

MEMORANDUM

From:	Chief Officer, Environment & Technical	To:	Chief Officer Economy & Planning
		FAO:	Philip Mullineux
Our Ref:	ET/DC/AO/P/2023/0800	Your Ref:	P/2023/0800
Date:	14/01/2026		

TOWN AND COUNTRY PLANNING ACT 1990

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)

The following comments are in response to the Additional Information submitted by the applicant in October 2025.

The previous LHA consultation response (29/05/25) identified a number of issues that required addressing before a final position could be reached. For simplicity, this response follows the previously raised points to consider if each has been addressed (previous LHA comments are shown in italics).

Previous Comment: Vehicle tracking of all turning areas should be provided to indicate that a 12m sized fire tender can access and safely turn within the site.

This information has been provided and is considered satisfactory.

Previous Comment: Amendments are required to the link to the PROW from the B1 / retail units, needs to be from the footway for pedestrians rather than the car park aisle.

The site layout plan still appears to show the PROW connection joining the car park area rather than connecting to a footway / footpath. This is not acceptable as this deposits pedestrians in the turning area of the car park, when there is ample space for the connection to route around the parking area to the indicated footways. **This matter is still required to be amended.**

Previous Comment: 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.

The site layout and other supporting plans still show significant lengths of non-adopted / private driveways. This is not acceptable to the LHA for the following reasons:

- Several of these driveways are too long to not have formal pedestrian provision
- WCBC Refuse Collection Vehicles (RCVs) will not enter private roads / private driveways. Therefore, bin drag distances and RCV collection distances must be in accordance with the maxima set out in BS 5906:2005.
- Several of these driveways provide either full or part access to apartment blocks. This is not acceptable from a traffic volume perspective, but also it is unlikely a suitable ManCo could be established for such a number of owners.

As shown, and as communicated previously, the layout cannot be accepted by the LHA.

Previous Comment: Active Travel connections to the external network and internally should be clarified, the Welsh Active Travel Act Guidance has been introduced since the outline permission was granted and Active User provision must therefore meet these requirements.

The latest site layout plan shows the PRow connections and the proposed new Active Travel Route. However this plan does not indicate details of how the PRows will be surfaced or dimensions of these. **The LHA request that these details are provided.**

The proposed internal Pedestrian / Cycleway link should be designed to the standards in the Welsh Active Travel Act Guidance. In particular, where this route crosses carriageways, crossings should provide pedestrian / cycle priority over vehicles. The connection of the proposed Pedestrian / Cycleway route at the mid-western point of the site (to the immediate south of PRow ESC/28 (adjacent to unit 88)) should tie in to the footway at a square or parallel angle. The acute angle shown prevents clear visibility for users approaching from the south. Similarly, the detail of the connection with the Bangor Road frontage should be shown. At the start/end points of the route suitable tactile paving must be shown to make clear start/end of shared provision. **This detail should be included.**

The proposed Pedestrian / Cycleway starts/ends at its southernmost point adjacent to unit 33 and appears to connect to PRow ESC29, before then branching off to connect to Bangor Road. No detail is provided, but **the PRow must therefore be provided to the same width, standard and surfacing (as should all PRows crossing the site) as the shared path.**

Simialrly, the PRow routes over the site in places do run contiguously with footways. **The detail of how the PRows will be re-provided should be shown.**

The LHA also notes that the PRows crossing the site and which are referred to on the 'Site Connectivity Layout' drawing are all currently designated as 'Footpaths' which legally cyclists cannot / should not use. **Where the aspiration is to utilise these routes for cycling as well as walking, the legal status of these PRows will need to be changed. The applicant should contact WCBC's Public Rights of Way officer in this regard.**

Further detail is required before this point can be signed off.

Previous Comment: The secondary access / emergency access requires further clarification, this should link into a 3m cycleway/footway on the Hafod Road frontage, 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.

It is noted that on the plans showing the achievable visibility splays from the emergency access, the 'X'-distance of the splay is taken from the edge of carriageway, rather than the back edge of the shared footway/cycleway. As noted previously in emergency scenarios this would not necessarily be an issue, but in a non-emergency scenario that require traffic to utilise this access point, the pedestrian/cycle route would be a continuous footway over the access, thus the giveway line would be at the back of the footway. **The visibility splays for this access will need to be re-drawn on this basis.**

The previous LHA comments also stated that a Road Safety Audit of this access point would be required. **This detail appears not to have been provided, but will still be needed.** As noted in the previous response, **this layout should show the detail of how the shared provision on Hafod Road will interface with this access** (given it is also a permanent pedestrian/cycle access as well as being an emergency access).

Further to the above, the proposed shared 3m footway / cycleway is shown indicatively running along the eastern frontage of the site. In places this falls within or partly within the red line envelope, in other places it falls partly or fully outside. The existing highway boundary along this frontage appears to be at the back of carriageway or in places, part of the verge. It does not appear to extend

contiguously to what is shown as the edge of the red line, resulting in sections where there is a gap between highway boundary and red line. This raises a complication of how this is managed. Firstly, confirmation will be needed that where there is a gap between red line and highway boundary, that this land is in the applicant's control. Assuming it is, there will then be a requirement to adopt the full width of the path as public highway via a S-38 application. If there are gaps in ownership this may prevent this element of the scheme being delivered and alternative provision would need to be identified. **The LHA will therefore require a plan to be provided to show ownership status along this western frontage, to identify and confirm what action is needed.**

Noting that the outline permission predates current Active Travel guidance, shared pedestrian / cycle provision (as proposed along this western frontage) is not recommended. However the Welsh Government Active Travel Act Guidance (2021) states at paragraph 9.17.9 that "*Shared footway/cycle surfaces are not generally recommended but can offer a practical solution in rural and suburban areas where pedestrian and cycle traffic is light.*" Given this definition accords with likely demand in this area, **the LHA will accept the proposal for shared provision on Hafod Road, on condition it is provided in accordance with the requirements of the Active Travel Act Guidance for the full length as shown, to a minimum of 3m. In this regard, the LHA would also direct the applicant to Table 9.9 (page108) of the guidance, which sets out the need for a buffer strip, given Hafod Road is higher speed.**

At the junction with Bangor Road, suitable crossing provision should be shown over Hafod Road and Bangor Road to tie in with the existing Shared provision on New Hall Road. **This detail should be shown on plans and must form part of the proposals for this route.**

The above points and detail are required to be provided.

Previous Comment: *The applicant should liaise with Wrexham's' Public Right of Way officer on how existing PROWs within the site are to be diverted.*

The revised information states that PROWs are no longer to be diverted. **However, other comments relating to PROWs will still require the applicant to liaise with the SCBC PROW officer.**

Previous Comment: *Amendments are required to the staff cycle parking shown for the retail use.*

The additional information provided in drawing GL/BRJ/P/BSS/02, addresses this requirement and meets the requirements of the Active Travel Act Guidance for cycle parking details. **On the basis that Sheffield stands in accordance with the design and layout as shown on this plan will be provided in the quantum indicated, this comment has been addressed.**

Previous Comment: *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 and result in danger or obstruction to pedestrians and vulnerable users.*

The revised site layout plans and parking schedule have been reviewed and a number of issues have been identified and / or remain present (as identified previously):

- Several dwellings are shown with remote parking. For instance (but not limited to) Plots 1, 16, 24, 107, 143, 154, 160, 168, 190, 251 and 264. The concern in such instances is that this will not be convenient and occupants will instead park on-street or on-footway resulting in operational and safety issues. Given in most cases these are corner plots, this could lead to on-street parking in and around junctions. Whilst the LHA accept in some cases this 'remote' parking design will be necessary, the number of such examples on the current plans is significant and could have a cumulative impact.
- In places some parking spaces appear difficult to access/egress – e.g. unit 28 westernmost space, Plot 31, apartments 17-20 the western most space. Plots 214 and 215 each have a third space which appears to require a vehicle to drive over gardens to access/egress. The

concern is that cumulatively these spaces may not be usable and encourage on-street / inappropriate parking.

- Plot 217 appears to only have 2-spaces (not 3).
- The parking spaces for Plot 1 are close to / within the junction these should be reconsidered.
- A number of the apartment blocks have fewer spaces than required. Block 5-8 is 5 spaces rather than 6, 51-62 is 16 spaces rather than 18 etc. 1 Bed apartments should have 1.5 spaces per unit.

It is noted that the parking schedule refers to a number of 3 bed dwellings with 4-parking spaces. This does not appear to be replicated on the site layout plan. Whilst 3-spaces meets the parking standards, 4-spaces would exceed this. **Clarification is requested in this regard.**

At several locations the carriageway width reduces. **Clarification is required as to why this proposed and indication of carriageway widths provided on the site layout plan. A scale bar would also be beneficial to all the LHA to easily check other geometric parameters.**

Internal visibility splays have been provided for most junctions and key access points. Those that are shown are acceptable. However, some key junctions have been missed – **Splays for Apartment blocks 5-8, 17-20, 51-62, 174-177, 274-277 are required.**

Splays will also be required for the parking spaces along the private driveway of apartment block 51-62. Visibility to both directions appears to be restricted by the building.

Boundary treatment proposals will be required to ensure the indicated visibility is achievable and that driveway access/egress is not affected by restricted visibility – especially where driveways are near junctions.

Also as noted in the previous LHA response:

Bin Collection Points: As noted earlier the extensive use of private driveways is not acceptable and appears to not comply with maximum collection distances. It is noted that a Waste Management Drawing has been provided. This however, does not show the collection points for the apartment blocks. Linked to the above, maximum distance apply here also and several cases (apartments 51-62 and 131-142 for instance) the drag distance appears to exceed the permitted maximums. **This should be reviewed and amended accordingly.**

Office and Retail Units

As noted previously, the proposed junction arrangement at the access junction to the retail/office area is not acceptable and remains unchanged in the latest submission. The junction markings as shown on non-standard and do not comply with a standard give way arrangement as shown in the Traffic Signs Regulations & General Directions. **This will require to be updated to avoid any possible confusion in the future.**

Swept-paths for this area have been provided. The turn out of the retail area for the HGV and RCV involves the vehicle encroaching into the oncoming traffic lane. Whilst the LHA accept this will be an infrequent movement, this encroachment will take place close to the junction. **Therefore the LHA will require the plan to be updated to show the forward visibility for vehicles turning into the retail link road and details of the surrounding boundary treatments.**

The arrangement for the servicing of the retail unit appears to be based on the HGV reversing to the side of the unit. If this is the case, this would conflict with the parking spaces for the retail unit preventing vehicles entering or exiting this parking area. **Clarification will be required of how this conflict is to be managed and a Servicing Management Plan required to supplement this.**

Linked to the above, it is also unclear how the office units are to be serviced, given the bin storage is indicated at the furthest edge of the office car park. The car park has no turning provision, therefore it is unclear how this servicing will be safely managed. **The Servicing Management Plan will need to cover this element also.**

For this area boundary treatment details will also be required, particularly to confirm if the cycle parking area is open, overlooked and secure.

- Cycle parking within the apartment blocks cannot be assessed due to the poor quality of 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.
- 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.

Continuous Footways:

Notwithstanding points on the acceptability of shared private driveways, the treatment of junctions with the apartment blocks and junctions of shared private driveways is inconsistent, with the former having kerbed accesses, the latter continuous footways. Continuous footways provide pedestrian priority and the LHA requests these be used at all shared private driveways and apartment accesses. **These locations should be updated accordingly.**

Main Access junction:

The detail shown for the main site access junction in terms of carriageway markings is unclear in all plans and appears to show both proposed and existing carriageway markings. **For the avoidance of any doubt, the proposed markings should be shown in a different colour to proposed.** It is also noted the swept-path for the Refuse Collection Vehicle (RCV) turning right into the site overlaps significantly with the adjacent ahead (nearside) lane. This is not acceptable from a road safety perspective and must be addressed.

Dropped kerb and tactile paving will be required at the main site access junction. Here also TSRGD compliant carriageway markings should be shown for the avoidance of any doubt.

The site plans should be amended accordingly.

Refuse Collection Vehicle (RCV):

Within the main area of the site and unless specific otherwise the RCV tracking as shown on drawing 1232/SP/07 is acceptable.

Adoptable Highways Plan:

As noted earlier in this response and noted in previous responses, the LHA will not accept long sections of shared private driveway, for numerous reasons. The Council's refuse teams will not enter private roads and on this basis alone the long lengths of unadopted roads as shown will not be acceptable. **This aspect must be reconsidered.**

Site Connectivity Plan:

As noted earlier, updates and further information are required for both the PRow's crossing the site and the proposed active travel connectivity. **For the avoidance of any doubt the key on the Site Connectivity Plan should be updated to refer to a "Public Footway / Cycleway" rather than "Public Cycleway".**

Site Spine Road and Connecting Roads:

For the avoidance of any doubt, the LHA request that the plans be updated to show the carriageway widths and footway widths of all roads within the site

Construction Traffic Management Plan:

As note in previous responses a CTMP will be required for the full site prior to commencement.

Summary

The LHA has reviewed the additional information that has been provided. Whilst some previously raised comments have been addressed, a number of previously points remain outstanding. At this time the LHA cannot support the application.

On behalf of the Chief Officer, Environment & Technical

A handwritten signature in purple ink, appearing to read "Klaus", is positioned below the text. The signature is fluid and cursive, with a prominent initial 'K' and a trailing flourish.