# MEMORANDUM

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| **From:** | Chief Officer, Environment & Technical | **To:** | Chief Officer Economy & Planning |
| | | **FAO::** | Philip Mullineux |
| **Our Ref:** | ET/DC/AC/P/2025/0697 | **Your Ref:** | P/2025/0697 |
| **Date:** | 7th January 2026 | | |

**TOWN AND COUNTRY PLANNING ACT 1990**

**PROPOSAL: HYBRID PLANNING APPLICATION: A) FULL PLANNING PERMISSION FOR CHANGE OF USE OF WAREHOUSE TO CLASS B2 (BREWERY) AND THE CHANGE OF USE OF BUILDING TO A MUSEUM/TAPROOM/RESTAURANT/SHOP, AND B) OUTLINE PLANNING PERMISSION FOR A NEW COMMERCIAL OFFICE BUILDING, CREATION OF PUBLIC REALM AND LANDSCAPING, ACCESSIBILITY IMPROVEMENTS INCLUDING NEW HIGHWAY INFRASTRUCTURE AND PEDESTRIAN FOOTBRIDGE, PARKING FACILITIES AND COACH/TAXI DROP OFF (SOME MATTERS RESERVED) / CAIS CYNLLUNIO HYBRID: A) CANIATÂD CYNLLUNIO LLAWN AR GYFER NEWID DEFNYDD WARWS I DDOSBARTH B2 (BRAWDY) A NEWID DEFNYDD ADEILAD I AMGUEDDFA/YSTAFEL DAP/BWYTY/SIOP, A B) CANIATÂD CYNLLUNIO AMLINELLOL AR GYFER ADEILAD SWYDDFA MASNACHOL NEWYDD, CREU PARTH CYHOEDDUS A THIRLUNIO, GWELLIANNAU HYGYRCHEDD GAN GYNNWYS SEILWAITH PRIFFYRDD NEWYDD A PHONT DRED I GERDDWYR, CYFLEUSTERAU PARCIO A LLE GOLWNG I BYSIAU/TACSIS (CADWIR RHAI MATERION)**

**LOCATION: LAND AT WREXHAM GENERAL RAILWAY STATION, STATION APPROACH, WREXHAM, LL11 2AA**

**Introduction**
The Local Highway Authority (LHA) acknowledges that a pre-application response was provided to the applicant prior to submission of this planning application. It is understood that this advice was issued immediately before the application was lodged, and therefore some matters previously raised remain relevant and require formal consideration as part of this statutory consultation response. The LHA has reviewed the submitted Transport Assessment (TA) and Framework Travel Plan accompanying the application.

**Background**
The TA sets out the data used to inform the TA. It appears the methodology used in the TA and much of the data used in the TA is taken from the WelTAG study. Whilst this is not unreasonable, it is noted that the WelTAG study was undertaken in 2023 and the data therein is close to what would be considered out of date. It is also noted that the football match-day data, which is used and referred to extensively in the TA, was captured in October 2023, when Wrexham AFC were in a lower league. Since that time attendance has significantly increased, meaning the data may not be accurate. Further comments on traffic data suitability are made later in this response,

The Council's Active Travel officer has been asked to provide comments on the proposals and will provide a separate response.

**Swept-paths**
Swept-paths are provided for the new access junction arrangement. These drawings appear unusual with stuttered lines. This may be due to drawing file conversion but the reason for this should be confirmed. Assumed vehicle speeds used in the assessments should also be confirmed. The swept-paths utilise a bus and a large refuse collection vehicle. Consideration should be given to whether articulated vehicles might need to access the site, for instance to service the brewery or possibly for railway maintenance purposes.

**Regent Road Alignment**
The signalisation of the junction introduces a right turn lane (into the station). The result of this is a dog-legged alignment for Regent Street (south-east bound, toward the junction with Central Road) where ahead movements have to move significantly over to avoid the right turn lane and then move back over. This introduces a potentially confusing layout and one which will require a Road Safety Audit to determine suitability. It is noted this ahead movement continuing on Regent Street is not included in the swept-path assessment, but should be.

**Bus Stops**
Within the site, bus stops are proposed for both inbound and outbound directions. The southernmost inbound bus stop is located near to the main junction. The swept-paths around this bus stop appear very tight and if a bus is not precisely positioned within the bus cage, it may not be possible for a second bus or larger vehicle to pass, which could cause blocking back into the junction. Ideally the inbound bus stops should be set further into the site. A swept-path will be needed to demonstrate that a bus exiting the northernmost inbound bus stop can make this movement safely and efficiently (given the presence of the kerb build out).

**Site Layout**
Within the site there appears to be parking bays on the inside curve of the access road into the main part of the site. The LHA would raise concerns over visibility to/of vehicles emerging from these bays given the restricted visibility of the curved alignment. It is recommended that the applicant confirm intentions in terms of highway adoption of the route into and around the site. Details will be required on how the short-stay/drop-off spaces will be managed / controlled. If these are not within highway boundary, the application of Traffic Regulation Orders (TROs) will not be possible. Given the low parking provision of the wider site, there will need to be some mechanism to prevent office/retail users from parking in station user spaces. Paragraph 6.26 of the TA refers to ‘including the future proofing former (sic) Jewson’s site’. Please could it be clarified what this means?

**Access Junction**
The proposed signalised access junction is located c.110m from the upstream, signal-controlled junction with Jacques Way and c.150m from the downstream junction with Bradley Road. During peak periods queues on Regent Street frequently block back from the Grosvenor Street junction to and beyond the station access, to the junction with Jacques Way. Consideration must therefore be given to how the new signal-controlled junction will interface with the existing signal-controlled junctions to either side.

**Car Parking Provision**
The TA states that a lower level of parking will be provided than required by the Council’s Parking Standards LPG note. It is noted that LGP Note No.16 presents maximum parking provision rather than minimum. Given the site’s location in terms of sustainable transport accessibility, this level of parking is considered appropriate in this instance, subject to the Travel Plan being accepted. Paragraph 6.6 of the TA states that 245sqm of the Gateway building will be retail assumed to not generate any primary trips. Given this is an outline application and that the end user of this area cannot yet be known, this is not considered an appropriate assumption at this point.

**Trip Distribution**
The TA indicates that trips to/from the development site have been distributed based on existing turning movements. Whilst this may be suitable for station users, it is unlikely to be accurate for the office trips. Brief analysis of the local network identifies that trips to/from the significant majority of the Wrexham built-up area would route to/from the west of the site. A more detailed and evidence-based approach to assigning development trips will therefore be required.

**Background Traffic Flows**
The TA refers to the proposal to reduce base traffic movements by 8% on the basis of Net Zero Wales targets. Further information will be required on this point before this can be accepted. An 8% reduction is not a specific WG target. There is no present evidence of a reduction in traffic flows in the city centre, therefore this assumption appears possibly too aspirational. The LHA are content for such a scenario and the no net-reduction scenario to be used, subject to suitable evidence being presented to support this. But this would be as a sensitivity test to a main assessment case of surveyed traffic figures with reasonable assumptions on traffic growth. This is particularly important as it is noted that notwithstanding later comments on the junction modelling, the proposed access junction is predicted to be operating at capacity with this net-reduction assumption included. As noted earlier, given the traffic data upon which this TA is based being relatively old and that the match-day data is certainly out of date, it is strongly recommended that new traffic data be collected to inform additional assessment.

**Assessment Scenarios**
Section 6.24 of the TA introduces the scenarios that have been assessed. These include a with and without events at the Racecourse Ground. No information is provided as to what this includes or assumes. Is this additional traffic demand, additional pedestrians and/or rail demand / pedestrian demand? This is a very important element of data and will need to be set out in detail, including where any data used in this scenario has been taken from.

Former Jewson's Site - The existing surveys are stated as including movements associated with the Jewson Building supplies operation. To ensure the TA presents as accurate an assessment as possible, it is recommended that these movements be removed from the assessment.

The proposals and corresponding assessment work assume that the WelTag scheme will be delivered in full. The applicant has not considered an scenario where the scheme does not come forward. The applicant should consider an additional scenario whereby the WelTag and corresponding network changes are not delivered.

**Junction Modelling**
The TA presents a comparison of a base scenario against the with-development scenarios. The base scenario appears to assume a signal-controlled junction, as only LinSig is used in the assessment. It is unclear why the existing priority-controlled arrangement has not been assessed, as this is the relevant comparison in terms of junction operation. The WelTAG study may have assumed that the Mold Road Active Travel scheme was present, but the LHA will require a comparison of the priority-controlled junction against the proposed signal-controlled junction. Para 7.17 of the TA presents the results of the no net-reduction scenario. It is noted that the TA refers to this as the worst-case assessment scenario. This is not the case. It may be the worst-case of the scenarios assessed to date in the TA, but it is not worst-case. In this scenario in the 2030 assessment year, the with-development junction operation exceeds the capacity threshold. The summary operational results presented in the TA suggest that the junction would be over-capacity even without the development, but this is not a true comparison as the signalisation of the junction would only occur as a result of the development. As noted above, comparison against existing junction operation is required to understand what impact the development will have.

The applicant needs to split out what the impact of the development is from the WelTAG scheme, for this junction and the junction of Central Road. The planning test is of the application proposals, rather than the WelTAG scheme, given the application does not include the WelTAG scheme.

The applicant will need to examine the impact of the development on other junctions. This does not necessarily mean modelling, but the impact of the development must be considered and demonstrated.

Operational Assessment
The LHA have reviewed the LinSig output included in the appendices and have the following comments:

- Results will need to be provided in the TA in the conventional manner: by arm, for DoS and MMQ.
- Confirmation will be required of how pedestrians/cyclists are represented? Is the crossing included in every stage and what cycle times are assumed?
- No consideration of any other junctions? This is despite the LinSig model including surrounding junctions.
- LinSig network diagram very hard to read.
- Intergreens look to be generic rather than measured and calculated? These should be based on the junction geometry and calculated using Chapter 6 of the Traffic Signs Manual.
- Minimum green times appear generic rather than measured – especially the long crossing phase over the station approach. These should be based on the junction geometry and calculated using Chapter 6 of the Traffic Signs Manual.
- The phase minimum show the pedestrian crossing over the A541 with a similar minimum green to the station approach crossing, when the latter is significantly longer.
- Pedestrian intergreen for the Station approach crossing seems short in relation to the much shorter crossover the A541.
- Model does not seem to reflect or take account of existing queuing along the corridor and appears to assume free-flow entry to/exit from the junction, when this is not the case during peak times.
- Given the importance of bus movements into the station (as well as possible improved station-bus access) should consideration be given to an indicative green arrow phase?

Whilst an outline application, the applicant should ensure that on-site cycle parking is provided to comply in quantity and quality terms with the Welsh Government Active Travel Act Guidance.

**Travel Plan**
The Framework Travel Plan submitted with the application is welcomed and aligns with Welsh Government guidance. Its objectives are to maximise active and sustainable travel, reduce single-occupancy car trips, and raise awareness of travel choices. Measures include provision of pedestrian and cycle infrastructure, a cycle hub and secure parking, a communications strategy incorporating travel packs and induction training, and promotion of car sharing and EV charging facilities. Salary sacrifice schemes for bikes and public transport season tickets are recommended.

The management structure includes appointment of an Overseeing Coordinator prior to occupation and individual Travel Plan Coordinators for units over 1,500sqm. Baseline staff travel surveys will be undertaken within six months of occupation, followed by biennial surveys for five years. SMART targets include a 5% reduction in single-occupancy car trips and a 5% increase in sustainable modes over the life of the plan. The LHA recommends that a Full Travel Plan is submitted prior to first occupation, building on the Framework version, and that annual monitoring reports are provided to WCBC for five years post-occupation. Funding commitments for Travel Plan implementation and monitoring should be secured by condition or legal agreement. The LHA considers the Travel Plan critical to mitigating the low parking provision and supporting sustainable travel objectives.

**Summary**
The LHA does not object in principle to the development, subject to updated traffic data and a revised TA addressing the issues outlined above, detailed junction modelling comparing existing and proposed arrangements, a Road Safety Audit for the access junction and internal layout, and a Full Travel Plan secured by condition or legal agreement, including monitoring and funding commitments. Clarification of adoption intentions for internal roads and management of short-stay/drop-off spaces will also be required.

*KWEdwards*
Contracts & Engineering Manager

On Behalf of The Chief Officer, Environment & Technical