

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 Assessment (TA) prepared in support of an outline planning application (EP/DC/P/2018/1087) for proposed commercial development located off Clywedog Road South on Wrexham Industrial Estate (WIE). The development is split over two parcels of land, each parcel having their own separate access point onto Clywedog Road South. The northern parcel of land comprises B2/B8 usage, of up to 70,000 sqft. The southern parcel of land comprising up to 27,073 sqft, of B1/B2 usage.
- 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 WCBC COMMENTS

2.1 Northern Section

- 2.1.1 *Point 1: There would appear to be an existing boundary fence fronting the adjoining site (ie/ Nu Instruments) which may impede visibility from the proposed northerly access. I would recommend that the existing fence is plotted on a revised visibility layout plan*
- 2.1.2 Amended access drawing **P18045-001C**, provided within **Appendix I** of this report, notes the above-mentioned fence. This fence is to be moved back 0.5m in order to maintain a clear visibility at 2.4m x 120m visibility splays (considered acceptable by the highways officer).
- 2.1.3 *Point 2 - The proposed access appears to be located directly opposite an existing access serving RF Bellis Haulage which is considered unacceptable. I would recommend that a revised plan is submitted indicating a more appropriate access location*
- 2.1.4 The access point for the northern parcel of Site 5 is pre-existing and therefore we would suggest is an appropriate location to utilise for access to this particular development parcel. The WCBC suggested criteria for the spacing of opposite and adjacent junctions typically relate to junctions on main roads and not private access points. The purpose of the spacing criteria is to avoid the provision of cross

- roads on the main road network and thus minimising potential vehicular conflicts, especially those relating to the movement between the two minor arms of the junction. Given the minor roads at this location are both private access points, it is suggested that movements between the development plots are likely to be minimal. There are also numerous examples within WIE where private access points are located opposite each other, a review of the accident data supplied by WCBC show that these layouts have not resulted in any significant levels of injury accidents.
- 2.1.5 Given the above we suggest that the location of the proposed access remains in the location shown on drawing **P18045-001C**. It can be seen from this drawing that the current site access location allows for the agreed visibility splays of 2.4m x 120m (DMRB@40mph) to be achieved from the proposed site access with similar levels of visibility being achievable from the existing access to RF Bellis Haulage Ltd. The geometry of Clywedog Road South also means that SSD on the main road approach to this junction is well in excess of the DMRB requirements for the prevailing 40mph speed limit.
- 2.1.6 It should also be noted that the proposed development is expected to produce 1 vehicle movement every circa 1/1.5 minutes within the AM peak, and 1 vehicle movement every circa 2 minutes within the PM peak. Applying the same trip rates to the estimated 750m GFA building that RF Bellis Haulage Ltd occupies would suggest that their site is likely to generate 1 vehicle movement every circa >10 minutes in the AM peak, with the same trip generation for the PM peak.
- 2.1.7 The above would suggest that only a minimal amount of traffic is likely to be generated by both the proposed development and the existing use by RF Bellis Haulage Ltd, the likelihood of conflicting traffic movements is therefore limited. If such conflicting movements occurred, there is ample visibility on Clywedog Road South and both side arm approaches for the drivers of vehicles to see each other. We therefore suggest that the delivery of the site access as shown on drawing **P18045-001C** would not result in a detriment to road safety in the area.
- 2.1.8 *Point 3 - I would recommend that a 2m wide footway is provided on both sides 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 that a revised plan is submitted indicating this detail*
- 2.1.9 It should be noted that 2m wide footways either side of the access road were already proposed with the original submission for Site 5 and access drawing **P18045-001B**. Access drawing **P18045-001C**, provided within **Appendix I** of this report further continues to show this provision of footway, and newly provided dropped kerb crossing.
- 2.1.10 *Point 4- The submitted plan does not appear to indicate any footway provision (2m wide) extending along the entire site frontage. If the proposed development is to be supported, I would recommend that a 2m wide footway is constructed along the entire site frontage which extends north to provide a continuous footway link with the existing footway fronting Nu Instruments*

- 2.1.11 Footway extending north to adjoin to existing provision fronting 'Nu Instruments' were previously proposed within the original submission for Site 5.
- 2.1.12 With regard to the request for the provision of a footway along the site frontage, it is suggested that given the low levels of existing pedestrian activity around WIE and the low levels of pedestrians likely to be generated by the proposed development it is felt that a short section of footway adjacent to the proposed site access with the provision of appropriate dropped crossings/tactile paving that provide access to the existing footway on the western side of Clywedog Road South is an appropriate level of provision for pedestrians.
- 2.1.13 Attention is drawn to Circular 13/97, paragraph B15, with advisories to authorities '*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*'.
- 2.1.14 Given the above, we would suggest that the provision of a footway along the eastern side of Clywedog Road South is unnecessary. The suggested provision for pedestrians for this particular parcel of land is shown on drawing **P18045-001C**, provided within **Appendix I** of this report

2.2 Southern Section

- 2.2.1 *Point 5 - The proposed access appears to be 14 wide with limited kerb radii. There would appear to be a turning facility located directly behind the access to allow 16.5m HGVs to turn. This arrangement is considered unacceptable and has the potential for conflict of vehicle movements entering/exiting the site. I would recommend that the applicant considers re-locating the access further to the north east where the site has potentially more depth to accommodate a more suitable access*
- 2.2.2 Amended access drawing **P18045-002C**, provided within **Appendix I** of this response, details the reduced access carriageway width to the site. The access can be seen to be 7.5m in width with 15m radii. Drawing **P18045-004C** contained within **Appendix I** demonstrates that a 16.5m articulated lorry can still access and egress the site via this amended access point. The turning facility located directly behind the access has been removed in line with WCBC comments, vehicles turning within the site can still be accommodated within the turning circle shown toward the northern part of this site.
- 2.2.3 It is noted that moving the site access has been suggested, which in the opinion of the highways officer, could create a more preferable access. An alternative access could effectively split the site into two separate halves, which could severely impact the footprint of the proposed units. These restrictions on the site could therefore render the scheme undeliverable.

- 2.2.4 *Point 6 -The submitted plan does not appear to indicate any footway provision (2m wide) extending along the entire site frontage. If the proposed development is to be supported, I would recommend that a 2m wide footway is constructed along the entire site frontage which extends north to provide a continuous footway link with the existing footway fronting Nu Instruments*
- 2.2.5 See paragraph 2.1.10 – 2.1.14 above.
- 2.2.6 *Point 7 – I would recommend that a 2m wide footway is provided on both sides 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.*
- 2.2.7 It should be noted that 2m wide footways were already proposed either side of the carriageway along with the original submission for Site 5 and drawing **P18045-002B**. Amended access drawing **P18045-002C** provided within **Appendix I** of this report further continues to show this provision of footway, and newly provided dropped kerb crossing.
- 2.2.8 *Point 8 - Based on B1/ B2 Use, the proposed development would require a maximum of 84 spaces or a maximum of 65 spaces. The submitted layout plan indicates the provision of 48 spaces from the southerly site. I would recommend that the applicant provides further information in respect of the specific gross floor areas proposed for each Class Use ie/ either B1 or B2 or a combination of the two class uses. This will allow a more accurate assessment of the required parking provision*
- 2.2.9 Given that the application for the southern section of site 5 is outline only, specific floor areas for a B1/B2 class split has not been provided. In order to meet WCBC parking standards, the parking provision within the site has been reviewed and unit 2B reduced to 1049sqm, this has allowed for additional spaces to be provided. This review has brought the total to 76 car parking spaces, which is in line with the WCBC higher parking standard required for B1 use class, at only a 4% shortfall. Meeting this higher standard should reduce the risk of on street parking to an acceptable standard.

2.3 Public Transport Provision

- 2.3.1 *Point 9 - 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.

- 2.3.2 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.
- 2.3.3 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.
- 2.3.4 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'*.
- 2.3.5 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'*.
- 2.3.6 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.
- 2.3.7 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’*.
- 2.3.8 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.
- 2.3.9 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.
- 2.3.10 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.
- 2.3.11 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

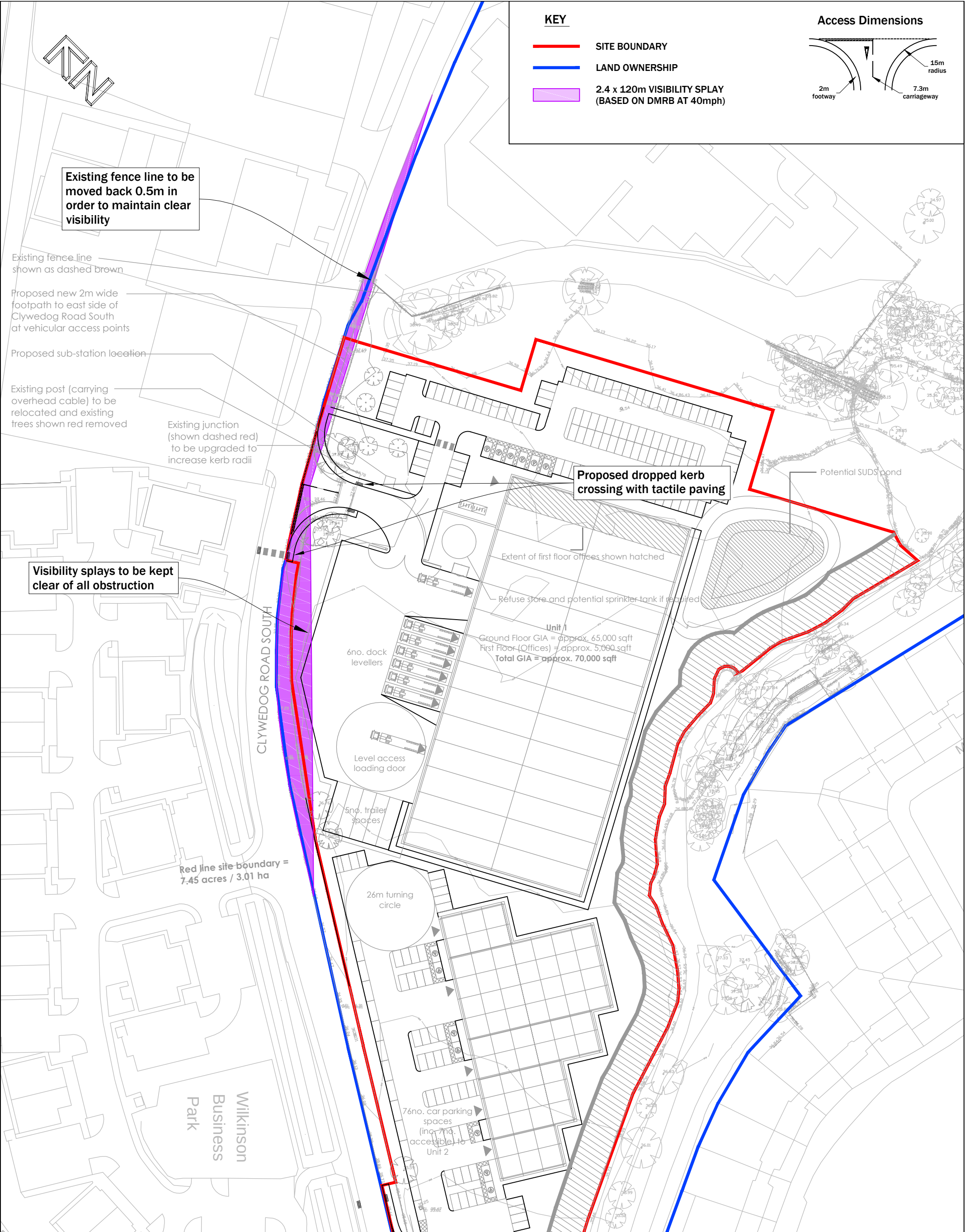
- 3.1.1 This response provides the additional information that WCBC have requested. Prime trust that this response clarifies their position on each of the points raised by WCBC and will allow the scheme to be approved on Highways matters.

APPENDICES

Appendix I	Technical Drawing P18045-001C
	Technical Drawing P18045-002C
	Technical Drawing P18045-004C

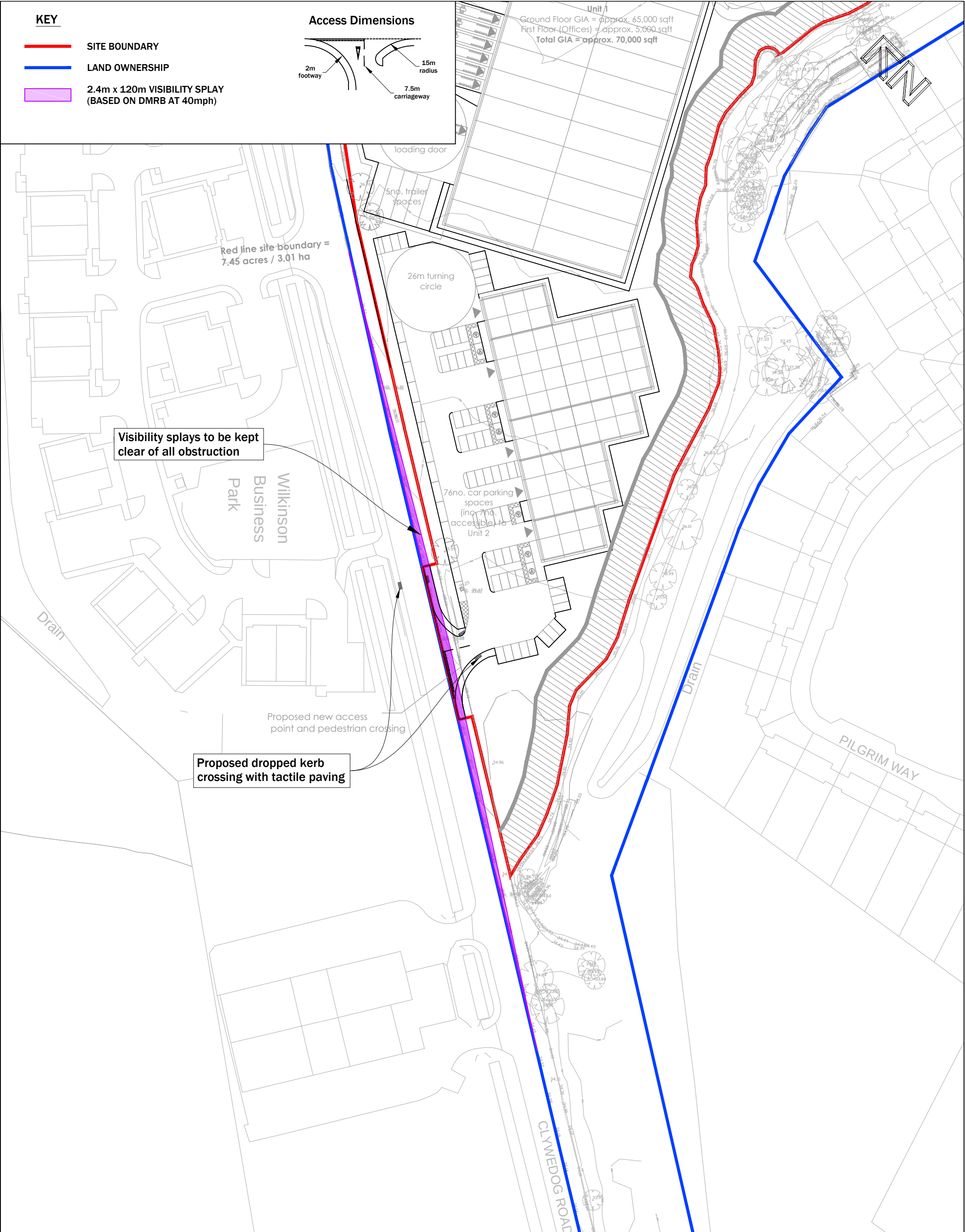
APPENDIX I

P18045-001C



 9 Hurricane Court Liverpool International Business Park Estuary Boulevard Liverpool L24 8RL www.primetp.co.uk 0151 728 1860	C	08.04.19	AM	UPDATED TO NEW SITE LAYOUT	Project	WREXHAM INDUSTRIAL ESTATE - SITE 5	Drawn by	Issue date
	B	21.11.18	VB	UPDATED TO SITE LAYOUT P4			AM	08 APR 2019
	A	06.11.18	VB	UPDATED WITH HIGHWAY BOUNDARY			Scale(s)	
	Rev	Date	By	Revision notes			1:1000 @ A3	
	Status				Title	Drawing No		
FINAL				NORTHERN PARCEL PROPOSED ACCESS STRATEGY	P18045-001C			

P18045-002C

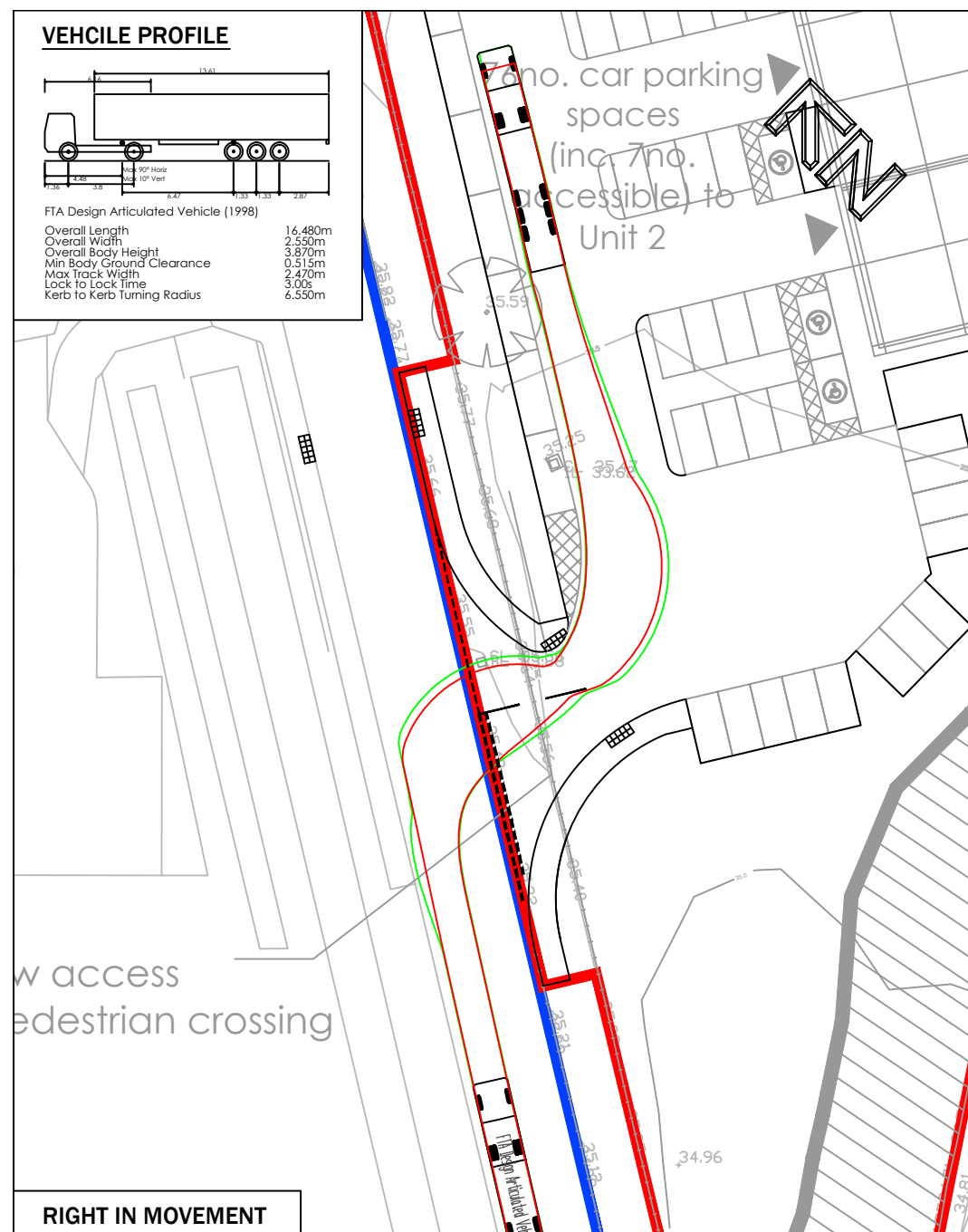
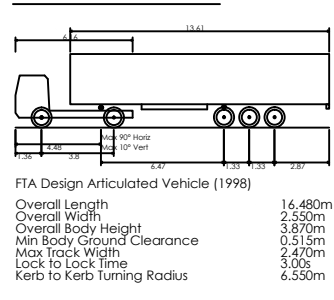


 9 Hurricane Court Liverpool International Business Park Estuary Boulevard Liverpool L24 8RL www.primetp.co.uk 0151 728 1860	C	09.04.19	AM	UPDATED TO NEW SITE LAYOUT	Project	WREXHAM INDUSTRIAL ESTATE - SITE 5	Drawn by	Issue date
	B	21.11.18	VB	UPDATED TO SITE LAYOUT P4			AM	09 APR 2019
	A	06.11.18	VB	UPDATED WITH HIGHWAY BOUNDARY			Scale(s)	
	Rev	Date	By	Revision notes			1:1000 @ A3	
	Status				Title	Drawing No		
FINAL				SOUTHERN PARCEL PROPOSED ACCESS STRATEGY	P18045-002C			

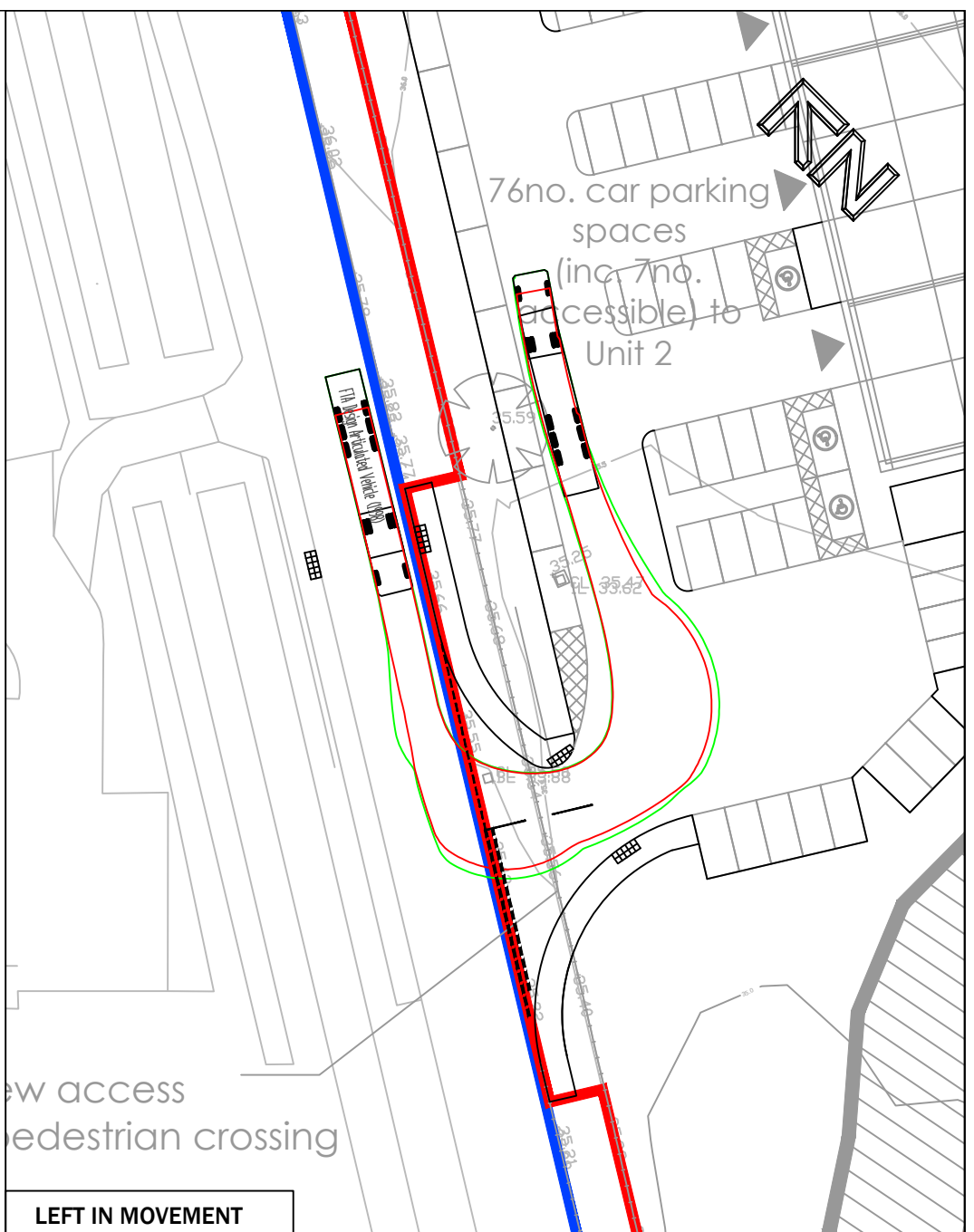
P18045-004C

The drawing shows a side profile and a top-down view of an articulated vehicle. The side profile includes a front cab and a long trailer section. The top-down view shows the wheel layout: a single front wheel, a steering knuckle with a 90° hole and 10° twist, and three axles with dual wheels. Dimensions are provided in millimeters for various components and overall measurements.

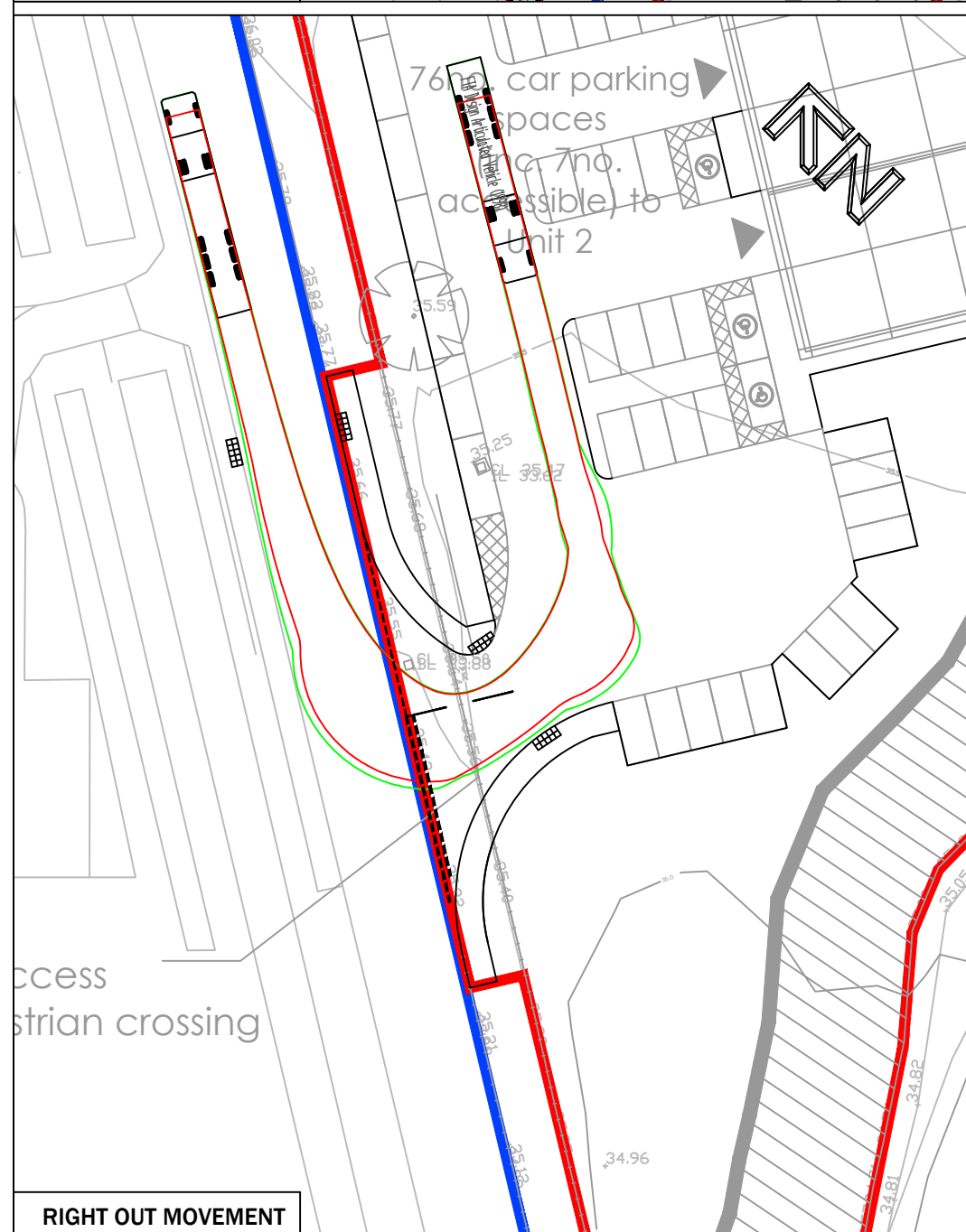
Overall Length	16,480mm
Overall Width	2,550mm
Overall Body Height	3,870mm
Min Body Ground Clearance	0,515mm
Max Track Width	2,470mm
Lock to Lock time	3,0/s
Kerb to Kerb Turning Radius	6,550mm



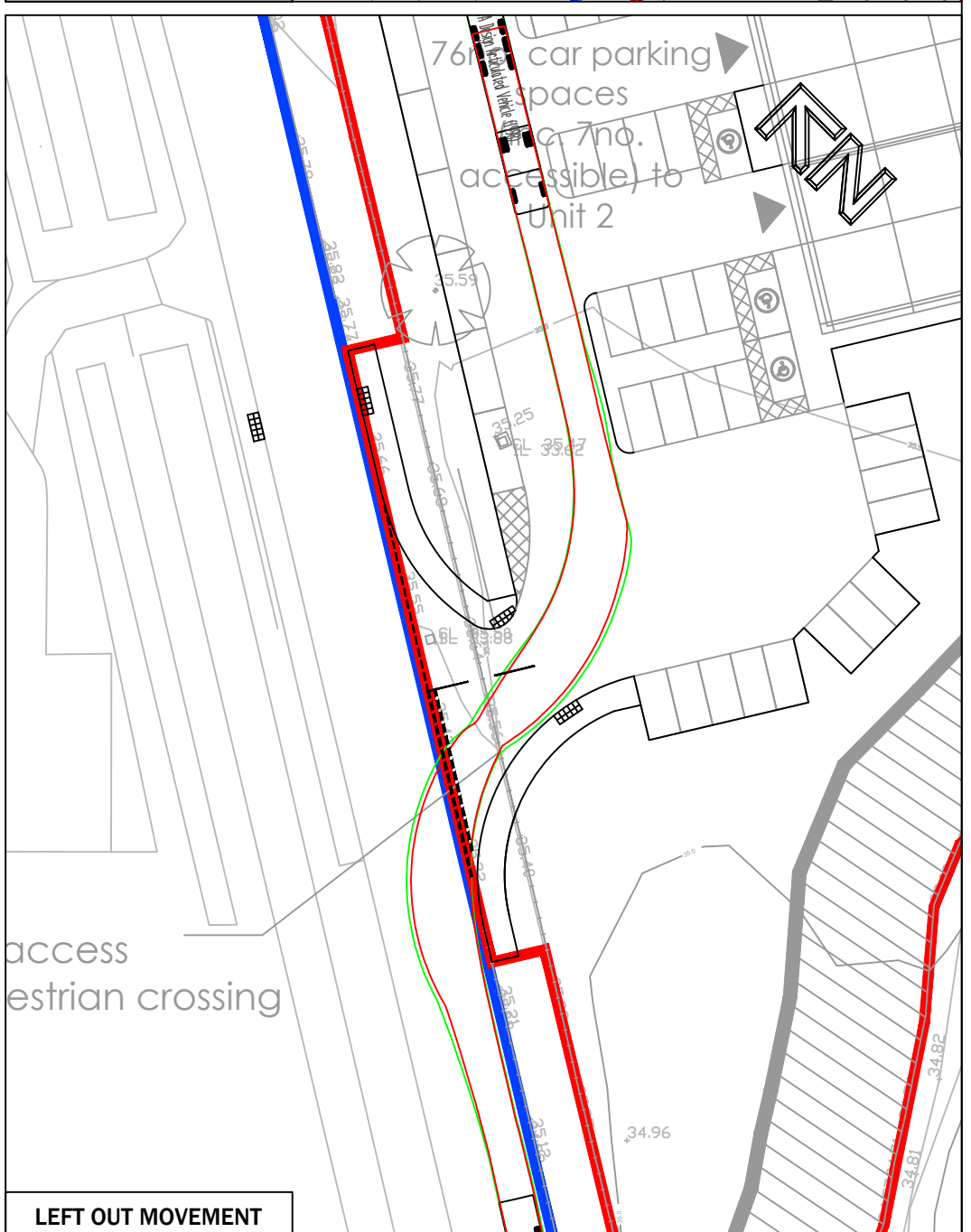
RIGHT IN MOVEMENT



LEFT IN MOVEMENT



RIGHT OUT MOVEMENT



LEFT OUT MOVEMENT



9 Hurricane Court
Liverpool International Business Park | Estuary Boulevard | Liverpool | L24 8RL
www.primetp.co.uk | 0151 728 1860

C	09.04.19	AM	UPDATED TO NEW SITE LAYOUT
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Rev	Date	By	Revision notes
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	Status
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FOR INFORMATION

	Project	

WREXHAM INDUSTRIAL ESTATE - SITE 5

	Title
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SOUTHERN PARCEL ACCESS - SWEPT PATH ANALYSIS

Drawn by
AM

Issue date
09 APR 2019

Scale(s)

1:500 @ A3

Drawing No	
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P18045-004C