23/09/2026

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 further to the Highway Authority consultation response dated 6 August 2026 and the Natural Resources Wales consultation response dated 5 August 2026. This submission provides the latest coordinated plans and technical evidence following a further detailed review by the project team.

As with our previous submission, we would like to thank the Council and consultees for the time taken to review the application. The purpose of this submission is not to revisit matters that have already been accepted, but to respond directly to the remaining questions raised - particularly the Highway Authority's comments regarding the northern visibility splay, access geometry, vertical visibility, vehicle movements and deliverability of the revised access.

The most important change is that the access has now been repositioned. The revised arrangement provides the full visibility distances requested by the Highway Authority following the speed surveys: 2.4m x 139m to the north and 2.4m x 150m to the south. The revised design also incorporates the required 600mm vertical visibility envelope. Accordingly, the previous 122.8m northern visibility position and the associated 16.2m shortfall no longer form part of the proposal now before the Council.

Summary of Amendments

The principal documents and amendments submitted with this response are summarised below:

- Stantec Transport Technical Note 004 (September 2026)- specifically responding to the Highway Authority memorandum dated 6 August 2026.
- Stantec Site Access Visibility Splay showing 2.4m x 150m visibility to the south and 2.4m x 139m visibility to the north, including the vertical visibility assessment.
- Queensbridge Farm Overton Highway Statement (September 2026), -secondary highway consultant commentary.
- Updated Proposed Site Layout Plan by Matt Wood Architect, coordinating the repositioned access, parking, turning, cycle provision, and site layout.
- Updated Landscape Masterplan, amended to reflect the revised access and car park arrangement.
- Updated Arboricultural Impact Assessment, Arboricultural Method Statement and Tree Protection Plan by Arbtech (September 2026), reflecting the revised access and the no-dig/root-protection construction strategy.
- Updated Access Surface & Root Protection Strategy, coordinating the first 10m hard-bound permeable surface, Cellweb TRP construction, retained oak, roadside drainage depression and proposed 600mm culvert.
- Updated Ecological Impact Assessment (Rev 4) and Green Infrastructure Statement (v3) by Collington Winter Environmental, reflecting the current scheme and associated landscape/vegetation changes.

Highway Authority

Following receipt of the Highway Authority's memorandum dated 6 August 2026, we again instructed Brian Laird and the Stantec transport team to review every outstanding point. The highways note has been prepared expressly for that purpose and should be read as the principal technical highways response accompanying this cover statement.

The Highway Authority's August response identified the northern visibility splay as the principal unresolved issue. It recorded the speed-survey-derived requirements of 2.4m x 139m to the north and 2.4m x 150m to the south, while the then-current P03 drawing provided only 122.8m to the north. It also questioned the vertical visibility envelope and whether the splay could be delivered without reliance upon the shared private driveway or third-party works.

Rather than continuing to seek acceptance of the previous shortfall, the access position has been reconsidered. The revised access now provides the full distances requested by the Highway Authority. This is a material change from the scheme considered in the 6 August consultation response. In order to confirm that the splay is deliverable, the site has also been investigated in detail and cast-iron boundary markers have been identified at the corner of Queensbridge Lane. The revised splay has subsequently been designed by reference to those identified boundary features so that its delivery does not require physical alteration of third-party land.

Visibility Splays - Full Highway Authority Distances Now Achieved

Stantec drawing 332613092/100/005 P04 demonstrates a visibility splay of 2.4m x 150m to the south and 2.4m x 139m to the north. These are the precise distances identified by the Highway Authority from the recorded 85th percentile speeds of 50.8mph northbound and 48.3mph southbound. The required 600mm vertical visibility envelope has also been verified against the detailed topographical survey, ensuring that the assessment is based upon measured site levels rather than assumption. The additional investigation of the physical boundary markers provides further evidence regarding the position and deliverability of the proposed splay.

The revised proposal therefore directly addresses the principal outstanding highway matter identified in the Highway Authority's previous response. There is no longer a request for the Council to exercise planning judgement over a 122.8m northern splay or a departure from the Highway Authority's requested distance.

Vertical Visibility and Access Gradient

The Highway Authority also questioned whether the required vertical visibility envelope could be achieved without alterations to the shared private driveway or surrounding ground levels. The revised Stantec drawing assesses the visibility envelope using the 600mm object height previously discussed during consultation.

In addition, drawing 332613092/100/008 P01 provides a dedicated long section through the revised access. The access rises at 5% away from the carriageway edge. Stantec's Technical Note explains that this gradient accords with the 5% ideal longitudinal gradient identified in Manual for Streets and remains below the 6% desirable maximum gradient identified for an all-purpose single carriageway in DMRB CD 109.

The revised highway geometry therefore answers the earlier concern by demonstrating the access in plan and section, rather than relying solely upon a two-dimensional visibility line.

Location of the Northern Splay / Third-Party Land

The Highway Authority's previous response was based upon the former access position, where the achievable northern visibility splay was 122.8m. Concern was raised because that sightline crossed Queensbridge Lane, an existing privately owned shared access which is also Overton Footpath 34, a Public Right of Way (PROW). The Highway Authority therefore questioned whether a legal agreement might be necessary where delivery or maintenance of the visibility splay depended upon land or works outside the Applicant's control.

It is important to distinguish between the ownership of Queensbridge Lane, the public rights that exist over it, and ownership of its boundary hedges.

The Applicant has never suggested that the PROW status of Queensbridge Lane means that the underlying land is not privately owned. The Applicant recognises that the lane is privately owned, with a number of adjoining properties benefiting from private access rights over it. However, private ownership coexists with the established public highway rights and does not remove the Council's statutory responsibilities and powers in respect of the PROW.

Wrexham County Borough Council's own Public Rights of Way Maintenance and Enforcement Policy confirms that, under section 130 of the Highways Act 1980, the Council has a statutory duty to assert and protect the public's use and enjoyment of Public Rights of Way and, so far as possible, prevent their unauthorised stopping-up or obstruction. The same policy states that the surface of most Public Rights of Way is vested in the County Council as Highway Authority, with the landowner's interest extending to the subsoil. It further confirms that enforcement action may be taken where the surface of a PROW is unlawfully disturbed or damaged.

This is relevant to the consideration of the visibility splay because private ownership does not provide an unrestricted ability to materially resurface, raise the level of or otherwise alter the established PROW in a manner affecting its lawful use. Any such works would need to be undertaken with the necessary lawful authority. The deliverability assessment should therefore not proceed on an assumption that the level or surface of the established PROW could simply be altered at will by the underlying landowner in order to interfere with an approved visibility envelope.

The width of the PROW is also relevant. It has previously been confirmed that Overton Footpath 34 has no recorded definitive width. Wrexham's own policy expressly states that, where no width is recorded, there is no general rule as to the width of a Public Right of Way; rather, it is a matter of fact to be determined from the available evidence. That evidence can include historical documentation, the width customarily enjoyed by the public and, importantly, "the width of the way between boundaries such as hedges or fences."

The important distinction in the previous design was therefore between the lane itself and its boundary hedges. Wrexham's policy confirms that boundary hedgerows and trees alongside a PROW remain the responsibility of the relevant landowner or occupier. The northern hedge adjoining Queensbridge Farm was established as being within the Applicant's ownership and control. However, it had been suggested that the southern hedge, on the opposite side of Queensbridge Lane, might be wholly or partly within third-party ownership or control.

Under the previous access arrangement, the issue was therefore not simply that the visibility splay crossed the privately owned lane/PROW. To physically establish that previous visibility envelope, approximately 3m of the southern boundary hedge would also have required removal. If that hedge was within third-party ownership or control, the Applicant could not guarantee those works without first securing the necessary agreement. It was this requirement for physical works to potentially third-party vegetation—not merely the passage of a sightline across the PROW—that created the legitimate question regarding deliverability.

Accordingly, the ultimate ownership of the southern hedge is no longer material to the deliverability of the revised access, because the visibility envelope does not require that hedge to be removed or altered.

The revised access arrangement removes that dependency.

The proposed access has now been repositioned and the northern visibility splay redesigned. Stantec's latest highway evidence demonstrates the full 2.4m x 139m northern visibility splay, together with the 2.4m x 150m southern splay, requested by the Highway Authority following the speed surveys.

Crucially, the revised northern splay requires no removal whatsoever of the southern boundary hedge to Queensbridge Lane. The sightline now passes to the right of and clear of that boundary (marked by a cast-iron heritage boundary post), rather than passing through the southern hedge as occurred with the previous arrangement.

Consequently, the revised proposal does not require the Applicant to remove, cut back or manage the southern hedge. It does not depend upon establishing ownership of that hedge in the Applicant's favour, nor does delivery of the visibility splay require physical engineering works or alteration of land under third-party control. The previous requirement to remove approximately 3m of potentially third-party hedge has therefore been designed out of the scheme entirely.

This is an important change when considering the Highway Authority's previous concern. Regardless of the ultimate ownership position of the southern hedge, its removal is no longer necessary to deliver or maintain the required visibility. The revised sightline passes clear of the boundary and no third-party land or vegetation needs to be physically altered to establish the splay.

Accordingly, the potential third-party deliverability issue associated with the former access position no longer arises under the current proposal. The latest design achieves the Highway Authority's requested 139m northern visibility distance without removal of the southern Queensbridge Lane hedge and without physical alteration of third-party land. The current proposal should therefore be assessed against the geometry and deliverability demonstrated on the latest Stantec drawings, rather than against the third-party constraints associated with the now-superseded access arrangement.

Third-Party Deliverability Conclusion

The revised 139m northern visibility splay passes clear of the southern boundary of Queensbridge Lane, identified on site by the cast-iron heritage boundary post. No removal, cutting-back or management of the southern hedge is required and no physical alteration of third-party land is necessary to establish the revised visibility splay. The third-party dependency associated with the previous access arrangement has therefore been designed out of the proposal.

Forward Visibility

The Highway Authority's response also referred to forward visibility for vehicles approaching the access and for vehicles waiting to turn right. The revised highway assessment confirms that forward visibility for, and of, right-turning vehicles is consistent with the relevant Welsh Government guidance. This matter is therefore addressed within the updated highway package.

Access Width, Radii and Simultaneous Vehicle Movement

The Highway Authority requested an access capable of accommodating cars and delivery/refuse vehicles simultaneously and previously accepted the principle demonstrated by the swept-path analysis.

The latest swept-path analysis has been updated for the revised access. Drawing 332613092/100/007 P05 demonstrates simultaneous movement of an 11.347m refuse vehicle and a 5.079m car without conflict and without encroachment into the opposing side of the A528. It also demonstrates that the refuse vehicle can manoeuvre within the site and enter and leave in forward gear.

The access remains 5.5m wide with the required junction geometry and has been coordinated with the revised site layout.

Hard-Bound Surface, Gates and Highway Drainage

The Highway Authority requested a hard-bound surface for a minimum of 10m behind the adjoining highway, no gates across the access and appropriate interception of surface water where required.

The revised coordinated design responds directly to those requirements. The first 10m is proposed as a hard-bound permeable TTE block-infill surface over a Cellweb TRP cellular-confinement structure. No gates are proposed across the vehicular access. An ACO drain or similar interception feature is identified where necessary to prevent surface water discharging onto the highway.

The access also crosses the existing roadside drainage depression. The arboricultural/access strategy incorporates a proposed 600mm culvert through this feature, subject to the normal detailed setting-out, pipe-cover and consent requirements prior to construction. The construction principle has therefore been coordinated with both the highway geometry and the tree-protection strategy. Any separate highway consent required under sections 171 and/or 184 of the Highways Act 1980 will be obtained prior to commencement of the relevant works.

Trip Generation

The Highway Authority queried the TRICS dataset previously used for the seven-unit glamping proposal. Stantec has therefore reviewed and updated the TRICS assessment in Technical Note 004.

The updated assessment concludes that the development would generate only four two-way vehicle movements between 07:00 and 22:00, with a maximum of two two-way movements in any one hour. Stantec therefore concludes that the seven-unit proposal would generate a low level of vehicle movements. This conclusion is consistent with the Highway Authority's previous acknowledgement that the forecast trip generation was acceptable in the context of the low daily development flows.

Parking, Turning and Cycle Provision

The Highway Authority previously confirmed that the revised provision of 12 parking spaces, including a mobility-standard space, was acceptable, and that seven cycle stands with a shelter were acceptable. Those provisions are retained within the coordinated revised layout.

The internal turning area continues to accommodate the refuse vehicle used in the swept-path assessment, allowing servicing vehicles to enter and leave the site in forward gear.

Construction Traffic and Servicing

The Applicant remains content to accept the Highway Authority's recommended Construction Traffic Management Plan condition. If the Local Planning Authority considers it necessary, the Applicant would also accept a suitably worded Service Delivery Management Plan condition controlling servicing arrangements and vehicle size.

Arboriculture and Access Deliverability

Because the access has moved, the arboricultural documents have been updated so that the highway solution and tree-protection solution are assessed together.

The revised Arbtech package identifies the retained oak adjacent to the access and adopts a no-dig construction principle within its Root Protection Area. Existing ground is retained and the required access levels are achieved by building upwards using cellular confinement, subject to arboricultural supervision and final detailed verification.

The first 10m combines the Highway Authority's hard-bound requirement with the arboricultural requirement for a permeable, root-sensitive construction. Beyond this, the access continues using TTE gravel infill / Cellweb TRP before transitioning into the car park construction.

The updated Arboricultural Method Statement, Arboricultural Impact Assessment and Tree Protection Plan therefore demonstrate that the revised highway access is not simply geometrically achievable, but has also been considered in terms of its practical construction beside the retained trees.

Landscape and Green Infrastructure

The Landscape Masterplan has been updated to reflect the revised access and car park arrangement. The wider landscape strategy remains based upon retention of the existing woodland, native planting, species-rich grassland, scrub, hedgerow creation and low-level wildlife-sensitive lighting.

The updated Green Infrastructure Statement acknowledges the vegetation removal necessary to establish the visibility splays and provides compensatory habitat creation through the wider landscape scheme. It concludes that the post-development scheme provides a substantial increase in higher-distinctiveness habitats and recommends a Habitat Management and Monitoring Plan and Construction Environmental Management Plan to secure long-term delivery and protection of the adjoining habitats.

Natural Resources Wales

NRW's consultation response dated 5 August 2026 confirms that its concerns can be overcome through a protected-species/lighting condition, together with inclusion of the relevant drainage documents within the approved plans and documents condition.

NRW specifically notes that the two drainage mounds have been registered as exemptions and that the Third Addendum confirms hot-tub wastewater will be managed through a fully independent sealed containment system, entirely separate from the approved foul drainage infrastructure.

The Applicant is content for the lighting strategy to be secured by condition in the terms requested by NRW, including compliance with Institution of Lighting Professionals / Bat Conservation Trust Guidance Note 08/23. The updated ecological package and landscape proposals should be read alongside NRW's response.

The foul drainage and sealed containment arrangements previously submitted remain part of the proposal. Any further environmental permitting or exemption requirements will be addressed separately from the planning permission in accordance with NRW's advice.

Development Plan Compliance and Material Planning Considerations.

The final amended proposal has been developed with careful regard to the relevant provisions of the Wrexham Unitary Development Plan (UDP) and the principal planning considerations applicable to rural tourism development.

Paragraph 9.9 of the UDP recognises the contribution that good-quality overnight visitor accommodation can make to local employment, local suppliers and rural economic diversification. It identifies the conversion of non-residential rural buildings as one means of providing such accommodation; however, it does not establish conversion of an existing building as a prerequisite for all forms of rural tourism development.

This becomes particularly clear when paragraph 9.9 is read alongside paragraph 9.10 and the subsequent policy relating to touring caravan and camping sites. Paragraph 9.10 separately recognises that holiday, touring caravan and camping sites form an important part of the self-catering tourism sector, can make a useful contribution to the rural economy and may generate demand for additional sites. The UDP therefore expressly contemplates forms of countryside tourism accommodation other than the conversion of existing rural buildings.

The relevant planning assessment is consequently whether the particular form, scale and location of the development are acceptable having regard to the environmental and amenity considerations identified within the development plan. The final proposal has been specifically developed around those considerations.

The scheme is deliberately limited to seven glamping units. Importantly, the units have been removed from the woodland and repositioned within the existing modified grassland field, maintaining a minimum 15m buffer from the woodland edge. The updated Ecological Impact Assessment records that this change dramatically reduces the potential ecological effects of the development and means there will be no loss of irreplaceable ancient woodland habitat.

The development is also accompanied by a comprehensive landscape and green infrastructure strategy incorporating substantial new native planting, screening, species-rich grassland, scrub and hedgerow creation. The ecological assessment identifies beneficial residual effects arising from the creation of this more diverse habitat mosaic, while the lighting strategy has been specifically designed to minimise effects upon bats and other nocturnal species.

Drainage and water-environment matters have similarly been addressed through specialist evidence. The foul drainage mounds have been registered with NRW and hot-tub wastewater is proposed to be dealt with through a fully independent sealed containment system, separate from the foul drainage infrastructure. NRW's latest consultation response confirms that its remaining concerns can be overcome through the identified protected-species condition and inclusion of the relevant drainage documents within any permission.

Highway safety has been the subject of particularly substantial redesign. The access arrangement assessed during earlier stages of the application has now been superseded. The access has been repositioned and Stantec Technical Note 004 demonstrates visibility splays of 2.4m x 139m to the north and 2.4m x 150m to the south, being the distances specifically requested by the Highway Authority following the speed surveys. The final highway package additionally addresses vertical visibility, access gradient, simultaneous vehicle movements, turning, servicing, parking, cycle provision, highway drainage and the physical deliverability of the access.

The final scheme should therefore be considered as a coordinated rural tourism proposal rather than simply by reference to whether an existing agricultural building is being converted. Conversion of rural buildings represents one route to providing visitor accommodation identified within the UDP; it is not presented within the tourism chapter as the exclusive means by which rural tourism accommodation can be acceptable. The UDP separately recognises the role of appropriately located holiday and camping accommodation within the rural economy.

Taken as a whole, the final proposal represents a small-scale rural tourism and diversification scheme whose design has been progressively refined in response to the principal planning considerations relevant to its location. The current submission combines a low-density seven-unit development with comprehensive landscaping and ecological enhancement, protection of the adjoining woodland, controlled drainage and wastewater arrangements, wildlife-sensitive lighting, detailed arboricultural protection and a redesigned highway access meeting the visibility distances requested by the Highway Authority.

Overall Position

This application has undergone substantial and evidenced refinement in response to the matters identified through consultation. Most significantly, the access has now been repositioned to achieve the Highway Authority's requested 2.4m x 139m northern and 2.4m x 150m southern visibility splays, with the 600mm vertical visibility envelope and 5% access gradient demonstrated through the latest Stantec drawings.

The revised northern splay no longer requires removal of the southern Queensbridge Lane hedge or physical alteration of third-party land. The previous 122.8m visibility shortfall and associated third-party hedge dependency therefore no longer form part of the proposal.

The highway solution has also been coordinated with the arboricultural, landscape, ecological and drainage strategies. NRW's remaining requirements are capable of being secured by condition, while the updated technical package demonstrates the practical construction and operation of the revised access.

The proposal should therefore now be assessed as the final coordinated seven-unit scheme shown within the September 2026 submission, rather than by reference to superseded access arrangements or earlier iterations of the development.

We respectfully request that the application is re-consulted upon and determined on that basis.

Yours sincerely,

Steven Heighway

Applicant