MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO::	Matthew.Phillips@wrexham.gov.uk
Our Ref:	ET/DC/MZ/P/2024/1296 Rev 1	**Your Ref:**	P/2024/1296
Date:	14/12/2024		

TOWN AND COUNTRY PLANNING ACT 1990

NEWID DEFNYDD Y TIR I DDARPARU 7 LLAIN AR GYFER SAFLE I SIPSIWN/TEITHWYR A CHODI ADEILAD CYMUNEDOL(RHANNOL ÔL-WEITHREDOL) / CHANGE OF USE OF LAND TO PROVIDE 7 NO. PITCHES FOR GYPSY/TRAVELLER SITE WITH ERECTION OF COMMUNAL BUILDING (PARTLY IN RETROSPECT)

LAND WEST OF THE BUNGALOW, HALTON, CHIRK, LL14 5BG

I refer to your consultation / email dated 06/08/2024 in respect of the above.

It is the LHA's understanding that the proposals are for a change of use of land to provide 7 no pitches for gypsy / traveler site with erection of communal building (partly in retrospect).

Site Location

The location of the site is on an unclassified highway that has a 60mph speed limit, therefore visibility splays of 2.4m x 215m are required in either direction at the site entrance with nothing higher than 1m within the visibility splay. The submitted plan indicates visibility of 2.4m x 70m in either direction which is below the requirements and it is considered that visibility to the west may be further restricted by the change in levels and due to the presence of a large hedge along the verge. There is also an extensive level distance from within the site to the site entrance which could restrict visibility further, this requires a thorough design and assessment on a topographical survey in the LHA's view. It is understood that an appeal has previously been made for a similar proposal on the site and surveys were undertaken in 2017 in relation to the site that demonstrated that visibility splays of 70m were adequate. In light of the fact that over 7 years have passed since the survey, it is considered that the provision of an updated survey would be required to demonstrate the 85th percentile speeds currently experienced in close proximity to the site entrance and for suitable visibility splays to be provided based on the results gleaned. Such a survey should be undertaken by an independent body.

The public highway in the vicinity of the site does not benefit from footways and on a site visit the LHA witnessed pedestrians walking within the highway. The Welsh Government states in TAN:18 point 3.3 that the location of new residential development has a significant influence on travel patterns as the majority of trips start or finish at home. Housing is also usually the most extensive land use in settlements. As a consequence, the relationship between homes and other land uses will influence travel demand in terms of mode of travel, length of journey and the potential for multi-

purpose trips. Therefore it should be a key aim of development plans to identify residential sites that are accessible to jobs, shops and services by modes other than the car. These proposals do not appear to fully accord with this stance and therefore reliance on the car is likely at this site. However, in Circular 005/2018 'Planning For Gypsy, Traveller and Showpeople Sites' by the Welsh Government paragraph 39 states that 'sites in the countryside, away from existing settlements can be considered for gypsy and traveller sites if there is a lack of suitable sustainable locations within or adjacent to existing settlement boundaries. In assessing the suitability of such sites, local authorities should be realistic about the availability, or likely availability, of alternatives to the car in accessing local services. Over rigid application of national or development plan policies that seek a reduction in car borne travel in order to effectively block proposals for any gypsy and traveller site in a countryside location would be inappropriate'.

Access

Due to the types of vehicles likely to service the site good quality roads which are capable of withstanding heavy vehicles should be constructed, normally concrete or tar macadam on a suitable sub base appropriate to soil conditions are preferable.

The road should be wide enough to allow mobile homes access via a low loader vehicle and yet not encourage on road parking. Swept paths are required to demonstrate a mobile home on a low loader can be delivered within the site should other pitches be occupied.

The proposed drawing shows an access road of 5m width which is considered acceptable for simultaneous access and egress.

The WCBC standards state that residents should not be required to move their waste further than 15m and WCBC operatives will only walk upto 15m to access waste bins, therefore the LHA would suggest a waste presentation point may be beneficial to ensure waste bins are presented for collection on the required day. The applicant must ensure the presentation point does not impede visibility splays at the site access.

The LHA noted on site that there was a level difference between the site and the public highway and requests clarification on the levels to ensure the access does not exceed the accepted maximum gradient for pedestrians of 1:12 on DDA grounds.

Parking

No details have been provided in relation to the proposed accommodation but it is considered that the two car parking spaces proposed per pitch would be adequate for the proposed use. Parking spaces of dimension 2.4m x 4.8m are required and of a suitable construction to ensure that they can be used at all times of the year. All seven pitches are indicated with two car parking spaces each and there are a further five car parking spaces proposed infront of the amenity building. There are no disabled car parking spaces proposed.

Amenity Block Access

It is noted that the amenity block is already constructed, the LHA would request that the amenity block needs to be accessible with access ramps rather than steps. At present the block does not appear to offer ramped access and therefore the LHA recommends that this is addressed.

Other matters

Lighting on the site may be required and therefore the LHA would recommend liaison with the WCBC Street Lighting Engineer. Furthermore, due to the levels and some flooding and a possible culvert near the entrance the LHA would recommend that the WCBC SAB officer is consulted on the proposals.

Should the LPA be minded to grant the application the provision of a Construction Traffic Management Plan should be conditioned. Furthermore the applicant should fund the provision of appropriate 'slow down' lining and signing on approach to the site entrance.

Conclusion

Whilst there are no objections in principle to the proposals, further information is required in regard to:

- Visibility splays of 2.4m x 215m are required in either direction at the site entrance with nothing higher than 1m within the visibility splay. An 85th percentile speed survey could be undertaken to demonstrate the speeds experienced at the site entrance and would derive the requirements for the visibility splays should vehicles be travelling lower than the 60mph speed limit.
- Revised site access road design with details of the proposed construction materials.
- Swept paths are required to demonstrate a mobile home on a low loader can be delivered within the site should other pitches be occupied.
- The WCBC standards state that residents should not be required to move their waste further than 15m and WCBC operatives will only walk upto 15m to access waste bins, therefore the LHA would suggest a waste presentation point may be beneficial to ensure waste bins are presented for collection on the required day. The applicant must ensure the presentation point does not impede visibility splays at the site access.
- The LHA noted on site that there was a level difference between the site and the public highway and requests clarification on the levels to ensure the access does not exceed the accepted maximum gradient for pedestrians of 1:12 on DDA grounds. A topographical survey is suggested.
- It is noted that the amenity block is already constructed, the LHA requests that the block needs to be accessible with access ramps rather than steps. At present the block does not appear to offer ramped access and therefore the LHA recommends that this is addressed.
- Lighting on the site may be required and therefore the LHA would recommend liaison with the WCBC Street Lighting Engineer.
- Due to the levels and some flooding and a possible culvert near the entrance, the LHA would recommend that the WCBC SAB officer is consulted on the proposals.



On behalf of Chief Officer, Environment & Technical

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 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.