

MEMORANDUM



From:	Chief Officer, Environment & Technical	To:	Chief Officer Economy & Planning
		FAO:	Philip Mullineux
Our Ref:	ET/DC/AC/P/2023/0050	Your Ref:	P/2023/0050
Date:	25 th March 2026		

TOWN AND COUNTRY PLANNING ACT 1990

PROPOSAL: DATBLYGIAD PRESWYL O 85 ANNEDD AC ISADEILEDD CYSYLLTIEDIG / RESIDENTIAL DEVELOPMENT OF 85 NO. DWELLINGS AND ASSOCIATED INFRASTRUCTURE

LOCATION: LAND AT STANSTY FIELDS MOLD ROAD WREXHAM LL11 4AX
Grid Ref: E 332242.3 N 352545.8

In refer to your consultation in respect of the above. The Local Highway Authority (LHA) have reviewed the following information when considering the impact of this application from a highway perspective.

- **SCP Transport Statement Dated 19/11/2025 (Ref: LB/220743/TS/3)**

The Transport Statement (TS) is a revision of a previous TS submitted to the LHA in February 2023. The LHA in response, requested additional information and further assessment be undertaken. This consultation response references sections of the previous LHA response where appropriate.

Proposals

It is the LHA understanding that the proposals are a full application for the development of 83 dwellings and associated infrastructure. New roads are to be provided within the site alongside car parking provision. Access will be via a new priority junction located on Mold Road.

The proposals plan show the following types of dwellings will be provided:

- 2 no of 2 Bed Bungalows
- 12 no of 1 Bed Flats
- 37 no of 2 Bed Semi-detached Houses
- 22 no of 3 Bed, 2 Storey Houses
- 10 no of 4 Bed, 2 Storey Houses

The TS states that all housing on the site will be affordable.

Site Access and Visibility Splay

The proposed site access is onto Mold Road. The proposed access arrangement is shown on SCP/220743/SK01 in Appendix C of the TS and is a priority junction, with Mold Road as the major arm, and the site access as a 5.5m carriageway with 3m shared footway/cycleway at the junction

(which drops to a 2m footway within the site. A separate right turn pocket is provided to accommodate vehicles turning out of the site.

At the point of the proposed site access, Mold Road is a 50mph classified road with a central reservation, and a shared footway/cycleway along the eastern side. It is effectively therefore one-way on the nearside carriageway (southbound). As such, the visibility splay is only required looking to the north (right side) out of the site. The visibility splay shown on drawing SCP/220743/SK01 is 4.5m X 158m. It is noted that the 'Y' distance is drawn to the midpoint of the exit lane on the St Giles Park / Mold Road Roundabout rather than the nearside kerbline. The commensurate 'Y' distance would extend beyond the upstream roundabout and therefore the LHA are satisfied that the appropriate 'Y' distance can be achieved.

In the previous response, the LHA requested a reduction in the speed limit. The applicant has since suggested that there is no technical justification for such a change. However, the LHA does not agree with the Transport Statement's conclusion that a reduction to 40mph in the vicinity of the site access is unjustified.

The delivery of this development, along with other committed sites nearby, will materially alter the character of the area, resulting in a more built-up environment. In addition, the proposals will introduce a new conflict point on the network in the form of the site access junction, which does not currently exist. The TS also acknowledges the potential for increased journeys by foot and by bicycle; this will intensify the use of Mold Road by vulnerable road users.

For these reasons, the LHA recommends that the applicant pursues a reduction in the speed limit to 40mph in the vicinity of the site access and sets out the proposed mechanism for delivering this change. Any required amendments to road markings, signage, and the associated Traffic Regulation Order would need to be undertaken at the developer's expense.

The site access is shown as allowing only right turns from the site access road. The access plan shows no right turn into the site. The LHA agree that the right turn into the site should not be permitted, but are concerned that the arrangement as shown may still offer the ability for a non-complying driver to make the right turn in. **A more self-enforcing configuration is therefore required to be demonstrated.**

Access Road Layout

As stated in the LHA consultation response in August 2024, the proposed access road layout is acceptable in principle. However, it was requested that the developer ensure a width of 5.5m is maintained throughout the length of the access roads alongside 2m wide footways (to both sides) where there are residential frontages. The site layout does not contain any dimensions, so it is not possible to confirm if this is the case. **A drawing showing the dimensions of the internal road network including turning heads should be provided.**

It was stated in the previous LHA response that some of the turning heads provided do not meet the WCBC standards and therefore should be amended to ensure vehicles, including Refuse Collection Vehicles (RCV) can turn safely within the site. It is recognised that the site layout plan has changed, however, no dimensions have been shown on the site layout drawings and therefore it is not possible to confirm if the turning heads are designed to standard. **The applicant should submit a drawing with the appropriate dimensions clearly shown so that these can be checked by the LHA.**

The swept path assessments provided in the TS clearly show the RCV over-running the footway in places. **This is unacceptable from a road safety perspective and is not considered safe.** The dimensions of the turning head and bends should be amended to ensure a refuse vehicle can turn without overrunning the footway.

The LHA has previously raised concerns regarding the proximity of the proposed private shared drive access to the main site entrance onto Mold Road, a classified road. The current layout places this access point within 15 metres of the junction, which is considered unacceptable on highway safety grounds. This requirement is supported by principles outlined in Manual for Streets (MfS), particularly

in Section 7 – Street Geometry, which emphasizes the need for adequate spacing between junctions and private accesses to:

- Minimise conflict between turning movements.
- Maintain clear visibility for all road users
- Ensure safe operation of the junction, especially on classified roads with higher traffic volumes.

While MfS does not prescribe a fixed minimum distance, the 20m minimum spacing ensures:

- Safe ingress and egress for vehicles
- Reduced risk of rear-end collisions or turning conflicts.
- Compliance with visibility splay requirements (e.g. 2.4m x 25m for internal junctions)

In this context, a suggested 20m setback is necessary to ensure the safe and efficient operation of the site access and to align with both national guidance and local highway design standards.

The updated site layout submitted with the TS has not addressed the LHA previous comments regarding the private shared drive within 15m of the main site access onto Mold Road which is a classified road. **As previously stated, this is not acceptable on highway safety grounds, and it should be set back to beyond 15m but a recommended 20m.**

Internal Site Junctions

There are a number of proposed internal site junctions. Commensurate visibility splays must be provided for all internal access junctions. It is noted that some internal access junctions have trees to one or both sides. It is requested that areas within the visibility splay must be free of items in excess of 600mm in height.

Internal Site Layout

Linked to the above, a plan showing the boundary treatment for all properties that border the internal road that is to be adopted, must be provided to ensure that any boundary treatment will not affect vehicular or pedestrian intervisibility.

Car Parking Provision

The Council's car parking standards are set out within Local Planning Guidance Note No 16. This LPG sets out that two parking spaces are required per 2-bedroom dwelling, three car parking spaces are required per 3- or 4-bedroom dwelling. As stated in LPG16, the council has no minimum parking requirements, however, in cases where the amount of parking provided is below the maximum the Council will need to be satisfied that this is appropriate for the levels of demand, without undermining requirements for inclusive access.

Garages are not counted as parking spaces unless they meet minimum internal dimensions of typically 2.7m x 5.5m.

The cycle parking standards set out in LPGN No 16 require space to be provided for at least two secure cycle parking spaces per dwelling. For those dwellings with communal gardens and without garages, cycle parking should be provided via safe and secure cycle parking areas.

The following comments are made with regards to plots where parking provision is below or exceeds the maximum standards:

- **Plots 1–2** are 4 bed, 2-storey dwellings with 2 parking spaces. The WCBC parking standards require 3 spaces. The current provision does not meet the standard and will need to be amended.
- **Plots 7** is a 3 bed, 2-storey dwelling with 2 parking spaces. The WCBC parking standards require 3 spaces. The current provision does not meet the standard and will need to be amended.
- **Plot 23** is a 3 bed, 2-storey dwelling with 2 parking spaces. The WCBC parking standards require 3 spaces. The current provision does not meet the standard and will need to be amended.

- **Plots 30–33** are 1 bed flats with 1 parking space. The WCBC parking standards require 1.5 spaces. The current provision does not meet the standard and will need to be amended.
- **Plot 34** is a 3 bed, 2-storey dwelling with 2 parking spaces. The WCBC parking standards require 3 spaces. The current provision does not meet the standard and will need to be amended.
- **Plot 38** is a 4 bed, 2-storey dwelling with 2 parking spaces. The WCBC parking standards require 3 spaces. The current provision does not meet the standard and will need to be amended.
- **Plot 43** is a 3 bed, 2-storey dwelling with 2 parking spaces. The WCBC parking standards require 3 spaces. The current provision does not meet the standard and will need to be amended.
- **Plot 46** is a 3 bed, 2-storey dwelling with 2 parking spaces. The WCBC parking standards require 3 spaces. The current provision does not meet the standard and will need to be amended.
- **Plots 48–51** are 1 bed flats with 1 parking space. The WCBC parking standards require 1.5 spaces. The current provision does not meet the standard and will need to be amended.
- **Plots 55–57** are 3 bed, 2-storey dwellings with 2 parking spaces. The WCBC parking standards require 3 spaces. The current provision does not meet the standard and will need to be amended.
- **Plot 58** is a 4 bed, 2-storey dwelling with 2 parking spaces. The WCBC parking standards require 3 spaces. The current provision does not meet the standard and will need to be amended.
- **Plot 59** is a 3 bed, 2-storey dwelling with 2 parking spaces. The WCBC parking standards require 3 spaces. The current provision does not meet the standard and will need to be amended.
- **Plot 60** is a 2-bed semi-detached dwelling with 3 parking spaces. The WCBC parking standards require 2 spaces. The current provision exceeds the standard and should be amended.
- **Plots 67–68** are 3 bed, 2-storey dwellings with 2 parking spaces. The WCBC parking standards require 3 spaces. The current provision does not meet the standard and will need to be amended.
- **Plots 76–79** are 1 bed flats with 1 parking space. The WCBC parking standards require 1.5 spaces. The current provision does not meet the standard and will need to be amended.
- **Plot 83** is a 3 bed, 2-storey dwelling with 2 parking spaces. The WCBC parking standards require 3 spaces. The current provision does not meet the standard and will need to be amended.

Active Travel

As stated in the previous LHA response, the applicant is required to demonstrate that this site is in a sustainable location. The TS acknowledges the need for active travel improvements but fails to deliver a comprehensive or policy-compliant response. The proposed improvements to the Mold Road crossing are limited in scope and the applicant has not met LHA's request for a continuous active travel link along Stansty Chain Road. The TS dismisses this route due to ecological and space constraints but does not explore alternative alignments or mitigation. **Engagement with WCBC's Active Travel Lead is therefore strongly recommended.**

Mold Road presents a significant severance issue for both east–west and southbound pedestrian and cycle movements. The LHA welcomes that the applicant has acknowledged that improvements to the crossing on Mold Road are required and are necessary, but the proposed mitigation strategy which comprises tactile paving only, is not considered adequate on a road which has a 50mph speed limit and in excess of 2,000 two-way PCU movements during peak hours - as stated in Table 2.1 of the TS. The LHA considers this mitigation to be inappropriate given the traffic conditions and that the absence of a designated safe crossing point will result in key desire lines and destinations such as the bus stops on Old Mold Road being inaccessible for vulnerable road users such as children and individuals with visual impairments or those with limited mobility. The lack of footway provision on the eastern side of Mold Road further restricts safe access to destinations to the south – which may offer an alternative to Stansty Chain Road. The TS states that the footway on the western side of the road

could be used, however without a safe crossing point, destinations on the western side of Mold Road cannot be classed as being accessible.

In line with Welsh Active Travel Guidance, the LHA would recommend that a signal-controlled crossing be provided at this location to ensure safe and inclusive access for active travel modes. If this is not provided, the site cannot be considered to have safe pedestrian or cycle access or accessible for those residents wishing to access local bus services.

Drainage

The eastern end of the site sits within a known boggy / waterlogged ground close to the a watercourse, therefore the LHA would remind the applicant that if our flood concerns aren't resolved satisfactorily within the design of the scheme, then WCBC may decline adoption of the proposed highway within the site.

Refuse Collections

As stated previously, **bin collection and storage locations should be added to the site layout plan.** The WCBC Waste Management team do not reverse vehicles further than 12m and operatives will walk no further than 15m to collect a bin, and it is considered that 15m is the maximum distance a resident should walk to move a bin. The Waste Management team may choose not to access private roads.

Landscaping

There are areas of landscaping shown within the site, the LHA requests confirmation that a management company will maintain all landscaping within the site and within the required visibility splays.

Trip Generation and Highway Impact

The Transport Statement (TS) provides a trip generation and highway impact assessment based on TRICS-derived trip rates and historic traffic flow data. While the methodology is broadly acceptable, there are several areas where the assessment needs to be strengthened to ensure full compliance with current best practice and to reflect up-to-date local conditions.

The TS relies on traffic flow data from 2020, sourced from a previous Transport Assessment for a nearby development (Griffiths Road, LPA Ref: P/2015/0790). This data predates the COVID-19 pandemic and may not accurately reflect current traffic conditions or post-pandemic travel behaviour, particularly given the changes in commuting patterns and modal shift observed in recent years. The absence of updated traffic counts is a significant limitation in the assessment, as it undermines confidence in the baseline conditions used to evaluate the development impact. To ensure the robustness and relevance of the analysis, the Local Highway Authority recommends that new traffic surveys be undertaken on the A541 Mold Road and Stansty Chain Road to provide an accurate and contemporary understanding of existing traffic volumes and network performance.

The use of the TRICS database is appropriate, and the filtering criteria (edge-of-town, privately owned houses, weekday surveys) are reasonable. However, Appendix H of the updated TA does not include the TRICS output. The data used within TRICS to generate the trip results has not been supplied and therefore is requested to ensure the data supplied is robust.

The directional distribution of trips, with 75% assumed to travel southbound toward Wrexham and the A483, is based on a comparable local development and is considered reasonable. However, the assessment would be strengthened by validating these assumptions through updated traffic counts.

The TS estimates that the proposed development will generate approximately 41 two-way vehicle movements during the AM peak hour and 37 during the PM peak hour. The TS concludes that this would equate to roughly one vehicle every 1–2 minutes with the projected increase in flow being no more than 2% in the AM peak and 1.8% in the PM peak. These figures fall within the range of normal daily variation. However, as stated above, the LHA requires an assessment to be undertaken using up to date traffic counts and therefore it is not possible at this time to have confidence in the highway impact assumptions set out in the TS.

Multi-modal Trip Generation

The applicant has undertaken a multimodal trip generation assessment as part of the TS, considering forecast movements by walking, cycling, and public transport. The submitted assessment quantifies the expected person-trips by these modes during the AM and PM peak hours.

- Pedestrian trips are forecast as **4 arrivals and 8 departures in the AM peak**, and **5 arrivals and 2 departures in the PM peak**.
- Cycling trips are forecast as **0 arrivals and 2 departures in the AM peak**, and **1 arrival and 1 departure in the PM peak**.
- Public transport trips are forecast as **0 arrivals and 4 departures in the AM peak**, and **2 arrivals and 0 departures in the PM peak**.

Given the forecast pedestrian, cycling, and public transport trips identified in Table 5.2, it remains essential that the applicant demonstrates the site is supported by safe, direct, and policy-compliant active travel connections. In this context, and noting the deficiencies set out above regarding Mold Road crossings, the lack of a continuous active travel link along Stansty Chain Road, and the absence of adequate mitigation to overcome severance, ensuring strong and direct connections to nearby bus stops, as well as to surrounding walking and cycling infrastructure, is paramount to encouraging trips by these modes.

Travel Plan

Should permission be granted, a planning condition requiring a full residential travel plan will be necessary.

Summary and Conclusion

While the Transport Statement attempts to address some of the LHA's previous comments, it fails to resolve key safety, accessibility, and design concerns. The proposal does not currently comply with: Manual for Streets, LPGN 16 (Parking Standards), Welsch Active Travel Guidance, or WCBC design expectations. The following areas of assessment should be assessed by the applicant in a concise technical not as opposed to resubmitting an amended Transport Statement:

Summary of Required Actions

- **Access and Visibility**
 - Provide mechanism for reducing the speed limit to 40mph near the site access, including Traffic Regulation Order and signage proposals.
- **Internal Site Layout**
 - Provide a dimensioned drawing of the internal road layout, including road widths and turning heads.
 - Amend turning head dimensions to ensure refuse vehicles can turn without overrunning footways.
 - Relocate the private shared drive access to be more than 15m from the main site access onto Mold Road.
- **Parking and Refuse**
 - Ensure all plots meet WMBC parking standards (1.5 spaces for 1 bed flat, 2 spaces for 2-bed, 3 spaces for 3- and 4-bed dwellings).
 - Provide secure cycle parking for each dwelling, including communal cycle storage where appropriate.
 - Add bin collection and storage locations to the site layout plan, ensuring compliance with WCBC Waste Management standards.
- **Active Travel**
 - Upgrade the Mold Road crossing to a signalised facility to ensure safe pedestrian and cycle access.
- **Transport Assessment**
 - Undertake new traffic surveys on A541 Mold Road and Stansty Chain Road to reflect current conditions.
 - Provide TRICS Outputs for review.
- **Travel Plan**

- Should permission be granted, a planning condition requiring a full residential travel plan will be necessary.
- **Drainage and Landscaping**
 - Confirm that a management company will maintain all landscaping, including areas within visibility splays.

Until the issues are fully addressed and the outstanding information is provided then the development should not be supported on transport or highway grounds

A handwritten signature in blue ink, appearing to read 'K. O'Neill', is positioned above the title.

Chief Officer, Environment & Technical