

TeleCycle Europe Ltd, Unit 1, Redwither Business Park
First Avenue, Wrexham, LL13 9XP

Supplementary Highway Statement

Revision A

Colin Simpson CEng. MICE. MCIHT.BTech.
Highway Planning Services
Whitchurch Road
Chester
CH3 5QB
07789 851232
highwayplanningsolutions@btinternet.com

TeleCycle Europe Ltd
Unit 1 Redwither Business Park
First Avenue
Wrexham
LL13 9XP

Supplementary Highway Statement

Revision	Prepared By	Purpose	Date
A	Colin Simpson BTech CEng MCIHT	To reflect proposed changes in car parking provision.	12 March 2026

1 Project Brief

The Highway Authority have raised a number of questions in response to consultation on Planning Application P2006/0006; this report has been prepared in an attempt to provide answers to those questions. A copy of the highway response to the application is included as appendix to this report.

2 Traffic Generation/management

TeleCycle Europe Ltd, the applicants and future operators of the former McCarthy site are a specialist, hi-tech, processing and recycling company that are heavily controlled by environmental protection regulations. The transfer of all materials onto and off the site is covered by business to business arrangements; there will strictly be no public access. The delivery of material to the site will be rigidly controlled with each delivery given a predetermined time slot. No more than 6-8 material deliveries can be accommodated on a daily basis.

The majority of materials delivered to site will be bagged or palletized and arrive on curtain-sided articulated trailers to be off-loaded by fork lift; some metals will arrive un-bagged. All re-claimed materials leaving site will be bagged. The following photos show the typical delivery truck to be unloaded and bags of reclaimed materials being loaded to go off-site.







The highway report submitted with the application made reference to delivery of 6,000-10,000 Tonnes of material per year. The majority of deliveries will fall within the 10-20Tonne range although some will be lighter. Assuming 10T per average load would equate to a maximum of 1000 annual deliveries, 20 deliveries per week (assuming a 50 week year) or 4 per working day.

Working to a strict time schedule will ensure that all delivery and collection vehicles will always be accommodated on site and that there will be no waiting/hold over within the highway.

3 Operation of the site

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, they will be un-loaded/loaded and leave immediately. The yard area is of sufficient size to

accommodate simultaneaous 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.

4 Junction visibility splays

The layout of existing accesses will remain unchanged; only one access will be used as exit from the yard onto the highway; the road alongside the eastern boundary of the site will be used for car parking. As requested, visibility splays at all access points have been measured and plotted.

All roads within the vicinity of the Business Park are subject to a 30mph speed restriction although, as accepted by the highway officer, traffic speeds on a number of roads will be lower than this. TAN18 table B suggests minimum visibility splays in the order of 43m (45m in total to accommodate a 2.4m bonnet length) for a traffic approach speed of 31mph.

Dutton Road is a cul-de-sac road with locked gates located approximately 25m to the right of exit from the site. Full visibility is available from the site exit to the end of the road. To the left on exit, visibility in the order of 2.4x250m is available.



2.4x250m visibility left



2.4x25m visibilty right
(to the end of the road)

Dutton Lane southbound is marked as a give-way junction; through traffic moves between Dutton Road and First Avenue. The critical visibility splay for Gate A and the adjacent access is therefore taken to the inside of the bend on the junction. Visibility from Gate A was measured to be 2.4x43m to the right and 2.4x250m to the left.





2.4x250m visibility left

2.4x43m visibilty right
(to the inside of the bend)

Visibility splays from the nearby roller shutter access were similar to the above and measured to be 2.4x52m to the right and 2.4x240m to the left; this area will be used for car parking and provide ev charging points.





2.4x240m visibility left

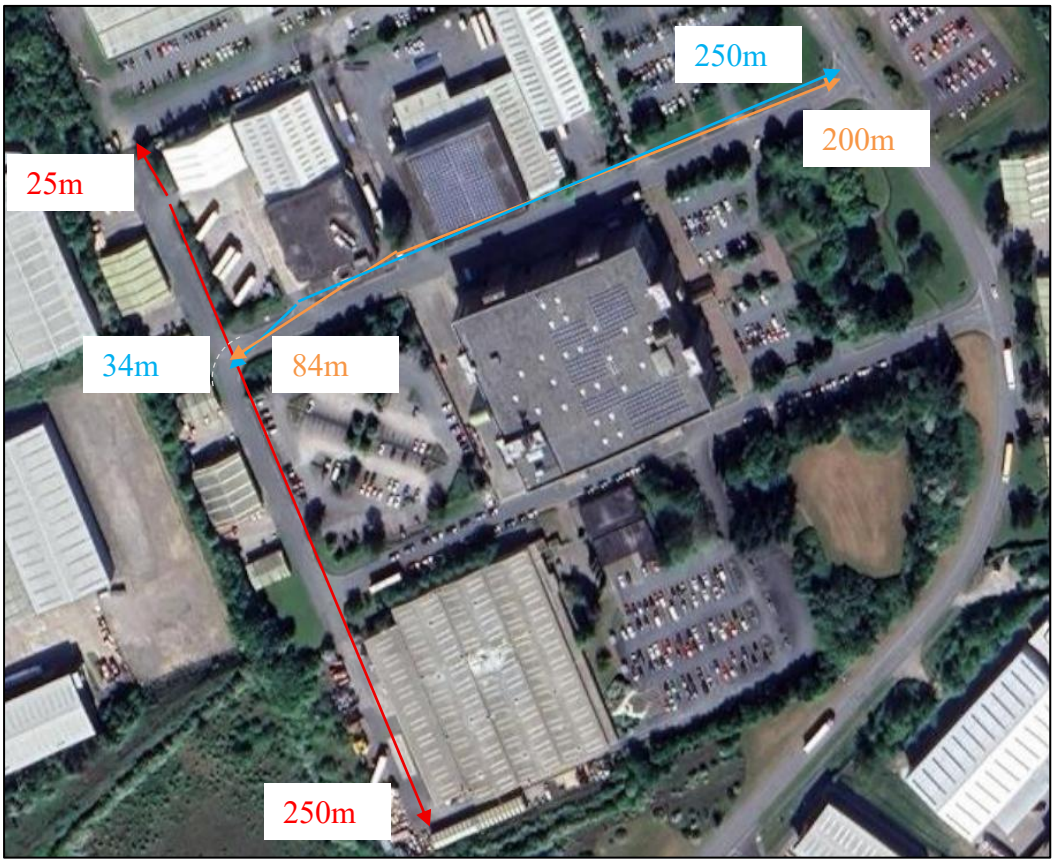
2.4x52m visibilty right
(to the inside of the bend)

Although a through road, the access along the eastern side of the building is gated at its northern end. The gate is kept closed by the company and there is an agreement

that it remains closed. This road will be used to provide car parking (please refer to separate Car Park report). Visibility splays of 2.4x84m to the right and 2.4x200m to the left are available.

Eastern road to provide car parking and cycle storage facilities





All visibility splays are deemed appropriate to suit the speed restriction or the speed of approaching traffic.

5 Car Parking Provision

Please refer to separate Car Park report for full details. Four existing car parking spaces are accessed direct from First Avenue with two additional spaces, to be provided with EV charging facilities, to be provided in front of the nearby roller shutter doors. Up to ten further spaces are available along the eastern access road. Available on-site car park provision will exceed the estimated demand generated by the 2 managers and 10 warehouse/process staff.

6 Cycle Storage

On-site cycle storage can be provided in accord with the WCBC Local planning guidance Note 15; general industrial uses require provision at a rate of 1 per 500m^2 gfa. The warehouse has a size of 75x35 a gfa of 2625m2 requiring storage provision for 5.25 cycles. A cycle storage shelter similar to the following with provision for at least 6 cycles will be located beneath a CCTV camera, close to the pedestrian entrance on the eastern side of the warehouse.





Proposed location of cycle storage unit

7 Conclusions

- This is an existing site with a proposed change of use that will be less onerous in terms of traffic generation and highway impact than the existing use.

- The layout of access/egress points remain unchanged; the layout and visibility splays of all accesses is deemed appropriate.

- Vehicular access to the yard will be tightly controlled; the site has adequate capacity to cater for the loading/off-loading and maneuvering of delivery vehicles.

- Appropriate car park and cycle storage provision will be provided.

It is believed that all concerns expressed by the highway officer have been satisfactorily addressed.

Appendices

MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO:	Minerals Officer
Our Ref:	ET/DC/PP/P/2026/0006	**Your Ref:**	P/2026/0006
Date:	23/02/2026		

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 15/01/2026 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 lower than 30mph 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.

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)

This access is approximately 6m wide and runs alongside the eastern edge of the site. No details of the existing visibility splays from this access have been provided. **The LHA recommend that this detail is indicated on a suitably scaled layout plan (including annotated dimensions of the access).**

No details of the existing / proposed use of this access have been provided. **The LHA recommend that this detail is provided along with existing / proposed daily vehicle movements and type / length of vehicle using the access.**

The access is surfaced with hard bound materials.

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. This access appears to function as the main access (in only). No details of the existing visibility splays from this access have been provided. **The LHA recommend that the applicant provides a suitably scaled plan indicating if this access is to continue as an "in only" access (for which appropriate signage will need to provided) or whether it is also to be used as an exit. If access is to be used for both entry and exit then proposed visibility splays will need to be provided on a suitably scaled plan (including annotated dimensions of the access).**

The access is surfaced with hard bound materials.

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

This access is approximately 6.5m wide and is gated at approximately 6.2m behind the edge of carriageway. This access appears to function as the main exit (out only). No details of the existing visibility splays from this access have been provided. **The LHA recommend that this detail is indicated on a suitably scaled layout plan (including annotated dimensions of the access).**

If this access is to continue as an "exit only", then appropriate signage will need to indicated on a revised layout plan indicating this detail.

The access is surfaced with hard bound materials.

The LHA recommend that the applicant provides details of how the access arrangements will function when the proposed development is in operation.

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).

It is not clear where exactly this car park is located or what number of designated spaces are available for the existing / proposed business. **The LHA request that this detail is provided (including plan) and clarification whether this arrangement is acceptable in Planning terms. It is noted that.** It is noted that there is a significant amount of existing on-street parking along Second Avenue.

No details of the existing / proposed parking arrangements at the site have been provided. **The LHA recommend that 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).**

No details of the existing / proposed turning arrangements at the site have been provided. **The LHA recommend 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).** Appropriate swept path details will need to be provided of the various types / size of vehicle visiting the site detailing how they will access, park, turn and exit the site.

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.

Travel Plan

The submitted Highway Statement indicates that a Staff Travel Plan will be produced prior to operation of the site. **The LHA recommend 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). **The LHA request 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 LHA request clarification if the above equates to 160 movements per week or is it per day.

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

Conclusion

In conclusion, the LHA request the following additional information:-

- **Access**

  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)

  This access is approximately 6m wide and runs alongside the eastern edge of the site. No details of the existing visibility splays from this access have been provided. **The LHA recommend that this detail is indicated on a suitably scaled layout plan (including annotated dimensions of the access).**

  No details of the existing / proposed use of this access have been provided. **The LHA recommend that this detail is provided along with existing / proposed daily vehicle movements and type / length of vehicle using the access.**

  The access is surfaced with hard bound materials.

  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. This access appears to function as the main access (in only). No details of the existing visibility splays from this access have been provided. **The LHA recommend that the applicant provides a suitably scaled plan indicating if this access is to continue as an "in only" access (for which appropriate signage will need to provided) or whether it is also to be used as an exit. If access is to be used for both entry and exit then proposed visibility splays will need to be provided**

on a suitably scaled plan (including annotated dimensions of the access).

The access is surfaced with hard bound materials.

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

This access is approximately 6.5m wide and is gated at approximately 6.2m behind the edge of carriageway. This access appears to function as the main exit (out only). No details of the existing visibility splays from this access have been provided. **The LHA recommend that this detail is indicated on a suitably scaled layout plan (including annotated dimensions of the access).**

If this access is to continue as an "exit only", then appropriate signage will need to indicated on a revised layout plan indicating this detail.

The access is surfaced with hard bound materials.

The LHA recommend that the applicant provides details of how the access arrangements will function when the proposed development is in operation.

- **Parking & Turning Provision**

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).

It is not clear where exactly this car park is located or what number of designated spaces are available for the existing / proposed business. **The LHA request that this detail is provided (including plan) and clarification whether this arrangement is acceptable in Planning terms.**
It is noted that. It is noted that there is a significant amount of existing on-street parking along Second Avenue.

No details of the existing / proposed parking arrangements at the site have been provided. **The LHA recommend that 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).**

No details of the existing / proposed turning arrangements at the site have been provided. **The LHA recommend 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).** Appropriate swept path details will need to be provided of the various types / size of vehicle visiting the site detailing how they will access, park, turn and exit the site.

- 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.

- **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). **The LHA request 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 LHA request clarification if the above equates to 160 movements per week or is it per day.

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

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 the suitability of the proposed development.**

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