MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO:	Matthew Phillips
Our Ref:	ET/DC/AO/P/2025/0598/Res2	**Your Ref:**	P/2025/0598
Date:	21/07/26		

Town and Country Planning Act, 1990

Proposal: Materion A Gadwyd Yn ÔI Yn Dilyn Caniatâd Cais Amlinellol P/2019/0923 (Ymddangosiad, Tirlunio, Cynllun A Graddfa) – Codi 196 Annedd (Cyfnod 1) / Reserved Matters Persuant To Outline Planning Permission P/2019/0923 (Appearance, Landscaping, Layout And Scale) – Erection Of 196 Dwellings (Phase 2)
Location: Land Either Side of Stansty Chain Road Off A483 Trunk Road and A541 Mold Road Stansty Wrexham LL11 4YF

The Local Highway Authority (LHA) understands that this Reserved Matters Application relates to Conditions 1, 2, 3, 4, 5, 6, 7, 19 as set by the Outline Planning Permission P/2019/0923.

Following initial LHA comments being issued in November 2025, the applicant has submitted further information on the site layout and parking provision.

Site Layout:
Across the site a number of long shared private driveways are shown. A number of these appear to exceed the maximum drag distances for refuse collection – for instance the driveway for plot 275. Clarification is required on how refuse collections for such locations will be managed, given WCBC refuse collection vehicles (RCVs) cannot be expected to enter private drives.

A number of streets are shown with only a single footway to one side. Footways are required to both sides of the carriageway for pedestrian amenity and safety, particularly where they serve a large number of properties. Similarly, no footway is shown to the northwest side of the POS where children might be expected to walk to / from.

Also as noted in previous comments, in several locations the carriageway width narrows. This appears to contribute to the manoeuvring difficulties for the HGV. For the avoidance of doubt, it would be helpful if the dimensions of carriageways could be marked on the plan.

Plots 284 to 286 are served off a shared private driveway. The access to this driveway appears to cross the footway and a verge strip with no cross-over shown. This is also directly opposite the footway to the LEAP and would conflict with likely pedestrian crossing movements. Notwithstanding this the driveway is too close to the main junction and should be a minimum of 20m set back.

Plots 250 and 319 would appear to have no provision for vehicles to turn on leaving the parking spaces and would require vehicles to reverse some distance to reach a turning opportunity.

As mentioned in discussions with the applicant, the inclusion of grass verges at kerb side with the footway behind and then driveway, raises concerns over the possibility of vehicles blocking the footway. The LHA would encourage an alternative layout in these instances (e.g. Plot 299 to 302).

Adjacent to plot 326 the footway does not align with the upgraded PRoW to the opposite side of the road. These should be in line.

Parking Provision:
As noted previously, where driveways are proposed with a side-by-side layout, the driveways must allow width for pedestrian access as well as parked vehicles. Assuming that where shown individual spaces are 2.5m wide, this would mean most of the driveways are only wide enough for parking, not pedestrian access. In such cases a width of 3.1m should be assumed for one of the parking spaces to allow for this pedestrian access, or alternative pedestrian access shown.

As noted in the previous LHA responses, the apparent under-provision of off-street parking spaces was a concern, given the number of larger properties without the requisite provision. In this regard the applicant has submitted a Technical Note (TN) which addresses parking.

Table 2 of this TN summarises proposed parking provision by house type. This table identifies that there will be a 126 shortfall in provision against the maximum standard – therefore a provision of c.75%. The TN sets out a justification for this under-provision. One theme of this justification is that if garages are including in the parking total, this would address the shortfall for three and four bedroom houses. As the TN states in section 1.5, the Councils LPGN 16 Parking Standards clearly state that garages will not be counted as contributing to on-site provision. The TN states that proposed garages will be of suitable size to store vehicles, but no details or dimensions have been provided. However, notwithstanding this, the size of garages is only one of the reasons garages are not counted. The other, which is independent of dimensions, is that use of garages to park is not predictable or controllable either from a convenience perspective or from the possibility of residents using garages for other purposes (storage for instance). There is therefore no ability or certainty that garages will be available for vehicles (even if of suitable size) and garages cannot be counted towards off-street provision. Notwithstanding this is, it is noted that not all three / four bedroom houses have garages anyway.

The TN also suggests that the affordable housing component of the scheme would have lower car ownership and trip generation than the wider conventional development, citing young professionals who face financial constraints. Notwithstanding the validity of this, the smaller affordable housing plots (which this theoretical situation would apply to) as shown in the breakdown in Table 2, have very limited shortfall in provision. The greater shortfall is for the larger affordable, but particularly private housing types, which are unlikely to be occupied by young professionals with financial constraints.

The TN then sets out a detail analysis of census data for the local area to outline existing car ownership patterns. Whilst the LHA are aware this approach has been used elsewhere to justify parking provision, this is very much a site specific matter and cannot be applied without consideration of the specific details of the site layout or of the location in question. There is no certainty that existing patterns will be replicated in a new settlement, which could include local people moving in but is unlikely to be exclusively local residents and consistent with local trends. Furthermore, the specific details of the area referenced in the TN (Gwersyllt South – W05001736) show factors which reduce the reliability of the data. Gwersyllt South comprises a number of Lower Super Output Areas (LSOAs), one of these, and the largest in physical area of the LSOAs, (W00010028) is predominantly agricultural with little housing. This LSOA has only c.60 dwellings within it, of which over half the properties appear to be flats or sheltered accommodation. Therefore any *houses* with lower car ownership would then skew the resulting house based car ownership figure.

If the shortfall in provision were less significant, use of historic local data, could be a reasonable argument, but given the c.25% shortfall this is not suitable. To reiterate the point set out in the initial

LHA response, development will not be permitted if there is insufficient parking on site and where, as result this could cause or increase highway problems.

The layout of the site means that for serval areas the presence of multiple driveways, long runs of dropped kerbs or junctions, there is limited opportunity to park on-street without causing safety or operational issues. This and comments in the following section on submitted swept-paths further highlight the need for sufficient off-street parking.

Swept-path Assessments
Of particular relevance to the concern over parking proposals, the TN also includes the requested swept-path analysis for the internal area, for a Refuse Collection Vehicle (RCV).

Whilst it is accepted that RCV collections will be infrequent, the swept-path assessments show wide-spread instances of the RCV encroaching onto footways to complete turns in turning heads or to complete turns through junctions.

The turning heads adjacent to plots 193, 200, 228, 239, 262 show examples of the RCV over-running the footway to complete movements, but other examples can be seen. Given the potential conflict this creates with pedestrians, this is not acceptable, particularly where the over-run locations are near the play areas or PRoWs. For the avoidance of doubt, over-run by any part of the vehicle is still considered a road safety issue, even if the vehicles tyres remain in carriageway.

At the access to this site on Stansty Chain Road, the RCV is shown as taking the full road width on turning into or out of the site. Oncoming vehicles may not have sufficient forward visibility of this and this could represent a road safety issue. The access junction should be amended to achieve a better arrangement.

The drawings show a number of blue lines which according to the key are proposed carriageway widening. In places it is unclear what is proposed – for instance adjacent to plot 262, it appears the back of the turning head is proposed to move back to accommodate the RCV. However, this would have the effect of reducing the depth of the parking bays, meaning these bays could not be counted towards the total. Notwithstanding this, the RCV encroaches further still into the parking bays.

There are several other locations where it appears that the RCV over-runs the kerb, but this may be a result of the line thickness used. It would be helpful if the overall drawing could be revised with thinner line widths.

The swept-paths of the RCV demonstrate that throughout much of the site there is very little ability for vehicles to park on-street without causing operational issues or conflict with an RCV.

Summary
A number of points have been identified that require further information and/or clarification to be provided before the Local Highway Authority can make a judgement on the application.

KWEdwards

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