

INTERNAL MEMORANDUM

Your Ref.: P/23/0065

Our Ref.: 23/0065

To: Town Planning – Development Control

FAO: Judith Jones

From: Engineering and Highways – Highway Development Control

Please ask for: Martyn Tanner

Date: 20/09/2023

OBSERVATIONS BY THE ENGINEERING AND HIGHWAYS DIVISION IN RESPECT OF DEVELOPMENT AFFECTING EXISTING OR PROPOSED PUBLICLY MAINTAINED HIGHWAY

PROPOSED DEVELOPMENT

Outline application for erection of a mixed leisure development comprising Indoor Snow Centre (up to 39,200 sq m), Water park (up to 7,500 sq m), Indoor Activity Centre (up to 9,000 sq m), Outdoor Activity Centre, Hotel Accommodation (up to 418 bedrooms), Woodland Lodge accommodation (up to 30 units), car parking (up to 830 spaces) and associated earthworks, access, drainage, servicing and utilities connections/infrastructure at Land To The South West Of The A470/A4102 Roundabout At Rhydycar West Merthyr Tydfil

PLANNING HISTORY

- P/08/0288 - Reclamation of land (by means of open excavation, including coal extraction and washing of coal from selected tips) and reinstatement works – Non determination Appeal – 22/05/09
- P/07/0524 - Residential development (Outline) – Refused – 12/09/08
- P/02/0260 - Comprehensive development: Retail, Leisure, Offices, Hotel, Football Stadium, Country Park and Residential uses, access, servicing, parking and landscaping – Secretary of State Call In – 10/03/03
- P/00/0371 - Leisure, retail, residential and business development – Refused – 27/10/08
- P/98/0100 - Creation of educational and recreational facility – Secretary of State Refusal – 16/12/98

HIGHWAY ASSESSMENT

Outline planning permission for a leisure development comprising:

- An indoor snowdome
- A waterpark
- An indoor and outdoor activity centre
- Hotel accommodation
- Forest lodge accommodation
- Car parking (up to 830 spaces); and
- Associated earthworks, access, drainage, servicing and utilities connections/infrastructure

Mott Macdonald were commissioned to assess the developments transport implications on behalf of the Highway Authority. This highway assessment includes a brief overview of the proposed access, internal circulation and parking arrangement followed by a summary of the Mott Macdonald reviews findings. The full Mott Macdonald review is attached for reference.

Access

Primary access to the proposed development would be via a new arm off the A470/A4102 Rhydycar Roundabout. Given that the A470 is part of the Trunk Road network, the acceptability of the proposed primary access is for the Welsh Government to determine.

Given the scale of the proposed development, a secondary emergency access is also proposed. The emergency access is located to the south of the development and extends between the proposed internal circulation roads to the existing highway network at the roundabout junction to Merthyr Self Storage on Abercanaid Road. The proposed secondary access route passes through an existing A470 underpass which measures circa 4m wide. Furthermore, the approach road to the underpass has an irregular paved width and narrows to circa 3.5m in places. As such, the proposed secondary access is insufficient to accommodate 2-way traffic flow, leading to the creation of traffic hazards to the detriment of highway safety and the free flow of traffic should it need to be used. Additionally, the route is currently a designated bridle way and crosses the Taff Trail. As such, vehicles using the access would be in conflict with vulnerable highway users, which coupled with the narrow width is considered unacceptable.

Circulation

The submitted illustrative masterplan indicates that the development's internal circulation arrangements consist of a primary access road that traverses the eastern side of the development before looping around to provide access to the car park and lodges to the south. There is also a service road that extends up the hillside to the top of the proposed snowdome. Proposed internal circulation arrangements are considered acceptable to ensure vehicles would be able to enter and exit the development in a forward gear.

Off-street Parking Provision

Vehicular Parking

The proposal consists of a multi up leisure development that have differing off-street parking requirements. Using Wales Parking Standards the applicant calculates the maximum off street parking requirement to be in the order of 2,297 spaces. Please see table 6.3 below extracted from the submitted Transport Assessment (TA):

Table 6.3 Maximum Parking Provision

Land Use	Maximum Standard	Development Quantum	Maximum Parking Provision
Hotels	1 space per 3 non-resident staff and 1 space per bedroom	418 beds (hotels) plus 30 Forest Lodges (assumed 15 x2 bed and 15 x1 bed)	463 spaces
Fitness Clubs, Leisure Clubs and Sports Clubs	1 space per 2 facility users	Peak leisure facility visitor accumulation is 3,408	1,704 spaces
Disabled Parking – For car parks associated with leisure or recreational facilities	A minimum of one space for each employee who is a disabled motorist plus 6% of the total car park capacity for visiting disabled motorists	6% of 2,178 spaces	130 spaces
Total			2,297 spaces

A total of 830 spaces are proposed which results in a significant shortfall of 1,467 spaces. The TA concludes that the proposed 830 spaces are sufficient for the developments needs and will be managed by a booking system so that the site cannot be oversold. However, there is little information submitted as to how the booking system would work. As such, the highway Authority is not satisfied that the proposed off-street parking provision of 830 spaces is sufficient to meet the developments demands. It is expended that a car park entry/exist assessment is undertaken based on the anticipated trip generation to the proposed development to ascertain any capacity issues within the car park during peak times.

Cycle Parking

A specific level of cycle parking provision is not proposed. Instead, it is stated that cycle parking provision would be provided in accordance with Parking Standards Wales. Given the scale of the development, there is no doubt that sufficient cycle parking provision can be provided and the ensured via condition.

Mott Macdonald Review

Mott Macdonald, on behalf of the highway authority, undertook a comprehensive review of the developments transportation proposals, focussing particularly on the submitted Transport Assessment (TA) Travel Plan (TP). A number of concerns or lack of detail were noted but it is anticipated that most could be resolved and/or will not fundamentally alter the overall conclusions. However, there are 2 aspects identified that have major concerns and need to be addressed prior to determining the proposal.

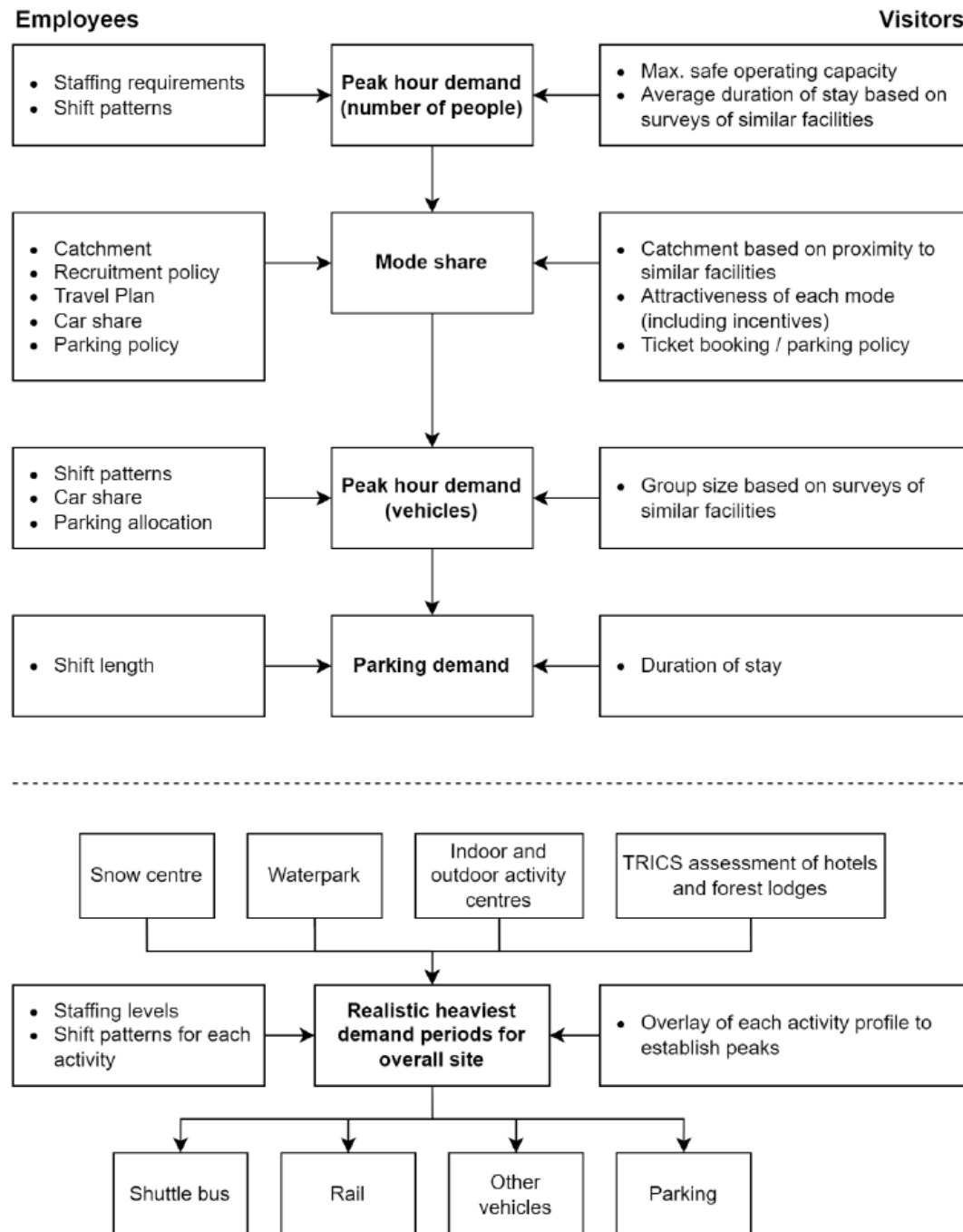
The review raises concerns regarding the anticipated trip generation associated with the development. There are 5 other snow related activity centres within the UK; however, they are typically half the size of the proposed development and are located within urban centres. At least 4 more are proposed, but again are smaller in scale and close to urban centres. It is expected that figures for the snow, pool and indoor/outdoor activity elements in particular should be predicted based upon how many customers would be able to safely use the facilities at any one time. The only foundation currently used for estimating demand is based upon Marvel Ltd visitor expectations with no explanation as to how these figures have been derived.

Secondly, there is no prescribed approach to the process of assessing transport impacts. A top-down or bottom-up approach which links to each stage should be undertaken, with the introduction of additional evidence/data at each stage and no unexplained gaps. Sensitivity assessments to understand the robustness of the calculations and the scale of impacts that variations in key estimates or assumptions may create.

Figure 4.1 below, extracted from the Mott Macdonald Review identify the expected approach to determine visitor/staff numbers:

Figure 4.1: Expected Approach Flow Diagram

Expected Approach



Source: Mott MacDonald

The review summarises that whilst the submitted TA and TP are comprehensive and examine all aspects of the expected best practise and statutory guidance, most of the calculations are based on limited evidence to support key estimates and assumptions. As such, it is not possible to be confident that the derived figures for trip generation, parking needs and impact on the highway or public transport networks are realistic.

A GIS assessment of Active Travel and public transport has been undertaken but is not reflected in the anticipated trip generation and mode share estimates. Instead, a very car orientated development for both staff and visitors is proposed with little evidence to demonstrate acceptable car parking provision.

The review concludes that the submitted TA and TP do not adequately support the proposals with significant gaps in the evidence based as well as estimation process and hence the veracity of the predicted impacts. Significant additional data, explanation of the calculations and justification of underlying assumptions would be required before a robust assessment of the transport impacts and adherence to policy can be concluded.

RECOMMENDATION

Highway objection is raised for the following reason(s):

1. The proposed secondary emergency access is sub-standard and its use would result in traffic hazards to the detriment of highway safety and the free flow of traffic.
2. Insufficient information has been submitted to demonstrate that the proposed off-street parking provision of 830 spaces for vehicles is sufficient to meet the developments demands at peak times, resulting in the potential for on-street parking demand in the vicinity to the detriment of highway safety and the free flow of traffic.

NOTES



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