MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO:	Sharon Holman
Our Ref:	ET/DC/AC/P/2025/0638 Rev 1	**Your Ref:**	P/2025/0638
Date:	15/04/2026		

Town and Country Planning Act, 1990

PROPOSAL: ERECTION OF REPLACEMENT INDUSTRIAL BUILDING / CODI ADEILAD DIWYDIANNOL YN LLE

LOCATION: R AND R ENGINEERING WORKSHOP, OAK ROAD, WREXHAM INDUSTRIAL ESTATE, WREXHAM, LL13 9RG

With reference to the above planning application.

In its previous consultation response, the Local Highway Authority (LHA) reviewed the submitted highways information, including the swept path drawings, parking layout and site access arrangements, and raised a number of concerns and requested additional information.

In summary, the LHA required the following matters to be addressed before the proposals could be supported:

- Update of parking layout and numbers.
- Dimensioned access layout and visibility splays.
- Revised swept paths for ingress and egress.
- Confirmation regarding existing cabin relocation

In response, the applicant has submitted revised Swept Path Tracking Plan (RNW-BML-XX-XX-DR-C-10 P02) and Site Access and Geometric Parameters Plan (RNW-BML-XX-XX-DR-C-1002 P01).

Parking Layout and Numbers.
The submitted Swept Path Tracking Plan confirms that a total of 22 car parking spaces are to be provided, including two disabled bays. Of these, 12 standard parking spaces and the two disabled bays are located to the front of the building, with a further eight standard spaces positioned to the rear.

The standard parking bays are shown to measure 5.0m by 2.5m, with the disabled bays having a width of 3.6m. A minimum manoeuvring aisle width of 6.6m is provided to the rear of the building, which is considered sufficient to allow vehicles to safely enter and exit the parking spaces. Overall, the proposed parking provision accords with the Wrexham Parking Standards and is therefore considered acceptable.
In addition, the applicant has provided two cycle parking spaces to the rear of the building. This provision is in accordance with the Wrexham Parking Standards and is also considered acceptable.

Dimensioned Access Layout and Visibility Splays

Access Arrangement

The applicant has confirmed on the Site Access and Geometric Parameters Plan that: *'Its assumed the hinged part of the gate would be opened to allow the HGV / Articulated vehicles to enter.'* This site access comprises dropped kerbs only, with no defined bellmouth geometry, kerb radii, lane widths, or structural features designed to accommodate HGV movements.

The LHA position is as follows:

- Dropped kerbs alone do not represent an appropriate form of access for an industrial development where HGV traffic is expected.
- The proposed access fails to provide adequate control over vehicle positioning, turning movements, and tracking.
- A properly designed site access junction is required, incorporating suitable kerb radii, carriageway widths, and visibility provision to safely accommodate HGV access and egress.

As currently proposed, the access arrangement is not acceptable to the LHA for a development of this type.

Visibility Splays and Achievability

The visibility splays shown on the submitted access geometry plan have been drawn inconsistently, with splays measured to the centreline of the running carriageway rather than to the nearside kerb edge. This does not reflect standard assessment practice. Furthermore, in several locations the indicated splays do not appear to be achievable on the ground due to the following constraints:

- The presence of third-party land outside the site boundary, including existing parking to the west of the site access.
- Existing boundary features, vegetation, and structures that would restrict the available sightlines.

At this stage, the LHA considers that the applicant has not demonstrated that appropriate and deliverable visibility splays can be achieved at the proposed access.

Revised Swept Paths for Ingress and Egress

The submitted swept path tracking demonstrates that both articulated and rigid HGV movements would over-run the existing kerb lines and pedestrian footway during ingress and egress. This includes:

- Vehicle tracking that encroaches onto the footway and beyond the existing kerb lines.
- Reliance on over-sailing areas, which is not acceptable where those areas are not specifically designed or constructed to accommodate HGV loading or tracking.
- Manoeuvres that would create a clear and unacceptable risk to pedestrians and other highway users.
- For the avoidance of doubt, it is not acceptable from a highway safety perspective for any part of a vehicle, including wheels and chassis, to overrun a pedestrian footway.
- The tracking appears to show that the manoeuvres in and out of the site may require the use of third party land immediately west of the site access. The applicant is requested to confirm that this land is within their ownership.

It can therefore be concluded from the submitted plans that the proposed kerb radii and access widths are insufficient to accommodate the swept paths of the design HGVs without significant encroachment outside the carriageway. This demonstrates that the access geometry as proposed is fundamentally unsuitable for HGV use in its current form.

Confirmation Regarding Existing Cabin Relocation

The applicant has confirmed on the Swept Path Tracking Plan that: *"All existing cabins & containers will be relocated on-site as the extent of the internal yard is to be resurfaced"*. However, the applicant has not confirmed where these are proposed to be relocated to. This information should be provided to the LHA.

Conclusion
While the parking and cycle provision is acceptable in principle and complies with local standards, the proposed access arrangements are fundamentally unacceptable for an industrial development generating HGV traffic. The current design fails to safely accommodate HGV ingress and egress, does not demonstrate deliverable visibility splays, and results in vehicle tracking over pedestrian infrastructure and potentially third-party land.

As submitted, the development does not satisfy highway safety requirements. A redesigned access junction incorporating appropriate geometry, kerb radii, carriageway widths, and fully achievable visibility splays is required, supported by revised swept path tracking. Clarification is also required regarding the relocation of existing cabins and containers. Until these matters are satisfactorily addressed, the proposal is unacceptable to the LHA.

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.