Our Ref: 3034-01/LK6

13 January 2026

By email only:

FAO Jenni Perkins
Wrexham Borough Council
16 Lord Street
Wrexham
LL11 1LG

Dear Jenni

PROPOSED CHRISTMAS FARM, LAND TO THE SOUTH OF LLAY ROAD, CEFN-Y-BEDD, WREXHAM

PLANNING APPLICATION REFERENCE P/2025/0300

Introduction

I refer to the most recent consultation response from the Local Highway Authority (LHA) dated 22nd December 2025 in respect of the above planning application, enclosed with this letter for ease of reference.

This letter seeks to provide a response to the outstanding matters raised, and generally covers the same sequence and structure of matters as those presented in the latest LHA comments.

Drawing Changes / Evolution

It is noted that the LHA have requested a narrative explaining where changes have been made to information / drawings.

In response:-

1. Our previous letter dated 10th November 2025 included the latest proposed site access drawing (Drawing 3034-01-D02 Rev H). The evolution of the revisions to this drawing are as follows:-

   i. The site access drawing submitted with the second (and current) planning application was revision D, and was effectively the same drawing that was considered at the end of the previous planning application and Appeal (which was revision C). The only change was that the drawing border was updated to reflect Axis' refreshed branding / drawing templates.
   ii. The drawing was then changed to revision E on 21st July 2025, following our site meeting with the LHA during the week before. This was issued by email to the LHA on 23rd July 2025, and included the following changes:-
      a) More recent OS mapping to help better cross reference to existing features
      b) Removed the grey hatching on the previous drawing to help see the existing features better
      c) Slight shortening of the left turn lane so the crossing did not go across it

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d) Addition of centreline hatching to the minor arm to help encourage slower turn in speeds and further improve right-turning visibility

iii. Revision F of the drawing was then produced as a result of the observations made by the LHA and following a further site visit to mark out the position of the access centreline and pedestrian crossing. At that site visit, we came to realise that the field boundary hedgerow on the other side of Llay Road does not properly follow the line of the adopted highway boundary corridor – the hedge line follows a skewed alignment and transgresses into what should be the highway verge at a critical point. This thereby impinges on the intervisibility for right turning traffic shown on revision E of the drawing. The access design was therefore slightly repositioned and simplified (the left turn lane was removed), and this was sent to the Road Safety Auditor on 15th August 2025.

iv. Following receipt of the Road Safety Audit, revision G of the drawing was produced on 11th September 2025 and included a single change – a note regarding the addition of a protective barrier to prevent pedestrians falling into the ditch near the access.

v. Revision H was produced on 4th November 2025 and was prepared in response to the Council's comments dated 17th October 2025. The changes on revision H included:-
   a) Addition of dimensions for the parking spaces
   b) Removal of grey lines associated with the LIDAR mapping, to avoid confusion
   c) Junction visibility splays changed from yellow to magenta colour to improve readability of the drawing
   d) Removal of the internal pedestrian crossing and extension of south-eastern footway further into the site instead
   e) Very minor associated adjustments to the markings, the western corner radius of the junction and the proposed fence-line

2. The latest swept path assessment plan (Drawing Number 3034-01-ATR01 Rev F), enclosed with our previous letter, was updated to reflect the site access changes and the previous LHA comments (dated 17th October 2025) that requested a single swept path manoeuvre to be shown of a refuse collection vehicle (RCV). See below.

3. Our previous letter dated 10th November 2025 also included the latest revision to our long section drawing (Drawing Number 3034-01-D04 Rev C). The location of the cars and trees on that drawing were reviewed and rationalised in improve accuracy and to improve the ability for the Council to cross reference the features in the vertical and horizontal planes. The substance of that drawing (i.e. demonstrating the feasibility of visibility splays in the vertical plane) remained the same as it was previously.

Mapping Changes

As mentioned above and in our previous letter, the latest proposed site access drawing (Drawing 3034-01-D02 Rev H) was revised to remove confusing grey line entities associated with the LIDAR mapping. Only the OS mastermapping now underpins the latest drawing.

Swept Path Assessment

In response to the latest comments on the swept path assessments:-

1. It is noted that the LHA have reiterated their previous comments, from 17th October 2025, about the need to show a swept path manoeuvre of a RCV undertaking a complete internal circulation of the car park, including entry / exit and left and right turn out images.

2. This was already addressed on the latest swept path assessment drawing (Drawing Number 3034-01-ATR01 Rev F) enclosed with our previous response dated 10th November 2025. That drawing shows the single swept path manoeuvres in the two top left viewports.

3. For ease of reference, this drawing is enclosed again with this letter.

4. It is accepted that a planning condition can be applied that refuse collection cannot occur during hours of operation and that a Servicing Management Plan can be conditioned as part of any grant of planning permission.

Cycle Parking Provision

In response to the comments on cycle parking:-

1. As mentioned in our previous letter dated 10th November 2025, there is ample room within the site to provide suitable cycle parking provision that accords with the Council's Local Planning Guidance Note 16 and which meets the standards set out in the Welsh Government Active Travel Act Guidance.

2. It is considered that the details of the cycle parking can be secured by planning condition and that there should be no requirement to show this on a plan now. There is no reason, given the size of the site, to suggest that such a planning condition could not be satisfactorily discharged.

Junction Bellmouth Surfacing

It is accepted that, if the scheme is granted approval, the ~16m+ section of the site access junction from the give way line with Llay Road to the access gates will feature a sealed surface treatment of hardstanding.

Hours of Operation

In response to the comments on the hours of operation being limited to daylight hours, this is accepted by the Applicant and can be secured by planning condition.

I trust this is of assistance and would be grateful if the LHA could confirm whether the scheme is now acceptable and can be recommended for conditional approval.

Subject to this, we would be happy to revise the other drawings within the submitted drawing package, where needed, to account for the most recent revisions to the proposed site access arrangements.

Yours faithfully

[redacted]

Lee Kendall

Technical Director on behalf of Axis

Enc: Enclosure 1 – LHA Response Dated 22nd December 2025
Enclosure 2 – Drawing Number 3034-01-ATR01 Rev F

Enclosure 1 - LHA Response Dated 22nd December 2025

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

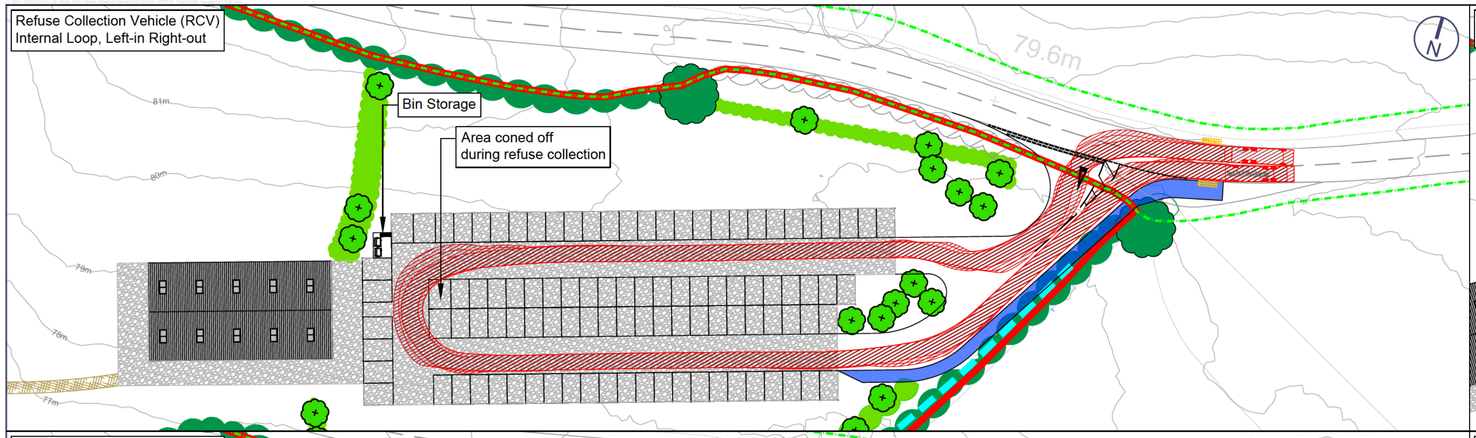
Conclusion
Whilst the latest amended plans present improved proposals which address a number of the concerns raised previously, the LHA require confirmation and additional information on a number of issues, before a final position can be reached.

KWEdwards
Contracts & Engineering Manager

On behalf of Chief Officer, Environment & Technical

Enclosure 2 – Drawing Number 3034-01-ATR01 Rev F

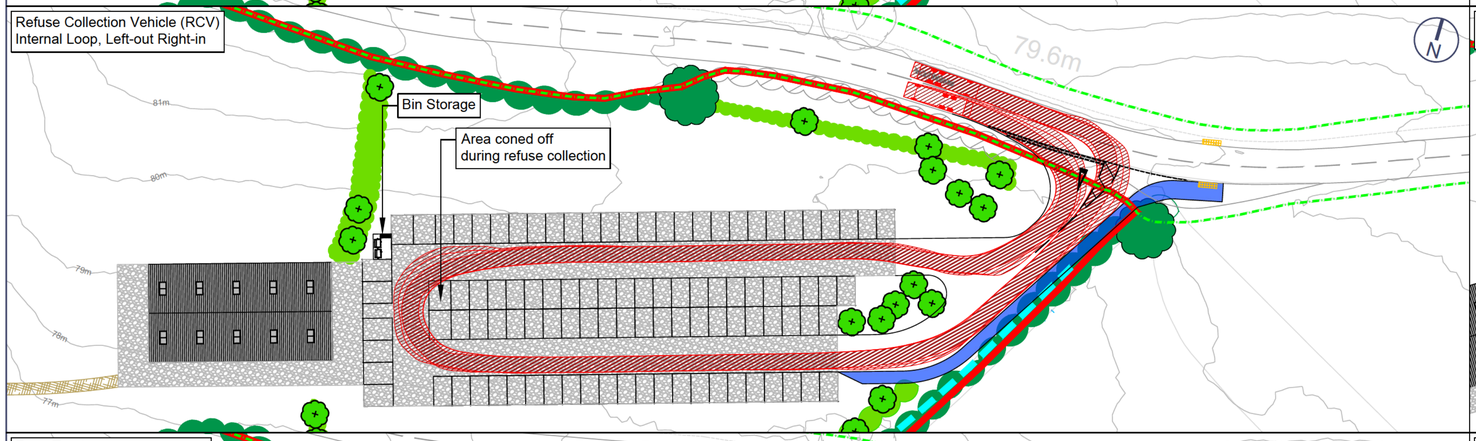
Refuse Collection Vehicle (RCV)
Internal Loop, Left-in Right-out



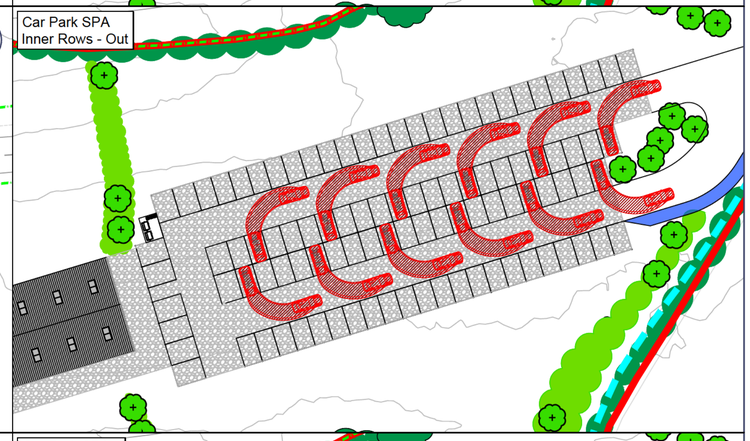
Car Park SPA
Inner Rows - In



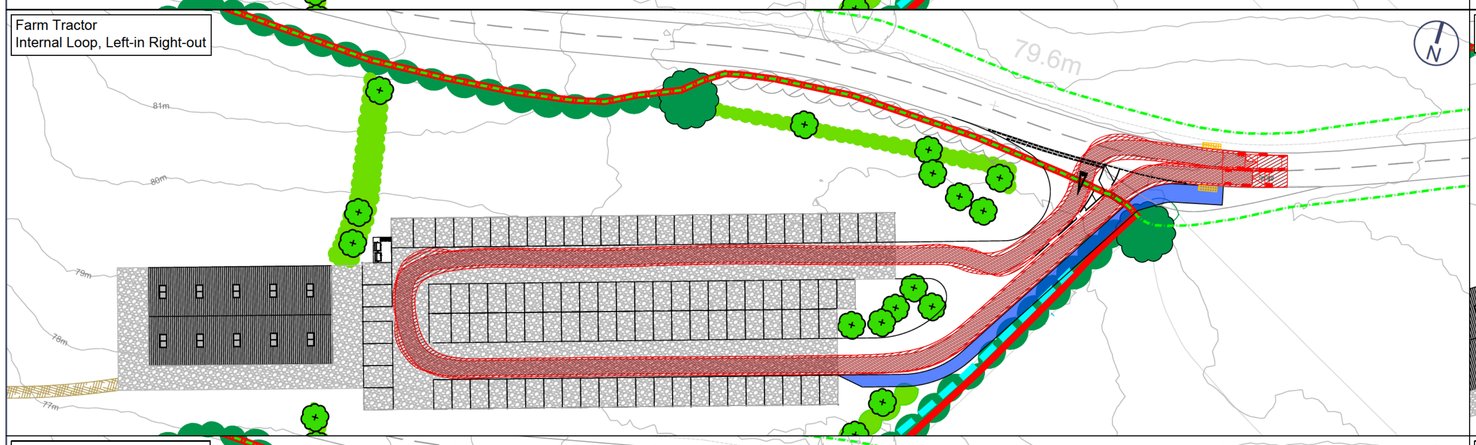
Refuse Collection Vehicle (RCV)
Internal Loop, Left-out Right-in



Car Park SPA
Inner Rows - Out



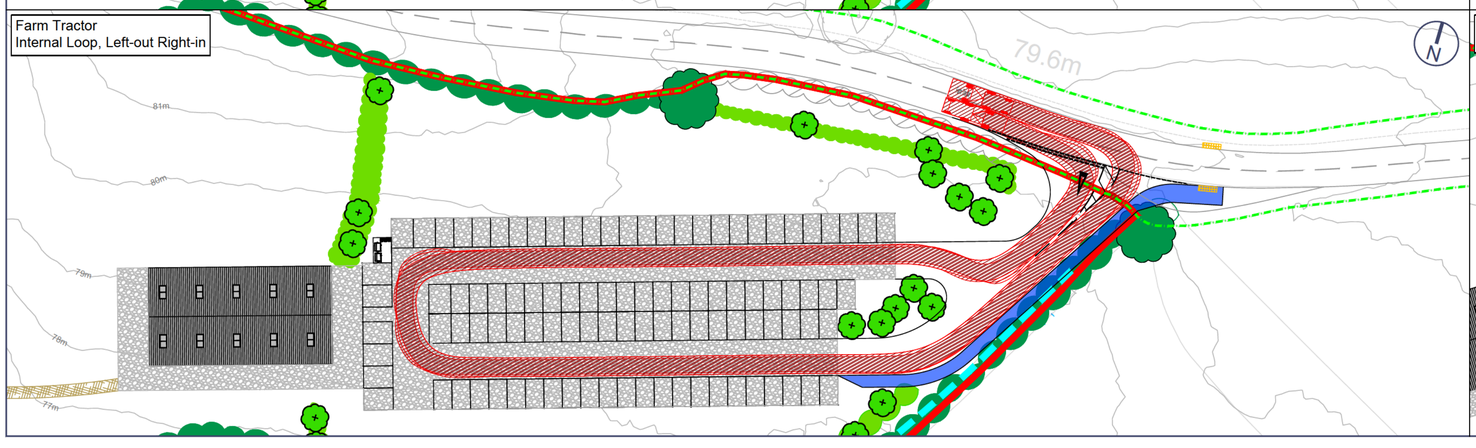
Farm Tractor
Internal Loop, Left-in Right-out



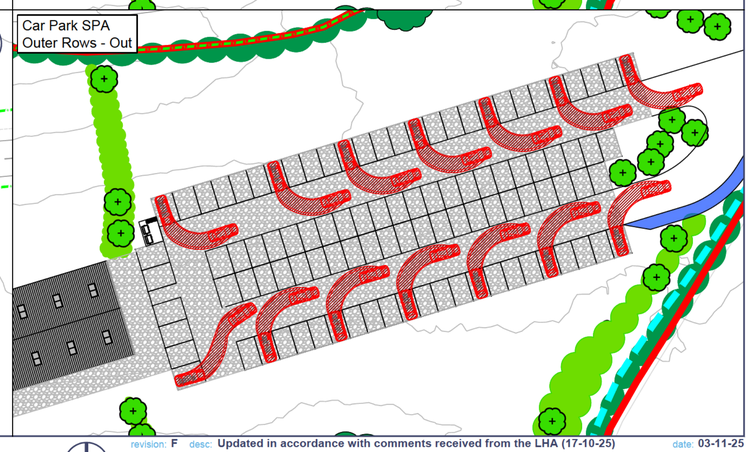
Car Park SPA
Outer Rows - In



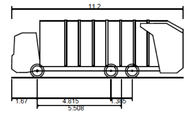
Farm Tractor
Internal Loop, Left-out Right-in



Car Park SPA
Outer Rows - Out

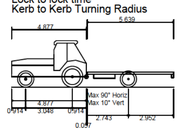


- Site Boundary
- Highway Boundary
- Public Right of Way (Llay 12)
- Existing tree, retained
- Existing woodland/ hedgerow/ scrub, retained
- Existing hedgerow, removed
- Proposed tree
- Proposed woodland/ hedgerow/ scrub



Phoenix 2 Duo (P2-15W with Elite 6x4 chassis)

Overall Length	11.200m
Overall Width	2.530m
Overall Body Height	3.751m
Min Body Ground Clearance	0.304m
Track Width	2.500m
Lock to lock time	4.00s
Kerb to Kerb Turning Radius	9.500m



Farm Tractor

Overall Length	10.572m
Overall Width	3.048m
Overall Body Height	3.048m
Min Body Ground Clearance	0.588m
Max Track Width	3.048m
Lock to lock time	4.00s
Kerb to Kerb Turning Radius	5.700m



Jaguar S-Type

Overall Length	4.939m
Overall Width	1.878m
Overall Body Height	1.474m
Min Body Ground Clearance	0.259m
Max Track Width	1.544m
Lock to lock time	4.00s
Kerb to Kerb Turning Radius	6.000m

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revision: F desc: Updated in accordance with comments received from the LHA (17-10-25) date: 03-11-25

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axis.co.uk

Client
Christmas Farm

Project
Christmas Farm, Llay Road, Cefn-y-Bedd

Drawing Title
Swept Path Assessment Plan

Scale	Status
1:500 @A1	Preliminary

Date	Drawn	Checked
Sep 2021	MK	LK

Dwg no	Rev
3034-01-ATR01	F