

Planning Service
Wrexham County Borough Council
16 Lord Street
Wrexham
LL11 1LG

Our ref: 3523-CAU-XX-XX-CO-T-9103.A0-C1

Date: 30 August 2019

FAO Sharon Holman

Dear Sharon,

Proposed Extension to Warehouse Building, at 2 Elm Point, Abbey Road North, Wrexham Industrial Estate, Wrexham.
Planning Application Reference P/2019/0593

I refer to the above proposal and in particular to your email dated 23 August 2019 regarding the response received from highways dated 22 August 2019.

Traffic Generation

In terms of traffic generation, I have been in discussions with my client and can provide the additional details below:

Movements	Existing Site	Proposed Extension Site
Daily Car Movements	57	6
Daily HGV Movements	24	6
TOTAL	81	93

Employees

In order to clarify the employment figures, the 80-existing staff referred to in the submission are divided across all three McCarthy Distribution sites, with the 20 proposed employees as a result of this extension, also being split across the three sites. Therefore, in terms of the current application site, it is envisaged that this will create an additional requirement for 6 employees, but that these would be on a 3 and 3 split due to shift working patterns.

As a result of the above and noting that the car parking standards referred to are maximum standards, it is considered that the numbers of car parking spaces at the site are sufficient for the additional staff numbers being predicted without causing harm to highway safety.



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In addition, McCarthy Distribution have provided cycle parking and shower/changing facilities at the existing site, in order to encourage employees to cycle to work-thereby reducing demand on available car parking spaces at the site.

The requested inclusion of a condition on the decision to state that the development shall be for the benefit of McCarthy Distribution only would not be acceptable to my client. It is unreasonable, wholly unnecessary and in any event, would not meet the standard six tests of conditions. The tests for conditions as outlined in The Use of Planning Conditions in Development Management Circular WGC 016/2014 are that they shall be:

- (i) necessary;
- (ii) relevant to planning;
- (iii) relevant to the development to be permitted;
- (iv) enforceable;
- (v) precise; and
- (vi) reasonable in all other respects.

As you will be aware, the Circular stresses that conditions should only be imposed where they are both necessary and reasonable, as well as enforceable, precise and relevant both to planning and to the development to be permitted. Attention is particularly drawn to paragraphs 3.2 to 3.9 of the Circular which advises that in considering whether a condition is necessary authorities should ask themselves whether planning permission would have to be refused if the requirements of that condition were not imposed. For the aforementioned reasons, I do not believe the condition is warranted.

Service and Delivery Management Plan (SDMP)

I would suggest that the request for an updated SDMP is a little premature and can adequately be dealt with by the imposition of a suitable condition on any approval.

I trust that this response will be forwarded to highways and addresses the queries raised to date, however if you require anything further, please do not hesitate to contact me.

Yours faithfully



Clive Cunio
Associate Planner
On behalf of Caulmert Ltd