

1 INTRODUCTION

1.1 Preamble

1.1.1 Prime Transport Planning Ltd (Prime) have been provided with comments from Wrexham County Borough Council (WCBC) Highways Development Control dated 16th December 2019. These comments were made in relation to the Transport Assessment (TA) prepared in support of an outline planning application (ET/DC/P/2019/0877) for a proposed commercial development located off Oak Road on Wrexham Industrial Estate (WIE). The development has an access point onto Oak Road. The parcel of land comprises B1 and B2/B8 usage, totalling 21,700sqm, broken down into:

- Plot 1 (B1) – 4,000sqm
- Plot 2 (B1) – 5,000sqm
- Plot 3 (B8) – 4,100sqm
- Plot 4 (B8) – 3,600sqm
- Plot 5 (B1) – 5,000sqm

1.1.2 It is noted that the TA which was reviewed by WCBC had been produced in support of a development which totalled 26,600sqm in size. Amendments have been made in response to statutory consultee comments/requests, and as such the quantum of the development has then reduced to the plot sizes stated above. WCBC should consider this reduction when reviewing this response.

1.1.3 This document has been produced in response to the above-mentioned comments and intends to provide, where possible, the information and clarification requested by WCBC.

1.1.4 WCBC's comments are provided in *red italics* below with Primes response in black standard font.

2 RESPONSE TO WCBC COMMENTS

2.1.1 *Point 1: The proposed access takes the form of a simple T-junction. However, based on the submitted TRICs data I traffic flows, DMRB (CD123) would appear to recommend the provision of a right hand turning lane I ghost island.*

2.1.2 It was noted through the original scoping of the development proposal, comments received during pre-application consultation and through comments received in regards the TA, that a roundabout would be the preferred access solution to the proposed development. As detailed within the original

TA, the delivery of this form of access is compromised by a wide strip of 3rd party land that lies between the site boundary and Oak Road. WCBC have acknowledged that such an access would be difficult to achieve without substantial costs being incurred to 3rd party landowners.

- 2.1.3 Please refer to **Section 4.2** of the TA regarding our detailed response to the highway officers' comments relating to the provision of a ghost island/right turn facility to access the site in preference to a standard priority-controlled junction.
- 2.1.4 As **Section 4.2** summarises, given that standard priority controlled junctions are the predominant form of junction within WIE, a low volume of traffic is likely to be generated by the proposed development, and the volume of traffic on Oak Road is substantially less than the requirements in DMRB CD123, the TA concludes that a standard priority controlled junction depicted in **Drawing P19014-001E** is the most appropriate form of access to this proposed development. It is therefore suggested that the provision of a ghost island right turn, and the additional costs associated to its construction, are unwarranted and a costly addition to the development.
- 2.1.5 The conclusions reached within **Section 4.2** of the TA have been further reinforced through the reduction in the overall quantum of the development now being proposed, with the resultant expected AADT flows being even lower than those shown in **Table 4.1** of the TA. **Table 2.1** below shows the expected 2034 AADT flows in the vicinity of the proposed development calculated using the revised levels of development now being applied for.

Table 2.1 – Expected 2034 AADT Flows

Link Description	2034 with Development Flows
Proposed Site Access	1213
Oak Road to the East of Proposed Site Access	4237
Oak Road to the West of Proposed Site Access	4426

- 2.1.6 *Point 2 – I would recommend the provision of a suitable pedestrian crossing / splitter island across the proposed access. The proposed crossing indicated on submitted layout plan (Drg. No. P19014-003) is not considered suitable. This feature is setback too far into the proposed access and is unlikely to be used by pedestrians walking along this side of Oak Road. Revised swept path details will be required to demonstrate that HGVs can access the site without interfering with any revised pedestrian crossing facility in this location*
- 2.1.7 We believe that a given the relatively low levels of traffic likely to be generated by the proposed development and the low levels of pedestrian activity in the vicinity of the site, that a pedestrian crossing comprising dropped kerbs and tactile paving is the appropriate solution to incorporate into the design of the proposed site access.

- 2.1.8 The pedestrian crossing comprising dropped kerbs and tactile paving, was originally positioned in the location shown within **Drawing P19014-003** of the TA as it allowed for pedestrians to cross at the carriageways narrowest point, thus reducing the overall distance pedestrians need to walk across the carriageway.
- 2.1.9 The highway officers' comments have been noted however, and the crossing point has been moved 12m north. This new location can be seen within **Drawing P19014-003B** in **Appendix I** of this Technical Note. The crossing point is acknowledged as being more in line with the natural pedestrian desire line.
- 2.1.10 Point 3- Appropriate dropped kerb crossing points will need to be provided further along Oak Road in order to provide safe pedestrian access to the existing bus stop / shelter on the opposite side of the road.*
- 2.1.11 The client is happy to provide tactile dropped kerbs to aid in pedestrian movements to local bus stops. Prime would like to highlight **Paragraph 4.5.3** of the TA, with the Road Safety Audit (RSA) highlighting that dropped kerbs in close proximity to the nearest bus stop could have visibility obstructed by a waiting bus. Although this bus stop is currently unused, in the interests of future proofing the safety of pedestrians, the proposed dropped kerbs were moved further west to maximise pedestrian visibility.
- 2.1.12 Prime are happy to engage further with the highways officers for them to highlight specifically where they would want a drop kerb crossing provided.
- 2.1.13 Point 4- Any proposed new access in this location will require Stage 1, 2 & 3 Safety Audits. I would recommend that Stage 1 & 2 Safety Audits are submitted as part of any planning application to ensure a safe and satisfactory access can be provided.*
- 2.1.14 A Stage 1 RSA has been completed for this proposed development, this being the appropriate level of audit required at this stage of the planning process. This audit together with a Designers Response have been included within the TA. It should be noted that a Stage 2 RSA will be undertaken as part of the s278 process, this being the appropriate time for such an audit to be undertaken.
- 2.1.15 Point 5- I understand that it is proposed to provide footpath links from the development site to Oak Road and to the existing public footpath (PROW No. 19- Abenbury). I would strongly recommend that you liaise with our Public Rights of Way Section on this matter- contact: Sean Hanratty on Tel:01978 729761. Any proposed footpath links will need to be provided on a suitable layout plan*
- 2.1.16 Please refer to **Section 4.4** of the TA. Through correspondence with Sean Hanratty, it was highlighted to Prime that a short section of the potential connection to Footpath19 fell within 3rd party control. As such, any connection to Footpath 19 has been stated within the TA as potential, to be finalised or agreed following any reserved matters application.

2.1.17 Point 6 - I would recommend that a suitable emergency access is provided from the site onto Oak Road.

2.1.18 An emergency access had been previously shown connecting Oak Road through an area of land which we now understand has some heritage value. Following comments with regard to heritage issues, the area of the site and hence the volume of development proposed for the site has reduced. The reduction of the proposed site area has resulted in there being only one part of the site that now has a frontage to the highway network, this being the point of the main site access. Given this lack of site frontage to the highway a separate emergency access is now difficult to deliver without the need for 3rd party land.

2.1.19 It should however be noted that the need for a separate emergency access is questioned. The site access carriageway is 7.3m wide with 2 x 2m footways also provided. This equates to a cross section of available highway at 11.3m width. Grass verges are also found adjacent to the access road, with these verges further increasing the land available for potential use by emergency services to access the site, in the unlikely event the road is blocked.

2.1.20 Point 7 - The proposed turning head is not laid out to adoptable standards. The proposed factory unit accesses appear to be laid out to a non-standard specification and appear to include trees planted within visibility splays. Based on the submitted layout, we would not wish to adopt such a layout. In this instance, the proposed internal estate road would need to be managed in perpetuity by a private management company

2.1.21 The development is for outline planning, with such matters stated above to be dealt with as part of any reserved matters application.

2.2 Public Transport Provision

2.2.1 Point 6 - Current public transport provision serving the industrial estate is poor. I would strongly recommend that you discuss the proposed development including potential funding for an improved bus service with our Public Transport Officer- Andrew Mytton on Tel: 01978 729760.

2.2.2 Please refer to **Paragraphs 7.2.10 to 7.2.18** of the TA.

2.2.3 A meeting took place on Monday 23rd September 2019, through which Prime was informed that Andrew Mytton has requested £25,000 per year (for 3 years) to fund local public transport services. Prime have attempted to contact Andrew Mytton on numerous occasions over a period in excess of 12 months regarding public transport funding for differing schemes throughout WIE. A response has yet to be received from Andrew as to what scheme he is proposing, or what this requested money would fund.

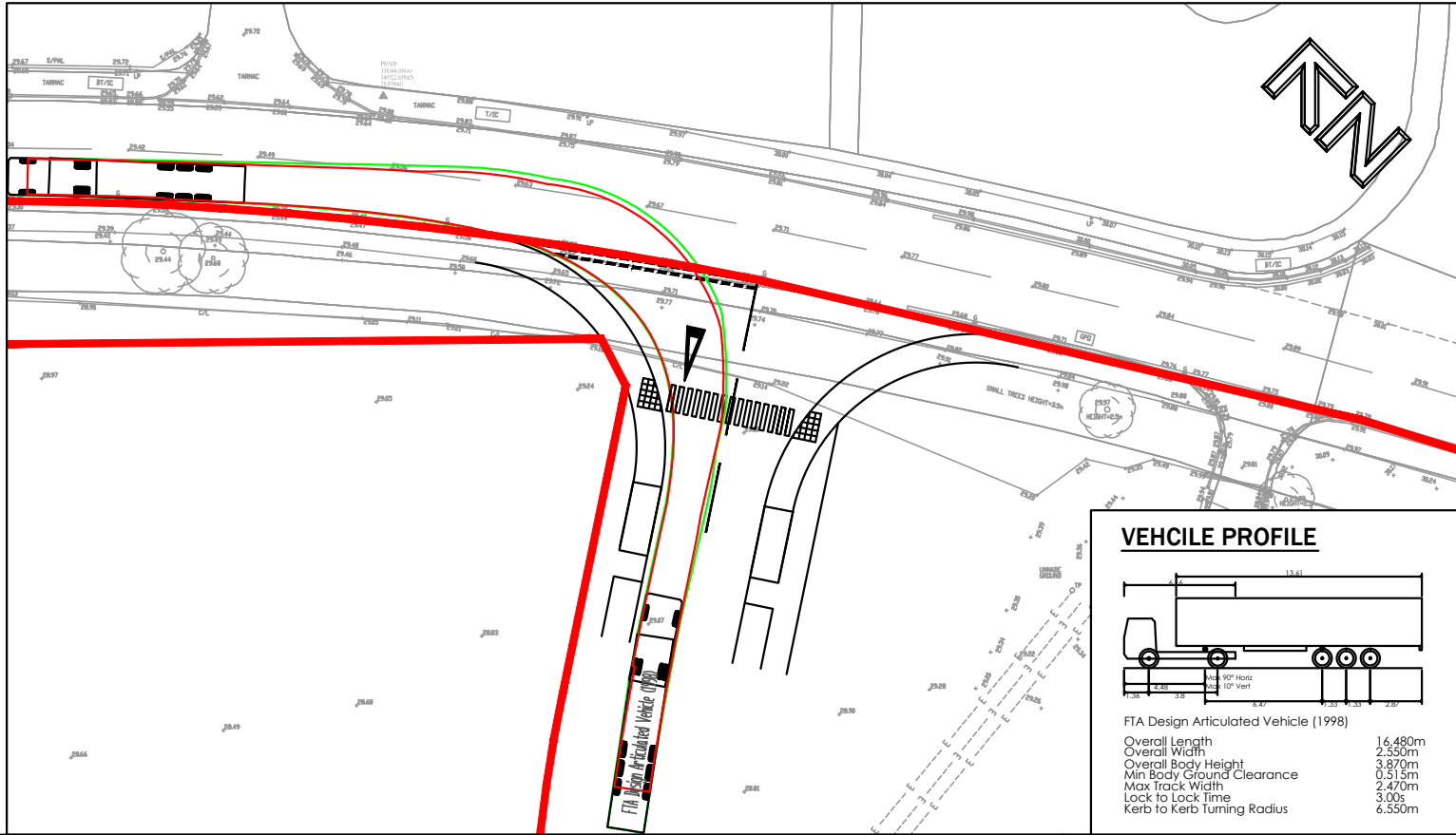
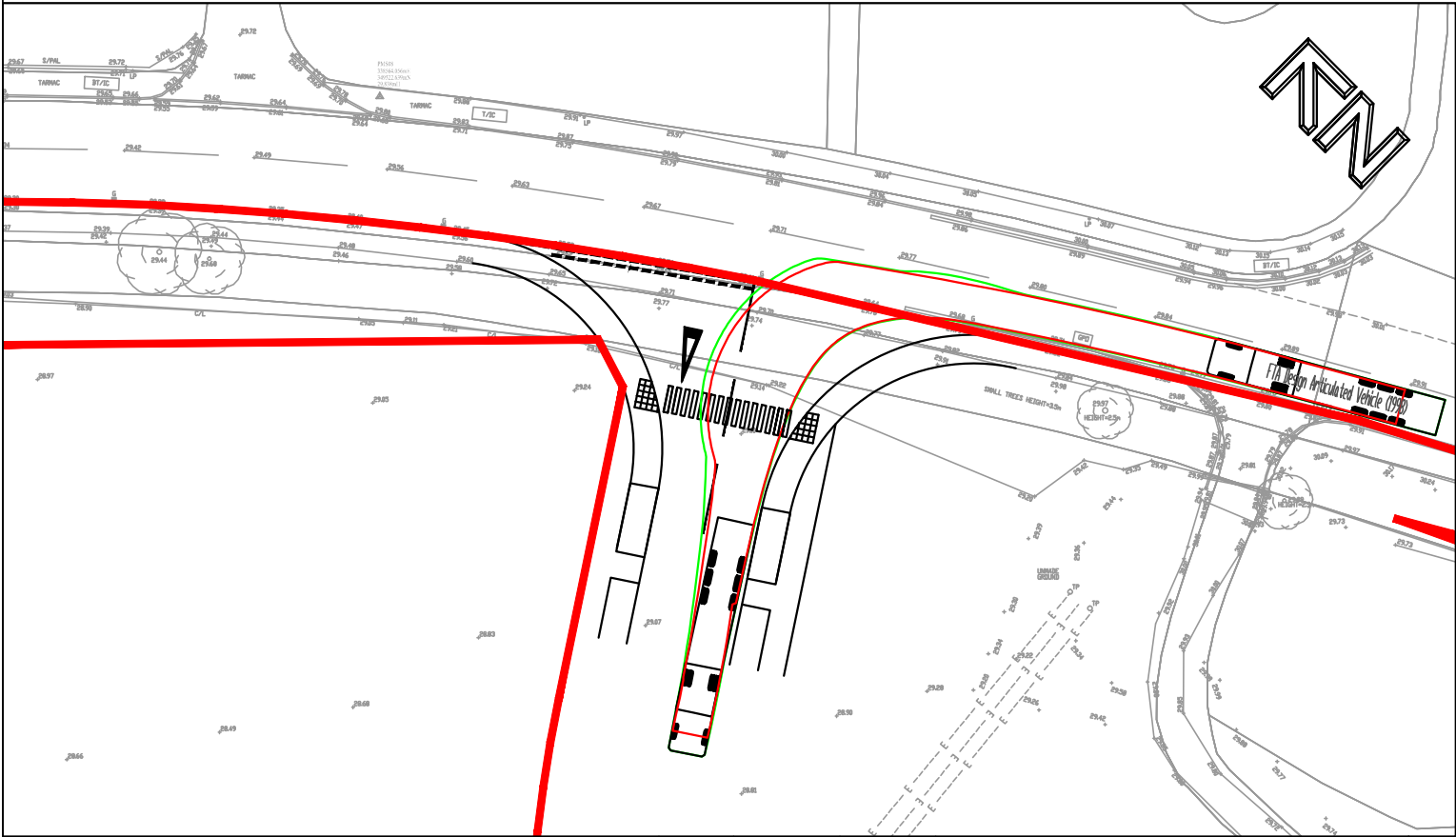
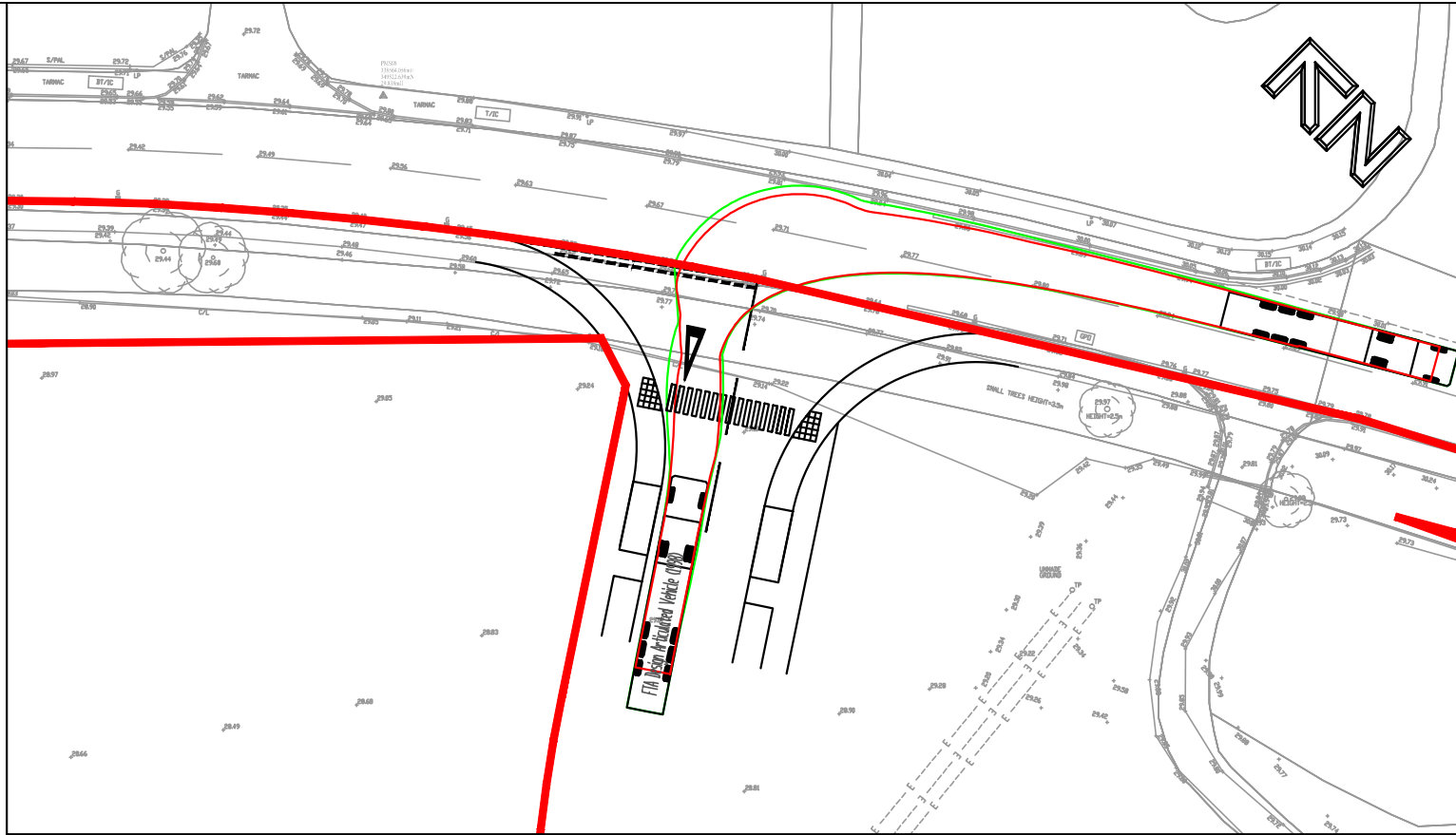
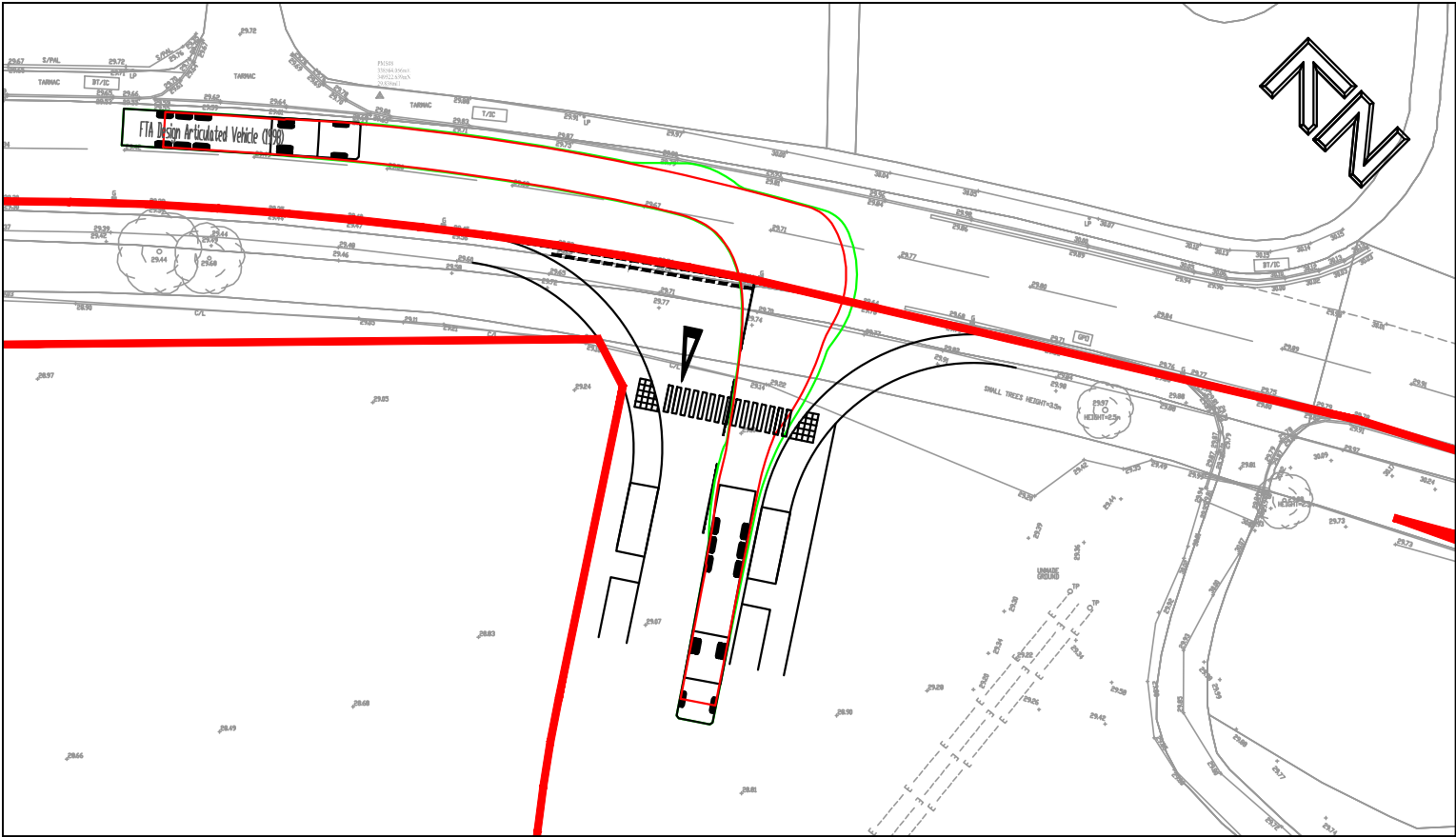
2.2.4 In accordance to PPW 10 and Circular 13/97, and the lack of a clear strategy from WCBC with regard to public transport improvements within WIE, we suggest that the requested contributions are unjust, unrealistic and do not accord with various Transport Policy Initiatives within Wales

3 SUMMARY

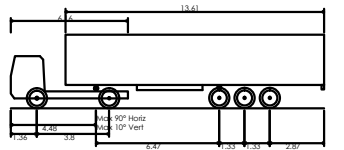
- 3.1.1 This response provides the additional information that WCBC have requested. Prime trust that this response clarifies their position on each of the points raised by WCBC and will allow the scheme to be approved on Highways matters.

APPENDICES

Appendix I Technical Drawing P19014-003B



VEHICLE PROFILE



FIA Design Articulated Vehicle (1998)
Overall Length 16.480m
Overall Width 2.550m
Overall Body Height 3.870m
Min Body Ground Clearance 0.515m
Max Track Width 2.470m
Lock to Lock Time 3.00s
Kerb to Kerb Turning Radius 6.550m



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www.primetp.co.uk | 0151 728 1860

B	14.02.20	AM	PEDESTRIAN CROSSING POINT MOVED WCBC COMMENTS & REVISED SITE BOUNDARY
A	16.10.19	VB	
Rev	Date	By	Revision notes

Status

INFORMATION

Project

THE OAKS, WREXHAM INDUSTRIAL ESTATE

Title

**SWEPT PATH ANALYSIS - ACCESS
ALL MOVEMENTS**

Drawn by
AM

Issue date
14 FEB 2020

Scale(s)

1:500 @ A3

Drawing No

P19014-003B