

	Highways Consultation Comments dated 6th September 2024	Applicants Response
	Highway Layout	
1	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 Site masterplan has been amended to provide turning provision in line with Wrexham's standards. The turning heads have been tracked for an 11.2m refuse vehicle, and demonstrate that the vehicles are able to turn within the adopted highway. The swept path analysis is shown on Drg No 1232/SP/02/B
2	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.	The site layout has been tidied up and any misleading lines / text emanating from the topographical survey have been removed. Line thicknesses have also been improved to provide visual clarity. The grey fill to the roadway and footpaths have been removed to provide clarity and road centreline lightened. Driveway curves also removed from footpaths.
3	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.	The Site masterplan has been amended to remove any misleading lines – parking spaces will be accessed via. lowered kerbs to give priority to pedestrians rather than drivers at private driveways.
4	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.	The Site masterplan has been amended to provide turning provision in line with Wrexham's standards. The turning heads have been tracked for an 11.2m refuse vehicle, as requested, and demonstrate that the vehicle is able to turn within the adopted highway. The vehicle does not encroach on footways. The swept path analysis is shown on Drg No 1232/SP/02/B Turning provision within private driveways is not commonly provided for delivery vehicles. Delivery vehicles will service the private driveways from the highway or have the opportunity to reverse into the private driveway for servicing. Bin collection areas have been shown to all private shared driveways.
5	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.	Access was approved as part of the outline planning consent with all vehicular access to be served by a single access on Bangor Road. An emergency access was indicated to Hafod Road. The Site masterplan shows these arrangements. However, the emergency access on Hafod Road has been relocated further south following comments received from WC. The emergency access is now located at the end of a straight road in the vicinity of a turning head. The emergency access measures 5m wide and will provide sufficient width for emergency vehicles to access/egress the Site in the event of an emergency. Swept path analysis for a fire appliance is presented on Drg No 1232/SP/03A. Simultaneous access is a very unlikely occurrence for an emergency access. Emergency accesses are typically provided to a width of 3.7m and the proposed link exceeds those requirements.
6	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.	The layout has been updated to include bin collection areas for all private shared driveways.
7	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.	Drg No 1232/23A shows the provision of 2.4m x 25m visibility splays at all access points on the site layout.
8	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.	A turning head has been incorporated into the access road to the A1 and B1 use class. Amendments have also been made to the junction to aid vehicular manoeuvrability.
	Public Rights of Way and Emergency Access	

10	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 pedestrian and cycle connections are now shown on the layout. In addition, a separate Site Connectivity Layout has been prepared to show the wider connectivity with the PROW network.
	Car and Cycle Parking	
	Commercial Use Parking	
13	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 layout has been amended to clarify the proposed uses. 16 parking spaces have been provided for the B1 office use with cycle parking. 16 parking spaces have been provided for the A1 retail use with cycle parking (plus 5 staff parking spaces)
14	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.	The proposed cycle stands have been amended as shown on the planning layout. Horizontal cycle stands have been provided for staff of the A1 retail use as requested.
15	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.	The retail parking area and office parking areas have been split to differentiate the different uses. It is suggested that a car parking and servicing management plan can be conditioned if required.
16	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	The site masterplan has been amended to show a wider access to allow for simultaneous entry and exit movements at the access. The delivery vehicle and refuse vehicle are shown to be able to enter the commercial access road whilst a vehicle waits.

	vehicle will need to travel across both lanes of traffic to access the service yard, which is not acceptable on highway safety grounds.	Swept path analysis has been undertaken for a refuse vehicle and delivery vehicle at the proposed retail store. The swept path analysis is shown on Drg Nos 1232/SP/04A And 1232/SP/05A.																																																							
	Residential Parking																																																								
18	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.	It is noted that the parking provision referred to are maximum parking standards. This is most relevant for 3 and 4 bed properties where a “<i>maximum of 3 spaces could be provided</i>” It is relevant to consider the potential car ownership at the site. The 2021 Census data confirms the number of bedrooms in properties in Wrexham 014. The data is presented below and compared with the Site: <table><tr><th>No of Beds</th><th>Wrexham 014 (%)</th><th>Site (%)</th></tr><tr><td>1</td><td>5.7</td><td>10.0</td></tr><tr><td>2</td><td>27.0</td><td>31.0</td></tr><tr><td>3</td><td>54.8</td><td>53.0</td></tr><tr><td>4+</td><td>12.5</td><td>6.0</td></tr></table> Review of the above confirms that there is broad similarity between Wrexham 014 MSOA and the Site. The proportion of 4 bed properties is lower on the development Site when compared with Wrexham 014. There are a greater proportion of 1 bed properties on Site compared with Wrexham 014 MSOA. The proportion of 3 bed properties is comparable. This provides a reasonable basis for comparing potential car ownership in Wrexham 014 MSOA with the Site. The 2021 Census data is reviewed to provide a view of car ownership for Wrexham 014 Middle Super Output Area (MSOA). This MSOA is where the Site is located and also includes a large residential area of Johnstown to the west of the Site. Review of the data confirms the following: <table><tr><th>No of Car</th><th>Wrexham 014 %</th><th>Wrexham %</th></tr><tr><td>0</td><td>14.1</td><td>19.1</td></tr><tr><td>1</td><td>42.4</td><td>40.6</td></tr><tr><td>2</td><td>31.3</td><td>29.2</td></tr><tr><td>3+</td><td>12.2</td><td>11.2</td></tr></table> The 2021 Census data establishes that 56.5% of households in Wrexham 014 either have access to no car or van or a single vehicle. This compares with 59.7% for Wrexham as a whole as is shown to be broadly comparable. The data confirms that just over 40% of Wrexham 014 households have access to only a single vehicle. The data shows that only 12.2% of Wrexham 014 households have 3 or more cars. The 2021 Census dataset is used to review the proposed parking provision for the Site. The proposed development comprises 300 dwellings. Application of the 2021 Census derived car ownership percentages for Wrexham 014 provides an indication of the potential car ownership at the Site: <table><tr><th>No of Car</th><th>Wrexham 014 %</th><th>No of Houses</th><th>No of Cars</th></tr><tr><td>0</td><td>14.1</td><td>42</td><td>0</td></tr><tr><td>1</td><td>42.4</td><td>127</td><td>127</td></tr><tr><td>2</td><td>31.3</td><td>94</td><td>188</td></tr><tr><td>3+</td><td>12.2</td><td>37</td><td>111</td></tr><tr><td></td><td></td><td>Total</td><td>426</td></tr></table>		No of Beds	Wrexham 014 (%)	Site (%)	1	5.7	10.0	2	27.0	31.0	3	54.8	53.0	4+	12.5	6.0	No of Car	Wrexham 014 %	Wrexham %	0	14.1	19.1	1	42.4	40.6	2	31.3	29.2	3+	12.2	11.2	No of Car	Wrexham 014 %	No of Houses	No of Cars	0	14.1	42	0	1	42.4	127	127	2	31.3	94	188	3+	12.2	37	111			Total	426
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		The application of the recorded 2021 Census data to the proposed development demonstrates that total car ownership for the 300 houses could be in the region of 426 vehicles. A further review of the 2021 Census has been undertaken for Wrexham 014. The 2021 Census recorded 2,679 households and a total of 3,915 cars within Wrexham 014 MSOA. This equates to an average of 1.46 cars per household. Application of 1.46 cars per household to the proposed 300 dwellings would equate to approximately 438 cars owned on site. Adopting either methodology presented above, there could be approximately 426 to 438 cars owned on the Site. The proposed Site masterplan shows a total provision of 559 off-road parking spaces across the development. Based on the above analysis, it is concluded that the off-road parking provision is suitable for the proposed development and that application of maximum parking standards would not seem reasonable.
	Layout Issues	
20	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.	The rear parking courtyard has now been designed out. This has allowed the building line to be concurrent with adjacent buildings and provided better accessibility from parking spaces to the principal access.
21	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.	The Census data analysis presented on an earlier point highlight that car ownership on the Site could be approximately 426 to 438 cars. The proposed development provides a total of 559 off-road parking spaces. This far exceeds the potential car ownership. It is unlikely that there will be a requirement for large numbers of on-road parking at the Site.
22	Priority needs to be with pedestrians, much of the site layout plan indicates vehicle accesses kerbed out, they need to be simply dropped kerbs.	The Site masterplan has been amended to show lowered kerbs to give priority to pedestrians rather than drivers at private driveways.
23	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.	All private drives have been reviewed and re-designed where necessary to allow for 6m reversing space behind all parking spaces.
24	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.	The Site masterplan shows the revised emergency access arrangements. The emergency access on Hafod Road has been relocated further south following comments received from WC. The emergency access will also function as a potential pedestrian/cycle connection to Hafod Road. The connection to Hafod Road measures 5m wide. Emergency access points commonly also function as pedestrian/cycle connections. There is no requirement for segregation in this location.
25	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.	Access to the mast lease area has been provided in the form of a bellmouth to provide the opportunity for a suitably sized turning head and parking to be provided within the mast lease area (to be provided by the mast operators should they wish to do so). Drg No 1232/SP/06A shows the servicing of the Site by a large panel van. The vehicle can enter and exit the access to the mast lease area in forward gear.
26	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 driveways serving plot 224 have been moved to a more visible location away from the bend
27	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 spaces have been moved to run alongside the property in a more accessible manner
28	The driveway arrangement for plot 228 is no acceptable as it could result in drivers haven't to reverse extensively into the turning head past two other drives.	The driveway has been re-designed and a turning space has been incorporated to allow shorter reverse distances for 228 spaces to a turn.

29	There is concern that the building line for plots such as 230 and 229 would restrict visibility for drivers egressing from the side driveways.	Plots 229 & 230 footprints have been moved back from the pavement frontage to allow better visibility from the side driveways
30	Driveway 87 is not acceptable due to its location at the junction, the building will block forward visibility.	Plot 87 's parking has been moved away from the junction.
31	Clarification is required for some barrier / vehicle restrictive measure between plots 78 and 79, and 5 and 6.	Fixed bollards have been indicated to prevent vehicles from crossing between the split driveways.
32	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 kerbline, driveways such as 158,159 and 185 are not acceptable due to this.	All parking to these plots have been amended to be 90 degrees to the roadway.
33	There is inadequate circulation space for plots 34 and 35, they need to be able to exit in forward gear.	The driveway serving these spaces has been redesigned to allow adequate turning space
34	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.	Each scenario has been reviewed and design improvements made, where possible.
35	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 street lighting design will be submitted in due course to discharge planning conditions.
	Conditions and requests on the outline permission	
36	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	Noted, condition 17 requires a Construction Method Statement to be submitted prior to commencement. This will be submitted in due course to discharge the planning condition.
37	We note that Street Lighting should also be provided to discharge condition 24 on the same application.	Noted, condition 24 requires a street lighting design to be submitted prior to occupation – this will be submitted in due course to discharge this planning condition.
38	Conditions 30 & 31 refers to details of junction works, Stage 1/2 Road Safety Audit, Bangor Road speed limit amendments.	Noted, condition 30 requires a scheme to be submitted prior to commencement – this will be submitted in due course to discharge this planning condition.
39	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.	Noted, condition 31 requires a travel plan to be provided for each phase prior to occupation. This information will be submitted in due course.
40	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.	We are not aware of this requirement – can you please clarify?
41	Cycleway enhancements through Nant Parc Estate with links to Johnstown School. No details have been provided.	We are not aware of this requirement – can you please clarify?
42	Condition 32 refers to new priority controlled junction access to the site	Noted. This information will be submitted in due course (prior to first use).