

JRB/18111
19 September 2019

Philip Forster
Development Control
Wrexham County Borough Council
Guildhall
Wrexham
LL11 1AY

Dear Mr Forster,

Application P/2018/0675. Erection of Class A1 retail store and class A1/A3 drive-thru coffee shop, former police headquarters, Wrexham
Response to Highways Objection submitted on behalf of Asda Stores Ltd

I write in response to a letter submitted by TPS on behalf of Asda dated 30th August 2019 in which they raise a number of comments and criticisms in relation to our original Transport Assessment and subsequent Technical Notes submitted in support of Lidl's application at the former police station in Wrexham.

I will address each of the issues raised one by one, if I may, starting with the bullet points listed on page 1 of the letter in which they refer back to the council's initial highway comments and their own concerns raised in an earlier letter submitted to you on 17th September 2018. The issues TPS have raised are as follows:-

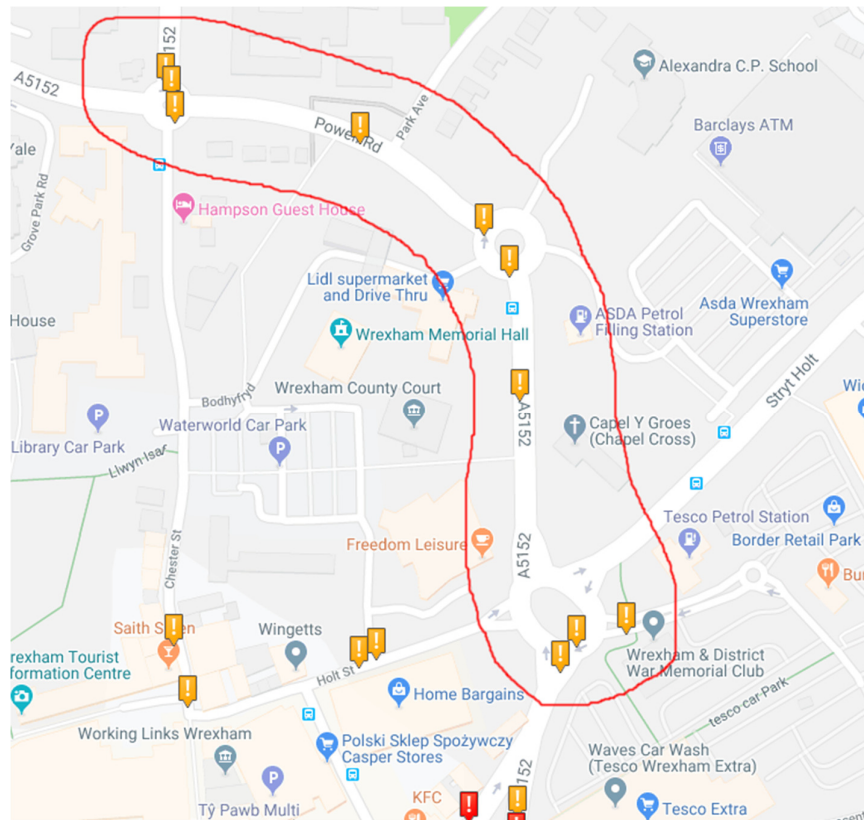
1. That the original TA was based on non-neutral survey data. This is not true. The weekday survey was undertaken on Tuesday 20th March. This is a representative survey day selected from a neutral period of the year unaffected by school holidays. Due to the de-minimis level of traffic generated by a Lidl during the AM peak period, we surveyed and assessed the PM peak only for the weekday. This is routine for discount foodstores and this methodology was accepted by your highways development control colleagues. A comparison between traffic flows on the A5152 either side of the Asda roundabout derived from both the March 20th survey and the later November surveys is provided below. This shows virtually identical levels of traffic between the two survey periods west of the roundabout, and confirms that the March flows were, in fact, higher than the November flows on the A5152 south of the roundabout.

Comparison of March 2018 and November 2018 survey data

	A5152 Powell Rd west of Asda rbt			A5152 Bodhyfryd south of Asda rbt		
	E'bnd	W'bnd	2-way	N'bnd	S'bnd	2-way
Tues. 20 th March, 2018	804	739	1543	740	800	1540
Thur. 29 th November, 2018	726	789	1515	713	685	1398

The Saturday March 24th 2018 survey undertaken at the Asda roundabout constituted the first day of the Easter holidays. For a food retailer, the Easter period is often busier than all other periods of the year with the exception of Christmas. Given the proximity of Asda and Tesco to the application site, we would expect the same relationship to hold true for Wrexham. If we look at the relationship between the Saturday and the weekday surveys at the Asda roundabout from March 2018, we find that the Saturday period is some 7% higher than the weekday PM peak. The November surveys undertaken at the Chester Road/Powell Rd roundabout revealed an equivalent difference of just 10% between the Saturday and the weekday PM peak. This confirms that the survey data from both March and November is perfectly fit for purpose.

2. That accident data should be reviewed for a five year period at the Asda roundabout and the two roundabouts either side. The submitted TA did indeed provide accident statistics for the most recent five-year period at the Asda roundabout and this revealed how safely the junction was performing. If we expand the search to the network either side, we see from Crashmap, that just ten slight personal injury accidents have occurred during the last five years across the entire study area. This suggests, as we have stated in previous submission, that there is no evidence of an existing highway safety issue that would be exacerbated by Lidl's application and therefore no need for any further detailed examination.



Extract from Crashmap for accidents over the period 2014 to 2018

3. That a drawing of the junction layout should be provided including geometries. Appendix 3 of the submitted TA included both 1:250 and 1:500-scale drawings of the proposed site access.
4. That a road safety audit should be undertaken. This exercise was commissioned in November 2018 and the RSA and accompanying Designer's Response were issued to the Council via Technical Note TN01 dated 26th November 2018.

5. That without a restriction on delivery and servicing times, there would be times of the day when servicing vehicles would come into conflict with other vehicles and pedestrians. I assume from this comment (although it isn't stated explicitly) that TPS consider such an operation to be unsafe. And yet, this is the strategy that is employed at the vast majority of Lidl's stores across the UK. Lidl's Warehouse Operations team have confirmed that there have been no incidents involving pedestrians on estate car parks for the entire time that the Runcorn Regional Distribution Centre (the RDC that will service Wrexham) has been open. The RDC was opened in 2002 and serves the whole of the North West and north Wales.
6. That trip rates should be based on TRICS sites that are located in similar areas and that better represent the proposed uses. The sites selected for use in the original 2018 TA are located in a variety of towns and a range of locations within those towns. There has been no evidence presented by either the council or from TPS over the more than 12 months since the TA was submitted that they are unrepresentative of conditions within Wrexham or of Lidl or Costa Coffee. They are precisely the same rates that have been tried and tested across the UK in support of many other Lidl applications and which have been accepted unquestionably by local highway authorities. They are based on recent 2016 TRICS surveys of brand-new Lidl stores across central and eastern England and while Welsh discount foodstore sites may be unrepresented in TRICS, we are satisfied that the trip rates used are nevertheless representative and provide a more than robust test of the site access and offsite roundabouts.
7. That operational assessments should be undertaken at offsite roundabouts. This was provided in Technical Note TN02 dated 19th December 2018.

Under the heading "outstanding concerns" TPS state that no information has been made available in relation to trip rate methodology, road safety or servicing. In relation to trip rate methodology, TPS need to state why it is they consider the trip rates we have employed to be unrepresentative. Since the date of issue, more surveys have been added to the TRICS database for the discount foodstore category. The more recent trip rate data extracted from TRICS 7.6.1 allowing for the inclusion of another six discount foodstores and their surveys provides the trip rates below.

Weekday PM and Saturday Peak Hour Trip Rates (per 100m² RFA)

Discount Food Retail (Similar Lidl Stores)	Weekday PM Peak (1700 – 1800)		Saturday Peak (1100 – 1200)	
	Arrivals	Departures	Arrivals	Departures
Updated Vehicle Trip Rates	6.657	6.965	10.453	9.659
Updated Vehicle Trip Generation	88	92	139	128
<i>Previous trip generation from submitted TA</i>	<i>86</i>	<i>86</i>	<i>146</i>	<i>134</i>

The use of these updated trip rates would result in a total two-way weekday PM peak hour flow of 180. This is just 8 trips more than the 172 used in the submitted TA. For the Saturday period, the more recent TRICS data would produce a two-way flow of 267. This is 13 trips fewer than the volume utilised in the TA. We therefore stand by the approach we have taken towards trip generation and consider the assessments submitted to be completely reliable.

In relation to the drive-thru unit, we note TPS's concern over the proportion of new trips allowed for in our assessment. We had assumed for the PM peak period and the Saturday midday peak, that drive-thru traffic would be exclusively drawn from existing visitors to the retail offer around this part of Wrexham. TPS have not provided any specific advice as to what proportion of new trips they would consider

acceptable. However, from research into the work that TPS themselves produce for other developers, it is apparent that they allowed for 10% of Costa Coffee drive-thru trips to be new to the network in relation to a site of an almost identical scale, though very different in terms of the neighbouring area, up in Barrow-on-Furness, Cumbria.

If we were to allow for the same proportion here, then we would need to add another 2 trips in and 2 trips out in the weekday PM peak and 4 in and out in the Saturday midday peak. I would trust that TPS would accept that this level of additional traffic is de-minimis, particularly given the fact that allowing for more recent Saturday surveys of discount foodstores, the trip rates for the Lidl element of the application site should reduce.

In terms of road safety, I attach a copy of the Stage 1 RSA and our Designer's Response. I trust that TPS have acknowledged the rotation of the drive-thru unit to remove any concerns about traffic queuing from the order window back onto the local highway network. This updated layout will be available on the planning portal. There were no other significant concerns raised. We are not, after all, creating a new arm onto the site access roundabout, but merely widening the existing and improving it to provide pedestrian crossing facilities on the desire line across it.

With regards to servicing, a Delivery, Servicing and Waste Management Plan will be conditioned on any permission granted Lidl. However, the concerns raised by TPS in this regard are not justified in any regard. Lidl's and indeed Aldi's operations rely almost exclusively on servicing through their estates and Lidl, due to the fact that they take all waste away in the same delivery HGV generate far fewer HGV movements than their major competitor. Lidl have a duty in any case under the Health and Safety at Work Act to protect the safety of their employees and customers while on their estate and this is why their safety record is completely unblemished.

I do not know why TPS have produced the table they have at Table 2 of their letter criticising the discrepancy in trip generation levels between the TA and subsequent TNs. The weekday PM peak difference is -4 and so this is immaterial. But they identify a difference of 67 for the Saturday midday peak. It would be clear from a proper examination of the documents, that the 347 two-way trips from the TA is the total in and out of the site access with all drive-thru traffic combined with all discount food retail trips. In the Technical Note, we provided a robust capacity assessment of the two neighbouring roundabout junctions by allowing for just Lidl traffic (so no drive-thru) but 100% of it, so no allowance for any pass-by or diverted trips. In reality, this is a scenario which will never occur. The Lidl store is some 2,200m² in gross floor area and it is surrounded by a circa 7,000m² Tesco on one side and another circa 7,000m² Asda on the other. The vast majority of Lidl's traffic, particularly in the Saturday peak hours will already therefore be passing by the application site. There can be no legitimate reason to question this.

The remainder of TPS's letter attempts to throw doubt into the minds of the reader by suggesting that because the results of queue surveys at each roundabout don't match the Arcady reports for queuing levels, that therefore no reliance can be put in the capacity results obtained. We have re-run the Arcady models and checked the geometry and input flows and cannot recreate the level of queuing observed without artificially reducing capacity on certain arms to an extent which would be completely unrepresentative of the prevailing conditions. In any event, the observed queuing levels were not excessive or long-lasting, and it may just be the difference between the way in which Arcady reports queuing over a 15-minute time period and the way in which the on-site enumerators recorded queues every 5 minutes. We are confident, nevertheless, that the junction models do accurately represent the change in the level of service with and without development traffic. Such a change will be unnoticeable.

More importantly though, what TPS fail to recognise at all is that even when we have added 100% of Lidl traffic to these off-site roundabouts, the total increase in total junction inflow is little more than 5% at the Chester Road junction and 4% at the Tesco rbt. This is a level that under normal circumstances would not merit detailed capacity assessment. It certainly justifies our stance that if there are indeed any capacity problems at these junctions, the onus on mitigating them is certainly not Lidl's. If more realistic levels of additional Lidl traffic assuming the 80% pass-by/diverted proportion accepted in all previous assessment

is allowed for, then the percentage uplift in total junction inflow at off-site junctions reduces to circa 1%. This is a negligible increase which will not alter the way in which the local highway network performs at all. As experienced transportation planning consultants, TPS will no doubt accept that traffic flow conditions can vary by as much as +/- 10% on a day-to-day basis naturally.

My firm has represented Lidl since 1999 and I personally have been involved in around 250 different stores over the last twenty years. We are therefore very experienced in assessing the impact of new Lidl store developments in a variety of different areas and regularly undertake post-opening surveys at new stores which routinely demonstrate the legitimacy of the original forecasts.

The application site is on the south side of Bodhyfryd and is therefore much better connected to the town centre than either Asda or Tesco and I believe it will be a welcome addition to Wrexham. There is certainly no evidence of any detriment to the dual interests of either highway safety or the free-flow of traffic as a result of the proposals and so I would very much hope that you and your colleagues will be able to dismiss the TPS objection letter and present the application favourably to committee members.

Yours sincerely



Jim Budd
Director
On behalf of SCP

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Enc. Stage 1 Road Safety Audit
Designer's Response