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:	29/05/2025		

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 09/05/2025 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 aluminium 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. Clarification should be provided.

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 existing unit. The submitted information details how the access points will be used and states that the 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 therefore the removal of the exit from this access may be beneficial as it would narrow down the pedestrian crossing area proposed for staff accessing the proposed unit. The updated plan (Revision B) still shows the access at the existing width, however, the applicant has detailed that there will be control signage to prevent egress from the access point and to reinforce the HGV one way system, it may be beneficial to install a physical barrier to ensure that this is reduced in width.

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 was previously no clearly defined pedestrian path to the proposed building shown within the plans whilst an indicative path how now been shown, the LHA would recommend that this is added to the proposal drawing and to consider lighting and security along the path to the new building, whilst the applicant has demonstrated existing routes within the site the LHA requests that these arrangements are shown on the proposals plan alongside the 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 site could benefit from the installation of tactile paving across the two site accesses on Bridge Road, the LHA would request these are secured via a Section 278 agreement.

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 limited 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? The further submissions indicate there is a changing block and two bike sheds are shown, one appears to have 5 number Sheffield stands for bikes (which could accommodate 10 cycles) but doesn't appear to be in a secure lockable compound despite being covered, the other stand looks like it's more appropriate for use by motorcycles but doesn't appear to have any locking points. It is the LHA's view that improved facilities should be provided and the usage of the cycle parking clarified, the applicant states there is capacity but provides no specific details.

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 did not make 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, a parking audit would be beneficial to demonstrate the existing usage of the car park. The standards state that 1 car parking space should be provided per 50 sqm of B2 floorspace, therefore upto 57 car parking spaces could be provided for the proposed use. No clarification has been made on the existing provision or use of the existing car parking spaces. The initial information submitted stated that there would be an additional 12 staff on site as a result of the proposals but the latest information submitted details that there are 45 existing staff and there will be a total of 55 proposed at the site as a result of the proposals.

Whilst the WCBC car parking standards are maximum standards, the LHA is concerned that there is insufficient information to evidence that the proposed car parking will be adequate to support the site. Further information has been provided which references 4 no reclaimed parking spaces and 5 no additional spaces, which would appear to increase the parking provision by 9 spaces within the site, however some of these parking spaces do not have the required aisle widths to be useable. No parking accumulation information has been provided to detail the current usage of the spaces and clarification to this end is requested.

Furthermore, the proposed car parking arrangements are substandard, 6m aisle widths are required behind parking spaces arranged at 90 degrees to the access aisle, the presence of oblique arranged car parking spaces in the centre of the car park clashes with the aisle widths required. A further review of the car parking arrangements are required to comply with the standard dimensions set out in LPGN16.

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. Further information has been provided in relation to the existing cycle parking but it is felt that some of the spaces are not adequate for cycle use as they do not have racks or locking spaces, these should be improved to comply with the standards set out in LPGN16, it is felt that they may have been installed for motorcycle parking. Further information has been provided detailing that there are 5 number showers provided, lockers and changing facilities, it is felt that these are acceptable for the proposed uplift in staff at the site.

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 did not provide them, subsequent information has been submitted to demonstrate there is adequate space for the circulation and parking of HGV's within the site.

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:

- Clarification on the usage of the existing parking provision
- Clarification over trips to 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 was requested about safe pedestrian access from the proposed building to the proposed car parking and further clarification in regards to lighting and markings of the path are required.
- Amendments are required to the parking layout to ensure appropriate aisle widths are provided behind all car parking spaces proposed.
- An indication of the lining and signing provided for the existing pedestrian paths should be clearly shown on the proposed site plan.
- Clarification over the proposed access / egress arrangements and appropriate signage to enforce the arrangements.
- The addition of tactile paving across the two access points on Bridge Road is required.



on behalf of Chief Officer, Environment & Technical