MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO:	
Our Ref:	ET/DC/DB/P/2026/0365	**Your Ref:**	P/2026/0365
Date:	14/08/2026		

TOWN AND COUNTRY PLANNING ACT 1990

PROPOSAL: NEWID DEFNYDD TIR I SAFLE SIPSIWN A THEITHWYR TEULUOL Â 2 LLAIN / CHANGE OF USE OF LAND TO A 2 PITCH FAMILY GYPSY AND TRAVELLER SITE
LOCATION: LAND AT BRANDIE, BRANDY, RUABON, WREXHAM, LL14 6RB

I refer to your consultation / email dated 23/06/2026 in respect of the above.

The Local Highway Authority (LHA) has reviewed the submitted information and provides the following comments.

Site Context
The existing access is understood to serve seven residential dwellings and an established nursing home comprising approximately 26 bedrooms. The nursing home is accessed near to the site entrance on a straight section of the unadopted road, with parking bays to the left.
The current application seeks planning permission for the provision of two Gypsy and Traveller pitches, including the erection of two day rooms and the siting of two touring caravans on areas of permeable paving, as illustrated on the submitted site layout plan.
The site is accessed via an unadopted lane which connects to Stryt Las, an adopted classified highway currently subject to a 20mph speed limit.

Existing Access Lane
The access lane serving the site is unadopted and therefore falls outside the direct control and maintenance responsibilities of the Local Highway Authority. Notwithstanding this, the LHA offers the following observations for the Local Planning Authority's consideration in determining the application:

- The lane is of limited width (2.4m only in some locations), contains restricted forward visibility at various locations and offers few opportunities for opposing vehicles to pass. The LHA has concerns regarding the suitability of the lane beyond the nursing home access to accommodate additional traffic associated with the proposed development, particularly given the existing level of use. Just referring to 2nr new dwellings compared with 7nr total existing (of unknown occupancy levels), this may be as much as between 20% and 25% increase in trip generation along the lane beyond the nursing home access, where there are bends with poor visibility. This approximate measurement assumes there are slightly less occupancy rates than the existing properties. This is considered a significant increase in numbers. The

access lane near the entrance, from where the nursing home access is located is straight and apart from the surface condition is considered adequate in layout.

- The proposed access from the application site onto the lane appears to provide limited visibility to the right for vehicles exiting the site, circa 2.0m x 9m measured to the centre of the track.
- The submitted red-line boundary indicates that vegetation affecting visibility may lie outside the applicant's ownership or control. The applicant should therefore advise what visibility splay can be assured and maintained. The LHA would recommend that a splay in accordance with vehicles not exceeding 15mph should be provided.
- The lane also functions as a public footpath route (nr16). The introduction of additional vehicular movements, including those associated with touring caravans, gives rise to concerns regarding the potential for increased conflict between pedestrians and vehicles. Whilst this arrangement is understood to be an existing circumstance, the LHA has concerns regarding any material intensification of use.
- Whilst it is recognised that the lane is used by 7 other dwellings, this is an existing situation and the LHA's advice is offered considering the ability of this lane to safely accommodate additional traffic, including vehicular, cycling and pedestrian.
- **It is the LHA's recommendation that the LPA consult directly with the emergency services to seek advice on the suitability of the lane to accommodate emergency services vehicles, particularly fire engines and ambulances**. Emergency Service vehicle access is one of the criteria set out in Welsh Guidance on Designing for Gypsy and Traveller Sites which quite clearly sets out minimum dimensions for emergency vehicles of 3.7m clearance. See extract below:

Extract from Welsh Government Guidance on Designing for Gypsy and Traveller Sites:

"3.24 Good quality roads which are capable of withstanding heavy vehicles should be constructed. Normally concrete or tar macadam on a suitable sub-base appropriate to soil conditions is preferable. Roads should be wide enough to allow mobile homes access on low loader vehicles and yet not encourage on road parking. Roads should be a minimum of 5.5 metres wide and accommodate vehicles towing caravans up to 10 metres long.

3.25 The design of roads leading to and through residential sites must allow easy access for emergency vehicles. Mobile homes must not be more than 50 metres from a road (including internal site roadways). Roads should not have overhead cables less than 4.5 metres above the ground. Vehicular access and gateways must be at least 3.1 metres wide and have a minimum clearance of 3.7 metres"

It is the opinion of the Local Highway Authority that the existing lane is deemed inadequate to accommodate any additional trip generation, however it is accepted that the lane is unadopted and therefore the Highway Authority concern is a practical observation for the LPA to determine

If the LPA deem the lane acceptable, then the LHA would require the following to assess other matters, as follows:

Site Access
The applicant should provide a dimensioned and scalable drawing of the site access that demonstrates:

1. That visibility splays of 2.4 metres x 25 metres can be achieved and maintained in both directions, measured to the nearside edge of the carriageway, commensurate with the prevailing speed limit of 20mph.

2. that the access arrangements are capable of accommodating the anticipated vehicle movements associated with the development. This should include swept path analysis for the largest vehicle likely to access the site, including service and delivery vehicles, demonstrating that two vehicles can safely pass one another without conflict in opposing directions.

Refuse Collection
The applicant should provide details of the proposed refuse collection arrangements for the development.
This should include confirmation of whether waste collection will be undertaken by WCBC Waste Services or by a private operator. Where collection vehicles are proposed to access the site via the existing lane, the applicant should demonstrate that suitable access and turning arrangements can be provided for the vehicle concerned.

Parking
The proposed plan includes adequate space for parking and turning within the site.

Crashmap:
Crashmap reveals no recorded incidents at the site entrance in the last 5 years

Active Travel
The site is located in a sustainable village location with good bus connectivity available on Stryt Las. Access to retail, and schools is within walking distance. However, in winter months the lane itself may be considered inadequate without illumination.

Should the LPA support the proposal the LHA would seek improvements to the lane, access surfacing and clarity on the detailing of the site access off the lane with regards to surface materials, and drainage proposals. Some provision for lighting to safeguard pedestrian traffic, particularly for children would be considered beneficial in demonstrating the proposal is sustainable.

The applicant should add cycle parking provision in accordance with LPG16 to the proposed plan.

Conclusion

Based on the information currently submitted, the LHA has concerns regarding the suitability of the access arrangements and the ability of the existing lane to safely accommodate the additional traffic & pedestrian traffic associated with the proposed development. An additional 2 dwellings compared with the 7 existing dwellings for the lane beyond the nursing home access represents a significant increase. Welsh Government guidance on such facilities requires access for emergency vehicles and for deliveries that isn't available.

The LHA are unable to support this proposal as submitted albeit an unadopted road or lane. So the LHA would recommend the opinion of the emergency services should be sought.

Should the LHA seek to support the proposal, further information and improvements are therefore required in relation to updating plans highlighting visibility, vehicle tracking, access geometry and waste collection arrangements before the LHA is able to complete its assessment and provide a fully informed recommendation to the Local Planning Authority.

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 / 171 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.