

INTERNAL MEMORANDUM

Your Ref.: P/23/0065

Our Ref.: 23/0065

To: Town Planning – Development Control

FAO: Adam Foote

From: Engineering and Highways – Highway Development Control

Please ask for: Jacquie Hobbs

Date: 12-07-24

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

LOCATION

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 .

REVIEWED DOCUMENTS AND PLANS

Document Name	Document / Drawing Number	Date
Environmental Statement	Figure 1.2 Outline Masterplan P3	23
Environmental Statement	Transport Statement – Tetra Tech	Feb 23
Environmental Statement	Travel Plan – Tetra Tech	Feb 23
Response to MTCBC	Tetra Tech	Nov 23
Technical Note	01	18 th Jan 24

Letter	Comments from South Wales Fire and Rescue Services	28 th May 2024
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HIGHWAY ASSESSMENT

Development seeking outline planning permission for a leisure development comprising:

- An indoor snowdome (up to 39,200 m2)
- A waterpark (up to 9,000 m2)
- An indoor and outdoor activity centre (up to 24,000 m2)
- Hotel accommodation (up to 24,000 m2 / 418 bedrooms)
- Forest lodge accommodation (up to 2,000 m2 / 30 units)
- Car parking (up to 830 spaces); and
- Associated earthworks, access, drainage, servicing and utilities connections/infrastructure

The scheme was first brought to the attention of the highway authority in 2022 when the developer alerted the authority to a PAC report for the proposed scheme ... this was followed by a pre-application consultation 2022/2023 and finally an Outline application in March 2023.

The applicant submitted within their suite of documents a Transport Assessment and a Travel Plan for review. Due to the scale of development the Merthyr Tydfil County Borough Council commissioned Mott Macdonald to assess the developments Traffic / Transport implications on behalf of the Highway Authority.

Over this period of time there has been ongoing communication between the applicant, their highway consultant and the highway authority. To allay the authorities concerns during this period two additional technical notes have been submitted for consideration .

Proposed Vehicle Access Arrangement

Primary access to the proposed development is proposed via a new arm off the A470/A4102 Rhydyar 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.

However, a second transport note, dated 18th of January 2024, provided a comprehensive assessment of the developments anticipated trip generation this using the same methodology used for a similar development at Swindon, which in turn drew on real world data from similar sites at Milton Keynes and Castleford. The revised trip generation is lower than that used in the initial Transport Assessment for the snow dome element of the development.

Given the scale of the proposed development, a secondary emergency access is also proposed and required by the Highway Authority. The emergency access is proposed to be located to the south of the development and extends between the proposed internal circulation roads to the existing adopted highway network at the roundabout junction to Merthyr Self Storage on Abercanaid Road.

The emergency access route passes through an existing A470 underpass which measures approximately 4m in width. Furthermore, the existing approach road to the underpass is irregular along its length and narrows to circa 3.5m in places. As such, this proposed access is insufficient to accommodate 2-way traffic flow along its length. As an emergency route such width restrictions meant that should the need arise the route could not safely accommodate large emergency vehicles travelling in both directions simultaneously. It was therefore concluded that this emergency route as detailed would not be unsuitable for the proposed use given the scale of the development and its potential use should there be a major incident on the site.

It is noted that the applicant has provided swept paths along the proposed emergency route, however, they have only demonstrated that two way vehicle movement can be achieved with cars They have not demonstrated the worst case scenario, that is the requirement for two way movement of emergency vehicle's.... this is crucial with any emergency access on the site of a development of this scale.

It is noted from comments made from the South Wales Fire and Rescue Services that not only should the development cater for adequate water supplies on the site for firefighting purposes and to this end provide Fire Hydrants and the recommended intervals, the development should also provide for emergency firefighting appliances.

From the submitted documentation it is apparent that the proposed emergency route into and out of the site is unacceptably restricted in width which could lead to the creation of traffic hazards along its length, to the detriment of highway safety and the free flow of traffic during optimum use.

It should also be noted that this proposed emergency route is currently a designated bridle way and crosses the Taff Trail. As such, in an emergency when this route is needed vehicles would be in conflict with vulnerable highway users, which when coupled with the narrow width of the route is considered wholly unacceptable.

It is clear that the proposed emergency route in terms of geometry is not to the required standard for the potential use, this coupled with no clear emergency traffic management plan which should consider all users of the route gives rise to serious highway safety concerns.

Access via sustainable modes

The submitted Transport Assessment and the Travel Plan aim to give full details of how the proposed development will address transport sustainability and provide mitigation such that over the coming years there will be a modal shift from private vehicles to alternative modes of transport (walking, cycling, public transport) .

The submitted documentation states that the developer estimates that there will be 1.59 million visitors coming to the site annually, with the potential of the snow centre generating c750, 000 visitors a year alone.

There is an expectation that the staff required would largely come from local residents and it is expected that the site would require approximately 842 Full Time equivalent employees. Whilst the documents don't state shift patterns the nature of the development will mean that in all likelihood many of the staff would work a shift pattern, as yet to be determined.

Whilst the documentation states target modal shift such targets are well below "The Wales Transport Strategy 2021. target that 45% of all journeys will be by alternative modes of transport rather than private vehicles. Within the Travel Plan it states that the "Travel Plan will endeavour to achieve a 15% reduction in single occupancy vehicle trips whilst increasing cycling, walking, public transport and car sharing. Their target is to increase active travel and public transport by 50% and to promote car sharing.

However, there is no time frame to the targets to be achieved and given the nature of the development many of the visitors will already be car sharing and single occupancy vehicles will in all probability be mostly staff working on a specific shift pattern.

The applicant has stated that it considers that the Travel Plan should remain as a living document in perpetuity, and not just for the usual 5 years. Given this commitment the highway authority would expect to see baseline modes and yearly targets such that by 2040 the target of 45% of all journeys into the site are via alternative modes as required by "The Wales Transport Strategy 2021. Within the documentation there should also be penalties should the yearly targets not be met, such penalties should include hard measures to be agreed with the authority.

In terms of alternative transport modes the applicant has considered walking, cycling, bus and rail.

Pedestrian Access - The key pedestrian route into the site would be via the existing overbridges (A470) and (A4102) that links into the Taff Trail. The applicant states that there is an intention to upgrade this route from the local leisure Village into the site with, signing, lighting etc. However, there is no mention of suitable pedestrian routes into the town centre. Given the potential for walking to the development, the highway authority would expect to see a map showing key suitable pedestrian routes from the town centre with any shortfalls regarding their suitability being mitigated by the developer. Given that it is anticipated that much of the workforce on the site will be local then such a review is vital to understand

what is required to encourage walking to the site on routes that are direct and well signed. Signage of routes is key so that pedestrians do not inadvertently use roads with no associated footways such as the A4102 which would give rise to highway safety concerns. The documentation largely focuses on Multi modal journeys where walking is part of the journey for a visitor, consideration of the potential numbers of local staff wishing to walk to the site has not really been fully considered. This is contrary to Active Travel Wales Act 2013 which requires Authorities to provide improved facilities for local pedestrians and cyclists.

Cyclists – The majority of cyclists coming into the site will be staff and therefore, full details of cycle appropriate routes from key residential areas into the site should be provided. Such routes should be audited and mitigation proposed where there are shortfalls. E-bikes are now well established as a viable commuting mode of transport and it should not be underestimated. Such bikes allow those who would not normally cycle the opportunity to do so. For this reason cycling to the site by staff should be fully explored and provided for.

Bus – On reviewing the documents it's clear that many of the bus's which could be used for a multi-modal trip do not operate seven days a week or 24 hrs a day ... focussing on visitors the documents do not consider the possible 24hr requirement of the expected staff working on the site.

Whilst bus time tables and services are outside the control of the applicant the proposed shuttle service is not. It appears that it is this service which is key to helping meet the modal shift targets. However, using such a service will come at a cost to the visitor, and whilst it states that there will be a shuttle service for each arriving / departing train into Merthyr Tydfil, the cost of the service may be prohibitive to larger families. At this stage no pricing points have been proposed but to really engage the visitor such a facility should come as part of the entrance costs ... that way to park within the site is an extra rather than the sustainable option being the extra cost. The shuttle service for the visitor must be further explored given the scale of the development and the shuttle bus potential.

The submitted documents state that the proposed shuttle service can be used by staff, however, given the staff numbers and possible shift patterns the applicant should have considered a specific staff shuttle service so that staff are not competing for space with that of visitors. Whilst the shuttle service is acceptable in principle again it hasn't been fully developed to meet the possible needs of the proposed levels of staff on the site.

Whilst the shuttle service will clearly assist in modal shift for both visitors and staff, as stated above in its current format the authority do not feel the proposals go far enough to encourage its use and thus make an impact on modal shift.

This proposed development will be located out of town, its target client will be active families with all the paraphernalia that comes with such visitors. Therefore, the use of the private vehicle will no doubt initially dominate. To stay on track year in year out to achieve the required modal shift will be challenging, however, the applicant will need to ensure that using a multi modal journey will be as attractive as possible in terms of usage and journey times. Any visitor shuttle service must be able to accommodate large families / luggage and be accessible to all. Pedestrian / cycle routes must be as direct as possible and accessible to all with distinct signage. For local staff there should be tangible incentives to use alternative modes of transport ... vouchers for ebikes, cycles and the use of a dedicated shuttle service.

The submitted documentation has not demonstrated all of the above and so without this commitment the highway authority have serious concerns regarding the proposed attractiveness of the site in terms of modal shift and the use of sustainable transport modes and therefore currently does not meet policy requirements as mentioned above .

Internal Vehicular 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.

On site Vehicular Parking provision

The proposal consists of a multi up leisure development that have differing off-street parking requirements when set against the Wales Parking Standards 2014. Within the submitted documentation 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, although it must be stressed that parking standards are maximum and not minimum standards. 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 was little information submitted as to how the booking system would work. As such, the highway Authority was not satisfied that the proposed off-street parking provision of 830 spaces was sufficient to meet the developments demands. The authority required that a car park entry/exist assessment was undertaken based on the anticipated trip generation to the proposed development to ascertain any capacity issues within the car park during peak times.

An updated parking assessment was provided to Mott MacDonald in January 2024. The largest change to these figures was the inclusion of a 15% reduction in trips due to cross-visitation between multiple attractions and reflected in car park calculations.

Using these updated figures, the maximum number of cars estimated within the car park at any given time is assumed to be 613 on a weekday, and 773 on a Saturday. With the cross- visitation factor removed, the maximum numbers reach 705 and 889 respectively.

Whilst the broad cross-visitation factor is accepted, actual cross-visitation will impact the number of entries and exists significantly more than on-the-ground parking. Parking spaces will largely be occupied throughout a visitors stay, in which case any new visitors will result in the car park going over capacity.

It is assumed, therefore, that the parking requirements and calculations need further considerations. The calculation provided does not consider the likely demand from other factors including staff or peak events. It is felt that when these factors are taken into account, the parking demand will exceed the supply of 830 quoted within the initial TA.

The TA does not address this point or identify any overspill parking areas for these considerations, in which case it is assumed that there is a risk of on-street parking outside the site, parking at other sites

(such as Merthyr Leisure Village) nearby, or illegal parking within the site causing a safety risk and possible congestion within the development.

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 within the site and therefore secured by condition as recommended.

Timeline of Mott MacDonald Highway Authority Reviews

Mott MacDonald, on behalf of the highway authority, undertook a comprehensive review of the developments transportation proposals, focusing particularly on the submitted Transport Assessment (TA) Travel Plan (TP).

September 2022

Mott MacDonald issued a review of these proposals to MTCBC in September 2022. The following observations and recommendations were made:

- No recognition of the convoluted nature of existing active travel routes and no mitigating measures proposed.
- Operation of a secondary access under the A470 underpass considered unrealistic due to width constraints.
- Discrepancies in parking requirement calculations and trip rate estimates, including no assumptions for seasonal demand tidalities.
- Mode share assumptions considered to be unrealistic, including an unjustified reduction in rail mode share and an increase in private car share.
- The location of the site was deemed unsuitable when assessed against national planning policy in addition to unsuitable transport arrangements and environmental considerations caused by vehicular emissions). The assessment made light reference to policy matters without demonstrating how the development sought to adhere to them.

Following the review of proposals completed by Mott MacDonald in September 2022, the applicant entered a pre-application consultation process whereby draft proposals were made available for initial review by MTCBC and other stakeholders.

This gave the opportunity for the applicant to address concerns or provide additional supporting evidence. MTCBC provided feedback and Tetra Tech, on behalf of the developer, produced an amended TA and TP in acknowledgement of the recommendations within MTCBC's PAC response. The final reports for submission were issued in February 2023.

Mott MacDonald completed a second round of review for MTCBC through to September 2023. Following the review completed by Mott MacDonald in September 2023, and the subsequent recommendations, the ensuing series of issues were left unaddressed:

- Whole site reliant on single access with no clarity on the acceptability of the 'emergency' access – the definition of 'emergency' use and views of emergency services have not been established. The existing configuration of the underpass under the A470 is unsuitable for both emergency and general traffic due to the presence of a 'pinch point' under the bridge and unsuitable paving conditions that fall outside of the development's boundaries.
- Proposed upgrades to the Active Travel network but no details provided – walking/cycling routes from Merthyr town centre are convoluted and currently in poor condition, in addition to poor accessibility for

disabled users. There is a potential for pedestrians to walk down the A4102 road, which is unsuitable and has no pedestrian access, resulting in a safety risk.

- The proposals mention operating a shuttle bus between the rail and bus station and the development but without details on timetable, fares, availability to staff etc.
- Major shortcomings in the trip rate calculations – grouping all the activities together and assuming the same patterns for every week of the year, downgrading expectations of rail mode use based on capacity despite Welsh Government commitments to the South Wales Metro, journey time and frequency improvements. Mode share calculations also fall short of policy targets.
- No disaggregation between staff and customer travel assessments despite recognition that the catchments, arrival and departure peaks and duration of stay would be markedly different.
- No link between the trip rates and the parking demand based on typical group size, duration of stay etc.
- Poor adherence to national planning policy (including Planning Policy Wales and Future Wales) due to the unsustainable location of the site adjacent to the A470.

The review summarised that whilst the submitted TA and TP are comprehensive and examine all aspects of the expected best practice 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 concluded that the submitted TA and TP did not adequately support the proposals with significant gaps in the evidence base 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.

November 2023

Following the meeting on 21 November 2023 with the Rhydycar West development team, it was agreed that Tetra Tech would provide further background information on the trip generation and parking demand estimate for the snow dome aspect of the development.

Tetra Tech provided links to the previously referenced Swindon snow centre Transport Assessment submitted to the Swindon planning authority. Whilst the snow slope element of the Swindon development has yet to be constructed, the Transport Assessment drew on survey/record data from existing snow centres at Milton Keynes and Castleford. These were used to calculate trip generation, mode shares and parking demand at peak times for the proposed Swindon operation. It should be noted that this type of information was requested during our initial review of the Rhydycar application and was not provided prior to this meeting.

It demonstrated that many of the concerns raised in the initial 2022 review of the Rhydycar development were addressed by the Swindon applicant. It was made apparent that any reassessment of Rhydycar West based on the Swindon data would materially affect the peak period parking demands and potentially the wider highway impacts.

January 2024

A technical note was submitted by Tetra Tech on 18 January 2024 which provided additional details on the potential volume of peak time users at the snow dome and other facilities and the associated parking requirements.

This was discussed and explained further at a meeting held on 23 January 2024, after which assisting information on the Therme Manchester application was received.

After a number of subsequent discussions regarding evidence based sources, calculation methodology, underlying assumptions and management 'commitments', the following conclusions were reached and submitted to MTCBC by Mott MacDonald:

- Whole site reliant on a single access with no clarity on the acceptability of the 'emergency' access.
- Agreement to commit to a free shuttle bus for staff and customers – but no detail provided in terms of frequency and capacity of service.
- Upgrades to the walk/cycle route but no details provided.
- Evidence base from other similar existing centres provided (Swindon and Therme Manchester).
- Recalculation of trip assessments utilising the new evidence allowing for seasonal fluctuations.
- Calculation of car park demand based on group size, duration of stay etc, drawn from the new evidence.
- Proposal to manage the car park through advance booking arrangement.
- No separate assessment of staff travel other than car parking would be 'controlled' via staff travel plan.
- Reduction of trips by 15% to reflect cross-visitation, but the parking duration figures were not updated to reflect this.
- Limited information on staff movements and parking arrangements.

CONCLUSION

The developer has made a number of subsequent re-assumptions following the outcomes of meetings outlined above. However whilst there appears to be a commitment to the recalculation of trip and parking assessments provided in the original submissions, the operation of the car park remains a concern with the potential for 'overflow' onto the local road network or neighbouring developments (such as Merthyr Leisure Village) during peak periods.

There is also a significant concern over the impact of operational transport carbon emissions associated with the project. Whilst it is appreciated that there is a level outside of the control of the applicant to mitigate against these emissions, more details on the measures would be beneficial.

In terms of sustainability and the reduction of the use of private vehicles and the increase use of sustainable modes of transport the highway authority having considered all submitted information feel that the applicant has not shown that policy targets can be met and there is clear areas where there is a lack of information to suggest alternative modes of transport will be equally desirable to that of private vehicular transport.

POLICY CONTRIBUTION

Transport Policy

An assessment has been made as to how well the site proposals, as outlined in the Transport Assessment and Travel Plan, contribute towards Welsh Government policy and the commitments to

sustainable travel targets outlined by the Llwybr Newydd – the Wales Transport Strategy (WTS) and Planning Policy Wales (PPW).

Whilst the reports have referred to policy aspirations, the development proposals lack significant provisions to meet these targets. This includes:

- An overall sustainable mode share assessment of 10% (5% rail, 3% bus and 2% Active Travel), significantly lower than the WTS targets of 45% by 2040. The submitted documentation fails to demonstrate yearly targets or provides details of further mitigation should targets not be met.
- A parking strategy which is misaligned with Planning Policy Wales (PPW). The development relies significantly on private car use and does not follow the urban design principles outlined by PPW to support modal shift to walking, cycling and public transport.
- High reliance on private car use will result in an increase in vehicular emission levels (NO_x and PM) and not contribute towards Net Zero Wales.

The development falls short on local policy aspirations set by MTCBC, including the MTCBC Decarbonisation Plan 2023-2030, the South East Wales Valleys Local Transport Plan and the MTCBC Local Development Plan. These policies commit to the encouragement of sustainable travel and to significantly reduce carbon emissions from transport. There are a number of shortfalls within the documentation and therefore, it is considered that given the visitor and staffing numbers mitigation proposed will not be enough to fully encourage sustainable transport modes.

Planning Policy

The assessment also considered the adherence with and acknowledgement of relevant national planning policy, including those defined within Planning Policy Wales – Edition 12 and Future Wales: The National Plan 2040.

In addition to the shortcoming in transport arrangements as outlined above, the assessment demonstrates a poor lack of adherence with, and in some cases conflicts to, Planning Policy Wales and Future Wales.

This is reflected in the unsuitable location of the site on the west side of the A470, with a singular main access for all traffic accessing the site likely to cause disruption on the local and trunk road network at peak times. There is limited acknowledgement of potential growth in demand and how the site seeks to sustainably manage this.

There are also limitations to public transport access to the site, limiting the scope of travel to the site by sustainable means. This contravenes the good design principles outlined in Planning Policy Wales, with ease of access to the site limited and not fully mitigated against.

Sustainability and Carbon

A separate carbon assessment has been completed by Mott MacDonald to summarise the work undertaken to assess and mitigate the carbon emissions of the development. In addition to the vehicular emissions outlined in Section 3.5, it is assumed that there will be a level of adverse environmental impacts from the construction, repair and maintenance, general operation of the site and end-of-life decommissioning.

The assessment concluded negligible effects for operational energy expenditure, minor adverse impacts for construction and major adverse impacts for operational transport.

The operational transport assessment estimated emissions for two isolated years across the travel categories: local, regional and national. Using the traffic flow data from the TA and the average distance assumptions for these categories, the total vehicle kilometres have been estimated and as such the emissions.

Total annual emissions for 2025 (considering 15% Electric Vehicle (EV) usage) are estimated at 61,450 tCO₂e, whilst for 2031 (considering 43% EV usage) total annual emissions are estimated at 50,249

tCO2e. The difference between the two years is due to the increased EV uptake reducing emissions balanced by the increased traffic volumes increasing emissions.

Mitigation measures provided by the TA include the provision of a shuttle bus, engagement with sustainable transport modes and provision of education for transport initiatives, however these are deemed as inadequate to address the operational transport emissions significantly when assuming the high private car use reported in the TA is maintained.

Operational transport mitigation is assessed at high level, despite this being the biggest contributor of emissions from the project. It is appreciated that there is a level outside of the control of the Applicant to mitigate against these emissions but more details on the measures would be beneficial.

In conclusion therefore the highway Authority consider that the proposed development is unacceptable as it fails to demonstrate the following:

- Clear considerations for parking demand based on accurate trip generation data.
- Unacceptable proposed emergency access for all potential vehicles. Proposed routes width would result in unacceptable delays and would in all probability disrupt traffic on both the local highway network and trunk road network
- Attractive options for sustainable modes, as public transport and Active Travel links are convoluted and do not extend far enough to the town centre. That the proposed shuttle service can cater for the expected demands for all and also relies heavily on external factors such as bus and train operators.
- Poor environmental considerations, to address the adverse environmental impacts from the construction, repair and maintenance, general operation of the site and end-of-life decommissioning.
- Alignment with significant national transport and planning policies (WTS, PPW and Future Wales)

It is for the above reasons that the highway authority recommend refusal of the planning application.

RECOMMENDATION

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

- 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.
- 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.

The Proposed scheme is contrary to both the Wales Transport Strategy (WTS) and Planning Policy Wales (PPW). In so far as it has not demonstrated within the documentation evidence to show that the proposed mitigation measures will achieve a target of 45% of journeys into the development will be undertaken by alternative modes of transport .. and providing only minimal enhancement of local cycle/ pedestrian links,

If planning are minded to grant permission of this planning application the Highway Authority request that the following conditions are attached to any permissions granted:-

- Development shall not commence until a car parking strategy plan detailing how the proposed car park will operate together with the proposed booking system have been submitted to and approved in writing by the Local Planning Authority. The approved plan shall be adhered in perpetuity unless agreed otherwise in writing by the local planning authority.

Reason: To ensure the adequacy of the proposed off-street parking provision to ensure vehicles are parked off the public highway, in the interests of highway safety and the free flow of traffic.

- Development shall not commence until full details of the proposed shuttle bus, both for visitors and staff including pick-up/drop-off points, booking system and any charges, have been submitted to and approved in writing by the Local Planning Authority. The approved details shall be adhered in perpetuity unless agreed otherwise in writing by the local planning authority.

Reason: To provide and promote alternative means of access to the site other than private motor vehicles, in the interests of sustainability and the free flow of traffic.

- Development shall not commence until full details of the improvement to the proposed emergency access have been submitted to and approved in writing by the Local Planning Authority. The approved details shall be implemented on site prior to beneficial use of the development.

Reason: to ensure the adequacy of the proposed emergency access, in the interests of highway safety and the free flow of traffic.

- Prior to beneficial use cycle parking shall be provided in accordance with Wales Parking Standards 2014 and retained for the purpose of cycle parking only in perpetuity.

Reason: to encourage sustainable means of travel.

- A Travel Plan which sets out proposals and targets together with a timescale, to limit or reduce the number of private vehicle journeys to the site and to promote travel by sustainable modes of travel shall be submitted to and approved in writing by the Local Planning Authority prior to beneficial occupation. Annual reports demonstrating progress in promoting sustainable transport measures shall be submitted on each anniversary of the date of the planning consent to the Highway Authority. The financial penalties to be applied for non-compliance with the targets set out in the Travel Plan should be agreed with the Local Planning Authority.

REASON: To ensure satisfactory provision for alternative travel modes to and from the site and use of sustainable travel.

- Prior to commencement a Construction Traffic Management Plan (CTMP) shall be submitted to and approved in writing by the LPA. The document shall give full details of the following :

Means of access into site for all vehicles

The parking of vehicles for site operatives and visitors

The management of vehicular and pedestrian traffic

Loading and loading of plant and materials

Storage of plant and materials

Wheel cleaning facilities

I trust this is of assistance

A handwritten signature in black ink, appearing to be 'J Hobbs', written over a faint rectangular box.

Ms J Hobbs

pp Carwyn Morris CEng MICE
Head of Engineering and Highways