MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO:	Dafydd Thomas
Our Ref:	ET/DC/AC/P/2024/1692 Response 3	**Your Ref:**	P/2024/1692
Date:	05/08/2026		

TOWN AND COUNTRY PLANNING ACT 1990

PROPOSAL: DEMOLITION OF ENGEDI CHAPEL AND BRYMBO METHODIST CHURCH AND ERECTION OF 16 APARTMENTS / DYMCHWEL CAPEL ENGEDI AC EGLWYS METHODISTAIDD BRYMBO A CHODI 16 O FFLATIAU

LOCATION: ENGEDI CHAPEL AND BRYMBO METHODIST CHURCH, HIGH STREET, BRYMBO, WREXHAM, LL11 5BL

With reference to the above planning application.

The proposed development comprises the demolition of an existing church and the erection of an apartment block comprising 16 no. one bed apartments.

The Local Highway Authority (LHA) has previously provided comments on the application in Memorandum Notes dated 07/04/2025 and 06/01/2025. In the latest comments provided by the LHA. In response to this, the applicant's transport consultant, Focus Transport Planning (FTP), has produced a technical note providing additional information (Ref J000488-HTN02 dated March 2026).

This Memorandum provides comment and feedback on the latest FTP technical note in the order presented in FTP's note.

POINT 1: CONFIRMATION OF SPEED SURVEY DATA
The Applicant has provided additional information regarding both the methodology and location of the speed survey undertaken on High Street. The survey was carried out manually in accordance with CA 185, with vehicle speeds recorded only in free-flow conditions.

The LHA accepts the Applicant's rationale for undertaking a manual speed survey rather than using ATC equipment. Given the narrow nature of High Street and the frequent give-and-take movements between opposing vehicles, ATC data would be likely to capture speeds influenced by vehicles slowing or stopping to pass one another and may therefore not be representative of free-flow conditions. In view of the site-specific characteristics, the LHA is satisfied that a manual survey represented an appropriate methodology for capturing free-flow vehicle speeds.

The Applicant has confirmed that surveys were undertaken on Thursday 12 September 2024 between 10:00-12:00 and 14:00-16:00, in accordance with the requirements of CA 185. The survey location has also been clarified, with speeds recorded for southbound vehicles passing properties 1 and 2 Gwalia.

With regard to sample size, whilst CA 185 advises that a minimum of 200 vehicle speeds should ideally be obtained during each measurement period, the LHA accepted that the ability of the Applicant to achieve this during the measurement periods is unlikely. Moreover, the LHA do recognise that High Street is a lightly trafficked and constrained in width which results in lower traffic speeds. In this instance, it is accepted that achieving the recommended sample size may not be practicable. Based on the additional information submitted, and noting the recorded 85th percentile speed of 20.5mph, the Local Highway Authority is satisfied that the survey has been undertaken using an appropriate methodology for the site constraints and that the resultant speed data can be relied upon for the purposes of assessing visibility requirements. This matter is therefore considered resolved, and no further information is required in relation to the speed survey.

POINT 2: CONFIRMATION OF EXISTING HIGH STREET VEHICULAR ACCESS
No further information is required in respect to this issue.

POINT 3: PROPOSED ACCESS OFF TAI OWAIN
The Applicant has submitted revised swept path tracking (Drawing J000488/ATR005C) in response to the LHA's previous comments regarding vehicle manoeuvring from the Tai Owain parking spaces. The revised drawing demonstrates that an estate car can enter and exit both parking spaces within the constraints of the site and adjacent highway.

Accordingly, this matter is considered resolved and no further information is required in relation to vehicle tracking or manoeuvring associated with the Tai Owain parking spaces.

POINT 4: PROPOSED ACCESS OFF HIGH STREET
The Applicant has provided a revised visibility drawing (FTP Drawing J000488/SK102B) in response to the LHA's request for further clarification of the visibility splay to the north of the proposed access off High Street. The drawing extends further north and illustrates the visibility splay measured to the centreline of the carriageway, consistent with the approach previously accepted by the LHA.

As set out under Point 1, the LHA is now satisfied with the speed survey methodology and accepts the recorded 85th percentile vehicle speed. Accordingly, the visibility requirements for the proposed access have been established on the basis of this accepted speed survey data and the corresponding visibility splay requirements.

The Applicant has also confirmed that the existing boundary wall on the northern side of the application site will be removed. However, upon review of Drawing J000488/SK102B, it appears that part of the boundary wall associated with 1 Gwalia remains within the required visibility splay. As such, it has not been satisfactorily demonstrated that the full visibility splay, as determined from the accepted speed survey data, can be achieved free from obstruction.

The presence of this wall within the visibility envelope is considered unacceptable, as it could impede the required intervisibility between emerging and approaching vehicles. The submitted drawing therefore does not provide sufficient evidence that the required visibility splay can be delivered and maintained in full.

The Applicant should provide a revised visibility drawing which clearly demonstrates that the required visibility splay can be achieved in full, based on the accepted speed survey results, free from obstruction and without reliance on visibility through or across any boundary feature. The drawing should clearly show the visibility splay measurement as drawn.

Accordingly, this matter remains unresolved pending receipt of revised drawings demonstrating that the required visibility splay is achievable.

POINT 5: PROPOSED FOOTWAY / CROSSING IMPROVEMENTS
The Applicant has provided the additional information requested by the LHA in relation to the proposed footway improvements, pedestrian crossing facilities, access gradients and emergency vehicle access arrangements.

The Applicant has confirmed that the proposed footway widening along High Street and Tai Owain will be provided entirely within the application site and will not require any widening into, or reduction of, the existing carriageway width. The LHA is satisfied with this clarification.

The Applicant has also confirmed that dropped kerbs and tactile paving will be provided on the opposite (southern) side of the High Street / Tai Owain junction, as shown on Creu Architects Drawing CREU-C484-006-P-PROPOSED SITE. This amendment is welcomed and is considered to provide an appropriate pedestrian crossing arrangement at the junction.

In relation to the undercroft access, the Applicant has clarified that the proposed gradient will be 1:24 for the first 10m behind the highway boundary, this is shown on the updated site plan (Creu Architects Drawing CREU-C484-006-P-PROPOSED SITE). The LHA is therefore satisfied that the previous discrepancy between the submitted drawings has been resolved.

The Applicant has provided confirmation from WCBC Building Control that there are no concerns regarding emergency service vehicle access to the development. The email is attached in Appendix NTN1 of the FTP Technical note. The LHA notes this confirmation.

POINT 6: PARKING AND TURNING PROVISION
No further information is required in respect to this issue.

POINT 7: CYCLE PARKING / STORAGE
The Applicant has revised the proposed cycle parking provision and now proposes 11 cycle parking spaces together with 1 cargo bike space, as shown on the latest submitted plans.

The LHA notes the Applicant's comments regarding their experience managing similar one-bedroom apartment developments and the observed levels of cycle ownership amongst residents. The Applicant has also stated that future monitoring of demand would be undertaken and that additional provision could be considered should a need arise.

However, the proposed provision falls significantly short of the requirements set out within LPGN16. The LHA has previously advised that, based on the scale of development proposed, a minimum provision of 32 secure cycle parking spaces would be required. Notwithstanding that the Applicant's previous submission proposed 21 cycle spaces, the current proposal has reduced this provision further to 11 cycle spaces and 1 cargo bike space, resulting in less than one cycle parking space per dwelling.

Whilst the Applicant's experience of similar developments is noted, no substantive evidence has been provided to justify a departure from the Council's standards in this instance. Furthermore, given the limited level of car parking proposed within the development, it is important that adequate cycle parking is provided to support sustainable travel choices and future demand.

The Applicant's suggestion that cycle parking demand can be monitored following occupation does not overcome the need to make appropriate provision as part of the development from the outset. Retrofitting additional cycle parking at a later date may not be straightforward and could be constrained by the final layout and available space.

Accordingly, the LHA remains of the view that cycle parking should be provided in accordance with LPGN16 standards unless robust evidence can be provided to justify a reduced provision. This matter therefore remains unresolved.

POINT 8: TURNING PROVISION – DELIVERY VEHICLES
The Applicant has provided further clarification regarding the proposed servicing and refuse collection arrangements.

The Applicant has confirmed that all bin stores serving the development will be located adjacent to Tai Owain, as shown on Creu Architects Drawing CREU-C484-006-P-PROPOSED SITE. The Applicant has further advised that refuse collection vehicles will access the bin stores via Tai Owain and that this arrangement has been reviewed and accepted by the WCBC Waste Strategy Officer.

The LHA notes the submitted correspondence from the WCBC Waste Strategy Officer which confirms that refuse collection vehicles currently reverse along the driveway serving the existing Tai Owain development and that the proposed development would be serviced as part of these existing collection arrangements. As such, the proposal would not introduce any change to the established refuse collection strategy or vehicle manoeuvring arrangements currently operating at the site.

Whilst the LHA's previous comments sought clarification regarding refuse collection and servicing arrangements, the information provided demonstrates that an existing and accepted refuse collection arrangement is already in place and that the proposed development can be accommodated within this arrangement.

Accordingly, the LHA is satisfied that adequate information has been provided regarding the refuse collection strategy and servicing arrangements for the development, and this matter is therefore considered resolved.

POINT 9: CAR PARKING MANAGEMENT PLAN
The Applicant has reiterated their position that a Car Parking Management Plan is not required, citing their experience of low car ownership levels at similar Wales & West Housing developments and advising that parking management measures have not been necessary at comparable sites.

Whilst the Applicant's comments are noted, the additional information requested by the LHA regarding parking demand and the operation of parking at similar developments has not been provided. As such, insufficient evidence has been submitted to demonstrate that parking demand associated with the proposed development will not exceed the level of parking provision proposed or result in overspill parking on the surrounding highway network.

The LHA remains concerned that the development proposes a constrained level of parking provision and considers it necessary, in the interests of maintaining the safe and efficient operation of the adjacent highway network, that appropriate parking management arrangements are established from the outset.

Accordingly, the LHA remains of the view that a Car Parking Management Plan is required. The submission of a suitably detailed Car Parking Management Plan should therefore be secured by planning condition and should include details of how parking spaces will be allocated, managed and monitored to minimise the potential for overspill parking onto the adjoining highway.
This matter therefore remains unresolved in the absence of either sufficient supporting evidence to justify the omission of a management plan or the Applicant's agreement to its submission via planning condition.

POINT 10: SWEPT PATH ASSESSMENT
The Applicant has submitted revised swept path tracking (FTP Drawing J000488/ATR005C) in response to the LHA's previous comments regarding manoeuvring from the northern Tai Owain parking space.

The revised tracking has been reviewed and demonstrates that an estate car can satisfactorily enter and exit the proposed parking spaces. The LHA notes that the submitted revisions have addressed the concerns previously raised regarding vehicle manoeuvring at this location.

Given the constrained nature of the site and the limited scale of the parking provision, the LHA is satisfied that the tracking assessment demonstrates an acceptable level of manoeuvrability for the design vehicle.

Accordingly, the LHA considers this matter to be resolved, and no further information is required in relation to the swept path assessment.

POINT 11: TRAFFIC GENERATION
No further information is required in respect to this issue.

SUMMARY
The LHA has reviewed the additional information submitted within FTP Technical Note J000488-HTN02 (March 2026) and considers that the majority of the previously raised highway matters have now been satisfactorily addressed.

However, two outstanding matters remain:

Proposed Access off High Street (Point 4) - Whilst the visibility requirements have now been established using the accepted speed survey data, the submitted visibility drawing does not clearly demonstrate that the required visibility splay to the north can be achieved free from obstruction. It appears that part of the boundary wall associated with 1 Gwalia remains within the required visibility envelope. A revised visibility drawing is therefore required which clearly demonstrates that the full visibility splay can be achieved and maintained.

Cycle Parking Provision (Point 7) - The proposed provision of 11 cycle spaces and 1 cargo bike space falls significantly below the minimum provision expected under LPGN16. The current submission represents a reduction from the previously proposed provision, and no robust evidence has been provided to justify a departure from the Council's standards. The LHA therefore remains of the view that cycle parking should be provided in accordance with LPGN16 or that a robust justification for any shortfall should be submitted.

In addition, whilst not considered a reason to delay determination of the application, the LHA continues to recommend that a Car Parking Management Plan be secured by planning condition to ensure the proposed parking provision is appropriately managed and to minimise the potential for overspill parking onto the surrounding highway network.

Based on the above, the LHA is unable to support the application until the outstanding concerns identified under Points 4 and 7 have been satisfactorily addressed.

KWEdwards

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

Conditions

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.