

MEMORANDUM

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

Our Ref: ET/DC/PP/P/2021/0640 **Your Ref:** SEH/P/2021/0640

Date: 26th October 2021

TOWN AND COUNTRY PLANNING ACT 1990

TOWN AND COUNTRY (GENERAL DEVELOPMENT PROCEDURE) ORDER 1995

Location: O. S Grid Ref: 493 411 Land Between Holly Cottage and Chapel Farm, Whitewell, Whitchurch.

Development: Change of use of agricultural land to caravan site and associated works.

I refer to your consultation / email dated 25/10/2021 including Access Assessment (Dated 11-10-21) in respect of the above.

Access

The proposed development site is located on Whitewell Road which is a rural, classified road subject to a 60mph speed limit.

Assuming typical speeds of 40mph, any proposed / existing access 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.

Visibility from the existing access is inadequate in both directions providing splays of approximately 2.4 x 6m in both directions measured to the nearside edge of the adjoining highway. Visibility is impeded in both directions by the existing gates, gate posts and mature hedgerow along this section.

The submitted Access Statement includes estimated speeds of 35mph (westbound) and 40mph (Eastbound) which has been estimated by the Highways Consultant by driving along the road. It is normal practice for an applicant to commission a speed survey where 85th percentile speeds can accurately determine the required stopping distances / visibility splays. Even if vehicle flows are low along this section of road, it would still be normal practice to carry out a speed survey.

The submitted layout plan (Drg. No. 719-21-05) indicates visibility splays from the proposed access of 2.4 x 90m to the west and 2.4 x 60m to the east (measured to a point 1m from the nearside edge of carriageway).

The Access Statement includes proposed visibility splays derived from the formula in Manual for Streets (MFS). I would not consider the use of MFS for deriving the required splays to be appropriate in this instance where speeds are not considered to be less than 40mph in either direction.

In this instance, measuring the y distance to the nearside edge wheeltrack of the adjoining highway is acceptable. However, I would consider an appropriate distance for the nearside wheel-track to be no more than 0.5m from the edge of carriageway (not 1m).

The existing field access is currently 5m wide and is gated 1.5m behind the edge of carriageway. The access is un-surfaced. Any proposed access would need to be designed to accommodate the simultaneous passage of 2 no. cars with caravans clear of the adjoining highway. The submitted layout plan indicate a proposed widened access of 5.5m splayed both sides which is considered acceptable. The swept path details indicated on the submitted plan (Drg. No. 719-21-70) are considered acceptable.

Any proposed access would need to be surfaced with hard bound materials for a minimum distance of 10m behind the adjoining highway with no gates (preferably) being erected. An Aco drain or similar is typically required to intercept any private surface water run-off where any access falls towards the highway. The submitted layout plan indicates the required detail.

Any proposed modifications / widening of the access will require s.184 consent from the Highway Authority.

In terms of access to / from the site, the applicant has indicated that the typical route would be via Whitewell Road and Broadoak Lane. Both of these roads are typically narrow in nature and the simultaneous passage of 2 cars is generally restricted.

Visibility at the junction of Broadoak Lane with the A525 Whitchurch Road (40mph) is inadequate in both directions currently providing splays of approximately 2.4 x 40m in the westerly direction and 2.4 x 20m in the easterly direction measured to the nearside edge of the adjoining highway. Visibility is impeded by the existing hedgerows / vegetation. Any existing junction of this nature would normally require visibility splays of 2.4 x 120m in both directions measured to the nearside edge of the adjoining highway.

Visibility at the junction of Whitewell Road onto the A525 (50mph) located further to the east is also sub-standard in the westerly direction providing a splay of approximately 2.4 x 40m measured to the nearside edge of the adjoining highway.

It would therefore be difficult to support a development of this nature given the issues raised above.

Layout

I would normally recommend that the internal access road serving the site is a minimum of 5.5m wide. The internal access will need to be of sufficient width to provide access to a refuse vehicle. Clarification on the proposed waste / recycling arrangements for the site will need to be provided to ascertain the size of refuse vehicle likely to visit the site and the submission of swept path details indicating how such a vehicle will access / exit the site and turn within the curtilage of the site.

A suitable turning facility will be required within the curtilage of the site to accommodate the turning movements of a refuse vehicle. If WCBC were to service the site, then an 11.2m long refuse vehicle would need to be able to turn within the site and exit in a forward gear. **Could you please ask the applicant to indicate this detail on a revised layout plan.**

Details of where refuse / recycling is to be collected from and adequacy of facilities proposed will need to be discussed with our Waste Strategy Officer. I would recommend that the applicant liaises with our Waste Strategy Officer (Catherine Golightly) on Tel: 01978 729693.

Parking and Turning Provision

Adequate parking and turning provision would need to be provided within the curtilage of the site in accordance with LPGN 16 requirements. The provision of 2 parking spaces per caravan would be considered adequate or 1 space per caravan plus visitor parking. Only 1 space per plot appears to have been provided. **Could you please ask the applicant to amend this detail on a revised layout plan.**

Sustainability

The development site is located in a relatively remote rural location on a classified road along which there is limited footway provision. It may be considered that the proposed development site is in an unsustainable location and does not support the opportunity for those staying at the site to walk safely to local facilities and public transport stops.

The proposed development may not be considered to meet the requirements of the settlement policies detailed in TAN 18. These policies require such developments to provide safe walking and cycling routes to local facilities and public transport stops.

Surface Water Drainage

A suitable scheme for the disposal of surface water will need to be submitted. I assume that our Flood Management Section will be approving any proposed scheme.

Certified Site

I understand that the applicant can set up and operate a Certified Site for tourist accommodation without the need to obtain planning permission. Such a site can comprise up to 5 caravans as well as 10 tents. I understand that this is the fallback position should the application be refused.

In conclusion, it would be difficult to support a development of this nature given the issues raised above.

Note to Applicant

VERGE CROSSING LICENCE

A licence should be obtained (as required by section 184 of the Highways Act 1980) from the Highway Authority in order to cross the verge at the new access position. Further guidance can be obtained from the Highways Department of Wrexham County Borough Council on telephone 01978 729670.

Supplementary Notes

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

A handwritten signature in black ink, appearing to be 'R. K. S.', located in the top left corner of the page.

Chief Officer, Environment & Technical