

Our Ref: 3402-01/LK/1

09 October 2023

By email only:

FAO Jenni Perkins
Wrexham Borough Council
16 Lord Street
Wrexham
LL11 1LG

Dear Jenni

**PROPOSED MANUFACTURING FACILITY AND ASSOCIATED CAR PARKING AND
LANDSCAPING, IPSEN BIOPHARM, WREXHAM INDUSTRIAL ESTATE
PLANNING APPLICATION REFERENCE P/2023/0482**

Introduction

I refer to the recent consultation response from the Local Highway Authority (LHA) dated 21st September 2023 in respect of the above planning application, which is enclosed with this letter for ease of reference.

The following sections of this letter provide our response to the issues raised in the consultation response, reproduced in the same order as the 9 bullet points in the final 'conclusions' section of the consultation response.

Topic 1 – Site Access

Comments: ***“A revised site access arrangement to accommodate two-way vehicle movements. Tracking should be provided to evidence two-way movements can be achieved.”***

As indicated in sections 3.3.2 to 3.3.4 of the submitted Transport Statement (TS01b) dated July 2023, the Proposed Development operations will require the delivery of 2 articulated bulk HGV tankers of gas per week (4 two-way trips per week) and one 15T rigid HGV delivery every two days (2 two-way trips per 2 days) to transfer materials from the Ipsen industrial unit on the western side of North Ash Road, which will then be back-loaded with processed products.

The Proposed Development will not generate products for immediate distribution, instead processed products will be transferred across Ash Road North to the Ipsen distribution unit on the western side of North Ash Road for onwards distribution via the local highway network. The only articulated HGV traffic generated by the Proposed Development is therefore the delivery of gas and materials / back-loading, as discussed above.

It should therefore be emphasized that the frequency of large vehicle movements in and out of the site will be very low indeed. Two articulated HGV movements will never occur at the same time, and

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therefore the likelihood of two HGVs (whether rigid or articulated) meeting (and needing to pass one another) at the site access will be extremely low, so as to be negligible.

Furthermore, given that the single rigid HGV transfer movement every 2 days between the facility and the existing Ipsen industrial unit on the other side of Ash Road North is effectively an 'internal' movement generated by the company, the timing of these movements can easily be controlled so it does not coincide with any shift changeover patterns or bulk gas tanker deliveries.

In other words, there should be no reason to redesign the site access arrangements to accommodate the simultaneous movement of a single full size 16.5m HGV and any other vehicle (large or small) at the site access.

Turning to the 2 rigid bulk tanker deliveries per week, it is however accepted that these vehicles *could* meet a car at the narrowest point of the site access, albeit again, the frequency of such instances are likely to be very low.

Nonetheless, to address the LHA's comments, a minor scheme of widening is now proposed at the site access, as shown on the revised **drawing number 3402-01-ATR01 Rev B**, enclosed with this letter. The widening can be achieved internally within the site red-line boundary and private land ownership of the Applicant, without affecting the adopted highway.

With the proposed minor scheme of widening in place, the drawing demonstrates that a car would be able to satisfactorily pass an articulated bulk tanker vehicle at the site access.

Topic 2 – Visibility

Comments: *“A visibility splay for the site access junction in accordance with TAN18.”*

Drawing number 3402-01-ATR01 Rev B, enclosed with this letter, demonstrates that 2.4m x 120m junction visibility splays are achievable from the site access, which is commensurate with the highway standards contained in TAN18 for a 40mph road (as per the speed limit on Ash Road North).

Topic 3 – S278 Works

Comments: *“Fulfilment of snagging issues associated with the Section 278 works undertaken on Ash Road North associated with planning permission P/2017/0919, to the satisfaction of WCBC highways.”*

As noted in the LHA's response, the S278 works to improve the footways and crossing facilities are being delivered pursuant to a separate, earlier planning permission P/2017/0919, and so are not associated with this application ref P/2023/0482.

It therefore follows logically that, in planning terms, this issue should not therefore be determinative to the outcome of this application, nor delay it in any way. This application should be considered on its own planning merits, under prevailing planning law and planning policy, and not be contingent upon the outcome of a S278 Agreement scheme of works that falls under a separate consenting regime to the planning system.

Without prejudice to this, it should be noted that the S278 works have now been installed on site since around June 2023, and have been done so under the supervision of (and in liaison with) engineers at WBC. Some residual snagging works have been necessary, which is entirely normal, and unfortunately some damage has occurred to the works after they were installed. However, there is no

suggestion that the works will not be satisfactorily completed and that maintenance period will not be entered into imminently, in the normal way.

Again, and whilst it should not be determinative to this application, the Applicant is committed to improving the connectivity of the application site to their existing facilities on the western side of Ash Road North. To this end, they have recently submitted a formal pre-application request to WBC (ref ENQ/2023/0128) for feedback on a scheme to construct a new signalised puffin crossing on Ash Road North, which would have the effect of significantly upgrading the approved S278 works.

At the time of writing, further feedback on this scheme is being sought from WBC in this regard, but it should be reiterated that it is a standalone proposal, not connected to the subject application of this letter, and will be progressed separately in due course.

Topic 4 – Car Parking Spaces

Comments: *“Evidence the existing number of car parking spaces will be sufficient to meet future demand and how the 24 lost spaces will be accommodated.”*

In order to address this issue in an expedient manner, the proposed site layout plan has been revised to include an additional 24 overflow parking spaces (making 288 in overall total), which have been added in the south-eastern corner of the overall site. This is shown on the revised site layout plan (**drawing number 2227 IED LMA XX XX DR A 9516 Rev P6**, enclosed with this letter).

These spaces will be laid out as overflow spaces, and can therefore be delivered in a manner that is sympathetic to bio-diversity.

This therefore satisfies this comment, and no parking beat surveys are considered to be necessary.

Topic 5 – Shift Changeovers

Comments: *“Clarification on how and where parking will be managed during shift changeovers to ensure there is sufficient capacity.”*

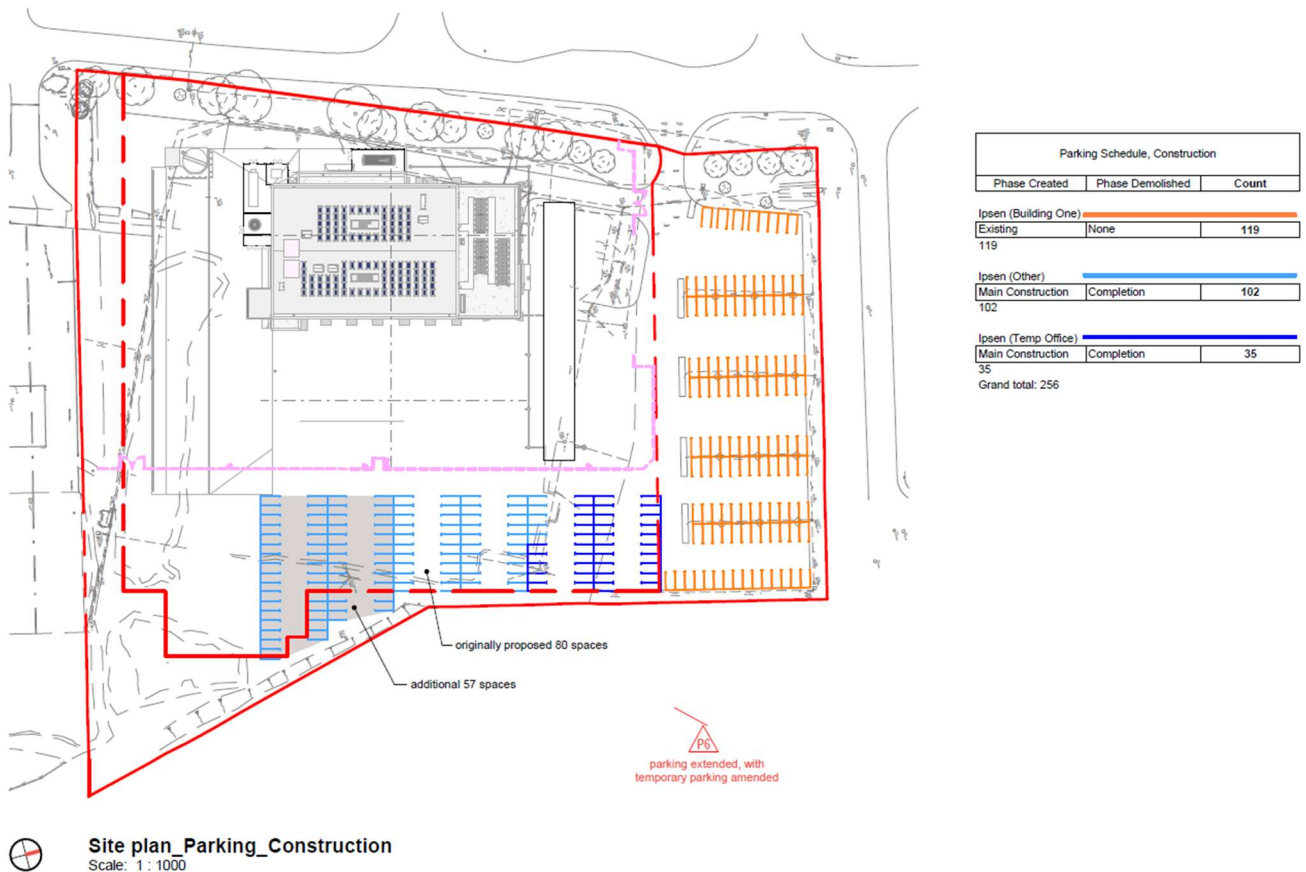
In terms of the comments on shift changeovers, these are considered to be satisfactorily addressed by virtue of the addition of 24 spaces to the overall layout, as discussed above and shown on the drawing enclosed with this letter.

Topic 6 – Parking Phasing Plan

Comments: *“A parking phasing plan showing parking arrangements during the construction period and how parking will be phased with the temporary office building.”*

The sketch below shows how the temporary parking layout would work during the construction. A total of 256 spaces would be retained at all times, in advance of the Proposed NDP Building being completed, at which stage the parking layout on the drawing enclosed with this letter would be available for use.

During construction, all contractor parking demand and laydown areas will be provided for within the pink dashed hoarding line shown on the sketch below, therefore contractors will not need any of the surrounding 256 spaces, which would remain open for Ipsen staff to utilise.



Topic 7 – Accessible Parking Spaces

Comments: “Clarification on the number and location of accessible car parking spaces.”

Technically, the LPG16 requirement for the provision of 10% accessible bays should only apply to those new spaces that are to be added for the Proposed Development (i.e. 10% of 24 = 3 spaces). These are shown on the revised site layout plan (**drawing number 2227 IED LMA XX XX DR A 9516 Rev P6** enclosed with this letter).

Notwithstanding this, the revised site layout plan also demonstrates that, as part of the reorganisation of the existing 145 spaces within the red-line boundary, 15 further accessible standard bays will also be added, to effectively retrospectively improve provision for those existing Ipsen staff members who need it.

It is considered that the detailed design for the car park layout (including precise setting out, lighting and drainage details etc) can be secured by a suitable planning condition.

Topic 8 – Cycle Parking

Comments: “Clarification on the proposed provision and location of cycle parking.”

Again, it is considered that the details of some secure, covered cycle parking facilities within the site can be secured by means of a suitably-worded planning condition. Any such condition should however cognisant of the fact that an unfettered B2 land use is not being applied for (see the restrictive condition

wording suggested in section 3.3.13 of the Transport Statement), and also in recognition of the proposed staff numbers, and low absolute cyclists that have been forecast (see Table 3.1 on pg. 13 of the Transport Statement which suggests only 1 staff cycle trip would be generated per day).

Topic 9 – Travel Plan Initiatives (Cycling)

Comments: *“Details of staff travel initiatives and measures to encourage cycling.”*

Ipsen are a conscientious employer within Wrexham that are committed to the health and wellbeing of their staff. There are a range of measures that could be introduced at the Proposed Building to encourage more cycle journeys to work.

At the same time, it must again be reiterated that an unfettered B2 use has not been applied for, and the relative density of staff working at the site will therefore be materially lower than if this was otherwise the case (and thus the potential cycle to work journeys will be lower as a result).

Nonetheless, a range of measures to encourage cycling amongst staff could be considered by Ipsen, including (not exclusively):-

- i. Introduction of a cycle-to-work scheme, with interest free loans for bicycle purchase;
- ii. Provision of suitable secure, covered cycle parking facilities and shower / changing facilities (see above);
- iii. Distribution of cycle-related information to staff – for example emails and noticeboards with local cycle route maps, information on the cycle parking and shower facilities locations, information on the health benefits of cycling, information on the cost-savings associated with cycling compared to driving etc;
- iv. Establishment of groups to allow staff to cycle to work together;
- v. Provision of a cycle repair station at the site;
- vi. Provision of fluorescent clothing to improve cycle safety for staff; and
- vii. Provide personalised journey planning for staff interested in cycling.

Again, the provision of some or all of these measures could be secured by means of a suitably worded Travel Plan condition or similar.

In conclusion, it is therefore considered that this letter satisfactorily addresses the points raised in the LHA's consultation response dated 21st September, and the revised scheme is therefore commended for approval to WBC.

I trust this is of assistance.

Yours faithfully



Lee Kendall

Technical Director on behalf of Axis

*Enc: Enclosure 1 – LHA Response Dated 21st September 2023
Enclosure 2 – Drawing Number 3402-01-ATR01B – Swept Path Analysis and Visibility Splays
Enclosure 3 – Drawing Number 9516_IED-LMA-XX-XX-DR-A-9516-P6 – Parking Plan*

MEMORANDUM



From:	Chief Officer, Environment & Technical	To:	Chief Officer Planning & Regulatory
Our Ref:	ET/DC/MM/P/2023/0482	FAO:	Jenni Perkins
		Your Ref:	P/2023/0482
Date:	21 September 2023		

Land at Ash Road North, Wrexham Industrial Estate, LL13 9JT Construction of manufacturing facility and associated car parking and landscaping

Further to previous correspondence dated 11/08/2023 I comment as follows:-

The proposal is for construction of a 3-storey manufacturing facility of approximately 11,220m² on the eastern side of Ash Road North at Wrexham Industrial Estate. This would supplement existing Ipsen facilities located on the western side of Ash Road North.

A previous warehouse was demolished on the site in 2019. At present a portion of the site is used for overflow parking by Ipsen staff working on the western side of Ash Road North.

A separate planning application has been submitted under reference P/2023/0113 for a temporary office building, this would be located within the boundary of this application. The application for the temporary office is for a period of up to five years.

A Transport Statement (TS) has been prepared on behalf of the applicant by Axis, dated July 2023. A review of this has informed the below response.

Site Access and Layout

The development site is located on Ash Road North, an unclassified road subject to a 40mph speed limit.

It is proposed the existing access will be retained for the development. Swept path drawings have been provided for a 16.5m rigid HGV and 15T tanker, the largest vehicles which will access the site. The access is approximately 6.5m wide at its narrowest point. As such the tracking indicates there is insufficient width to allow a car to pass while a HGV is entering/exiting the site. WCBC request the access is widened to permit two-way vehicle movements with revised tracking demonstrating this arrangement.

Swept path drawings indicate HGV access to the servicing area at the southern side of the building. This demonstrates HGVs will have sufficient space to enter and exit the servicing area in forward gear and is accepted.

WCBC request a visibility splay is provided for the existing site access junction in accordance with TAN18.

Accessibility

A Section 38/278 planning condition was agreed as part of planning permission P/2017/0919 in relation to the footways/pedestrian facilities between the applicant's existing site on the west side of Ash Road North and the site of the proposed development. The works are detailed in WCBCs pre-application response under ENQ/2023/0001.

WCBC highways confirm these works have been completed but are subject to defects and snagging issues noted on inspection.

The applicant will need to address these issues to the satisfaction of WCBC highways prior to any approval of this application.

Road Safety

A review of collision data is presented in Section 2.3 of the TS for the five year period between 2017 to 2021. This recorded one single collision which occurred in October 2020 between two cars at the junction of Ash Road North and Abenbury Way which was classified as slight in severity.

Parking

A total of 145 car parking spaces are currently provided within the application boundary. A further 119 spaces are provided adjacent to the north of the application boundary. Drawing 2227-IED-LMA-XX-XX-DR-A-9516-P4 'Parking Phasing' is attached to the Transport Statement in Appendix D and indicates existing and final parking layouts.

Both parking areas are currently used by staff at the applicant's existing facility on the western side of Ash Road North. It is proposed as part of the development the car park will be reconfigured, however provision levels would remain unchanged. The application is requested to evidence that the provision level will be sufficient to meet future demand. This could take the form of a car parking occupancy or beat survey to understand demonstrate existing levels of demand.

Based on LPG16 10% of all spaces should be accessible spaces. WCBC request clarification from the applicant on the number and location of accessible parking spaces within the total 145 space car park within the application boundary.

A total of 24 out of the 145 car parking spaces would be allocated for staff at the proposed building. This is well below the maximum potentially permitted under LPG16 for either B2 or B8 use. The remaining spaces would continue to be used by Ipsen staff working in the facility on the western side of Ash Road North. The applicant is requested to confirm how the 24 lost spaces will be accommodated.

Cycle parking

Based on LPG16 minimum cycle parking for B2 use would be 22 spaces. Table 3.1 within the TS predicts low levels of cycle trips. Clarification is requested from the applicant on the proposed provision and location of cycle parking. Details of Ipsen's commitment to sustainable staff travel and measures to encourage cycling should be outlined in the accompanying Travel Plan.

Staff changeover

Out of a shift of 24 staff, a total of 18 would drive per shift leaving six free spaces for the incoming shift, assuming shift changes are not staggered. The TS notes during changeover periods staff would be able to utilise other car parking spaces for Ipsen staff. Clarification is requested from the applicant on how and where parking will be managed during shift changeovers to ensure there is sufficient capacity.

Parking phasing

The parking phasing drawing indicates the current and final parking layout. WCBC request a phasing plan to show parking arrangements during the construction period. This should also include parking phasing associated with the temporary office building to ensure there is no shortfall in provision.

Trip Generation

Staff at the proposed development will work on a shift basis with 24 staff per shift. Census data has been used to determine the modal split of trips to the site with 79% of staff predicted to travel by car. It is estimated the proposed development would generate in total up to 80 two-way movements per day.

It is considered staff changeover periods would comprise the busiest periods for vehicle trips. Based on the above methodology this could equate to 18 departures and 18 arrivals across a changeover period totaling a peak of 36 two-way vehicle trips.

Clarification is requested from the applicant on when changeover periods would occur to understand potential overlap with network peak periods.

HGV trip generation will comprise two bulk tankers per week and one HGV delivery every two days to the applicant's existing site on the other side of Ash Road North. As a worst case this could generate two HGVs per day should delivery days overlap. These will take place during core hours outside of staff changeover periods. This is accepted.

Construction Traffic Management Plan

The applicant commits to creating a Construction Traffic Management Plan (CTMP) as part of their application. This should be submitted and approved prior to commencement.

The plan will need to include details of the proposed daily construction vehicle movements and details of wheel washing facilities, construction signage and any traffic management measures.

Conclusion

The following further information is required for approval:

- A revised site access arrangement to accommodate two-way vehicle movements. Tracking should be provided to evidence two-way movements can be achieved.
- A visibility splay for the site access junction in accordance with TAN18.
- Fulfilment of snagging issues associated with the Section 278 works undertaken on Ash Road North associated with planning permission P/2017/0919, to the satisfaction of WCBC highways.
- Evidence the existing number of car parking spaces will be sufficient to meet future demand and how the 24 lost spaces will be accommodated.
- Clarification on how and where parking will be managed during shift changeovers to ensure there is sufficient capacity.

- A parking phasing plan showing parking arrangements during the construction period and how parking will be phased with the temporary office building.
- Clarification on the number and location of accessible car parking spaces.
- Clarification on the proposed provision and location of cycle parking.
- Details of staff travel initiatives and measures to encourage cycling.

A handwritten signature in dark ink, appearing to read 'R. White', is positioned above the title. The signature is fluid and cursive.

Chief Officer, Environment & Technical

16.5m HGV In (Tanker)

main Ipsen Campus

Car passing a large HGV tanker vehicle

Minor widening of site access internally

16.5m HGV Out (Tanker)

main Ipsen Campus

Car passing a large HGV tanker vehicle

Minor widening of site access internally

15T Rigid in and Out (Note - Simultaneous Movements Would Not Occur)

main Ipsen Campus

2.4m x 120m Junction visibility splay

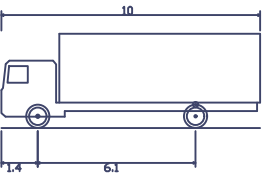
Minor widening of site access internally

2.4m x 120m Junction visibility splay

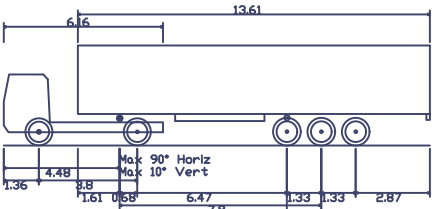
Approximate Application Site Boundary

Approximate Land Ownership Boundary

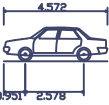
Vehicles Used In Tracking:



FTA Design HG Rigid Vehicle (1998)
Overall Length 10.000m
Overall Width 2.500m
Overall Body Height 3.645m
Min Body Ground Clearance 0.440m
Track Width 2.470m
Lock to lock time 3.00s
Kerb to Kerb Turning Radius 11.000m



FTA Design Articulated Vehicle (1998)
Overall Length 16.480m
Overall Width 2.550m
Overall Body Height 3.870m
Min Body Ground Clearance 0.515m
Max Track Width 2.470m
Lock to lock time 3.00s
Kerb to Kerb Turning Radius 6.550m



Skoda Octavia
Overall Length 4.572m
Overall Width 1.769m
Overall Body Height 1.488m
Min Body Ground Clearance 0.249m
Max Track Width 1.713m
Lock to lock time 4.00s
Kerb to Kerb Turning Radius 5.100m

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Client

Ipsen

Project

Ipsen NDP Building

Drawing Title

Sweep Path Analysis and Visibility Splays

Scale

1:1000 @A3

Date

13.07.23

Dwg no

3402-01-ATR01

Status

Prelim

Drawn

Checked

Rev

B



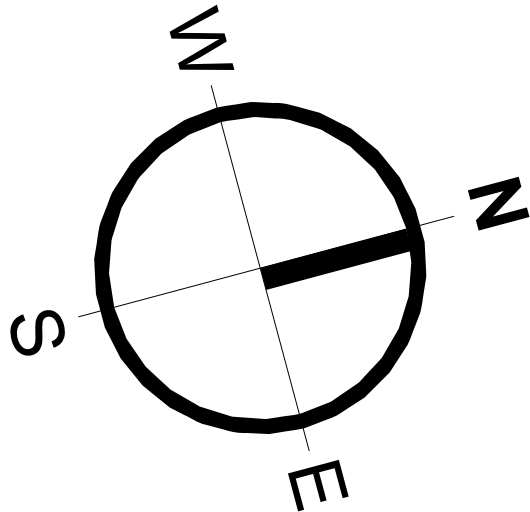
revision: B desc: Updated Layout

date: 09-10-23



Notes
Figured dimensions are to be used in all case.
Dimensions should not be scaled from drawing
All existing dimensions should be checked on site before commencement of the work.
Any discrepancies in dimensions should be clarified with the Architect prior to commencement of the work.
No deviation from this drawing will be permitted without the prior written consent of the Architect.
This drawing is to be read in conjunction with all the relevant Mechanical and Electrical drawings.
This drawing is to be read in conjunction with the relevant Structural Engineer's drawings, structural calculations and recommendations.
This drawing is to be read in conjunction with the relevant Fire Safety Strategy drawings

This drawing is copyright and to be returned to the architect on completion of the contract.



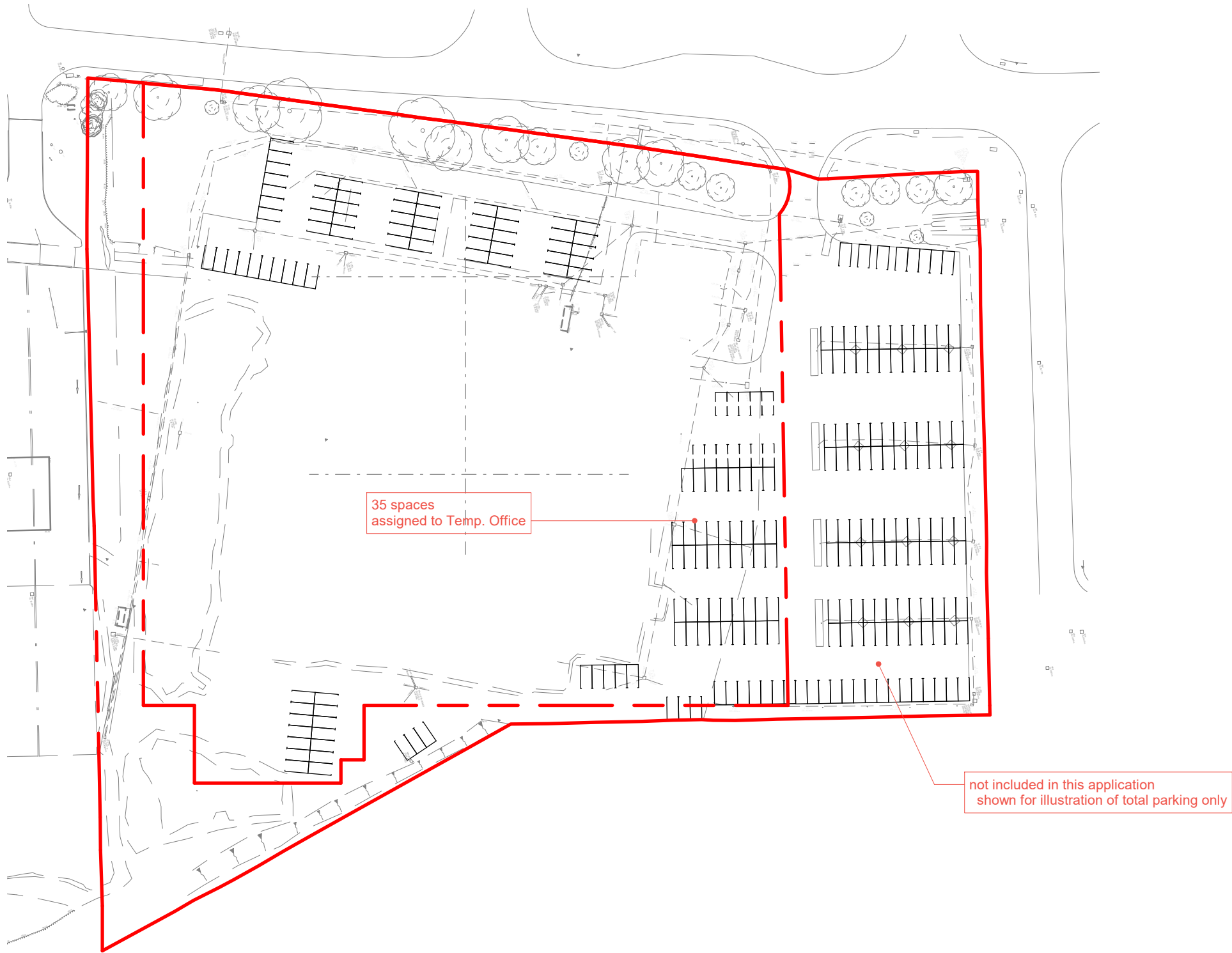
Parking Schedule, Existing		
Phase Created	Phase Demolished	Count
Ipsen (Building One)		
Existing	None	119
Ipsen (Other)		
Existing	Temp. Office	12
Existing	Main Construction	41
Ipsen (Temp Office)		
Existing	Main Construction	35
Proserve		
Existing	Main Construction	57
Grand total: 264		

Parking Schedule, Completion		
Phase Created	Phase Demolished	Count
Ipsen (Building One)		
Existing	None	119
Ipsen (NDP, Final)		
Completion	None	24
Ipsen (Other, Final)		
Completion	None	145
Grand total: 288		

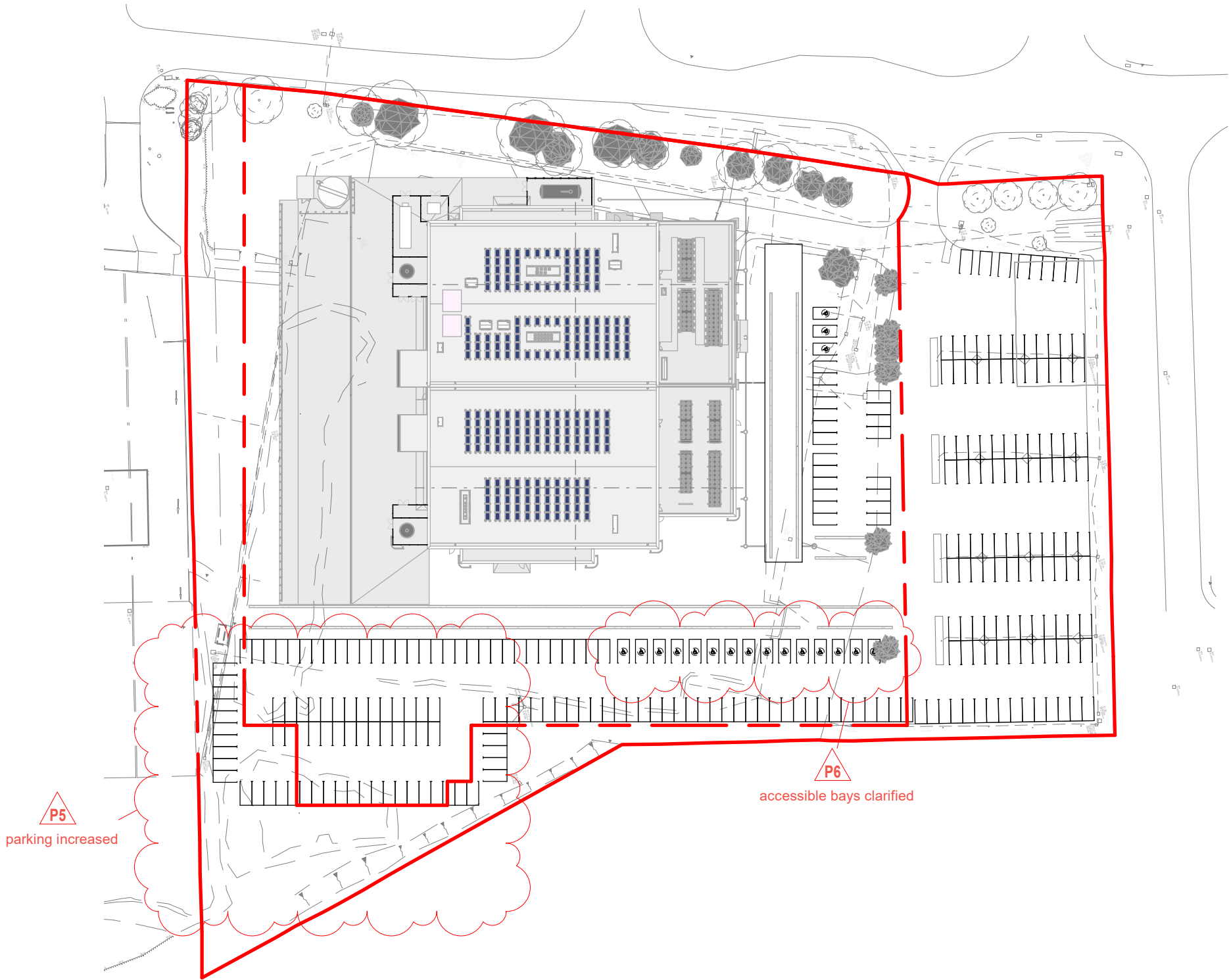
incl. 15 accessible bays

PS parking increased

P6 accessible bays clarified



Site plan_Parking_existing-a
Scale: 1 : 1000



Site plan_Parking_Complete-a

P6	accessible spaces to reposition clarified	EmR	CR	231005
P5	parking amended to southeast- 24 spaces added, substation omitted.	EmR	CR	231003
P4	construction phase parking layout omitted	EmR	-	230704
P3	parking extended to southeast corner, realine amended, temporary parking amended, number of final and intermediate spaces increased.	EmR	-	230629
P2	update to outlines	EmR	-	230503
P1	First Issue of Drawing (Derived from 9513)	EmR	-	230503
Rev.	Revision description	Drawn	Checked	Date



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Project
NDPF
Wrexham

Title
SKETCH-Parking phasing

LMA Project		Drawing number						Rev.	
Project	Originator	Zone	Level	Type	Rev	DrawingNumber			
2227	IED	LMA	XX	XX	DR	A	9516	P6	