

MEMORANDUM



From:	Chief Officer, Environment & Technical	To:	Chief Officer Planning & Regulatory
		FAO:	Sharon Holman
Our Ref:	ET/DC/MZ/P/2023/0800 Rev C	Your Ref:	P/2023/0800
Date:	15 th January 2025		

Land At, Bangor Road, Johnstown, Wrexham.

Reserved matters pursuant to outline planning permission P/2020/0210, for a mixed use residential, business, industrial, storage and distribution and retail development (appearance, landscaping, layout and scale)

Further to the planning submission in respect of the above, we comment as follows:

The principle of access to the development and impact in the highway was established in the past planning applications P/2013/0545 and then amended subsequently in application P/2020/0210.

The comments provided in this note relate to the reserved matters in terms of the layout of the development including parking. It is noted that a highways adoption plan has been submitted indicating that much of the internal highway layout is intended for adoption excluding driveways and parking courtyard areas.

Site Access

The site access proposed appears to be in keeping with the arrangement agreed previously within application P/2020/0210 which is acceptable. This should be delivered through the mechanism of a Section 278 agreement.

Highway Layout

Vehicle tracking of all turning areas of a standard 11.2m refuse vehicle has been provided to indicate that refuse vehicles can safely turn within the site, however, the standard 12m fire tender (aerial platform / turntable ladder / special appliance) has not been used in the swept paths. Looking at the road layouts provided, they appear too tight in places to accommodate a 12m fire tender and the road alignments will need to be amended as a result. The applicant is requested to undertake the required swept paths. 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 a 12m fire tender can access through the site acceptably. Many of the turning heads shown fall short of the WCBC turning head standards shown below.

The Active Travel Act Guidance should provide priority for pedestrians, rather than for drivers, the proposed parking layouts seem to provide priority for drivers and cars rather than pedestrians, lowered kerbs should be used to access parking spaces, rather than footways ceasing before

stretches of parking commence and long lengths of dropped kerbs should be avoided as they give priority to drivers over pedestrians.

Swept paths have been submitted for refuse vehicle of 11.2m length. The current standards that WCBC work to (other than on unadopted roads):

- Refuse vehicles are 11.2m long and swept paths should be demonstrated within proposed highway layouts
- A refuse vehicle will not reverse further than 12m
- A maximum distance of 15m for refuse operatives or residents to walk to move a bin

There are concerns that should there be vehicles parked on street (which invariably there will be) in certain locations within the proposals, the bin wagon will not be able to pass and therefore localised widening should be undertaken to ensure a bin wagon / fire tender can pass a parked car at all points within the site.

Consideration should also be given to turning facilities for medium sized delivery vehicles (i.e vehicles approx 7m long) on private drives or shared surface areas. This has not been provided or clarified and some of the proposed shared drives are of a considerable distance of approximately 45m length. The applicant states that these are not commonly provided for delivery vehicles, but the LHA cannot condone obstruction of accesses or turning heads.

The site layout plan is incredibly difficult to review due to the 1:1000 scale, drawings with scales no larger than 1:500 should be provided in future.

Wrexham County Borough Council require the provision of a second vehicular access point when any areas proposed to serve more than 150 homes. It is understood that the applicant previously indicated that there would be an emergency vehicular access from Hafod Road at the northern site boundary. On the current plan a 5m area has been shown to the east with a series of what are assumed to be lockable or collapsible bollards. But the LHA will need more details of how this ties into the existing highway, visibility splays will be required to ensure access and egress is acceptable onto Hafod Road. The applicant details an emergency vehicle accessing and egressing, but should there be a gas leak and a total road closure of the proposed access road, ALL site traffic would need to access and egress via this point, including pedestrians and a suitable design should be submitted that is fit for purpose should this result.

Condition 30 iii) of the previous approval also asked for a cycleway /footway along the full frontage of the site on Bangor Road and Hafod Road which needs to be shown on these plans, this is not shown and needs to be clarified.

Shared surface areas with approximately 45m length are an excessive distance to wheel bins, according to WCBC standards nothing further than 30m is permissible, due to the 15m maximum distance for operatives and a 15m distance for residents to move a bin. The applicant should review these issues.

The adoptable highway extents submitted by the applicant were reviewed and the LHA would not wish to adopt the full access road to the office and retail unit, especially seeing as there were no adoptable turning head arrangements proposed. An updated plan and arrangement have been provided with a turning head. However, the proposed junction arrangements are not acceptable, there is some odd hatching proposed which isn't desirable. The swept paths of large vehicles servicing the site are shown driving through the hatching. It is preferable to provide dropped kerbs and tactile paving across this junction also which isn't shown. The applicant is requested to amend this arrangement.

Public Rights of Way and Emergency Access

The transport assessment which accompanied the original planning application set out the following active travel connections with the wider transport network. A drawing has represented how these fit

within the proposed layout. The 'P' numbers referred to below relate to Figure 3 included in the Transport Assessment for Application P2013/0545

- P2. Pedestrian and cycle connection (3m cycleway) connection to junction of Bangor Road and Hafod Road. No connection shown here.
- P3: Pedestrian Connection to east of site with Hafod Road at junction with Hafod House Farm PROW ESC 31. Plan indicates as an annotation 'new pedestrian / cycleway link route' but it doesn't align with the existing PROW and it is unclear how pedestrians will access the route as the plans do not show a pedestrian and cycle connection (3m cycleway) on the Hafod Road frontage.
- P4: Pedestrian connection from Hafod Road at the northern site boundary incorporating PROW ESC 28. The submitted plan indicates diverted PROW route, whilst the LHA have no issues with this, the applicant should liaise with WCBC's PROW officer regarding this amendment.
- P5 pedestrian connection to west of site at intersection of PROW ESC 24 & ESC 28
- P6 Connection at PROW RUA 177
- P7 Pedestrian connection at western boundary of the site at Bangor Road connecting to PROW RUA 117.

The applicant should provide information on how the above connections and emergency access point is to be provided and how this ties into the public highway incorporating new pedestrian/cycle way on the Hafod Road and Bangor Road frontages as approved in the outline planning application.

The applicant should liaise with Wrexham's' Public Right of Way officer Sean Hanratty on how existing PROWs within the site are to be maintained / diverted.

The applicant should also liaise with Wrexham's Active Travel Lead, Ms Gwen Thomas available at gwen.thomas@wrexham.gov.uk to agree proposals in keeping with current standards, updated since the outline applications.

Car and Cycle Parking

Commercial Use Parking

The submitted plans provide the following information:

- 235m² retail convenience store space and 465m² B1 use proposed.
- 5 cycle stands for the B1 use and the same for retail use (10 cycle capacity at each) and 4 stands (8 cycle capacity) in the staff parking area.
- 37 car parking spaces including 5 accessible spaces for the B1 and retail units and within the staff parking area.

It should be noted that we understand that the site benefits from B2/B8 consent. However the plans are labelled 'office'. Can clarification be provided if B1 use is proposed to be carried forward as there is likely to be increased parking requirements as shown below.

For these uses the following parking standards apply according to LPGN16.

- Retail (small shop) 1 car parking space per 15m² (max) and 1 cycle parking space per 150m² (min)
- B2 1 car parking space per 50m² (max) and 1 cycle parking space per 500m² (min)
- B8 1 car parking space per 100m² (max) and 1 cycle parking space per 1,000m² (min)
- B1 1 car parking space per 30 m² (max) and 1 cycle parking space per 300m² (min)

On this basis the standards would require a maximum of:

- Retail – 16 car parking spaces and 2 cycle spaces
- Office - Up to 16 car parking spaces and 2 cycle spaces

The proposed 20 cycle stands is more than the developer needs to provide for B1 use, however the cycle parking standards are minimum standards, this is accepted to encourage sustainable travel to the site. Some secure (covered and within a secure compound) parking should be provided for staff, it is noted that a staff parking area is proposed which includes 4 no covered horizontal cycle stands, whilst this is acceptable in principle access to this space looks limited and would require reconfiguring to ensure access and egress can be made.

The provision of 37 car parking spaces is more than is required in the car parking standards, however this is accepted to avoid vehicles attempting to park on the highway, either on Bangor Road or within the development site should at peak times the car park become full. It would be expected that the convenience store could attract significant pass-by trips by car. It is noted that there is an existing recreational demand for parking accessing the footpaths, and the additional 10 spaces could help reduce the impact of this demand.

A car parking and servicing management plan should be provided setting out details how parking for the retail use may be separated from that proposed for the other use.

A swept path has been provided for a HG Rigid Vehicle of 10m length, this vehicle is smaller than the standard 12m fire tender, therefore the LHA requests that swept paths are provided for this vehicle, the service management strategy would need to set out that the maximum size of vehicle to service the site should be a 10m rigid to ensure larger vehicles do not attempt to service the site.

The cycle parking for the office is noted as covered but needs to be located within a secure compound.

It is noted that there is a route from the car park aisle to link into existing PROW ESC/29 the LHA would request that this is tied into the footway provided and isn't taken from the car park aisle for pedestrian and cycle safety grounds. Details of the proposed surfacing materials should be provided and it would be useful to agree this with the WCBC PROW officer.

Residential Parking

The submitted plans provide the following information:

- 255 Houses (15 affordable) and 45 apartments (all affordable) - 300 dwellings in total
- Approximately 553 car parking spaces
- Cycle storage for bicycles serving the apartments is below standard. To encourage sustainable travel at the site we recommend that cycle parking is provided here at the minimum rate of two per dwelling. In addition, the type of stores were not acceptable as they're not accessible for all, and don't work for those who have mud guards on their bikes as the full weight of the bike rests on the back tyre. The submitted plan is of an insufficient scale and detail for the LHA to review the cycle parking, the surfacing detail has obscured all the details on the submitted plan.

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

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
4	18	3 per dwelling	2 per dwelling	Provision below maximum standard
3	159	3 per dwelling	2 per dwelling	Provision below maximum standard
2	78	2 per dwelling	1 or 2 per dwelling	Provision below maximum standard
Apartments				
Beds	Dwellings	Maximum CP Standard Calculated	Spaces Provided	Comment
1	30	45	It appears that 1 car parking space is provided per flat with a couple of visitor spaces provided at three of the blocks	Provision below maximum standard
2	15	30	It appears that 1 car parking space is provided per flat with a couple of visitor spaces provided at three of the blocks	Provision below maximum standard

The main element of the development where parking is below maximum standard is the 159 x 3 bedroom dwellings and 18 x 4 bedroom dwellings with 2 parking spaces where a maximum of 3 could be provided. 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 could further reduce the availability of on-street parking to accommodate visitors or overflow parking. In this particular location, the LHA is concerned regarding the proposed level of car parking. Details have been provided regarding the local MSOA figures, but 2021 figures have been used which were affected by Covid-19. The 2011 data is more robust. It is also noted in the 2021 data detailed that 43.5% of residents in this area have 2 or 3+ cars and therefore, bearing in mind the swept paths provided for refuse vehicles, any overflow and on-street parking could result in obstruction to refuse vehicles or emergency vehicles due to the tightness of the submitted layout. The LHA would request that the applicant revisits the layout and increases the level of car parking for 3 and 4 bed units to ensure that these issues do not result.

Layout Issues

Long lengths of parking spaces are noted within the site which will undermine pedestrian safety and will remove frontage parking for visitors and any overflow that would be needed due to the levels of car parking provided across the site.

The LHA is unable to make detailed comments on the plan and layout due to the scale of 1:1000 and as some of the text relating to elements of the design aren't clear due to the shading of proposed paving.

The LHA is concerned regarding the proposals for the secondary emergency access, the access route provides no clear and safe exit route for pedestrians that is segregated. The route should tie into a 3m shared cycleway / footway on the frontage of Hafod Road, this needs to be shown within the plans.

Swept paths have been provided for a 7.5t panel van accessing and egressing the mast site which is acceptable.

There are concerns over the alignment of some driveways within the site, visibility is restricted where driveways are not located at 90 degrees to the kerbline, driveways such as 224, 219, 215 are not acceptable due to this.

Parking for unit 153 is not acceptable as it could result in drivers having to reverse an extensive distance onto the public highway.

There are also a number of narrowings or driveways that impede the footway that need to be addressed such as the driveways for plots 83 and 84, where the crossover shows a narrowing, the turning head needs to be enlarged and the splays should be in the opposite direction. Plots 153 and 170 also need to have their parking arrangements amended so that they don't reverse over the footway.

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

Conditions and requests on the outline permission

In accordance with the previous Decision Notice, ESC P/2020/0210 we note the following conditions relating to highways matters that should be considered for inclusion within any future approval:

- Prior to commencement of any works, a Construction Traffic Management Plan should be submitted for approval covering both the demolition and construction phase. We refer to Condition 17 of the decision notice
- We note that Street Lighting should also be provided to discharge condition 24 on the same application.
- Conditions 30 & 31 refers to details of junction works, Stage 1/2 Road Safety Audit, Bangor Road speed limit amendments.
- A Travel Plan all prior to first use including provisions for the pump priming of the local bus services to ensure the site is adequately served by public transport.
- Bus stop, bus kerbs and bus routes should be detailed within the reserved matters, and developer contributions towards diversion of a bus service into the site. No details have been provided.
- Cycleway enhancements through Nant Parc Estate with links to Johnstown School. No details have been provided.
- Condition 32 refers to new priority controlled junction access to the site

Summary

The following additional information and clarifications are requested from the Applicant, for more detail please review the note in its entirety:

- Vehicle tracking of all turning areas should be provided to indicate that a 12m sized fire tender can access and safely turn within the site.
- Amendments are required to the access arrangement to the retail and B1 units.
- Amendments are required to the link to the PROW from the B1 / retail units, needs to be from the footway for pedestrians rather than the car park aisle.
- Several shared drives are an excessive distance to wheel bins. The applicant should review this issue and other proposed shared surface / private drives within the site to comply with the WCBC standards previously quoted.

- Active Travel connections to the external network should be clarified, the Welsh Active Travel Act Guidance has been introduced since the outline permission was granted.
 - The secondary access / emergency access requires further clarification, this should link into a 3m cycleway/footway on the Hafod Road frontage, the applicant is also required to provide a shared 3m cycleway/footway on the Bangor Road frontage. The applicant should provide amended information to this end.
 - The applicant should liaise with Wrexham's' Public Right of Way officer on how existing PROWs within the site are to be diverted.
 - Amendments are required to the staff cycle parking shown for the retail use.
 - Residential quantum of car parking is below the standards and there are concerns that this will lead to further parking on-street, this is compounded by long lengths of parking which remove available on-street parking, there are also concerns that on-street parking with the current geometry could block access to refuse vehicles and emergency vehicles.
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- Cycle parking within the apartment blocks cannot be assessed due to the poor quality of the submitted plans. To encourage sustainable travel at the site we recommend that cycle parking is provided here at the minimum rate of two per dwelling.
 - A CTMP should be provided and approved prior to commencement of works
 - A number of amendments detailed in the body of these comments need to be addressed.

Conclusion

The Applicant should provide the additional information and respond as requested above.



On behalf of Chief Officer, Environment & Technical