**Minera Roof Trusses**
Units 1-3 Five Crosses Industrial Estate,
Minera,
Wrexham
LL11 3RD

Monday, 08 December 2025

**FAO:** Highways Development Control, Wrexham County Borough Council

**Re:** Planning Application – Former Tomlinson's Dairy, Five Crosses Industrial Estate, Minera

**Ref:** P/2025/0690

**Response 2 to Highways Consultation Memo (Dated 24.11.2025)**

*Dear Dafydd & P. Palmer,*

This document provides additional information and clarifications in response to the Local Highway Authority (LHA) consultation memo (Ref: ET/DC/PP/P/2025/0690 Res(2) dated 24/11/2025) for planning application P/2025/0690.

The proposed development is a change of use of the former Tomlinsons Dairies site at Five Crosses Industrial Estate, Minera, from 'Dairy Only' to a mixed B2/B8 use, involving relocation of **Minera Roof Trusses**, it's sister company **Tŷ Eco MMC** (a new timber frame company) and **Bryn Property Company** (known as WREXRENT) to this site. Below we address each of the points raised by the LHA.

**General (Building Use and Demolition Plans)**

- **Internal Demolition Only:** All planned demolition works are internal to the existing buildings. We are removing the internal first-floor areas and mezzanines, but **no** demolition of main external structures is proposed. The external fabric of the buildings will remain fully intact, preserving the site's appearance and structural footprint.

***Currently the site consists of:***

| MAIN DAIRY PROCESSING FACILITY | SQ FT | M² |
|---|---|---|
| Basement | 5,169 | 480 |
| GF Production | 40,043 | 3,720 |
| FF Production | 33,576 | 3,119 |
| Mezzanines Stores / Offices | 3,514 | 326 |
| **SUB TOTAL** | **82,302** | **7,646** |

| REAR WORKSHOP / STORES | SQ FT | M² |
|---|---|---|
| GF Workshop & Storage | 9,881 | 918 |
| | | |
| **BOTTLING PLANT** | **SQ FT** | **M²** |
| GF Production & Office | 22,793 | 2,117 |
| FF Production / Warehouse | 21,892 | 2,033 |
| Mezzanines Offices & Storage | 955 | 89 |
| **SUB TOTAL** | **45,640** | **4,240** |
| | | |
| **TOTAL** | **137,824** | **12,804** |

***Upon completion of the planned removal of the internal First & Mezzanine Floors (approximately):***

| MAIN DAIRY PROCESSING FACILITY | USE | SQ FT | M² |
|---|---|---|---|
| Basement | B8 | 5,169 | 480 |
| GF Production | B2 | 40,043 | 3,720 |
| Mezzanine Offices | Office | 3,514 | 326 |
| **SUB TOTAL** | | **45,212** | **4,526** |
| | | | |
| **REAR WORKSHOP / STORES** | | **SQ FT** | **M²** |
| GF Workshop & Storage | B2/B8 | 9,881 | 918 |
| | | | |
| **REAR PRODUCTION / WAREHOUSE UNIT** | | **SQ FT** | **M²** |
| GF Production & Office | B2/B8 | 22,793 | 2,117 |
| Mezzanines Offices | Office | 955 | 89 |
| **SUB TOTAL** | | **23,748** | **2,206** |
| | | | |
| **TOTAL** | | **78,841** | **7,650** |

- **Minimized Noise & Reuse of Materials:** Because demolition activity will occur entirely inside the buildings, noise and dust emissions will be limited to within the structures. Additionally, we plan to **reuse as much demolition material on-site as possible**. For example, concrete from the removed internal floors will be crushed and used to fill voids or serve as hardcore for levelling and resurfacing existing yard areas. This sustainable approach will reduce the need for off-site waste hauling and additional materials delivery.

- **Construction Traffic Management:** We acknowledge the Local Highway Authority's (LHA) recommendation regarding a Construction Traffic Management Plan (CTMP). We propose to address this via a **planning condition**: i.e. we will prepare and submit a detailed CTMP for approval **post-permission, but prior to commencement** of works. This approach ensures that we invest the considerable time, money and detail required for a CTMP once we have certainty the project will proceed (permission granted), rather than at this pre-decision stage. We trust this is acceptable, as it aligns with the LHA's indication that a CTMP may be included as a condition of any consent.



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**Access via Gwernygaseg Road (Rear Access)**

- **Gate Control and Restricted Use:** The existing rear access onto **Gwernygaseg Road** will remain gated and the gate will be closed outside of use. We confirm this rear access **will not be used by any heavy goods vehicles (HGVs)** or large delivery trucks – all HGV traffic will use the main A525 industrial estate entrance. The Gwernygaseg Road access is intended primarily for **staff and visitor vehicles (cars and light vans)** that may approach from the Minera village side.

- **Frequency of Use:** We do anticipate regular use of the rear access for staff and visitors, particularly for the portion of the site that was previously the dairy's bottling plant (which has pre-existing parking areas convenient to the rear gate). However, usage will mainly coincide with normal business hours (e.g. staff arrivals in the morning, departures in the evening and the occasional visitor throughout the day). We are not proposing to impose specific time-of-day restrictions on this gate's use – in order to maintain flexibility for our operations – but its use will naturally be limited to the aforementioned purposes.

- **Safety and Visibility Measures:** We acknowledge the current visibility at the Gwernygaseg Road junction is below ideal standards (splays are 2.4 x 43m to the south and 33m to the north, versus 2.4 x 120m recommended for a 40 mph road). To mitigate this, we will:

    1. Ensure **vegetation is trimmed** and maintained to maximize sightlines in both directions
        - To the South, we anticipate being able to achieve 120m visibility in this way along the existing site boundary
        - To the North, approximately 44m visibility can be achieved along the site boundary and it is noted that from this point the road falls away with vegetation/hedges being set-back from the road – potentially achieving the 120m visibility required.

    2. Install signage, visibility mirrors and markings as needed to alert drivers to the entrance and encourage caution.

  Moreover, since only cars and similar small vehicles will use this access (no OGV1/OGV2s) and given the low speeds on-site, we believe this access can operate safely for the intended limited use. The gate set 6m back from the carriageway will be used to control entry, so vehicles will stop off the highway while opening the gate, avoiding obstruction of Gwernygaseg Road.

- **Purpose of Rear Access:** In summary, the rear access will be used **only for staff/visitor convenience and emergency access**. All service and delivery traffic will be routed through the main entrance. By limiting the rear gate to light vehicles, we significantly reduce the impact on Gwernygaseg Road and address the LHA's concern about inappropriate use of that rural access. We trust this clarifies the intended use of the rear access and alleviates safety concerns, as it will *not* serve general commercial deliveries.

- We would also like to note that this access is pre-existing and has previously been used by Tomlinson's 350+ staff to access the car park in it's current state and without record of any accidents caused.


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**Visibility Splays and Speed Limit Consideration**

With regard to visibility at the Gwernygaseg Road access, we note that the current splay falls marginally below the 120m guidance typically applied to roads with a 40mph limit. However, under *Manual for Streets* guidance, the required splay for a 30mph road reduces significantly to 43m — a distance that is readily achievable at the site with routine vegetation management.

Given that this access is long-established and previously served a large car park, and considering the significantly reduced traffic levels proposed under the new B2/B8 use compared to the former 24/7 dairy operation, we would welcome the Highway Authority's consideration of a local speed limit reduction to 30mph at this location.

There is clear precedent for such changes to be implemented in response to redevelopment and we would be pleased to engage further on this, if considered appropriate?

**Parking and Turning Arrangements**

- **Provision of Parking Plan:** We are preparing a **scaled site plan** illustrating all existing and proposed parking and turning areas on site, as requested. This plan will show the layout of car parking spaces for staff and visitors, HGV loading/unloading bays, and internal circulation routes. It will also confirm that vehicles (including large HGVs) can **enter, turn, and exit the site in a forward gear** without difficulty, using the extensive yard space available.

- **Existing Hardstanding Utilized:** The former dairy site benefits from large hardstanding yards and parking areas, which will be reutilized. Previously, these areas accommodated the dairy's fleet and staff parking; going forward, they will be marked out to serve the three relocating businesses (Minera Roof Trusses, Ty Eco MMC & Bryn Property Company). There is ample room within the site boundaries to satisfy parking requirements *on-site*, so no overspill to public highways will occur. We will ensure the parking layout complies with local standards (Wrexham's parking guidelines in LPGN 16) for both **B2 (industrial)** and **B8 (storage)** uses, based on the gross floor areas of the buildings.

- **Staff Numbers and Parking Demand:** The combined workforce of the two businesses is approximately **40 staff** (e.g. around 30 from Minera Roof Trusses, 6 from Ty Eco MMC and 4 from Bryn Property Company), with potential for modest growth. These 40 staff currently require 26 car spaces at any one time, as many walk, cycle or rideshare (for various reasons).

Applying parking standards and considering shift patterns, we anticipate a **maximum parking demand** on site of roughly 40–50 spaces (to cover all staff vehicles during peak shift and some visitors). We will accommodate this by laying out 50 marked car parking spaces. In addition, we will designate a few spaces for **visitors and accessible parking** near the main building entrances. The parking plan will detail these allocations. This provision comfortably meets the likely maximum demand and there is demonstrably plenty of additional space to accommodate further/future requirements.



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It is worth noting that our requirements are considerably lower than Tomlinson's, who employed 350 staff on shifts – there were approximately 100-150 people on site at any given time, depending on shift patterns and office hours.

- **HGV Turning and Loading:** For HGVs, the site's internal roads and yards are already sized for large vehicles (the previous use saw frequent large milk tankers). We will allocate specific areas for HGV **loading bays and turning radii**. The forthcoming plan will indicate how an articulated lorry can access the main loading doors of the buildings, unload or load, and turn around to exit via the A525 entrance. Swept-path analysis (if required) can be provided to demonstrate this manoeuvrability. The **existing 7.3m+ wide estate road and junction** at the A525 are suitable for articulated vehicles and this will remain the primary access point for all large vehicles.

**HGV and Delivery Vehicle Movements**

- **HGV Traffic (Proposed Use):** The proposed mixed B2/B8 use will generate a **modest number of HGV movements**, which will be significantly fewer than those generated by the former dairy operations. Based on our operational plan, we expect on the order of **3-6 HGV deliveries/returning** (or 6-12 OGV1 total movements) per day for Ty Eco & MRT **combined** which would generally be leaving in the morning (before school drop-off) and returning in the late afternoon (after school drop-off).

    - Our current fleet consists of:
        - 3 x Rigid 4-Wheel 18 Tonne HGVs
        - 1 x Rigid 4-Wheel 12 Tonne
        - 1 x Rigid 4-Wheel 10 Tonne

    We would anticipate adding 1-2 HGVs to this fleet over the next 10 years.

    It is worth noting that Timber Frame Panels can be transported on the same vehicles and as part of the same load as Roof Trusses, so there is no direct correlation between an increase in business due to the addition of the Timber Fraem Business.

In addition to this, we take deliveries of timber and other 'raw materials' on standard 40-foot articulated lorries; typically this would average to once a week over the course of a year. All such HGVs will use the main industrial estate entrance on the A525, which is designed for heavy vehicle traffic. We will provide details of the typical size and length of these vehicles in our Transport Statement, as requested.

- **Other Delivery Vehicles:** In addition to the few HGVs, there will be smaller commercial vehicles accessing the site. This includes vans or small lorries (e.g. 7.5-ton trucks or transit vans) for delivering fittings, hardware, or for distributing smaller orders. We estimate perhaps **1-2 light goods vehicle** trips per day to the site (such as parcel couriers, post, or small supply runs). These too will use the A525 access.

- **Comparison to Former Dairy:** For context, the former Tomlinsons dairy, at peak operation, had a significant logistics component – including daily inbound milk tankers and outbound dairy product trucks. Per the Road


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traffic survey of 2014 (conducted Monday, 30th June 2014 to Sunday, 6th July 2014 – supplied as an attachment), this amounted to approximately 88 OGV1 & OGV2 movements and over 270 car & LGV movements ***per day***.

Our proposed use is **far lower in HGV, LGV & Car use intensity**. By relocating these two businesses to this site, we are in effect repurposing a facility designed for a higher volume of HGV traffic into a lighter-duty use. This means the capacity of the access road and junction will not be exceeded; in fact, the wear and traffic impact on the highway network should be less than when the dairy was fully active.

*Additionally – we are already there! Minera Roof Trusses, Ty Eco MMC & Bryn Property Company already operate from the adjacent site (Units 1-3, Five Crosses Ind. Estate) and use the same estate road to access the A525 as the Dairy. In fact, we have been doing so in some capacity for over 50 years – we actually own the lower-half of the estate road and, subject to completing the purchase of the site, we will own the top-half of the estate road which accesses the A525 too (at the request of WCBC).*

- **Access Points for Deliveries: All** HGV and routine delivery traffic will go via the main A525 entrance. The rear Gwernygaseg Road gate will **not** be used for any deliveries, ensuring that large vehicles stay on the appropriate highway network and do not attempt to traverse the narrow rural road. By concentrating any HGVs on the A525 entrance (which offers excellent visibility and junction geometry), we adhere to highway safety best practices and the LHA's expectations.

- **Daily Vehicle Movements Summary:** In total, combining staff, visitor, HGV, and other deliveries, the site might see on the order of **80–100 vehicle movements per day** (this includes, for example, 80 car/LGV movements [40 in, 40 out] and perhaps 10-15 OGV1/2 movements throughout the day). This level of traffic is notably lower than the historic traffic generation of the dairy. Detailed figures of expected daily movements through each access will be included in the Transport Statement for clarity. We are confident that the surrounding road network and site access points can comfortably accommodate these volumes given the prior use of the site.

**Cycle Parking Provision**

- **Cycle Parking Commitment:** We are committed to encouraging sustainable travel. **Adequate cycle parking and shelters will be provided** on site in accordance with local and national guidelines. Specifically, we will install **"Sheffield" type bicycle stands** in a secure, sheltered location. These stands allow bikes to be locked securely and will be covered by a roof or canopy to protect against weather, in line with Active Travel guidance.

- **Capacity and Location:** Initially, we anticipate providing **at least 4–6 cycle stands** (each accommodating two bicycles). This capacity can secure 8–12 bicycles at any time, which is expected to be sufficient given the current staff numbers – but we will monitor uptake and have space to add more stands if demand increases. The cycle parking area will be positioned conveniently (likely near the main building entrance or office area) to ensure it is attractive for use. It will be well-lit and possibly monitored by CCTV for security.


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- **Compliance with Standards:** The design and spacing of the cycle stands will follow **Wrexham's Local Planning Guidance Note 16** and Active Travel (Wales) Act standards, as noted by the LHA. A plan indicating the cycle parking location and details will be provided. By offering quality cycle facilities, we aim to support any staff or visitors who choose to cycle, thereby aligning with broader sustainability and travel plan objectives.

**Public Transport Accessibility**

- **Nearest Bus Stops:** The nearest bus stops are located at **Five Crosses**, on the A525 Ruthin Road close to the industrial estate entrance. These stops are within walking distance of the site (approximately a 5-10 minute walk from our buildings). We will include a map in the Transport Statement showing the stop locations relative to the site.

- **Bus Services and Frequency:** The Five Crosses stops are served by the **Arriva 11/11A** bus route between Wrexham and Minera. This route typically runs **hourly** during daytime hours on weekdays, providing a convenient link to Wrexham town centre (for connections to rail and other bus services) and to local villages up to Minera. In addition, a longer-distance TrawsCymru service **T51** (Rhyl–Denbigh–Wrexham) also passes along the A525 and stops at or near Five Crosses a few times a day. These services ensure that the site has at least basic public transport availability for staff or visitors. We will list the current timetable information (first/last bus, frequency) in our detailed Transport Statement to demonstrate the options available.

- **Encouraging Public Transport Use:** While many employees may still drive given the rural location, we will make new staff aware of the public transport routes serving the site. By highlighting the bus options (and providing facilities like the covered cycle parking to facilitate multi-modal travel), we aim to support any employees who prefer not to commute by car. The presence of public transport links, even if infrequent, is an important factor in reducing reliance on private cars, in line with national and local transport policy objectives.

- Additionally, it is worth noting that the vast majority (approximately 2/3) of our workforce live within 1 mile of our site – hence, many walk or cycle into work, particularly when the weather permits. This is also why only 26 of our 40 staff use their own car for work.


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**Traffic Generation Comparison (Existing vs Proposed)**

- **Former Dairy Traffic Levels:** As requested by the LHA, we have considered the **existing traffic generation of the former Tomlinsons Dairy use versus the proposed use.** The dairy, when operational, was a high-activity site with continuous inflows and outflows of vehicles. The attached Traffic Survey shows (during the period MONDAY 30th JUNE 2014 - SUNDAY 6th JULY 2014):

| A10 - TOMLINSONS DAIRY | | | | |
|---|---|---|---|---|
| CAR LGV | OGV1 | OGV2 | BUS COACH | TOTAL |
| 1909 | 240 | 373 | 0 | 2522 |
| 190.9 | 408.0 | 1119.0 | 0.0 | 1717.9 |

| A1 - MINERA ROOF TRUSSES (A1 - DMR / MINERA ROOF TRUSSES + A5 - ROOF TRUSSES REAR UNIT) | | | | |
|---|---|---|---|---|
| CAR LGV | OGV1 | OGV2 | BUS COACH | TOTAL |
| 542 | 22 | 12 | 0 | 576 |
| 54.2 | 37.4 | 36.0 | 0.0 | 127.6 |

As a comparison across the entire estate (not including Village Bakery, which has it's own access to the A525):

| AREA | PNTS | PERCENTAGE |
|---|---|---|
| A1 - DMR / MINERA ROOF TRUSSES | 38.9 | 1.8% |
| A2 - SB GROUP | 8.2 | 0.4% |
| A3 - SPARK AUTO | 9.4 | 0.4% |
| A4 - UN-NAMED UNIT (NEXT TO SPARK AUTO) | 6.0 | 0.3% |
| A5 - ROOF TRUSSES REAR UNIT | 88.7 | 4.0% |
| A6 - IES UNIT 13/14 | 10.8 | 0.5% |
| A7 - IES UNIT 5/6 | 15.1 | 0.7% |
| A8 - STAFFORD COACHES | 295.0 | 13.4% |
| A9 - ALPINE ENGINEERING | 10.0 | 0.5% |
| A10 - TOMLINSONS DAIRY | 1717.9 | 78.1% |
| | | 100.0% |

| | PNTS | PERCENTAGE |
|---|---|---|
| A1 - DMR / Minera Roof Trusses + A5 Roof Trusses Rear Unit: | 127.6 | 5.8% |

** A1 & A5 have to be added together to give Minera's Total, as there were two monitored access points onto the Estate Road being used at that time & now*

This survey, recorded in 2014 to monitor the Estate Road Usage – prior to Tomlinson's subsequent expansion – shows that their Usage of the road was approximately 13.5 x MORE than that of Minera Roof Trusses and our small construction company as it was (DMR).



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MRT wasn't even the second highest 'user' of the road at that time, with Stafford's Coaches coming in on 13.4% - more than double MRT/DMR's usage at the that time.

Although exact figures at peak operation (post-2014) are not fully documented in our submission, it is known that the dairy operated a fleet of milk tankers and delivery lorries distributing over 200 million litres of milk and other dairy products regionally. It likely generated a **considerably more HGV trips** each day than registered in this survey. This traffic all navigated via the same A525 access and, at times, the rear access for staff when the Bottling Plant & Rear Car Park came into use.

- **Proposed Development Traffic Levels:** In contrast, the **proposed mixed B2/B8 use will generate fewer total trips.** Based on our operational estimates: the three businesses (including Bryn Property Company) combined would generate roughly **80–100 total vehicle movements per day** (as mentioned earlier, including staff cars, visitor cars, delivery vans and a handful of HGVs). Importantly, the **HGV component will be much lower** than the dairy's – we anticipate maybe 8-12 HGV movements (4-6 round trips) per day for our use, versus potentially hundreds for the dairy.

- Peak hour traffic from our site is likely to be concentrated around a typical workday start/end (e.g., 8 AM and 5-6 PM) with perhaps 20–30 vehicle movements in those peak hours (mostly cars). This peak is **lower than** the dairy's peak traffic when it was operational, which would have seen shift changes and distribution schedules causing higher peaks.

- **Impact on Highway Network:** The A525 and the internal estate road were historically capable of handling the dairy traffic, and there have been **no physical changes** to reduce their capacity. By generating equal or less traffic, our development should have **no adverse impact on the local highway network.** In fact, the reduction in HGV traffic is a positive change in terms of road wear and potential highway safety (fewer large slow-moving vehicles pulling in/out).

We note that the LHA often uses the TRICS database for traffic predictions; if needed, we can provide a TRICS analysis in the Transport Statement to quantitatively support these observations. However, given that we have site-specific knowledge of both the past use and proposed operations, the qualitative conclusion is that **traffic levels will be similar to or lower than historic levels**, and thus the development should be acceptable in terms of traffic generation.

- **Distribution of Traffic Between Accesses:** Under the previous use, the majority of traffic (especially HGVs) used the main A525 access, with the rear access used occasionally by staff or as a secondary egress. We expect a similar or even more skewed pattern now – virtually **all HGV and commercial traffic on A525**, and only a portion of staff/visitor traffic using the rear gate. This means the **A525 junction remains the primary ingress/egress** for the bulk of site traffic, which it can handle as before, and the rural Gwernygaseg Road sees only light vehicular use. In effect, the **traffic distribution** will be managed to align with the road hierarchy (heavy traffic on the main road, light traffic on the minor road), which is a benefit from a highway management perspective.


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**Conclusion and Commitments**

In conclusion, we have addressed each of the Highway Authority's comments and provided the requested information or assurances above. Our key commitments can be summarized as follows:

- **CTMP:** Agree to a planning condition for a Construction Traffic Management Plan, to be submitted and approved prior to commencing works.
- **Demolition Method:** Only internal demolition will take place, minimizing impact on surroundings; materials will be reused on-site to reduce construction traffic.
- **Rear Access Use:** The Gwernygaseg Road rear access will remain gated and will **not** be used by HGVs – only by staff/visitor cars – with appropriate safety measures and maintenance of sightlines.
- **Main Access Use:** All HGVs and delivery vehicles will use the main A525 industrial estate entrance, which has adequate capacity and geometry for such use.
- **Parking & Staff Details:** We will provide a detailed parking and turning plan. Sufficient on-site parking for all staff and visitors will be provided, and current staff numbers (~35–40) and floor areas have been taken into account to ensure parking meets the required standards.
- **Cycle and Bus Facilities:** We will install sheltered cycle parking (Sheffield stands) to encourage cycling, and we have documented the proximity of bus services (Arriva 11/11A and others) to encourage public transport use.
- **Traffic Generation:** The expected traffic generation of the proposed use is on par with or lower than the former use of the site. Fewer HGVs will be on local roads compared to the dairy operation, and overall vehicle movements are within the capacity of the existing infrastructure. A comparative traffic analysis (including TRICS data if needed) will be included in the Transport Statement to substantiate this.

We trust that these measures and the information provided will satisfy the Highway Authority's requirements and ensure that the development can proceed without detriment to highway safety or efficiency.

We remain fully open to any further discussions or clarifications needed, and are prepared to accept conditions formalizing the above commitments as part of a planning approval.

Our aim is to work proactively with the Council to deliver this project in a safe and responsible manner, fully addressing all highway considerations.

Yours Sincerely,

[redacted]

**John Small**
Director
*Minera Roof Trusses Ltd*
*Tŷ Eco MMC Ltd.*



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