MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO:	Jenni Perkins
Our Ref:	ET/DC/AO/P/2025/0430	**Your Ref:**	P/2025/0430
Date:	11/11/2025		

Town and Country Planning Act 1990 (as amended)

PROPOSAL: UNED GYFLOGAETH ARFAETHEDIG A MYNEDIAD NEWYDD I GERBYDAU, PARCIO AR GYFER CEIR A CHERBYDAU NWYDDAU TRWM, ARDAL WASANAETHU A STORIO, TIRLUNIO A GWAITH DATBLYGU ATEGOL / PROPOSED EMPLOYMENT UNIT AND NEW VEHICULAR ACCESS, CAR AND HGV PARKING, SERVICING AND STORAGE AREA, LANDSCAPING AND ANCILLARY DEVELOPMENT
LOCATION: LAND AT, OAK ROAD, WREXHAM INDUSTRIAL ESTATE, WREXHAM, LL13 9RG

Following previous comments a Transport Assessment (TA) has been submitted. The LHA comment on this as follows.

Swept-Path Analysis
Swept-path drawings are appended to the TA for the different vehicle types as previously requested by the LHA. The following comments are made:

- Centre line markings should be shown on Oak Road to allow a clear understanding of how vehicles exiting the site interface with traffic on Oak Road.
- The 16.5m articulated HGV turning left into the site appears to encroach into the oncoming traffic lane in order to make the turn into the site. This will need to be confirmed by the addition of centre line markings
- Similarly, it is difficult to confirm without centre line markings, but the left turn out of the site by a 16.5m HGV also appears to encroach into the oncoming traffic lane.

Site Access Plans
Further to the above, the site access plans included in the swept-path drawings indicate that the visibility splays from the site access will cross existing hedgerows and verge which have trees located within them. The LHA request confirmation of how these boundaries will be laid out and how the splays will interface with the existing trees.
The access plans show the provision of a 3m shared footway/cycleway along the site frontage. This is a welcomed addition and although it does not meet the aspirations of the Welsh Active Travel Act (WATA) Guidance, it is consistent with provision around the wider industrial estate. The access plan also shows how cyclists should transition from carriageway to shared provision. The previous LHA response stated that there should be compliant transition from carriageway to shared provision (and vice versa). **The detail shown is not compliant and must meet the standards set out in the WATA Guidance.**

It is also noted that on drawing P24012-001F the inset box on the plan showing the detail of the access dimensions, incorrectly shows 2m footways rather than 3m shared footway/cycleways. **This should be updated to avoid confusion and ensure consistency in the drawings.**

Previous LHA reviews identified that there was a need for signage at the entry and exit points to make clear to drivers unfamiliar with the access arrangements, which junction was for entry. **This detail has not been included on the site access plans and is therefore required.**

Parking Provision

The Council's parking standards are set out in Local Planning Guidance Note 16 (LPG16). LPG16 sets out maximum parking standards for various land use types. Whilst this presents maximum standards, the LPG is clear that parking provision must be fit for purpose. LPG16 states that "*In cases where the amount of parking provided is below the maximum the Council will need to be satisfied that this is appropriate for the likely level of demand*". LPG16 goes onto state that "*Development will not be permitted if there is insufficient parking on site and where as a result this will cause or increase highway problems*". Whilst the TA makes clear that parking provision is based on the applicant's operational requirements, planning permission (should it be awarded) would not be specific to the named applicant. The proposed parking provision may meet the applicant's requirements but should occupancy change, a future occupant may have a more conventional parking requirement, and a site tailored to one particular set of operational requirements therefore may not accommodate another. All the LHA can do in such circumstances is assess parking provision against LPG16. The proposed provision is significantly below the LPG16 maximum, by almost 45%, which raises significant concerns over the suitability of the proposal. The concern is that this under-provision will lead to over-spill parking on-street, with potential operational and road safety implications. Indeed, the road safety audit undertaken and provided in this submission, identifies concern that on-street parking could impact on achievable visibility splays.

Despite being previously requested, no details have been provided on the working patterns of the 140-staff stated as being based at the site. Therefore the LHA can only assume that there will be demand for c.140 spaces.

Sustainable Accessibility

Image 5.2 of the TA indicates areas reached by what are suggested to be 'acceptable' walking distances. It is noted that to reach many of the areas within the isochrones shown would involve pedestrians walking along roads which currently have no footways (Oak Road to the east for example) or walking across fields / undeveloped land where there are no footpaths / PRoWs. As such this diagram presents an unrealistic walking catchment. It is noted that current walking wheeling and cycling guidance reinforces that the quality and accessibility of a route is just as important as the distance involved. Just because a location falls within an acceptable distance does not mean it is achievable or attractive.

Statements in this section which highlight the accessibility of the development site, seem at odds with earlier sections that downplay the likelihood of pedestrian movements.

Section 5.3.5, Image 5.4 shows the estimated cycling catchment at 2km and 5km. Here also this plan suggests distances and locations that are not considered realistic, with significant areas indicated which could not be reached due to being in private ownership, lack of connections, or would involve cycling along the dual carriageways, which whilst possible, is only likely to be considered by experienced cyclists.

Traffic Forecasting

The TA refers to 'Guidance on Transport Assessments' (2007) as a "*useful point of reference regarding traffic impact at junctions",* suggesting in the lack of more recent or

local guidance this has been used as the basis for assessment. Guidance on Transport Assessments was withdrawn as formal guidance over 10-years ago but notwithstanding this, was never formally adopted by the Welsh Government, so should not be referred to. More recent and local guidance does exist in the Welsh Government's Transport Advice Note (TAN) 18, which the LHA note is referred to in the Policy section of the TA. In the TA, TAN18 is described as outlining "*the need for and the required content of TAs*" and that this document identifies how to understand the transport impacts of developments .
TAN 18 states at page 55 that as a broad guide the Assembly Government would regard an increase in turning movements in the order of 5%, on any arm, as material. **The LHA suggest that this threshold be used in the Transport Assessment.**

Vehicle Trip Rates: Initial LHA comments identified that trip rates were based on a number of survey sites that were classed as 'edge of town'. Wrexham industrial estate is a free-standing location rather than edge of town. The use of edge of town sites could skew trip rates. The TA suggests that "*the industrial estate bears a lot of similarities with other industrial units characterised as being edge of town, as opposed to the free-standing sites which are locationally more remote*". The TA in this section accurately describes the industrial estate as *locationally more remote* given its separation from the wider Wrexham area. The LHA remained concerned that the use of edge of town sites has the *potential* to affect (under-estimate) trip rates. Whilst it is noted excluding edge of town from the TRICS site selection would remove all comparably sized sites, this alone cannot be justification for the use of unrepresentative survey sites. The authors of the TA may therefore need to consider alternative approaches / first principles approach - possibly based on the applicant's existing site operations or surveying comparable operations on the industrial estate.
Notwithstanding the above, previous references to 140 staff being based at the site, do not correlate with the trip generation presented in the TA. Whilst it is accepted that not all staff will arrive / depart in peak hours, the presented peak period generation of 52-vehicle movements does not align with 140 staff. **The LHA will therefore require clarification of this.**

Committed Developments: the TA sets out the committed developments included in the build up of background traffic data. The TA notes that some of the sites referenced are the subject of yet to be determined planning applications. These yet to be determined sites include the significant strategic sites of KSS2 (Land south of Holt Road) and KSS3 (Utopia City). The LHA is concerned that the inclusion of such sites which have no planning status may skew the results of the TA and specifically any assessment of percentage or absolute impact at a junction level. **The LHA will accept this background traffic build up, but will require a sensitivity test which includes only those sites which have planning permission.**

Traffic Distribution: The TA assigns traffic to the network on the basis of the split in traffic volumes taken from the ATC on Oak Road. Whilst in theory this is reasonable, this may mask the onward route development trips will take to reach the wider network. Given the relatively restricted route options of the industrial estate and the onward network, the highway configuration of the industrial estate acts a ring-road, where in practice most trips to/from sites on the industrial estate route via roundabout junction of Bryn Lane / Ash Road North / Abenbury Way. The east/west split taken from the ATC therefore could result in a significant proportion of trips to/from this site routing through the above roundabout, either via Bryn Lane to the east or Redwither Road / Coed Aben Road / Abenbury Way to the west.
The TA states that the with the traffic build up and trip distribution as assumed there is no need to undertake capacity assessments. It is unclear how this conclusion has been arrived at as the appended traffic flow diagrams do not appear to include information to show how

development trips have been assigned other than at the site access junction, nor are any percentage or actual impact diagrams provided. **Given the concerns outlined in the paragraph above, the LHA will require sight of the information that underpins the conclusion that no assessments are required and that this be based on the TAN 18 approach, rather than aged, withdrawn and non-relevant 'Guidance on Transport Assessments'.**

Road Safety Audit:

The RSA Stage 1 appended to the TA identifies a potential issue with the visibility from the site access junction with the risk being that parked vehicles could impact achievable visibility. The Designers response to this point states that no parking issues are observed along Oak Road. This is the case at the current time, but this emphasises the need for and importance of suitable parking provision, to avoid the occurrence of over-spill parking from the application site and the potential road safety implications of this.

Construction Traffic Management Plan

A Construction Traffic Management Plan (CTMP) has been submitted. The CTMP identifies routes for HGVs that will facilitate construction and those specified are acceptable.

At Section 7 the CTMP identifies possible walking routes to the site. This plan indicates that Oak Road to the east of the built up area of the industrial estate is a walking route. **The LHA note that there are no footways present to the east of the eastern most edge of the industrial estate on Oak Road and this section of Oak Road should not be identified as a walking route.**

At Section 9 the CTMP sets out details of Site Parking. The CTMP makes reference to contractor / staff parking within the construction site. For the avoidance of doubt the LHA will not accept staff parking on the highway. **The LHA will require the CTMP to be updated to state that site induction rules will explicitly state all parking must be within the construction site. It will be the developer's responsibility to ensure no parking takes place on the highway. The LHA will also require the CTMP to be updated to show a plan indicating where and what quantum of on-site parking is to be provided.**

At Section 11, the CTMP sets out details of loading/unloading. For the avoidance of doubt no loading / unloading will be permitted on highway (other than at the initial site establishment stage). **The LHA will require this to be stated in the CTMP.**

Summary

The latest submission addresses a number of points raised previously by the Local Highway Authority. However, a number of points raised remain unaddressed and points of clarification required before the Local Highway Authority can reach a conclusion.

KWEdwards

Contracts & Engineering Manager

On behalf of Chief Officer, Environment & Technical