

Transport Assessment

Proposed Residential Development

68 High Street Coedpoeth

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Introduction

A planning application P/2020/0638 was submitted to Wrexham County Borough Council in October 2020. The application was refused by WCBC officers on 15 March 2021.

An appeal to the Welsh Government Planning Inspectorate was then refused on 05 July 2021. One of the reasons for refusal was on highway grounds; the Inspector considered the proposal would cause significant harm to highway safety.

This report provides an assessment of the traffic aspects of the revised proposal and responds to the points of concern raised by the Inspector.

Development proposals

The site is located east of the Police Station on the A525 High Street, Coedpoeth. The A525 is a classified highway currently subject to a 30mph speed limit.

It is proposed to erect one detached dwelling on the site to replace the existing garage.

Two parking spaces are to be provided for the dwelling utilising the existing established vehicular access on to the A525.

Local highway assessment & Planning Inspectors Report

The site is currently occupied by a single garage set 13m from the back of footway adjacent to the A525 carriageway. There is a car parking area of approximately 80 square metres between the existing garage and the back of footway. There is space within the car parking area for a minimum of 3 standard size cars as well as one additional vehicle in the garage.

The garage is not linked to any existing parking provision in the locality and is currently used for storage.

In its current format the site has a potential to park up to 4 vehicles off road at any one time. As there is limited turning facility at the site each of these four vehicles would have to reverse through the existing site access.

The aerial photograph below from 2009 shows 2 cars and a box van on site and proves previous traffic usage of the site.



A second photograph shown below is actually taken from the WCBC planning appeal statement and shows two vehicles parked at the site.



The council highway department has no control over how many vehicles currently park on this site and therefore no control over current vehicular movements using the existing access.

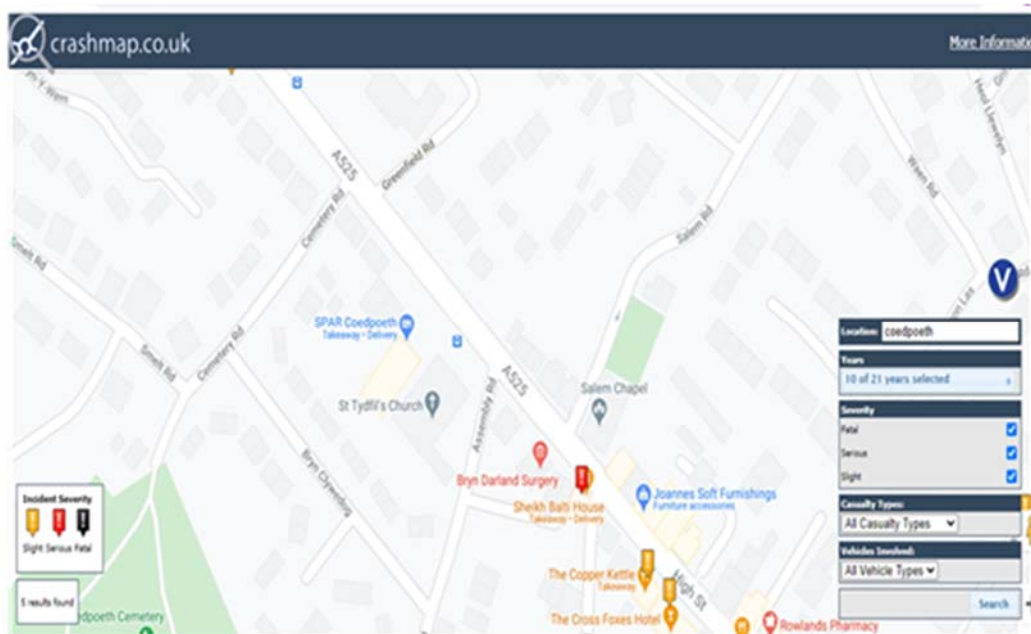
The site owner has confirmed that the garage is currently used for storage and is used on a daily basis, usually in the morning and evening peak hours. This equates to a minimum of 4 traffic movements per day (2 inward and 2 outward).

Interrogation of the TRICS database traffic generation for a single dwelling in a sustainable location would produce a figure of between 4 and 6 movements daily. Appendix A (page 2 para. 3.5) is a transport assessment taken from a site granted planning permission in Coedpoeth a few years ago - it demonstrates that the highway department accepted that daily trip rate of less than 6 per dwelling (actual figure was 5.677) for a site less than 300m from the current site.

It must of course be remembered that the traffic movements out of the site are totally uncontrolled at the current time. When assessing traffic movements through the planning system it is standard practice to evaluate the site on its potential movements not on its current usage. This site has potential for a minimum of 4 vehicles to parked within the site and therefore a traffic generation potential well above that of the proposed dwelling.

The Council highway officer expressed concerns that visibility at the existing access is substandard due to limited visibility in a north westerly direction measured along the nearside kerb edge of the adjoining highway. This is due to the presence of BT boxes, a street light, and the pillar of a boundary wall.

A study of Crashmap reveals that despite the lack of turning and substandard visibility there are no personal injury accidents within 50m of the site in the last 10 years.



There is no reason therefore for the access location to be considered dangerous.

As any highway development control engineer will be fully aware there is guidance available for highway consultancies when preparing transport assessments. The document below states that any highway assessment should provide evidence of personal injury traffic for the last 3 to 5 years. That evidence was provided at the appeal and demonstrated zero accidents within 50m of the site access.



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- for the study area, establish the current personal injury accident records for the most recent three-year period, or five years if this is considered to be more appropriate;

However, in her planning report the inspector stated that it did not follow that the lack of recorded accidents meant that the road was considered adequate and safe; instead preferring to hypothesise that there may be near issues there which don't get reported.

Welsh Government Inspectors at appeals have historically required appellants to provide evidence-based assessments to accompany their appeal statements so it is unconventional for an inspector to

hypothesise that there may have been near misses at the site, as it goes against the advice literature given out by Government departments.

It is also important to note that in response to a recent planning application (P/2021/0680) at Westminster Drive in Wrexham, the highway engineer used a Crashmap review of accident records to justify his reasons for supporting the use of a junction which is below current design standards.

The main area of concern from the Inspector appears to be the fact that vehicles leaving the site would be expected to reverse out in to the highway. (See para. 10 of the Inspectors decision)

The appellant has now provided video footage to the highway and planning department demonstrating that it is actually feasible to turn a vehicle within the site boundary and leave the site in a forward gear. Despite the site dimensions not meeting the guidance on required turning space, it has been proven that it is actually feasible to turn vehicles in the parking area to the front of the proposed dwelling.

Paragraph 10 refers to 'insufficient space to allow for vehicles to exit the site in a forward gear, Vehicles reversing would have reduced visibility of pedestrians and vehicles on the highway...'

As vehicles can leave the site in a forward gear then it stands to reason that the concerns raised by the Inspector have been addressed.

The inspector also questioned whether the site was in fact in a highly sustainable location

Wrexham Council Brough Council submitted their Local Development Plan to the Welsh Government in 2020. It contained the following information about Coedpoeth:

5. Settlement Hierarchy

5.1 Section 4 outlined the approach taken in assessing the function, development opportunities and constraints associated with the settlements within the County Borough. The following section sets out the settlement hierarchy, as well as providing information on the methodology used to inform it.

5.2 The assessment of the individual settlements is presented in a spread sheet which can be seen in appendix 4.

5.3 The settlement hierarchy follows a five-tier approach.

Tier 1: Primary Key Settlement – Settlement which has a critical role to play in the success of the region, and which acts as an important local service and employment centre for surrounding settlements and rural hinterlands.

Tier 2: Key Settlement –Settlements which support communities, but which are dependent upon the Primary Key Settlement for some key amenities.

Tier 3: Local Service Centres – Settlements which have relatively good accessibility by non-car modes.

Tier 4: Minor Village – Limited facilities with some access by non-car modes.

Tier 5: Hamlet – No services and limited or no access by non-car modes.

5.8 Using the methodology outlined above the settlements that make up the County Borough are arranged into the following Settlement Hierarchy:

Settlement Hierarchy Settlement
Tier 1: Primary Key Settlement (33+)
Wrexham Town 33
Tier 2: Key Settlement (24-32) 9 point range
Acrefair/Cefn Mawr 26
Chirk 28
Coedpoeth 25

Appendix 4 - Settlement Function and Development Potential spreadsheet

	Acrefair/Cefn Mawr	Bangor	Beaumaris	Bettisfield	Bradley	Broughton	Brymbo	Burton	Bwllegwyn	Chirk	Coedpoeth	Cross Lanes	Doliver/Llywmar	Franspyle	Garth	Glyn Ceibog	Gretford/ Marford	Gwersyllt	Gwynfryn	Haleon	Hartner	Holt	Horsman's Green	Llanarnan DC	Llay	Mardred		
Settlement Function																												
Employment/ Economic Opportunities & Function																												
Employment Area Located in the settlement limit / distance to nearest employment area	3	2	2	2	2	2	3	2	2	2	3	3	2	2	2	2	1	2	3	2	2	2	2	2	1	3	2	
Employment Land Review	2	1	1	1	1	1	3	1	1	1	3	3	1	1	1	1	1	3	1	1	1	1	1	1	1	3	1	
Services																												
School	2	2	1	1	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	
Health Care Provision	3	3	1	1	1	1	3	3	1	1	3	3	1	1	1	1	3	3	3	1	1	3	1	1	1	1	3	1
Retail Provision	3	1	1	1	1	1	2	1	1	1	2	2	1	1	1	1	1	2	3	1	1	1	2	1	1	1	2	1
Other facilities	3	2	1	1	1	1	2	1	1	1	3	3	1	2	2	1	2	3	3	1	1	1	2	1	1	1	2	2
Key Regional Facilities																												
Public Transport Provision (bus)	3	2	2	1	3	2	3	3	1	2	3	3	2	1	1	1	2	3	3	2	1	1	2	1	1	1	3	2
Public Transport Provision (train)	2	1	2	1	2	1	2	2	1	1	3	1	1	1	1	1	1	2	3	1	2	1	1	1	1	1	2	1
WG/Sustrans Active Travel Route Mapping	3	N/A	N/A	N/A	N/A	N/A	N/A	3	N/A	N/A	3	3	N/A	N/A	N/A	N/A	N/A	3	3	N/A	N/A	N/A	N/A	N/A	N/A	3	N/A	N/A
Walking/ cycling	2	2	1	1	1	1	1	1	1	1	3	2	1	1	1	1	2	3	2	1	1	1	2	1	1	1	2	2
Total Score	20	16	12	10	13	12	21	20	20	12	28	25	11	11	12	11	15	24	29	11	11	13	15	10	10	23	14	
Settlement Hierarchy Tier	2	3	4	5	4	4	3	3	5	4	2	2	5	5	4	5	3	2	2	5	5	4	3	5	5	2	4	

The LDP excerpts demonstrate that WCBC Planning Department undertook an in-depth assessment of Coedpoeth as part of the LDP proposals.

The settlement sustainability scores demonstrated in Appendix 4 above show that Coedpoeth scores 25 points and appears in Tier 2

Coedpoeth is recognised in the LDP as a Tier 2 settlement and considered therefore to be highly sustainable and a suitable location for further development. Given the sustainable nature of the site residents will be able to make use of the numerous facilities within easy walking distance which include schools, dentists, doctors, public houses, fast food takeaways, coop and spar local stores and a pharmacy.

The availability of a regular bus service in close proximity to the site ensures that there is no essential need to own a car to reach everyday destinations.

There is an industrial estate within a 10-minute walk offering employment opportunities.

This should resolve concerns raised by the inspector that the village is somehow unsustainable. The traffic generation figures for such a development would therefore comfortably sit within 4 to 6 movements per day mentioned in the original highway statement.

When assessing planning applications for housing developments in recent years the highway officer has accepted a traffic generation figure of less than 6 per dwelling for a site in Coedpoeth less than 300m from the existing site

It would therefore be perfectly reasonable to accept that a single dwelling will generate a similar figure.

The figure of 6 is not an unreasonable number in comparison to the potential generation from the existing site; and importantly there is no control over vehicle numbers at the existing site. There is also clear photographic evidence of three cars being parked there from a number of years ago. It is therefore concluded that the traffic generation from the current and existing usage are likely to be very similar. The main advantage with the proposed dwelling is that with two parking spaces vehicles are able to turn round within the site and leave in a forward direction.

The inspector theorised that the new dwelling would attract visitors; that is of course highly probable but there is no likelihood that they will park on the road due to the double yellow road marking restrictions and it is unlikely that they would park on the site itself.

Visitors to the new dwelling are likely to utilise the free public car park just 50m away on Park Road.

The inspector accepted that the existing site has potential for 'more than two vehicles to be parked within the site which could generate an unrestricted number of movements. The photographic evidence of course proves this.

Despite acknowledging this the inspector then chose to ignore the potential of the site in favour of its current use. The transport part of the planning process requires that you look at the potential use of the site compared to its proposed use. You should not be looking at the current use but the potential use.....i.e. A potentially controlled number of movements from potentially 4 vehicles all reversing in to the carriageway versus a controlled number of vehicles turning within the site and leaving in a forward direction.

Clearly the potential for at least 3 vehicles to use the external parking area, if each left just once a day would still equate to 6 movements; equal to the new dwelling and certainly no more onerous

The premise that a single dwelling on this site would cause significant harm to highway safety does not stack up against the evidence available.

The proposed dwelling will have two car parking spaces. Given previous planning appeal decisions on car parking standards and Welsh Government guidance which recommends reducing the need

for cars then there is no justifiable reason to object on the grounds of inadequate parking provision. It is therefore contended that 2 parking spaces will adequately serve the proposed dwelling.

Conclusion

- Photographs prove that there is potential for a minimum of 3 vehicles to currently park on the application site.
- The highway authority has no control over the potential number of vehicle movements through the existing access all of whom would need to reverse out of the site
- The potential traffic generation from the existing site usage could be in excess of the traffic generated by the proposed dwelling.
- Although there is a shortfall in visibility in one direction, the traffic generation is no more onerous than the potential generation from the existing site and means that there is no reason to object on these grounds.
- The village of Coedpoeth has been assessed by WCBC planning department through the LDP process as being in a highly sustainable location close to all the village facilities and near to a regular bus route. The two parking spaces proposed are therefore adequate for the proposed dwelling.
- Due to the proximity of the site to a regular bus service and so many local leisure and employment opportunities than traffic generation for a new dwelling is likely to be no more than 6 per day.
- Evidence has been submitted to show that WCBC highway officers supported a residential housing development less than 300m away from the current site and accepted a traffic generation of less than 6 per day per dwelling.
- Traffic generation from the proposed dwelling is likely to be no more onerous than for its existing potential use for which there is no turning facility provided.
- Therefore, there is no justification to object due to the lack of turning facility.
- Visibility at the access will be maximised if the front boundary wall pillar is reduced to below 1m in height.

The main issue stated by the Inspector was the lack of turning facility to the front of the proposed dwelling. That issue has now been resolved by the submission of video footage proving that vehicles are able to turn in the curtilage of the site. There is now therefore considered to be no reasonable justification for the highway department to object to this proposal on the grounds of traffic generation or lack of parking and turning.