# MEMORANDUM

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| **From:** | Chief Officer, Environment & Technical | **To:** | Chief Officer Economy & Planning |
| | | **FAO::** | Philip Mullineux |
| **Our Ref:** | P-2025-0427 | **Your Ref:** | P/2024/0427 |
| **Date:** | 11/08/2025 | | |

**TOWN AND COUNTRY PLANNING ACT 1990**

**PROPOSAL: CAIS AMLINELLOL AR GYFER CODI HYD AT 900 O ANHEDDAU (MAE YMDDANGOSIAD, TIRLUNIO, CYNLLUN A GRADDFA YN FATERION A GEDWIR YN ÔL) / OUTLINE APPLICATION FOR ERECTION OF UP TO 900 DWELLINGS (APPEARANCE, LANDSCAPING, LAYOUT AND SCALE RESERVED)**

**LAND AT ERLAS PARK, CEFN ROAD, WREXHAM, LL13 9TT**

With reference to your consultation in respect of the above. Local Highway Authority (LHA) has reviewed the following information when considering the impact of this application from a highway perspective.

It is understood that this is an Outline Planning Application for residential development for the construction of up to 900 residential dwellings with associated infrastructure (playing fields, open space and SUDs attenuation) with all matters reserved except for detailed means of primary highway access".

The proposed development is part of the wider site allocation known as Key Strategic Site 2 (KSS2) within the adopted Wrexham Local Development Plan (LDP) 2013 – 2028. The whole of the site allocation within the LDP is intended to deliver a total of up to 1,680 new dwellings across the entire site.

This application relates to the southern portion of the KSS2 allocation and is referred to as 'KSS2 South'. There is a significant and complex history with regards to the LDP process and the allocation of this site for residential development. The principle of development has been agreed and accepted as part of the LDP process. This included a comprehensive transport assessment and transport modelling exercise, which examined the transport implications of this and the other key allocation sites in Wrexham. This process concluded in the agreement of a Statement of Common Ground (SoCG) between the Council and the key KSS2 stakeholders, to inform the Local Plan Examination in Public (EiP). The SoCG set out the agreed position of the Council and the Developers in relation to highway matters confirming that agreement had been reached regarding the highways impacts and infrastructure requirements necessary to enable the development of this and other strategic site allocations.

**Transport Assessment**

A detailed Transport Assessment (TA) has been submitted with this application. The LHA has reviewed this document and the significant amounts of appended information and have the following comments (using the respective section headings of the TA):

**Transport Assessment Scoping –** It is noted that this TA builds on the TA submitted for a previous application for this site (March 2024). Whilst formal scoping discussions were undertaken to inform the previous application, no scoping discussions have been held for this most recent application or TA. It appears that this TA in part responds to comments made by the LHA on the previous application. Whilst this current application appears similar to the previous, each application should be treated separately and not rely on information provided as part of earlier applications. A number of the comments made in following sections could have been addressed should a scoping exercise have taken place for this application.

**Local Facilities and Active Travel Catchments –** As noted earlier the principle of development for this site has been agreed with the LDP allocation. The LHA agree that the site is located within suitable distance to and has access to the necessary facilities to offer the choice of mode of travel to these facilities. The TA sets out walking distances and cycling distances to local destinations. Whilst these distances are not disputed, it is noted that these must be regarded as estimates, given no detail is proposed of on-site routes, permeability or connectivity. It is noted that the isochrones provided suggest entirely open site boundaries where walking/cycling movements can leave the site at any point. In reality the position of boundaries, street layouts position of houses etc and critically the access points into/out of the site, means that the achievable catchments will not be as shown on the plans in the TA.

**On-site Primary School –** The TA in this section makes reference to KSS2 delivering a 420-place primary school, suggesting that this would further enhance the sustainability of the site. Whilst this principle is not disputed, it is noted that this application does not make reference to the school, nor does the TA make any reference to trip generation/distribution or assessment of school trips, nor is any detail provided on where this school may be located. The location of the school will be critical as if located near a boundary it could attract trips from outside the site, which do not appear to have been allowed for in the assessment (nor has any reference been made to possible trip internalisation). **It is requested that clarification be provided on whether trip rates / distribution assumptions have been adjusted due to the assumed on-site school.**

**Local Highway Network** – The TA states that Cefn Road is subject to a 20mph speed limit. It is noted that Cefn Road is proposed to be reverted to 30mph speed limit - as referenced in the 2024 response from the LHA. Therefore all assessments, including but not limited to visibility requirements, that include the speed limit on Cefn Road should be in accordance with this proposed speed limit – not 20mph.

**Surveyed Traffic Flows –** The background to the traffic data involved in the LDP VISSIM based assessments and subsequent traffic survey (2023) is understood. However, it is not clear why, with all the points made about the more recent traffic data, the TA presents turning movements from the original 2017/18 data. **For the avoidance of doubt it is requested that the TA include the 2023 turning movements.** Whilst significant detail has been exchanged previously regarding the comparability of the 2017 to 2023 data, no analysis appears to have been undertaken at the turning movement level (only at junction or arm level). This turning movement level analysis is the final element needed in this regard. As noted previously, **the LHA have concerns over the assertion of no traffic growth based on this 2023 re-survey and require this further analysis**. It is noted also that the percentage reductions identified in Table 2.3 of the TA fall within what could be considered daily variation. It appears that throughout the TA and appendices, references to the 2023 traffic surveys do not identify exactly when the surveys took place, or if this was only a single day or over multiple days. It is also noted that Appendix B of the TA contains a brief note comparing the 2017 and 2023 data. This note in turn refers to an Appendix C containing flow outputs, but this Appendix is not provided. **The LHA therefore require these Appendices to be provided and for details and when the 2023 traffic survey(s) took place to be provided.**

**Collision Data –** The TA presents a summary of collision data taken from the Crashmap website for the period 2018 to 2022. It is unclear why this has been done rather than using the most recent five-year period (2019 to 2023). **The applicant should include an analysis of the 2023 data which is available on the Crashmap website.**

**Principles of the Access Strategy** - The TA refers to the proposed access strategy and states that consideration has been given to the "*permeability of the site and the connections to the surrounding area, for all modes of transport*" and to "*internal access arrangements*". It is noted that as this is an outline planning application this detail has not been included in the TA, nor has any detail been provided on the Access Strategy.

The TA in this section states that the main spine road through the site has been designed to potentially provide a future transport link to the wider KSS2 site. In a later section (4.42) the TA refers to this spine road as having "*a segregated shared footway / cycleway along at least one side*". This is confusing, as provision should either be shared or preferably segregated – it cannot be both. It is also noted that it will be a requirement that footway and cycle track provision should be on both sides of the spine road – the spine road runs through the site and should enable active trips rather than be a barrier to it. **Given this is a critical piece of infrastructure, the LHA requires details of the assumed cross-section for this spine road to be provided for approval as part of this application. For the avoidance of doubt this must illustrate vehicular provision and active travel provision, with the expectation for walking and cycling facilities to both sides.**

**Proposed Development -** The TA also references the masterplan phasing plan allowing for buses to loop through the site. The TA states this 'strategy' has been discussed with the Council's Public Transport team however it appears details have not been agreed. To provide a suitable carriageway width to accommodate bus movements, it is required that the spine road and all routes that buses would be expected to use be provided to a minimum 6.75m width.

**Proposed Vehicular Site Access Strategy –** Please refer to Site Access proposals below.

**Public Transport Strategy –** The final paragraph (4.51) of this section states that "*further discussions will take place as part of this planning application, including with Arriva, as the proposed development progresses*". It would be expected that sufficient details to enable the LHA to consider the application would be provided as part of the application, not as a post application matter. Given the strategic nature of the site, this application must present suitable public transport proposals to serve the development and offer a service proposal that is attractive enough to encourage and facilitate non-car trip making from the outset of the development – so as to affect trip making behaviour at the start of the development occupation. **The LHA therefore requires further details of the bus strategy to serve the site, including service routings, frequencies, facilities and infrastructure proposals.**

Further to the above if the loop proposals is acceptable to the Council, **details of this route both in terms of physical location and carriageway cross section must be provided.**

**Construction** – Given the site's proximity to a number of sensitive receptors, including a nursing home and a school, a Construction Traffic Management Plan will be required by planning condition. For the avoidance of doubt this must include construction vehicle routings, restrictions on construction vehicle movements during school start and end times, how contractor staff parking will be managed and a comprehensive dust/mud management plan to prevent debris being transported onto the highway.

**Non-Vehicle Trip Generation –** Non-Car Trip generation is detailed section 5.18. As noted earlier further details of bus movements and operational proposals are required before the bus strategy can be agreed. **Until and unless this is done the assumptions used to determine likely volume of bus trips also cannot agreed.** The use of a proxy figure to determine possible bus-based trips requires an understanding of supporting measures.

Section 5.20 states there is "*considered to be excellent scope to achieve higher non-car modal share for many journeys…"* but no detail is provided to substantiate this.

Section 5.22 refers to non-car trips to the proposed primary school have not been calculated separately. A number of sections of the TA talk about internalisation of trips in relation to the school and other trip ends / attractions. An on-site school has the potential to increase non-car trips, but depending on location it also has the ability to generate car-based trips. **For the avoidance of doubt the LHA request confirmation of what assumptions, if any, are included on trip internalisation.**

Section 5.22 also references the sports pitches and trips to this facility. It is understood that the current application does not include any such facility, so it is unclear why reference is made to this.

**Vehicle Trip Generation and Distribution** – Section 6.1 implies that vehicle trip rates were agreed with the LHA, this is not considered accurate. It was and remains the view of the LHA that the trip rates used in the plan making assessments were not accurate. In particular, it is not considered appropriate to apply lower trip rates to affordable housing. If the applicant can provide evidence to demonstrate that modern affordable housing on a comparable site to KSS2, exhibits lower trip making levels than general private housing, this position may be revisited. It is also noted that, notwithstanding the above, the number of sites from the TRICS database that are used to derive the affordable home trip rate are very limited and as discussed below are not all valid, which further weakens this approach.

Section 6.7 states that trip rate position was previously agreed. As is clear in the LHA response included in Appendix L of the TA, this was not the case with the previous application on this site.

The TA includes vehicle trip rates as derived from the TRICS database. From reviewing the supporting information presented in Appendix F of the TA, the LHA make the following comments:

- The TRICS site selection includes a number of site surveys which date back to 2012 and are therefore considered out of date. 2015 is suggested as a threshold in this regard.
- The site selection for Private Housing includes a number of sites which include apartments and flats. Flats typically exhibit lower trip rates than houses and to avoid any doubt, these should be removed.
- Similarly, sites used for the Private Housing trip rate derivation are included which are bungalows, which also typically have lower trip rates than houses. These should be removed.
- The Private Housing site selection includes a site with a local centre. That is not relevant to the proposed site and should be removed.
- The Private Housing selection includes sites which have significantly different population profiles. 4-days of surveys are included for sites which have a population within 5-miles of greater than 100,000, which is not considered relevant to KSS2.
- The affordable housing site selection includes a site which is on the edge of the town centre (Kings Lynn) and therefore not comparable.
- The affordable Housing selection includes sites which have significantly different population profiles. 1 of the 4 days of surveys are included for sites which has a population within 5-miles of greater than 100,000, which is not considered relevant to KSS2.

**The LHA requires the trip generation for vehicles to be revisited to take account of the above. A comparison table of the resulting trip rates and total generation compared to that presented in the TA is requested, to identify if addressing the above points has a material impact.**

To be clear it is not the intention of the LHA to achieve higher trip rates, rather it is the intention to have appropriate and realistic trip rates that result in an accurate level of trip generation, to ensure that the likely implications of the scheme are fully understood.

**Trip Distribution** – The TA has used travel to work data from the 2011 census. The site is located on the boundary of two census output areas and to determine the distribution, an average of the two output areas has been used. This would normally be an over-simplification, but given the characteristics of this part of Wrexham and the dominance of travel to work to the town centre and / or the Industrial estate, this average approach is considered reasonable.

For the avoidance doubt however, **it is requested that a comparison of trip distribution using the 2021 census data be undertaken**. The LHA Is aware of the limitations and issues with the 2021 data, but it is inevitable that interested parties will query the use of 2011 data.

**Offsite Highway Improvements** - Figure 7.1 of the TA presents the proposed modifications to the Greyhound Roundabout. This involves modest modifications to the Stryt Holt (northwest) approach and to the Cefn Road approach.

On the Stryt Holt approach a flare lane is proposed via widening into the footway. No scale bar is provided on drawing (VN232881) so **it is requested that the resulting footway widths on the affected corners be provided on the drawing**. It *appears* that the footway width is being reduced below current levels, which would not be welcomed, hence the need for this detail to be shown. Lighting columns and a comms cabinet would be affected by this change in kerb lines and will therefore need to be relocated at the applicant's expense.

Widening the entry width on Stryt Holt makes this a significantly more difficult crossing for pedestrians. It is noted no consideration is given to pedestrian crossing provision at this key local junction that will likely be key location for pedestrian movements to/from the site. Without improvements to crossing provision at this location, especially with the proposed modifications, the junction could become a barrier to pedestrian permeability.

On the Cefn Road approach, it is required that the highway adoption boundary be overlaid on to the drawing and the residual footway width be demonstrated. It is noted that the back of footway on this corner is not always consistent with the highway boundary and the ability to achieve this modification within the highway boundary must be demonstrated – or agreement of with land owner proven. On this approach also the widening results in a wider crossing for pedestrians and no consideration of pedestrian improvements appears to have been considered.

It is noted that a separate drawing shows how the WCBC Active Travel teams proposals could be incorporated. The LHA and the Council's Active Travel team consider that given the proximity of this junction to the site, the existing lack of pedestrian provision and the possible impact on pedestrian amenity and safety, that the applicant should fund improved pedestrian crossing provision at this location. **A condition will therefore be added requiring the applicant to submit a pedestrian crossing improvement scheme for approval by the LHA.**

For the approaches proposed to be modified at the Greyhound Junction **it is required and expected that swept-path assessments be provided to demonstrate that proposals do not affect the ability for large vehicles to safely and efficiently negotiate the junction.**

**A483 Junction 6 –** The TA notes in section 7.90 that the Welsh Government (WG) were provided with assessment data in 2024 and that as no further comments were received from WG this demonstrates WG satisfaction with the scheme. This may not necessarily be the case and the LHA would suggest that for the avoidance of doubt, formal confirmation be obtained of the WG position.

## Site Access Proposals

Cefn Road Northern Access – A priority-controlled junction is proposed with the site access as the minor arm. The access road carriageway width of 5.5m is acceptable, subject to bus routing requirements. 2m footways are proposed to both sides of the access and to the south along Cefn Road (east side). However the footway from the site access to the north is shown as terminated to the immediate north of the junction. **Clarification is required in this regard as this footway stopping with no onward provision or crossing provision is not acceptable.**

The access plan shows what appears to be an acceptable 2.4m by 43m visibility splay from this junction. However, for the avoidance of doubt **it is requested that the position of the mature trees and the hedgerow be shown on the drawing to provide clarity that the visibility will not be obstructed by trees.** It is noted that to the north and south of the proposed access are a number of significant mature trees (to the south a tree is located on what appears to be the radius of

the proposed junction). It is also noted that the site access junction appears to conflict with highway signage and that this must be replaced to a suitable location without impacting on visibility splays. To the immediate north of Sutton Drive, a lighting column will need to be relocated on the east side to facilitate the footway widening. The LHAs lighting team should be contacted in this regard.

It appears the footway to the south along Cefn Road (east side) is to be widened. Several references are made in the TA to the desire to retain hedgerows/trees, therefore **clarification is required as to how this widening is to be achieved and whether this will be into privately owned land, which would therefore need to be adopted going forward.**

The access junction is proposed immediately offset to the access into the nursing home on the west side of Cefn Road. **The LHA is concerned about the safety and suitability of this given the potential conflict between right turning vehicles into the site with right turning vehicles into the nursing home. The safety of this will need to be confirmed via a Road Safety Audit.**

A new signal-controlled crossing is proposed to the south of the access junction. Whilst this is a positive addition, the interface with the immediately adjacent nursing home will need to be considered. The LHA would recommend the installation of rotating cone devices rather than audibles to ensure noise from the operation of the crossing is kept to a minimum for local residents.

The junction access drawings show the northern and southern access junctions and the proposals to amend the footways at those locations, but they do not show what is proposed along the remainder of the eastern side of Cefn Road between the northern and southern junctions. **A plan showing the full extent of footway proposals is therefore required.**

Swept-path assessments have not provided for this junction**. Swept-path assessments based on the standard WCBC Refuse Collection Vehicle (RCV) must be provided.**

Cefn Road Southern Primary Access – The southern (primary) access is proposed to be a three-arm signal-controlled junction, with signal-controlled pedestrian/cycle crossings over each arm.

The site access arm is shown as having a kink / slight dog-leg in its alignment on approach to Cefn Road. **The LHA requires confirmation of why this is present?**

Toucan crossings are provided over each of the three arms which is a welcome proposal. However **as the site access arm of this junction will form what will be the main spine road, it is expected that a greater level of Active Travel provision be delivered than shared cycle/footways.**

Drawing VN232881-D101 shows the general concept of the signal-controlled layout. It is noted that the signal staging arrangement that has been modelled in the junction assessment **is not compatible with the layout and in particular, the signal head configuration shown on this drawing**. Please refer to later comments on the LinSig modelling of this junction.

On the west side of Cefn Road, the Toucan crossings tie into what is currently a grass verge, with new shared cycle/footways proposed to tie into the adjacent service road. There is a noticeable level difference between the top of the grass verge and carriageway level of the service road. This shared footway would therefore either need a retaining structure at the rear of the parking layby with safety railings, or it would need to be re-thought out. At the back of the parking layby, if a retaining wall were introduced, it would not be possible for car doors to be opened. It is also noted that the gradient involved to go from carriageway to what is grass verge back to carriageway would need to meet current Active Travel and inclusive mobility standards. A number of lighting columns and a telegraph pole would need to be repositioned (at the applicant's expense). **The LHA therefore requires greater detail on this element of the access junction proposals.**

No detail is show as to how cyclist will join the service road to the west side, to the south of the access junction (on the east side), or to the north of the shared provision (on the east side) once the shared footway ends. Details such as this must be in keeping with and meet the requirements of the Welsh Government's Active Travel Act Guidance. **The LHA requires these details to be provided.**

The signal-controlled access junction appears to have guard railing along several sections of footway, including the shared footway/cycleway sections (which it is noted will reduce the effective width), but not proposed in other positions. **The LHA request clarification on why guard railing is proposed.**

As at the northern access, it appears the footway to the south along Cefn Road (east side) is to be widened. Several references are made in the TA to the desire to retain hedgerows/trees, therefore **clarification is required as to how this widened is to be achieved and whether this will be into privately owned land, which would therefore need to adopted going forward.**

Swept-path analysis has been provided for this junction to illustrate a single deck bus turning into and out of the access. To make this drawing less confusing **the LHA request separate swept-paths for the turns in and turns out of the access. Swept-path assessments based on the standard WCBC Refuse Collection Vehicle (RCV) will also be required.**

Cefn Road Southern Secondary Access
The LHA remain concerned that drivers approaching from the south may use this secondary access to avoid the signals at the main access. A condition will be required therefore that at the Reserved Matters stage, confirming that this southern secondary access will either not allow onward progression into the site, or that the internal layout would be a sufficient deterrent to drivers will be required.

On the eastern side of Cefn Road the proposed shared cycle/footway to the south of the access is shown as terminating into a footway only. No detail is provided as to how cyclists will rejoin the carriageway in a safe manner. Details such as this must be in keeping with and meet the requirements of the Welsh Government's Active Travel Act Guidance. **The LHA requires these details to be provided**

Bryn Estyn Road
In previous applications Bryn Estyn Road has been referenced as a possible location for an emergency vehicle access point. Confirmation is requested as to whether this is still a current proposal.

At the moment Bryn Estyn Road is an advisory cycle route and there has been a recent audit of this route by the Councils Active Travel Team outlining the issues with the route, the applicant is encouraged to engage with the Councils Active Travel Officer in regards to this review.

**Link Road –** The TA makes reference to the Link Road that will connect KSS2 South (this site) to the Golf Club roundabout through KSS2 North. The TA acknowledges that this Link Road mitigates the impacts of the full KSS2 build out. The TA also references the Spine Road for this site as being designed to act as the Link Road in the future. However, the TA does not reference how the Link Road will be delivered. There is reference to the applicant working '*proactively with the other stakeholders to progress the feasibility of the link road'*. However, given the full build out of this site is dependent on the Link Road being in place, **certainty of the Link Road being delivered in the necessary timescales must be demonstrated.** Furthermore, it is noted that in addition to crossing Council owned land, the full link road will also cross third-party land, not controlled by the applicant. **Given the link road is required to support the full build out the deliverability of the Link Road must be demonstrated.**

**Active Travel** – A scheme of this size will be expected to contribute to improvements to the surrounding Active Travel network to complement on-site provision. No off-site Active Travel improvements are proposed, therefore **engagement with the Council's Active Travel Lead – Gwen Thomas will be required.**

**Capacity Assessments**

Southern Primary Access – This junction has been modelled in LinSig. The LHA has reviewed the model output and makes the following comments:

- In the model Cefn Road is coded as being 7m in width. Elsewhere in the TA and in previous TAs for this application site, reference is made to width of c.6.6m.
- A four-stage arrangement is shown. It appears the intention is for Cefn Road (south) to run with an indicative green arrow (IGA) in stage 2 for the right turn into the site. If this is the case, a 4s minimum intergreen is needed between the Cefn Road north arm ending and this right turn phase starting. If this is an IGA stage, it will require a minimum green time of 4s, not 2s as included in the LinSig model.
- If the intention is that the right turn run as an IGA after the full green stage, an IGA aspect will be required in the signal head arrangement. This is not shown on the proposed layout.
- If the intention is that the right turn be a separately signalled stage this would require a separate signal head and full aspect arrangement, which is not shown in the proposed layout.

**The LHA require the above changes to be made the to the LinSIg model and the junction layout design**.

**Travel Plan** - Whilst this is an outline application, **the LHA will require a Framework Travel Plan to be submitted, to demonstrate the principle and commitment of the applicant to encouraging and enabling sustainable travel.**

**Refuse Collection / Recycling and Servicing**
The Councils waste management team are currently working on a new waste strategy and new collections policy which will be finalised shortly. Therefore the LHA would strongly recommend that the applicant consult with our Senior Waste Strategy Officer Gabrielle on 01978 729640 to discuss the requirements for the site going forward.

The current standards that WCBC work to (other than on unadopted roads):
- Refuse vehicles are 11.2m long and swept paths should be demonstrated within proposed highway layouts
- A refuse vehicle will not reverse further than 12m
- A maximum distance of 15m for refuse operatives or residents to walk to move a bin

**Summary**

Before Highway Authority can reach a view of the acceptability of the proposals and the details therein, further information is required from the applicant – this is as follows:

- **Cefn Road Northern Access**
    - Clarification needed on footway termination to the north of the proposed access.
    - Visibility splays must be unobstructed by mature trees or signage. It is requested that the position of the mature trees and the hedgerow be shown on the site access plan drawing to provide clarity that the visibility will not be obstructed by trees.
    - Clarification on the stopping of the pedestrian footway on Cefn Road is required.
    - Clarification is required as to how the footway widening on Cefn Road (east side) is to be achieved and whether this will be into privately owned land, which would therefore need to be adopted going forward.
    - Road Safety Audit is required for the site access junction.
    - Swept-path assessments based on the standard WCBC Refuse Collection Vehicle (RCV) must be provided to confirm the suitability of the site access junction.
    - Road safety audit required.

- **Cefn Road Southern Primary Access**
    - The is concern over signal avoidance by drivers as layout may not deter through traffic.
    - Cyclist re-entry to carriageway must be safely designed and appropriate transitions provided.
    - Active Travel provision must exceed shared footways. The proposed layout comprises of TOUCAN crossing which are not considered appropriate to encourage

trips by bike and does not comply fully with the Welsh Government's Active Travel Act Guidance. Appropriate segregated provision should be considered to ensure that the site can safely accessed by bicycle.
    - The spine road alignment includes a kink - clarification is required regarding the rationale for this.
    - Gradient and structural issues with verge tie-ins need resolution.
    - Guard railing justification needed.
    - Footway widening details and land ownership clarification required.
    - Swept-path assessments for buses and refuse vehicles required to confirm the junction can operate safely.

- **Cefn Road Southern Secondary Access**
    - Details of how cyclists will transition onto service road to the west side of the service road, south of the access junction should be provided. This must comply with Welsh Government's Active Travel Act Guidance
    - Concern over signal avoidance by drivers; layout must deter through traffic.

- **Spine Road**
    - Delivery certainty required due to dependency for full site build-out. This must include addressing third-party land ownership and Council land crossing.
    - A detailed cross-section of the proposed spine road must be submitted, showing:
    - Vehicular carriageway.
    - Segregated walking and cycling facilities on both sides, in line with Welsh Government Active Travel Guidance.

- **Traffic surveys**
    - For the avoidance of doubt it is requested that the TA include the 2023 turning movements
    - The LHA therefore require that the applicant provide the appendices to the traffic comparison note contained in Appendix B.
    - Details and when the 2023 traffic survey(s) took place to be provided.

- **Traffic Growth**
    - Further analysis is required to justify zero growth assumptions.

- **Trip Generation**
    - School trips - It is requested that clarification be provided on whether trip rates / distribution assumptions have been adjusted due to the assumed on-site school.
    - Trip internalisation – Details of the assumptions used, if any, regarding trip internalisation should be provided.
    - The LHA requires the trip generation for vehicles to be revisited and more appropriate sited used. A comparison table of the resulting trip rates and total generation compared to that presented in the TA is requested, to identify if addressing the above points has a material impact.
    - Non car trips - further details of bus movements and operational proposals are required before bus trip generation can be agreed.

- **Trip Distribution**
    - A comparison of trip distribution using the 2021 census data should be undertaken

- **Capacity Assessments**
    - Until the trip generation and distribution, traffic data and underlying traffic growth assumptions has been agreed it will not be possible at this stage to have confidence in the results of the capacity modelling presented within the Transport Assessment.
    - The coding in the LinSig modelling will also be required to be updated.

- **Collision Analysis**
- An assessment of accidents which occurred in 2023 should be included in the assessment.

- **Public Transport**
    - Further details of the bus strategy to serve the site, including service routings, frequencies, facilities and infrastructure proposals.
    - Should the bus loop be accepted, the LHA should provide details of this route both in terms of physical location and carriageway cross section must be provided.

- **Active Travel**
    - A greater level of Active travel provision should be provided on the site access junction. shared cycle/footways are not appropriate given this is a main spine road.

- **Offsite Highway Improvements**
    - It is requested that the resulting footway widths on the affected corners of the Greyhound Roundabout be provided on drawing VN23288.
    - **The applicant is required to submit a pedestrian crossing improvement scheme on the** Cefn Road approach to the roundabout, for approval by the LHA.
    - It is required that swept-path assessments be provided for the Greyhound Roundabout Improvements to demonstrate that proposals do not affect the ability for large vehicles to safely and efficiently negotiate the junction.
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- **Travel Plan**
    - A Framework Travel Plan should be to be submitted with the application in order to demonstrate the principle and commitment of the applicant to encouraging and enabling sustainable travel.

- **Refuse Collection / Recycling and Servicing**
    - The LHA would strongly recommend that the applicant consult with our Senior Waste Strategy Officer Gabrielle on 01978 729640 to discuss the requirements for the site going forward.

*KWEdwards*

Contracts & Engineering Manager

Chief Officer, Environment & Technical