MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO:	Dafydd Thomas
Our Ref:	ET/DC/PP/P/2024/1692	**Your Ref:**	P/2024/1692
Date:	07/04/2025		

TOWN AND COUNTRY PLANNING ACT 1990

DYMCHWEL CAPEL ENGEDI AC EGLWYS FETHODISTAIDD BRYMBO A CHODI 16 O FFLATIAU / DEMOLITION OF ENGEDI CHAPEL AND BRYMBO METHODIST CHURCH AND ERECTION OF 16 APARTMENTS

ENGEDI CHAPEL AND BRYMBO METHODIST CHURCH, HIGH STREET, BRYMBO, WREXHAM, LL11 5BL

I refer to your consultation / email dated 09/01/2025 in respect of the above.

General

The proposed development comprises the demolition of an existing church and erection of an apartment block comprising 16 no. one bed apartments.

Access

The proposed development site is bounded by the High Street and Tai Owain (cul de sac) which are both unclassified roads subject to a 20mph speed limit.

Existing Access off Tai Owen

Tai Owain is a narrow, unclassified road (cul de sac) subject to a 20mph speed limit. However, the LHA would estimate typical vehicle speeds at being around 10mph given the geometry of the road / proximity to the junction with the High Street. Tai Owen currently provides access to a small parking area for the church and an existing WCBC Retirement Housing Complex and its associated car parking area. This section of road is typically 3.3m wide with a 1m wide footway on its eastern side. An existing public footpath runs along Tai Owain (PROW No. 1 – Brymbo).

There is an existing 3.6m wide access off Tai Owain which appears to provide access to a small car parking area capable of providing parking and turning for approximately 5 cars. The access is hard paved and gated at 1.3m behind the edge of carriageway.

Based on typical speeds of around 10mph along Tai Owain, any proposed / existing access would need to provide visibility splays of 2.4 x 11m in both directions measured to the centerline of the

adjoining highway. Visibility from the existing access is inadequate providing splays of approximately 2.4 x 7m in both directions (to centerline) being impeded by the existing boundary walls.

Existing Access – High Street

The High Street is an unclassified road subject to a 20mph speed limit.

However, the applicant has conducted a speed survey which indicates an 85th percentile wet weather speed of 20.5mph. However, limited data has been submitted in respect of the duration of the speed survey, how the speed survey was conducted (ie/ ATC or radar), where the monitoring equipment was placed and why only southbound measurements were recorded. **The LHA recommend this detail is clarified.**

It is not clear if there was an existing vehicular access in use off the High Street. This detail has not been provided within the application. **The LHA recommend this detail is clarified.**

Proposed Accesses

The submitted layout plan indicates 2 proposed accesses as follows:-

Proposed Access off Tai Owain

The submitted layout plan indicates a widened dropped kerb access to serve 2 no. parking spaces to mobility standards. Such an access will require visibility splays of 2.4 x 11m in both directions measured to the centerline of the adjoining highway based on typical speeds of 10mph.

Adequate pedestrian visibility will also be required from this access measured from the centreline of the vehicular access 2.4 metres back from the back edge of the footway to points 3.3 metres either side measured along the back edge of the footway. Within these splays there shall be no obstruction in excess of 0.6 metres in height above the level of the adjoining highway. The splays shall thereafter be permanently retained clear of any such obstruction to visibility.

The LHA recommend the full extent of the proposed / required visibility splays including pedestrian visibility splays are indicated on a suitably scaled layout plan.

If the application is supported, any proposed access / parking area will need to be surfaced with hard bound materials with no gates being erected. An Aco drain or similar will be required to intercept private surface water run-off where an access falls toward the highway. **The LHA recommend this detail is indicated on a revised layout pan.**

Ideally the proposed parking provision off Tai Owain should be provided with appropriate off road turning provision. The LHA would question how adequate turning / maneuvering will be provided given the proposed parking spaces only have 3.1m of carriageway plus a 1m wide footway behind them. LPGN 16 requires a minimum of 6m clearance behind a parking space for turning. **The LHA recommend this detail is reviewed / clarified.**

Proposed Access off High Street

Based on typical speeds of 20mph, any proposed / existing access would require visibility splays of 2.4 x 25m in both directions measured to the nearside edge of the adjoining highway.

However, the applicant has conducted a speed survey which indicates an 85th percentile wet weather speed of 20.5mph. The LHA have queried the level of detail submitted with this speed survey (see above).

If 20.5mph was accepted as the 85th percentile speed, this would require visibility splays from the proposed access of 2.4 x 25.5m in both directions measured to the nearside edge of the adjoining highway.

The submitted layout plan (Drg. No. J000488-SK-102 Rev A) indicates splays of 2.0 x 25m to the south measured to the nearside edge and 2.0 x 25m in the northerly direction measured to the centerline of the adjoining highway. The LHA would not accept these splays both in terms of a reduced setback distance from 2.4m or measuring to the centerline of the carriageway in the northerly direction for a shared access of this nature and its location. The carriageway width at the required points of visibility (SSDs) is at least 4.1m in both locations.

It is understood that a previous planning appeal was allowed (ref: P/2017/0319) in June 2018 for the re-development of the site for 9 no. 2 bed apartments. This development utilized an improved access further south along the High Street frontage. **The LHA recommends the applicant reconsiders the location of the proposed access and indicates this detail on a revised layout plan.**

Appropriate dropped kerb / tactile crossing points will be required across the proposed main access setback to the narrowest point of the access in the interests of pedestrian safety. The new limit of adoption will need to be extended to the back of any proposed crossing points. The applicant will need to enter into a S 38 / 278 agreement with the Council to construct the proposed access / crossing points. **The LHA recommend this detail is indicated on a revised layout plan from any re-located access.**

Any proposed access shall be surfaced with hard bound materials for a minimum distance of 5m behind the adjoining highway. No gates shall be located across the proposed access. **The LHA recommend the applicant clarifies if any proposed gates or barriers are proposed setback within the proposed access and how such features would be managed to avoid any backing up of vehicles onto the adjoining highway**.

Proposed Footway / Crossing Improvements

The submitted layout plan (Drg. No. 006 Rev H) indicates the construction of a 1.886 – 1.816m wide footway extending along the frontage of the site along the western side of the High Street.The LHA recommend that this footway is increased to 2m wide and extends up to the corner of the junction with Tai Owain providing a continuous footway link along this side of the High Street towards the existing bus stop to the south of the site and beyond. The existing footway provision on the eastern side of the road is typically sub-standard and an improved footway on the western side of the High Street along this section would be considered beneficial. Appropriate dropped kerb / tactile crossings will need to be provided across this junction.

Existing visibility at the junction of Tai Owain with the High Street is limited in the northerly direction providing a splay of approximately 2.4 x 12m measured to the nearside wheel track. The existing boundary wall impedes visibility at this junction. The extension of a 2m wide footway along this section would significantly improve visibility in this direction from this junction.

The LHA recommends the applicant indicates the above footway and junction visibility improvements on a revised layout plan.

The proposed dropped kerb / tactile pedestrian crossing points indicated on the submitted layout plan (Drg. No. 006 Rev H) across the High Street are considered acceptable.

Limited details of the undercroft access have been provided. The LHA typically recommend a maximum access gradient of 1:24 for the first 10m behind the adjoining highway then a maximum of 1:12 thereafter. No details of any footway links into the undercroft parking area have been indicated. Details of the proposed headroom through the undercroft access will need to be provided. It is assumed that WCBC Building Control Section will need to check such details in

respect of access for emergency service vehicles. **The LHA recommends the applicant indicates the above details on a revised layout plan.**

Parking & Turning Provision

Adequate parking & turning provision will be required in accordance with LPGN 16 requirements.

Based on LPGN 16 requirements, the proposed development (16 no. 1 bed apartments) would require a maximum of 1.5 spaces per apartment equating to the maximum requirement of 24 spaces. The proposed layout plans only indicate the provision of 16 no. spaces which is a 33% shortfall compared with LPGN 16 maximum standards. **The LHA consider that a shortfall from maximum standards for this development could cause overflow / indiscriminate parking on local roads or footways.**

However, it is understood that a previous planning appeal was allowed (ref: P/2017/0319) in June 2018 for the re-development of the site for 9 no. 2 bed apartments. This development comprised 9 no. 2 bed apartments and was approved providing only 10 parking spaces (44 % shortfall from maximum stds). LPGN 16 would have required a maximum of 18 parking spaces.

Based on this previous decision, it may be considered difficult for the LHA to object to the proposed level of parking provision at the development site.

The proposed undercroft parking indicated on the submitted plans complies with LPGN 16 requirements in terms of layout / dimensions and space for turning.

On the assumption that the proposed development site may need to be scaled down and reconfigured, it would be considered beneficial to delete the access / 2 no. parking spaces off Tai Owain given the narrow nature of the road should it be possible to accommodate such spaces within an amended undercroft car park.

Cycle Parking / Storage

LPGN 16 require sufficient space to provide at least 2 secure cycle parking spaces per dwelling. In the case of flats, this should be provided via safe and secure communal cycle parking areas. This would require a minimum of 32 cycle spaces. Insufficient detail has been provided to demonstrate this provision. **The LHA recommends the applicant provides a revised layout plan indicating the details of the proposed cycle storage facilities ie/ stands, spacing of stands, secure covered storage with appropriate lighting.**

Turning Provision – Delivery Vehicles

It is not clear how any delivery vehicles visiting the site will turn / drop off within the curtilage of the site. **The LHA recommend the applicant demonstrates how such vehicles will turn / drop off within the curtilage of the site on a suitably scaled plan when the proposed parking spaces are fully occupied.**

Sustainability

Given that there are a limited number of shops / local services in close proximity to the site, the LHA would not consider the site to be in a highly sustainable location. It is considered that relatively frequent trips would be made by residents into Wrexham City Centre and other areas which would not necessarily be made using public transport.

Car Parking Management Plan (CPMP)

If the application is supported with limited parking provision then **the LHA would recommend a condition requiring the submission of a car parking management plan to include details of how such parking arrangements will be managed to ensure there is no overspill of parking onto the adjoining highway.**

Swept Path Details

Swept path details have been submitted which indicate the turning movements of an estate car parking / accessing the proposed spaces at the site.

The swept path details for the proposed 2 no. mobility spaces do not accurately show the kerbline / width along Tai Owain (both sides) which is only 3.1m wide. This detail is required. The swept paths show a car sweeping over the proposed hard standing area / internal footway which is unacceptable. **The LHA recommends the applicant addresses these issues and indicates this detail on a revised layout plan.**

The swept path details for the proposed 14 no. spaces in the undercroft parking area appear acceptable. However, as indicated above, it is not clear how any delivery vehicles visiting the site will turn / drop off within the curtilage of the site. **The LHA recommend the applicant demonstrates how such vehicles will enter (in both directions) / turn / drop off / exit (in both directions) within the curtilage of the site on a suitably scaled plan when the proposed parking spaces are fully occupied.**

Traffic Generation

The submitted Transport Statement includes TRICs data for 11 no. sites with the following characteristics:-

- Affordable flats
- Sites with 6 – 25 dwellings
- Date Range of surveys: 01/01/2003 – 07/10/2016
- Selected Locations:
  Suburban Area
  Edge of Town
  Neighbourhood Centre

The LHA request that privately owned flats are used in any TRICs submission.

TRICS survey data must be no more than 8 years old. **The submitted data exceeds this criteria.**

The LHA do not consider the site to be within a suburban or edge of town location so data is irrelevant. Either Neighbourhood Centre or Free-standing sites will need to be reviewed.

The LHA request that sites from Ireland are not included in any revised TRICs analysis.

The LHA await the submission of revised TRICS data.

Refuse Collection / Recycling

The LHA recommend that the applicant consults with our Senior Waste Strategy Officer Gabrielle Povey (Senior Waste Strategy Officer) on 01978 729640 to discuss the above detail and the

adequacy of any area allocated to waste collection. The LHA have requested comments on the submitted details from the Waste / Recycling Section and will forward comments when they are received.

The submitted layout plan (Drg No. 006 Rev H) indicates double access gates opening onto the highway which is unacceptable. The LHA recommend that any gates open into the development site. This will need addressing on a revised layout plan.

Construction Traffic Management Plan (CTMP)

If an application for development is supported at the site, the LHA recommend any permission includes the following condition:-

No part of the development shall commence until a Construction Traffic Management Plan including provisions for contractor parking has been submitted to and approved in writing by the Local Planning Authority and the plan as is approved has been fully implemented.

In conclusion, the LHA request the following information:-

- Existing Access – High Street

  The applicant has conducted a speed survey which indicates an 85th percentile wet weather speed of 20.5mph. However, limited data has been submitted in respect of the duration of the speed survey, how the speed survey was conducted (ie/ ATC or radar), where the monitoring equipment was placed and why only southbound measurements were recorded. **The LHA recommend this detail is clarified.**

  It is not clear if there was an existing vehicular access in use off the High Street. This detail has not been provided within the application. **The LHA recommend this detail is clarified.**

- Proposed Access off Tai Owain

  The submitted layout plan indicates a widened dropped kerb access to serve 2 no. parking spaces to mobility standards. Such an access will require visibility splays of 2.4 x 11m in both directions measured to the centerline of the adjoining highway based on typical speeds of 10mph.

  Adequate pedestrian visibility will also be required from this access measured from the centreline of the vehicular access 2.4 metres back from the back edge of the footway to points 3.3 metres either side measured along the back edge of the footway. Within these splays there shall be no obstruction in excess of 0.6 metres in height above the level of the adjoining highway. The splays shall thereafter be permanently retained clear of any such obstruction to visibility.

  The LHA recommend the full extent of the proposed / required visibility splays including pedestrian visibility splays are indicated on a suitably scaled layout plan.

- If the application is supported, any proposed access / parking area will need to be surfaced with hard bound materials with no gates being erected. An Aco drain or similar will be required to intercept private surface water run-off where an access falls toward the highway. **The LHA recommend this detail is indicated on a revised layout pan.**

  Ideally the proposed parking provision off Tai Owain should be provided with appropriate off road turning provision. The LHA would question how adequate turning / maneuvering will be

provided given the proposed parking spaces only have 3.1m of carriageway plus a 1m wide footway behind them. LPGN 16 requires a minimum of 6m clearance behind a parking space for turning. **The LHA recommend this detail is reviewed / clarified.**

- Proposed Access off High Street

Based on typical speeds of 20mph, any proposed / existing access would require visibility splays of 2.4 x 25m in both directions measured to the nearside edge of the adjoining highway.

However, the applicant has conducted a speed survey which indicates an 85th percentile wet weather speed of 20.5mph. The LHA have queried the level of detail submitted with this speed survey (see above).

If 20.5mph was accepted as the 85th percentile speed, this would require visibility splays from the proposed access of 2.4 x 25.5m in both directions measured to the nearside edge of the adjoining highway.

The submitted layout plan (Drg. No. J000488-SK-102 Rev A) indicates splays of 2.0 x 25m to the south measured to the nearside edge and 2.0 x 25m in the northerly direction measured to the centerline of the adjoining highway. The LHA would not accept these splays both in terms of a reduced setback distance from 2.4m or measuring to the centerline of the carriageway in the northerly direction for a shared access of this nature and its location. The carriageway width at the required points of visibility (SSDs) is at least 4.1m in both locations.

It is understood that a previous planning appeal was allowed (ref: P/2017/0319) in June 2018 for the re-development of the site for 9 no. 2 bed apartments. This development utilized an improved access further south along the High Street frontage. **The LHA recommends the applicant reconsiders the location of the proposed access and indicates this detail on a revised layout plan.**

Appropriate dropped kerb / tactile crossing points will be required across the proposed main access setback to the narrowest point of the access in the interests of pedestrian safety. The new limit of adoption will need to be extended to the back of any proposed crossing points. The applicant will need to enter into a S 38 / 278 agreement with the Council to construct the proposed access / crossing points. **The LHA recommend this detail is indicated on a revised layout plan from any re-located access.**

Any proposed access shall be surfaced with hard bound materials for a minimum distance of 5m behind the adjoining highway. No gates shall be located across the proposed access. **The LHA recommend the applicant clarifies if any proposed gates or barriers are proposed setback within the proposed access and how such features would be managed to avoid any backing up of vehicles onto the adjoining highway**.

- **Proposed Footway / Crossing Improvements**

The submitted layout plan (Drg. No. 006 Rev H) indicates the construction of a 1.886 – 1.816m wide footway extending along the frontage of the site along the western side of the High Street.The LHA recommend that this footway is increased to 2m wide and extends up to the corner of the junction with Tai Owain providing a continuous footway link along this side of the High Street towards the existing bus stop to the south of the site and beyond. The existing footway provision on the eastern side of the road is typically sub-standard and an improved footway on the western side of the High Street along this section would be considered beneficial. Appropriate dropped kerb / tactile crossings will need to be provided across this junction.

Existing visibility at the junction of Tai Owain with the High Street is limited in the northerly

direction providing a splay of approximately 2.4 x 12m measured to the nearside wheel track. The existing boundary wall impedes visibility at this junction. The extension of a 2m wide footway along this section would significantly improve visibility in this direction from this junction.

The LHA recommends the applicant indicates the above footway and junction visibility improvements on a revised layout plan.

The proposed dropped kerb / tactile pedestrian crossing points indicated on the submitted layout plan (Drg. No. 006 Rev H) across the High Street are considered acceptable.

Limited details of the undercroft access have been provided. The LHA typically recommend a maximum access gradient of 1:24 for the first 10m behind the adjoining highway then a maximum of 1:12 thereafter. No details of any footway links into the undercroft parking area have been indicated. Details of the proposed headroom through the undercroft access will need to be provided. It is assumed that WCBC Building Control Section will need to check such details in respect of access for emergency service vehicles. **The LHA recommends the applicant indicates the above details on a revised layout plan.**

- Cycle Parking / Storage

LPGN 16 require sufficient space to provide at least 2 secure cycle parking spaces per dwelling. In the case of flats, this should be provided via safe and secure communal cycle parking areas. This would require a minimum of 32 cycle spaces. Insufficient detail has been provided to demonstrate this provision. **The LHA recommends the applicant provides a revised layout plan indicating the details of the proposed cycle storage facilities ie/ stands, spacing of stands, secure covered storage with appropriate lighting.**

- Turning Provision – Delivery Vehicles

It is not clear how any delivery vehicles visiting the site will turn / drop off within the curtilage of the site. **The LHA recommend the applicant demonstrates how such vehicles will turn / drop off within the curtilage of the site on a suitably scaled plan when the proposed parking spaces are fully occupied.**

- Swept Path Details

Swept path details have been submitted which indicate the turning movements of an estate car parking / accessing the proposed spaces at the site.

The swept path details for the proposed 2 no. mobility spaces do not accurately show the kerbline / width along Tai Owain (both sides) which is only 3.1m wide. This detail is required. The swept paths show a car sweeping over the proposed hard standing area / internal footway which is unacceptable. **The LHA recommends the applicant addresses these issues and indicates this detail on a revised layout plan.**

The swept path details for the proposed 14 no. spaces in the undercroft parking area appear acceptable. However, as indicated above, it is not clear how any delivery vehicles visiting the site will turn / drop off within the curtilage of the site. **The LHA recommend the applicant demonstrates how such vehicles will enter (in both directions) / turn / drop off / exit (in both directions) within the curtilage of the site on a suitably scaled plan when the proposed parking spaces are fully occupied.**

- **Traffic Generation**

The submitted Transport Statement includes TRICs data for 11 no. sites with the following

characteristics:-

- Affordable flats
- Sites with 6 – 25 dwellings
- Date Range of surveys: 01/01/2003 – 07/10/2016
- Selected Locations:
  Suburban Area
  Edge of Town
  Neighbourhood Centre

The LHA request that privately owned flats are used in any TRICs submission.

TRICS survey data must be no more than 8 years old. **The submitted data exceeds this criteria.**

The LHA do not consider the site to be within a suburban or edge of town location so data is irrelevant. Either Neighbourhood Centre or Free-standing sites will need to be reviewed.

The LHA request that sites from Northern Ireland are not included in any revised TRICs analysis.



On behalf of Chief Officer, Environment & Technical

Supplementary Notes

The applicant's attention should be drawn to item nos. 1, 2, 3, 4 & 5 of the supplementary notes.

Appendix

Highways Development Control Standard Advisory Note

In the interests of maintaining highway safety, and to avoid obstruction of the public highway (in contravention of the Highways Act), The Applicant is advised to coordinate with the highway authority at highwayroadworks@wrexham.gov.uk in advance of commencement of the development/works with respect to:

1. *Skip, scaffolding, hoarding or A frame/signage (Permit required for these items, if on the public highway);*
2. *Use of a parking space for a set down/delivery area;*

3. *Record a dilapidation survey of the adjacent carriageway prior to commencement (to avoid being ask to repair damage by the Applicant whilst carrying out their works);*
4. *If any lane closure or obstruction of the highway is required for a crane or similar;*
5. *Protection against dust and debris blowing onto the public highway*
6. *Construction traffic parking locally avoiding nuisance to others;*
7. *If the Applicant's scope of work includes new apparatus in the highway, such as new mains services then a Section 50 licence will be required. Insurances and demonstration of competency to carry out works in the public highway will be required.*
8. *Lowering of kerbs or minor pavement alterations require Section 184 agreement. Insurances and demonstration of competency to carry out works in the public highway will be required.*
9. *A section 278 agreement works agreement is required for more significant alterations to the existing highway*
10. *Any temporary works affecting traffic lights, [pedestrian/cycle road crossings, or bus stops require pre-planning and permits;*
11. *For applications with a private driveway (either existing or proposed) connecting onto the public highway, the following conditions of approval apply:*

    - *No surface water from the applicants site should be allowed to drain onto the public highway,*
    - *The first 5m* minimum (for residential property) should be hard paved, avoiding gravel or loose chippings form spreading.*
    - *No gate should be built in a location where it would result in a car obstructing the highway whilst being unlocked, and it should not swing out and over a pavement or any other part of the highway.*

    **The hard paved length and set back if required is subject to the applicants proposed vehicular length*

The applicants should allow a minimum of 4 weeks' notice for any of the above standard requirements, and 6-8 weeks for lane closures & road closures (lead times may change without notice subject to workload and complexity). Any works involving Trunk roads should be coordinated separately and directly with the North & Mid Wales trunk Road Agency. For larger sites with a significant impact upon the highway, a Construction Traffic Management Plan will be required.