Proposed In-Vessel Composting Facility, Former Befesa Salt Slags Site, Fenn's Bank, Wrexham

Highways Technical Note 01

Prepared for: Veolia UK

April 2026

5039-HTN01

1.0 INTRODUCTION

1.1 Overview

1.1.1 This Highways Technical Note 01 (HTN01) has been prepared by Axis on behalf of Veolia UK ('the Applicant') to respond to the comments raised by the Local Highway Authority (LHA) at Wrexham County Borough Council (WCBC), dated 8th April 2026, in respect of planning application reference P/2026/0075.

1.1.2 Application P/2026/0075 was submitted to the Local Planning Authority (LPA) at WCBC in February 2026 and seeks planning permission for the development of an In-Vessel Composting (IVC) Facility ('the Proposed Development') at the former Befesa Salt Slags Site, Fenn's Bank, Wrexham ('the Site').

1.1.3 The LHA provided a consultation response dated 8th April 2026. Within this response, the LHA confirmed that no objection is raised in principle to the Proposed Development, subject to the provision of further information relating to visibility splays at the proposed site access off Fenn's Bank Lane. Specifically, the LHA have stated:

"The LHA previously recommended that the applicant considers how visibility at the main access can be improved and provides appropriate plans indicating any such improvements. The submitted Visibility Splay Plan (Drg. No. 5039-D01) indicates improvements to the existing visibility from the in access of 2.4 x 193m to the north and 2.4 x 165m to the south measured to a point 1m from the nearside channel line.

Based on the above 85th percentile speeds, any proposed / existing access would normally require visibility splays of 2.4 x 196m to the north and 2.4 x 164m to the south in accordance with TAN 18. The LHA would normally only permit a relaxation to a maximum distance of 0.5m off the existing kerbline (ie/ to the position of the nearside wheel-track).

Although the LHA accept the proposed splays appear to offer a significant improvement, the LHA would recommend that the applicant provides a revised layout plan which indicates the proposed splays measured to a point at no more than 0.5m from the nearside kerb edge."

1.1.4 A full copy of the LHA's consultation response is contained in **Appendix A** to the rear of this report.

1.1.5 As no other concerns have been raised by the LHA in respect of the transport and highway-related aspects of the Proposed Development, the remainder of this HTN01 has been prepared to respond specifically to the comments regarding visibility.

2.0 RESPONSE TO LHA COMMENTS ON VISIBILITY

2.1.1 The LHA have recommended that the Applicant amends the visibility splays shown on Axis Drawing No. 5039-D01 (contained within Appendix F of the Transport Statement submitted with application P/2026/0075) to show the splays measured to a point no more than 0.5m from the nearside channel line. This is recommended on the basis that it represents the position of the nearside wheel-track of vehicles approaching the access along Fenn's Bank Lane.

2.1.2 In practice, visibility splays measured to the nearside channel line represent an inherently conservative assessment, and do not necessarily reflect the actual position of vehicles within the carriageway. This is acknowledged within paragraph B.4 of Technical Advice Note 18 (TAN18) notes that, *"for simplicity [the Y-distance] is measured along the nearside kerb line of the main arm, although vehicles will normally be travelling a distance from the kerb line of the main arm."* The guidance does not however prescribe a specific offset distance from the channel line and so this is considered to be a matter of professional judgement.

2.1.3 As a general principle, the provision of suitable visibility splays from an access or junction is required to ensure the junction can operate safely and that drivers wishing to emerge from the access have a clear view of any oncoming traffic before doing so. Adequate visibility also allows any oncoming vehicles on the major road of a junction to stop within a reasonable distance, should the need arise.

2.1.4 **Axis Drawing Number 5039-D01 Rev A**, contained in **Appendix B** of this HTN, demonstrates that the following visibility splays can be achieved at the recommended 0.5m offset distance:

i) 2.4m x 196m to the north (as referenced within the LHA's consultation response as being commensurate with the 85th percentile speeds and relevant guidance contained in TAN18); and

ii) 2.4m x 151m to the south.

2.1.5 With regard to the southern visibility splay, it is acknowledged that the achievable splay at a 0.5m offset does not fully accord with the level of visibility that is commensurate with the observed 85th percentile speeds along Fenn's Bank Lane (i.e. 2.4m x 165m). A minimum offset of 0.7m from the nearside channel line is required to achieve a visibility splay of 2.4m x 165m. This is also shown on **Axis Drawing Number 5039-D01 Rev A** (**Appendix B**).

2.1.6 Notwithstanding the above, it is considered that the difference in visibility between the 0.5m offset distance referred to by the LHA and the 0.7m offset shown on **Axis Drawing Number 5039-D01 Rev A** (i.e. 200mm) is considered to be negligible in practical terms and would not materially affect the level of visibility that can be achieved by drivers emerging from the site access.

2.1.7 A 0.7m (or even a 1.0m) offset would not fully obscure an approaching vehicle along Fenn's Bank Lane. By way of context, the average car in the UK is approximately 1.8m wide. Even in a scenario where a vehicle is travelling at a 0.5m offset from the nearside channel line, a driver emerging from the access would still be able to see a substantial proportion of the approaching vehicle width, including the offside headlight. As such, this would not compromise the ability of drivers emerging from the Site to perceive and appropriately react to oncoming traffic. This is demonstrated by the swept path analysis on **Drawing Number 5039-D01 Rev A**.

2.1.8 Furthermore, it should be noted that the actual driver position would typically be at a point in excess of 1.0m from the channel line. As such, approaching drivers would still be able to see vehicles waiting at, or emerging from, the site access, and would therefore be able to stop within a reasonable distance, should the need arise.

2.1.9 Notwithstanding the above, it is acknowledged that pedestrians and cyclists are more likely to travel closer to the nearside kerb edge, and may therefore be less prominent within the field of visibility that is achievable at a 0.7-1.0m offset. However, pedestrians and cyclists travel at significantly lower speeds than motorised vehicles and have a commensurately lower stopping sight distance requirement.

2.1.10 **Axis Drawing Number 5039-D01 Rev A** demonstrates that a visibility splay of approximately 2.4m x 151m can be achieved to the south when measured at a 0.5m offset from the nearside channel line. This level of visibility is considered to be more than sufficient to allow drivers emerging from the Site to see and respond to pedestrians and cyclists approaching the Site access from the south.

2.1.11 Without prejudice to the points raised above, it should be highlighted that the existing lawful use of the Site could generate substantially more traffic over the course of an average day than the Proposed Development is forecast to generate. As set out in Chapter 4 of the TS which accompanies planning application P/2026/0075, the existing Site could generate in the region of 321 two-way vehicle trips per day, compared to 73 two-way trips per day associated with the Proposed Development.

2.1.12 As also detailed within the TS, the planning permission for the use of the Site as an aluminium recovery and recycling facility remains extant, as does the associated environmental permit which authorises its operation. In the event that planning permission is not granted for the Proposed Development (Fenn's Bank IVC facility), the Site could reasonably be expected to be remarketed and brought back into operation under this extant consent, and thus generate a level of traffic pertaining to its existing lawful use.

2.1.13 In highways planning terms, the Proposed Development would therefore result in a significant potential de-intensification of the site access by vehicular traffic, and has the potential to result in an overall net benefit to the safety and operation of the local highway network.

2.1.14 Furthermore, there is no evidence of an existing highway safety issue in the vicinity of the Site. An analysis of Personal Injury Accident (PIA) data presented in Section 2.6 of the TS confirms that no PIAs were recorded within the vicinity of the site access between 2019 to 2023 (inclusive). This demonstrates that the local highway network, including the existing site access arrangements, has operated safely, including during periods when the when the aluminium recovery and recycling facility was in operation.

2.1.15 Overall, the visibility provision represents a minor, evidence-based departure from the LHA's recommendation in one direction only, which, when considered alongside the significant reduction in traffic, absence of recorded accidents, and existing lawful fallback position, would not give rise to a severe impact on highway safety.

Appendix A – LHA Consultation Response, 8th April 2026

MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO:	Minerals Officer
Our Ref:	ET/DC/PP/P/2026/0075	**Your Ref:**	P/2026/0075
Date:	08/04/2026		

TOWN AND COUNTRY PLANNING ACT 1990

PROPOSAL: GOSOD CYFLEUSTER COMPOSTIO CAEEDIG (IVC) A DATBLYGIAD CYSYLLTIEDIG / INSTALLATION OF IN-VESSEL COMPOSTING (IVC) FACILITY AND ASSOCIATED DEVELOPMENT

LOCATION: BEFESA, FENNS BANK, WHITCHURCH, SY13 3PA

I refer to your consultation / email dated 18/02/2026 including submitted Transport Statement ref: 5039-TS01a – Dated Dec 2025 in respect of the above.

General

The existing site comprises the former BEFESA Salt Slag facility, a hazardous waste management facility. The proposed development comprises utilizing the existing building with some additional bio filter units to the north of the building to form a composting facility that will process green / food waste. Waste would be delivered in refuse collection vehicles or articulated lorries from the local area.

It is understood that the main access to the site off Fenns Bank Road is also shared with a limited number of industrial units at Mereside Industrial Park located to the south of the BEFESA facility.

Access

The proposed development site is located on Fenns Bank Road which is a rural, classified road subject to a 60mph speed limit.

Based on speeds of 60mph, any proposed / existing access would normally be required to provide visibility splays of 2.4 x 215m in both directions measured to the nearside edge of the adjoining highway in accordance with TAN 18.

The LHA previously suggested that the applicant carries out a speed survey to determine 85th percentile speeds in order to obtain the required Stopping Sight Distances (SSD)/ Visibility Splays.

An ATC / Speed Survey was carried out between the 28/04/2025 and 04/05/2025 by the applicant which determined the following:-

ATC Location	**85th Percentile Speed / Direction**	
1	**58.8mph - Southbound**	55.9mph - Northbound
2	47.9mph - Southbound	**53.7mph - Northbound**

Visibility from the existing access serving the development site is currently inadequate in both directions currently providing splays of approximately 2.4 x 120m in the north westerly direction and 2.4 x 70m in the south easterly direction measured to the nearside edge of the adjoining highway. Visibility is impeded in both directions by the existing hedgerow / vegetation. The hedgerows / vegetation have typically become overgrown since the previous business was in operation. If the application is supported, the LHA recommend that these obstructions to visibility are removed.

The Local Highway Authority (LHA) would not normally be able to support any proposed development that is likely to result in any significant increase in vehicle movements utilising this substandard access.

The LHA previously recommended that the applicant considers how visibility at the main access can be improved and provides appropriate plans indicating any such improvements. The submitted Visibility Splay Plan (Drg. No. 5039-D01) indicates improvements to the existing visibility from the access of 2.4 x 193m to the north and 2.4 x 165m to the south measured to a point 1m from the nearside channel line.

Based on the above 85th percentile speeds, any proposed / existing access would normally require visibility splays of 2.4 x 196m to the north and 2.4 x 164m to the south in accordance with TAN 18.

The LHA would normally only permit a relaxation to a maximum distance of 0.5m off the existing kerbline (ie/ to the position of the nearside wheel-track). Although the LHA accept the proposed splays appear to offer a significant improvement, **the LHA would recommend that the applicant provides a revised layout plan which indicates the proposed splays measured to a point at no more than 0.5m from the nearside kerb edge.**

The existing access serving the site is approximately 45m wide reducing to 8.2m wide at a distance of 14m behind the adjoining carriageway. The access is paved with hard bound materials and is gated approximately 14m behind the adjoining carriageway.

The LHA would recommend that any gates are setback a suitable distance to accommodate the maximum length of vehicle that visits the site clear of the adjoining highway. Based on the largest vehicle (16.5m long HGV) likely to visit the site, the existing gates would benefit from being setback 20m behind the adjoining highway. The submitted layout plans (Drg. No. 50VES_TD_WREXIVC_200_017 Rev A) indicates the gates being setback a minimum of 20m behind the highway boundary which is considered acceptable.

TRICs Data

The submitted Transport Statement (ref: 5039- TS01a Dated Dec 2025) indicates that there is likely to be a reduction in the number of vehicular trips at the proposed site compared with what the existing site is currently capable of generating under its existing lawful use..

<u>Existing Use</u>

The submitted data includes 3 sites. All selected sites are “free standing” locations which is considered comparable. **Two out of three of** the selected sites were surveyed more than

8 years ago and would typically be excluded from the sample. However, the TS has demonstrated that the survey data is relevant by using the TRICS Time Series Analysis Tool. This indicates that trip rates for similar sites have not varied significantly over the selected time period ie/ 2005 – 2022.

Table 4.1 indicates the following traffic generation based on the selected TRICs sites:-

Time Period	Total Trip Rates	Existing Lawful Use Traffic Generation (5865m2 gfa)
08:00 – 09:00	1.029	60
17:00 – 18:00	0.911	53
Daily	5.478	321

The above information indicates that the existing use could have generated around 321 daily vehicle movements.

The submitted information demonstrates that the proposed development is forecast to generate a net decrease of approximately 248 vehicle movements per day when compared with the potential traffic movements that could be generated by the site under its extant permission.

Proposed Use

Estimated traffic generation for the proposed use has been calculated using a "first principles" approach based on detailed information supplied by the applicant. This detail is summarized in the submitted Transport Statement.

The submitted Transport Statement concludes that the proposed development is estimated to produce 55 HGV movements per day and 18 daily staff movements (9 proposed staff) equating to a total of 73 daily vehicle movements.

Parking & Turning Provision

Drg. Nos: VES_TD_WREXIVC_200-015 Rev A & VES_TD_WREXIVC_200-017 Rev A

The Local Highway Authority (LHA) recommend that parking and turning provision at the site complies with LPGN 16 standards.

The submitted car parking layout plan (Drg. no. VES_TD_WREXIVC_200-015 Rev A) indicates the following:-

No	Type
2	Accessible Parking Bay
2	EV Car Charging Bays
16	Standard Car Parking Bay
6	Covered Cycle Shelter

The submitted Transport Statement indicates the following:-

The operation of the Proposed Development is characterised by low staff numbers (i.e. a maximum of 9 staff on site at any one time) and limited, occasional visitor attendance. Accordingly, car parking demand is primarily driven by staff numbers rather than by building GFA.

*As shown on the proposed site plans in **Appendix C**, the Proposed Development includes a total of 20 on-site car parking spaces, including 2no. 3.6m wide accessible*

bays (representing a 10% provision) and 2 no. electric vehicle charging (EVC) bays. On-site car parking will continue to take place within the existing area of hardstanding located adjacent to the office / administration building, to the north of the industrial building.

The on-site car parking provision will be more than sufficient to accommodate the anticipated demand associated with staff parking, together with any occasional increases in demand associated with visitors or contractors.

Based on a robust worst-case scenario, the maximum parking demand is anticipated to comprise up to 9 staff vehicles and up to 3-5 visitor or contractor vehicles at any one time, equating to a total demand of approximately 12-14 vehicles. The provision of 20 on-site parking spaces therefore provides a clear surplus over anticipated demand and ensures that no overspill parking would occur on the surrounding highway network.

Proposed Cycle Parking Provision
Six cycle parking spaces are proposed within the car parking area within a covered cycle shelter comprising 3no. Sheffield stands (i.e. 2 bikes per stand). Details of the proposed cycle shelter are shown on the proposed site plans in ***Appendix C****.*

Based on the above information / detail, the proposed parking provision at the site is considered adequate.

Adequate turning facilities must be provided within the curtilage of the site to accommodate the anticipated vehicle types / sizes visiting the site. The submitted Swept Path Analysis Plans (Drg. Nos.5039-ATR01 & 5039-ATR02) indicates the swept path movements of a 16.5m long HGV and 11.2m long refuse vehicle maneuvering within the site and entering / exiting the site at the main access onto Fenns Bank which is considered acceptable.

Parking / loading bays for HGVs appears to comprise the following:-

- 11 no. parking bays 34m x 5.5m
- 5 no. parking bays 30m x 5.5m
- 7 no. 32 x 5.5m loading bays

The submitted Transport Statement includes the following:-

Given the non-standard nature of the Proposed Development, trip rates cannot be obtained from the industry-standard TRICS database. As such, the traffic generating potential of the Proposed Development has been calculated using a 'first-principles' approach.

In this instance, the first-principles methodology has been informed by detailed operational data supplied by the Applicant, who owns and operates a number of comparable in-vessel composting and waste treatment facilities elsewhere in the UK. The anticipated vehicle movements have therefore been derived from established delivery patterns, vehicle types, payloads and operational practices associated with these existing facilities.

On this basis, the trip generation forecasts presented within this Transport Statement are considered to provide a robust, realistic and site specific representation of how the Proposed Development would operate in practice, and are likely to be more accurate than estimates derived from a generic comparator site which may not reflect the specific contractual,

operational and throughput characteristics of the Proposed Development.

*The document contained in **Appendix I** sets out the first-principles HGV trip generation forecasts associated with the Proposed Development, including the methodology and assumptions used. Review of this document demonstrates that the submitted traffic generation figures for the proposed development indicate that the site is forecast to generate up to around 332 two-way HGV trips per week in total.*

Based on the Site accepting deliveries 6-days per week, this equates to 55 two-way HGV trips (movements) per day, on average.

If the Proposed Development is operational for 11 hours per day (07:00-18:00), then it could therefore generate up to 5 two-way HGV trips per hour, or 1 two-way HGV trip every 12 minutes, on average.

Given the above anticipated vehicle movements and level of HGV parking provision on site, the proposed HGV parking / loading provision is considered adequate.

Refuse Collection / Recycling

The applicant has confirmed that the proposed business will be serviced by a private contractor.

Construction Traffic Management Plan (CTMP)

If an application for development is supported at the site, the LHA may recommend any permission includes the following condition:-

No part of the development shall commence until a Construction Traffic Management Plan including provisions for contractor parking has been submitted to and approved in writing by the Local Planning Authority and the plan as is approved has been fully implemented.

Conclusion

In conclusion, the LHA have no objections in principle to the proposed development and request the following information:-

Visibility Splays

- The LHA previously recommended that the applicant considers how visibility at the main access can be improved and provides appropriate plans indicating any such improvements. The submitted Visibility Splay Plan (Drg. No. 5039-D01) indicates improvements to the existing visibility from the in access of 2.4 x 193m to the north and 2.4 x 165m to the south measured to a point 1m from the nearside channel line.

  Based on the above 85th percentile speeds, any proposed / existing access would normally require visibility splays of 2.4 x 196m to the north and 2.4 x 164m to the south in accordance with TAN 18.

  The LHA would normally only permit a relaxation to a maximum distance of 0.5m off the existing kerbline (ie/ to the position of the nearside wheel-track). Although the LHA accept the

proposed splays appear to offer a significant improvement, **the LHA would recommend that the applicant provides a revised layout plan which indicates the proposed splays measured to a point at no more than 0.5m from the nearside kerb edge.**

Supplementary Notes

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

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 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.

KW Edwards

Contracts & Engineering Manager

On behalf of Chief Officer, Environment & Technical

Appendix B – Drawing Number 5039-D01 Rev A

C:\2026\5039\5039 Shrewton SVT\Dwg\CAD\Transport\5039-D01 Rev A Visibility Splays.dwg

2.4m x 196m VISIBILITY SPLAY TO THE NORTH
(MEASURED 0.5M FROM NEARSIDE CHANNEL LINE)

FENN'S BANK LANE

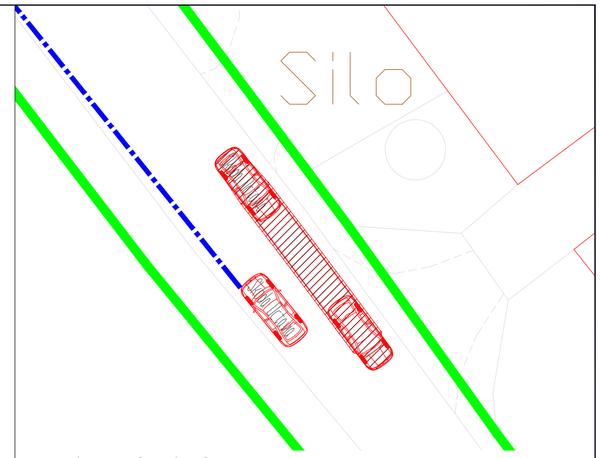
SITE ACCESS

Ponds

90.6m

Silo

2.4m x 151m VISIBILITY SPLAY TO THE SOUTH
(MEASURED 0.5M FROM NEARSIDE CHANNEL LINE)



VP 1 (1:250@A2) - Swept Path Analysis showing a car travelling NB at a 0.5m offset from nearside channel line, and a car travelling in the opposite direction

FENN'S BANK LANE

SITE ACCESS

Ponds

90.6m

See VP 1

Silo

2.4m x 165m VISIBILITY SPLAY TO THE SOUTH
(MEASURED 0.7M FROM NEARSIDE CHANNEL LINE)

Approximate Site Boundary

Adopted Highway Boundary

This drawing is the copyright of AXIS P.E.D Limited and may not be loaned, copied or reproduced in any way - or used for any offer, quote, tender or construction purposes without written consent of the company to do so. Follow any figured dimensions - do not scale for construction purposes. If in doubt ask.

© Crown copyright and database rights
2025 Ordnance Survey AC0000808122

N

0 10 20 30 40 50 75 100m

revision: A desc: Updated per LHA Comments (dated 08-04-2026) date: 16-04-26

0344 8700 007
axis.co.uk

Client
Veolia UK

Project
In-Vessel Composting Facility

Drawing Title
Visibility Splays

Scale
1:1000 @A2

Status
Preliminary

Date
16-12-2025

Drawn Checked
AB AB/GW

Dwg no
5039-D01

Rev
A