# MEMORANDUM

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| **From:** | Chief Officer, Environment & Technical | **To:** | Chief Officer Economy & Planning |
| | | **FAO::** | Philip Mullineux |
| **Our Ref:** | ET/DC/DB/P/2024/1618 Response 3 | **Your Ref:** | P/2024/1618 |
| **Date:** | 27/02/2026 | | |

**TOWN AND COUNTRY PLANNING ACT 1990**

**PROPOSAL: CODI 8 UNED DDIWYDIANNOL YSGAFN - DOSBARTH B1 (BUSNES) A B8 (STORIO A DOSBARTHU) / ERECTION OF 5 NO LIGHT INDUSTRIAL UNITS - CLASS B1 (BUSINESS) AND B8 (STORAGE AND DISTRIBUTION)**
**LOCATION: THE COOPERATIVE, WELL STREET, CEFN MAWR, WREXHAM, LL14 3YD**

I refer to your amended consultation received 21/04/2026, issuing to the updated Transport Assessment dated ref P3.

Note 3.4 refers to the removal of the splitter islands and provision of HGV swept paths. Whilst the entrance is an existing entrance, demonstration that safe pedestrian access can be provided is required prior to approval. Without any splitter islands for pedestrian refuge, the entrance width is excessive. There is no kerb-line on the crossover to the south, but there is one to the north. The LHA requires provision of an amended plan that shows the following prior to being able to support the scheme from a highway's perspective:

1. Proposed amended kerbing with radii shown and set out so the pedestrian crossing distance is within industry accepted dimensions, whilst not compromising vehicles passing in opposite directions.
2. Tactile crossings at desire lines
3. Visibility splays in accordance with Manual for Streets and TAN 18 as suggested condition
4. A note committing to resurfacing the crossover and tie in between existing and the highway.
5. Proposed road markings other detailing can be agreed via a s278 agreement.

Note 3.5 - Refers to the existing building to the north continuing its use across this proposed site and sharing the access. Whilst this should have been included within the original data and assessment, it is acknowledged that this is an existing situation, with low traffic flow and any proposals to change this building would be subject to separate review via a separate application.

Note 4.7- Traffic Impact Summary – It is accepted that the extant permission could re-open as a discount store and this would likely generate higher traffic flows particularly at peak times. Consequently, this statement is accepted.

Notes 5.6- 5.8 – The applicant is requested to highlight the area within the site to be allocated for refuse collection on a site plan, as suggested in note 5.6. This is required to demonstrate that accessing this area for both vehicles and pedestrians has been considered. Historically there was a service area to the south of the existing building, which appears to have been used for parking and cycle parking. The LHA need to be confident that each unit would not be wheeling out bins and

leaving them on the entrance splay obstructing the footpath, and visibility splays, even infrequently. It is assumed the refuse collection will be a privately procured service by the applicant/users of the development.

The location of the site is accepted as being in a sustainable location with bus stop outside and within walking distance of retail and residential areas.

Parking: The existing approved scheme for change of use to the previous retail unit was approved as combined B1/B8 usage for 875m2 planning ref P/2023/0008. This current site proposal is for 525m2, totalling 1400m2 with the 2023 application.
Using all B1 usage referenced against LPGN16 would require a maximum nr of spaces of 46nr spaces at 1 space per 30m2.
Using all B8 usage against LPGN16 would require a maximum of 14nr spaces.
The proposed plan refers to provision of 27nr spaces. Given the sustainable location of the site and likely market these units would attract, the LHA have no objection to the provision of 27nr spaces, but **request the applicant complies with the LPGN16 requirement for a minimum 10% provision of Mobility spaces.**

**Conclusion**

Whilst it is recognised that the entrance is an existing entrance, it has not been used for some years and the introduction of the Tesco store and adjacent roundabout has altered the pedestrian flows, and potentially character of the entrance.
The crossing is substandard and requires reconstruction to current standards with particular consideration to the overall width, and items listed above. It is the opinion of the LHA that this layout should be agreed prior to approval. Construction engineering and levels can be finalised at Section 278 stage should the site be supported and progresses to approval.

The parking provision and layout should be amended to provide 10% mobility spaces in accordance with LPG16 (ideally 3nr spaces widened and marked up to 3.6m wide with road markings.)

The bin storage area and access to and from should be provided, to negate fears of obstructions to the highway, but the final detailing can be agreed by inclusion of a Service Delivery Management plan condition.

The LHA also request a Construction Traffic Management Plan condition be applied for approval prior to commencement of construction.

For 1400m2 development land, utilising 1 cycle space per 300m2 as 100% B1, 5 lockable secure spaces should be provided. The latest plan indicates a space capable of securing 6 bikes on 3 Sheffield style loops. This is adequate, if space between each is provided.

Suggested standard conditions to be applied, after the entrance setting out is provided on a site plan:

**HW16** **VISIBILITY SPLAYS (NEARSIDE AND CENTRELINE)**
016R Prior to first use of the development hereby permitted the vehicular access shall provide visibility splays of **2.4** metres x **25** metres to the **north** measured to the nearside edge of the adjoining highway, and **2.4** metres x **25** metres to the **south** measured to the centreline of the adjoining highway. Within these splays there shall be no obstruction in excess of 1 metre in height above the level of the adjoining highway. The splays shall thereafter be permanently retained clear of any such obstruction to visibility.

**HW30** **CONSTRUCTION TRAFFIC PLAN**

013R No development shall commence, including any works of demolition, until a Construction Traffic Management Plan has been submitted to and approved in writing by the Local Planning Authority. The approved statement shall be adhered to throughout the construction period.

**HW31 SERVICE AND DELIVERY MANAGEMENT PLAN**

013R The development shall not be occupied until a Service and Delivery Management Plan has been submitted to and approved in writing by the Local Planning Authority. Servicing and deliveries to the development shall take place in accordance with the approved Service and Delivery Management Plan.

**HW23 PROVISION OF CYCLE PARKING FACILITIES**

020R Prior to first use of the development on-site bicycle parking facilities shall be provided in strict accordance with a scheme that shall have first been submitted to and approved in writing by the Local Planning Authority. The facilities shall thereafter be permanently retained and kept free of any obstruction and made available solely for the parking of bicycles.

NON STD **PROVISION OF SAFE PEDESTRIAN ACCESS AT THE SITE ENTRANCE:** The site entrance works to provide safe pedestrian crossing and access should be constructed to the approved standard prior to first occupation. The completion of this work will be subject to a separate agreement with the LHA

*KWEdwards*

Contracts & Engineering Manager

**On behalf of Chief Officer, Environment & Technical**

*Previous Response 2 wording for ease of reference:*

*I refer to your consultation / email dated 09/12/2024 in respect of the above and amended details submitted/received 15 December 2025*

*The site was subject to a change of use from the A1 (Retail – former store) to a combination of B1 (Business) and B8 (Storage and Distribution). Ref P/2023/0008.*

*This application relates to the erection of 5nr additional new build light industrial units within the existing parking area.*

*On reviewing the amended submission the LHA advise as follows:*

*There is no reference made to third party parking to the north of the site, that appear to utilise this site for access. The latest plan shows a zig zag line suggesting this access is to be block. Please clarify if this is correct. If so, the LHA would request any permission be conditioned accordingly.*

*Other comments raised:*

***Trip Rates / Calculations***

- *No multimodal trip generation has been provided.*

- *The baseline (existing) trip generation has been derived using Discount Food Store rates (see Appendix C). This is unusual given the former use was a Co-Op/Somerfield, so this appears to be an error. While it's unlikely to materially affect the comparison—since the use of standard supermarket rates would likely increase the calculated existing trips—we should highlight this in our response and note that the current approach is likely to underestimate existing trip levels.*

- *The use of the office category for the proposed development results in higher car trip numbers compared to light industrial. However, no HGV trip calculations have been included, and we would typically expect higher HGV movements for light industrial uses than for office.*

***Tracking***

- *The applicant has shown the HGV accessing the site, however, the tracking looks like it runs over the island to northern splitter island. Note the islands are not shown on the tracking drawings but it certainly looks like it would run over it (see below).*

- *The applicant has not tracked access to the bin store on the southern side of the site. This area appears tight, particularly if a vehicle is parked in space 16.*



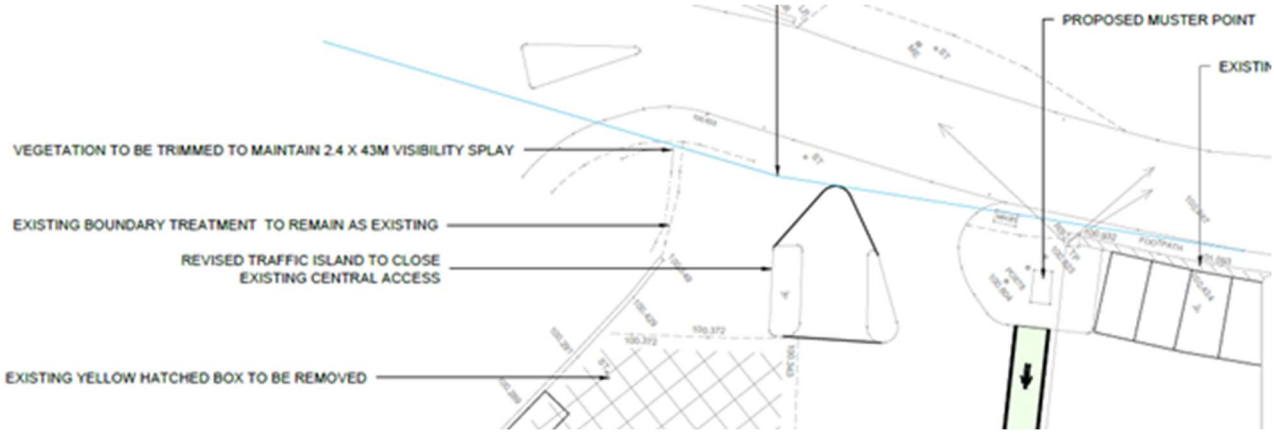

***Access Provision***

- *Although the access is existing and the Transport Statement concludes that the proposals will not intensify its use, however as the immediate highway network around the site has significantly changed (I.e. the compact roundabout) we should request that the applicant provides a simplified access arrangement to ensure safe access.*

- *The current bellmouth is approximately 15 m wide, includes two splitter islands, and lacks dropped kerbs or tactile paving. Ideally, the access would be realigned to remove the splitter islands and provide a standard T-junction with appropriate pedestrian facilities.*

- *In addition, visibility to the south appears to be restricted by a wall and vegetation, which will need cutting back to achieve suitable visibility splays. Please confirm this will be maintained in perpetuity by the applicant, or include for a hard bound paved material within the splay.*

- *If full reconfiguration is not feasible due to statutory undertakers' equipment, the 2023 planning application proposed enlarging the central island (see screenshot). As a minimum, we should request this amendment, along with dropped kerbs and tactile paving, to ensure safe pedestrian access across the junction.*




*It is noted that some cycle parking has been incorporated on the latest plan. Is this for both the applications relating to this site? I.e. All 10nr units.*

*<u>Response 1 retained for reference as follows:</u>*

*At present there is insufficient information to be able to undertake a full assessment of the proposals from a highways perspective, however the LHA would note concern over the general lack of parking, and service delivery circulation in particular.*

*Can the applicant be requested to review and respond to the following:*

- *Reviewing the TRICS data, we have concerns over the relevance and accuracy of that provided. The extant permission for 750m2 generates 49nr 2 way trips at the pm peak. Referring to P/2024/0008, there is reference to 800m2 of existing building. Can the applicant clarify what is the existing GIA*
- *The plan refers to 5nr units at 105m2 each, totalling 525m2 increase in lettable area*
- *Parking appears low when totalling the existing and proposed sites together with the access required to third party land adjacent to the site, which has a right of access through the applicant's land.*
- *The applicant should provide a full dimensioned swept path that demonstrates that a HGV of an appropriate size can access the site and turning around within the site. The LHA have previously accepted that rigid HGV's are more common for light industry use**. So this can be accepted on the understanding that any approval restricts or qualifies the use, and a Service Delivery Management Plan is provided confirming the same. SWEPT PATHS FOR A RIGID HGV RECEIVED.***
- *Separate segregated pedestrian access across and around the site needs to be provided and shown on a scaled site plan **THE PLAN INDICATES A PATH, BUT A CROSSING HIGHLIGHTED IN ROAD MARKINGS WOULD BE BENEFICIAL TO WARN VEHICLES.***
- *Details of proposed cycle parking and refuse collection need to be added to the proposed site plan.**SOME SHOWN, BUT SHOULD BE REFERENCEDTO LGP16 AND BE ADEQUATE FOR THE WHOLE OF THE SITE.***
- *We would request the application takes note of LHA's previous comments relating to recommendations at the site entrance, with particular respect to pedestrian refuse. (P/2023/0008) **COMMENTS UPDATED IN THE ABOVE RESPONSE 2 COMMENTS.***
- *The Application form doesn't refer to the existing, but the red line includes the existing building. Please clarify if this is relevant **PLEASE CLARIFY***

**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 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.*