

MEMORANDUM

From: Planning Control Manager **To:** Head of Environment and Planning
Our Ref: EP/DC/P/2018/1086 **Your Ref:** PF/P/2018/1086
Date: 20th May 2019

TOWN AND COUNTRY PLANNING ACT 1990

TOWN AND COUNTRY (GENERAL DEVELOPMENT PROCEDURE) ORDER 1995

Location: O. S Grid Ref: 373 498 Storage Land at Clywedog Road North, Wrexham Industrial Estate, Wrexham.

Development: Erection of B1 Light Industrial Units with associated means of access, servicing, parking and landscaping treatment with ecological mitigation zone (Site 4).

I refer to your consultation dated 09/05/2019 including revised Technical Note from Prime Transport in respect of the above.

Access

The proposed development site is located on Clywedog Road North which is an unclassified road subject to a 40mph. Although vehicles may well be travelling at 40mph approaching from the north east. I would estimate typical vehicle speeds at being around 30mph for vehicles approaching from the south west.

Based on these speeds, any proposed / existing accesses in this location would normally be required to provide visibility splays of 2.4 x 120m in the north easterly direction and 2.4 x 56m in the south westerly direction measured to the nearside edge of the adjoining highway in accordance with TAN 18/ Manual for Streets.

Submitted layout plan (Drg.No. P18044-001 C) indicates visibility splays of 4.5 m x 120m in the north easterly direction and 4.5 x 65m in the south westerly direction measured to the nearside edge of the adjoining highway from the proposed access. A setback distance of 2.4 would be considered acceptable in this instance. It would appear possible to provide the required splays from the proposed access point.

The proposed access would appear to be intended for HGVs. The proposed 7.5m wide access would be considered unsuitable to serve the proposed development site serving the largest HGVs,.

Swept Path Plans (Drg. Nos. P18044-002C)

The submitted plans indicate a 16.5m long HGV entering and exiting the site which requires the vehicles having to cut across the proposed access occupying the majority of the available access width. Such swept paths are a result of not providing the required standard layout for an industrial access and are considered unacceptable. Such a layout is likely to increase the risk of vehicle conflict at the access and have the potential to result in collisions on the adjoining highway.

Proposed Unit 1 would appear intended for large HGVs which are likely to maneuver / turn within the main site access which is considered unacceptable. 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.

The siting of an internal pedestrian crossing point just inside the site access is considered inappropriate and has the potential to result in large vehicles having to stop whilst entering the site.

The submitted Technical Note suggests that the required splays could not be provided from a more centrally located access. I would recommend that the applicant carries out a speed survey in order to determine 85th percentile speeds along this section of Clywedog Road North. This may well determine speeds lower than 40mph for which reduced sightlines could be used ie/ Manual for Streets.

Proposed Site Plan Drg. No. B10222-AEW-SI-XX-DR-A-0503 Rev P7

I would normally recommend that any proposed access of this nature will need to provide a minimum 7.3m wide access width with 15m kerb radii.

The access will need to be paved with hard bound materials for a minimum distance of 20m behind the adjoining highway with no gates being erected within 20m of the highway boundary.

The proposed access appears to be 7.5m wide with limited kerb radii. 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. The applicant would need to demonstrate that such an access can achieve adequate lateral and forward visibility splays and submit revised swept path details. Alternatively, the site could be limited to industrial / business units that are serviced by smaller rigid HGVs that require smaller turning areas. This could be controlled by a suitable Service & Delivery Management Plan.

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 which extends around the junction onto Clywedog Rd East along the site frontage and extends beyond the north eastern site frontage to the existing 1.9m wide footway to provide a continuous footway link on this side of Clywedog Road North.

The applicant does not appear willing to carry out the above footway works. However, it is considered appropriate to request these footway improvements not only to serve the development site itself but for the wider benefit of those visiting / working on the industrial estate and to support the approach for more sustainable means of accessibility.

Standard highway design requirements across the country recommend footway provision for industrial estates on both sides of the carriageway.

The applicant will be required to enter into a s.38 / 278 agreement with the Council to carry out any access / footway works.

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.

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.

I would recommend that a revised plan is submitted indicating a more appropriate access location with 15m kerb radii for the full extent of the radius.

No private surface water run off shall be permitted to flow onto the adjoining highway. An Aco drain or similar shall be provided across the access to intercept such run-off.

Details of the how the remaining section of new highway forming the access / bellmouth will be drained will need to be provided ie/ additional gullies.

Parking & Turning Provision

The submitted layout plan (Drg. No. B10137-AEW-SI-XX-DR-A-0503 Rev P7) indicates that the proposed development comprises 11 no. units – LPGN 16 B1 Use (3263m² gfa).

I understand that the applicant is seeking a flexible B1 light industrial consent.

LPGN 16 requirements for the proposed uses are as follows:-

Class Use	Requirement	Potential GFA m²	Max Spaces Required	Proposed Spaces
B1	1 space per 30 m ² gfa	3263	109	-
B2	1 space per 50 m ² gfa	3263	65	-
			Range 65 - 109	72 Total

Based on B1 Use, the proposed development would require a maximum of 109 spaces or a maximum of 65 spaces for B2 Use. The revised layout plan (Drg. No. B10137-AEW-SI-XX-DR-A-0503 Rev P7) indicates that 108 parking spaces are to be provided at the site. Based on B1 Use, this would represent a 1% shortfall in parking provision compared with maximum standards. The proposed level of parking provision would be considered adequate.

A number of the proposed parking spaces would appear to have insufficient space behind for maneuverability ie/ less than 6m clearance when HGVs are parked which is poor. **It is not clear how this issue will be addressed.**

Public Transport Provision

There is no existing bus service in close proximity to the site. I'm sure the developer would agree that it would be beneficial to introduce a bus service in order to promote opportunity for a modal shift for both the existing and proposed workforces. It is surprising that the planning officer does not wish to support such a modal shift considering the Welsh Governments planning advice on active travel and sustainability. He states that there is no strategy in place for such matters on the industrial estate but fails to recognise that the Council received a significant S106 payment in the last 12months to fund additional bus services to the local prison.

That said, I acknowledge that each of these sites could come forward in isolation and it may be considered unjustifiable to expect each site to fund a sizeable payment towards the future provision of a bus service. If the planning inspectorate support the LDP proposals for additional industrial land on Bryn Lane then I would anticipate that this will provide contributions towards an improved bus service for the whole of the industrial estate by way of a CIL or similar.

It may therefore be more reasonable to consider requesting a S106 payment in lieu of future bus stop / raised kerbs / signs / hardstanding provision at this site. The money set aside could be refunded if it has not been spent within 7 years of the development being completed. On the basis of previous costings for such provision a figure of £8900 is proposed.

I would not be able to support this application in its current format.

I await the requested information.

Notes to Applicant

- *The proposed access / footway should be constructed to a standard suitable for adoption by the Council for future maintenance at the public expense and the developer will need to enter into an agreement with the Council under s.38 / 278 of the Highways Act 1980.*

You are advised that the Highway Authority will require such works to be completed to their satisfaction before they will formally adopt the relevant Highway works for public use and to be maintained at public expense. This will include the provision of a bond to cover the estimated value of such works.

The appropriate fees will become due to the Council when the Highways Authority approve the proposed works to be carried out.

Supplementary Notes

The applicant's attention should be drawn to item nos. 1, 2, 3, 4 & 5 of the supplementary notes.

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