

## 1 INTRODUCTION

### 1.1 Preamble

- 1.1.1 Prime Transport Planning (Prime) were commissioned by FI Real Estate Management (FIREM) to prepare a Transport Statement (TS) in support of their proposals for the extension of the existing Dragon Packaging unit which is located on the corner of Clywedog Road South and Clywedog Road North in Wrexham Industrial Estate (WIE).
- 1.1.2 The application was assigned the reference P/2022/1052 by Wrexham County Borough Council (WCBC) in its role as local planning authority (LPA). An initial consultation response dated 22<sup>nd</sup> March 2023 was received from WCBC Highways in its role as local highway authority (LHA) which concluded further information was required in relation to drainage and a new trip generation exercise was required based on existing trips to the site. These comments were subsequently addressed by Prime in a Technical Note (TN01) dated 28<sup>th</sup> April 2023 which suggested detailed drainage matters would be addressed at the detailed design stage, and also provided evidence of current bespoke trip rates for Dragon Packaging to demonstrate the proposals would not have a severe impact on the highway network.
- 1.1.3 The LHA provided a second consultation response dated 7<sup>th</sup> July 2023. The LHA raised concerns regarding the number of HGVs on site in the peak hours and if the site has sufficient on-site capacity as any *'HGVs waiting to access the site may park on the public highway which would be a safety concern'*. Additional information was then provided to WCBC which demonstrated there was sufficient parking capacity for 8 HGVs and explained Dragon Packaging *'expect to have a faster turnover of HGVs on site from efficiency of operations so the prospect of parking additional rigs should be limited rather than routine'* as a result of the proposals.
- 1.1.4 The LHA provided a third consultation response dated 22<sup>nd</sup> November 2023, however the Applicant and Prime were not made aware of these comments until October 2024. The LHA have again requested further information *'in relation to the drainage arrangements at the proposed exit-only egress onto Clywedog Road South'* and further clarification *'regarding the HGV trip generation and the number of HGVs which can be accommodated on site'*.
- 1.1.5 This Technical Note (TN02) has therefore been produced in response to the above-mentioned consultation comments and intends to provide, where possible, the information and clarification requested by the LHA.

- 1.1.6 WCBC's comments/ concerns are provided in *blue italics* below, with Primes response in black standard font.

## 1.2 Development Proposal

- 1.2.1 The existing development at the Dragon Packaging site comprises a B2/B8 warehouse floorspace (1,569sqm) and offices (390sqm) over two floors. The application seeks to extend the existing warehousing on site by 1,696sqm of B8 use due to the lack of sufficient warehouse space to receive, store and dispatch goods.
- 1.2.2 Currently, multiple trailers in the yard area are used for storage which Dragon Packaging state is *'inefficient operationally and causes more problems with HGV movements in and out the premises.'* The company also loses *'a lot of time having to handball goods off pallets because of circulation and access to trailers used for storage'*.
- 1.2.3 The proposed warehouse extension will therefore provide sufficient storage, dispatch and receiving goods areas, allowing the company to organize and streamline the flow of goods in/out of the building. The proposals will also improve the management of existing HGV movements to/from the site, rather than using the service yard for storage as per current operations.

## 2 RESPONSE TO WCC COMMENTS

*As previously requested, further information is required in relation to drainage arrangements at the proposed exit-only egress onto Clywedog Road South. Highways require the requested drainage information to review in order to be able to recommend approval.*

- 2.1.1 This is noted and as such Shaw Stephens Consulting have devised a SuDS Strategy plan which will be submitted separately by the applicant.

*'It should be noted that the applicant in the report prepared by Prime Transport Planning ('Response to WCBC Comments' dated 28/04/23) provided survey data of the existing site and information on expected trip generation of the site with the proposed development in place. Based on a simple accumulation calculation from information included in Appendix I (of TN01) 'Rounded Average HGV Traffic Generation' it is shown that the site currently generates on average 49 HGV movements per day and maximum daily accumulation of HGVs is currently in the region of 6 vehicles on average. Applying the predicted traffic generation rates for the proposed development included in the same report HGV traffic generation is expected to increase to around 102 HGV movements per day with a maximum accumulation of 12 vehicles on average'*

2.1.2 It should be noted that the figures presented in TN01 were purely to provide comfort to the LHA that even when applying a worst-case hypothetical situation, such as effectively doubling the number of trips in/out of the site, that the proposals would still have a negligible impact on the surrounding highway network.

2.1.3 In reality, the number of HGV trips would not double. As stated previously in this report, the proposed warehouse extension aims to improve the existing operation of the site, and better manage the current levels of HGV trips coming to and from the site. It is worth repeating that the site currently operates as a B2/B8 unit, with Dragon Packaging having to use trailers within the service yard for storage, therefore this application seeks to extend the warehouse (B8 only) for storage, dispatch and receiving areas for goods.

*'It should be noted that the expected HGV trip generation of the site in table 2.3 of the report (TN01) is the same as the existing HGV trip generation of the site in table 2.2 (TN01) which is assumed to be an error.'*

2.1.4 This was an error and the 102 HGV movements per day quoted by WCBC above are the correct calculations, however as mentioned previously, increasing the level of trips proportionally by the gross floor area extension was purely an academic exercise to demonstrate that the proposals would have negligible impact of the surrounding highway network. It is anticipated that the current levels of HGV movements are much more realistic, however the proposals to extend the warehouse will help improve the overall operation of the site.

### 3 SUMMARY

3.1.1 This response provides the additional information that WCBC have requested. Prime trust that this response clarifies their position on each of the points raised by WCBC and will allow the scheme to be approved on Highways matters.