MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO:	Dafydd Thomas
Our Ref:	ET/DC/AC/P/2024/1675	**Your Ref:**	P/2024/1675
Date:	05/01/2026		

Town and Country Planning Act, 1990

PROPSAL: OUTLINE APPLICATION FOR INDUSTRIAL DEVELOPMENT - CLASS B1(C) - LIGHT INDUSTRIAL, B2 - GENERAL INDUSTRIAL AND/OR B8 - STORAGE OR DISTRIBUTION INCLUDING ANCILLARY OFFICE ACCOMMODATION AND ASSOCIATED INFRASTRUCTURE AND WORKS (ALL MATTERS RESERVED) / CAIS AMLINELLOL AR GYFER DATBLYGIAD DIWYDIANNOL - DOSBARTH B1(C) - DIWYDIANNOL YSGAFN, B2 - DIWYDIANNOL CYFFREDINOL A/NEU B8 - STORIO NEU DDOSBARTHU GAN GYNNWYS SWYDDFA ATEGOL A SEILWAITH A GWAITH CYSYLLTIEDIG (CEDWIR POB MATER)

LOCATION: LAND SOUTH OF DAVY WAY AND WEST OF, RACKERY LANE, LLAY, WREXHAM, LL12 0PB

Following a review of the applicant's Technical Note (TN01, dated 25 July 2025), the LHA acknowledges that the document was prepared specifically to address the issues highlighted in the LHA memorandum dated 14 May 2025.

The applicant has provided clarifications and updated assessments across the key areas of concern, as outlined below.

Development Floor Area and Extant Use
The applicant has resolved the discrepancy between the quoted floor areas by confirming that trip generation calculations are based on the Gross Internal Area (GIA) of 10,157 sqm, in accordance with the TRICS Good Practice Guide 2024. This approach is considered appropriate and aligns with industry standards. Furthermore, the applicant has clarified that the site is currently vacant and not subject to any extant permission, meaning no baseline trip deductions have been applied. This satisfies the LHA's request for clarification on these matters.

Access Design and Visibility
The applicant has revised the access proposals to include pedestrian refuge islands and visibility splays of 2.4m x 43m, in line with Manual for Streets guidance for 30mph roads. Swept path analysis for 16.5m articulated HGVs has been provided for both access options, addressing concerns about tight manoeuvres and pedestrian safety. These changes meet the LHA's requirements for safe and suitable access.

Active Travel and Sustainable Transport

The applicant has reviewed pedestrian routes to local bus stops and confirmed that continuous footways are available, subject to minor vegetation clearance. Internal footways of 2m width are proposed to link to the footways on Davy Way, ensuring connectivity for pedestrians.

Waste Management
The LHA has previously commented on the principles relating to waste management for this development. While some indicative details were provided within the Design and Access Statement, these were not sufficient to confirm compliance with operational requirements. The LHA expects that a clear and robust waste management strategy will be developed to ensure safe and efficient collection arrangements that do not compromise highway safety or internal circulation.

Given that the application is at outline stage, the LHA is satisfied that this matter can be addressed at the reserved matters stage. At that point, the applicant should provide detailed proposals for waste storage, collection points, and vehicle access arrangements, supported by swept path analysis where necessary.

Parking Provision
The LHA has previously set out the principles for car and cycle parking provision in accordance with LPGN16. This includes ensuring that the quantum of spaces reflects the final mix of employment uses, that accessible spaces account for at least 10% of provision, and that dimensions and layout comply with the standards set out in LPGN16. The LHA also highlighted the need to consider electric vehicle charging facilities and provision for motorcycles.

As the application is currently at outline stage, the LHA is content for these matters to be addressed at the reserved matters stage. This will require the applicant to submit a detailed parking layout that demonstrates compliance with adopted standards.

Pedestrian Crossing Improvements at Rackery Lane / Chapel Lane / B5102 / Gresford Road Junction
The LHA previously requested that the applicant consider a scheme to improve pedestrian facilities at the Rackery Lane / Chapel Lane / B5102 / Gresford Road signal-controlled junction. This request was made in recognition of the potential for staff and visitors to access nearby amenities, including the Aldi store, on foot. The applicant's technical note states that infrastructure improvements should be directly related to the development and proportionate in scale and kind. It further argues that, given the forecast of only around six pedestrian movements during each peak hour, the provision of a signalised pedestrian phase would be disproportionate to the development's actual impact and has therefore not been considered.

While this position appears inconsistent with the earlier Transport Assessment, which concluded that the site is well placed to encourage trips on foot, the LHA acknowledges the practical constraints of achieving pedestrian improvements at this junction. Delivering a suitable pedestrian improvement scheme would require significant alterations to the existing signal phasing and may introduce an all-red stage, which could adversely affect junction capacity at this sensitive location. In light of these constraints, and given the relatively low level of pedestrian demand forecast, the LHA does not intend to pursue a requirement for pedestrian improvements at this junction as part of this application.

Trip Generation and TRICS Methodology
The LHA requested a review of the trip generation methodology presented in the original TA. In response, the applicant has undertaken an update to address the comments raised by the LHA. This review addresses concerns regarding the age and relevance of survey data, land use categorisation, and the need for a robust worst-case scenario assessment.

The updated TRICS assessment has removed sites older than eight years and excludes sites located in Ireland and Northern Ireland. Surveys undertaken during the COVID-19 pandemic have also been omitted due to atypical travel patterns. The applicant has presented the results of three different TRICS assessments:

- Scenario 1: Flexible Multi-Unit Scheme (Industrial Estate) - Forecasts approximately 85 two-way vehicle trips during the AM peak hour and 84 two-way vehicle trips during the PM peak hour.

- Scenario 2: Higher B1C/B2 Proportion - Produces only a marginal increase in trip rates compared to Scenario 1, with 89 and 87 two-way vehicle movements in the AM and PM peak hours respectively.

- Scenario 3: 100% B8 Warehousing - Results in significantly lower overall trip generation (29 two-way movements in the AM peak hour and 26 in the PM peak hour).

The applicant has utilised the trip rates derived from Scenario 1 for their junction capacity assessment. The LHA agrees with this approach in this instance, given the site's specific characteristics and its location within an existing industrial estate.

Multi-Modal Assessment
In response to the LHA's request for a person-trip analysis, the applicant has provided multi-modal trip generation estimates, including pedestrian, cyclist, and public transport trips.

Traffic Modelling and Junction Capacity
The applicant has clarified that both network peak hours and development peak hours have been considered in the modelling. This resolves the earlier concern that the TA relied on non-standard peak periods (e.g., 16:00–17:00). The updated methodology now aligns with best practice and ensures that the impact during critical network peaks has been captured.

Updated modelling has been undertaken using Junctions 9 (PICADY) for the site access and LinSig v3 for the signalised Rackery Lane/Gresford Road junction. The results indicate that the proposed site access will operate well within capacity in the 2029 Base + Development scenario. While the Rackery Lane signalised junction shows a degree of saturation approaching 97.5% in the AM peak, the applicant has demonstrated that the overall impact of development traffic is less than 5% on Practical Reserve Capacity (PRC), with all arms operating below theoretical capacity. The applicant also notes that MOVA control, which is already in place, would further improve performance, although this cannot be explicitly modelled within LinSig software. This provides reassurance that the development will not have a significant impact on the local highway network. The LHA has reviewed the junction modelling outputs and consider these acceptable.

Travel Plan
The applicant confirms that the submitted Travel Plan is a framework document and commits to preparing a full Travel Plan post-occupation, incorporating specific measures and incentives tailored to occupiers. While this does not fully resolve the LHA's concerns at outline stage, it is considered acceptable subject to a planning condition.

Conclusion
The applicant has addressed the majority of concerns previously raised by the LHA, particularly those relating to trip generation methodology, peak hour assessment, traffic modelling, and access design. However, certain matters, including internal swept paths, parking strategy, and waste management arrangements, will need to be resolved at the reserved matters stage and secured through appropriate planning conditions.

Accordingly, the LHA is satisfied that the applicant has responded adequately to the issues identified and raises no objection to the proposals, subject to the imposition of standard planning conditions.

Supplementary Notes

The applicant's attention should be drawn to item nos. 1, 2, 3, 4 & 5 of the supplementary notes.

KWEdwards

Contracts & Engineering Manager
On Behalf of Chief Officer, Environment & Technical

Appendix

Highways Development Control Standard Advisory Note

In the interests of maintaining highway safety, and to avoid obstruction of the public highway (in contravention of the Highways Act), The Applicant is advised to coordinate with the highway authority at highwayroadworks@wrexham.gov.uk in advance of commencement of the development/works with respect to:

1. Skip, scaffolding, hoarding or A frame/signage (Permit required for these items, if on the public highway);
2. Use of a parking space for a set down/delivery area;
3. Record a dilapidation survey of the adjacent carriageway prior to commencement (to avoid being ask to repair damage by the Applicant whilst carrying out their works);
4. If any lane closure or obstruction of the highway is required for a crane or similar;
5. Protection against dust and debris blowing onto the public highway
6. Construction traffic parking locally avoiding nuisance to others;
7. If the Applicant's scope of work includes new apparatus in the highway, such as new mains services then a Section 50 licence will be required. *Insurances and demonstration of competency to carry out works in the public highway will be required.*
8. Lowering of kerbs or minor pavement alterations require Section 184 agreement. *Insurances and demonstration of competency to carry out works in the public highway will be required.*
9. A section 278 agreement works agreement is required for more significant alterations to the existing highway
10. Any temporary works affecting traffic lights, [pedestrian/cycle road crossings, or bus stops require pre-planning and permits;
11. For applications with a private driveway (either existing or proposed) connecting onto the public highway, the following conditions of approval apply:

    - No surface water from the applicants site should be allowed to drain onto the public highway,
    - The first 5m* minimum (for residential property) should be hard paved, avoiding gravel or loose chippings form spreading.
    - No gate should be built in a location where it would result in a car obstructing the highway whilst being unlocked, and it should not swing out and over a pavement or any other part of the highway.

    *The hard paved length and set back if required is subject to the applicants proposed vehicular length

The applicants should allow a minimum of 4 weeks' notice for any of the above standard requirements, and 6-8 weeks for lane closures & road closures (lead times may change without notice subject to workload and complexity). Any works involving Trunk roads should be coordinated separately and directly with the North & Mid Wales trunk Road Agency. For larger sites with a significant impact upon the highway, a Construction Traffic Management Plan will be required.