

MEMORANDUM

From: Chief Officer, Environment & Technical **To:** Chief Officer Planning & Regulatory

Our Ref: ET/DC/DB/P/2022/0681 **Your Ref:** SH/P/2022/0681

Date: 18th August 2023

TOWN AND COUNTRY PLANNING ACT 1990

TOWN AND COUNTRY (GENERAL DEVELOPMENT PROCEDURE) ORDER 1995

Location: O. S Grid Ref: 318 556 Land South of Llay Road, Cefn y Bedd, Wrexham.

Development: Change of use of land for use as Christmas Tree Farm and Outdoor Recreation Centre to include Reindeer Centre, Paddle Boarding, Water Related Activities and Extension of Existing Lake, Creation of Bark Footpath, Erection of Building to Provide Office, Machine and Equipment Store, Hay / Straw Storage and Sick / Maternity Bay Space for Reindeer and creation of car park, access and site landscaping.

Further to previous Highways responses and Axis letter 18th July referring to visibility splays, traffic flows, turning, and other comments, all of which still stand, this department has reviewed/reappraised the proposal in terms of its location in relation to neighbouring settlements and the B5102, with its substandard narrow footpath along the north side of the road.

Contrary to the comment noting potential Active travel improvements to the footpath as early as 2024, we can confirm that there are no such plans currently, nor funds available to carry out any upgrades in the foreseeable future.

Consequently, and following considerable debate within this department we have concluded that we cannot support the application as it stands without any improvements to the pedestrian access to and from the site for the following reasons:

1. Whilst the B5102 is subject to a 40mph speed limit, as noted in the previous correspondence 52.6mph and 50mph observed 85th percentile speeds are recorded, considerably greater than the limit. This data demonstrates that some vehicles are travelling faster again.
2. The footpath is generally only circa 800mm wide, less than half the width of the recommended 1.8-2m normally specified, therefore is inadequate. This inevitably puts pressure on one or more pedestrians stepping into the road if families meet in opposite directions, which would obviously be a potential risk along such a fast stretch of road.

3. This road is frequently used by HGV's as well as cars, adding to the risk of danger due to their increased width and reduced manoeuvrability.
4. The location of an uncontrolled crossing point, if outside the site is not ideal on a fast and undulating section of the road.
5. If, as its name suggests the applicant proposes to open through the winter months, any access would need to have adequate street lighting.

Had the distance to and from Llay and Cefn-y-bedd been significantly longer, and not within a distance that may tempt some pedestrians, our response may have been more positive. Obviously, had the application been adjacent to either settlement, or with improved access, then again, we would be able to support the proposal.

Should the applicant wish to explore options for improving pedestrian and cycle links between Llay and Cefn-y-bedd, and bus routes, they can liaise directly with Gwen Thomas available on 01978 729667. However, we have already received feedback that even surveys to investigate feasibilities of such schemes may be cost prohibitive.

Conclusion:

We are unable to support the scheme until such time concerns over the access to and from the site, as well as visibility splays are addressed, including:

- Increased width of pavement,
- provision of street lighting,
- provision of a safe crossing point,
- Surety of long term visibility splays in both direction, clearly indicated on a plan and demonstrated on site. Any visibility splays across third party land would only be accepted if a section 106 agreement is provided. (We can assist with this process if required)
- Possibly even a reduced speed limit

We note that demonstration of adequate parking in accordance with LPG16e and arrangements for servicing, turning and safe pedestrian movement could be conditioned and reviewed if the above is resolved, or overruled.



Chief Officer, Environment & Technical