MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO::	Dafydd Thomas
Our Ref:	ET/DC/AC/P/2025/0690	**Your Ref:**	P/2025/0690
Date:	12/01/2026		

TOWN AND COUNTRY PLANNING ACT 1990

CHANGE OF USE OF BUILDING FROM 'DAIRY ONLY' TO MIXED USE CLASS B2 (GENERAL INDUSTRIAL) AND B8 (STORAGE AND DISTRIBUTION) / NEWID DEFNYDD ADEILAD O 'LAETHFA YN UNIG' I DDEFNYDD CYMYSG DOSBARTH B2 (DIWYDIANNOL CYFFREDINOL) A B8 (STORIO A DOSBARTHU)

TOMLINSONS DAIRY, FIVE CROSSES INDUSTRIAL ESTATE, MINERA, WREXHAM, LL11 3RD

In reference to the above application.

The Local Highway Authority (LHA) has reviewed the additional information submitted by the applicant as requested in the LHA's consultation response dated 24th November 2025.

General
The LHA requested clarification on whether the existing buildings would be demolished or modified and recommended that a Construction Traffic Management Plan (CTMP) be secured as a condition of approval. This was to ensure that any works, particularly demolition, would not adversely impact highway safety or generate uncontrolled construction traffic.

In response, the applicant confirmed that all demolition works will be internal only, involving removal of mezzanine and first-floor areas, with no external structural changes. They also committed to reusing demolition material on-site to minimize vehicle movements and agreed to submit a detailed CTMP prior to commencement of works, secured by planning condition. The amended site layout plan supports this by showing the internal demolition zone and retaining the existing building footprints, which aligns with the applicant's statement. On this basis, the issue is considered addressed.

Access onto Gwernygaseg Road
The LHA highlighted that visibility splays at the Gwernygaseg Road access are currently below the required standard for a 40 mph road (2.4 m x 43 m to the south and 2.4 m x 33 m to the north, versus the 2.4 m x 120 m requirement). They requested clarification on the intended use of this access, including vehicle types and anticipated movements.

The applicant has confirmed that the rear access will remain gated and restricted to staff and visitor cars and light vans, with no HGVs permitted. They propose trimming vegetation to improve visibility and installing signage and mirrors as additional safety measures. The applicant also suggests that reducing the posted speed limit to 30 mph could be considered, which would make the existing

splays compliant under Manual for Streets guidance; however, enforcing a 30 mph limit may be difficult given the rural nature of the route and typical speed-limit policies for such roads. The amended site layout plan reflects this by labelling the Gwernygaseg Road access for “cars & light goods vehicles only” and segregating it from HGV routes.

The LHA notes that the verges appear to fall within the extent of the adopted highway, making it highly probable that the required visibility can be achieved. To ensure compliance, the LHA requests that the applicant cuts back existing vegetation to deliver the necessary sightlines. Furthermore, the LHA recognises that the site has an established use and that this access was previously used by the former dairy operation, which supports its continued use for light vehicles. On this basis the LHA do not object the use of this access providing the existing vegetation is cut back accordingly.

Parking & Turning Provision

The LHA requested detailed information on existing and proposed parking arrangements, turning areas, staff numbers, and gross floor areas to assess compliance with Wrexham’s Local Planning Guidance Note 16 (LPGN 16). They also sought confirmation that HGVs can enter and exit in forward gear and that swept-path analysis would be provided if required

The applicant responded by:

- Providing a breakdown of floor areas and confirming current staffing levels of approximately 40 employees, rising to 60 over time.
- Proposing 50 marked car spaces initially, with additional capacity available on extensive hardstanding areas if demand increases.
- Confirming that HGV turning and loading areas will be shown on a scaled plan and that swept-path analysis can be provided if required.

The amended site layout plan supports this by showing:

- Designated car parking areas.
    - 26 spaces locate on the existing parking area shown by the pink area on the plan.
    - 50 spaces located on the hard standing area shown by the blue area on the plan.
    - 100 spaces shown by the green area on the plan.
- A dedicated HGV turning head (20 m x 20 m).
- Loading/unloading zones adjacent to the main warehouse.
- Existing hardstanding areas identified for future marking.

Under LPGN 16, the maximum car parking standards are:

- B1 (Office): 1 space per 30 m² GFA.
- B2 (General Industry): 1 space per 50 m² GFA.
- B8 (Storage/Distribution): 1 space per 100 m² GFA.

Based on the applicant’s post-demolition GFAs (approx. **7,650 m² total**), the calculated maximum provision is:

- Scenario A (mixed floorspace treated as B2): ~154 spaces.
- Scenario B (mixed floorspace treated as B8): ~123 spaces.

LPGN 16 does allow some flexibility where evidence demonstrates lower demand, provided overspill onto the public highway is avoided.

The proposed 50 marked spaces is significantly below the maximum standard, but the LHA recognise that there is significant space and hard standing areas onsite to support more parking if required. Therefore in this instance, the LHA are willing to accept a reduction of marked parking bays providing the other hardstanding areas are retained for overflow parking. In addition the projected staff numbers are modest (40–60 employees) with the former dairy having generated higher traffic volumes.

The LHA requests that a full Travel Plan and a Car Parking Management Plan be secured by the relevant planning condition to ensure adequate parking onsite is maintained.

Cycle Parking / Shelters
The LHA requires cycle parking to comply with Wrexham's Local Planning Guidance Note 16 and Active Travel standards, and in this case requires a minimum of 14 cycle spaces to be provided. Based on the site's gross floor areas of approximately 415 m² of office space, 3,720 m² of B2 production, and 3,515 m² of B8 storage. The proposals on site need to align with this minimum. Accordingly, the site should install seven Sheffield stands (two spaces per stand) in a covered, secure, well-lit location near main staff entrances. The applicant is currently proposing only 4–6 stands (8–12 spaces), which represents a shortfall against the LHA's minimum requirement and offers limited headroom for future demand. **A planning condition should therefore secure provision of at least 14 spaces (seven stands), alongside a Detailed Travel Plan and a Car Parking Management Plan to support sustainable travel and manage on-site parking effectively.**

Public Transport
The LHA requested details of the nearest bus stops serving the site, along with information on service frequency and destinations. This was to ensure that staff and visitors have access to sustainable transport options and to assess compliance with local transport planning guidance.

In response, the applicant identified bus stops located at Five Crosses on the A525, which are served by the Arriva 11/11A route operating on an hourly basis during daytime hours. They also noted that the TrawsCymru T51 service provides a limited number of longer-distance connections along the same corridor. The applicant highlighted that most staff live locally and either walk or cycle to work, reducing reliance on private car use.

The amended site layout plan does not show public transport details, but this information has been provided in the written response. The LHA therefore consider this issue to have been addressed.

Traffic Generation
The applicant has compared the proposed B2/B8 use with the former Tomlinsons Dairy operation using a combination of historic site survey data and operational estimates. At a high level, the former dairy generated substantially more traffic particularly HGV movements than the new use now proposed. The proposed development concentrates all HGV movements at the A525 estate access (with the rear Gwernygaseg Road access limited to staff/visitors only).

Extant Site Use
To establish a realistic "fallback" comparator, the applicant provided a week-long traffic survey undertaken between Monday 30th June 2014 and Sunday 6th July 2014 on the estate both in PDF and Microsoft Excel format. That dataset indicates the dairy's traffic profile when operational including 88 HGV movements per day and 273 car/LGV movements per day. Using a site-specific historic baseline avoids over or under-estimating traffic and reflects the actual operating conditions of the site's former use.

Operational forecasting for the proposed use
For the B2/B8 proposals, the applicant has utilised a first principals approach using bottom-up estimates derived from:
- Current and projected staff numbers and shift patterns.
- The existing in-house HGV fleet (rigid vehicles) and occasional articulated deliveries for raw materials.
- Typical dispatch schedules for trusses/timber frames; and

This produces an order-of-magnitude daily forecast of around 80–100 total trips, with 8–12 HGV trips (two-way). It should be noted that the LHA had requested that a TRICS assessment be undertaken

Trip Generation Comparison
A comparison between the previous and proposed B2/B8 uses onsite are shown in the table below.

Use / Source	Cars & LGVs (two-way / day)	HGVs (two-way / day)	Total (two-way / day)
Previous use (Dairy) – Historic site survey (2014)	273	88	350
*Proposed use (B2/B8) – Applicant estimate	70–90	8–12	80–100

* estimated provided by the applicant.

The applicant has demonstrated using appropriate evidence that the proposals will generate a substantially lower level of traffic than the extant dairy use, both in terms of overall vehicle movements and HGV trips. The former dairy generated over 350 daily movements, including 88 HGV trips, whereas the proposed use is forecast at approximately 80–100 movements per day, with only 8–12 HGV trips. This represents a significant reduction in traffic impact on the local highway network.

Accordingly, the LHA considers the proposed access and traffic generation acceptable in this instance.

Summary
The Local Highway Authority (LHA) has reviewed the additional information provided by the applicant and considers the proposals acceptable, subject to specific conditions. The applicant has demonstrated that the proposed B2/B8 use will generate a substantially lower level of traffic than the extant dairy use, with all HGV movements routed via the A525 estate access and the rear Gwernygaseg Road access restricted to staff and visitors only. Parking and turning arrangements are shown on the amended site layout plan, and sufficient hardstanding exists to accommodate overflow parking if required.

To ensure highway safety and sustainable travel, the LHA requires the following to be secured by planning condition:

- **Vegetation adjacent to the access on Gwernygaseg Road be cut back to ensure the appropriate visibility (2.4mX120m) can be achieved.**
- **A Construction Traffic Management Plan (CTMP) prior to commencement of works.**
- **A Detailed Travel Plan promoting sustainable modes and setting out monitoring arrangements.**
- **A Car Parking Management Plan to manage allocation and prevent overspill onto the highway.**
- **Provision of appropriate cycle parking, specifically a minimum of 14 spaces (seven Sheffield stands) in a covered, secure location, as detailed in this response.**

Subject to these measures being implemented, the LHA raises no objection to the proposed development.

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.