MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO::	Jenni Perkins
Our Ref:	ET/DC/MZ/P/2024/1554	**Your Ref:**	P/2024/1554
Date:	18/03/2025		

TOWN AND COUNTRY PLANNING ACT 1990

PROPOSAL: CYFLEUSTER DIDOLI DEUNYDD AILGYLCHU METEL ARFAETHEDIG, GWAREDU TOMEN O BRIDD, ESTYNIAD I IARD GONCRID, TIRLUNIO A GWAITH CYSYLLTIEDIG MEWN EIDDO BUSNES PRESENNOL / PROPOSED METAL RECYCLING SORTING FACILITY, SOIL HEAP REMOVAL, CONCRETE YARD EXTENSION, LANDSCAPING AND ASSOCIATED WORKS AT EXISTING BUSINESS PREMISES

LOCATION: HYDRO ALUMINIUM DEESIDE LTD, BRIDGE ROAD, WREXHAM INDUSTRIAL ESTATE, WREXHAM, LL13 9PS

I refer to your consultation / email dated 24/10/2024 in respect of the above.

It is the LHA's understanding that the proposals are for a metal recycling sorting facility with soil heap removal, a concrete yard extension, landscaping and associated works at the existing business premises at Bridge Road. There is an existing use on the site with approximately 100 staff and two existing access points which are proposed to be retained as part of the proposals.

The application form provided states that there are no proposed amendments to the access arrangements, no new public roads, no new Public Rights of Way and no amendments to existing PROW.

The proposals are for a B2 building with approximately 2876 sq m of floorspace which will house 12 no additional staff members. The proposed building will contain an aluminum sorting line using state of the art recycling technology in a 3 stage process, cleaning and sorting aluminium by particle size, filtering out none aluminium pieces such as plastics, steel and other heavy metals and third, sorting the aluminium grades into group.

As part of the works the applicant is looking to relocate the weigh bridge, to create overflow storage, to extend the level of HGV parking, to provide a container loading location, the provision of a yard office, a finished goods storage area, a proposed recycling materials sorting facilities, external material storage, proposed raw material storage in covered bays and a route through the existing site for HGV's.

Trip Generation

The submitted Transportation Statement indicates that the trips proposed to result from the development are 4 in and 3 out daily, a total of 7 vehicles. But it is unclear where this data has been derived from, if this just refers to HGV's or staff. There is no breakdown provided and no clarification of where the data is derived from. Further information and detail is required.

Access Arrangements and visibility

At present there are two access points proposed to the site, an existing access point to the proposed unit and one to the neighbouring unit. The submitted Transport Statement does detail how the access points will be used but the submitted information is unclear, statements such as 'HGVs will access via the top entrance' are not specific enough. The LHA would assume that HGV's will access via the entrance closest to Clywedog Road South and will pass through the site in a one-way arrangement and exit via the entrance further away from the junction with Clywedog Road South which operates as an entrance and exit for other traffic to the site towards the staff car park. However, the proposed site plan indicates and in and out arrangement closest to the roundabout and has no clarity on the access or egress arrangements proposed. Therefore further clarification is required.

As the access arrangements are existing there are no objections in principle to the use of these, the visibility splays have previously been agreed. The LHA would recommend that appropriate lining and signing within the site would be beneficial to enforce the proposed access / egress arrangements.

There is no clearly defined pedestrian path to the proposed or existing building within the site and the LHA requests that this is clarified and that safe and clearly defined pedestrian routes are provided to the site entrance, cycle and car parking provision.

Active Travel

The submitted Transport Statement makes reference to the CIHT Providing for Journeys on foot which whilst is a UK respected publication is not specific to Wales, a review of the Welsh Governments Active Travel Act guidance would have be beneficial in this instance.

The submitted Transport Statement references the local bus services that front on to the site on both sides of Bridge Road and it is noted that just north of the site access points on Bridge Road there is an existing controlled pedestrian crossing facility which provides an acceptable facility to allow pedestrians to access the bus stop on the south side of Bridge Road.

The submitted information in the Transport Statement indicates that there is already a cycle to work scheme in place at the site which 7% of the workforce are signed up to and indicates that this will be rolled out to new staff. But no details have been provided to indicate what this entails and what the infrastructure for cyclists at the site is, are there changing rooms, drying facilities, showers and lockers? Clarification is required.

Car Parking and Cycle Parking

The submitted Transport Statement makes reference to WCBC's LPGN 16 which sets out the required car and cycle parking standards for the proposed B2 but makes no reference to the number of existing cycle and car parking spaces within the site, the usage level of those or the proposed provision as a result of the proposals. The standards state that 1 car parking space should be provided per 50 m squared of B2 floorspace, therefore upto 57 car parking spaces could be provided for the use. No clarification has been made on the existing provision or use of the existing car parking spaces. It is understood that there will be an additional 12 staff on site as a result of the proposals and it must be borne in mind that the WCBC car parking standards are maximum standards. But insufficient information has been provided to indicate that there is adequate parking within the site to service the development and for the proposed additional staff. Further clarification and an updated site layout plan defining the proposed car parking within the site is required.

LPGN 16 states that for B2 use the provision of 1 cycle parking space per 500 sq m of floorspace for B2 use should be provided. Therefore the provision of an additional 6 cycle parking spaces should be provided, in a secure covered arrangement to fit the specification set out for long stay parking within LPG16. Insufficient information has been provided, therefore further information is required.

The submitted Transportation Statement indicates that parking for 12 HGV's is provided within the site, it is considered that there is adequate space to accommodate these vehicles and for them to manoevre within the site.

Swept Paths

The submitted Transportation Statement makes reference to swept paths for HGV's within the site, but does not provide them, further information and swept paths should be provided.

Conclusion

Whilst there are no objections in principle to the proposals there is a lack of information in relation to the existing operation of the site and the proposals submitted. Further information is required in order to fully assess the implications of the proposals, as follows:

- Swept paths for HGV's through the site
- Clarification on the existing car parking provision and layout, and current usage of the existing parking
- Clarification over the proposed car parking provision and layout for the site
- Clarification over the existing cycle parking provision and associated facilities within the site
- Clarification over the proposed cycle parking provision and design of the proposed facilities
- Clarification is also requested about safe pedestrian access from the proposed building to the proposed car parking and cycle parking and to the site entrances.
- Clarification over the proposed access / egress arrangements, safe designated pedestrian route into and out of the site away from HGV traffic.



on behalf of Chief Officer, Environment & Technical