MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO:	Minerals Officer
Our Ref:	ET/DC/PP/P/2026/0006 Res(2)	**Your Ref:**	P/2026/0006
Date:	04/03/2026		

TOWN AND COUNTRY PLANNING ACT 1990

PROPOSAL: NEWID DEFNYDD O DOSBARTH B8 (STORFA A DOSBARTHU)) I SUI GENERIS (CYFLEUSTER AILGYLCHU GWASTRAFF) / CHANGE OF USE FROM CLASS B8 (STORAGE AND DISTRIBUTION) TO SUI GENERIS (WASTE RECYCLING FACILITY)

LOCATION: UNIT 1, REDWITHER COMPLEX, FIRST AVENUE, WREXHAM INDUSTRIAL ESTATE, WREXHAM, LL13 9XP

I refer to your consultation / email dated 02/03/2026 and Supplementary Highways Statement in respect of the above.

General

The site is located on the Redwither Business Park. The existing site comprises the former McCarthy Distribution Business operating as a warehouse/ distribution centre. Telecycle Ltd wish to apply to use the site for storage and shredding of waste electrical and electronic equipment for onward dispatch to domestic and international markets for recycling

The site is located on an unadopted road and it is understood that the associated roads on the business park are managed / maintained by the WCBC – Assets Section. **The LHA therefore recommend that the WCBC Planning Department consult with the above department to discuss the suitability of the proposed development.**

The submitted Highway statement indicates that a previous pre-application enquiry (ref: ENQ/2025/0102) was submitted to the Planning Department earlier in the year for which the Highway Authority failed to respond. However, the LHA did respond to this enquiry via WCBC Planning Department on the 03/07/2025.

Access

The site is located on the Redwither Business Park which is subject to a 30mph speed limit. However, typical speeds are likely to be around 25mph along both Dutton Road and First Avenue in

this location given the geometry of the road. The site is accessed via First Avenue and Dutton Road which are both undaopted roads managed by the WCBC Assets Section.

Based on typical speeds of 25mph, any proposed / existing access would require visibility splays of 2.4 x 33m in both directions measured to the nearside edge.

There would appear to be 3 no. existing access points serving the development site, 1 no. off Dutton Road and 2 no. off First Avenue.

Access - off First Avenue (south eastern edge of site)

Visibility from this access is adequate providing splays in excess of 2.4 x 43m in both directions measured to the nearside edge.

This access is approximately 6m wide, surfaced with hard bound materials and runs alongside the eastern edge of the site. No details of the existing visibility splays from this access have been provided. The LHA understand that this access is gated at its northerly end and it will only be used for emergency purposes only.

Access – off First Avenue - Gate A (south side of site)

This access is approximately 9.1m wide reducing to 6.1m at approximately 20m behind the edge of carriageway. The access is gated at this point. The access is surfaced with hard bound materials. This access currently appears to function as the main access (in only). The submitted Supplementary Highways Statement indicates that this access will continue to operate as an "in only" access for the proposed development with appropriate signage.

Access – off Dutton Road - (western side of site)

Visibility from this access is adequate providing splays in excess of 2.4 x 33m in both directions measured to the nearside edge.

This access is approximately 6.5m wide and is gated at approximately 6.2m behind the edge of carriageway. The access is surfaced with hard bound materials. This access currently appears to function as the main exit (out only). The submitted Supplementary Highways Statement indicates that this access will continue to operate as an "out only" access for the proposed development with appropriate signage.

Operation of the Site

The submitted Supplementary Highways Statement indicates the following:-

The site will operate on a secure basis with no public access. Vehicle entry to the site will be controlled and restricted to the gateway off First Avenue; that currently signed as Gate A. The roller-shutter door adjacent to this gateway has been permanently closed; access blocked by internal barriers. All vehicles will exit the yard area by the existing exit onto Dutton Road. Operation of yard access and egress points are unchanged from the existing operation; signage will generally remain the same as existing. Apart from the change to company name boards, it is proposed to add an additional "no-entry" sign, similar to Traffic Signs Manual diag 616, affixed to the boundary fence next to the Dutton Road egress.

All delivery and collection vehicles will arrive on site at a pre-scheduled time, the goods will be un-loaded/loaded and leave immediately. The yard area is of sufficient size to accommodate simultaneous loading and off-loading. Materials delivered to site will be off-loaded within the yard area with recovered material leaving the site stored and loaded within the canopied area. There will be no vehicles remaining on site overnight and no requirement for HGV parking provision

Parking & Turning Provision

Parking provision shall be provided in accordance with LPGN 16 requirements. However, it is understood that the proposed development comes under a sui generis use within LPGN 16. It is therefore difficult to determine the precise level of parking provision required for such a development.

The submitted Highway Statement indicates that the existing McCarthy business employs 26 drivers on site along with 10 warehouse/office staff (total 36 employees) who all park off-site in the nearby council operated car park. The Highways Statement indicates that the proposed business will employ 10 warehouse / yard staff and 2 managers (total of 12 employees).

The submitted Highway Statement indicates that there are 3 separate existing car parks located on the business park. However, it is not clear exactly which car park is currently utilized by existing McCarthy staff or what number of designated spaces are available for the existing / proposed business. **Clarification on this detail should be provided (including plan) and confirmation as to whether this arrangement is acceptable in Planning terms ie/ adequate off-street parking can be provided in perpetuity for the proposed business. It is noted that.** It is noted that there is a significant amount of existing on-street parking along Second Avenue.

It is understood that the applicant has contacted the WCBC Assets Section to ascertain the permitted parking provision afforded to Unit 1 along with the number of allocated spaces**.**

No details of the existing / proposed parking arrangements at the site have been provided. **The LHA previously recommended that a suitably scaled layout plan is provided that details the existing / proposed parking spaces for both cars (visitors / staff) and HGVs (including annotated dimensions).** It is noted that there are significantly less staff proposed for this site compared with the previous business.

No details of the existing / proposed turning arrangements at the site have been provided. **The LHA previously recommended that that a suitably scaled layout plan is provided that details the existing / proposed turning provision for the existing / proposed type / length of vehicles including HGVs likely to visit the site (including annotated dimensions).** However, **the submitted** Supplementary Highways Statement indicates that deliveries will be by articulated HGVs or smaller and will generate approximately 20 deliveries per week ie/ approximately 4 visits per working day which will be co-ordinated. The existing yard / parking area appears to provide at least 10 no. articulated HGV spaces with space for turning on the yard and within an existing covered loading area. On this basis, the existing / proposed HGV parking & turning area would appear adequate.

Existing / Proposed Cycle Parking / Shelters

Active Travel

The LHA recommend that the applicant liaises with our Strategic Transport Manager – Gwen Thomas on Tel: 01978 729667 (or email: gwen.thomas@wrexham.gov.uk) for advice in respect of any specific requirements for the proposed development that may be required under the Active Travel Act Guidance / LPGN 16. Any such requirements should be referenced / indicated on a revised layout.

A detailed plan indicating the proposed cycle parking / shelter provision at the site will need to be provided. The submitted Supplementary Highways Statement only includes a photograph of a cycle shelter with Sheffield stands

Travel Plan

The submitted Highway Statement indicates that a Staff Travel Plan will be produced prior to operation of the site. **It would be considered reasonable that any consent includes a condition for the submission of a Travel Plan.**

Traffic Generation

The submitted Highway Statement indicates the following:-

4 Generated Traffic Comparison

4.1.1 McCarthy Haulage have 26 vehicles based on site running both national and local routes. A minimum of 10 lorries operate on a local basis and make an average of 3 trips per day. Total vehicular movements are in the order of 160 per week.

If there are 26 vehicles in total and all vehicles (worse case) generated 6 movements per day, then this would generate approximately 160 movements per day (not per week as indicated). **This detail requires clarification.**

4.1.2 McCarthy employ 26 drivers on site along with 10 warehouse/office, a total of 36 employees all of whom park off-site in the nearby council operated car park.

4.2.1 It is anticipated that the proposed change of use will deal with 6,000 to 10,000 tonnes per year and will require access by articulated lorries (loading and unloading), 20ft/40ft containers (loading), tipper trucks (unloading) and cargo vans (unloading) resulting in a total traffic generation of less than 80 trips per week.

The submitted Supplementary Highways Statement indicates that there will be around 20 deliveries per week equating to approximately 4 deliveries per day which is relatively low.

4.2.2 The new facility will employ 10 warehouse/yard staff along with 2 managers; a total of 12 employees.

4.3 The proposed change of use will result in a reduction in the number of HGV movements to and from the site and a reduction in the number of employees based on site.

To be confirmed. However, even with 10 of the 26 McCarthy HGVs generating at least 30 trips per day, the proposed 4 deliveries per day generated by the proposed development is significantly less.

Conclusion

Providing adequate off-street parking can be provided within the Redwither Complex car park(s) in perpetuity for the proposed development, the LHA would have no objections to the proposed development on highway grounds.

Given that the proposed development is likely to generate significantly less daily vehicle movements than the previous distribution business, the LHA would have no objections to the proposed development on highway grounds.

As indicated above, the site is located on an unadopted road and it is understood that the associated roads on the business park are managed / maintained by the WCBC – Assets Section. **The LHA therefore recommend that the WCBC Planning Department consult with the above department to discuss / agree the suitability of the proposed development and request the WCBC – Assets Section provide recommendations for any suitable planning conditions they consider appropriate.**

Supplementary Notes

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

KW Edwards
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 / 171 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 applicant's 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.