

MEMORANDUM



From:	Chief Officer, Environment & Technical	To:	Chief Officer Planning & Regulatory
		FAO:	Sharon Holman
Our Ref:	ET/DC/MZ/P/2023/0800 Rev D	Your Ref:	P/2023/0800
Date:	29th May 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. Looking at the road layouts provided, they appear too tight in places and the road alignments will need to be amended as a result. 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. Many of the turning heads shown seem to fall short of the WCBC turning head standards.

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, 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 on bends should be undertaken to ensure a bin wagon 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. Swept paths have not been provided with the updated amended plans.

On the current plan a 5m area has been shown to the east of the site for an emergency access with a series of 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. 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. What arrangements are needed at this location to raise awareness to cyclists and pedestrians that this could be used as a vehicular access point. A road safety audit should be provided to assess the suitability of the proposed design.

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 now shown on the updated plan.

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 are some odd markings proposed which don't comply with a standard give way arrangement as shown in the Traffic Signs Regulations & General Directions. 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 shows new pedestrian / cycleway link route along 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 three areas of covered cycle parking are shown but it is unclear if these are secure ie in a lockable compound. A combination of short stay and long stay parking provision should be made for the retail use.

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 11.2m refuse vehicle, 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 linking into the existing PROW ESC/29 the LHA would request that 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 - 300 dwellings in total.
- Approximately 556 car parking spaces except the spaces for the office and retail use.
- Cycle storage for bicycles serving the apartments is shown but it is not clear what type the infrastructure is or how much accommodation is provided. To encourage sustainable travel at the site we recommend that cycle parking is provided here at the minimum rate of two per dwelling.

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 previously of the parking provision dwelling by dwelling using the plans provided and it appears that the level of parking provided is below the maximum standards. 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 concerned regarding the proposals for the secondary emergency access, the access route provides no clear and safe exit route for vehicles and pedestrians that is segregated. Further detail is required to demonstrate how this will work should it be required.

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 69, 71, 2, 3, 4, 219, 215, are not acceptable due to this.

The road network and private driveways have been changed in places within this iteration and therefore updated swept paths for an 11.2m refuse vehicle are required. Some of the access arrangements don't comply with the refuse standards set out previously due to the length of the private drives and the distance from a turning head of adoptable standards.

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.

Parking spaces for plot 228 and 225 have restricted visibility due to the building line of the property.

The LHA is concerned that it is not clear that the parking spaces for Plot 218 are designated for that dwelling due to their location at the end of the cul de sac.

The driveway / parking to Plot 190 blocks the visibility from the access road for parking for plots 186-189. Parking for Plot 70 and Plot 10 appears to impede visibility from the private drive next to it.

Dropped kerbs and/or tactile paving for pedestrian accessibility should be provided across the site.

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 11.2m refuse vehicle can access and safely turn within the site.
- Amendments are required to the access arrangement to the retail and B1 units.
- 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 which is now shown on the plan in an

indicative form, 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 and clarification is required in relation to the cycle parking stores proposed.
- 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, localised widening is needed where bends in the roads/ private drives are proposed.
- Cycle parking within the apartment blocks cannot be assessed due to the lack of detail on 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 in a secure lockable and covered compound to comply with the standards set out in LPGN16.
- 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.

A handwritten signature in black ink, appearing to be 'J. Jones' or similar, written in a cursive style.

On behalf of Chief Officer, Environment & Technical