MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO::	Sharon Holman
Our Ref:	ET/DC/AC/P/2025/0925	**Your Ref:**	P/2025/0925
Date:	23/02/2025		

TOWN AND COUNTRY PLANNING ACT 1990

PROPSAL: CHANGE OF USE OF BUILDING FROM CLASS C2 (CARE HOME/SUPPORTED LIVING) TO CLASS SUI GENERIS (HOUSE IN MULTIPLE OCCUPATION (HMO)) / NEWID DEFNYDD ADEILAD O DDOSBARTH C2 (CARTREF GOFAL/BYW Â CHYMORTH) I DDOSBARTH SUI GENERIS (TY MEWN AML-FEDDIANNAETH (HMO))

LOCATION: OAK ALYN HALL, CEFN Y BEDD, WREXHAM, LL12 9US

I refer to your consultation / email in respect of the above.

The Local Highway Authority (LHA) has reviewed the submitted planning application and the accompanying documents, including the Planning Statement and the existing and proposed plans. Based on the information currently provided, the LHA is unable to support the application at this time. This position arises from the absence of essential transport-related assessment work, which prevents a full understanding of the likely impacts of the proposed development. The LHA has determined that a Transport Statement (TS) is required.

A Transport Statement is necessary to assess the transport and highway implications of developments that generate additional or altered movement patterns, in accordance with national guidance set out in TAN18, which advises that such documents are needed for developments generating non-negligible trip activity.

The submission does not currently include sufficient information for the LHA to assess:

- Whether the change in use will materially alter vehicular, pedestrian, cycle or servicing demand;
- Whether the surrounding highway network can accommodate those demands;
- Whether mitigation measures are required.

The TS will be fundamental for the LHA to assess the suitability and sustainability of the site in transport terms. It should set out how the development aligns with sustainable travel objectives, provide an appraisal of the parking arrangements, examine likely multi-modal trip generation, and compare the transport impacts of the proposed HMO use with those of the site's lawful fallback position as a Class C2 care home and undertake detailed highway capacity assessments if appropriate. It is recommended that the applicant employs a transportation specialist to prepare the document.

The TS should as a minimum include the following key areas:

Introduction & Development Context

The TS must clearly set out the proposed change in use, explaining the site's previous lawful operation as a C2 care home and the details of the proposed HMO configuration, including the number of rooms, anticipated occupancy levels, and the facilities to be provided. This establishes the context for understanding how the nature and scale of activity at the site is expected to change.

The TS should also provide a justification for the proportionate level of assessment, recognising that a TS is the appropriate tool where predicted transport impacts are limited but still require formal evaluation. National guidance makes clear that Transport Statements are intended to assess and mitigate transport impacts in a proportionate manner, ensuring that even smaller or lower-impact developments are supported by evidence-based transport analysis.

Existing Conditions (Baseline)

To assess the net impact of the proposed change of use, the TS must provide a detailed description of the existing lawful C2 use, even though the care home is no longer operational. The fact that the building is currently closed does not alter the lawful planning status of the site, and the TS must therefore explain the site context and physical characteristics associated with that established use. This should include a site location plan showing the relationship of the property to the surrounding highway network, as well as a clear description of the existing access arrangements, including access width, visibility, any physical constraints, and how the site was previously serviced, for example, staff parking, deliveries, and access for ambulances or medical professionals.

In addition, the TS must establish baseline transport conditions associated with the former care home use, drawing on reasonable evidence of typical C2 trip patterns. Although the site is currently inactive, the assessment must identify the kinds of movements normally generated by such a use, including staff shift patterns, visitor activity, and trips by medical or supply professionals. The TS must also describe existing pedestrian and cycle movements and the facilities available to support them, along with public transport provision in the area, such as bus and rail access, frequencies, and walking distances to relevant stops. It should further set out the functional classification of surrounding roads, any operational restrictions, and provide a review of collision data for the most recent three to five years on the local highway network around the site access. These baseline elements reflect industry-standard expectations for Transport Statements and are necessary to establish an appropriate comparison against the proposed HMO use.

Sustainable Access

The Planning Statement submitted with the application makes only high-level assertions relating to pedestrian accessibility and public transport links, but it does not provide any supporting assessment or evidence. The comprehensive TS is therefore required to identify the accessibility of key services on foot and by cycle, to map the location and frequency of nearby public transport services, and to evaluate realistic opportunities to reduce reliance on private cars. This assessment must include a review of existing infrastructure, demonstrating, based on actual route quality and continuity that pedestrians and cyclists can access the site safely and without undue risk or difficulty. Without such analysis, the LHA cannot accept high-level claims regarding sustainable access as being robust or reliable.

The TS must also set out appropriate measures to promote sustainable travel among future residents to ensure that the proposed HMO aligns with both local and national sustainable transport policy objectives. This includes providing a detailed appraisal of pedestrian routes and footway quality, cycle connectivity in the surrounding area, and confirmation that secure, well-designed on-site cycle storage will be provided. A thorough assessment of bus and rail access is required, including service frequency and the overall quality and reliability of available public transport options. The TS must also address whether the site is suitable for low-car or no-car occupation, supported by evidence on local travel choices and infrastructure. These requirements reflect established national policy expectations that Transport Statements not only assess transport impacts but actively demonstrate how developments can support and promote reduced car dependency.

Proposed HMO Development Description

A clear and fully quantified description of the proposed HMO use must be provided within the TS, as the information submitted to date lacks sufficient detail for the LHA to understand how the development will function. The TS must specify the total number of bedrooms and anticipated occupants and should be supported by plans demonstrating how cycle parking and on-site vehicle parking will operate. Car parking provision should be provided in line with the **Wrexham County Borough Council's adopted Parking Standards (Local Planning Guidance Note 16)**. This document sets out the maximum parking requirements for residential uses including HMOs and although these are maximum, the LHA view is the maximum number of spaces should be provided given the location of the site. The proposed layout plan show 11 car parking spaces including 3 disabled bays will be provided which is a shortfall of two spaces.

The TS must also provide a clear explanation of the proposed access arrangements for pedestrians, cyclists and vehicles. This includes demonstrating that residents and visitors can enter, move within and exit the site safely and efficiently. The current submission does not contain adequate information to confirm that the parking layout will operate safely in practice. Swept-path assessments must therefore be provided to show that cars, delivery vans, and where, applicable larger vehicles can manoeuvre within the site in forward gear without overrunning footways, blocking cycle parking, or creating conflict points within the parking court. This evidence is essential, particularly in circumstances where the applicant seeks to provide fewer parking spaces than the LPG16 maximum standards. Any reduction must be justified through a combination of sustainability evidence and geometric proof that the reduced parking layout still functions safely and without compromising access.

The application also fails to explain how the site will be serviced, including how refuse and recycling collections will be managed. Refuse collection arrangements must also be fully described, including the location of bin stores, the route for transferring bins to the collection point and the manoeuvrability of refuse collection vehicles. Swept-path evidence is required to confirm that refuse vehicles can safely access the collection point, or, if required, enter and manoeuvre within the site. Without this detailed servicing and movement information, the LHA cannot be satisfied that the development can be serviced safely or without adverse effects on the public highway.

Trip Generation & Mode Split (Care Home & HMO Comparison)

The change from a care home to an HMO represents a significant shift in the way the site is likely to be used. A care home typically generates trips associated with shift-based staffing, visiting medical professionals, regular deliveries, and visits from family and friends, alongside occasional specialist transport movements for residents. Even though the building is currently vacant, its lawful use as a C2 care home should be used as the basis for comparison.

The TS is required to set out the typical trip rates associated with the existing extant use, drawing on TRICS or other accepted data sources to identify peak-hour vehicle movements, daily traffic flows, staff arrival and departure patterns, visitor trips, and the frequency and nature of deliveries. The TS must then establish the expected trip generation for the proposed HMO use. HMOs generally generate higher levels of vehicle and non-vehicle trips per resident, with occupants more likely to travel independently and throughout a broader range of hours.

Once both sets of data are established, the TS must present a clear net impact assessment. This should explain whether the HMO use would result in an overall increase in movements, whether peak-hour impacts would change, whether parking demand would exceed on-site capacity, and whether different patterns of movement could affect road safety, highway operation or increase on-street parking pressures. Without this comparative analysis, the LHA cannot determine the likely transport impact.

Highway Network Impact Assessment

The TS must assess whether the proposed change of use from a care home to an HMO will materially alter how the surrounding highway network operates. A key part of this assessment is determining whether the development will increase parking demand beyond what can be safely accommodated either within the site or on the surrounding highway network. This requires an

evidence-based comparison between existing parking pressures and the expected level of car ownership and vehicle activity generated by the HMO. Without this analysis, it will not be possible to establish whether the development may lead to overspill parking, conflict with neighbouring properties or result in operational difficulties within the internal parking layout.

The TS must also consider whether the change in use is likely to increase traffic at sensitive times of the day, such as evenings and weekends. HMO residents typically follow more varied working patterns compared with care-home operations, potentially resulting in increased late-evening arrivals, early-morning departures and weekend activity. These patterns can generate different impacts on the local road network than those associated with the former C2 use, and the TS must identify whether this would alter peak-hour conditions, contribute to congestion, or create additional vehicle movements at times when the local network may already be constrained.

Furthermore, the TS must assess whether the proposed use could create new safety risks or exacerbate any existing issues identified in the collision analysis. This includes evaluating whether changes in access frequency, turning movements, parking behaviour or pedestrian/cycle activity could increase risk at or near the site access. The assessment must consider both the operational characteristics of the HMO and the historic collision record on the surrounding network to determine whether additional mitigation or design amendments are necessary to ensure that highway safety is not compromised.

Summary

The Local Highway Authority (LHA) has reviewed the planning application for the proposed change of use from a C2 care home/supported living facility to a Sui Generis HMO at Oak Alyn Hall, Cefn-y-Bedd, Wrexham. Based on the submitted information, the LHA cannot support the application at this stage without a comprehensive Transport Statement addressing all the above matters.

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.