MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO::	Philip Mullineux
Our Ref:	ET/DC/DB/P/2025/0833 Response 2	**Your Ref:**	P/2025/0833
Date:	23rd February 2026		

PROPOSAL: NEWID DEFNYDD AIL A THRYDYDD LLAWR YR ADEILAD O DDOSBARTH B1 (SWYDDFEYDD) I GREU 30 O FFLATIAU (DOSBARTH C3) GAN GYNNWYS CREU MANNAU PARCIO YCHWANEGOL, STORFA AR GYFER BINIAU, STORFA AR GYFER BEICIAU A DIHANGFEYDD / CHANGE OF USE OF SECOND AND THIRD FLOOR OF BUILDING FROM CLASS B1 (OFFICES) TO CREATE 30 NO APARTMENTS (CLASS C3) INCLUDING CREATION OF ADDITIONAL PARKING SPACES, BIN STORE, CYCLE STORAGE AND MEANS OF ESCAPE
LOCATION: ROXBURGH HOUSE, 12 HILL STREET, WREXHAM, LL11 1SN

We refer to your consultation dated 18 November 2025 regarding this proposal to request existing Class B office space to Class C residential in the form of 30 no 1 bed apartments and associated communal areas including parking spaces, bin stores and cycle parking.

Further to the LHA consultation response dated 6 February 2026, the following additional information is required before a final assessment can be made:

The submitted Design and Access Statement does not confirm whether any third parties hold rights of access or parking within the site. The applicant is therefore requested to clarify whether any other occupiers—including the ground floor commercial units—benefit from legal rights to use the parking bays or rear service area for purposes such as emergency egress, servicing, refuse collection, or cycle storage. These units are currently identified as “unsurveyed” and are considered outside the scope of the application unless such rights exist.

Although the car park and access is existing, the applicant should also provide segregated pedestrian and vehicle routes within the rear yard. This should be shown on an updated proposed site plan, including demonstration of swept paths for service vehicle. For new build schemes, the LHA would normally require service vehicles to enter and exit the site in a forward gear; this is not achievable here due to site constraints. Any requirement for refuse vehicles to reverse must therefore be

managed appropriately, for example through the provision of banksmen. It is further noted that the access driveway and car park are privately owned and fall outside the adopted highway and the LHA's direct control.

The following narrative is from the LHA's initial response, which includes other queries that require response:

Access

Pedestrian access will continue to utilise the existing entrance off Hill Street.

Vehicular access will also remain via the existing shared access.

The proposal involves continued use of the existing entrance adjacent the Little Theatre. The proposed residential use may typically introduce an increased flow, with potential for repeated trips during the day, as compared to commercial parking often involving a single return trip each day.

Furthermore, as other users may commonly be arriving at a time when residential use traffic may be statistically more likely to be leaving, the importance of vehicles being able to pass in opposite directions is a significant consideration.

Although the 5.7m width is sufficient for two vehicles to pass, it is evident that the landlord has difficulty preventing unauthorised parking despite double yellow lines and bollards.

Maintaining the ability for 2-way traffic is considered for highway support. Perhaps reinforced road markings or instruction of a 'two-way zone' for unauthorised vehicles.

The Local Highway Authority are concerned regarding limited pedestrian visibility to the north of the access. This could be improved by installing a barrier—such as an illuminated bollard—positioned to guide pedestrians closer to Hill Street, where a 2m x 2m visibility splay is achievable. The applicant should also consider resurfacing the pedestrian crossing point with a contrasting material to emphasise pedestrian priority.

Additional signage or road markings advising drivers to proceed slowly and be aware of pedestrians would further support safe operation of the access. Subject to these measures, the Highway Authority is satisfied that the increased trip rates associated with residential use can be accommodated.

Visibility

Hill Street is a 20mph unclassified adopted highway. Visibility to the north with a 2.4m setback (to the centre of the carriageway on the bend) x 64m, well in excess of the minimum 2.4 x 25m required for a 20mph road. Visibility to the south is 2.4m x 38m, to the nearest kerb also comfortably in excess of the 25m required.

Parking

The proposal provides 15 resident parking spaces and 4 visitor spaces.

Given the site's central location—approximately 210m from a bus stop and even closer to Wrexham Central Station—the level of provision is considered acceptable. Comparable city-centre schemes have been supported with significantly lower parking ratios than those set out in LPG16.

Traffic generation

The proposal involves converting 2,033m² of commercial floorspace to 1,933m² of residential accommodation, including associated parking and ancillary areas. The provision of 45% parking is favourable compared to similar developments.

Overall trip generation is unlikely to increase significantly when comparing the existing 19 commercial parking spaces with the proposed 15 residential and 4 visitor spaces. Any increase during peak periods is expected to be minimal and not detrimental to the operation of the local highway network.

Cycle Parking:
Can the applicant provide a marked-up plan showing the provision of adequate secure cycle parking in accordance with LPG16. Adequate provision of cycle parking justifies any shortfalls in vehicular parking in sustainable locations.

Refuse collection:
Can the applicant please confirm intention for a private arrangement for refuse collection, given the access is private and there is no available space for refuse collection points within 15m of the adopted highway.

Construction Traffic Management Plan
Given the sizeable rear parking area, it is considered there is adequate space for deliveries and construction traffic if managed correctly. However, consideration should be given for an intensive use of the access and provision made with warning signs, calming, turning of vehicles within the compound area.
Completion of any rooftop or front elevation works over the highway should be coordinated with the LHA and approval sought
For these reasons the LHA request provision of a suitably worded condition requesting a Construction Traffic Management Plan that addresses the vehicle access concerns and the management of works affecting public areas.

ZJ10	**ACCESS APPROVED AS PART OF APPLICATION**
039R	Prior to first use of the development, the proposed vehicular access
E05NA	shall be laid out in strict accordance with approved plan no. @@@@.
	The visibility splays shall thereafter be permanently retained free of all
	obstruction in excess of 1 metre in height.

ZJ20 **PEDESTRIAN VISIBILITY SPLAY (FOOTWAY SAFETY)**
038R Prior to first use of the development hereby approved a pedestrian visibility splay shall be established measured from the centreline of the vehicular access 2.4 metres back from the back edge of the footway to points 3.3 metres either side measured along the back edge of the footway. Within these splays there shall be no obstruction in excess of 0.6 metres in height above the level of the adjoining highway. The splays shall thereafter be permanently retained clear of any such obstruction to visibility. (The suggested bollard is not considered a significant obstruction to visibility)

ZJ28 **PROVISION OF VEHICULAR CYCLE PARKING FACILITIES**
028R Prior to first use of the development on-site vehicular and cycle parking facilities shall be provided in strict accordance with a scheme which has been submitted to and approved in writing by the Local Planning Authority. The facilities shall thereafter be permanently retained and kept free of any obstruction and made available solely for the parking of vehicles and cycles.

ZJ37 **SUBMISSION OF FURTHER DETAILS (ACCESS IMPROVEMENTS)**
026R
E06N
E07N No part of the development shall commence until a scheme detailing the construction of the following has been submitted to and approved in writing by the Local Planning Authority: ***delete as appt ****

1) *Improvements to restrict unauthorised parking along the private shared access, that may result in traffic backing up onto the road, obstructing both vehicle users and pedestrian.*
2) *Improvements for pedestrian safety across the vehicular entrance (bollard and contrasting surface)*

The scheme as is approved shall be fully implemented prior to first use of the development.

ZJ45 026R	**CONSTRUCTION TRAFFIC MANAGEMENT PLAN** 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.

KWEdwards

Contracts & Engineering Manager

On behalf of Chief Officer, Environment & Technical

Appendix

Highways Development Control Standard Advisory Note

In the interests of maintaining highway safety, and to avoid obstruction of the public highway (in contravention of the Highways Act), The Applicant is advised to coordinate with the highway authority at highwayroadworks@wrexham.gov.uk in advance of commencement of the development/works with respect to:

1. *Skip, scaffolding, hoarding or A frame/signage (Permit required for these items, if on the public highway);*
2. *Use of a parking space for a set down/delivery area;*
3. *Record a dilapidation survey of the adjacent carriageway prior to commencement (to avoid being ask to repair damage by the Applicant whilst carrying out their works);*
4. *If any lane closure or obstruction of the highway is required for a crane or similar;*
5. *Protection against dust and debris blowing onto the public highway*
6. *Construction traffic parking locally avoiding nuisance to others;*
7. *If the Applicant's scope of work includes new apparatus in the highway, such as new mains services then a Section 50 licence will be required. Insurances and demonstration of competency to carry out works in the public highway will be required.*
8. *Lowering of kerbs or minor pavement alterations require Section 184/171 agreement. Insurances and demonstration of competency to carry out works in the public highway will be required.*
9. *A section 278 agreement works agreement is required for more significant alterations to the existing highway*
10. *Any temporary works affecting traffic lights, [pedestrian/cycle road crossings, or bus stops require pre-planning and permits;*
11. *For applications with a private driveway (either existing or proposed) connecting onto the public highway, the following conditions of approval apply:*

    - *No surface water from the applicants site should be allowed to drain onto the public highway,*
    - *The first 5m* minimum (for residential property) should be hard paved, avoiding gravel or loose chippings form spreading.*
    - *No gate should be built in a location where it would result in a car obstructing the highway whilst being unlocked, and it should not swing out and over a pavement or any other part of the highway.*

    **The hard paved length and set back if required is subject to the applicants proposed vehicular length*

The applicants should allow a minimum of 4 weeks' notice for any of the above standard requirements, and 6-8 weeks for lane closures & road closures (lead times may change without notice subject to workload and complexity). Any works involving Trunk roads should be coordinated separately and directly with the North & Mid Wales trunk Road Agency. For larger sites with a significant impact upon the highway, a Construction Traffic Management Plan will be required.