

MEMORANDUM

From:	Chief Officer, Environment & Technical	To:	Chief Officer Planning & Regulatory
		FAO:	Sharon Holman
Our Ref:	ET/DC/MZ/P/2023/0800	Your Ref:	P/2023/0800
Date:	6th September 2024		

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)

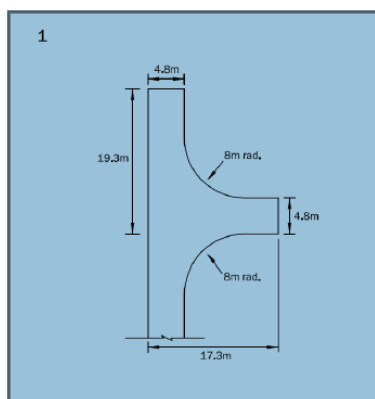
Further to the planning submission in respect of the above, we comment as follows:

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 P2020/0210.

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.

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 refuse vehicles can turn safely without the use of unadopted land. Many of the turning heads shown fall short of the WCBC turning head standards shown below.



The linework shown on the proposed site layout drawing No GL/BR/PSL/01 is misleading and it is unclear whether some lines indicate footways, centre lines or other demarcations. An updated drawing is requested that clearly outlines footways, service strips or carriageway extents.

Furthermore, 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.

Swept paths have been submitted for an undersized refuse vehicle of just 10.595m 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

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.

The swept path submitted indicate the undersized refuse vehicle swinging over the proposed footways which are not acceptable on pedestrian safety grounds in numerous locations including in front of units 269/270, 254/255, 168, 11, 224/223. The plans are also incredibly difficult to view due to multiple layers of vehicles movements being shown simultaneously, the LHA would request that it would be beneficial to submit a clearer drawing 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, but the proposed access shown is just 5m wide, which while this will allow simultaneous access and egress, might need to be widened on the bend in the road to enable vehicles to pass. Further information is required to demonstrate how this will link into Hafod Road. It is indicated that there will be two rows of collapsible bollards in place at this point.

Two shared surface areas towards the west of the site are 50 and 55m long respectively which is an excessive distance to wheel bins, and a number of other shared surface / private drives where similar issues might result from the distances to where refuse would be collected. The applicant should review these issues.

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.

The adoptable highway extents submitted by the applicant have been reviewed and the LHA would not wish to adopt the full access road to the office and retail unit, especially seeing as there are no adoptable turning head arrangement proposed.

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. It is not clear how these are represented in the proposed layout. In particular the following connections appear to be omitted or require further clarification. 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. No connection shown here.

- P4: Pedestrian connection and emergency vehicular access from Hafod Road at the northern site boundary incorporating PROW ESC 28. No means of pedestrian or vehicular access is shown in proposed plans at this location.
- 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. No connection shown here.

The applicant should provide information on how the above connections and emergency access point is to be provided as approved in the outline planning application. The applicant should liaise with Wrexham's Public Right of Way officer 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)
- 35 car parking spaces including 4 accessible spaces for the B1 and retail units.

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 space

The proposed 20 cycle stands is more than the developer needs to provide for B2/B8 use, however the cycle parking standards are minimum standards, this is accepted to encourage sustainable travel to the site. The provision of 35 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.

Some secure covered long stay parking for staff should be provided, the provision should not be vertical stands.

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.

Furthermore, whilst a swept path has been demonstrated for a refuse vehicle, the vehicles intending

to service the retail unit could be larger and therefore clarification and swept path of a standard foodstore delivery vehicle is requested if this is likely to be larger than the 10.595m length vehicle used within the swept paths. Furthermore, a clearer swept path is requested for service vehicles accessing the retail unit, the plans submitted shows multiple vehicles overlaid and it's difficult to ascertain the paths submitted, there is a concern that the delivery vehicle will need to travel across both lanes of traffic to access the service yard, which is not acceptable on highway safety grounds.

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 are 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.

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.

Layout Issues

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 at 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.

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 shortfall in car parking standards across the site.

Priority needs to be with pedestrians, much of the site layout plan indicates vehicle accesses kerbed out, they need to be simply dropped kerbs.

In many private drives provided there are not 6m aisle widths provided behind the proposed driveways / car parking spaces. These need to be provided or parking spaces widened to allow turning within the car parking space, if this methodology is employed swept paths for a large car are required.

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 and in addition to this the connection of the route to the turning head isn't straight forward and it is proposed over block paving, which is only appropriate for lightly trafficked routes.

No details have been provided in regards to the mast within the site, will it require servicing, what size of vehicles will service and can they be accommodated on the highway network.

The driveways for units 224 are not acceptable due to their location on the bend, visibility will be restricted by the building of plot 224.

The driveway for plot 225 is not acceptable, cars can't bend in the middle, the driveway location would result in cars not simply crossing the dropped kerb but will result in reversing back across extensive lengths of footway which is not acceptable on pedestrian safety grounds

The driveway arrangement for plot 228 is not acceptable as it could result in drivers haven't to reverse extensively into the turning head past two other drives.

There is concern that the building line for plots such as 230 and 229 would restrict visibility for drivers egressing from the side driveways.

Driveway 87 is not acceptable due to its location at the junction, the building will block forward visibility.

Clarification is required for some barrier / vehicle restrictive measure between plots 78 and 79, and 5 and 6.

There are concerns over the alignment of many driveways within the site, visibility is restricted where driveways are not located at 90 degrees to the kerblines, driveways such as 158, 159 and 185 are not acceptable due to this.

There is inadequate circulation space for plots 34 and 35, they need to be able to exit in forward gear.

Alignment of private driveways from turning heads needs to be considered more carefully to ensure that footway safety is not compromised, ie near to plot 32 and elsewhere within the site.

Further details of service strips and street lighting will be required, 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 WCBC standard sized 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 maneuvers. The applicant should demonstrate compliance with Wrexham's standards and that refuse vehicles can turn safely without the use of unadopted land.
- Swept paths are required for the retail use and the applicant must ensure that vehicles do not have to straddle the exit and access lanes on approach to the servicing area.
- Two shared surface areas towards the west of the site are 50 and 55m long respectively which is 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 WCBC standards.
- Can adequate visibility splays be delivered across the site, these need to be demonstrated
- 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 does not appear fit for purpose. 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 maintained / diverted.
- Clarification over the office / industrial use is required to ensure adequate infrastructure is in place for the use.
- Residential quantum of car parking is below 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, courtyard parking and also the location of some of the parking spaces which in some cases is remote from the dwelling, which could result in residents parking on street in front of their dwelling.

- Cycle parking within the apartment blocks 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. Cycle stores are not acceptable as proposed, they need to be accessible for all. Vertical stands are not acceptable.
- A CTMP should be provided and approved prior to commencement of works
- A raft of amendments detailed in the body of these comments and clarity over the highway alignment, where service strips and footways are located, the plan isn't very clear to this end.

Conclusion

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

A handwritten signature in black ink, appearing to be a stylized name or set of initials.

On behalf of Chief Officer, Environment & Technical