

# MEMORANDUM

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| <b>From:</b>    | Chief Officer, Environment & Technical | <b>To:</b>       | Chief Officer Planning & Regulatory |
|                 |                                        | <b>FAO::</b>     | Jenni Perkins                       |
| <b>Our Ref:</b> | ET/DC/PP/P/2023/0598 Res(4)            | <b>Your Ref:</b> | P/2023/0598                         |
| <b>Date:</b>    | 14/02/2024                             |                  |                                     |

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## TOWN AND COUNTRY PLANNING ACT 1990

**NEWID DEFNYDD ADEILAD O DDEFNYDD AMAETHYDDOL I DDEFNYDD MASNACHOL A'R HOLL WAITH CYSYLLTIEDIG / CHANGE OF USE OF BUILDING FROM AGRICULTURE TO COMMERCIAL USE AND ALL ASSOCIATED WORKS**

**ISYCOED FARM HOLT ROAD RIDLEYWOOD WREXHAM**  
**Grid Ref: E 340469 N 351499**

I refer to your consultation / email dated 03/01/2024 including revised plans (Drg. Nos. 77362/TJC/004 Rev C & 77362/RJC/003 Rev B) and revised Transport Statement in respect of the above.

### Access

The proposed development site is located on the B5130 Holt Road which is a rural, classified road subject to a 40mph speed limit.

Assuming typical speeds of 40mph, any proposed / existing access in this location would normally be required to provide visibility splays of 2.4 x 120m in both directions measured to the nearside edge of the adjoining highway in accordance with TAN 18. However, given the geometry of the road to the south west of the farm, speeds may be lower. **The applicant may wish to carry out a speed survey in order to determine 85<sup>th</sup> percentile speeds along this section.**

The site is currently served by 2 accesses as follows:-

#### Main Access (to North East)

I understand that this access serves the main farmhouse, provides milk tanker access and the majority of vehicle movements associated with the farm.

Visibility from this access is currently inadequate in the north easterly direction providing a splay of approximately 2.4 x 70m measured to the nearside edge of the adjoining highway. Visibility is impeded by the existing hedgerow.

Visibility in the south westerly direction is adequate providing a splay in excess of 2.4 x 120m measured to the nearside edge of the adjoining highway.

The access is approximately 14m wide reducing to 6.3m wide at 5.3m behind the adjoining carriageway where it is gated. The access is paved with hard bound materials. I would normally recommend that such an access is gated at a minimum distance of 10m behind the adjoining highway or greater if a milk tanker is utilizing the access.

I would not normally be able to support any proposed development that is likely to result in any significant increase in vehicle movements utilizing this sub-standard access.

#### Proposed Use via Main Access

I understand that all existing agricultural activity through this access will cease and any remaining agricultural activity will utilize the south easterly access. The main access will only be used to serve the proposed 7 no. business units.

It is proposed to improve visibility from this access in the north easterly direction by setting back the existing hedgerow. However, it would only seem possible to improve visibility to approximately 2.4 x 105m measured to the nearside edge in this direction due to the required splay needing to cut across 3<sup>rd</sup> party land. This would represent a significant increase in the available visibility from the main access.

**It is proposed to setback the gates at this access to 10m from the highway boundary. This would be acceptable if any vehicles proposed to use the access did not exceed 10m in length. However, the latest plan Drg. No. 77362/RJC/003 Rev B indicates swept paths of a 16.5m articulated lorry entering the site. This would require either no gates being erected or gates setback 20m behind the adjoining highway.** I assume that this has been shown as it is intended for an articulated lorry to visit 4 times per year to deliver feed to the farm.

#### South Westerly Access

I understand that this access serves as a secondary access providing occasional access to tractors / trailers and movement of cattle.

Visibility from this access in the north easterly direction is adequate providing a splay in excess of 2.4 x 120m measured to the nearside edge of the adjoining highway.

Visibility in the south westerly direction is currently inadequate providing a splay of approximately 2.4 x 75m measured to the nearside edge of the adjoining highway. Visibility is impeded by the existing boundary fence and potentially crosses 3<sup>rd</sup> party land.

The access is approximately 16m wide reducing to 4.2m wide at 7.6m behind the adjoining carriageway where it is gated. The access is paved with hard bound materials. I would normally recommend that such an access is gated at a minimum distance of 10m behind the adjoining highway for agricultural use.

I would not normally be able to support any proposed development that is likely to result in any significant increase in vehicle movements utilizing this sub-standard access.

#### Proposed Use via South Westerly Access

I understand that all remaining agricultural activity at the farm will utilize this access along with the existing farmhouse. The main access will only be used to serve the proposed 7 no. business units.

It is proposed to improve visibility from this access in the south westerly direction which I assume will be achieved by setting back the existing boundary fence. However, it would only seem possible to improve visibility to approximately 2.4 x 83m in this direction due to the geometry of the road and the required splay needing to cut across 3<sup>rd</sup> party land.

This access would benefit from widening to a minimum width of 4.8m for at least 10m behind the adjoining highway and surfaced with hard bound materials. **This detail has been indicated on the revised layout plan.**

Although, this access has limited visibility in the south westerly direction, it is an existing access through which has been used for previous agricultural related purposes. It may therefore be difficult to object to using this access purely for agricultural purposes.

### **Parking & Turning Provision**

Adequate parking and turning provision would need to be provided for the proposed commercial units. I understand that the proposed 7 no. units have a gross floor area of 2334m<sup>2</sup>. **As previously highlighted, I would recommend the applicant provides details of the precise LPGN 16 Class Use (eg/ B1, B2 , B8) proposed in order to assess parking provision along with the individual floor areas of each unit (A-G).** The Class use with the highest parking demand in this instance is likely to be B1 – Business & Light Industry which requires a maximum of 1 car space per 30m<sup>2</sup> gfa. This potentially requires a maximum of 78 spaces. The submitted plans indicate the provision of 30 spaces in total. **I await the requested information.**

I understand that some existing agricultural activity will continue at the farm. **I would recommend that details of the parking and turning arrangements for this activity is provided / indicated on a revised layout plan. The submitted swept path details (Drg. No. 77362/RJC/003 Rev B) indicate the movements of a tractor & trailer within the site but not in / out of the south westerly access. The swept paths have not been carried out with standard swept path software. This detail needs to be provided.** Parking provision for the farm has been demonstrated.

I understand that a milk tanker currently visits the site on a daily basis utilizing the existing north easterly access. I understand that the milk tanker reverses off the road into the site due to limited turning space which is not ideal. However, I understand that the need for milk collection will cease at the farm under this proposal and has been confirmed by the applicant.

**The submitted swept path details of the maximum size / length of vehicle (HGV) likely to visit the site has been provided ie/ 16.5m long HGV. However, this has been carried out with non-standard swept path software. The swept path details only indicate such a vehicle entering the site in both directions off Holt Road from the proposed access point ie/ north easterly access.** I previously requested swept path details of such a vehicle entering from both directions and exiting in both directions. **This detail needs to be provided by the applicant.**

### **Active Travel**

I would recommend that you / the applicant liaises with our Strategic Transport Manager – Gwen Thomas on Tel: 01978 729667 (or email: gwen.thomas@wrexham.gov.uk) in respect of any specific requirements for the proposed development (eg/ access layout, road markings, cycle paths, cycle parking) that may be required under the Active Travel Act Guidance. **Any such modifications / provisions should be referenced / indicated on a revised layout.**

## Traffic Generation

I would normally request details of existing and proposed **daily** vehicle movements differentiating between the two access points.

The submitted Transport Statement indicates information on existing & proposed vehicle movements but does not equate them all to daily vehicle movements and does not indicate the number of existing / proposed staff. Presenting data on vehicle movements in terms of daily movements is standard practice. **This detail needs to be provided.** It is not clear what type of businesses are proposed and whether they will attract customers / clients. The vehicle movements indicated for the existing agricultural activity and the proposed Units A – G appear fairly low. I would have thought that any proposed commercial businesses have the potential to attract customers / clients. The latest Transport Statement suggest that the proposed units will not have staff. It also states that the proposed units will be for those requiring storage / workshops. It is not proposed that the units will require customers and frequent visitors. Alternatively, it will be a business that requires a workshop and traffic movements will be low. **This information appears vague and I assume such use could not be controlled by a suitable condition.**

On reviewing the submitted traffic movement information, I comment as follows:-

It is stated that currently both accesses are used to serve the farming enterprise. The existing Dairy Enterprise movements when roughly calculated on a daily basis only equate to approximately 8.2 movements per day (of which 3.6 movements relate to HGVs), which is relatively low.

It is intended that the north easterly access will only be used to serve the proposed 7 no. business units. The anticipated daily traffic movements submitted for the business units range from 2 – 5 movements. It is not clear why these movements are so low as I would have thought that these businesses have the potential to attract customers / clients. **This detail needs to be clarified.** The proposed total number of daily vehicle movements indicated for the proposed business units on their own equates to 20 movements. This is approximately 2.5 times more movements than the farm currently generates as a whole according to the submitted information.

The remaining agricultural activity (small beef enterprise only) proposed to utilize the south westerly access when considered as daily vehicle movements only equates to approximately 0.08 movements per day which seems very low.

## Sustainability

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

## Public Footpath

Public footpath - PROW, Isycoed no. 8 passes alongside the south western boundary of the site and must not be interfered with. I would strongly recommend that the applicant liaises with our Public Rights of Way Section to discuss the proposed development. Please contact Mr. Sean Hanratty on Tel: 01978 729761.

### **Service and Delivery Management Plan (SDMP)**

If supported, it may be considered appropriate to include a condition for a SDMP to control the type/ size / frequency of delivery vehicles to the site. The latest Transport Statement indicates that only car / vans will typically visit the proposed commercial units.

### **Construction Traffic Management Plan (including details of contractor parking)**

If supported, in order to construct the proposed scheme, the applicant will need to submit a Construction Traffic Management Plan including details of contractor parking for further approval. This could be included as a planning condition.

### **Conclusion**

I would recommend the applicant addresses the issues raised.

It may be considered that the proposed change of use is acceptable given the access improvements being offered subject to a suitable SDMP being conditioned.

### **Supplementary Notes**

The applicant's attention should be drawn to item nos. 1, 2, 3, 4 & 5 of the supplementary notes.

### ***Note to Applicant:***

*Public Footpath No.8 - Isycoed passes through / alongside the development site and should not be interfered with. I would strongly recommend that the applicant liaises with our Public Rights of Way Section to discuss the proposed development. Please contact Mr. Sean Hanratty on Tel: 01978 729761.*



Chief Officer, Environment & Technical