MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO:	Jenni Perkins
Our Ref:	ET/DC/PP/P/2026/0165 Res(2)	**Your Ref:**	P/2026/0165
Date:	11/06/2026		

TOWN AND COUNTRY PLANNING ACT 1990

PROPOSAL: CAIS AMLINELLOL AR GYFER CODI O HYD 34 ANNEDD (YMDDANGOSIAD, TIRLUNIO, CYNLLUN A GRADDFA) / OUTLINE APPLICATION FOR ERECTION OF UP TO 34 DWELLINGS (APPEARANCE, LANDSCAPING, LAYOUT AND SCALE RESERVED)

LOCATION: LAND AT BETHANIA ROAD, BETHANIA ROAD, ACREFAIR, WREXHAM

I refer to your consultation / email dated 01/06/2026 including revised Site Plan (Drg. No. R-1069-10 Rev F) in respect of the above.

General

It is the LHA's understanding that the proposals are for outline permission for the erection of 34 dwellings with appearance, landscaping, layout and scale reserved. The LHA's comments will therefore focus on the proposed access arrangements, however the LHA will also make advisory comments in relation to layout and parking provision.

Access

Bethania Road is a residential, unclassified road subject to a 20mph speed limit.
Sections of Bethania Road are narrow in nature and has significant lengths without footways which means that some pedestrian routes are far from ideal.

These sections of Bethania Road relate to:-

- The western side of the development site heading towards the Bethania Road / Chapel Street junction.

- The section located immediately east of the proposed development site over the former railway bridge.

- The section leading towards the junction of Bethania Road with the A539 Llangollen Road.

Based on typical speeds of 20mph, any proposed / existing access would require visibility splays of 2.4 x 25m in both directions measured to the nearside edge of the adjoining highway.

The proposed site plan (Drg. No. R-1069-10 Rev F) indicates a centrally located main access along with 2 no. private driveways directly accessing onto Bethania Road.

Proposed Main Access

Based on typical speeds of 20mph, any proposed / existing access would require visibility splays of 2.4 x 25m in both directions measured to the nearside edge of the adjoining highway in accordance with Manual for Streets.

The revised layout plan indicates splays of 2.4 x 22m measured to the nearside edge and to the centreline of the adjoining highway measured from a driver positioned at 2m off the access centreline which is incorrect. The required splays (2.4 x 25m in both directions- not 2.4 x 22m) need to be measured from the centreline of the proposed access to a point 25m along the kerbline in both directions. **The LHA recommends this detail is indicated on a revised layout plan.**

The proposed access indicated on the revised plan is 5.5m wide with 6m kerb radii and 2m wide footways either side of the estate road which is considered acceptable.

Appropriate dropped kerb crossing points (including tactiles) will be required across the main access serving the estate. **The LHA recommends this detail is indicated on a revised layout plan.**

The LHA recommends the provision of a 3m wide shared footway / cycleway along with appropriate dropped kerb / tactiles along the entire site frontage. The revised Site Plan does not indicate this detail. **The LHA recommends the applicant indicates this detail on a revised Site Plan (including annotated dimensions).** Appropriate dropped kerb crossing points (including tactiles) providing appropriate pedestrian / car intervisibility will be required across Bethania Road. **The LHA recommends this detail is indicated on a revised layout plan.**

There is an existing dropped kerb and utilities post located opposite no. 5 Bethania Road. The existing dropped kerb will require reinstating to full height footway construction where appropriate and the utilities post setting back to the back of new 3m wide shared footway / cycleway. **The LHA recommends this detail is indicated on a revised layout plan.**

The proposed estate road and footways will need to be constructed in accordance with WCBC Adoptable Standards.

<u>Road Markings</u>

The revised plan indicates road marking which are incorrect.
The LHA recommends road markings are provided in accordance with The Traffic Signs Regulations & General Directions 2022. **The LHA recommends this detail is indicated on a revised layout plan.**

Proposed 2 no. Private Driveways

Based on typical speeds of 20mph, any proposed / existing access would require visibility splays of 2.4 x 25m in both directions measured to the nearside edge of the adjoining highway in accordance with Manual for Streets. The proposed splays have not been indicated on the submitted site plan. **The LHA recommends the applicant provides a suitably scaled plan indicating the full extent of the proposed splays.**

All driveways shall be surfaced with hard bound materials and include an Aco drain or similar to intercept any private surface water run-off where the access falls towards the highway.

The works to construct the proposed new access and footway will require a s.38 / 278 agreement with the Council.

Potential Adoption of Estate Road

It is noted in the previously submitted correspondence that there is considerable contamination including waste materials present at the site along with a significant mining history ie/ mine workings, shafts etc.

Given the above, the LHA would not wish to adopt the proposed development and recommends that should the application be supported, a suitable condition is included which requires the proposed estate road and associated infrastructure to be managed in perpetuity by a private management company.

As indicated above, the works to construct the proposed new access and footway will require a s.38 / 278 agreement with the Council. The Council would only consider adopting the proposed access up to and including the proposed tactile crossing points just inside the access.

Traffic Generation (Technical Note – Dated 2023)

The submitted Transport Note provides details / information in relation to the highways implications of the proposals. This supplements a submitted Transport Statement – Dated January 2022.

It is noted that the TRICS data as part of the previous and current submissions is a little dated. The TRICS good practice guide states that surveys should have been taken during the last 8 years, whereas many were undertaken prior to 2018. Furthermore there is a survey undertaken in Ireland that should have been omitted from the data.

Nevertheless, it has previously been accepted that the trip rates and generation associated with the development is relatively modest and the previous assessment of 17 two-way trips in the peak hours is likely to be reasonable on the basis of a site with up to 34 number dwellings.

Site Layout (Reserved Matter)

Although a reserved a reserved matter, the LHA comment as follows:-

- The proposed turning head does not comply with the WCBC Standard Turning Head details. The proposed turning head will need to be modified to comply with the above standards.

- The proposed shared private driveway serving the proposed flats does not indicate appropriate visibility splays. Based on typical speeds of 20mph, any proposed access would require visibility splays of 2.4 x 25m in both directions measured to the nearside edge of the adjoining highway in accordance with Manual for Streets. The LHA recommends this detail is indicated on a revised layout plan.

- On the basis that the proposed development will be unadopted, the WCBC Waste / Recycling Section have confirmed they will enter the site with their waste / recycling vehicles providing the site is laid out to adoptable standards.

- The WCBC Waste / Recycling Section have recommended the provision of an area of hardstanding to the east of parking space no. 9 to facilitate the collection of the bins / recycling associated with the 10 no. flats. The latest Site Plan appears to have been amended adding space no. 10 to the east of space 9 rather than providing a bin collection

area close to the internal access road. This detail needs to be amended on a revised plan. The location of any proposed collection point shall not impede visibility from the private shared driveway onto the main estate road.

- The proposed shared driveway / access serving the 7 no. parking spaces plus 3 no mobility spaces does not have a turning facility for a medium sized delivery vehicle. The LHA recommend that the applicant provides a revised layout plan indicating a suitable turning head for a 7m long delivery vehicle.

- The submitted Technical Note (August 2023) includes a layout plan – PROW Scheme (Drg. No. 2233 001) which details a footway link from the proposed estate road turning head connecting to the existing public footpath (PROW No. 71 - Cefn) which provides a link to both Bethania Road to the north and A539 Llangollen Road to the south. This plan does not match the site layout plan submitted with this application ie/ this link is not shown. The LHA recommend that this detail is included on an amended site layout plan.
  The WCBC Public Rights of Way Section have advised that they would recommend this section of the proposed footway link is surfaced / upgraded with compacted aggregate to be approved by the PROW Section. The submission of such a scheme / detail could be included as a suitable planning condition.

  It is noted that the WCBC PROW Section do not require any lighting along this footpath.

  Please ask the applicant to liaise with our Public Rights of Way Section to discuss the proposed development. Please contact Mr. Sean Hanratty on Tel: 01978 729761.

Parking & Tuning Provision (Reserved Matter)

Although a reserved a reserved matter, the LHA comment as follows:-

Adequate parking & turning provision will be required in accordance with LPGN 16 requirements.

The submitted site plan indicates 2 car parking spaces per 2, 3 & 4 bedroom dwelling, and there is concern that in this location and with the design proposed that this could result in overflow or obstructive parking on pavements and roads within the site and on Bethania Road which could restrict access for refuse and emergency vehicles.

The provision of 10 spaces for the 10 one bed flats is considered acceptable along with the provision of 2 spaces per 2 bed dwelling. However, the LHA recommend the provision of 3 spaces for both 3 and 4 bed dwellings. The LHA recommends this detail is indicated on a revised layout plan.

Plots 17 (4 bed) & 18 (2 bed) include garage parking which is unacceptable (garage spaces are not included as parking provision in LPGN 16). An open car port in lieu of a garage would be considered acceptable. The LHA recommends this detail is addressed.

Plots 10 & 11 have parking spaces which involve reversing headlong down the proposed footway which is unacceptable. The LHA recommends this detail is addressed.

Each single driveway shall be a minimum of 3.2m wide and each double driveway shall be a minimum of 5.6m wide. This is not indicated on all of the proposed driveways. The LHA recommends that this detail is indicated on all proposed driveways (including annotated dimensions).

Electric vehicle charging points would be welcomed for all dwellings.

Cycle Parking / Storage (Reserved Matter)

Adequate cycle parking / storage will be required in accordance with LPGN 16 / Active Travel Guidance. The LHA recommend the applicant liaises with our Active Travel Section in this detail. The above provision could be included as a planning condition.

Active Travel

Bethania Road forms part of a planned Wrexham Active Travel Network route Wrex-Cefn-SUP0012. It is planned to upgrade the route to provide improved facilities for pedestrians and cyclists. The form this will take is unsure at the moment, however, it may be that Bethania Road becomes one way, and a contra-flow cycle is installed alongside improved pedestrian paths. Therefore the LHA would request that should the LPA be minded to grant the application, a Section 106 contribution towards these future works should be provided by the developer.

Furthermore, the provision of a shared cycle / footway of 3m width on Bethania Road along the site frontage would be welcomed to ensure that adequate facilities are provided along the site frontage.

Whilst the addition of a link to Footpath 71 in the Highways Technical Note is a valuable addition for walking, it is considered that the route as it is, may not be an attractive prospect due to the route through woodland and potentially uneven surfaces, the improvement of this route would provide valuable access to the public transport stops on Llangollen Road. It is noted within the Highway Technical note that a pedestrian link from the development to Llangollen Road is proposed utilising the existing public right of way. The applicant has stated that this would be at least 2m wide and would contain a hardened and sealed surface within the limits of the development site. Whilst the LHA welcomes this access route further information is required in regards to the levels and gradient of the proposed route, the accessibility of the route should be considered carefully. The applicant has stated that they proposed to improve the existing footpath 71 and that the level of improvements would be agreed with the Councils PROW officer and would include an improved compacted stone surface and low-level lighting if considered to be appropriate by the Council.

The submitted Technical Note (August 2023) includes a layout plan – PROW Scheme (Drg. No. 2233 001) which details a footway link from the proposed estate road turning head connecting to the existing public footpath (PROW No. 71 - Cefn) which provides a link to both Bethania Road to the north and A539 Llangollen Road to the south. This plan does not match the site layout plan submitted with this application ie/ this link is not shown. The LHA recommend that this detail is included on an amended site layout plan.

The WCBC Public Rights of Way Section have advised that they would recommend this section of the proposed footway link is surfaced / upgraded with compacted aggregate to be approved by the PROW Section. The submission of such a scheme / detail could be included as a suitable planning condition.

Whilst the existing infrastructure on Bethania Road for pedestrians and cycling is limited, it must be noted that there were previous appeals on the site and the inspector ruled that whilst the lack of a continuous footway could discourage residents from walking to nearby facilities, that they witnessed pedestrians seeking refuge on paved areas outside the flow of traffic successfully and did not uphold the dismissal on pedestrian safety grounds.

Waste / Recycling

It is important that any proposed bin store / compound is of adequate size / design to accommodate the required number / type of bins and is suitably located to serve such a development ie/ in close proximity to the adjoining highway. The LHA strongly recommend that you consult with our Senior Waste Strategy Officer Gabrielle Povey (Senior Waste Strategy Officer) on 01978 729640 to discuss the above detail and the adequacy of any area allocated to waste collection.

Despite the proposed development remaining unadopted, the WCBC Waste / Recycling Section have confirmed they will enter the site with their waste / recycling vehicles providing the site is laid out to adoptable standards.

The WCBC Waste / Recycling Section have recommended the provision of an area of hardstanding to the east of parking space no. 9 to facilitate the collection of the bins / recycling associated with the 10 no. flats. The latest Site Plan appears to have been amended adding space no. 10 to the east of space 9 rather than providing a bin collection area close to the internal access road. This detail needs to be amended on a revised plan. The location of any proposed collection point shall not impede visibility from the private shared driveway onto the main estate road.

Construction Traffic Management Plan (CTMP)

If the application is supported, the LHA recommend any permission includes a suitable 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..

Conclusion

In conclusion, the LHA have no objections in principle to the development and recommends the applicant submits the following information (access only) :-

- **Proposed Main Access**

  Based on typical speeds of 20mph, any proposed / existing access would require visibility splays of 2.4 x 25m in both directions measured to the nearside edge of the adjoining highway in accordance with Manual for Streets.

  The revised layout plan indicates splays of 2.4 x 22m measured to the nearside edge and to the centreline of the adjoining highway measured from a driver positioned at 2m off the access centreline which is incorrect. The required splays (2.4 x 25m in both directions- not 22m) need to be measured from the centreline of the proposed access to a point 25m along the kerbline in both directions. **The LHA recommends this detail is indicated on a revised layout plan.**

  The proposed access indicated on the revised plan is 5.5m wide with 6m kerb radii and 2m wide footways either side of the estate road which is considered acceptable.

  Appropriate dropped kerb crossing points (including tactiles) will be required across the main access serving the estate. **The LHA recommends this detail is indicated on a revised layout plan.**

The LHA recommends the provision of a 3m wide shared footway / cycleway along with appropriate dropped kerb / tactiles along the entire site frontage. The revised Site Plan does not indicate this detail. **The LHA recommends the applicant indicates this detail on a revised Site Plan (including annotated dimensions).** Appropriate dropped kerb crossing points (including tactiles) providing appropriate pedestrian / car intervisibility will be required across Bethania Road. **The LHA recommends this detail is indicated on a revised layout plan.**

There is an existing dropped kerb and utilities post located opposite no. 5 Bethania Road. The existing dropped kerb will require reinstating to full height footway construction where appropriate and the utilities post setting back to the back of new 3m wide shared footway / cycleway. **The LHA recommends this detail is indicated on a revised layout plan.**

The proposed estate road and footways will need to be constructed in accordance with WCBC Adoptable Standards.

Road Markings

The revised plan indicates road marking which are incorrect.
The LHA recommends road markings in accordance with The Traffic Signs Regulations & General Directions 2022. **The LHA recommends this detail is indicated on a revised layout plan.**

- **Proposed 2 no. Private Driveways**

Based on typical speeds of 20mph, any proposed / existing access would require visibility splays of 2.4 x 25m in both directions measured to the nearside edge of the adjoining highway in accordance with Manual for Streets. The proposed splays have not been indicated on the submitted site plan. **The LHA recommends the applicant provides a suitably scaled plan indicating the full extent of the proposed splays.**

Supplementary Notes

The applicant's attention should be drawn to item nos. 1, 2, 3, 4 & 5 of the supplementary notes.

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.

KW Edwards
Contracts & Engineering Manager
On behalf of Chief Officer, Environment & Technical