

MEMORANDUM

From:	Chief Officer, Environment & Technical	To:	Chief Officer Economy & Planning
		FAO::	Emma Bailey
Our Ref:	ET/DC/DB/P/2024/0240	Your Ref:	P/2024/0240
Date:	27/11/2024		

TOWN AND COUNTRY PLANNING ACT 1990

NEWID DEFNYDD ADEILAD AMAETHYDDOL I DDEFNYDD CYMYSG DOSBARTHIADAU B1/B8 (MICROFRAGDY) A HOLL WAITH CYSYLLTIOL (ÔL-WEITHREDOL) / CHANGE OF USE OF BUILDING FROM AGRICULTURE TO MIXED USE CLASSES B1/B8 (MICRO BREWERY) AND ALL ASSOCIATED WORKS (IN RETROSPECT)

OLD FARM BOWLING BANK WREXHAM
Grid Ref: E 340627 N 349672

I refer to your consultation / email dated 23/04/2024 in respect of the above and receipt of Sumner Consultancy Transport Statement applying to both P/2023/0827 and P/2024/0240 on the same site.

The proposed development site is located on a narrow, rural, classified road subject to a 60mph speed limit. However, we would estimate typical vehicle speeds at being around 25mph given the geometry of the road.

Access to and from the site and Traffic Generation:

This application is for microbrewery business and is retrospective. It is one of a number of recent applications on this site that collectively have clearly contributed to a deterioration in not only the highway of Church Lane and Bryn Villa Rd, but the verges at informal and substandard passing points and bends along the way. There have been valid complaints registered regarding the intensification of traffic within the vicinity of the site.

Overall trip generation.

The LHA requests data to be provided that considers all combined uses that currently use or will have potential to use this site. This should include:

- The residual farmland/agricultural fields accessed through this site
- Existing residential use of the farmhouse
- A Car Workshop. (Details not known)
- Micro Brewery
- Tree Surgery Business
- Any building or uses not included in the above with an existing use on the site, other than the existing farm activities?

To enable the LHA to review the above, relevant TRICS data should ordinarily be provided for the existing and proposed uses on the site to provide a full picture of two way trips.

However, in this instance we note the applicant has presented the proposed trip generation based on their own practical assessment. This appears to differ from informal recordings by neighbours. As both applications are retrospective, the LHA recommends that an independent professional survey is undertaken demonstrating actual figures in lieu of TRICS data proposals. Surveys are required to be carried out during school term time.

Any summary of vehicle movements needs to include staff movements, deliveries and movement associated with residential use. Movements need to be quoted as daily two way movements.

Trip generation is one consideration, but the nature and size of the vehicles in addition to the frequency of these trips is a major concern bearing in mind the nature of the local highway network. It is noted that the existing agricultural and residential neighbourhood uses already generate some tractor and HGV traffic, but the network simply isn't currently designed to accommodate any intensification.

Therefore, the Local Highway Authority (LHA) require a full picture of the cumulative uses of the site in order to assess the impact fully. The LHA are concerned that the applicant has proposed a series of passing places, but it is not considered that these are adequate to mitigate the proposals.

For a passing place to be accepted it must:

1. Be on Highway owned land.
2. Be hard surfaced and built to adoptable standards
3. Be approved by the SAB officer for drainage design
4. Be constructed to a length that accommodates the maximum size of an articulated vehicle plus tapers either side
5. Consider illumination, signage and existing services in the design.

The LHA have reviewed the route and passing places proposed within the submitted documentation and believe there are only 1 or 2 places that could be considered useable. There may be another 4 or 5 locations that have potential to be useable. However, in reality, an adequate passing place would be required every 50m, with clear inter-visibility between passing places.

There has been a noticeable deterioration in the verge in numerous locations, particularly during wet weather conditions. Whilst this will not be solely as a consequence of these two applications, concern remains that the local highway network in the vicinity of the site cannot accommodate the frequency and size of vehicles required to service this development.

Access Detailing

In keeping with an assumed 85th percentile speed of 25mph, any proposed / existing access in this location would normally be required to provide visibility splays of 2.4 x 33m in both directions measured to the centerline of the adjoining highway. Visibility can be relaxed to the centerline of the adjoining highway given the restricted carriageway width along this section.

Existing Northerly Access (serving existing dwelling & outbuildings)

Visibility from the existing main access serving the development site is adequate in both directions providing splays in excess of 2.4 x 33m measured to the centerline of the adjoining highway.

The existing / proposed access is currently 6.7m wide, hard paved with gates setback approximately 3.4m behind the adjoining carriageway. We would normally recommend that any gates are setback a minimum distance of 10m for agricultural use or medium sized vans are being used. If articulated HGVs are now visiting the site accessing via the north entrance, then we would recommend that no gates are erected.

Existing Southerly Access (serving existing agricultural use)

Visibility from the southerly access serving the development site is adequate in both directions providing splays in excess of 2.4 x 33m measured to the centerline of the adjoining highway.

This access is approximately 7.2m wide and is gated at around 15m behind the adjoining carriageway. The access is surfaced with loose bound materials. If this access is to remain in use, then it would benefit from being surfaced with hard bound materials for a minimum distance of 10m behind the adjoining highway. Any gates should be setback a minimum distance equal to the maximum length of vehicle likely to visit the site (or preferably no gates).

Parking & Turning Provision

The LHA accepts that there seems adequate space for vehicles including articulated HGV's to turn within the site, if the southern entrance is used.

However, whilst the site layout plan provided includes parking spaces for this application, the LHA requires an updated plan that includes car and cycle parking spaces for all site uses referencing LPGN16 requirements based on floor areas of each use and swept paths demonstrating that there remains adequate space for the turning of vehicles within the site

Should the Local Planning Authority be minded to grant permission, in order to minimize vehicle movements associated with the site, the LHA would recommend a suitable condition is included that prohibits direct selling of any goods from the site. This would avoid generating additional traffic and would minimize the need for visitor car parking on site.

Active Travel and Sustainability

The development site is located on a rural, classified road along which there is no footway provision or street lighting.

We refer to Wrexham county borough council's policy to consider and encourage active travel and development within sustainable locations (Ref Clause 3.2 of TAN18). It may be considered that the proposed development site is in an unsustainable location and does not support the opportunity for staff to walk safely to local facilities and public transport stops.

When compared with similar businesses located in the WIE nearby, the sustainability of this site does not compare favourably.

Construction Traffic Management Plan (including details of contractor parking)

If the LPA is minded to grant permission the LHA would request a suitably worded condition requesting a Construction Traffic Management Plan in order to construct the proposed entrance works.

Summary and Conclusion

We refer to highways response ET/DC/DB/P/2022/0550 dated 27th July 2023 and associated correspondence including emails. We concluded then that the LHA were unable to support the proposal and this was referred to in the refusal.

The Sumner Consultancy TS and the reference to passing places does not provide satisfactory mitigation to enable the LHA to remove their objection.

The LHA's observations are that the highway and verges have already deteriorated as a consequence of the intensification of use in terms of frequency, size and nature of traffic to date.

If the applicant were to provide satisfactory proposals for fully adoptable passing places with inter-visibility between them, between the site and the B5130, we would be happy to reassess, subject to the resolution of other technical matters including:

- Presentation of accurate independent trip generation or TRICS data demonstrating negligible increase in traffic / large vehicles along the rural lanes.
- Active Travel provision, as noted previously.
- Improvements in the construction of the entrance to LHA standards incorporating drainage, road markings, hard surfacing up to the proposed gates and full engineering specifications.
- Clear presentation of parking spaces for all site uses in accordance with LPG16 and adequate turning space within the site for large vehicles.

We accept there seems adequate facility for vehicles to turn, and the visibility splays at both entrances are reasonable.



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 for information in the event works being carried out in or adjacent to the public highway

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 asked 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.

Chief Officer, Environment & Technical