MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO::	Matthew Phillips
Our Ref:	ET/DC/MZ/P/2024/1209	**Your Ref:**	P/2024/1209
Date:	03/01/2025		

TOWN AND COUNTRY PLANNING ACT 1990

PROPOSAL: DYMCHWEL YR ANNEDD BRESENNOL A CHODI 8 O FFLATIAU GYDA LLEFYDD PARCIO A MYNEDFA CYSYLLTIEDIG / DEMOLITION OF EXISTING PROPERTY AND ERECTION OF 8 APARTMENTS WITH ASSOCIATED ACCESS AND PARKING

LOCATION: 22 BRYN ESTYN ROAD, WREXHAM, LL13 9NB

I refer to your consultation / email dated 17/12/2024 in respect of the above.

It is the LHA's understanding that the proposals are for the demolition of the existing residential dwelling and the erection of 8 apartments with associated access and parking.

The existing access is sited within the 20mph element of Bryn Estyn Road, the visibility to the west is somewhat restricted by the high level fence along this boundary. The proposals seem to indicate the removal of the existing access and the provision of a new access sited further to the east of Bryn Estyn Road. The proposed access is sited within the existing stretch of 60mph carriageway, however the LHA estimates typical vehicle speeds at being around 30mph in both directions given the geometry of the road fronting the development site. As such visibility splays of 2.4m x 43m should be provided in either direction measured to the nearside edge of the adjoining highway in accordance with Manual for Streets.

The latest information indicates a speed survey has been undertaken but speeds in different directions have not been provided. The 85th Percentile speed is the standard measure used in Highways and the data states 28/29 was recorded, therefore the 2.4m x 43m requested was robust. Arguably on the basis of the data provided 2.4m x 40m would be acceptable. The applicant is indicating that visibility to the drivers eye is acceptable, however, the LHA feels that at this point the carriageway is wider than single track and as such there could end up with overtaking vehicles and therefore the visibility requirements are needed to the nearside edge of highway, especially for pedestrian safety as there are no footways at this point and you may get a pedestrian walking in the carriageway at this point. Furthermore clarification is required over the land ownership to the east of the site entrance as there are concerns that the visibility splay may pass through third party land and not be under the control of the applicant or the highway authority.

The proposed site access tapers to just 4m width which is not sufficient for two vehicles to pass simultaneously and should be widened to ensure this doesn't result in vehicles reversing back into the carriageway on Bryn Estyn Road. Any proposed shared access in this location would need to be

at least 4.5m wide, paved with hard bound materials for at least 5m behind the adjoining highway with any gates being setback at least 5m behind the adjoining highway.

There is no proposed segregated entrance for pedestrians and therefore the pedestrians would need to access the site through the vehicular entrance.

The proposals are for eight number two bedroom flats. LPG No 16 states that for two bedroom dwellings, upto 2 car parking spaces could be provided per unit. The proposals include 9 car parking spaces, one per dwelling and one visitor space which falls short of the maximum standard. The submitted TA makes reference to census car ownership data for MSOA Wrexham 10 which indicates that residents of 69.9% of apartments in this area do not own a car or van. MSOA covers the city centre of Wrexham and therefore it is unlikely that these figures are directly comparable, as the accessibility of the city centre is much different to the proposed site. There are also concerns that overflow parking could cause an obstruction on Bryn Estyn Road which could reduce visibility of pedestrians. 10% of the car parking spaces should be enlarged (accessible) spaces and an accessible route to the building from said spaces should be detailed.

Two secure cycle parking spaces per dwelling are required to be provided via safe and secure communal cycle parking areas. The proposals provide no detail in regards cycle parking and therefore clarification is requested to this end, the provision of 16 cycle parking spaces is required to meet the standards set out in LPG No 16. A covered and secure cycle store should be provided.

The submitted site layout plan indicates the provision of a bin store, however, the store provided seems small for the development proposed and therefore the LHA recommends that this is increased in size to accommodate the bins required.

The site is likely to require servicing by delivery vehicles, and there are concerns that there is insufficient space within the site for a 7.5t panel van to access and egress in forward gear, there is limited turning space within the site and the LHA recommends that the site is redesigned to accommodate adequate turning space for service vehicles. Within the revised information, excerpts have been provided, the LHA requests the full print out with the size of the vehicle from the autotrack print shown on the drawing.

In its current form the proposals are not acceptable on highways grounds, further information is required in relation to:

- Appropriate visibility splays are required to be shown on a scaleable plan.
- The site entrance is not wide enough to support simultaneous access and egress, which could result in vehicles needing to reverse into the public highway which is not acceptable on highway safety grounds. Pedestrian access should also be considered.
- Insufficient information has been provided in regards to cycle parking
- The Waste store looks undersized for the size of the site
- There is inadequate space within the site for a 7.5t panel van to turn to enable deliveries to the site. It is essential that vehicles are able to access and egress in forward gear.
- A review of parking provision should be undertaken, incorporating accessible spaces.



On behalf of Chief Officer, Environment & Technical