MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO::	Emma Bailey
Our Ref:	ET/DC/MZ/P/2024/1386	**Your Ref:**	P/2024/1386
Date:	13/03/2025		

TOWN AND COUNTRY PLANNING ACT 1990

PROPOSAL: AMNEWID PLOT I DDATBLYGIAD CYMERADWY P/2007/0686 (NEWID Y MATHAU O DAI A GYMERADWYWYD A FFYRDD AR Y SAFLE) / PLOT SUBTITUTION TO APPROVED DEVELOPMENT P/2007/0686 (ALTERATIONS OF APPROVED HOUSE TYPES AND ONSITE CARRIAGEWAYS)

LOCATION: LAND AT, WREXHAM ROAD, RHOSTYLLEN, WREXHAM, LL14 4DH

I refer to your consultation / email dated 23/09/2024 in respect of the above.

The principle of access to the development and impact on the public highway was established in the past planning application no P/2007/0686, it is noted that the access points into the existing public highway appear to be unchanged. There were a number of conditions placed on the previous approval which need to be addressed as part of the proposals including the following:

5. A scheme demonstrating an appropriate traffic signal controlled junction at Church St / Wrexham Rd junction shall be submitted for further approval by the Planning Authority in consultation with the Highway Authority prior to any development commencing on site. The scheme is to include improvements to the alignment of the existing bus stop layby. The approved scheme shall be implemented prior to occupation of the first dwelling.
6. A scheme demonstrating appropriate puffin crossing points on Wrexham Road shall be submitted for further approval by the Planning Authority in consultation with the Highway Authority prior to any development commencing on site. The approved scheme shall be implemented prior to the occupation of the first dwelling.
7. A scheme demonstrating an appropriate roundabout at the junction of Eldon Grove and Wrexham Rd shall be submitted for further approval by the Planning Authority in consultation with the Highway Authority prior to any development commencing on site. The approval scheme shall be implemented prior to occupation of the first dwelling.
8. Prior to commencement of development, a scheme demonstrating improvements to the Henblas Rd junction with Wrexham Rd shall be submitted for the further approval of the Planning Authority. The scheme as agreed shall be implemented prior to occupation of the first dwelling.
9. Prior to commencement of development a scheme demonstrating improvements to the Church Street junction with Wrexham Rd shall be submitted for further approval of the Planning Authority. The scheme as agreed shall be implemented prior to occupation of the first dwelling.

11. Full details of a pedestrian link from the proposed development site to the existing church car park shall be submitted for the approval of the planning authority. Such details as agreed shall be implemented to an agreed timescale and retained thereafter.
12. Prior to any development commencing on site, a scheme of improvements to bus stop facilities shall be submitted for the further approval of the Planning Authority. The approved scheme shall be implemented prior to the occupation of the first dwelling.

Parking standards

For residential use the following maximum parking standards apply according to LPGN16:

- 1 bedroom dwelling average of 1.5 spaces per unit
- 2 bedroom dwelling 2 car parking spaces per unit
- 3 & 4 bedroom dwelling 3 car parking spaces per unit
- 2 secure cycle parking spaces per dwelling

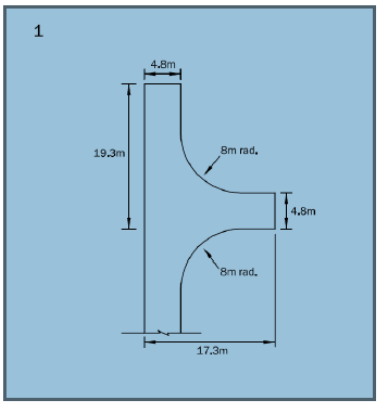
WCBC doesn't accept garages as available parking, it is noted that there are an extensive number proposed within the site which will not be counted towards the parking requirements, which results in the parking proposed across the majority of the units proposed falling below the standards. A shortfall from the standards could cause overflow parking on local roads or footways, especially in circumstances where the roads are narrow and with an extensive curvature.

Aco drains or similar will be required to be constructed across private driveways where they fall towards the adopted highway.

Cycle parking is required to be provided at a rate of 2 secure cycle parking spaces per dwelling, in the case of flats this should be provided via safe and secure communal cycle parking areas. Further details on the required cycle parking design specification requirements is set out in Local Planning Guidance Note No 16.

Highway Layout

Vehicle tracking of all turning areas should be provided to indicate that refuse vehicles can safely turn within the site. From a review of the plans provided it is likely that many fall below the Wrexham's standard detail for adoptable turning heads and that some will likely rely on the use of unadopted areas to make turning manoeuvres. The applicant should demonstrate compliance with Wrexham's standards and that 11.2m refuse vehicles can turn safely without the use of unadopted land. Many of the turning heads shown appear smaller than the WCBC turning head standards shown below.



Footways are required where there are frontage properties in excess of five in number (private drives should have a maximum of a five dwellings), footways should be a minimum of 2m wide. Furthermore, the Active Travel Act Guidance steers that you should provide priority for pedestrians, rather than for drivers, the proposed parking layouts seem to provide priority for drivers and cars

rather than pedestrians. The LHA recommends a 2m wide footway is provided with appropriate street lighting columns.

The current standards that WCBC work to (other than on unadopted roads):

- Swept paths are required within highway layouts for a 12m fire tender
- Refuse vehicles are 11.2m long and will not reverse further than 12m
- A maximum distance of 15m for refuse operatives or residents to walk to move a bin

Consideration should also be given to turning facilities for medium sized delivery vehicles (i.e vehicles approx 7.5 tonne) on private drives or shared surface areas. Swept paths should be provided and demonstrated. No swept paths have been provided within the submission.

Visibility splays are required to be demonstrated across the site, design speeds should be 20mph within the site and visibility splays of 2.4m x 25m demonstrated at all junctions and communal access points.

Residential Parking

The submitted plans provide the following information:

- 126 Houses (15 affordable) and 22 apartments (all affordable) - 148 dwellings in total
- Approximately 346 car parking spaces allocated to dwellings, 45 visitor parking spaces and ten further spaces allocated with a letter C – which could be electric vehicle charging points, but are at the furthest point in the site away from a vehicular access point, so not the best in terms of access.
- Cycle storage for bicycles serving the apartments is not shown. To encourage sustainable travel at the site we recommend that cycle parking is provided here at the minimum rate of two per dwelling.

No schedule has been provided detailing the parking provision for each dwelling. A check has been undertaken of parking provision dwelling by dwelling using the plans provided. It appears that the level of parking provided is below the maximum standards. In summary:

Houses				
Bedrooms	**Dwellings**	**Max CP Standard**	**Spaces Provided**	**Comment**
5	2	4 per dwelling per 5 bed	2/3 per dwelling	Provision below maximum standard
4	50	3 per dwelling	2 per dwelling	Provision below maximum standard
3	50	3 per dwelling	2 per dwelling	Provision below maximum standard
2	24	2 per dwelling	1 or 2 per dwelling	Provision below maximum standard
Apartments				
Beds	Dwellings	Maximum CP Standard Calculated	Spaces Provided	Comment
1	22	1.5 per unit	It appears that 1 car parking space is provided per flat with some visitor spaces provided	Provision below maximum standard

Landscaping

There are areas of landscaping shown within the site, the LHA requests confirmation that a management company will maintain all landscaping within the site and within the required visibility splays.

Layout Issues

There are also a wide array of issues with the proposed parking arrangements and courtyard accesses, some afford limited forward visibility due to the location of the building or fence lines near to them, furthermore some are not located at 90 degrees to the kerbline which is essential to afford adequate pedestrian visibility. Some are located within close proximity to junctions too with driveways for plots (for example) 105, 140 angled in such a way that vehicles will reverse in the circulatory carriageway of a roundabout. A wide array of amendments are required, as the layout seems exceptionally tight. Visibility splays of 2.4m x 25m are required from access points. Adequate pedestrian visibility is required from all driveways also.

In regards to the visitor parking bays, often these have been sited in footways which is not acceptable on highway safety grounds. Clarity is required over where footways are located or where service strips are proposed. It is the LHA's view that where there are frontage properties in excess of five in number dwellings a footway should be provided along the frontage. The Councils design guide also states that a road width of 5.5m is required for a number of dwellings in excess of 25, to the eastern end of the site a road width of 4.8m wide is proposed to access over 30 vehicles and therefore this should be increased in width and some of the localised bends removed to ensure access is available for emergency vehicles and refuse vehicles.

The maximum number of dwellings on a shared drive should be five and there needs to be compliance or adequate arrangements for waste management and servicing as detailed above, including turning space for a medium sized delivery vehicle. Swept paths are required to be demonstrated for all shared drives.

The LHA is concerned that shortfall from the maximum parking standard could cause overflow parking on local roads within the site and the arrangements which include long stretches of dropped kerbs / driveways in places could further reduce the availability of on-street parking to accommodate visitors or overflow parking. Whilst the provision of visitor parking is welcomed, this seemed adhoc and much designed at the edges of the scheme or in locations that blocks pedestrian access. Parking spaces seem to have been located without full consideration of whether there is adequate manoevring space or turning provision.

There are concerns with some of the courtyard parking arrangements proposed and the distance from the front door of some of the dwellings to the parking spaces / driveways. It is possible that this could lead to car owners deciding to park on street closer to their dwelling rather than use their remote space. The applicant should review this and provide spaces as close to the appropriate dwellings as possible in order to comply with the guidance in Manual For Streets and WCBC's SPG No 24. There is no provision of accessible space in this area for the apartments either which does not accord with the requirements set out in LPG 16.

Long lengths of parking spaces are noted within the site which will undermine priority for pedestrians and may impede pedestrian safety by impeding the visibility of pedestrians or small children.

In many private drives provided there are not 6m aisle widths provided behind the proposed driveways / car parking spaces. These need to be provided to allow vehicles to exit in forward gear otherwise driveways or parking spaces should be widened to allow turning within the car parking space, if this methodology is employed swept paths for a large car are required for driveways and there needs to be adequate turning space at the end of private drives for a 7.5tonne delivery vehicle. Private drive 9 has an inadequate turning head for service vehicles and the manoeuvring space appears inadequate for cars to turn.

No details have been provided in regards to the pumping station within the site, will it require servicing, what size of vehicles will service and can they be accommodated on the highway network. Clarification is required and swept paths of the vehicle should be demonstrated.

A minimum of 2m width footways should be provided for pedestrian only use or 3m for cycle and pedestrian use, footways and service strips may also require street lighting.

The applicant should liaise with Wrexham's Active Travel Lead, Ms Gwen Thomas available at gwen.thomas@wrexham.gov.uk to agree proposals to be in keeping with current active travel.

Overall the plots look very tight, building lines need to be set back and visibility between drives and footways / pedestrians improved. Pedestrian visibility splays from drives of 2m x 2m are required to ensure pedestrian safety isn't compromised.

In places shared private drives are as narrow as 3m width, whilst these could operate as traffic calming features, concern remains that this causes obstruction and encourages vehicles to reverse in areas where there are no dedicated footways to protect pedestrians. A minimum of 4.1m width is required to allow two cars to pass each other, this is concerning where access is available in both directions (such as close to plot 210-213).

Driveways should be located at 90 degrees to the footway/highway, oblique angles restrict visibility for drivers and can compromise pedestrian safety.

Priority needs to be with pedestrians, much of the site layout plan indicates vehicle accesses kerbed out, they need to be simply dropped kerbs across footways and there should be footways to access all properties.

Some driveways are located within 10m of the internal junctions proposed which could compromise highway safety, plots 94, 99,156,157,140, 146, 104, etc.

The design and location of plot 93 should be reconsidered as there is no maintenance corridor to the side, it is not acceptable for the footway to be required to maintain this dwelling.

The driveway and parking arrangements for plots 95 and 96 have restricted visibility due to the proposed location of the building line and the substation and should be redesigned to improve forward visibility.

Shared private drive no 5 is not acceptable as it is located too close to the junction with Wrexham Road. This is not acceptable on highway safety grounds and should be set back to beyond 15m from the junction.

If two car parking spaces are located behind a garage the driveway length is required to be 10.5m for an up and over garage door, for three spaces, 15.5m is required.

Accessibility into garden gates should be considered, plots 164-167 will only be accessible if no cars in the parking spaces. This could impede cycle storage and access to bins.

Driveway visibility needs to be considered carefully, especially when adjoining high level garden fencing or visitor parking spaces located in visibility splays – ie plots 159, 168, 169, 226, 162, 163, 130, 131, 132, 133

Further details of service strips and street lighting will be required, this should also be considered carefully around private drives and shared surface areas.

Care needs to be taken to ensure shared private drives affix to the carriageway and don't encourage drivers to drive over lengths of proposed footway, ie shared private drive 13. This arrangement would benefit from a service strip along the south side and a unobstructed footway on the north side where the residential properties are proposed to be located.

Clarification is required for some barrier / vehicle restrictive measure between access roads such as private drive 11 and access road 9.

Off – site highway works

Whilst it is appreciated that there are no amendments to the way the proposals connect into the public highway and that conditions for the off-site highway works have been discharged. Welsh Transport Policy has changed in the intervening period since the original approval and the LHA would request that it would be beneficial to add cycle crossing facilities into part of the Eldon Grove junction improvements. The LHA would recommend the applicant connect with the WCBC Active Travel Officer gwen.thomas@wrexham.gov.uk to agree a suitable arrangement.

Furthermore, the junction arrangements for the roundabout at Eldon Grove look different on the current plans to those approved within the condition discharge application and the LHA would advise that any amendments from the previous approved plans would need further agreement and permission.

Conclusion

While there are no objections in principle to residential development on this site there are a wide array of issues that need to be addressed within the submission in order to be acceptable on highway safety grounds. There are a range of the issues found that could compromise highway and pedestrian safety. Therefore the LHA would recommend a thorough review of the proposals from a safety and operational perspective are undertaken. Additional information is required in terms of swept paths, adequate turning facility provision and clarification about the use and servicing of the cellular storage area.

Conditions required

- Prior to commencement of any works, a Construction Traffic Management Plan should be submitted for approval covering both the demolition and construction phase.
- The LHA notes that Street Lighting should also be provided
- Stage 1/2 Road Safety Audit should be carried out
- A Travel Plan incorporating measures to encourage sustainable travel.



on behalf of Chief Officer, Environment & Technical