MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO:	Jenni Perkins
Our Ref:	ET/DC/PP/P/2025/0346 Res(2)	**Your Ref:**	P/2025/0346
Date:	16/10/2025		

TOWN AND COUNTRY PLANNING ACT 1990

PROPOSAL: NEWID DEFNYDD ADEILAD O DDOSBARTH D1 YSGOL I SAFLE AML-DEFNYDD YN CYNNWYS DEFNYDD A1, A3, B1, D1, A D2 / CHANGE OF USE FROM D1 SCHOOL TO MULTI-USE SITE INCLUDING A1, A3, B1, D1 AND D2 USES.

LOCATION: PONTFADOG COUNTY PRIMARY SCHOOL, PONTFADOG, LLANGOLLEN, LL20 7AH

I refer to your consultation / email dated 02/10/2025 including revised site plan (Drg. No. 1903-ACS-XX-ZZ-DR-T-001-A) and Transport Statement - Rev A Dated 26/06/2025) in respect of the above.

Access

The proposed development site is located on the B4500 which is a classified road subject to a 20mph speed limit.

Any proposed / existing access in this location would be required to provide visibility splays of 2.4 x 25m in both directions measured to the nearside edge of the adjoining highway in accordance with Manual for Streets.

Visibility from the existing access is inadequate in both directions providing a splay of approximately 2.4 x 7m in the north easterly direction and 2.4 x 6m in the south westerly direction measured to the nearside edge of the adjoining highway. Visibility is currently restricted in both directions due to the existing hedgerow and also the required splay in the north easterly direction would need to cut across 3rd party land.

The revised layout plan indicates a modified / widened access providing splays of 2.4 x 25m in the westerly direction and 2.4 x 21m in the easterly direction measured to the nearside edge. **The LHA recommend that the proposed access is re-located a short distance to the west to achieve the required splay of 2.4 x 25m. The LHA recommend that this detail is indicated on a revised layout plan.**

The existing 4.3m wide access serving the development site is served by a 4.5m wide dropped kerb The access is surfaced with hard bound materials. The LHA previously recommended that the existing access is widened to a minimum width of 4.8m with no gates being erected across the access. This will require the widening of the existing dropped kerbs fronting the access. The access may need re-locating in the westerly direction to provide the required visibility splays. This will require s.184 consent from the Council. **The revised layout plan indicates the widening of the access to 4.8m. However, the required visibility splay of 2.4 x 25m is not indicated in the easterly direction and needs to be amended on a revised layout plan. The gates indicated at 5m behind the edge of carriageway can be conditioned to remain open during operational hours.**

Any proposed access will require surfacing with hard bound materials for a minimum distance of 5m behind the highway boundary. An Aco drain or similar will be required across the access to prevent any surface water run-off flowing onto the adjoining highway (where an access falls towards the highway). The above details can be delivered via appropriate planning conditions.

Parking & Turning Provision

Adequate parking & turning provision will need to be provided within the curtilage of the site in accordance with LPGN 16.

The submitted Transport Statement and and site layout plan indicates the provision of 15 car spaces (1no. to mobility standards) within the curtilage of the site. One of the proposed spaces at the northerly edge of the site only has 4.8m clearance behind for turning (min. 6m required). **The LHA recommend that this space is relocated to the east a short distance to achieve 6m clearance but without impeding the proposed turning area / swept paths of a 7.2m long medium sized delivery vehicle.**

The LHA recommend that a suitably scaled plan (including annotated dimensions) is submitted which indicates the above details.

The LHA recommend that any proposed spaces are marked out with white lining materials.

It may be considered appropriate to include a suitable condition for a Service Delivery Management Plan (SDMP) to control the size of vehicle permitted at the site.

The submitted Transport Statement indicates LPGN 16 parking requirements in respect of Class A1, A3, B1, D1 & D2 with proposed floor areas. Based on the submitted floor areas / class uses the proposed development would require a maximum of 16 spaces. The provision of 15 no. spaces as indicated would be considered acceptable

Swept Path Details

The revised layout plan indicates the swept path movements of a 7.2m long medium sized delivery vehicle which is considered acceptable. **The LHA recommend the maximum size of vehicle permitted to visit the site is controlled by a suitable condition ie/ Service Delivery Management Plan (SDMP).**

Cycle Parking / Storage

The revised plan does not indicate sufficient detail of any proposed cycle parking / storage provision as required by LPGN 16 / Active Travel Guidance. **The LHA recommend that adequate cycle parking provision (eg/ Sheffield stands including cover / shelter) is provided at the site. This requirement could be delivered by a suitable planning condition.**

Traffic Generation / Trip Generation

The submitted Transport Statement includes an estimate of the likely vehicle trip generation of a selection of uses that fall within the extant D1 use of the site is provided below. The estimates are based on typical trip rates for these uses that have been derived from the TRICS trip rate database. The TRICS data is included in Appendix 2 of the report:

Appendix 2 TRICS Trip Rate Data – Existing Permitted D1 Uses

Land Use	**Daily Vehicle Trip Rate**	**Daily Vehicle Trip Generation (191m2 gfa)**
Primary School	25.478 per 100m2	48 movements
Creche / Day Nursery	44.668 per 100m2	85 movements
Clinic / Health Centre	60.001 per 100m2	114 movements
Art Gallery / Museum	6.292 per 100m2	12 movements
Community Centre	28.469 per 100m2	54 movements
Place of Worship	17.490 per 100m2	33 movements

Table 1 Existing Permitted Use – Vehicle Trip Generation Estimate

The TRICS analysis suggests that the extant D1 use class of the site has the potential to generate between 12 daily vehicle movements and 114 daily vehicle movements, with the upper end of that range associated with the use of the site as a clinic or health centre. The use of the site as a day nursery would generate around 85 daily vehicle movements.

Trip Generation

The likely trip generation of the proposed development has been estimated based on evidence of typical trip rates for these uses that have been derived from the TRICS trip rate database. The TRICS data for café and office use is included in Appendix 3.

Appendix 3 TRICS Trip Rate Data (Café / Office)

Land Use	**Daily Vehicle Trip Rate**	**Daily Vehicle Trip Generation (191m2 gfa)**
Café	59.459 per 100m2	@ 36m2 = 21 movements
Office	3.722 per 100m2	@10m2 = 0.4 movements
D1 / D2 Community Centre Use	28.469 per 100m2	@71m2 = 20 movements
	Total	**42 Movements**

The submitted TRICS analysis suggests that the proposed use of the site has the potential to generate around 42 daily vehicle movements.

This falls within the range of traffic generation that can reasonably be expected from the existing permitted use of the site (see Table 1). The proposed change of use therefore has no impact in terms of the traffic generating potential of the site.

The LHA comment on the above details as follows:-

- *The proposed offices equate to 20m^2 not 10m^2 as indicated in the above tables.* ***This detail requires correction.***

- ***TRICS data – Primary School***
  The 4 submitted sites include 1 site from Ireland for which the survey is over 8yrs old and needs to be excluded from the review.

  TRICS data – Education / Nursery
  The sample only includes a single site. Additional sites would be required for a representative sample.

  TRICS data – Health Centres / Surgeries
  The survey includes 7 sites, 2 of which have survey data which is greater than 8 yrs old and therefore needs to be excluded from the review.

  TRICS data – Art Gallery / Museum
  The survey includes 3 sites with non-representative locations ie/ not freestanding or neighbourhood centres and all site survey data is greater than 8 yrs old and therefore needs excluding from the review.

  TRICS data – Community Centre
  The survey includes 5 sites, 2 of which are edge of town (non-representative locations). These sites need excluding from the review

  TRICS data – Place of Worship
  The survey includes 2 sites, both being edge of town centre location (non-representative locations). These sites need excluding from the review

  TRICS data – Café
  The survey data includes a single site from Ireland which needs to be excluded from the survey.

  TRICS data – Offices
  The survey includes 2 sites, one of which have survey data which is greater than 8 yrs old and the other site being from Ireland which therefore needs to be excluded from the review.

  TRICS data – D1 / D2 Use
  Data to be reviewed.

  The LHA recommend the above data is reviewed and re-submitted using survey data from either freestanding or neighbourhood locations where survey data is no more than 8 yrs old.

Highway Improvements

Footway
The existing footway fronting the site only appears to be approximately 1.1m wide. If the application is supported, the LHA recommend that the existing footway is widened to 2m in the interest of pedestrian safety.

The submitted Transport Statement indicates that there is already a 2m wide footway fronting the site which is restricted by the existing boundary hedge. **If this is the case, the LHA recommend that the applicant / site owner removes the existing hedgerow which is encroaching on the adopted highway. The LHA recommend that the applicant demonstrates provides photographs of the existing footway once this work is complete.** The WCBC Contracts & Engineering Manager has been made aware of this encroachment.

Existing Layby
There is an existing layby located opposite the site. If the application is supported, the WCBC Active Travel Section have recommended that this layby is closed up / reinstated to full height footway construction and a new bus stop / shelter with appropriate raised kerbs, bus stop markings provided in order to promote Active Travel. The LHA previously recommended that suitably scaled plan is submitted indicating this detail. **The LHA will review the above comments when they receive / review the requested additional information.**

Keep Clear / Zig Zag Markings
If the application is supported, the WCBC Traffic Section have recommended that the existing School, Keep Clear, zig zag road markings fronting the site are removed as they are not relevant to the proposed development. **The LHA recommend that suitably scaled plan is submitted indicating this detail.**

Dropped kerb / Tactiles - Pedestrian Crossing Points
Appropriate crossing points serving any proposed bus stop across the B4500 to the footway fronting the school will need to be provided. The LHA previously recommended that suitably scaled plan is submitted indicating this detail. **The LHA will review the above comments when they receive / review the requested additional information.**

The applicant will need to enter into a s. 278 agreement with the Council to carry out any works in the highway.

Waste / Recycling

It is assumed that the site will be serviced by a private waste company.

No details of the proposed waste storage / recycling area and proposed waste collection bins have been submitted. **The LHA recommend that suitably scaled plan is submitted indicating this detail.**

Construction Traffic Management Plan (CTMP)

If the application is supported, the LHA recommend that any consent includes a condition requiring the submission of a Construction Traffic Management Plan including provisions for contractor parking.

Conclusion

In conclusion, the LHA request additional information as follows:-

- **Visibility Splay**
  The revised layout plan indicates a modified / widened access providing splays of 2.4 x 25m in the westerly direction and 2.4 x 21m in the easterly direction measured to the nearside edge. **The LHA recommend that the proposed access is re-located a short distance to the west to achieve the required splay of 2.4 x 25m. The LHA recommend that this detail is indicated on a revised layout plan.**

- **Parking & Turning Provision**

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  The submitted Transport Statement and and site layout plan indicates the provision of 15 car spaces (1no. to mobility standards) within the curtilage of the site. One of the proposed spaces at the northerly edge of the site only has 4.8m clearance behind for turning (min. 6m required). **The LHA recommend that this space is relocated to the east a short distance to achieve 6m clearance but without impeding the proposed turning area / swept paths of a 7.2m long medium sized delivery vehicle.**

  The LHA recommend that a suitably scaled plan (including annotated dimensions) is submitted which indicates the above details.

  Cycle Parking / Storage

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- **Traffic Generation / Trips**

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KW Edwards

Contracts and Engineering Manager

On behalf of Chief Officer, Environment & Technical