MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO::	Dafydd Thomas
Our Ref:	ET/DC/AC/P/2024/1692	**Your Ref:**	P/2024/1692
Date:	06/01/2025		

TOWN AND COUNTRY PLANNING ACT 1990

PROPOSAL : DEMOLITION OF ENGEDI CHAPEL AND BRYMBO METHODIST CHURCH AND ERECTION OF 16 APARTMENTS / DYMCHWEL CAPEL ENGEDI AC EGLWYS METHODISTAIDD BRYMBO A CHODI 16 O FFLATIAU

LOCATION: ENGEDI CHAPEL AND BRYMBO METHODIST CHURCH, HIGH STREET, BRYMBO, WREXHAM, LL11 5BL

With reference to the above planning application.

The proposed development comprises the demolition of an existing church and the erection of an apartment block comprising 16 no. one bed apartments.

The proposed development site is bounded by the High Street and the cul de sac Tai Owain which are both unclassified roads subject to a 20mph speed limit.

The Local Highway Authority (LHA) has previously provided comments on the application in an Memorandum Note dated 07/04/2025. In response to this, the applicant's transport consultant, Focus Transport Planning (FTP), has produced a technical note providing additional information (Ref J000488-HTN01b dated July 2025).

This Memorandum, provides comment and feedback on the latest FTP technical note in the order presented in FTP's note.

POINT 1: CONFIRMATION OF SPEED SURVEY DATA
The LHA has requested further clarification of the speed survey undertaken on High Street as part of the initial Transport Statement. Whilst FTP have provided the northbound speeds as requested, minimal information regarding the methodology used by the survey company has been provided. it is still unclear where on High Street the survey was undertaken.

Furthermore, there is no explanation on how the sample size was selected given that CA185 advises a minimum of 200 vehicles should be recorded during each measurement period. Furthermore, details of what time of day the surveys were undertaken, length and whether the time-of-day of the surveys influences vehicle speeds.

Vehicle speeds measured using an ATC loop would have allowed for a greater understanding of vehicle speeds throughout the day and would have also captured a larger sample size for review.

It is recommended that further speed survey information be provided so that the LHA have confidence in the methodology used for determining the 85th percentile speeds on High Street.

POINT 2: CONFIRMATION OF EXISTING HIGH STREET VEHICULAR ACCESS
FTP has confirmed that that there is a historical access present on High Street to the proposed site which is circa 3m in width.

No further information is required in respect to this issue.

POINT 3: PROPOSED ACCESS OFF TAI OWAIN
The FTP note includes a plan (FTP Drawing J000488/SK003) illustrating visibility splays at the proposed driveways/parking spaces on Tai Owain. It states that visibility splays of 2.0m x 11.5m and 16.2m, measured to a 1m offset from the nearside kerb, can be achieved from the driveways.

Based on an assumed vehicle speed of 10 mph (as advised by the LHA in the initial response), the required visibility splay is 2.4m x 11m. However, as set out in Figure 7.18 of Manual for Streets, this should be measured to the nearside kerb line – and not to a 1m offset. Furthermore, the standard x-distance should be 2.4m, not 2.0m as shown on FTPs drawing. FTP's drawing therefore does not demonstrate compliance with usual standards.

This said, given the narrow road width, low vehicle speeds, and likely low traffic volumes on Tai Owain, the LHA are prepared in this instance to accept the visibility splays at the proposed driveways/parking spaces on Tai Owain as shown.

The pedestrian splays shown on the drawing are also noted.

In the previous response, the LHA required:

- The access/parking area to be surfaced with hard-bound material.
- No gates to be installed.
- An Aco drain or similar to intercept surface water runoff where access slopes toward the highway.

FTP's latest response confirms compliance with the first two requirements. They also confirm an Aco drain will be provided at the main site access off High Street but argue it is unnecessary at Tai Owain because:

1. The parking spaces fall away from the highway.
2. The spaces use SuDS-compliant paving.

This is demonstrated on Drawing 24033/SK501 and is considered acceptable.

The LHA previous response also previously advised that:

1. Ideally, the parking provision off Tai Owain should include off-road turning space.
2. The questioned the adequacy of turning/manoeuvring.
3. LPGN16 requires a minimum of 6m clearance behind a parking space for turning.

FTP's note responds that:

- Site constraints prevent on-site turning provision.

- While acknowledging 6m clearance is typical required behind parking bays, the access zone around the accessible spaces ensures that both spaces are accessible.

However, as noted in the LHA response to Point 10 below, the swept paths still show an estate car overrunning the proposed hardstanding and external footway and appears to strike / overrun the embankment as the car reverses out of the northern parking bay. This remains unacceptable.

The applicant must revise the layout to ensure all vehicle manoeuvres occur within the carriageway and designated parking areas, with minimal encroachment onto footways or pedestrian hardstanding.

POINT 4: PROPOSED ACCESS OFF HIGH STREET

The LHA has previously stated that if the 85th percentile speed was accepted, visibility splays of 2.4m x 25.5m in both directions, measured to the nearside edge of the adjoining highway, would be required from the proposed access.

The noted that the submitted layout plan (Drg. No. J000488-SK-102 Rev A) indicated that the following visibility splays were shown:

1. 2.0m x 25m to the south, measured to the nearside edge.
2. 2.0m x 25m to the north, measured to the centreline of the adjoining highway.

The LHA previously advised that these splays were not acceptable, due to:

- The reduced setback distance (2.0m instead of 2.4m).
- Measuring to the centreline in the northerly direction for a shared access of this nature and location.

The LHA recommended that the applicant reconsider the access location and provide this detail on a revised layout plan. In their latest note, FTP has confirmed that relocating the access is not viable.

FTP has referenced MfS 2, para 10.5.8, which provides justification for a 2.0m setback, and argues that measuring the northbound splay to the centreline is acceptable given the narrow nature of High Street, where overtaking is not possible.

For the reasons stated in FTP's latest note, the LHA accepts in this instance:

1. A 2.0m setback.
2. Measuring the northern splay to the centreline of the carriageway.

However, Drg. No. J000488-SK-102 Rev A does not clearly show whether:

- The northern splay is measured to the centre of the carriageway.
- The splay avoids the corner boundary of the adjoining third-party property.
- The wall also appears to be in excess of 0.6m which would obstruct the available visibility. The applicant should confirm the status of this wall to ensure the visibility splay is not obstructed.

Therefore, the LHA request that a new visibility drawing should be provided:

- Extend further north.
- Clearly showing whether the splay avoids third-party land remaining within either the applicant's land and/or the adopted highway boundary.

Additionally, as noted in Point 1, the LHA still require further details of the speed survey and the resulting 85th percentile speeds. Once this is resolved, LHA will confirm the visibility splays are acceptable.

The LHA has also previous requested:

- Dropped kerbs/tactile crossing points across the main access, set back to the narrowest point.
- Extension of the limit of adoption to the back of any proposed crossing points.
- That the Applicant enter into a Section 38/278 agreement with the Council for construction of the access/crossings.
- Access surfaced with hard-bound materials for 5m behind the highway.
- No gates across the proposed access.

FTP's note confirms all these five items are acceptable and shows them on the updated site plan (CREU-C484-006-K-PROPOSED SITE) where appropriate.

A revised drawing extended to the north showing the visibility splay avoiding third party land and drawn to a clearer definition should be provided.

POINT 5: PROPOSED FOOTWAY / CROSSING IMPROVEMENTS
The LHA welcomes the provision of a footway along the site boundaries to High Street and Tai Owain as previously requested.

FTP's latest note states that the footway is 2 m wide, with a 1.2 m pinch point approximately midway along the site's eastern boundary on High Street where the building protrudes. However it appears that there are also other locations not mentioned within the text of FTPs note along the two boundaries where the full 2 m width is not achieved.

Notwithstanding this, it is acknowledged that a 2 m footway is provided along the majority of the boundary. This represents a significant improvement over the existing situation and is therefore considered acceptable.

However, it is not clear whether the 2m wide footway has been provided by taking land within the development site or by widening into the carriageway. Given the narrow nature of the existing carriageway, widening into the carriageway would not be acceptable. The applicant should confirm.

FTPs Drawing No. 020 Rev H also shows dropped kerbs and tactile paving at the High Street / Tai Owain northern corner to assist pedestrians crossing Tai Owain when travelling south toward the bus stop and beyond. This same provision should also be shown on the opposite (southern) side of the junction.

The LHA previous comments on vehicular access to the undercroft parking are stated that: *"The LHA typically recommend a maximum access gradient of 1:24 for the first 10 m behind the adjoining highway, then a maximum of 1:12 thereafter."*

Drawing 006 Rev K in FTP's response shows a gradient of 1:24, but Drawing No. 020 Rev N shows gradients of 1:17 immediately behind the adjoining highway, transitioning to 1:22 and 1:23. The applicant should clarify which gradient is proposed. The previous advice regarding gradients still stands.

FTP note that the proposed access will operate as a shared-surface route, given the limited number of parking spaces served. A headroom clearance of 2.9 m is also proposed for the undercroft parking area.

Given the small number of parking spaces proposed, the proposal for the access to operate as a shared-surface route is accepted. However it is noted that a headroom clearance of 2.9m is not sufficient for a fire appliance to enter. However, in the LHA previous comments it was stated that "*it is assumed that WCBC Building Control Section will need to check such details in respect of access for emergency service vehicles*" – still stands.

The applicant is required to undertake the following:

- **Confirm how the widening footway along Tai Owain and High Street has been provided**
- **Replicate the dropped kerb and tactile paving detail currently shown at the High Street / Tai Owain corner on the opposite (southern) side of the junction.**
- **Resolve the contradiction between Drawing 006 Rev K (1:24) and Drawing 020 Rev N and provide a definitive access gradient profile that complies with the LHA's guidance: 1:24 for the first 10 m behind the highway, then max 1:12 thereafter.**
- **Comments still needed from WCBC Building Control Section in respect to access for emergency service vehicles.**

POINT 6: PARKING AND TURNING PROVISION

In the previous response, the LHA noted that the proposed parking provision falls below the standards set out in LPGN16. However, it is acknowledged that, given the outcome of a previous planning appeal which accepted a reduced level of parking, it would be difficult for the LHA to object to the parking provision proposed for this development.

FTP have confirmed that there are no plans to reduce or reconfigure the scale of the development to either reduce the parking provision required or increase the level of parking.

POINT 7: CYCLE PARKING / STORAGE

The previous comments referenced LPGN 16, which requires flats to provide sufficient space for at least two secure cycle parking spaces per dwelling, located in safe, communal cycle parking areas. For this development, that equates to a minimum of 32 cycle spaces.

The FTP Note states that the basement cycle store has been extended, as shown in drawing CREU-C484-020-N-LEVEL 000 PROPOSED, to accommodate 21 cycles. It further argues that this provision—more than one space per unit—is considered sufficient based on experience with similar apartment schemes.

However, given the site's low parking provision, poor accessibility to public transport, it is recommended that cycle parking be provided in full compliance with LPGN16 minimum standards.

Further cycle parking provision is required to conform to LPGN16.

POINT 8: TURNING PROVISION – DELIVERY VEHICLES

In the previous comments, the LHA noted that it was unclear how delivery vehicles visiting the site would turn or drop off within the site's curtilage. The LHA requested that the applicant demonstrate, on a suitably scaled plan, how such vehicles could turn and drop off when all proposed parking spaces are fully occupied.

The applicant has responded as follows:

"*Servicing requirements are likely to comprise weekly refuse collection and occasional deliveries. It is proposed that such manoeuvres occur on-street, as per servicing access to all properties at High Street. Small delivery vehicles could turn within the undercroft parking area if required, as shown. Alternatively, service vehicles could utilise the parking area for the adjacent apartment development off Tai Owain."*

From the swept path extract in FTP's note, it appears that a small delivery vehicle can turn within the undercroft parking area and enter/exit in forward gear when the parking spaces are occupied.

However, the Proposed Site Plan shows bin storage located in the northern section of the site, off Tai Owain. It is unclear whether this bin store serves the entire development or only that section. It is also unclear how bins will be moved from the bin store to on-road collection points. Furthermore, if collection is intended from Tai Owain, it is uncertain whether a refuse collection vehicle can access Tai Owain, collect the bins, and turn around to exit safely.

Further information is therefore required on the proposed refuse collection strategy for the entire development. This should include details of where and how refuse vehicles will collect bins and manoeuvre. This should be illustrated on a suitably scaled plan where necessary.

POINT 9: CAR PARKING MANAGEMENT PLAN

The LHA previous comments stated that '*If the application is supported with limited parking provision, then the LHA would recommend a condition requiring the submission of a car parking management plan to include details of how such parking arrangements will be managed to ensure there is no overspill of parking onto the adjoining highway*.'

The applicant has responded as follows:

"The applicant would note that management of their car parks has not been necessary due to the low car ownership amongst residents. Indeed, as 1 space per unit is proposed at this site, it is expected that there will not be any issues with parking on-site. It is therefore considered that the submission and operation of a car parking management plan is not required".

The LHA request that further information on the parking situation at similar Wales and West Housing Association developments be provided before this response can be accepted. If this information is not forthcoming, it is still the LHA's view that a car parking management plan is required and a suitable worded planning condition recommended.

POINT 10: SWEPT PATH ASSESSMENT

In the previous comments, the LHA noted that the swept path details for the proposed two mobility spaces did not accurately reflect the kerbline or width along Tai Owain. Furthermore, the swept paths indicated a vehicle encroaching onto the proposed hard standing area and internal footway, which the LHA considers unacceptable.

Whilst the latest swept path drawings now include the kerbline along Tai Owain, the paths still show an estate car overrunning the proposed hardstanding and external footway and appears to strike / overrun the embankment as the car reverses out of the northern parking bay. This remains unacceptable.

The applicant must revise the layout to ensure that all vehicle manoeuvres are contained within the carriageway and designated parking areas, with minimal encroachment onto footways or hard standing intended for pedestrian use.

POINT 11: TRAFFIC GENERATION

The previous comments requested that the traffic generation for the site be updated to take account of revised TRICS data, including:

- Privately owned flats be used
- The TRICS data must be no more than 8 years old.
- Either Neighborhood Centre or Free-standing sites should be reviewed
- Site from Ireland are excluded.

This has been undertaken in FTP's note, however, as they point out, this has resulted in minimal sites being included within the TRICS sample, a far lower sample size than would normally be

required. However, the resultant trip rates are of a similar magnitude to those included within the original Transport Statement.

FTP's note also states that the applicant, Wales and West Housing Association, will be building the dwellings as affordable dwellings and that they would be happy for any future decision notice for the development to include a condition ensuring that 100% of the dwellings are affordable dwellings and that they remain as affordable dwellings in perpetuity.

Based on the additional information provided, the trip rates and resultant trip generation set out in the original Transport Assessment are deemed to be acceptable in this case and it is accepted that the proposed development "*would not give rise to a severe detrimental impact on the local highway network operation".*

No further information is required in respect to this issue.

ADDITIONAL LHA COMMENTS

Sustainability

The previous LHA response, it was noted that it was the LHA's view that it would not consider the site to be in a highly sustainable location. This view still stands.

Refuse Collection / Recycling

It was previously stated that the double access gates opening onto the highway at Tai Owain was unacceptable and that any gates should open into the development and that this would need addressing on a revised layout.

This does not appear to have been addressed on the drawings attached to the latest FTP's highway response.

This issue still needs to be addressed.

Construction Traffic management Plan (CTMP)

The LHA previously stated that if an application for development is supported at the site, the LHA recommend any permission includes the following condition:-

"No part of the development shall commence until a Construction Traffic Management Plan including provisions for contractor parking has been submitted to and approved in writing by the Local Planning Authority and the plan as is approved has been fully implemented".

This view still stands.

SUMMARY

In conclusion, the LHA requests the following information before the application can be supported:

1. Further details provided on the methodology used for the speed surveys.
2. A revised drawing extended to the north, showing the visibility splay without relying on third-party land and presented with clearer definition.
3. Confirmation of how the widened footway along Tai Owain and High Street has been achieved.
4. Replication of the dropped kerb and tactile paving detail currently shown at the High Street / Tai Owain northern corner on the opposite (southern) side of the junction.
5. Resolution of the conflict between Drawing 006 Rev K (1:24) and Drawing 020 Rev N, and provision of a definitive access-gradient profile that complies with LHA guidance (i.e. 1:24 for the first 10 m behind the highway; Maximum 1:12 thereafter).
6. Additional cycle parking provision to conform with LPGN16.
7. Further detail on the refuse collection strategy, including the location and method of bin collection and vehicle manoeuvres, illustrated on a suitably scaled plan where necessary.

8. Information on parking demand at comparable Wales & West Housing Association developments to demonstrate that a car-parking management plan is not required.
9. Confirmation and/or revision of the parking layout along Tai Owain to ensure all vehicle manoeuvres occur within the carriageway and designated parking areas, with minimal encroachment onto footways or pedestrian hardstanding.
10. Confirmation or updated plans showing that the double access gates will not open onto the Tai Owain highway.

KWEdwards

Contracts & Engineering Manager

On behalf of Chief Officer, Environment & Technical