MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO:	Tyler Fox
Our Ref:	ET/DC/AC/P/2025/0453 Response 2	**Your Ref:**	P/2025/0453
Date:	08/06/2026		

TOWN AND COUNTRY PLANNING ACT 1990

PROPOSAL: FORMATION OF VEHICULAR ACCESS / FFURFIO MYNEDIAD I GERBYDAU

LOCATION: THE RACECOURSE, MOLD ROAD, WREXHAM, LL11 2AH

With reference to the above application, the Local Highways Authority (LHA) has reviewed the additional information submitted in support of the proposal for a formation of vehicular access at the Racecourse, Mold Road, Wrexham.

Development Proposals
The application form describes the proposal as the "formation of vehicular access". However, the amended drawings clearly indicate that the development now comprises a 4.8 m wide dropped kerb serving a formalised layout of six parking spaces, together with a defined internal turning and manoeuvring area.

In this context, the proposals are not considered to represent a simple access drop kerb improvement but rather the creation of a small off-street car park with regular vehicular use. This is a materially different form of development, introducing a more intensive use and a significantly greater interaction between vehicles, pedestrians, and the public highway.

Intensification of Development
The originally submitted scheme indicated provision for three parking spaces. The revised proposals now provide six spaces, representing a 100% increase in parking provision and associated vehicle movements than the previous submission.

This intensification materially increases the level of activity at the site and gives rise to additional highway safety concerns. The increase in vehicle numbers will result in a higher frequency of movements across the footway and through a single access point, increasing the likelihood of conflict between vehicles and pedestrians. Given the stadium frontage location, which experiences periods of high pedestrian activity even outside of event times, this is of particular concern.

Impact on Pedestrian Environment
The site is located on a prominent section of Mold Road which serves as an important pedestrian route, particularly in relation to the Racecourse Ground and surrounding uses. The introduction of a 6-space car park at this location would require vehicles to repeatedly cross the footway, eroding pedestrian priority and introducing additional points of conflict.

This is particularly concerning given the nature of the frontage, which functions as a key pedestrian corridor. The proposals would result in a more hostile pedestrian environment, contrary to principles of good design which seek to prioritise pedestrian movement and minimise vehicle dominance in such locations.

Layout and Manoeuvrability
The applicant asserts that vehicles will enter and exit the site in a forward gear; however, no swept path or vehicle tracking analysis has been submitted to substantiate this claim. The layout appears constrained, with parking bays at approximately 4.8 m in depth and limited internal manoeuvring space, served by a 4.8 m wide access in the form of a dropped kerb.

In the absence of tracking evidence, the LHA cannot be satisfied that vehicles will be able to manoeuvre safely within the site without excessive shunting or the need to reverse. There is a risk that vehicles may not be able to operate as intended, leading to unsafe manoeuvres either within the site or in close proximity to the highway.

This raises concerns regarding compliance with LPG16: Wrexham Parking Standards, which require parking layouts to provide adequate space for safe and convenient manoeuvring and to function effectively by design.

The applicant has indicated that the parking area will not be used during match or event days. Whilst this is noted, such controls do not address the fundamental design limitations of the proposal. The layout must be capable of operating safely under normal day-to-day conditions, and reliance on management measures does not overcome deficiencies in geometry or functionality.

Impact on Active Travel Corridor – Mold Road (Phase 3)
A key and overriding concern relates to the impact of the proposal on the Mold Road Active Travel corridor, which forms part of the Phase 3 scheme. This corridor has been progressed through the WelTAG Stage 2 process and establishes a clear strategic intention to prioritise sustainable modes of transport along this route.

Concept design work for this section identifies a segregated, bi-directional cycle track along the northern side of Mold Road as the preferred option, together with cyclist-priority side road treatments and integrated bus stop infrastructure. Public consultation for the scheme was undertaken in October – November 2022.

Within this context, the introduction of a vehicular access (drop kerb) serving a 6-space parking area is fundamentally at odds with the objectives of the scheme. The proposal would introduce an additional crossing point over a future bi-directional cycle track, increasing the risk of vehicle/cycle conflict and undermining the continuity and safety of the route. The scale of the proposal, particularly the intensification to six spaces, compounds this issue by increasing the number of potential conflict movements.

In addition, the concept design indicates that this frontage forms part of a corridor where bus stop infrastructure is to be provided or enhanced. The introduction of a new access and parking arrangement in this location is likely to interact with or constrain these proposals and may necessitate the relocation or redesign of bus stop facilities. This would compromise the efficient and safe integration of public transport within the corridor.

Although detailed designs are not yet finalised, the strategic intent for this section of Mold Road is clear. The introduction of a new vehicular access serving a car park, despite a small one at this location risks prejudicing the delivery of a coherent Active Travel scheme by introducing an additional constraint within an already space-limited corridor.

Conclusion
The proposal is considered unacceptable for a number of reasons. It represents a material change in nature from a simple vehicular access which was originally proposed to the creation of a small car park. This intensification gives rise to increased vehicle movements, additional conflict with

pedestrians, and a reduction in the quality and safety of the pedestrian environment along this important frontage.

The layout remains constrained and unproven in the absence of vehicle tracking, raising concerns regarding safe operation and compliance with LPG16 Parking Standards. Most significantly, the proposal conflicts with the established strategic objectives for the Mold Road Phase 3 Active Travel corridor, including the delivery of a bi-directional cycle track and integrated bus stop infrastructure, and has the potential to prejudice the future implementation of these improvements.

Based on the above, the LHA cannot support the application and would recommend refusal.

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 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.