

1 INTRODUCTION

1.1 Preamble

- 1.1.1 Prime Transport Planning Ltd (Prime) have been provided with comments from Phil Palmer (Highway Development Control Engineer) at Wrexham County Borough Council (WCBC) dated 29th January 2019. These comments were made in relation to the Transport Statement (TS) prepared in support of a full planning application (EP/DC/P/2018/1084) for a proposed commercial development located off Clywedog Road North on Wrexham Industrial Estate (WIE). The development has an access point onto Clywedog Road North. The parcel of land comprises B2/B8 usage of up to 25,069 sqft.
- 1.1.2 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.
- 1.1.3 WCBC's comments are provided in *red italics* below with Primes response in black standard font.

2 RESPONSE TO WCC COMMENTS

- 2.1.1 *Point 1: Any proposed access will need to provide a minimum 7.3m wide access width with 15m kerb radii. Could you please ask the applicant to provide a revised layout plan annotating this detail.*
- 2.1.2 Amended access drawing **P18042-001C**, provided within **Appendix I** of this response, details the requested geometries, additional footway/dropped kerb crossing, and junction spacing requirements. Amended Drawing **P18042-002B** provided with **Appendix I** of this response, demonstrates that a 16.5m articulated lorry can still access and egress the site via this amended access point.
- 2.1.3 *Point 2: The submitted plan indicates the provision of a 2m wide footway on the eastern side of the access extending into the site which is considered acceptable. However, I would recommend that a 2m wide footway is also provided on the western side of the access extending into the site. A suitable dropped kerb crossing point including tactile paving will be required across the access at the narrowest point of the access. This can represent the limit of adopted 'highway. I would recommend the applicant submits a revised layout plan indicating this detail*
- 2.1.4 Please refer to paragraph 2.1.2 above.
- 2.1.5 *Point 3: Any proposed access shall be staggered a minimum distance of 30m away (centreline to centreline) from any existing access on the same side of the road and a minimum of 25m away from*

any existing access on the opposite side of the road. Please annotate this detail on a revised layout Plan

2.1.6 Please refer to paragraph 2.1.2 above.

2.2 Public Transport Provision

2.2.1 It is considered that the proposed 4 no. sites would benefit from an improved bus service and additional bus stop(s) that are closer to the sites than the existing services I bus stops They have confirmed the following details in order to support local bus services for identified developments in the areas of Clywedog Road North I East I South. Section 106 funding support of £75,000 per annum for a period of 5 years, in respect of the 4identified development sites. A total funding requirement of £375,000. This would provide finance for initial installation of infrastructure (Shelters/Raised Kerbs), and annual financial support to introduce additional peak hour (morning & afternoon) bus service journeys to support the identified areas of development. The proposed development would require a total contribution of £179,899 (both northerly & southerly sites) paid over 5yrs (based on a gross floor area I pro-rata basis).I would strongly recommend that you discuss the proposed sites including identified funding for an improved bus service with our Public Transport Officer- Andrew Mytton on Tel: 01978 729760.

2.2.2 As suggested within the response from WCBC, to help with deriving appropriate improvements to public transport provision within WIE, numerous attempts over a 4 month period have been made to contact Andrew Mytton to ascertain the following:

- What improvements are considered necessary to public transport provision within WIE;
- How these improvements fit in with the overall public transport strategy for the area;
- How the costs indicated within the WCBC response were derived;
- What these contributions will pay for; and
- How contributions from other development proposals within WIE will be calculated and collected as part of an overall public transport strategy for WIE.

2.2.3 It should also be noted that whilst invited, Andrew Mytton was not in attendance at a meeting organised for the 15/04/2019 to discuss WCBC response to the various planning applications, these discussions to include the request for contributions to public transport improvements. A brief 1 page e-mail was submitted at the meeting from Andrew Mytton which again didn't really address the areas of concern regarding the public transport contributions.

2.2.4 At the time of writing this response, no significant feedback on the points raised above has been provided by WCBC. In accordance to the Welsh Office document, Circular 13/97, Annex B, such contributions 'should only be sought where they are necessary to make a proposal acceptable' and

are *‘fairly and reasonably related in scale and kind to the proposed development and reasonable in all other respects’*.

- 2.2.5 It is noted that bus service no.42 which served WIE, previously operated by Easy Coach, was withdrawn from service after 75 days of operation in September 2018. The service was withdrawn based on its commercial viability. In accordance to Circular 13/97, paragraph B12, it is stated that *‘developers should not be expected to pay for facilities which are needed solely in order to resolve existing deficiencies nor should attempts be made to extract excessive contributions to infrastructure costs from developers’*.
- 2.2.6 Circular 13/97, paragraph B12, continues to state that it could be acceptable *‘for an obligation to be sought where it would overcome an existing constraint which is materially exacerbated by the proposal’*. The development proposals for WIE are felt to not face any constraints as a result of the current existing bus service provision. The current 41a service arrives within the estate from approximately 06:00 with the last service departing the estate at circa 18:20, with an hourly frequency Monday to Saturday. Service 1e offers an additional early morning and evening service Monday to Friday. Service 41b is due to start within WIE April 2019, funded via HMP Berwyn, and is to operate an hourly Sunday frequency. Combined, all routes together provide a viable option for commuters to the industrial estate 7 days a week, with the majority of development sites proposed being within an approximate 7-minute walk of a bus stop.
- 2.2.7 Circular 13/97, paragraph B15, advises *‘to guard against attempting to secure a list or range of desirable benefits from developers, even if they consider such benefits to be related in some way to the proposed development’*. The paragraph further states that attempts to secure additional benefits may be counterproductive. This being that seeking *‘more than is justified’* may *‘frustrate worthwhile development proposals’*.
- 2.2.8 Given the above, and the recent loss of services within WIE due to a lack of patronage, it is not deemed necessary for such public transport funding to be sought. Current provision within WIE will likely accommodate the additional patronage to WIE associated with the developments.
- 2.2.9 The use of other sustainable modes of transport are also liable to increase with the appointment of a future Travel Plan Coordinator. This is supported through Planning Policy Wales 10 (PPW10) paragraph 4.1.1, with the text stating support for sustainable developments which *‘increases physical activity, improves health and helps to tackle the causes of climate change and airborne pollution’*. PPW10 emphasises the need for promotion of *‘employment opportunities in both urban and rural areas’*, particularly in areas *‘which are, or can be, easily reached by walking or cycling’*. It has been proven with Section 5 of the TS submitted in support of this application, that the site can be cycled to within a recognised reasonable distance, with approximately half of Wrexham falling within a 5000m cycling range.

- 2.2.10 Figure 8 of PPW10 is noted as listing walking and cycling above public transport within a sustainable transport hierarchy, with the recent provision of a walking/cycling route along Bridge Road South adhering to this. Paragraph 4.1.16 states that *‘Different approaches to sustainable transport will be required in different parts of Wales’*, with development needing to reflect local circumstances. It continues by stating that some areas, *‘despite it having limited public transport accessibility, could apply the transport hierarchy by: first considering how the location and design of new development could encourage walking and cycling’*. Each development site supports this statement, with cycle storage facilities provided on each site, and access to the already good provision of footways within the estate facilitated for.
- 2.2.11 In accordance to the above PPW 10 and Circular 13/97, and the lack of a clear strategy from WCBC with regard to public transport improvements with WIE we suggest that the requested contributions are unjust, unrealistic and does not accord with various Transport Policy Initiatives within Wales. They may also be illegal. The client has no other choice than to challenge the requested amounts until such a time when reasonable justification has been provided.

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 P18042-001C
	Technical Drawing P18042-002B

APPENDIX I

P18042-001C

P18042-002B

