MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO::	Dafydd Thomas
Our Ref:	ET/DC/DB/P/2025/0268	**Your Ref:**	P/2025/0268
Date:	19/08/2025		

TOWN AND COUNTRY PLANNING ACT 1990

NEWID DEFNYDD TIR I SAFLE SIPSIWN A THEITHWYR TEULUOL Â 3 LLAIN AC ADEILADU STABLAU / CHANGE OF USE OF LAND TO A 3 PITCH FAMILY GYPSY & TRAVELLER SITE AND ERECTION OF STABLES

LAND TO THE NORTH OF, BRYMBO ROAD, BWLCHGWYN, WREXHAM, LL11 5TY

We refer to your consultation / email dated 29/04/2025 in respect of the above.

The LHA acknowledge receipt of the above application, but have significant concerns as follows that need to be addressed prior to being able to provide a conclusive highways response supporting the proposal.

1. Provision of safe pedestrian access should be made to and from neighbouring villages of Brymbo and Bwlchgwyn. The LHA do not consider pedestrians walking along the Brymbo Rd to be safe, without illumination nor an adequate active travel footpath/cycleway segregated from the road.

2. The application form refers to 3 caravans, however the drawing, and google maps indicate 6 caravans, plus a van, and numerous other vehicles. Clarity on the maximum number of caravans and other potential uses creating traffic flow is required.

3. The existing stable block use was considered favourably as trip generation was low. Adding what may be the equivalent of 6 no. caravans, plus associated vehicles is a proportionally significant intensification of the existing approved use. This requires significantly greater information on trip generation and existing vehicle speeds on the main road than has been provided.

4. A fully scalable plan of the entrance is required demonstrating via swept-path analysis how vehicles towing caravans can enter and leave the site in a forward gear. Demonstration of adequate forward visibility **in both directions** on Brymbo Rd is essential for when vehicles are manoeuvring in and out of the access and potentially encroaching into the oncoming lane.

5. Full visibility splays appropriate for the accepted 85th percentile speed on the highway passing the site should be shown on the same scalable plan. Visibility splays must take account of the vertical level differences on Brymbo Road particularly to the East of the access.

6. Demonstration that the land within the visibility splays is within the control of the applicant, and conformation that it will be maintained in perpetuity to a height below 1.05m and free of any obstructions.

7. Demonstration that adequate turning space within the plot will be maintained for the worst case vehicles which may be used. This may be long wheel base vans with caravans of up to 7 or 8m in length, or HGV horse boxes.

8. The gate should be set back so as to ensure a vehicle and/or caravan does not obstruct the public highway whilst opening or closing the gate.

9. If the above issues can be resolved, adequate illumination of the entrance should be provided also.

We refer the applicant to the historical applications with similarities that demonstrate the LHA's concerns in locations such as this.

- Christmas tree Farm Llay – Refused and this decision was upheld in a subsequent appeal.

- An historical Travellers site between Trevalyn and Holt. This was many years ago, but was similarly in character.

Neither of the above could demonstrate safe pedestrian access to and from nearby villages. This would be particularly relevant for children walking to and from schools, shops or other village amenities.

Conclusion

The LHA are unable to support this application without significant and fundamental improvements. The lack of safe pedestrian access and demonstrating a safe access is available, given the increased intensification of use, are fundamental issues.



On behalf of Chief Officer, Environment & Technical

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.