26/07/2026

Your REF:P/2025/0854

Description

CHANGE OF USE OF LAND TO CREATE GLAMPING SITE (SEVEN UNITS)

Site Address

LAND SOUTH OF QUEENSBRIDGE FARM, OVERTON, WREXHAM, LL13 0LE

Dear Jenni,

I write in response to the consultation comments received from the Tree Officer, Natural Resources Wales and the Highway Authority following our previous submission.

I would like to thank all consultees for the time and care they have taken in reviewing this application. Throughout the process we have sought to work collaboratively with the Local Planning Authority and each statutory consultee to ensure the proposal responds positively to the comments received. We are grateful for the constructive approach that has been taken and hope this submission demonstrates our continued commitment to delivering the best possible scheme for the site and the wider area.

Since the previous submission the application has been reviewed by our specialist consultants and further amendments have been made to address the outstanding consultation comments.

Summary of Amendments

The principal amendments submitted with this application are summarised below:

- Updated Arboricultural Method Statement (AMS), Tree Protection Plan (TPP) and Arboricultural Impact Assessment (AIA).
- Revised architect proposals confirming the use of a sealed containment system and updating the red outline of the site.
- Updated Transport Technical Note prepared by Brian Laird of Stantec.
- GLTA letter prepared by the project ecologist.

Taken together, these amendments represent a significant refinement of the proposal and demonstrate the applicant's willingness to continue improving the scheme throughout the application process.

Tree Officer

We would like to thank the Tree Officer for the constructive comments provided.

The requested amendments have now been incorporated into the revised landscape proposals, including the removal of Blackthorn from the planting schedule and the redistribution of the remaining native species.

Following the subsequent highway amendments, the accompanying Arboricultural Method Statement, Tree Protection Plan and Arboricultural Impact Assessment have also been updated to reflect the revised layout.

We trust these amendments satisfactorily address the matters previously raised.

Natural Resources Wales

We would also like to thank Rachel Burke for her continued assistance throughout the application.

The architect's drawings have now been amended to clarify that hot tub water will discharge to a “sealed containment system” rather than directly to the treatment plant.

NRW advised that the lighting strategy should be secured by condition, we have nevertheless looked into a lighting consultant accredited through the Institute of Lighting Professionals to prepare the necessary assessment following any grant of planning permission. This demonstrates our commitment to ensuring the development remains fully compliant with ecological requirements throughout its implementation. Should planning permission be granted, the applicant would be pleased to submit the detailed lighting assessment in accordance with any planning condition imposed by the Local Planning Authority.

Revised drawings prepared by Matt Wood accompany this submission.

Highway Authority

Following receipt of the Highway Authority's latest consultation response we again instructed Brian Laird, Technical Director at Stantec, to undertake a detailed review of the comments raised.

Brian's accompanying Transport Technical Note provides a comprehensive technical response and should be read alongside this covering letter.

Whilst the applicant and Stantec remain of the opinion that the previously submitted highway solution represented an acceptable arrangement, further work has nevertheless been undertaken to respond positively to the Highway Authority's comments and to maximise the level of highway improvement that can reasonably be achieved.

Tree Diameter

The comments regarding the diameter of the existing tree have been reviewed.

Both the original topographical survey and subsequent site measurements confirm that, irrespective of whether the tree is measured at approximately 1.0m or 1.2m in diameter, the proposed visibility splay remains unaffected.

The accompanying Transport Technical Note provides the supporting technical assessment.

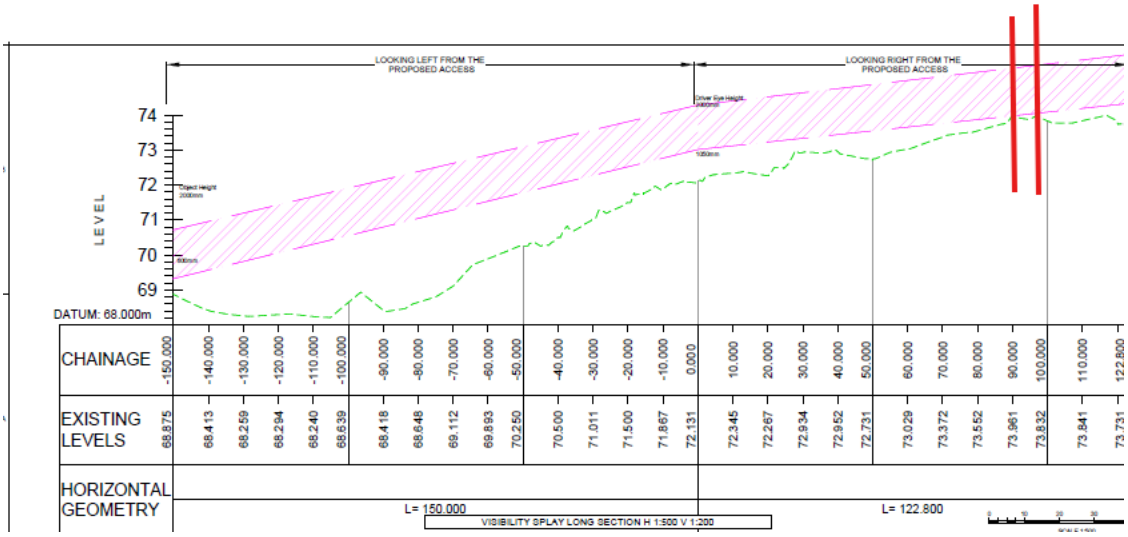
Highway Engineering

The Highway Authority queried whether a third-party agreement would be required to achieve the proposed visibility splays.

In its consultation response, the Highway Authority confirmed that TAN 18 remains the prevailing planning guidance. As explained in the accompanying Transport Technical Note, TAN 18 does not prescribe a driver eye height or identify a supporting document from which such a value should be derived. The Technical Note therefore responds in detail to the Highway Authority's observations regarding the visibility envelope and accompanying cross-section drawings.

Following a review of the topographical survey, detailed site measurements and highway cross-sections, Stantec concludes that the available visibility can be achieved without any alteration to the alignment or profile of Queensbridge Lane, the existing ground levels or the shared private driveway. The accompanying survey information and annotated cross-sections demonstrate that the proposed 122.8m northern visibility splay can be achieved without engineering works or physical alterations to adjoining land.

The red lines below indicate the lane position-



Legal Status of the Route-

To clarify the legal status of the route over which the proposed visibility splay passes, further advice was sought from Sean Hanratty, Senior Definitive Map Officer at Wrexham County Borough Council. Mr Hanratty confirmed that there is no recorded legal width for Overton Footpath 34 and advised that:

"there is presently no evidence in the Definitive Map and Statement identifying only part of the lane as being subject to public rights, or restricting those public rights to a narrower corridor."

Mr Hanratty further advised that:

"the extent of public rights over the track does extend to the full width between hedges as, in the absence of evidence to the contrary, this is probably what people have habitually used."

Mr Hanratty is the Council's Senior Definitive Map Officer and is responsible for maintaining the Definitive Map and Statement, which constitutes the legal record of Public Rights of Way. Whilst he correctly confirmed that the assessment of visibility splays falls within the remit of the Highway Authority, his comments provide relevant evidence regarding the recorded extent of the public rights over the route.

Importantly, despite the Highway Authority raising concerns that delivery of the proposed visibility splays may require a third-party legal agreement, no evidence has been produced during the determination of this application demonstrating that the public rights are confined to a corridor narrower than the existing lane or that the proposed visibility envelope extends beyond land subject to those public rights. Equally, the Highway Authority has not identified any physical obstruction or engineering constraint that would prevent the visibility envelope from being achieved.

This position is reinforced by the accompanying highway engineering evidence prepared by Stantec. The detailed topographical survey, site measurements and cross-sectional analysis demonstrate that the proposed 122.8m northern visibility splay can be achieved without any alteration to the alignment or profile of Queensbridge Lane, the existing ground levels, or the shared private driveway, and therefore without engineering works to adjoining land.

Accordingly, when the highway engineering evidence is read together with the clarification provided by the Council's Senior Definitive Map Officer, there is no evidence before the Local Planning Authority to demonstrate that delivery of the proposed visibility splays is dependent upon engineering works to third-party land or upon the execution of any third-party legal agreement. The Applicant therefore respectfully submits that there is no evidential basis upon which such a requirement can reasonably be imposed.

Highway Betterment

One of the principal benefits of the revised proposal is that it delivers a substantial and permanent improvement to the existing highway environment, extending well beyond the needs of the proposed development itself. Through successive revisions, additional technical work and significant further investment, the scheme has evolved into one that not only mitigates its own impact but leaves the surrounding highway network in a demonstrably better condition than it exists today.

The accompanying Transport Technical Note demonstrates that the proposal will:

- Permanently close the existing substandard agricultural access identified by the Highway Authority and replace it with a purpose-designed access.
- Deliver the full 150 metre visibility splay to the south, following the acquisition of additional land specifically to meet the Highway Authority's request.
- Increase available visibility by approximately 325% to the south and 120% to the north compared with the existing agricultural access.
- Significantly improve visibility for the existing shared private driveway serving six established dwellings, providing a lasting benefit for existing highway users entirely independent of the proposed development.
- Remove the need for agricultural vehicles to undertake awkward manoeuvres onto the A528.
- Demonstrate safe access for refuse, service and emergency vehicles through revised swept-path analysis.
- Provide parking, turning, cycle parking and drainage arrangements that have been accepted by the Highway Authority.
- Secure the long-term management of roadside vegetation, ensuring that the improved visibility achieved by the development is permanently maintained.

Importantly, many of these improvements are not required simply to facilitate seven glamping pods. They represent permanent public benefits that will continue to improve highway safety and the operation of the A528 and Queensbridge Lane for existing residents, visitors and highway users regardless of the proposed development.

Compared with the existing position, the development removes a recognised substandard access, delivers substantial visibility improvements, improves conditions for existing users of Queensbridge Lane, formalises the site access and secures long-term management of the highway interface.

Against this comprehensive package of permanent and measurable highway improvements remains a single residual matter—a 16.2 metre shortfall to the north.

Whilst the accompanying drawings and visibility calculations provide the technical assessment, the following photographs are included to assist the Local Planning Authority in understanding the practical visibility available to drivers approaching Queensbridge Lane. They demonstrate the existing highway environment and provide context to the accompanying visibility assessment contained within the Transport Technical Note.

Existing Visibility at Queensbridge Lane-North



Existing Visibility at Queensbridge Lane-South



Vehicle Visibility – Approach from the North (approximately 45m from Queensbridge Lane access)-NOTE WITH CAR IN ACCESS



Vehicle Visibility – Approach from the South (approximately 75m from the Queensbridge Lane access)- NOTE WITH CAR IN ACCESS



Visibility Standards

The Highway Authority notes that TAN 18 remains the prevailing guidance. However, planning decisions must ultimately consider the proposal as a whole, including whether the development delivers a measurable improvement to the existing highway environment when compared with the current situation.

As explained in Brian Laird's accompanying Transport Technical Note, the revised proposal now delivers the full 150m visibility requirement to the south, with only a limited residual shortfall remaining to the north. In addition, the proposal replaces an existing substandard agricultural access with a purpose-designed access, significantly improves visibility for users of Queensbridge Lane, removes the need for agricultural vehicles to undertake awkward manoeuvres on the public highway and secures the long-term management of roadside vegetation. The applicant respectfully considers that these cumulative improvements should be weighed collectively when assessing the overall acceptability of the proposal.

TAN 18 has remained the prevailing Welsh planning guidance since its publication in March 2007 and was therefore the applicable standard at the time of the Bryn Estyn Road appeal determined on 16 July 2013. Whilst the Design Manual for Roads and Bridges has evolved over time, TAN 18 has remained the relevant planning guidance throughout that period.

The applicant also considers the Bryn Estyn Road appeal to be a relevant comparison. In that case, the proposal sought to replace an existing substandard access with a new shared access serving both an existing dwelling and a proposed dwelling. The Highway Authority considered that visibility splays of 2.4m x 56m were required in both directions. However, the proposal was only capable of achieving visibility splays of approximately 2.4m x 31.7m in one direction and 2.4m x 30.6m in the other, representing a substantial shortfall against the guideline requirements. Despite this, the Inspector concluded that the proposed access would represent a significant improvement over the existing arrangement and that the resulting highway betterment was sufficient to outweigh the identified visibility deficiency. Planning permission was therefore granted.

The Inspector accepted that planning judgement could properly be exercised where a proposal resulted in a significantly safer replacement access despite residual visibility deficiencies.

Whilst every planning application must be determined on its own merits, the applicant respectfully considers that the principle established by the Inspector is directly relevant to the assessment of this application; namely, that where a proposal delivers a clear and measurable improvement to the existing highway environment, a limited residual shortfall against guideline visibility standards does not necessarily render the development unacceptable.

By comparison, the revised proposal now delivers the full 150m visibility requirement to the south, leaving only a limited residual shortfall to the north, whilst also providing a broader package of highway improvements than currently exists. These include the replacement of an existing substandard agricultural access with a purpose-designed access, significant improvements in visibility for existing users of Queensbridge Lane, improved conditions for vehicles using the adjoining highway, and the long-term management of roadside vegetation. The applicant respectfully considers that, when assessed against both the existing site conditions and the approach taken by the Inspector in the Bryn Estyn Road appeal, the revised proposal represents a substantial and measurable improvement to highway safety.

Purchase of Additional Land

The most significant amendment since the previous submission has been the acquisition of additional land immediately south of the proposed access.

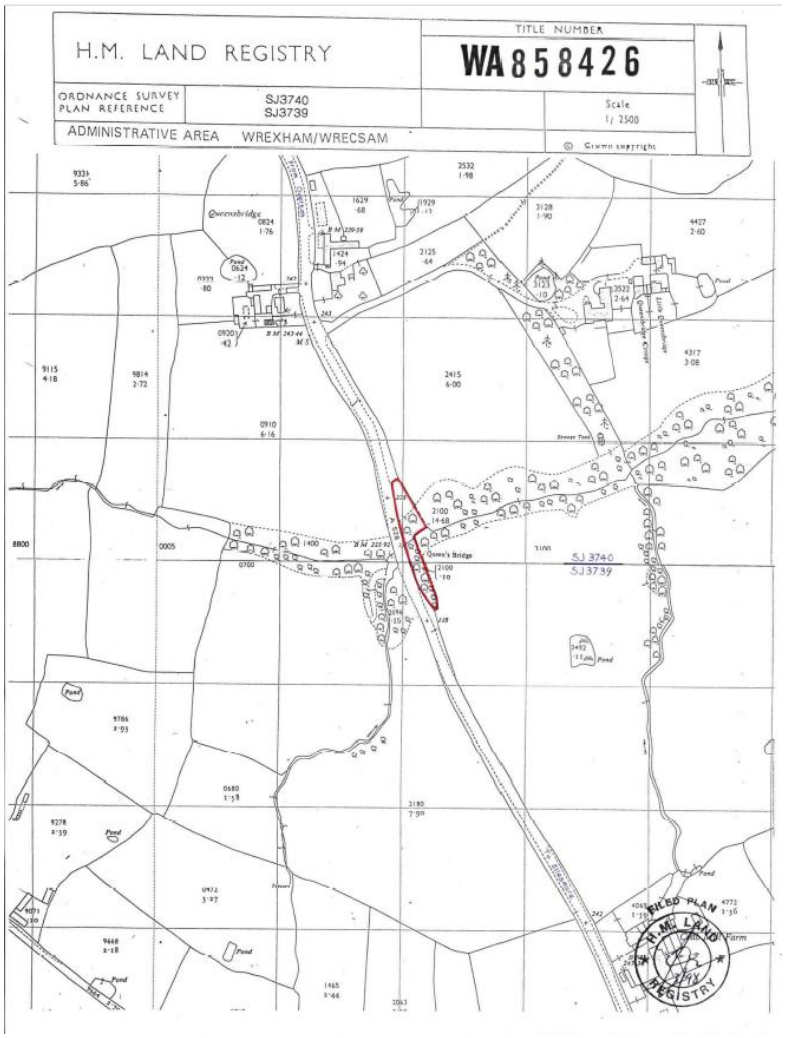
Following further discussions with Stantec it became apparent that ownership of this land would enable the full 150m visibility splay requested by the Highway Authority to be delivered.

Rather than relying solely upon the previous design, the applicant undertook the considerable task of identifying the landowner, negotiating its purchase and bringing the land into the applicant's ownership.

Before proceeding, the additional land was assessed by both our ecological and arboricultural consultants to ensure the required visibility improvements could be delivered without compromising the environmental objectives of the scheme.

The applicant has now acquired the additional land, enabling delivery of the full 150m southern visibility splay requested by the Highway Authority.

This demonstrates the applicant's continued commitment to responding positively to consultation comments and to delivering the highest standard of development reasonably achievable.



Remaining Highway Matters

In addition to the principal visibility matters addressed within the accompanying Transport Technical Note, the remaining highway issues raised throughout the consultation process have now either been resolved or satisfactorily addressed.

Whilst the visibility available from the existing shared private driveway for Queensbridge lane does not itself achieve the standards set out within TAN 18, it is important to recognise that the current application is not seeking planning permission to alter that access. Nevertheless, as a direct consequence of the proposed hedge relocation and new access arrangement, visibility for the six existing properties served by the shared driveway would be significantly improved compared with the existing situation. This represents a clear and material highway safety benefit delivered by the proposal.

The proposal also secures the permanent closure of the existing field access, which the Highway Authority has identified as providing inadequate visibility and which currently represents the most substandard access onto the A528. Replacing this with a purpose-designed access delivering substantially greater visibility represents a clear improvement to the existing highway environment.

The Highway Authority has also confirmed that the anticipated trip generation associated with the proposed development is acceptable given the low traffic flows on the adjoining highway. Furthermore, the revised drawings and accompanying Transport Technical Note now demonstrate that the proposed access and internal layout can safely accommodate refuse and service vehicles, including simultaneous manoeuvring with a large passenger car, without encroachment into the opposing traffic lane. The revised parking provision, including an accessible parking space and covered cycle parking, has similarly been confirmed as acceptable by the Highway Authority, and the Applicant is content to accept the recommended Construction Traffic Management Plan condition.

Taken together, these matters demonstrate that the technical highway issues raised during the course of the application have now been comprehensively addressed. The remaining consideration is therefore confined to the extent of the achievable northern visibility splay, which is examined in detail within Brian Laird's accompanying Transport Technical Note. In the Applicant's respectful submission, when considered alongside the significant highway betterment delivered by the proposal as a whole, the overall scheme represents a clear improvement to the existing highway situation and should be assessed on that basis.

It is respectfully submitted that the accompanying technical evidence has now addressed each of the matters identified within the Highway Authority's consultation response dated 9 July 2026. Those matters relating to parking provision, cycle parking, swept path analysis, refuse vehicle operation, construction traffic management, tree constraints, drainage, access design, land ownership and the proposed closure of the existing field access have either been resolved to the Highway Authority's satisfaction or are capable of being secured by condition. The only remaining matter of professional judgement concerns the extent of the achievable northern visibility splay, which is addressed comprehensively within the accompanying Transport Technical Note.

Planning Balance and Overall Highway Betterment

Throughout the determination of this application the Applicant has sought to work positively with the Local Planning Authority and its consultees, responding constructively to each technical issue as it has been raised. As demonstrated by the accompanying technical evidence, the overwhelming majority of the Highway Authority's comments have now been satisfactorily addressed through revisions to the scheme, additional supporting information and, where necessary, further investment by the Applicant.

In particular, the Applicant has acquired additional land to achieve the full 150m visibility splay to the south, permanently closes the existing substandard field access identified by the Highway Authority, provides a purpose-designed replacement access, significantly improves visibility for the existing shared private driveway serving six established dwellings, demonstrates that no third-party engineering works are required to achieve the proposed visibility envelope, provides revised swept path analysis for larger refuse vehicles, increases parking provision, provides accessible parking and cycle storage, and accepts the recommended Construction Traffic Management Plan condition. The ecological, arboricultural and drainage matters raised during the course of the application have likewise been addressed through updated specialist reports and revised drawings.

Accordingly, the technical issues that remain are now confined to a single matter: the maximum achievable visibility to the north. The accompanying Transport Technical Note demonstrates that the available visibility of 122.8 metres represents the maximum physically achievable in light of the existing vertical alignment of the A528 and is not constrained by the design of the proposed development itself. Whilst this falls 16.2 metres short of the interpolated design distance sought by the Highway Authority, the proposal nevertheless delivers a substantial overall improvement to the existing highway environment when compared with the current situation.

The proposal should therefore be considered in the round. Rather than introducing a new highway hazard, it removes an existing substandard field access, replaces it with a significantly safer purpose-designed access, delivers substantial visibility improvements for existing users of Queensbridge Lane, formalises the site access arrangement and provides a range of additional highway improvements that would not otherwise occur. As explained within the accompanying Transport Technical Note, these wider highway benefits reflect the same planning principles applied by the Inspector in the Bryn Estyn appeal, namely that a proposal may be acceptable where it results in a clear overall improvement to highway safety notwithstanding a limited departure from the preferred visibility standard.

The Applicant respectfully submits that, when assessed against the development plan and national planning policy as a whole, the application is now supported by a comprehensive body of technical evidence demonstrating that the proposal represents a net gain in highway safety and that the remaining residual shortfall should be considered in the context of those substantial and measurable public benefits. The Applicant therefore respectfully invites the Local Planning Authority to conclude that the proposal is acceptable on its planning merits and capable of being approved, subject to appropriate planning conditions.

Overall Position

This application has evolved considerably throughout the determination process and should now be assessed on the basis of the amended plans, updated technical evidence and comprehensive package of mitigation before the Local Planning Authority.

What began as a proposal for rural diversification has, through constructive engagement with consultees, developed into a scheme that delivers wider and lasting public benefits. The Applicant has commissioned additional specialist reports, revised the engineering design, updated the ecological and arboricultural assessments, amended the site layout, accepted appropriate planning conditions and, at considerable expense, acquired additional land solely to achieve the Highway Authority's requested 150m visibility splay to the south. These changes were not made simply to facilitate the development, but to maximise the overall benefit that the proposal can deliver.

As a result, the application now provides a measurable improvement over the existing situation. It replaces a substandard agricultural access with a purpose-designed access, significantly improves visibility for existing highway users, enhances ecological and arboricultural protection, secures long-term landscape management and supports the sustainable diversification of Queensbridge Farm. The technical matters raised throughout the consultation process have now been comprehensively addressed.

The only remaining issue is a 16.2 metre residual shortfall to the north. The accompanying Transport Technical Note demonstrates that this represents the maximum physically achievable visibility and is a matter of planning judgement rather than an unresolved technical deficiency. Against that limited residual shortfall stands a comprehensive package of measurable highway, environmental and landscape improvements that would not occur if the proposal were refused.

The Applicant respectfully submits that the planning balance is now clear. The proposal delivers a substantial overall betterment to the existing situation, addresses the concerns raised throughout the consultation process and represents the highest standard of development reasonably achievable within the site's physical constraints. It is therefore respectfully considered that the application is capable of being supported and approved, subject to appropriate planning conditions.

The proposal now before the Local Planning Authority is materially different from the scheme originally submitted and should therefore be determined on the basis of the revised plans and updated technical evidence rather than earlier consultation responses directed at superseded iterations of the proposal.

Thank you once again for the time taken to consider this application. We look forward to continuing to work positively with the Local Planning Authority as the application progresses.

Yours sincerely,

Steven Heighway
Applicant