MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO::	Dafydd Thomas
Our Ref:	ET/DC/MZ/P/2024/1386	**Your Ref:**	P/2024/1386
Date:	27/05/2025		

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 12/05/2024 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

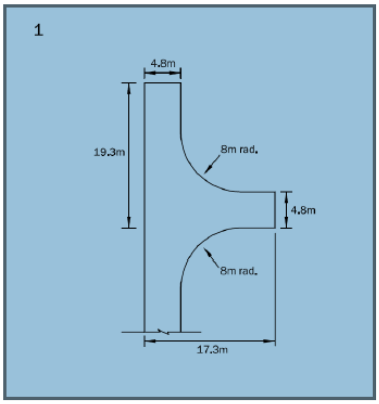
WCBC doesn't accept garages as available parking, it is noted that there are an extensive number proposed within the site which will not be counted towards the parking requirements, which results in the parking proposed across the majority of the units proposed falling below the standards. **A shortfall 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.**



Swept paths are shown on the submitted plan but no details of the vehicles used are shown and it is noted that two different sixed of vehicles are used and that in many locations these vehicles clip or overrun the footways / verges which is not acceptable on highway and pedestrian safety grounds.

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. **The applicant has not addressed this throughout the submission.**

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):

- Refuse vehicles are 11.2m long and will not reverse further than 12m. **Not shown in all areas.**
- A maximum distance of 15m for refuse operatives or residents to walk to move a bin. **Which has not been complied with across the site. Bin stores have been located in many visibility splays to the detriment of highway safety.**

Some swept paths have been provided for medium sized delivery vehicles (i.e vehicles approx 7.5 tonne) on private drives or shared surface areas, but not all, the applicant appears to have cherry picked what to demonstrate and what not to. Swept paths should be provided and demonstrated for different vehicles on separate plans. **The Swept paths provided are not clear and details of the vehicles has not been provided, many are overlaid and you cannot clearly see the movements, and many overrun footways and verges unacceptably. A swept path of a large car is required for the eastern end of the site where it is not considered there is adequate turning space for vehicles parking in the proposed parking spaces.**

Visibility splays are required to be demonstrated across the site at all private drive / courtyard access points and junctions, design speeds should be 20mph within the site and visibility splays of 2.4m x 25m demonstrated at all junctions and communal access points. **Not all have been undertaken.**

Residential Parking

The newly submitted plans have removed part of the site which is now greyed out and detailed as ‘future development’, no updated matrix has been provided in relation to the dwellings and parking provision. However the private dwellings proposed (106 total) feature 7 no 2 bedroom dwellings are proposed, 51 no 3 bedroom dwellings, 43 no 4 bedroom dwellings and 5 no 5 bedroom dwellings in addition 39 affordable dwellings are proposed, 17 2 bedroom dwellings and 11 no 1 bedroom flats.

- Cycle storage for bicycles serving the apartments is now shown but no details are provided of the type of store and spacing between the stands which should comply with WCBC’s LPGN16. To encourage sustainable travel at the site we recommend that cycle parking is provided here at the minimum rate of two per dwelling, and spaces should be provided in a secure / covered long stay arrangement. **No details of the number of spaces are provided for the flats. The proposed store for the apartments appears to block visibility to and from proposed car parking spaces that neighbour it.**

No schedule has been provided detailing the parking provision for each dwelling but it appears that the parking proposed falls under the WCBC maximum standards and therefore the proposals could cause some additional on-street parking within the vicinity of the site.

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. **No clarification has been made.**

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. A wide array of amendments are required, as the layout seems exceptionally tight. **Visibility splays of 2.4m x 25m are required from all access points. This has not been undertaken on the latest drawing**

Adequate pedestrian visibility is required from all driveways also. The LHA would recommend 2m x 2m which is the standard requirements of pedestrian visibility.

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. **This has not been complied with across the site.**

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 4.5m wide is proposed to access over 30 vehicle parking spaces and **therefore this should be increased in width and some of the localised bends removed to ensure access is available for emergency vehicles and delivery 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. **Bin collection points now seem to have been located haphazardly across the site often at junctions and accesses impeding visibility splays and without consideration for the standards set out previously that WCBC refuse vehicles will not reverse further than 12m and that the maximum distance for operatives and residents to walk is 15m.**

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. The newly designed arrangement for Plots 165 – 168 is a prime example of this and plots 85, removing the visitor parking space is preferable.

For the most part 6m aisle widths are now provided across the site, however, there remain a small number of units where access and egress for drivers will be very difficult due to tight arrangements,

swept paths for a large car should therefore be undertaken for Plots 220 and at the eastern end of the site within the car park. 6m aisle widths are required for plots 126, 120 and 127.

Private drive 9 has an inadequate turning head for service vehicles and the manoeuvring space appears inadequate for cars to turn which should be addressed.

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. Swept paths seem to be shown for a 9m long vehicle but the vehicle is shown driving over the footway in numerous places which isn't acceptable on highway safety grounds.**

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.

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 183 and 194). This has not changed in the latest iteration.**

Driveways should be located at 90 degrees to the footway/highway, oblique angles restrict visibility for drivers and can compromise pedestrian safety. There are numerous examples that remain where this hasn't been complied with.

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.

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 91-93 and 89 will find it very difficult to take a bike to their garden gate due to the alignment and narrow nature of the access path. 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 94, 95, 128, 129, 223, 164, 132, 133, 172, 176.

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

The highway design seems really bendy in places which will make it much more difficult for a large vehicle to pass a car, this should be reconsidered or it is likely that refuse and delivery vehicles will find it difficult to pass.

Pedestrian routing through the site should be considered carefully, south of play area 2 the footway ends abruptly, can dropped kerbs and tactile paving be installed to cross pedestrians safely across to the opposite side of the road where a footway is provided. Dropped kerbs and / or tactile paving should also be provided across junctions within the site to aid pedestrians crossing.

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.

The tactile paving shown at the junction with Eldon Grove is shown of an incorrect shape for uncontrolled crossings.

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