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:	17th December 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

Following review of additional information including Sumner Consultancy Ltd Access Assessment Issue 1 dated 1/10/25 the LHA note the following:

Speed Survey Methodology
The speed survey methodology presented within the report is not considered valid. Speeds were determined by "driving along the road," which is not an appropriate or recognised method for calculating 85th percentile speeds. It is unclear how the quoted figures of 23 mph and 32 mph were derived. To provide robust and reliable data, the applicant should undertake Automatic Traffic Count (ATC) surveys or radar-based speed measurement devices following appropriate guidance. These surveys should be positioned within the visibility envelope.

Visibility and SSD Requirements
There is concern regarding both the adequacy of the visibility splays and the forward Stopping Sight Distance (SSD). The applicant states that although Brymbo Road is subject to a 60 mph limit, it is considered that as it is a lightly trafficked rural road, the visibility requirements in Manual for Streets (MfS) will apply. However, MfS guidance is based on observed 85th percentile speeds, which dictate both lateral visibility splays and forward SSD. The applicant has not provided appropriate speed surveys using a recognised methodology, and therefore the LHA cannot verify the required visibility or SSD. Without empirical speed data, the LHA cannot have confidence that the site can be accessed safely.

X Distance and Set-Back
The LHA would ordinarily only accept a 2.0 metre set-back (X dimension) for a maximum of one or two new dwellings onto C-class or unclassified roads, or in some slow-speed environments where flows on the minor arm are low. This position aligns with Manual for Streets 2 (MfS2), which states that while 2.4 metres is the standard X distance in most built-up situations, a minimum of 2.0 metres may be considered in slow-speed, low-flow contexts. However, using 2.0 metres means the front of some vehicles will protrude into the running carriageway, requiring drivers to cautiously nose out into traffic. In such circumstances, SSD assumptions may not be appropriate, as they do not

account for vehicles partially encroaching into the major road. The proposed set-back therefore requires justification, particularly as the applicant has relied on an inappropriate speed survey methodology and provided no empirical evidence of actual vehicle speeds to support the visibility measurements.

Measurement Methodology and Land Control
While the applicant states that visibility measurements were taken on site, the methodology is not explained, and therefore the accuracy cannot be verified. Photographs in Appendix 6 appear to illustrate the existing visibility at the access, but they do not confirm compliance with required standards. Furthermore, the submitted plans do not indicate the extent of the highway boundary, making it unclear whether the visibility splays cross third-party land. Until accurate speed data is provided, the required visibility splays cannot be confirmed. The applicant must also demonstrate that the visibility splays shown at the proposed set-back are within land under their control or within the highway boundary. Without this confirmation, the LHA cannot be satisfied that the visibility improvements can be delivered and maintained in perpetuity.

Gate and Surface Requirements
The area in front of the gate, where it abuts the highway, must be constructed in a hard-paved material and incorporate drainage to prevent surface water discharging onto the highway. Loose gravel surfacing is unacceptable as it poses a skid risk and can damage the carriageway over time. This requirement is essential to maintain highway safety and prevent deterioration of the road surface.

Swept Path Analysis
The swept path analysis provided in Appendices 9 and 10 does not demonstrate that vehicles can manoeuvre safely within the site. Appendix 9 shows that a car towing a caravan cannot turn around within the site without encroaching into areas that may not be suitable for manoeuvring. Similarly, Appendix 10 indicates a clash between the horse box and the adjoining fence, suggesting that there is insufficient space for larger vehicles to enter and exit the site in a forward gear. This raises concerns about operational safety and potential obstruction of the highway.

Trip Generation
The TRICS assessment undertaken by the applicant is not considered best practice. The selected sites are all classified as “PPS6 Local Centre” and include a site in Sligo, Republic of Ireland, which is not representative of the rural nature of the proposed development. While this approach is flawed, the LHA acknowledges that the scale of the proposal—six caravans—is relatively modest. Even with more appropriate TRICS data, the predicted trip generation would likely remain low, in the order of three to six trips during peak hours. Accordingly, while the methodology is not accepted, the LHA considers the overall trip generation set out by the applicant to be acceptable in this instance. Suggested wording for this position is as follows:

“The applicant’s trip rates have used sites in the Republic of Ireland and all sites are classified as being ‘PPS6 Local Centre,’ which is clearly not representative of the proposed site. This is not best practice for deriving trip generation for a rural development. However, the LHA acknowledges that the site is relatively modest and, despite its rural setting, is unlikely to generate significant volumes of peak-hour vehicle movements. Accordingly, the trip generation set out by the applicant is considered acceptable in this instance.”

Pedestrian Access
The applicant has provided details of local school locations and confirmed that children will be transported by car, with no expectation that they will walk to school or nearby settlements. Given the rural nature of the site and the absence of existing pedestrian infrastructure along Brymbo Road, the LHA recognise that provision of footways or other pedestrian facilities in this instance would not be practical or proportionate for this development. This position reflects the practical constraints and size of this particular development proposal.

Summary
The Local Highway Authority (LHA) reviewed additional information and raised several concerns:

- **Seed Survey:** The current approach to speed measurement does not align with standard practice. It is recommended that ATC or radar-based surveys be undertaken to provide reliable 85th percentile speed data.
- **Visibility & SSD:** Visibility splays and stopping sight distances need to be confirmed using accurate speed data to ensure safe access.
- **Set-Back (X Distance):** The proposed 2.0m set-back could benefit from further justification, as it may affect vehicle positioning relative to the carriageway.
- **Measurement & Land Control:** Clarification on the visibility measurement method and confirmation of land control or highway boundary would help verify compliance.
- **Gate & Surface:** A hard-paved surface with appropriate drainage at the entrance is recommended to maintain highway safety and prevent surface water discharge.
- **Swept Path Analysis:** Additional review of manoeuvring space for vehicles such as caravans and horse boxes would help ensure safe and efficient site access.
- **Trip Generation:** While the TRICS data selection could be refined, the overall trip generation appears reasonable given the modest scale of the proposal.
- **Pedestrian Access:** Considering the rural setting and car-based school transport, pedestrian infrastructure is not considered necessary for this development.

Until the above information is provided, the LHA cannot support the proposals in its current form.

KWEdwards

Contracts & Engineering Manager
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.