MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO:	Philip Mullineux
Our Ref:	ET/DC/AC/P/2025/0431	**Your Ref:**	P/2025/0431 Response 3
Date:	18/05/2026		

TOWN AND COUNTRY PLANNING ACT 1990

PROPOSAL: NEWID DEFNYDD TIR O AMAETHYDDIAETH I ARDALOEDD LLINIARU ECOLEGOL YNGHYD AG ADEILADU BYNDIAU / CHANGE OF USE OF LAND FROM AGRICULTURE TO ECOLOGICAL MITIGATION AREAS TOGETHER WITH CONSTRUCTION OF BUNDS

LOCATION: LAND OFF, FRANCIS LANE, RIDLEY WOOD, WREXHAM, LL13 9YB

The Local Highway Authority (LHA) initially requested comprehensive clarification across all sites in respect of access arrangements for both the construction and operational phases, detailed access geometry (including width, surfacing, visibility splays and gate positions), vehicle types and numbers, routing, parking and turning arrangements, any necessary access improvements or passing bays, and the impact on Public Rights of Way.

In response, the applicant has submitted a Technical Note structured by site and phase, identifying the proposed access points and providing information on anticipated vehicle movements, including quantified HGV traffic associated with bund construction. Drawings have been included to illustrate access arrangements and visibility splays, and it is indicated that further detail could be secured through a Construction Management Plan (CMP).

Overall, whilst the submission seeks to address the original request, it remains high-level in nature and does not adequately demonstrate that safe and suitable access arrangements can be delivered in practice. Key elements rely on assumptions or mitigation to be secured at a later stage, rather than being fully evidenced within the submitted information.

Francis Lane Site (Phase 1A – Northern Mitigation Area)
The LHA requested clarification of the access arrangement, full access design details, and a resolution to the significant shortfall in visibility splays, previously identified as approximately 2.4m x 7m compared to a requirement of 2.4m x 120m. Further information was also requested in respect of vehicle movements, parking and turning arrangements, potential passing provision, and any Public Rights of Way impacts.

The applicant confirms that access will be taken from an existing field entrance off Hugmore Lane, with construction activity limited to light vehicles, typically one to two per day. Visibility splays of 2.4m x 120m are proposed to be achieved through hedgerow trimming and ongoing maintenance. It is stated that passing bays are not required at this stage, although the situation will be monitored. No Public Rights of Way are identified within the site.

Whilst the submission clarifies the proposed point of access and provides an indication of likely vehicle activity, no access design has been provided. In particular, there is no information relating to

access construction, surfacing, drainage, or formalised parking and turning arrangements. Furthermore, the proposed visibility improvements rely on vegetation management, with no evidence provided to demonstrate that the required splays can be achieved within land under the applicant's control or maintained in the long term.

Accordingly, the information submitted is not sufficient to fully address the LHA's concerns. Should planning permission be granted, full details of the access design and construction, including visibility splays, surfacing, drainage, and turning arrangements, will need to be submitted to and approved in writing by the Local Highway Authority prior to the commencement of development.

B5130 Holt Road Site (Phase 2 – Southern Mitigation Area)
The LHA requested confirmation of access arrangements, measures to address substandard visibility in one direction, detailed vehicle movement information, potential access improvements, and clarification of any Public Rights of Way impacts.

The applicant proposes to utilise the existing 4.5m wide field access and to achieve visibility splays of 2.4m x 43m through hedgerow trimming. Construction activity is split between light vehicles for ecological works and HGV traffic associated with bund construction. The latter is quantified as approximately 2,026 HGV arrivals (circa 4,052 two-way movements) over a three-month period, with peak activity estimated at up to three HGV arrivals per hour and a maximum of 68 daily two-way HGV trips. No passing bays are proposed. A Construction Management Plan is identified as the mechanism for managing construction traffic.

Whilst quantified traffic data has been provided, no access design has been submitted. In particular, there is an absence of information relating to access construction, surfacing, drainage, and formalised parking and turning arrangements, together with full dimensional details. The level of HGV activity is material in the context of the rural highway network, and no detailed routing strategy or assessment of the wider highway impact has been undertaken.

The proposed visibility improvements again rely on vegetation management, with no evidence provided to demonstrate that the required splays can be achieved and maintained. The mitigation approach is largely deferred to a future Construction Management Plan. Should permission be granted, a detailed CMP will be required and must be submitted to and agreed in writing prior to commencement. This should include construction routing, traffic management measures, timing controls, and parking/turning arrangements. A full access design, including all dimensions and supported by an appropriate Road Safety Audit, will also be required prior to development commencing.

Maesgwyn Lane Site (Phase 1B)
The LHA requested clarification on whether the site would be accessed and, if so, how safe access could be achieved given the limited visibility available.

The applicant has confirmed that no physical works are proposed and that the land will remain in agricultural or ecological management use. On this basis, no access details have been provided.

The absence of construction activity is noted; however, it is considered likely that some level of access will still be required for maintenance purposes. No information has been provided to demonstrate how such access can be safely achieved. This matter remains unresolved.

B5130 Holt Road Site (Phases 1B, 2 and 3)
The LHA requested clarification of the shared access arrangements, improvements to visibility (noting the current splay isapproximately 2.4m x 12m), full details of HGV movements, and confirmation of any mitigation, together with consideration of Public Rights of Way.

The applicant proposes to utilise an existing 3.7m wide access with a 6.3m set-back, with an additional access available if required. Visibility splays of 2.4m x 25m are proposed, achieved through hedgerow management and minor white-lining alterations to reposition the give-way line. Construction traffic includes significant HGV activity, with approximately 3,034 arrivals (circa 6,068

two-way movements) over a four-month period. A Public Right of Way is identified and would be retained and managed through the CMP.

Whilst a detailed response has been provided, the proposed mitigation is limited to minor white lining, and no Road Safety Audit has been submitted to demonstrate its suitability. In addition, no detailed access design has been provided. The submission lacks full dimensional information relating to the access layout and construction.

Visibility improvements remain dependent on vegetation management, with no confirmation of deliverability where third-party constraints may apply. The scale of HGV movements is also significant, and no assessment has been provided of the impact on the wider network. The proximity of St Paul's V.A. Primary School is noted, and the timing of HGV movements will require careful control to avoid school peak periods.

Overall, key highway safety considerations have not been fully demonstrated.

Summary and Conclusion
Whilst the applicant has submitted additional information, the proposals remain lacking in the necessary detail to demonstrate that safe and suitable access arrangements can be achieved and maintained.

The deliverability of visibility splays has not been robustly evidenced, with reliance placed on vegetation management without confirmation of land control or long-term maintenance. In addition, no detailed access designs have been provided, and there is limited information relating to access construction, geometry, drainage, and operational arrangements, including parking and turning.

Construction traffic impacts have been quantified; however, the wider effects on the highway network have not been fully assessed. Whilst indicative routing has been provided, the cumulative impact of HGV movements across all sites and phases has not been considered in a comprehensive manner. Given the scale and overlap of construction activity, this is a significant omission.

The routing and control of HGV movements will therefore be critical. Should planning permission be granted, this must be addressed through a detailed Construction Management Plan to be agreed with the Local Highway Authority prior to commencement. This should define construction traffic routes, restrict use of unsuitable roads, control the timing of movements, and include measures to manage the cumulative impact of HGV traffic across all phases of development.

Accordingly, further information and control measures are required before it can be demonstrated that the development would not have an unacceptable impact on highway safety or the operation of the local road network.

KWEdwards
Contracts & Engineering Manager

On behalf of the Chief Officer, Environment & Technical

Conditions

Construction Traffic Management Plan (CTMP)
No part of the development shall commence until a detailed Construction Traffic Management Plan (CTMP) has been submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be carried out in full accordance with the approved CTMP.

The CTMP shall include, but not be limited to:

- Provisions for the safe and efficient management of all construction vehicle movements, including access to and from each site parcel;
- A detailed construction programme and agreed methods of working;
- Defined construction traffic routes to, from, and between the sites, including restrictions on the use of unsuitable local roads and measures to manage cumulative traffic impacts across all phases;
- Measures to ensure that bus services and refuse collection operations are maintained at all times;
- Details of any required road closures, with evidence of agreement from emergency services and relevant stakeholders;
- Detailed arrangements for contractor parking, loading and unloading, to ensure no parking or obstruction occurs on the public highway;
- Provision and management of appropriate wheel washing facilities to prevent debris being carried onto the highway;
- Details of traffic management measures to control the timing and routing of HGV movements, including avoidance of sensitive periods such as school pick-up and drop-off times;
- Full details of temporary and permanent access arrangements to be used during construction.

The CTMP shall also include a **full access design for each point of access**, to include:

- Detailed engineering drawings with all dimensions;
- Access geometry, construction specification, and surfacing materials;
- Drainage arrangements to prevent water discharging onto the public highway;
- Visibility splays and confirmation of their delivery and ongoing maintenance;
- Swept path analysis (vehicle tracking) demonstrating that the largest anticipated vehicles, including HGVs, can safely enter, exit, turn within the site, and operate without impacting the public highway.

The CTMP must reflect and align with any Section 50 licence application(s) and other relevant highway agreements.

Reason: In the interests of highway safety and to ensure the free flow of traffic on the adjoining highway network.

Highway Dilapidation Survey
A detailed dilapidation survey of all sections of the public highway likely to be affected by the development shall be undertaken prior to the commencement of works and submitted to the Local Highway Authority for approval. The survey shall record the existing condition of the carriageway, verges, footways, and any highway structures.

A corresponding post-construction survey shall be submitted to the Local Highway Authority within one month of the completion of the construction works. Any damage identified that is attributable to the development shall be made good at the expense of the developer, in accordance with a scheme to be agreed with the Local Highway Authority.

Reason: In the interests of maintaining the structural integrity, safety, and operation of the public highway.

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.