MEMORANDUM

wrexham COUNCIL CYNGOR wrecsam

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO:	Dafydd Thomas
Our Ref:	ET/DC/AC/P/2025/0143 Rev 2	**Your Ref:**	P/2025/0143
Date:	18/03/2025		

TOWN AND COUNTRY PLANNING ACT 1990

DEMOLITION OF EXISTING STRUCTURES AND ERECTION OF EMPLOYMENT FACILITIES (CLASS B2/B8) WITH ANCILLARY OFFICE ACCOMMODATION (CLASS B1A) INCLUDING LANDSCAPING, PARKING, ACCESS AND OTHER ASSOCIATED WORKS / DYMCHWEL ADEILADAU PRESENNOL A CHODI CYFLEUSTERAU CYFLOGAETH (DOSBARTH B2/B8) GYDA SWYDDFA ATODOL (DOSBARTH B1A) GAN GYNNWYS TIRWEDDU, PARCIO, MYNEDIAD A GWAITH CYSYLLTIEDIG ERAILL

LAND SOUTH OF BRYN LANE, WREXHAM INDUSTRIAL ESTATE, WREXHAM, LL13 9US

I refer to your consultation / email in respect of the above.

Introduction
The Local Highway Authority (LHA) have reviewed the applicant's Technical Note (Cora IHT, dated 4 March 2026) submitted in response to the LHA consultation comments dated 31/10/2025.

Site Access
Visibility and Speeds
The Technical Note confirms that a new ATC survey was undertaken between 6–13 December 2025, reporting 85th percentile speeds of 50 mph in both directions. It also includes an updated access drawing illustrating 2.4 m × 120 m visibility splays measured to the nearside edge of the carriageway.

However, the drawing does not show the full tangent area as previously requested in the LHA consultation response, and it also lacks a scale bar and specific X- and Y-axis measurements.
The LHA therefore requests that a revised drawing be provided which:

- includes the full tangent area for the western visibility splay; and
- clearly shows all relevant measurements along with a scale bar.

The Note also states a Stage 1 Road Safety Audit is being commissioned. LHA welcome this and will review the RSA Stage 1 and Designers Response when available.

Junction Layout Tracking
The swept paths show the in and out bound HGVs in very close proximity with each other. As in wider discussions, a half metre margin needs to be provided to ensure safe operations.

Parking Provision
The Technical Note includes an indicative B2 layout demonstrating capacity for 285 car parking spaces which is a shortfall of 7 spaces when compared against the Council's parking standards. The LHA considers that the indicative parking provision is appropriate for the B2 use.

Internal Site Circulation
The Technical Note states that revised swept paths demonstrate that articulated HGVs remain within hardstanding, that two HGVs can pass on the eastern route and that the new layout ensures cars and HGVs are segregated from each other. However, the swept paths assessments show that the vehicles pass in very close proximity to the grass verge. This is deemed acceptable in this instance as it will not impact on proposed footways.

Pedestrian and Cycle Access
We note the applicant's view that parking oversupply can embed car dependency and that travel planning can improve active travel uptake. Notwithstanding this, the LHA position remains that walking and cycling connectivity is limited within the industrial estate context; as such, the development is likely to generate a high car mode share, and on-site provision should reflect this unless off-site active travel improvements are secured. The applicant has addressed this concern by providing adequate parking onsite (see above comment on parking provision).

Public Transport Accessibility
The Technical Note notes 850 m distance to the nearest bus stops and suggests that future Investment Zone proposals may enhance services. While this is acknowledged, current accessibility remains modest, particularly for variable shift patterns.

Personal Injury Collision (PIC) Data
The Technical Note updates collision evidence to 2020–2024, identifying one slight cyclist collision at the Industrial Estate Road roundabout (26/04/2021). The LHA notes this and maintains that cyclist safety is a relevant consideration in the detailed design of the site access and frontage (signing, surfacing, inter-visibility). This should be cross-checked in RSA1 and, where relevant, incorporated into mitigation.

Traffic Impact Assessment (TIA) Method
<u>TEMPRO Growth Factors</u>
The provision of the TEMPRO outputs is noted and welcomed. The applicant has based the assessment on the *regional* growth scenario, which is somewhat unusual, as this scenario is typically reserved for sensitivity testing, with the *core* growth scenario more commonly used for standard assessments. However, in this instance the LHA considers the approach acceptable, given that the differences between the growth factors for the two scenarios are marginal.

<u>Trip Generation</u>
Discussions are currently ongoing with the applicant's transport consultant to agree appropriate trip rates for assessing the scheme. The LHA will provide further comments on this matter in due course.

<u>Junction Selection and Modelling</u>
The LHA's expectation remains that arm-specific assessments are undertaken wherever flows on an individual arm increase by ≥ 5% in any peak hour. Where necessary, junction capacity assessments should also be completed, using geometry that is consistent with the latest submitted drawings (for example, a right-turn pocket should not be included unless it is formally proposed). Updated modelling should reflect the agreed trip generation, distribution and scenarios.
If the applicant considers that a junction assessment is not required despite an arm showing a ≥ 5% increase in any peak hour, a clear and robust justification must be provided to support this position.

Mitigation Requirements

The Technical Note states that mitigation measures will be considered once the revised assessments have been completed. The LHA agrees with this approach, and is satisfied that potential mitigation options can be explored once there is a clear and robust understanding of the development proposals and their associated impacts.

Summary and conclusion
The LHA has reviewed the submitted Technical Note and acknowledges the progress made in addressing earlier consultation comments. The additional survey work, updated access drawings, revised swept-path assessments, and provision of updated collision and TEMPRO data are welcomed and provide a stronger evidence base for ongoing assessment.

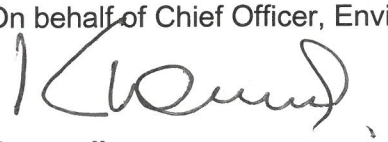
However, a number of matters remain outstanding and require further clarification or amendment before the LHA can reach a final position. In particular:

- A revised access drawing is required showing the full tangent area for the western visibility splay, along with clear X- and Y-axis measurements and a scale bar.
- Swept-path analysis must be updated to incorporate a 0.5 m operational margin between opposing HGV movements.
- The final parking provision must be secured through condition to ensure it appropriately reflects the operational requirements of the end user.
- While the updated internal layout is generally acceptable, attention is needed where swept paths run close to the verge.
- The LHA position remains that walking, cycling and public transport accessibility in this location is limited; therefore, on-site vehicular parking and circulation arrangements must adequately cater for the likely high car mode share.
- Collision data has been adequately updated, and cyclist safety considerations should be incorporated into access design and subsequently reviewed through RSA Stage 1.
- With respect to the TIA, the LHA accepts the use of regional TEMPRO growth in this instance but requires agreement on trip rates and expects arm-specific and junction assessments wherever flows increase by ≥ 5% in any peak hour, unless robustly justified.

The LHA agrees that mitigation discussions should follow once the revised traffic impact assessments have been completed and a clear understanding of development impacts has been established.

Subject to the submission of the above outstanding information, and the resolution of the matters identified within this response, the LHA will be able to progress toward a final highway position on the application.

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.