

MEMORANDUM

From:	Chief Officer, Environment & Technical	To:	Chief Officer Planning & Regulatory
		FAO:	Sarah Hill
Our Ref:	ET/DC/DB/P/2023/0611 rev 5	Your Ref:	P/2023/0611
Date:	14 th Feb 2025		

TOWN AND COUNTRY PLANNING ACT 1990

ADEILADU 3 ANNEDD / ERECTION OF 3 DWELLINGS. LAND AT RAILWAY TAVERN RAILWAY ROAD BRYMBO WREXHAM

Grid Ref: E 329627.3 N 353856.11

I refer to your consultation / email dated 11/02/25 in respect of the above, and subsequent consultations.

Following further review/internal consultation, we advise as follows:

The concerns relating to refuse collection points are resolved.
Omission of railings and the extended footpath along the frontage of the site is accepted and will require a Section 278/38 agreement for implementation prior to construction.

Car parking numbers: The floorspace of the public house is approximately 170 sqm, on the basis of the parking standard within LPGN16 for public houses. The provision of 42 car parking spaces could be made, noting that this is a maximum parking standard. The proposals include 10 parking spaces for the public house use which are located at the opposite end of the site to the public house some distance away from the entrance to the public house. Given the standards are maximum provision, and there are numerous public houses in similar settings with 10 or less car parking spaces, this number is acceptable on balance.

LPGN16 also states that for A3 use there will need to be short stay parking on site or within a short distance of the premises. It would be beneficial if provision for a moped as well as cycle parking were to be made, perhaps to the rear of the side terrace area. There is currently space for mopeds in the car park area, which would be lost with the construction of the dwellings and creation of the shared access.

Car Parking layout: There is a concern that the parking proposals do not accord with the requirements set out in LPGN16, that would require at least 1 mobility space of dimensions 2.4m x 4.8m with a 1.2m shared aisle to be provided. Should the applicant alter one of the existing car parking spaces allocated for the pub use it is considered that these spaces are an extensive distance from the entrance to the pub which isn't ideal but is not a reason for refusal. Inclusive Mobility (2021) states that 'Ideally, designated accessible spaces should be located adjacent, or as close as possible, to the entrance to the facility they serve'.

Furthermore, there are issues with the proposed car park layout due to the narrow nature of the space available when passing parking space number 1. Just 3.7m width is provided which does not allow two cars to pass each other, Manual For Streets details that a minimum of 4.1m is required to allow two cars to pass. However, this may need to be increased further should there be an acute angle or a bend in the alignment, which appears to be the case in this arrangement. This could cause extra manoeuvring and obstruction within the car park for those accessing and egressing at peak times, which is a concern considering pedestrians will also be walking within the car park as there is no dedicated pedestrian path through the site.

It is also noted that the public car park spaces are located beyond the residential dwellings and their associated parking which is shown to the rear of the dwellings, which is a further concern as pedestrians approaching the pub from the pub car parking spaces or vice versa will need to pass the parking spaces for the residential dwellings and there is no designated safe route for pedestrians within this area.

Cycle Parking & Pedestrian access: It is stated in LPGN16 that for the residential dwellings should be provided with at least 2 secure cycle parking spaces per dwelling. Whilst it is considered that storage could be provided within the proposed gardens, access to the garden gates is blocked by the proposed car parking spaces and unimpeded access is required. Furthermore, no cycle parking spaces are detailed for the public house use, to accord with the standards set out in LPGN16 the provision of 4 cycle parking spaces should be provided. Whilst the public house may not be a new installation, the proposals do constitute an amendment to the existing parking and servicing arrangements and should therefore be clarified. It is considered that there is adequate space within the terrace/outdoor seating area to provide the required cycle parking spaces which should accord with the 'design of cycle parking spaces' as set out in LPGN16.

An Aco drain demarcation has been provided, which will remain in private ownership and must be maintained by the landlord of the shared private access road. Construction drawings should be provided with an application for a Section 278/38 agreement for the entrance and footpath works. These works should be completed prior to occupation. The Aco drain location should be agreed on site with the highway authority, and SAB officer as part of the S278/38 & SAB surface water drainage works. The S278/38 agreement is a post planning approval matter, arranged with the highway authority.

The applicant has confirmed a management company can be set up to maintain the shared private access road and landscaping. If not, the maintenance responsibility will remain with the landlord.

Visibility: The site fronts onto Railway Road which is a 20mph road, as such the visibility requirements set out in Manual For Streets state that visibility splays of 2.4m x 25m in either direction to the nearside kerbline should be provided. The visibility proposed within these plans accords with this standard to the east, it is considered that the proposed footway in front of the proposed dwellings helps secure adequate visibility in this direction. The visibility to the west is substandard with 2.4m x 12m available as the building line restricts any further visibility. Whilst the LHA would recommend the access road is realigned to the east to provide the full requirements of 2.4m x 25m, it is understood that the access is existing and this change of use does not constitute an intensification of use and therefore does not create any increased risk to the existing situation/uses. Furthermore there are no recorded accidents, nor is this road a busy thoroughfare.

Illumination of the car parking area should be provided in the interests of pedestrian safety.

Summary and Conclusion

In its current form the proposals are not acceptable on highways grounds. There is no mobility parking proposed, there are car park access and arrangement issues, and cycle parking amendments are required to the proposed parking provision and layout as follows:

- There is a concern that the parking proposals do not accord with the requirements set out in LPGN16 that would require at least 1 mobility space of dimensions 2.4m x 4.8m with a 1.2m shared aisle to be provided. Inclusive Mobility (2021) states that 'Ideally, designated accessible spaces should be located adjacent, or as close as possible, to the entrance to the facility they serve'. Can a mobility space be accommodated closer to the pub? If not, then one space should be amended to accord with the requirements, whilst still providing the necessary circulation space.
- Furthermore, there are issues with the proposed car park layout due to the narrow nature of the space available when passing parking space number 1. Just 3.7m width is provided which does not allow two cars to pass each other, Manual For Streets details that a minimum of 4.1m is required to allow two cars to pass, however, this may need to be increased further should there be an acute angle or a bend in the alignment, which appears to be the case in this arrangement. This could cause extra manoeuvring and obstruction within the car park for those accessing and egressing at peak times, which is a concern considering the access is a shared surface for pedestrians and vehicle with no segregation.
- It is stated in LPGN16 that for the residential dwellings should be provided with at least 2 secure cycle parking spaces per dwelling. Whilst it is considered that storage could be provided within the proposed gardens, access to the garden gates is blocked by the proposed car parking spaces and unimpeded access is required. Furthermore, no cycle parking spaces are detailed for the public house use, to accord with the standards set out in LPGN16 the provision of 4 cycle parking spaces should be provided. Whilst the public house may not be a new installation, the proposals do constitute an amendment to the existing parking and servicing arrangements and should therefore be clarified. It is considered that there is adequate space within the side terraced area to provide the required cycle parking spaces which should accord with the 'design of cycle parking spaces' as set out in LPGN16.

Should the LPA be minded to grant permission, the LHA would recommend the provision of a simple Service Management Plan and a Car Parking Management Strategy, so that directional signage, road markings and delivery arrangements within the A3 category can be managed.

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SERVICE AND DELIVERY MANAGEMENT PLAN

The development shall not be occupied until a Service and Delivery Management Plan has been submitted to and approved in writing by the Local Planning Authority. Servicing and deliveries to the development shall take place in accordance with the approved Service and Delivery Management Plan.

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CAR PARKING MANAGEMENT PLAN

Prior to first beneficial use of the premises, a Car Parking Management Plan shall be submitted to, and approved in writing by, the Local Planning Authority. The approved plan shall thereafter be adhered to for the life of the development.



On behalf of The Chief Officer, Environment & Technical