MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO:	Sarah Duckworth
Our Ref:	ET/DC/DB/P/2026/0226 Response 2	**Your Ref:**	P/2026/0226
Date:	21/08/2026		

Town and Country Planning Act 1990

PROPOSAL: NEWID DEFNYDD Y CYNHWYSYDD PRESENNOL I DDOSBARTH A3 (BWYD A DIOD - CIOSG LLUNIAETH) / CHANGE OF USE OF EXISTING CONTAINER TO CLASS A3 (FOOD AND DRINK - REFRESHMENT KIOSK)

LOCATION: BRADLEY MILL BARN, BRADLEY, WREXHAM, LL11 4DD

INTRODUCTION
I refer to your consultation / email dated 11 May 2026 in respect of the above and subsequent mailed response.
The applicant has submitted for approval of a café utilising an adapted storage container, with outdoor seating

1. RECOMMENDATION
Following a site inspection on 19 August 2026, during which the café was observed operating, the Local Highway Authority (LHA) has concerns regarding customer parking, delivery arrangements and pedestrian access.
Vehicles were observed parking on the adjacent lane, confirming concerns that the development generates vehicular trips without adequate off-street parking provision. The proposal also fails to demonstrate suitable servicing arrangements, with no evidence that delivery vehicles can enter and leave the site in a forward gear.
The LHA further notes that the recently constructed pedestrian access provides limited intervisibility between pedestrians and approaching traffic and does not incorporate suitable access arrangements for wheelchair or pushchair users.

Accordingly, the LHA is unable to support the application as submitted.

Should the applicant address the issue of roadside parking, the LHA would require revised proposals demonstrating:

- Adequate off-street parking provision;
- A turning facility enabling delivery vehicles to enter and leave the site in a forward gear;
- Secure cycle parking within the site;
- Improvements to pedestrian visibility and accessibility at the site entrance.
- An agreed cap on customers, commensurate with a “small scale coffee and light refreshments kiosk”

Should the Local Planning Authority be minded to grant consent, the LHA recommends that any approval be temporary for a period of 12 months and subject to conditions controlling parking, servicing arrangements, pedestrian access improvements and operating hours.

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2. SITE OBSERVATIONS & HIGHWAY CONTEXT

A site inspection was undertaken by the LHA Development Control Engineer on 19 August 2026. The café was operational with approximately 20 customers present.
The following observations were made:

- The site provides approximately 48 customer seats via five 8-person tables and additional loose seating.
- Two/three cars and one motorcycle were observed parked on or adjacent to the public highway outside the site.
- No usable off-street parking was available at the time of inspection, with the gated area fenced off.
- The observations indicate that the development attracts vehicular trips despite being promoted as primarily serving walkers and cyclists.
- The adjacent lane is narrow and incapable of accommodating on-street parking without prejudicing the safe passage of other users.
- The full carriageway width should remain unobstructed to maintain access to existing properties and the Horse Sanctuary opposite, which requires access by larger vehicles.
- The pedestrian entrance provides limited visibility of approaching traffic from the Bradley direction and lacks a dropped kerbline suitable for wheelchair and pushchair users.
- The entrance pillars appear to encroach onto adopted highway verge and should be reviewed.

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3. DETAILED TECHNICAL ASSESSMENT

3.1 Staffing and Trip Generation

The business is operated by a single member of staff residing on site. Whilst staff-generated trips are negligible, the development continues to generate customer vehicle movements for which no satisfactory parking provision has been demonstrated.

3.2 Vehicular Access

The existing access is residential in character.
The following visibility splays were recorded from a 2.4m setback:

- Northbound towards Llay: 2.4m x 35m
- Southbound towards Alyn Bridge: 2.4m x 42m

Subject to low vehicle speeds typically associated with an unclassified rural lane, these visibility standards are considered acceptable. A minimum visibility splay of 2.4m x 25m should be maintained in both directions, free from obstruction exceeding 1.05m in height.

3.3 Pedestrian Access

The separate pedestrian access is currently unsatisfactory. Visibility for pedestrians exiting onto the public highway is restricted and the entrance does not provide suitable access for wheelchair or pushchair users.
The entrance pillars appear to be located within adopted highway verge. Unless previously approved under separate consent, these features should be removed or repositioned to facilitate improved pedestrian visibility and accessibility.

3.4 Operating Hours

The proposed operating hours of 10:00 to 16:00 avoids peak commuter periods. The LHA recommends a minor additional comment restricting operation to daylight hours as it may be dark by 16:00 in winter months in this shaded valley location and unlit lane.

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4. SUMMARY AND CONCLUSION

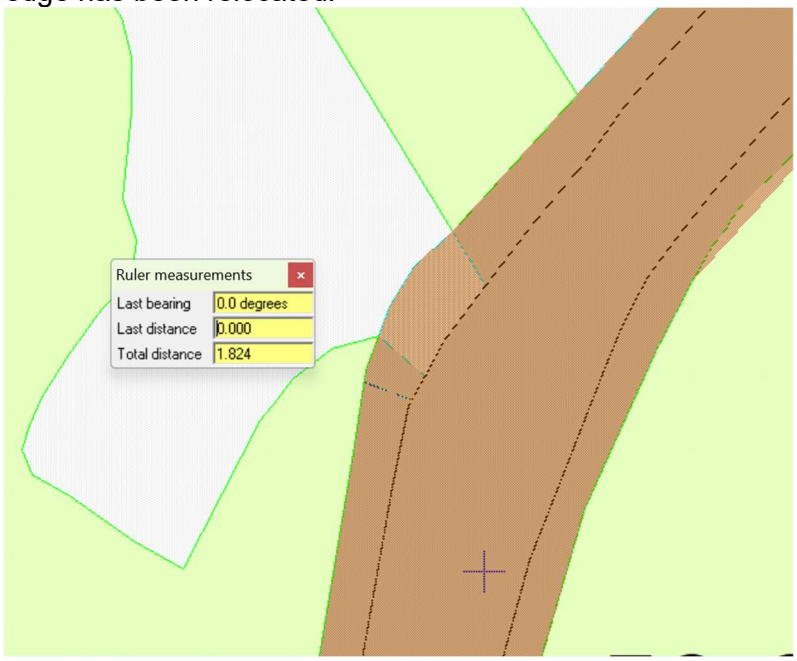
The LHA is unable to support the proposal in its current form for the following reasons:

- Customer vehicles were observed parking on the public highway, creating potential obstruction and road safety concerns.
- No satisfactory off-street parking provision has been demonstrated (other than a comment noting offroad parking was available).

- The proposal lacks suitable servicing arrangements and does not demonstrate that delivery vehicles can enter and leave the site in a forward gear.
- The scale of outdoor seating (approximately 48 seats) raises concerns regarding the intensity of use relative to the site's highway constraints.
- The pedestrian access provides inadequate visibility and accessibility.
- The entrance pillars appear to encroach onto adopted highway land.(See Fig 1 below)
- No effective mitigation has been proposed to prevent roadside parking.

Whilst the LHA acknowledges the benefit of a refreshment facility serving walkers and cyclists, the proposal must be assessed on its highway impacts.
The site inspection confirmed that customer parking is occurring on the adjacent lane. This raises concerns regarding highway safety, potential obstruction of neighbouring accesses and restrictions to larger vehicles accessing the Horse Sanctuary opposite.
Furthermore, no details have been provided demonstrating available off-street parking, delivery arrangements, vehicle turning facilities or measures to prevent highway parking.
For these reasons, the LHA considers that insufficient information has been provided to demonstrate that the proposal would not result in an unacceptable impact on highway safety or the free flow of traffic.
Accordingly, the application is not supported.

Fig 1: LHA records: Adopted verge shown in brown behind the dotted line of the kerb or road edge. This suggests a greater set back from the kerbline than that constructed, unless the kerbline/road edge has been relocated.



KWEdwards

Contracts & Engineering Manager
On behalf of Chief Officer, Environment & Technical

Supplementary Notes

The applicant's attention should be drawn to item nos. 1, 2, 3, 4 & 5 of the supplementary notes.

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.