1 INTRODUCTION

1.1 Purpose of Report

1.1.1 Prime Transport Planning ('Prime') was commissioned by FI Real Estate Management ('FIREM') to provide highway and transportation advice in relation to the proposals for a:

> *Proposed employment unit and new vehicular access, car and HGV parking, servicing and storage area, landscaping and ancillary development on land at Oak Road, Wrexham Industrial Estate, Wrexham, LL13 9RG.*

1.1.2 Prime had originally submitted a Transport Statement (TS) as part of the planning application (ref: P/2025/0430) for the above scheme. The application was validated in May 2025, however WCBC Highways provided a consultation response dated 21st July 2025 which requested additional information and the requirement for a detailed TA. The previous TS has therefore been updated to a TA to address the points raised by WCBC and include a capacity assessment on the proposed site accesses. This Technical Note 01 (TN1) has been produced separately by Prime to highlight the sections of the TA which have been updated to enable WCBC to undertake a review of the additional information provided.

1.1.3 This TN01 also addresses certain points raised which could not be appropriately addressed within the updated TA, and intends to provide, where possible, the information and clarification on the points raised by WCBC.

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

1.1.5 Reasonable checks have been carried out on any third-party information used in the preparation of this report but, nonetheless, Prime Transport Planning accepts no liability for the accuracy or otherwise of this data.

1.1.6 Third-party rights are excluded for the use of information contained within this report.

2 RESPONSE TO WCBC COMMENTS

2.1 Access

WCBC: There is an existing 3.6m wide access currently serving the site which currently has inadequate visibility ie/ approximately 2.4 x 35m to the west and 50m to the east measured to the nearside edge. Visibility is impeded by the existing vegetation along the site frontage. This access will need to be closed up if the application is supported.

2.1.1 This is addressed in paragraph 4.2.4 of the TA.

WCBC: The LHA recommend that this detail is provided (both speed survey data and traffic counts, including classification of vehicles in order that the % of HGVs can be ascertained).

2.1.2 Section 3.3 of the TA has been updated to provide additional details of the Automatic Traffic Count (ATC) survey and calculations using recorded turning count surveys from the approved 'Kingmoor' application (ref: P/2023/0280) to derive the HGV percentage. The raw data is provided in Appendix B of the TA and HGV percentage calculations are provided in Appendix C.

WCBC: Adequate forward visibility will be required for vehicles approaching from the east to vehicles turning into the proposed access providing a stopping sight distance of 120m. This detail has not been indicated on the submitted layout plan. The LHA recommend that this detail is indicated on a suitably scaled layout plan.

2.1.3 120m forward visibility in line with the 40mph speed limit is now shown on Drawing P24012-001F in Appendix E of the TA.

WCBC: Security gates are to be provided at both the access and egress. It is required that these gates be set back from the highway sufficiently that a waiting articulated vehicle will not obstruct or impeded highway operation.

2.1.4 This is now addressed in paragraph 4.2.3 of the TA.

Eastern Access

WCBC: The LHA will require the applicant to provide a 3m wide shared use footway and cycle way along the length of the proposed new footway so that in future the length of Oak Road could be provided with off-carriageway walking and cycling infrastructure. There should be compliant transition from the carriageway to the shared-use path for those travelling from the east. The LHA recommend this detail is indicated on a revised layout plan.

2.1.5 These comments are addressed in paragraph 4.3.1 in the TA and shown in Drawing P24012-001F.

WCBC: A suitable dropped kerb / tactile crossing point for the proposed cycleway/ footway will be required to cross the new access at a suitable location (not shown) ie/ towards the narrowest section of the access. The width of crossing must be at least as wide as the path either side, 3m in this case. The LHA recommend this detail is indicated on a revised layout plan.

2.1.6 These comments are addressed in paragraph 4.3.3 in the TA and shown in Drawing P24012-001F.

Western Access

WCBC: A suitable dropped kerb / tactile crossing point for the proposed cycleway/ footway will be required to cross the new access at a suitable location (not shown) ie/ towards the narrowest section of the access. The width of crossing to be at least as wide as the path either side. On shared use paths, 3m min. There should be compliant transition from the shared-use path to the carriageway for those travelling to the west. The LHA recommend this detail is indicated on a revised layout plan.

2.1.7 As above, these comments are addressed in paragraphs 4.3.1 and 4.3.3 in the TA and shown in Drawing P24012-001F.

Proposed Access off Oak Road to West of Westerly Access

WCBC: There appears to be a new access proposed onto Oak Road located a short distance west of the westerly access. However, it is not clear what purpose this access serves and what size/ frequency of vehicles will be using this access. The LHA request clarification on this detail.

2.1.8 This is addressed in paragraph 4.2.5 of the TA.

2.2 Proposed Pedestrian / Cycle Access

WCBC: The LHA recommend that any proposed cycleway / footway is provided across the whole site frontage and indicated on a revised layout plan.

2.2.1 These comments are addressed in paragraph 4.3.1 in the TA and shown in Drawing P24012-001F.

WCBC: A crossing point will need to be provided across Oak Road to reach the nearby bus stops on Oak Road and Abbey Road South. The crossing facility to be provided will depend on the traffic data and should align with the most recent Active Travel Act Guidance (2021 at the time of writing). This will need to be reviewed in the required Transport Assessment. The LHA recommend that this detail is indicated on a revised layout plan.

2.2.2 These comments are addressed in paragraphs 4.3.4 through to paragraph 4.3.7 in the TA and shown in Drawing P24012-001F.

> *WCBC: No specific details of the proposed cycle stands, secure storage, shelters appear to have been provided. The LHA recommend that this detail is indicated on a suitably scaled plan (including annotated dimensions). LPGN 16 (Class B2 Use) requires 1 cycle space per 500m² gross floor space equating to a minimum of 15 spaces.*

2.2.3 This is noted, and as such a detailed plan has been produced by MCAU and included in Appendix G of the TA. Paragraphs 4.6.9 and 4.6.10 of the TA also provide some additional information.

> *WCBC: The Transport Statement references an outdated Wrexham cycle map. The LHA stipulate that the Active Travel Network Map (ATNM) for Wrexham should be used instead and reviewed in the required Transport Assessment. The ATNM shows that the southern section of the route along Bryn Lane is not currently suitable though a future route for walking and cycling is proposed, along with the full length of Oak Road.*

2.2.4 This is noted, and as such the map has been updated in the TA, with paragraphs 5.3.3 and 5.3.4 providing some additional information relating to existing and future cycle infrastructure.

2.3 Swept Path Details

> *WCBC: Swept path details of a large car and 16.5m HGVs have been demonstrated as capable of safely accessing the site through the 2 access points. However, if various sized rigid HGVs are intended to be used then such vehicles need to be specified with their associated swept path details being provided. The LHA also recommend that additional swept path details of all HGVs (articulated and rigid of various lengths) intended to be accommodated at the site are provided indicating how they will park in their intended spaces and reverse out of them to exit the site.*

2.3.1 This is noted, and as such, additional swept path analysis drawings have been produced of a 12m long rigid vehicle, a 14.5m articulated HGV and a 10.2m long tipper truck and included in Appendix E of the TA. Updated descriptions of the swept path analysis are also provided in paragraphs 4.5.1 and 4.5.2 of the TA.

> *WCBC: The LHA recommend the applicant clarifies why the proposed HGV spaces are only 12m long when 16.5m articulated vehicles may visit the site and require parking.*

2.3.2 Information regarding the 12m long bays is provided in paragraph 4.6.1 of the TA.

2.4 Parking & Turning Provision

WCBC: Assuming the proposed use to be entirely Class B2 Use (1 space per 50m2 gfa), would equate to the maximum requirement of 147 spaces. However, it is not clear as to precisely what proportion of Class B8 Use is intended. The LHA recommend the applicant provides this detail.

2.4.1 As mentioned in the TA, the proposed unit will be predominantly manufacturing led, therefore most calculations within the TA have been based on B2 use class only. The parking provision is a specific requirement which has been specified by HIAB. Whilst it is recognised this is below the 'maximum' standards, a detailed explanation as to why this figure is appropriate is provided in paragraphs 4.6.2 through to 4.6.4.

WCBC: The LHA understand that 140 staff will be employed at the site. There would appear to be a significant shortfall in parking provision at the site compared with maximum LPGN 16 requirements. This may well be exacerbated by the provision of 10 no. EV charging spaces should these be for exclusive use by those owning electric cars. It may be considered possible to manage the use of these spaces to maximize parking at the site by a suitable condition eg/ Car Parking Management Plan. If the application is supported, the LHA would recommend a condition is included requiring a suitable car parking management plan.

2.4.2 This is noted, and as such the applicant has clarified that they would willing to accept a planning condition to provide a suitable car parking management plan in paragraph 4.6.8 of the TA.

WCBC: No details appear to have been submitted in respect of staff working patterns ie/ do staff work shifts. Details of the maximum number of cars anticipated on site at any one time requiring parking should be provided (including staff and visitors). The LHA recommend the above information is provided.

2.4.3 Staff details are provided in paragraph 4.2.3 of the TA while the number of proposed spaces is provided within paragraphs 4.6.2 through to 4.6.4.

2.4.4 The most important point to note is that the level of parking provision proposed has been carefully considered by HIAB and reflects their operational requirements. Whilst it is recognised this falls below WCBC 'maximum' standards for B2 use which would require 147 spaces, it should be recognised that the parking standards are just that, 'maximum'. The proposed level of parking therefore reflects national and local policy which aims to reduce car dependency such as Policy LU6 in the RTP.

Prime: "Should it be deemed necessary to provide additional parking in the future for a different end user, two areas have been identified which can be converted to parking if required: one via the extension of the northern car park aisle; and another via the

extension of the eastern aisle down the eastern side of the proposed building, resulting in a slight reduction of trailer parking bays. The combined areas identified are large enough to accommodate an additional 66 spaces, resulting in a total of 148 car parking spaces, with this level of parking aligning with WCBC's 'Local Planning Guidance Note No.16' maximum parking standards for a 100% B2 unit. This has been indicated on submitted plan (Drg. No. P.02-00-003 Rev P1)."

WCBC: Any future change to the parking provision of a consented site would require a separate planning application. It cannot therefore be assumed that further parking capacity could be delivered. Therefore any parking provision necessary for this site, whether for current or future users should be provided as part of this application.

2.4.5 The 82 spaces currently shown are deemed appropriate and necessary for the proposed site and the applicant is willing to accept a condition to provide a suitable car parking management plan to ensure the car park is operated satisfactorily.

2.4.6 The applicant understands that any future changes to the parking provision would require a separate planning application, however the additional parking exercise within the TA has been undertaken to demonstrate that there is ample space within the development site to accommodate additional parking if required in the future.

2.4.7 The trip generation and capacity assessment undertaken within Section 6 of the TA has been based on a solely B2 development which demonstrates that the proposed site access and egress will operate with a substantial level of spare capacity. Therefore, should future applications be made to increase the level of parking, it has already been proven that the proposed site accesses can accommodate a higher level of parking provision in accordance with the maximum B2 use class standards.

WCBC: In order to determine whether the proposed level of parking provision is acceptable, the LHA request an appropriate parking survey is carried out which is relevant to the proposed development site.

2.4.8 This is addressed in paragraph 4.6.5 in the TA.

2.5 Vehicular Trip Generation

WCBC: The LHA therefore request that the trip generation estimates be re-worked based on sites of a comparable type, size and location.

2.5.1 This is noted, and as such the vehicular trip generation as been revisited in Section 6.2 of the TA.

2.6 Safety Audits

WCBC: It was previously recommended that any proposed new accesses in this location will require Stage 1, 2 & 3 Safety Audits. The LHA recommended that Stage 1 & 2 Safety Audits are submitted as part of any planning application to ensure a safe and satisfactory access can be provided. A Stage 1 & 2 Safety Audit has not been submitted with the application. The LHA recommend that this information is provided.

2.6.1 Prime did not receive any comments relating to the requirement for Road Safety Audits (RSA). It should be noted that a Stage 2 RSA is usually required at the completion of the detailed design stage and therefore is not possible to undertake at this stage of the application. A Stage 1 RSA has however been completed and is included in Section 7 of the TA.

2.7 Footpath Links

WCBC: I understand that it is proposed to provide footpath links from the development site to Oak Road and to the existing public footpath (PROW No. 19 – Abenbury). We would strongly recommend that you liaise with our Public Rights of Way Section on this matter – contact: Sean Hanratty on Tel: 01978 729761. Any proposed footpath links will need to be clearly indicated on a suitable layout plan.

2.7.1 The PROW section (paragraphs 5.2.1 through to 5.2.3) have now been updated in the TA. It is Prime's understanding that there are currently no plans by the applicant to make a formal and direct connection from the proposed development unit to PRoW ABE/19, however permissive footpaths are proposed throughout the ecological zone which may enable future connections to the public footpath.

2.8 Public Transport Provision

WCBC: Current public transport provision serving the industrial estate is poor. The LHA strongly recommend that you discuss the proposed development including potential funding for an improved bus service with our Public Transport Officer – Andrew Mytton on Tel: 01978 729760.

Our Public Transport Section have commented as follows:- If the application is supported, a payment of £8046 per annum (for 3 yrs) per annum is requested for the development at Oak Road which would fund a contribution to peak time only (a.m./p.m.) additional bus journeys (Mon-Fri) to this part of the Industrial Estate.

2.8.1 This is noted, and as such the applicant is willing to accept a condition to provide a public transport financial contribution of £8,046 per annum (for 3 x years).

2.9 Travel Plan

WCBC: The submitted Travel Plan is broadly acceptable, however there are some elements to re-consider and the future use of the travel plan is to be strengthened. The North Wales Joint Local Transport Plan 2015 is now out of date and the LHA recommends that the North Wales Regional Transport Plan be considered instead.

2.9.1 This is noted, and as such Sections 2.4 and 2.5 have been updated within the policy section of the TA and TP.

WCBC: An outdated cycle map of Wrexham is used, however the LHA requires that the Active Travel Network Map (ATNM) should be used as the definitive map of active travel infrastructure. The ATNM shows that the southern section of the cycle route noted on the cycle map is not suitable and does not achieve the minimum standards for a cycle route.

2.9.2 This is noted, and as such the map has been updated in the TA and TP, with paragraphs 5.3.3 and 5.3.4 providing some additional information relating to existing and future cycle infrastructure.

WCBC: The LHA recommends that the Welcome Pack is available to applicants when researching the role for which they are interested.

2.9.3 This is noted, and as such, the above request has been included in paragraph 6.2.1 of the TP.

WCBC: Once a baseline survey is complete, it is recommended by the LHA that a target is set to reduce the number of employees driving in single occupancy motor vehicles to the site.

2.9.4 This is noted, and as such paragraph 6.12.3 has been included within the updated TP.

WCBC: If HIAB have staff travel to work data for similar sites, the LHA recommend that this be utilized to propose targets for the site.

2.9.5 This is noted, however such data is note available at the time of writing these updates. Should this information become available in the future, the TP can be amended accordingly.

2.10 Surface Water Drainage

WCBC: Details of the how the new section of highway forming the access / bellmouth will be drained will need to be provided. The LHA recommend that this detail is indicated on a revised layout plan (including existing / proposed gullies).

2.10.1 This is noted, and as such, a detailed Drainage Plan Layout (TOS-BML-XX-XX-DR-C-0500) has been produced by Barnsley Marshall Ltd and is included in Appendix 1 of this report.

2.11 Proposed Lighting

2.11.1 The applicant is willing to accept a planning condition to provide a street lighting details and layout plan.

2.12 Service and Delivery Management Plan (SDMP)

2.12.1 The applicant is willing to accept a planning condition to provide a Service and Delivery Management Plan.

2.13 Construction Traffic Management Plan

2.13.1 The applicant is willing to accept a planning condition to provide a Construction Traffic Management Plan, including details of contractor parking.

3 SUMMARY AND CONCLUSION

3.1 Summary

3.1.1 It is considered that all comments raised by WCBC Highways in relation to application P/2025/0430 have been addressed within the updated TA, TP, and this TN01, as well as the updated access strategy drawings.

3.1.2 To clarify, the applicant is willing to accept the following conditions:

- Car Parking Management Plan;
- Public Transport Financial Contribution of £8046 per annum (for 3 x years);
- Street Lighting details and layout plan;
- Service and Delivery Management Plan; and
- Construction Traffic Management Plan.

3.1.3 Several updates to the TA and access strategy have been made including:

- Updates to the Regional Transport Plan in the policy section;
- Provision of traffic flow surveys and percentage of HGVs;
- Updates to the proposed 3m shared cycleway and pedestrian crossing points over the proposed access and egress;
- Additional details regarding security gates;
- Additional details regarding existing and proposed crossovers;
- Provision of a single dropped kerb crossing over Oak Road and justification for this being uncontrolled;
- Additional swept path analysis;
- Justification for size of the proposed tailer parking;

- Justification for level of proposed parking provision;
- Detailed plan of the proposed cycle store;
- Clarification of PROW connections;
- Updates to Active Travel Network Map and details on existing and future cycle facilities;
- Updates to traffic forecasting section, including trip generation and capacity assessments of the site access and egress; and
- Inclusion of a Stage 1 RSA which raised two minor issues that have now been addressed in the Designers' Response and updated drawings.

3.1.4 Minor updates have also been made to the TS, including the above, as well as:

- Updates to the Regional Transport Plan in the policy section;
- Updates to Active Travel Network Map and details on existing and future cycle facilities;
- Updates to Welcome Pack information; and
- Provision of targets.

3.2 Conclusion

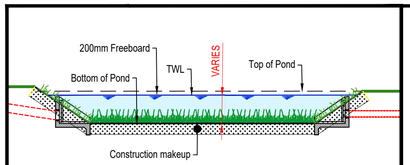
3.2.1 As concluded in the TA, there are no highway safety concerns that would preclude the delivery of the development proposals, the site is accessible by a variety of modes of transport, an appropriate level of car and cycle parking will be provided, and that the development will have a negligible impact on the operation of the surrounding highway network. As the proposal complies with local and national planning policy and guidance with respect to sustainable accessibility, safety and impact on the highway network, there are no highways or transportation related reasons why planning permission should not be granted.

3.2.2 We trust that this response clarifies the applicant's position on each of the points raised by WCBC and will allow the scheme to be approved on Highways matters.

APPENDIX 1

DRAINAGE PLAN LAYOUT

Typical Attenuation Pond

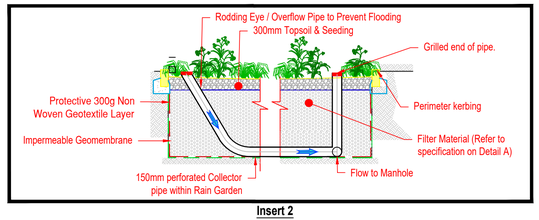


Proposed Attenuation Pond

Required Plan Footprint of Pond	: 2130m^2
Depth to base level	: 1.5m
Volume to TWL	: 2143m^3
Pond Side Slopes	: 1 in 3

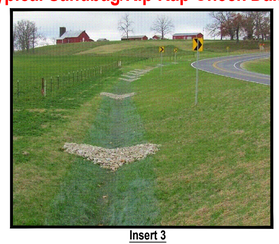
Insert 1
n.t.s

Typical Rain Garden

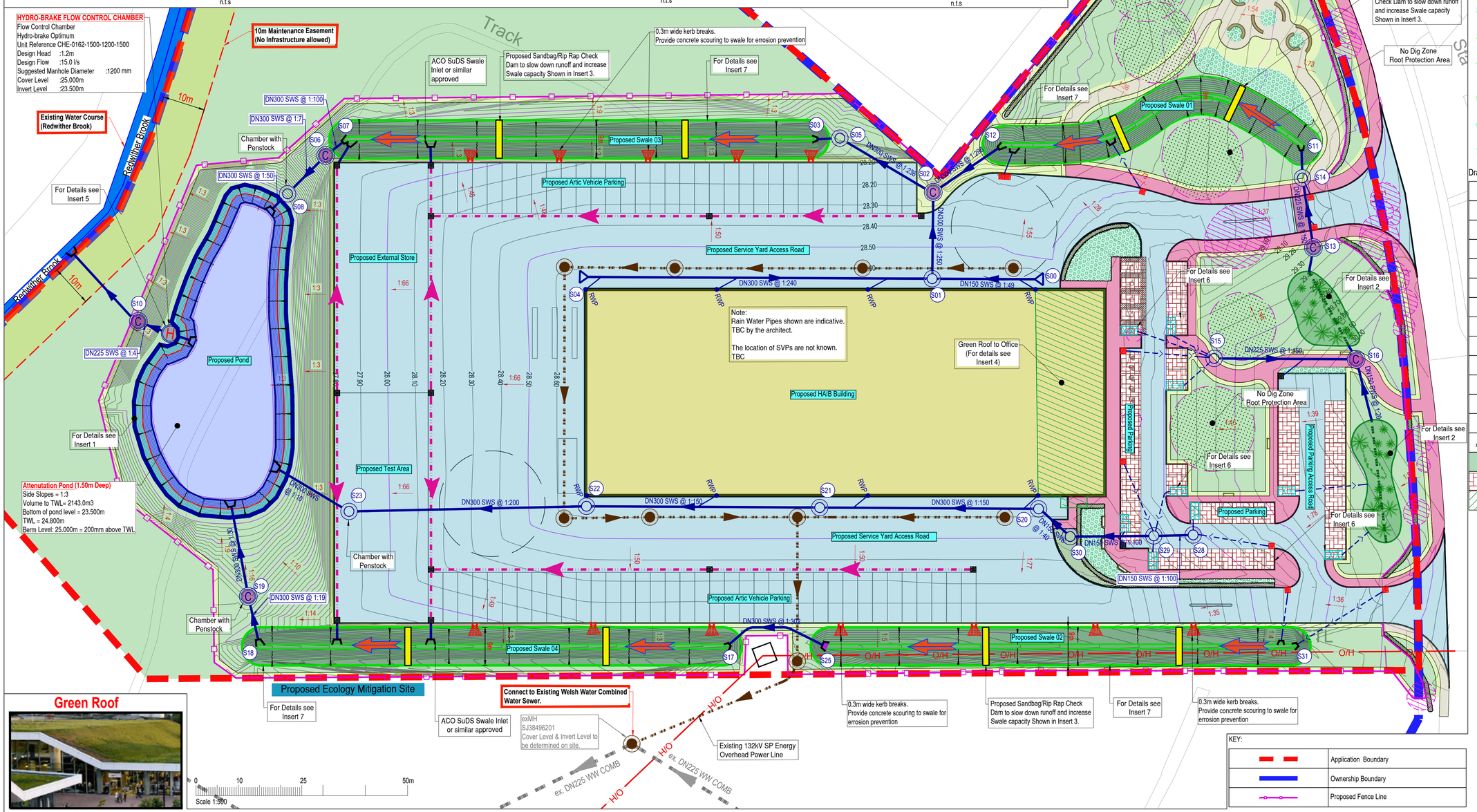


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Typical Sandbag/Rip Rap Check Dam



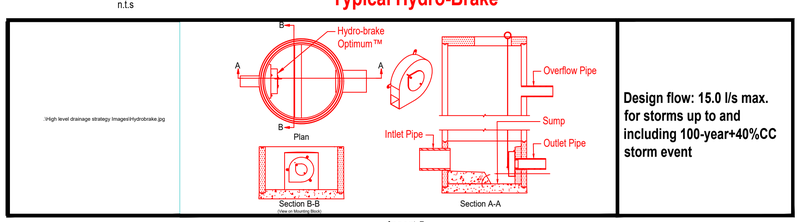
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Green Roof

Insert 4
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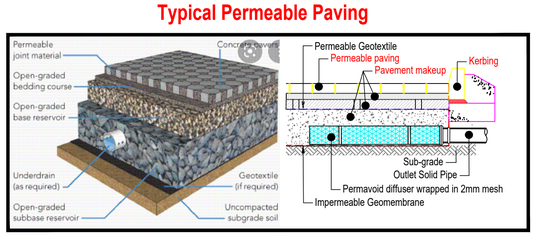
Typical Hydro-Brake



Design flow: 15.0 l/s max. for storms up to and including 100-year+40%CC storm event

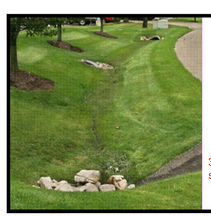
Insert 5
n.t.s

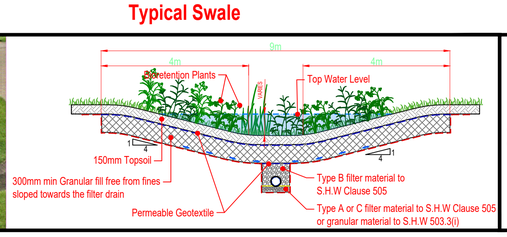
Typical Permeable Paving



Insert 6
n.t.s

Typical Swale





Allow fo 9m wide Swales

Insert 7
n.t.s

Safety, Health & Environmental Information:

In addition to the hazards and risks normally associated with the types of work detailed on this drawing, please note the significant hazards identified by symbols below,

⚠ INDICATES A RESIDUAL RISK AS A WARNING

ⓘ INDICATES A RESIDUAL RISK FOR INFORMATION

and described below:

Construction/Maintenance/Cleaning/Demolition
Refer to Drawing:

General Notes:

1. Do not scale from this drawing.
2. All dimensions are in millimetres (mm), all levels in metres (m) unless noted otherwise.
3. Discrepancies or omissions are to be reported to the Engineer prior to work commencing.
4. Materials and workmanship are to comply in all respects with current British Standard Specifications, Codes of Practice, and Building Regulations Approved Documents.
5. The copyright of this drawing is vested in the Engineer and must not be copied or reproduced without written consent.
6. The Contractor is to check and verify all building and site dimensions, levels and sewer invert levels at connection points before work commences.
7. This drawing is to be read in conjunction with all relevant specifications and drawings issued by the Engineer, Architect and other Specialists.

Drainage Key:

DNXXX SWS @ 1:XXX	Proposed Stormwater
	Proposed ACO Channel Drain
	Proposed Foul Sewer
SXX	Proposed Stormwater Manhole
FXX	Proposed Foul Sewer Manhole
SXX	Proposed Stormwater Hydro-brake
SXX	Proposed Ridgistorm Separate Catchpit
	Proposed Road Gully
	Proposed ACO Drain Gully Outlet
	DN150 Gully / RWP Connector
RWP	Proposed Rain Water Pipe
XXX	Proposed Permavoid Diffuser Unit and Connector Dimension: L=708mm x W = 354mm x D = 150m
	Proposed 0.3m wide kerb breaks
ex. DN225 WW COMB	Existing DN225 mm Welsh Water Combined Water Sewer
	Rain Garden
	Permeable Paving
	Green Roof

KEY:

	Application Boundary
	Ownership Boundary
	Proposed Fence Line

Rev	By / Chk'd	Date	Description
P03	IW/AM	09/06/2025	Updated to suit Pre-SAB comments
P02	IW/AM	20/05/2025	Drainage details updated
P01	IW/AM	04/03/2025	Preliminary issue for client comments

PRELIMINARY DRAWING
This drawing is not to be used for construction

Client
FI REAL ESTATE MANAGEMENT

BarnsleyMarshall Limited
4&5 Prior Whard
Harris Business Park, Hanbury Rd
Stoke Prior, Bromsgrove
B604FG
Tel: 01905 330550
Email: design@barnsleymarshall.co.uk
Web: www.barnsleymarshall.co.uk

Project
The Oaks Site
Wrexham Industrial Estate

Drawing
Drainage Plan Layout

By	IW/AM
Date	18/02/2025
Drawing No. (Project / Originator / Volume / Level / Type / Role / Number)	TOS-BML-XX-XX-DR-C-0500
Revision	P03
BML Job No.	1000-06
Status	-

Drawing Scale at A1: 1:500

CAD Filename: C:\Users\drhanor\OneDrive - FI - Real Estate Management\Lsd\DEVELO~1\021845~1.FIC\D2F0DA~1.FIC\C02TTH~1\Design\CIVILE~1\TOS-BM~1\TOS-BML-XX-XX-DR-C-0500 P03 - Drainage Plan Layout.dwg