



Llywodraeth Cymru
Welsh Government

Development Control
Wrexham County Borough Council
16 Lord Street
Wrexham
LL11 1LG

Eich cyf / Your ref P/2020/0649

Ein cyf / Our ref 20/NM-3320

13 May 2021

Dear Sir/Madam,

**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES)
ORDER 2012:**

Former Site of Brymbo Steelworks, Brymbo, Wrexham

Outline planning permission for up to 300 dwellings (class C3 use), a primary school (2-form entry), small district centre comprising up to 1,395 sq.m of class A1 retail, up to 372 sq.m of class A3 restaurant / public house, up to 465 sq.m of class D1 use, multi-functional green infrastructure, including informal open space, surface water attenuation, vehicle accesses, car parking, engineering works, public footpaths and hard and soft landscaping, underground services, and all ancillary and enabling works, with all matters reserved except for vehicular access from Brymbo Road.

Following receipt of the appended Transport Assessment Addendum (TAA) dated 12th March 2021 in respect of the above proposed development, I write to advise that Welsh Government has now completed their review of the submitted information.

Please find appended Welsh Government's response to the submitted TAA under the three following headings;

- 1) Overview
- 2) Detail
- 3) Conclusion

Overview

Further to the Transport Assessment Addendum (TAA) dated 12th March 2021 written by Phil Jones Associates (PJA) for the Brymbo Development Site (Reference Project Code 03499 March 2021).

The TAA provides a comprehensive assessment of the potential impact of the development on Junction 4 of the A483. However, there are a number of assumptions that have been made that cannot be supported.



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The main concern is that the document is presented on the assumption that the Welsh Government (WG) has total control over the traffic signals at Junction 4, both now and in the future, which is not correct.

In addition, the document states that WG will use this power to optimise the signals to ensure queueing back onto the running carriageway of the A483 is avoided at the expense of creating significant queues on the adjacent Wrexham highways. This is not an approach that would be considered to be acceptable by the Welsh Government and it would be likely to cause Wrexham County Borough Council (WCBC) serious concerns.

Details

Specifically addressing comments and evidence within the TAA:

There appears to be no dispute that using LINSIG is an appropriate software to model the traffic signal operation at Junction 4 in isolation.

There appears to be no dispute that the LINSIG models (created by PJA and Mott McDonalds (MM)) both correctly show the existing problems at Junction 4 during the peak hours.

The background traffic growth calculations based on TEMPro are broadly similar between MM and PJA, with numerical differences only appearing as slightly different future years have been used. It should be noted that the MM growth rates are higher than those used by PJA as MM used forecast rates at least 2 years further into the future.

It has been shown that the Base Year LINSIG assessments by MM and PJA using existing traffic are showing some issues during peak times and therefore it is reasonable for WG to conclude that no further development should be approved without the major intervention at Junction 4. This is supported by the TAA in paragraph 2.3.5.

It is noted that within the TA and the TAA that no allowance has been used to reduce the impact of the proposed development through the use of reductions due to diverted or pass-by traffic. It was not considered necessary to account for reassignment of traffic within the wider area as this was addressed separately by the SATURN strategic model used to determine the appropriate improvements to the A483 between Junction 3 and 6.

It is also noted within the TA and TAA that no allowance has been used to reduce the impact of the proposed development because of an anticipated increase in home working. It is noted that currently the WG request is that all who can work from home should work from home, and in the future there now an aspiration by WG to maintain a 30% home working policy. This remains an aspiration, but the Welsh Government does not see it as reasonable to reduce traffic forecasts at this time as a result of this aspiration. Assessment must proceed on the basis of robust evidence.

Concerns have also been raised by PJA within the TAA that:

- The MM technical note only includes the final network summary lines extracted from the LINSIG assessments. Release of the full LINSIG data/output files have been withheld under Regulation 12(4)(e) of the Environmental Information Regulations 2004.



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- NTEM provides background growth that would include some, or all of the committed development, and that therefore no additional sensitivity testing was required by MM. The MM Technical Note was required to consider a possible future scenario based on the anticipated key strategic development sites proposed by WCBC coming on stream as part of the Local Development Plan (LDP) development. This did not include the Brymbo site, which would have placed an additional burden on the operation of Junction 4, but considered the sites considered most likely to come forward and impact directly on Junction 4.
- The Brymbo development was not included in the sensitivity test. The three development sites chosen for the sensitivity test were those most likely to have a significant impact on the operation of Junction 4 and the Technical Note was used to determine what if any development, or part thereof, could be delivered prior to the major intervention at Junction 4.

Given all of the above the TAA has reassessed the impact of the Brymbo Lite development on the surrounding highway network:

- Attempts has been made to consider reassignment to other routes/junctions to avoid Junction 4. However, these are high level and appear to be based on maximum travel speeds without taking account of existing traffic flows and delays on those routes and congested junctions such as Junction 5. (As above, this was addressed by MM via the SATURN assignments used in the WeITAG assessments). It is stated that there are 'suitable' alternatives, but there is no clear evidence provided in the TAA on how drivers will be specifically persuaded to use them or how the figure of 20% that would continue through Junction 4 has been arrived at.
- The TAA maintains that the congestion at Junction 4 will continue to grow and will persuade traffic to 'divert' away from Junction 4 (paragraph 3.3.3), but this is not qualified.
- The LINSIG Tables 4.1 and 4.2 in the TAA clearly demonstrate the poor operation of Junction 4 (in 2030) with delays shown on the A483 SB off slip and the A525 EB and WB.

The TAA Sections 5, 6 and 7 strongly support that Junction 4 is overly congested as these sections look at justifying why traffic would avoid the junction at peak times through avoidance (5 - changed travel patterns), retiming of trips (6 – peak spreading) and not travelling at all (7 - working from home).

Finally a statement was received by the Welsh Government by email on the 20/4/21 regarding the Local Model Validation Report (LMVR) prepared by Mott MacDonald in March 2020 which said: "This LMVR was not available to us during the preparation of our Transport Assessments or the Transport Assessment Addendum, however, it clearly shows at Figure 30 that the model is routing ALL traffic between Brymbo and Wrexham Town Centre AWAY from Junction 4. So, even in baseline conditions, no traffic between Brymbo and Wrexham will use Junction 4."

In response, the LMVR is a report that is used to demonstrate that the computer model of the base year (network and vehicle movements) matches what is actually occurring on the ground (i.e. the observed movements). So, the LMVR only takes account of the fact that traffic is avoiding junction 4 as that is what is happening at the time the surveys were undertaken in 2018. It does not seek to predict what further traffic may do.



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Conclusion

As highlighted earlier in this note WG has concerns about the proposed traffic signal phasing which in seeking to minimise delays on the trunk road would cause significant delays on the WCBC network and hence are unlikely to ever be used. WG is aware that WCBC has similar concerns with the proposed signal timings within the TAA.

Therefore as WG need to maintain the safety and free flow of traffic on the strategic trunk road network, after consideration of the TAA, WG maintains the current direction to refuse the application.

Yours sincerely



Jason Ingram



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