MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO:	Sharon Holman
Our Ref:	ET/DC/AC/ P/2025/0563	**Your Ref:**	**P/2025/0563**
Date:	25/09/2025		

TOWN AND COUNTRY PLANNING ACT 1990

PROPOSAL: NEWID DEFNYDD YR ADEILAD O DDEFNYDD CYMYSG UN DEFNYDD I SWYDDFEYDD / LLE STORIO AMLFEDDIANNAETH (DOSBARTH DEFNYDD B1)/CHANGE OF USE OF BUILDING FROM SINGLE OCCUPANCY MIXED USE TO MULTIPLE OCCUPANCY OFFICE / STORAGE SPACE (USE CLASS B1)

LOCATION: TRINITY HALL, LLANGOLLEN ROAD, ACREFAIR, WREXHAM, LL14 3SF

With reference to your consultation / email containing the additional information for the above application, the Local Highway Authority (LHA) comment as follows:

Following initial comments from the LHA, the applicant has provided further information to respond to specific comments / request for clarification.

Site Access

The applicant has provided an updated set of vehicle swept-path drawings for movements into and out of the site access, for a number of different vehicle types. Having reviewed these drawings it appears that the base mapping used in the assessment does not reflect the layout / alignment of the access road (referred to as the unadopted road). The unadopted road on the submitted plans is shown as being absolutely straight, with both carriageway and footway of a consistent and constant width. This is not the case, with the alignment being slightly curved and with a slight dog-leg towards the junction with Llangollen Road. This introduces uncertainty as to the accuracy of this base mapping and subsequently the accuracy of the swept-path drawings. **Unfortunately, the LHA cannot accept the assessment drawings given this inaccuracy and will require the drawings and swept-paths to be re-submitted using accurate base mapping. The revised drawings should also show key dimensions, such as the carriageway width, footway width and width of the access point. The LHA would also request confirmation of the software used to produce the swept-path drawings. Some of the movements shown appear as sudden changes in direction which we would not expect to see.**

Notwithstanding the above, the proposed servicing arrangement of the site raises concerns. The proposal that refuse/waste collection be limited to vehicles of no more than 8m in length is referenced in the Design and Access Statement. Whilst this in theory could be managed by means of a suitable worded condition, this would be hard to enforce in practice and would also need to be imposed on future occupiers. The LHA are concerned that if a larger refuse collection vehicle (RCV) were to be used to service the site, this could not turn within the site curtilage and would therefore need to use the area outside of the site access to turn. This introduces potential conflict with pedestrians – particularly concerning given the adjacent school. Whilst it is acknowledged that previous uses at the site have operated HGVs, the proposed parking arrangement and gate position

appear to constrain the movements of larger vehicles. However, the revision of the swept-path drawings will be needed to inform this consideration.

The LHA would also request clarification as to what the green line shown on the swept-path drawings represents. At the site access, this line does not appear consistent with the ownership boundary on the title deeds provided.

Trip Generation / Attraction:
The LHA accept that the total trip generation / attraction for the proposals represents a reduction compared to the previous use and has no further comment in this regard.

Parking Provision:
Whilst parking provision is below the levels the LHA would hope to see, it is also recognised that this is an improvement over the previous provision. The Design and Access statement does outline that the on-street spaces will be used to provide additional parking. However, even if these fall in the applicant's ownership, there is no mechanism to control the use of these spaces to ensure they are available for those based at the application site. A review of Google imagery suggests that these spaces are frequently used for local parking, including during the day, with the same vehicles present across different images. The four spaces on-street cannot therefore be included in parking provision for the site as there appears to be no certainty that these will be available. On the basis of up to 19 predicted-persons at the site, 9 proposed parking spaces would equate to a parking provision of approximately 50%.

This level of provision is a concern to the highway authority. Even though the site is near bus stops and the aspirations of the applicant to encourage active travel are acknowledged, this level of parking provision could lead to problems either on the highway or in the servicing/parking area which may in turn result in problems on the highway. **Until the result of the updated swept-path assessment are submitted, this aspect cannot be determined**.

Linked to the above, the Design and Access Statement refers to "Adding double yellow lines along the rest of the road". It is not clear what this means, but for the avoidance of doubt the LHA would not support the modification of the existing TRO or any of the road markings.

Servicing & Delivery Management Plan:
The LHA welcomes the early submission of a Servicing and Delivery Management Plan (SDMP), requested previously as a condition. As noted above, the concern of the LHA is how large vehicles will service the site without potential road safety conflicts. The SDMP states that only vehicles up to a maximum 7m in length will be permitted to access the site. It is unclear how this would be managed, given the potential for a number of different servicing providers. If a vehicle larger than 8m arrives this would appear to be unable to turn within the site. The SDMP refers to the unlikely event of a second service vehicle arriving whilst one is unloading, with the second vehicle being directed away via a pre-agreed circuit. However, it is unclear how a second vehicle would egress the site in this scenario, as it would not be able to turn within the site area. Again, this raises concern over possible conflict with pedestrians - especially school pupils.

Conclusion

The LHA have reviewed the additional information provided by the applicant. This information either does not address previously identified requirements and/or raises further points requiring clarification.



On behalf of Chief Officer, Environment & Technical