and have never been intended to exist on this part of the network. However, the traffic situation has not been sufficient grounds to prevent or refuse other developments from coming forward or led the Council to conclude that this would result in the significant or insurmountable exacerbation of existing issues.
- 12.17 The Highway Authority and Welsh Government has spent considerable time and resources assessing the local network independent of the McDonald's application. They have both accepted the conclusions of ADL's Transport Assessments and determined the proposal would have negligible impact on the network. There is no technical reason presented by Members as to why their professional judgements should not be accepted.

- 12.18 The potential effects as a result of the proposed restaurant through increased traffic, pedestrian movements and drive thru queues have all been examined and subject to sensitivity testing. There would be no material impacts.
- 12.19 Mitigation measures are proposed to support the application to improve active travel and pedestrian safety which have been identified through an independent Safety Audit. The proposals to improve active travel also accords with the Welsh Governments aspirations for the local network. Access to the restaurant would therefore be safe and there would be no impact on highway safety. The impact of the restaurant on the convenience of access has been assessed through the traffic modelling and it has been demonstrated that there would be no likely perceptible impact on the convenience of access to the site or Retail Park by motorists compared to the base situations.
- 12.20 The existing site (70 space car park) is lightly used and therefore the rationale for the redevelopment of the site is that it currently represents an inefficient use of land.
- 12.21 The results of three separate parking surveys have demonstrated that there would be sufficient car parking to accommodate the operational requirements of the restaurant and the Retail units and allows for some fluctuation in peak demand. There is no technically justifiable reason why the proposed level of parking is not sufficient. No overspill parking would occur.
- 12.22 The site is in an accessible location which facilitates shared trips with the Retail Park. Measures are also proposed to improve the accessibility of the site for pedestrians. The Council's parking standards are maximum standards and there is no minimum requirement (see Section 10.4). The proposed parking provision of 195 spaces accords with the Council's maximum parking standard of 356 spaces (see Table 10A). Lower levels of parking are acceptable in accessible locations and where the level of parking has been justified. The proposal to more efficiently utilize the site with a higher density development also accords with the parking standards policy.

- 12.23 I have therefore comprehensively demonstrated that all my assessments and conclusions have been based on the analysis of evidence and clearly demonstrates that there is no technically justifiable basis or planning merit to either Reasons 1 or 2 for the refusal of the planning application.
- 12.24 My evidence has shown that the conclusions reached by the Highway Authority and Welsh Government are technically sound.
- 12.25 The proposal accords with Policy GDP1(d), T8 and T9 of the adopted Wrexham Unitary Development Plan and LPG No 16 Parking Standards. The proposal accords with the Welsh Government guidance and TAN 18: Transport.
- 12.26 I conclude that there is no technically justifiable reason why the planning application should have been refused on transport grounds. It is requested that the Inspector does not dismiss this Appeal on traffic, transport, parking or highways grounds.