

# MEMORANDUM



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|-----------------|----------------------------------------|------------------|-------------------------------------|
| <b>From:</b>    | Chief Officer, Environment & Technical | <b>To:</b>       | Chief Officer Planning & Regulatory |
|                 |                                        | <b>FAO:</b>      | Jenni Perkins                       |
| <b>Our Ref:</b> | ET/DC/PP/P/2023/0598 Res(6)            | <b>Your Ref:</b> | P/2023/0598                         |
| <b>Date:</b>    | 11/05/2026                             |                  |                                     |

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## **TOWN AND COUNTRY PLANNING ACT 1990**

**PROPOSAL: NEWID DEFNYDD ADEILAD O DDEFNYDD AMAETH I DDEFNYDD CYMYSG B1 (BUSNES), B2 (DIWYDIANNOL CYFFREDINOL) A B8 (STORIO A DOSBARTHU) A'R HOLL WAITH CYSYLLTIEDIG / CHANGE OF USE OF BUILDING FROM AGRICULTURE TO A MIXED B1 (BUSINESS), B2 (GENERAL INDUSTRIAL) AND B8 (STORAGE AND DISTRIBUTION) AND ALL ASSOCIATED WORKS**

**LOCATION: RIDLEYWOOD FARM HOLT ROAD RIDLEY WOOD WREXHAM LL13 9US**

I refer to your consultation / email dated 19/03/2026 including revised plans / documents in respect of the above:-

### **Access**

The proposed development site is located on the B5130 Holt Road which is a rural, classified road subject to a 40mph speed limit.

Assuming typical speeds of 40mph, any proposed / existing access in this location would normally be required to provide visibility splays of 2.4 x 120m in both directions measured to the nearside edge of the adjoining highway in accordance with TAN 18.

The applicant has carried out a speed survey to ascertain the 85<sup>th</sup> percentile speeds along this section.

The revised Transport Statement includes an ATC traffic survey which was carried out between 7<sup>th</sup> Nov – 13<sup>th</sup> Nov 2024. This determined 85<sup>th</sup> percentile speeds of 47.2mph for vehicles travelling northbound. However, no data was included for vehicles travelling in the southbound direction. **The LHA recommends the applicant provides this detail.**

**It is noted that the 85<sup>th</sup> percentile values quoted within the table in para. 3.2.4. do not reflect 85<sup>th</sup> percentile value(s) in the submitted data. The LHA recommends the applicant clarifies this anomaly.**

**Based on the above speed(s) derived from the ATC survey, the SSD requirements of TAN 18 would be applicable. This would require a visibility splay of 2.4 x 134m in the southerly direction. However, it is not possible to comment on the northbound visibility requirement as the southbound speeds have not been provided.**

The site is currently served by 2 accesses as follows:-

#### Main Access (to North East)

The LHA understand that this access serves the main farmhouse, provides milk tanker access and the majority of vehicle movements associated with the farm.

Visibility from this access is currently inadequate in the north easterly direction providing a splay of approximately 2.4 x 70m measured to the nearside edge of the adjoining highway. Visibility is impeded by the existing hedgerow.

Visibility in the south westerly direction is adequate providing a splay in excess of 2.4 x 120m measured to the nearside edge of the adjoining highway.

The access is approximately 14m wide reducing to 6.3m wide at 5.3m behind the adjoining carriageway where it is gated. The access is paved with hard bound materials. The LHA would typically recommend that such an access is gated at a minimum distance of 10m behind the adjoining highway or greater if a larger vehicle is utilizing the access.

The LHA would not be able to support any proposed development that is likely to result in any significant increase in vehicle movements utilizing this sub-standard access.

#### Proposed Commercial Use via Main Access

The LHA understand that all existing agricultural activity through this access will cease and any remaining agricultural activity will utilize the south easterly access. The main access will only be used to serve the proposed 5 no. business units.

Given the limited available visibility in the northerly direction, it is proposed to re-locate the main access approximately 17m in the southerly direction to improve visibility in the northerly direction. Any new access will require s.184 / 171 consent to form the new access and reinstate the kerb / verge at the original access point.

The submitted layout plan (Drg. No. 77362 / RJC / 004 Rev F) indicates proposed visibility splays of 2.4 x 105m and 2.4 x 99m to the south west measured to a point 1m off the nearside kerbline. The LHA do not accept visibility splays measured to 1m off the nearside kerbline. A maximum offset of 0.5m would be accepted in this instance. **This detail will require amended plans.**

The proposed visibility splay in the north easterly direction is limited in that the required splay would need to cut across 3<sup>rd</sup> party land. **As indicated above, it is not possible to comment on the northbound visibility requirement as the southbound speeds have not been included with the latest submitted ATC survey data.**

**Based on the submitted ATC survey (85<sup>th</sup> percentile speed of 47.2mph), a visibility splay of 2.4 x 134m would be required in the southerly direction.** The proposed visibility splay in the south westerly direction is 2.4 x 99m measured to a point 1m off the nearside kerbline which is considered inadequate.

The submitted layout plan (Drg. No. 977362/RJC/006 Rev A) appears to indicate the blue line ownership boundary which would appear to cover any potential required splay from the access in the southerly direction. **The LHA recommends the applicant confirms this land is within their control.**

## **Swept Path Details**

The latest Swept Path Plan Drg. No. 77362/RJC/003 Rev D indicates swept paths of a 16.5m articulated lorry entering the site. This would require either no gates being erected or gates setback 20m behind the adjoining highway. It is proposed to setback the gates at this access to 20m from the highway boundary. If all agricultural activity is ceasing through this access, then I would query why such small businesses would require such a large delivery vehicle to visit the site given the relatively small size of the proposed industrial units. **Clarification is required on this detail.**

### **Swept Path Plan (Drg. No. 002)**

This plan indicates the swept path movements of a 16.5m long HGV entering the proposed commercial access from the south west, turning within the site and exiting the access in the south westerly direction. The swept paths do not appear to have been carried out with standard swept path software. **This detail needs to be provided including the software used to demonstrate the tracking.**

**The LHA recommend the applicant submits all inbound & outbound movements in both directions on separate plans.**

The submitted plan indicates the following:-

- It is noted that the vehicles wheels are touching the kerbline along the main road when exiting towards the south west.
- The vehicle encroaches over the majority of the opposite lane when exiting the site (to the south).
- The vehicle encroaches significantly over the centre line of the access when entering / exiting the site.
- The plans do not demonstrate how the access will accommodate a 16.5m HGV and large car (5m length) passing simultaneously through the access.

**The above issues are considered unacceptable and will need to be addressed.**

### **Swept Path Plan (Drg. No. 003)**

This plan indicates the swept path movements of a 10m long rigid HGV entering the proposed commercial access from the south west, turning within the site and exiting the access in the south westerly direction. The swept paths do not appear to have been carried out with standard swept path software. **This detail needs to be provided including the software used to demonstrate the tracking.**

**The LHA recommend the applicant submits all inbound & outbound movements in both directions on separate plans.**

The submitted plan indicates the following:-

- It is noted that the vehicles wheels are touching the kerbline along the main road when entering from the the south west.

- The vehicle encroaches over the majority of the opposite lane when exiting the site (to the south).
- The vehicle encroaches significantly over the centre line of the access when entering / exiting the site.
- The plans do not demonstrate how the access will accommodate a 10m HGV and large car (5m length) passing simultaneously through the access.

**The above issues are considered unacceptable and will need to be addressed.**

Given the proposed horizontal alignment of the main access, it is unlikely to be capable of accommodating the simultaneous passage of 2 vehicles (HGV / car) in its current form which is unacceptable.

### **Highways Plan / Swept Path Plan (Drg. no. 77362/RJC/004 Rev F)**

This plan indicates the swept path movements of a 9.2m long tractor plus trailer turning within the site. However, no details of how it enters and exits the proposed agricultural access have been provided. The swept paths do not appear to have been carried out with standard swept path software. **This detail needs to be provided including the software used to demonstrate the tracking.**

### South Westerly Access (Proposed agricultural use & dwelling access only)

The LHA understand that this access serves as a secondary access providing occasional access to tractors / trailers and movement of cattle.

Visibility from this access in the north easterly direction is adequate providing a splay in excess of 2.4 x 120m measured to the nearside edge of the adjoining highway.

Visibility in the south westerly direction is currently inadequate providing a splay of approximately 2.4 x 75m measured to the nearside edge of the adjoining highway. Visibility is impeded by the existing boundary fence and potentially crosses 3<sup>rd</sup> party land.

The access is approximately 16m wide reducing to 4.2m wide at 7.6m behind the adjoining carriageway where it is gated. The access is paved with hard bound materials. The LHA recommend that such an access is gated at a minimum distance of 10m behind the adjoining highway for agricultural use.

The LHA would not normally be able to support any proposed development that is likely to result in any significant increase in vehicle movements utilizing this sub-standard access.

### Proposed Use via South Westerly Access (agricultural use & dwelling access only)

The LHA understand that all remaining agricultural activity at the farm will utilise this access along with the existing farmhouse (the LHA understand any use by a milk tanker at the site will cease). The main access will only be used to serve the proposed 5 no. business units.

Highways Plan (Drg. no. 77362/RJC/004 Rev F) indicates improvements to the southerly access as follows:-

- Widen to 4.8m for first 10m behind highway boundary
- Surface with hard bound materials for first 10m behind highway boundary
- Set gates back 15m behind highway boundary

**Note:**

- An Aco drain or similar will be required across the access to intercept any private surface water run-off where it falls towards the highway.
- The LHA recommends any existing vehicular accesses / gates located either side of this access are permanently closed up.

It is proposed to improve visibility from this access in the south westerly direction by setting back the existing boundary fence. However, the submitted layout plan (Drg. no. 77362/RJC/004 Rev F) only indicates a marginally improved splay of 2.4 x 83m which is significantly less than current visibility standards ie/ 2.4 x 134m. Based on the submitted plan (Drg. No. 77362/RJC/006 Rev A), there would appear to be scope to improve this splay further based on the applicant's extent of ownership. **The LHA recommends the applicant provides a revised plan indicating the required splay(s).**

This access would benefit from widening to a minimum width of 4.8m for at least 10m behind the adjoining highway and surfaced with hard bound materials. This detail has been indicated on the revised layout plan.

Although, this access has limited visibility in the south westerly direction, it is an existing access through which has been used for previous agricultural related purposes. **However, the LHA previously requested information on existing daily vehicle movements generated at the site, distinguishing between traffic movements through each access point separately (see comments under Traffic Generation below). The LHA recommends the applicant provides this information.**

## **Parking & Turning Provision**

Adequate parking and turning provision will need to be provided for the proposed 5 no. commercial units. **As previously highlighted, the LHA recommends the applicant provides details of the precise LPGN 16 Class Use (eg/ B1, B2 , B8) along with the individual allocated floor areas of each unit (A-G) in order to assess parking provision.** The submitted plans indicate the provision of 37 spaces in total for the 5no. commercial units. **I await the requested information.**

The LHA understands that some existing agricultural activity will continue at the farm. Details of the parking and turning arrangements for this activity is provided / indicated on the revised layout plan. Parking provision for the farming element of the site has been demonstrated and is considered acceptable.

**The submitted swept path details** (Drg. No. 77362/RJC/004 Rev F) indicate the movements of a tractor & trailer within the site but not in / out of the south westerly access. The swept paths do not

appear to have been carried out with standard swept path software. **This detail needs to be provided including the software used to demonstrate the tracking.**

The LHA understand that a milk tanker currently visits the site on a daily basis utilising the existing north easterly access. The LHA understand that the milk tanker reverses off the road into the site due to limited turning space which is not ideal. However, the LHA understand that the need for milk collection will cease at the farm under this proposal and has been confirmed by the applicant.

### **Active Travel**

The LHA have consulted with the WCBC Active Travel Section in respect of any specific requirements for the proposed development (eg/ cycle parking / shelters) that may be required under the Active Travel Act Guidance. The LHA will forward any comments when they are received.

### **Traffic Generation**

The submitted TRICs data indicates 14 no. sites for Class B2 Use and 14 no. sites for Class B8 Use. The proposed development also includes Class B1 Use but no TRICs information on this class use has been provided. **The LHA recommends this information is provided.**

In terms of the submitted TRICs information, the LHA comment as follows:-

- Some of the survey data is more than 8 years old. Survey data must be no more than 8 years old.
- A number of the selected sites are significantly greater in size (gfa) than the proposed commercial development which are considered unlikely to reflect the characteristics of the proposed development.
- The majority of the sites have selected locations which are considered unlikely to reflect the characteristics of the proposed development. Any proposed sites located in Ireland should also be excluded from the survey.

The selected Class B2 Use data appears to have been copied from the KSS 3 Eutopia Site on the edge of Wrexham Industrial Estate (Bryn Lane). This site is not considered to have similar characteristic to the proposed development site.

The summary of proposed development trips does not include an overall trip summary based on the combined Class B1, B2 & B8 Use for the overall development (ie/ 1056m<sup>2</sup> gfa).

**The LHA recommends the applicant addresses the issues raised above.**

On reviewing the previously submitted traffic movement information, I comment as follows:-

It is stated that currently both accesses are used to serve the farming enterprise. The existing Dairy Enterprise movements when roughly calculated on a daily basis only equate to approximately 8.2 movements per day (of which 3.6 movements relate to HGVs), which is relatively low.

The revised Transport Statement does not include any details relating to the existing or proposed daily vehicle movements anticipated at the remaining farm / agricultural element of the site which will utilise the southerly access. **The LHA recommends the applicant provides this information.**

## **Sustainability**

The development site is located on a rural, classified road along which there is no footway provision / street lighting. It may be considered that the proposed development site is in an unsustainable location and does not support the opportunity for staff to walk safely to local facilities and public transport stops.

## **Public Footpath**

Public footpath - PROW, Isycoed no. 8 passes alongside the south western boundary of the site and must not be interfered with. The LHA recommends that the applicant liaises with our Public Rights of Way Section to discuss the proposed development. Please contact Mr. Sean Hanratty on Tel: 01978 729761.

## **Service and Delivery Management Plan (SDMP)**

If supported, it may be considered appropriate to include a condition for a SDMP to control the type/ size / frequency of delivery vehicles to the site. The latest Transport Statement indicates that only car / vans will typically visit the proposed commercial units.

## **Construction Traffic Management Plan (including details of contractor parking)**

If supported, in order to construct the proposed scheme, the applicant will need to submit a Construction Traffic Management Plan including details of contractor parking for further approval. This could be included as a planning condition.

## **Conclusion**

Given the issues highlighted above, it would be difficult for the LHA to support the proposed development.

## **Supplementary Notes**

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

## ***Note to Applicant:***

*Public Footpath No.8 - Isycoed passes through / alongside the development site and should not be interfered with. The LHA recommends that the applicant liaises with our Public Rights of Way Section to discuss the proposed development. Please contact Mr. Sean Hanratty on Tel: 01978 729761.*

*KW Edwards*

Contracts & Engineering Manager

On behalf of Chief Officer, Environment & Technical