MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO:	Jenni Perkins
Our Ref:	ET/DC/PF/P/2025/0300	**Your Ref:**	P/2025/0300
Date:	17/10/2025		

TOWN AND COUNTRY PLANNING ACT 1990

PROPOSAL: PROPOSAL: NEWID DEFNYDD TIR AR GYFER EI DDEFNYDDIO FEL FFERM GOED NADOLIG A CHANOLFAN HAMDDEN AWYR AGORED I GYNNWYS CANOLFAN CEIRW, PADLFYRDDIO, GWEITHGAREDDAU DWR AC YMESTYN Y LLYN PRESENNOL, CREU LLWYBR RHISGL, CODI ADEILAD I DDARPARU SWYDDFA, STORFA PEIRIANNAU AC OFFER, STORFA WELLT A GOFOD BAE SALWCH/MAMOLAETH AR GYFER CEIRW A CHREU MAES PARCIO, MYNEDIAD A THIRLUNIO SAFLE / 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 BAY/MATERNITY BAY SPACE FOR REINDEER, AND CREATION OF CAR PARK, ACCESS AND SITE LANDSCAPING

LOCATION: CHRISTMAS FARM, LLAY ROAD, CEFN Y BEDD, WREXHAM, LL12 9UG

I refer to your consultation / email dated 03/06/2025 in respect of the above.

Following the initial submission of a Highway Technical Note 02 (HTN) and site layout plans by the applicant, LHA comments on the initial proposals, further information has been provided by the applicant.

It is understood that this additional information comprises:

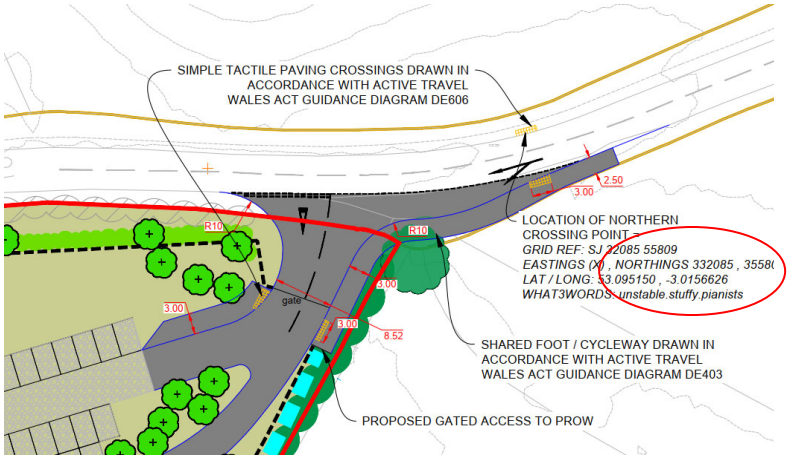
- Amended General Arrangement
- Amended Pedestrian Visibility Plans
- Amended Site Access Arrangement Plans
- Amended Swept Path Assessments
- Road Safety Audit

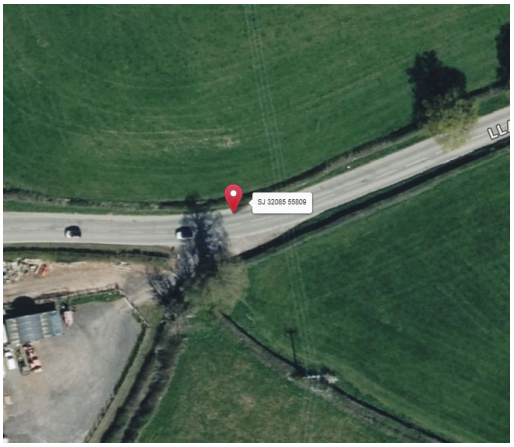
Taking each of these in turn:

Amended General Arrangement – Drawing 3034-01-002 F:
This drawing shows a revised access arrangement from that previously presented initially in this application (3034-01-002 D – as included as Appendix 1 of the HTN). This revised arrangement appears to remove the existing informal layby, with the junction radius kerbing proposed to the edge

of carriageway. Previously, the layby was retained and proposed to form a short left-turn deceleration lane in to the access. In addition to this change in the access configuration, the proposed pedestrian crossing location has also been revised. In these latest plans the crossing is located further to the west, nearer the access junction.

There has been considerable confusion over the position of the pedestrian crossing, as is evident in the commentary in the HTN and previous LHA responses. The lack of any narrative or description setting out the latest revision to the proposals with these amended plans does not help this. This confusion appears to stem from the HTN02 as initially submitted, including an appended site drawing (3034-01-D02 D) which illustrated a more easterly crossing location (see extracted image below left). This drawing, as can be seen, referred to a Grid Reference to confirm the location of the crossing. However, this Grid Reference was in fact for a more westerly crossing position (see image below right) which is now as presented on the recent amended plans (3034-01-002 F). The previous and 'current' crossing positions are clearly quite different and have significantly different visibility implications.





The confusion over the crossing position is further complicated by the current drawing 3034-01-002 F being dated 'Sep 2021', whilst other amended drawings are dated March 2025.

No narrative to accompany these latest drawings appears to have been provided, but a description of the changes made and a rationale behind these changes would be beneficial. The LHA have attended site and if the current proposed crossing location is as understood (the more western location), this would be considered acceptable and would appear to provide suitable pedestrian intervisibility.

Amended Pedestrian Visibility Plans:
As above. It is noted that this amended plan has also added to the confusion over crossing / junction positioning. Both the amended and previous plans show a car positioned next to a tree on both earlier and current drawings at the 158m visibility point (to the west), despite the amended plan showing the 158m point at 83.607 whilst the original plan showed the 158m plan at point 83.619.

The current proposals retain an uncontrolled pedestrian crossing over the internal access route. Previous versions of the site access junction included an informal deceleration lane configuration. This latest revision of the proposals do not have this detail. There is the potential that vehicles will now be turning left into the site at a greater speed. **The LHA will require this drawing (or a drawing) to show the achievable visibility for a pedestrian at this crossing (eastern side) looking to their right (towards the site access). The forward visibility for a vehicle turning left into the site will also be required to be demonstrated.**

Background Mapping Detail:
On all amended plans on both sides of the carriageway, but particularly on the southern side of the carriageway, the background mapping presents a grey line that runs parallel to what all the

drawings show as the kerb-line / edge of carriageway. In places there is a significant difference between this line and the kerb/edge of carriageway (+/-). **The LHA require confirmation on what this line represents as there is concern that the kerbline/edge of carriageway may not be as shown.**

Amended Site Access Arrangement Plans and Visibility Splays:
Previous LHA comments and applicant responses have resolved the suitability of visibility splays to / from the site access for vehicles, subject to the applicant's commitment to relocate the hedgerow to the west of the site access. This position was reflected by the Planning Inspector in the Appeal decision for the previous application on this site. Should permission be awarded a condition will be required to ensure this verge is maintained regularly to ensure it is kept clear of to safeguard the visibility splay.

From the proposed crossing (north side of the B5102), the pedestrian splays to both the east and west are shown as crossing the highway verge at the back of the footway – especially to the east. This verge is heavily vegetated and seasonally the height and depth of the vegetation may mean that splay is not achievable as shown. Whilst it is accepted that as highway verges, the management of these falls to the Council, the level of maintenance required to maintain the necessary visibility is over and above and more intensive, than the level required for 'normal' maintenance. This therefore places an increased burden on the Council.

Amended Swept Path Assessments
Refuse Collection Vehicle (RCV) swept-paths are presented for internal and external movements. The RCV movements into and out of the site in all cases are shown as being very close to the kerbline with very little apparent safety margin or margin for error. Whilst it is accepted that RCV movements may be infrequent, these movements would place large vehicles very close to pedestrians / cyclists within the site and those waiting to cross at the proposed crossing. It is also noted that the RCV movement around the car park does not connect with the left or right turn out of the site access, with the internal movement finishing at a different physical position to where the left / right turns out of the site start. **For completeness and the avoidance of any doubt, the LHA will require swept-paths for a complete internal circulation and egress as one complete swept-path, with a separate left turn and right turn image.**

The RCV movements within the site demonstrate that to negotiate the western end of the car park, the RCV must over-run and interface with a number of parking bays. This makes clear therefore that refuse collection cannot occur during hours of operation. On this basis the LHA will require by condition, that a Servicing Management Plan be prepared and submitted for approval.

Parking space dimensions and car park isle widths are unclear. **The LHA will require these plans to be updated to show the dimensions of a sample of parking spaces and isle widths.**

Road Safety Audit
Given the number of issues that have been identified above and previously, and the various discussions that have taken place, design evolutions and notwithstanding the Appeal outcome, the LHA are somewhat surprised that the Road Safety Audit (RSA) only references one Issue. In the introduction of the RSA, the audit team note that no formal audit brief was provided by the design team, which is not good practice. The Design Team should provide a brief for the audit – as stated in DMRB GG119 Road Safety Audits. The introduction states that information regarding the site was provided via email alongside the relevant scheme document and drawings. **For completeness the LHA would require copies of the briefing information.** Given the material consideration, it is expected that the Appeal information and Appeal decision and LHA responses would have been made available to the RSA team.

Notwithstanding the above, it is noted that no Designers Response to the Issue identified in the RSA has been provided. **For completeness this should be provided**.

Internal Site Layout:
Cycle Parking Provision – Despite being raised previously, it is noted that the amended site layout does not indicate the location of, nor the quantum of cycle parking that is to be provided. This detail

will be required to be shown. For the avoidance of doubt cycle parking must be provided in accordance with the Council's Local Planning Guidance Note 16 and provided to meet the standards set out in the Welsh Government Active Travel Act Guidance. **An updated plan will be required to show this detail.**

For the avoidance of doubt, regardless of the surface material used within the car park, the access junction mouth from the highway boundary to the access gates must be a formal hardstanding. The LHA will not accept loose unbound material directly adjoining the main carriageway as this represents a potential road safety risk.

Hours of Operation:
While concerns over the visibility/intervisibility of the proposed pedestrian crossing appear to have been addressed, the LHA remain concerned about the safety of intensification of pedestrian activity along the B5102, which is higher speed and without any street lighting. Whilst the suitability, effectiveness and safety of the route has been the subject of much discussion, the use of the route during hours of darkness is a concern. As noted in the Appeal decision, the Inspector outlined a condition to restrict opening times "*as this would ensure the crossing was unlikely to be used after dark*". The LHA would support this and look to ensure that pedestrian safety is not compromised during dark periods.

As noted earlier, should permission be awarded, suitably worded conditions will be required for the following:
- Servicing Management Plan
- Parking Management Plan
- Construction Traffic Management Plan

Conclusion
Whilst the latest amended plans present improved proposals which address a number of the concerns raised previously, the LHA require confirmation and additional information on a number of issues, before a final position can be reached.

KWEdwards
Contracts & Engineering Manager

On behalf of Chief Officer, Environment & Technical