MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO:	Jenni Perkins
Our Ref:	ET/DC/PP/P/2025/0300/R2	**Your Ref:**	P/2025/0300
Date:	22/12/2025		

TOWN AND COUNTRY PLANNING ACT 1990

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 in respect of the above.

Following the Local Highway Authority (LHA) Consultation Response (17/10/25) the applicant has submitted further additional information.

As noted in previous comments, the supply of such additional information is helpful, but a narrative explaining what has been submitted and where changes (if any) have been made to information / drawing would help understanding of the information.

It is understood that this additional information comprises:

- Background e-mail dated 12-09-2025
- Copy of Road Safety Audit Briefing
- Road Safety Audit Designers Response
- Long Section Plan
- Background email to LHA on Road Safety Audit
- Proposed Site Access visibility splay

It appears that specific drawings have been revised and reissued as a result of the proposal being updated to remove of the pedestrian crossing over the site access.

The previous LHA response (17/10/25) identified the following points as requiring further information and / or clarification:

- A drawing is required to show the achievable visibility for a pedestrian at the crossing over the site access, positioned on the eastern side looking to their right (towards the site access). This drawing should also show forward visibility for a vehicle turning left into the site.
  The updated information appears to show that the crossing has been removed with the shared footway / cycleway running straight into the site. This comment is therefore superseded.

- Plans should be updated to show the dimensions of a sample of parking spaces and isle widths. **This has been provided and the information shown is acceptable**.

- On all amended site access 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.
  The latest site access drawings no longer show this grey line, but the LHA would request clarification of what this line represented.

- 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 updated information does not address this.

- Cycle Parking Provision – 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.
  The updated information does not address this.

- it is noted that no Designers Response to the issue identified in the RSA has been provided. For completeness this should be provided.
  This has been provided and the information shown is acceptable.

- **The LHA require copies of the Road Safety Audit 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.
  This has been provided and whilst it is noted no formal brief was prepared and not in the format that GG119 requires, necessary background information was made available to the Audit team.

General Comments
As noted previously, the Refuse Collection vehicle 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.

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 remains 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