

Response to Highway Officers memorandum dated 29/11/2024

Site Accesses

Main Entrance onto the B5430:

The Site entrance is an existing entrance still in use by others. Vehicles leaving this site approach the highway from an oblique angle, however the LHA aren't aware of any major issues or concerns and the site has operated for many years as constructed. We have reviewed the Crash Map which does not record any crashes at the entrance over the last 10yrs.

The applicant has proposed minor improvements to pedestrian access across the entrance with tactile paving, dropped kerbing and reinstatement in tarmac, all to adoptable standards.

Visibility splays should be added to the proposed plan, and confirmation that any landscaping will be maintained to safeguard the splays, ensuring there is no obstruction greater than 1.05m high. The existing access road should include provision for drainage and detail shown on the drawing.

The visibility splays have served the access for years when it operated as a dairy farm and bottling plant. The traffic generation from its previous uses was far greater than that which is now proposed; so visibility at the junction is not particularly relevant to the proposal. However, to ensure that we meet all requirements they have been marked on the plan for your information.

Visibility splays measuring 2.4 x 43m in both directions to the nearside edge of the carriageway have been added to the submitted drawing -plan C

A note has been added to drawing plan C stating that 'no planting / landscaping will be permitted to grow within the visibility splay above height of 1.05 m off the edge of carriageway level'

It is considered that there is no requirement for drainage to be added as the site access is not altering and the surface water currently flows away from the adopted highway.

Should the application be successful, a S184 agreement will be required for the improvements work at the entrance in coordination with Wrexham Highway Roadworks Department.

The applicant will apply to WCBC streetworks departments for a S.184 agreement in order to undertake previously agreed tactile paving works at the site access.

Penypalmant Rd Access:

Due to the substandard nature of the Penypalmant Rd and its junction with the B5430 the use of the existing gated access onto Penypalmant Rd by any vehicle relating to this application should be prohibited. The applicant's agent has commented they are willing to accept a condition prohibiting the use of any vehicle in connection with the proposed change of use, but retaining existing tenant farmer and landlord-controlled use. The site plan should be amended to show how the restricted use can be controlled. Will there be secondary fencing separating the uses? What is the frequency of existing uses and is it proposed that agricultural vehicles would be utilizing the application parking area, pedestrian and access route? This may be of concern, as agricultural use may involve large tractors and pedestrians clashing unless strictly controlled/segregated.

The existing gated access onto Penypalmant Road will NOT be used by any vehicles associated with this application site.

The gate will be padlocked and none of occupiers of any unit in the application site will be given key to use this gate. A key will be given to the tenant farmer to enable him to drive to accessway A as indicated on the attached plan (Plan B).

The farmer needs this access route to enable him to pick up / drop off sheep at the fields A and B shown on plan B. The need to utilise this access is infrequent; once every couple of months at the most.

The accessway has been used for years for this very purpose – the photograph below shows the access / gate and it is clearly visible if a site inspection is considered necessary.



The tenant farmer only farms sheep; there is no longer any cattle farming at the site. Previously there was daily movement of cattle across Penypalmant Road junction through the gated access to the field across the road. However, the milking parlour has now ceased to operate, with resultant benefit to highway safety.

An internal fence will also be installed on site to prevent access from the Penypalmant Road; location demonstrated on submitted plans

Traffic Flow and Trip Generation

Regarding trip generation, can the applicant provide cumulative trips that include the adjacent industrial unit, any tenant farmer use, and farm house? Does the existing dwelling utilize the main access also, or purely access via the separate access to the North West of the site?

It has already been established that trip generation from the site is likely to be well below the previous / existing permitted use. There is considerable betterment for highway safety / capacity given that the use of HGVs will be significantly reduced.

Trip generation for agricultural vehicles will all but cease apart from infrequent sheep delivery /pick up via the Penypalmant access. The tenant farmer will not utilise the access on to the B5430.

No agricultural vehicle will enter / exit the site via the access on to B5430

The occupants of the farm house use the access on to the B5430 north west of the site – see plan B

The adjacent unit used to be the bottling plant for the dairy and there were formerly significant numbers of vehicles using the access. This has vastly reduced since the site was sold and a different business established there. Given the class use has not altered as a result of this application, trip generation data is considered to be unnecessary in this instance.

Whilst the applicant has presented suggested trip generation based on anticipated trip generation for the industrial use, we request further information on the agricultural use. This should be supplemented by some TRICS data presented in an industry standard format for the cumulative use proposed use. Whilst we note the previous use trips rates presented, and assurances that the HGV movements will be less, there is always a possibility that the units may be combined and leased to a larger industrial business and a demand for increased large articulated HGV use without any control or restrictions.

As stated above there will be no agricultural use of the B5430 access. There will be infrequent use of the Penypalmant access but the tenant farmer will not be permitted to

enter via the main site access. TRICS figures are therefore deemed unnecessary as they are no longer relevant to the application.

The applicant has confirmed that he is willing to accept a restriction on use of the site to B1 planning class use only. There will therefore be a significant drop in HGV usage of the site; a significant highway benefit compared to the previous use of the site when there was a licence for 10 HGVs and 20 trailers formerly permitted at the site.

Can the applicant confirm when the previous use ceased operation?

The previous agricultural use of the site ended in 2023

HGV permissions at the site ended when the licence ended in 2019

On Site Layout

Swept paths showing on site turning heads or turning circles for defined delivery vehicle sizes should be added to the site plan. If this is restricted to certain vehicle sizes, then this should be reflected within any approval considered.

Given that the applicant has now confirmed a willingness to apply for only B1 planning use at the site, the requirement for an HGV swept path is unnecessary as vehicle size will reduce accordingly.

Parking spaces allocated to each unit should be defined on the scaled site plan and presented in accordance with LPG16. Any shortfall against LPGN16 maximum figures should be demonstrated. Disabled spaces should also be numbered and presented in a format that can be scaled.

Parking spaces have been delineated as 2.4m x 4.8m in accordance with LPGN 16 guidance

Mobility spaces have been marked up at 10% of the overall numbers and are situated as close to the units as possible.

There is approximately 1500 sq.m of floorspace subject to a change of use application to B1.

LPGN 16 recommends a maximum parking ratio of 1 per 30 sq.m and 1 per 300 sq.m for cycle spaces

Parking space for 50 vehicles is demonstrated on the submitted plan; 5 of which are to mobility standard as required by LPGN 16

A minimum of 5 cycle lockers will be provided as per LPGN 16 requirements.

The pedestrian access provided needs to be extended further and be continuous to demonstrate how staff and visitors navigate around the site without risk of clashing with

vehicles. We are concerned at the potential for tractors and agricultural use vehicles clashing with pedestrians.

Lighting and signing improvements at the entrance and car parking areas should be shown on a plan and should be adequate for safe pedestrian access around the site in the dark.

Pedestrian access has been extended and amended. The proposed pedestrian path will be located to the south of the existing access as indicated on the plan.

Road markings will ensure a safe passage across the access on to the concrete apron / accesses to each unit.

Fencing will be constructed alongside the initial 50m of pedestrian path. The path and the road will be illuminated by the use of PIR lighting.

Further PIR lighting will be located along the front of each unit to ensure pedestrians and staff are kept safe at all times.

Provision of secure cycle storage in accordance with LPG16e, and provision of facilities such as lockers, and showers to encourage active travel should be committed to.

The location of cycle lockers has been indicated on the submitted plan.

Should the LPA be minded to support the proposal provision of a Construction Traffic Management Plan for LHA approval in advance of construction should be included for to safeguard the highway, and neighbouring business against any disruption during construction.

A CTMP can be provided if there is a planning condition requirement as part of the decision notice

Summary and Conclusion

The submitted plans should be updated and presented on a scaled engineering drawing, highlighting swept path turning facilities for all vehicles proposed, full pedestrian access, allocated parking spaces in accordance with LPG16, drainage, lighting, markings and proposed surface materials.

ALL INCLUDED ON THE PLANS

Details of how the access on Pen y Palmant Rd will be restricted to existing agricultural use only is required, and an explanation on separating agricultural access from the industrial business is required. This comment prompted the request for total trips combining all uses.

ALL INCLUDED ON THE PLANS

Having reviewed the site access, layout and areas for parking and pedestrian access, on balance, the LHA would feel more comfortable supporting a light industry use for the site.

This would reduce the probability of regular articulated HGV vehicles in reducing the probability and frequency of Articulated HGV's.

APPLICANT HAS AGREED TO LIGHT INDUSTRIAL USE ONLY

Each of the highway officer requests has now been addressed and there is no justification to refuse this application on highway grounds