MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO:	Matthew Phillips
Our Ref:	ET/DC/AO/P/2025/0597/Res2	**Your Ref:**	P/2025/0597
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 1)
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 plots 159 to 163. 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.

Plots 14 and 172 both have remote parking provision, which increases the chances of on-street parking. Both plots are located on a bend and adjacent to a junction and as the swept-paths indicate, an RCV would not be able to make the turn from the adjacent junction if vehicles were parked on carriageway at these points. A more practical solution is required here.

Plots 72 to 76, 43 to 49 and 136 to 143 have no footway (as noted previously). Footways are required to both sides of the carriageway for pedestrian amenity and safety.

For plots 1 to 4, the access to the shared private driveway is within the junction area of the signal controlled junction and may cause operational issues, or be difficult to access/egress should a queue build back from the junction. It is suggested these plots be ‘flipped’ so that the driveway is adjacent to plot 5.

At the first internal junction between plots 60 and 22, an area of soft landscaping is proposed on the radius of the junction which appears to have trees within. These may obstruct visibility for drivers on the side road looking to their right. If landscaping is proposed, it must be low-level and below 600mm in height. The LHA’s preference would be for this to be relocated away from the junction mouth.

Plot 60's driveway would sit partially within the give-way area of the adjacent side road junction and depending on height of boundary treatment may make visibility to oncoming pedestrians and/or vehicles difficult.

Plots 61 and 62 are very close to the junction area (with Mold Road) and should queuing build back from the junction, be difficult to access / egress.

A number of properties on shared private driveways have very restricted manoeuvring space and it is unclear if it would be possible to reverse out. For example plots 140, 147.

As noted previously, for Plots 30 to 44 it appears that remote parking is proposed, with these plots provided with no direct off-street provision, instead relying on a parking area. From experience the LHA would not welcome such a proposal as this often leads to residents parking outside their property blocking the footway, rather than walk to/from the remote parking area. As shown in the swept-path assessments, for an RCV to make the turn into this area it will requires the full carriageway width and any vehicles parked along the kerb or the footway would prevent the RCV gaining access. In this instance and having seen the swept-path, the LHA cannot accept this layout for this area as it would not be practical or efficient.

Also as noted in previous comments, the carriageway width on the street adjacent to plots 51/52 narrows. This appears to contribute to the manoeuvring difficulties for the HGV. This carriageway narrowing occurs elsewhere on the site. For the avoidance of doubt, it would be helpful if the dimensions of carriageways could be marked on the plan.

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.

Further to the above, it appears that in some locations the parking spaces shown outside properties are not of the correct dimension and appear too short – for example Plots 27, 28, 51, 52, 55, 56,115. Parking spaces that do not meet the minimum dimensions cannot be counted toward provision. In these cases there is also a risk that a vehicle parked in these locations could project into the footway, impacting on pedestrian amenity and safety.

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, however 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 therefore cannot be counted towards off-street provision. Notwithstanding this is, it is noted that not all three / four bedroom houses have garages.

The TN also suggests that the affordable housing component of the scheme would have lower car ownership and trip generation than the wider development, citing young professionals who face financial constraints as typical occupants. 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 no shortfall in provision. The 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 may 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 and the approach. 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 several 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 37, 40, 68, 86, 144, show examples of the RCV over-running the footway to complete movements, but many 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. 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.

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 plots 280/281 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 is still showing as encroaching into these bays to complete its turn. A similar issue exists at plots 144/145. Adjacent to plots 42 and 43 the RCV is shown as encroaching over the front step of the houses, coming within less than 0.5m of the front wall of the house. These movements are not acceptable.

For a number of internal junctions (as distinct to RCVs at turning heads) the swept-paths show the RCV over-running the footway when turning through the junction. This is not acceptable from a pedestrian safety point of view. For instance adjacent to plots 22, 28/29, 72, 153 172, 179 and at the access junction onto Stansty Chain Road.

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.

Also, for a number of internal junctions, swept-paths are only shown for one direction (e.g. only left out / left in). As this phase of the site has two access points it is possible that an RCV could come from either direction. Accordingly, swept-paths will be required for all movements at internal junctions.

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.

At the site access junction on to Mold Road, it appears a left turning RCV (from the site into Mold Road) would encroach into the off-side lane to complete the turn. A right turning RCV into Mold Road appears to have to make an non-standard left 'jink' to complete the right turn which then conflicts with the near-side lane. If this reverse movement is necessary to enable a HGV to make this turn it would be of concern, as it is unlikely this would be apparent to drivers unfamiliar with the site. An RCV turning left into the site also appears to encroach into the offside lane. Given the line thickness it is unclear but an RCV turning left into the site appears to over-run the pedestrian refuge island. Given this is a new junction, free of constraints, there is no reason why more suitable, conflict free swept-paths cannot be achieved

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