MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO:	Jenni Perkins
Our Ref:	ET/DC/PP/P/2026/0019 Res(3)	**Your Ref:**	P/2026/0019
Date:	14/07/2026		

TOWN AND COUNTRY PLANNING ACT 1990

PROPOSAL: NEWID DEFNYDD ADEILAD O DDOSBARTH B8 (STORIO A DOSBARTHU) I DDOSBARTH A1/A3 CYMYSG (MANWERTHU) A GWAITH CYSYLLTIEDIG / CHANGE OF USE OF BUILDING FROM CLASS B8 (STORAGE AND DISTRIBUTION) TO MIXED CLASS A1/A3 (RETAIL) AND ASSOCIATED WORKS

LOCATION: UNIT A, CROESNEWYDD ROAD, WREXHAM, LL13 7TB

I refer to your consultation / email dated 24/06/2026 and revised plans (Drg. No.1979-ACS-XX-ZZ-DR-T-001-C & 1979-ACS-XX-ZZ-DR-T-002-A) in respect of the above.

General

The proposed development comprises the change of use from former Class B8 Storage & Distribution Warehouse of pharmaceutical products to Class A1 / A3 – Retail Use. It is proposed to utilise part of the former buildings (160m^2 gfa) for the proposed development.

Access

The proposed development site is accessed off Watery Road which is a busy, classified road subject to a 20mph speed limit. Based on typical speeds of 20mph, any proposed / existing access would require visibility splays of 2.4 x 25m in both directions measured to the nearside edge of the adjoining highway.

Visibility from the existing proposed access is adequate providing splays in excess of 2.4 x 25m in both directions measured to the nearside edge. However, the proposed visibility splays have not been indicated correctly on the submitted plans showing the west splay measured at approximately 1.6m off the nearside kerb edge. The existing access is 9m wide and the proposed access width is 6.5m wide which has reduced the available visibility in the westerly direction.

The revised swept path plans still indicate the above reduce access width and inadequate splay which is unacceptable.

The LHA recommend that the full extent of the required / proposed splays from a re-located proposed access are indicated on a suitably scaled plan.

The access crosses an existing layby (adopted highway) onto Watery Road which it is understood has been used for loading / unloading in the past. **After consultation with our Traffic & Active Travel Sections, the LHA recommend that this layby (2.6m wide adopted highway) is closed up / modified to provide a section of footway up to the eastern side of the access including appropriate dropped kerb / tactile crossing points across Watery Road.** This will significantly improve pedestrian access in and around the site and provide an improved link to the existing cycleway / footway provision in this location. A pedestrian link into the development site will also need to be indicated (not shown) on a revised layout plan. This will provide some mitigation for the limited number of parking spaces being proposed at the site. Having reviewed such a proposal, it may be considered acceptable for the applicant to carry out these works via s.184 / 171 consent with construction details included. This detail has not been indicated on the revised plan. **The LHA recommend the applicant provides a suitably scaled layout plan indicating this detail.**

There would appear to be an internal vehicular access linking to the additional buildings to the rear of the original site. This site has a number of access points onto Dolydd Road. It is unclear as to whether the current application site will have vehicle access rights to use this access and access points onto Dolydd Road to the rear. There would appear to be 3 existing commercial units (Units A, B & C) served off the Watery Road access. It would be considered beneficial to limit vehicular access to these 3 units via the Watery Road access and close up the alternative internal vehicular access link to the units off Dolydd Road. **The LHA recommend that this detail is confirmed / indicated on a revised layout plan.**

The existing access is approximately 9m wide and crosses an existing layby onto Watery Road. The access is surfaced with hard bound materials. The proposed access indicated on the revised layout plan is only 6.5m wide. This will need amending / re-locating in order to provide the required visibility splay. **The LHA recommend the applicant provides a suitably scaled layout plan indicating this detail.**

If the application is supported, the proposed development leaves the existing assumed Class B2/B8 units behind this unit undeveloped. It is not clear what existing / future use these remaining units will be utilised for given the remaining parking / turning areas would be significantly reduced from the previous arrangement. **The LHA recommend that this detail is clarified.** It may be the case that the remaining units could have very limited scope to be redeveloped in the future. This detail will need to be discussed / confirmed with the Planning Department.

There are 3 existing business units (units A, B & C) currently directly served off the Watery Road access.There was a recent planning application for the unit(s) behind the proposed development site (ref: P/2025/0264 – Proposed change of use to Class D2 Assembly & Leisure). The LHA understand that this application has been withdrawn. It is not clear what business / use Units B & C are being used for. **The LHA request further details on this detail. Without knowing this detail, it would be difficult for the LHA to assess the suitability of the current application at the front of the site.**

Traffic Generation

No details of the existing / proposed daily vehicle movements from the site have been provided accessing directly onto Watery Road. **The LHA recommend that this detail is provided along with the type/size/length of vehicles that previously visited the site along with the type/size of vehicles that will visit the proposed site.**

Parking & Turning Provision

Parking

Adequate parking and turning provision will need to be provided in accordance with LPGN 16 requirements.

The LHA understand that the proposed unit has a gross floor area of approximately 160m^2. Internally, two thirds of the footprint is to be for the 'back of house' area which includes the food preparation area, staff toilets, storage, and staff resting area. To the front of the building, the main entrance will lead into the counter and serving area with a seating area (approximately 10 seats). Based on this sub-division, it is assumed that 107m^2 gfa will be allocated to Class A1 Use and 53m^2 net public floor space for Class A3 Use.

Based on LPGN 16 requirements, the proposed Class A1 Use (107m^2 gfa) would require a maximum of 7 spaces and the proposed Class A3 Use (53m^2 gfa) would require a maximum of 13 spaces equating to a total maximum requirement of 20 spaces.

The revised layout plan indicates 7 spaces (1 space laid out to mobility standards).This represents a 65% shortfall compared with LPGN 16 maximum parking standards. However, the proposed level of parking provision is accepted in this instance given the sustainable location of the site along with the potential footway improvement fronting the site. **The LHA recommend that this detail (footway improvement) is indicated on a suitably scaled plan.**

Cycle Parking / Shelter

Adequate cycle parking / shelter will be required in accordance with LPGN 16 & Active Travel Guidance. Limited details of such provision has been indicated on the revised plans. **The LHA recommends that this detail is indicated on a suitably scaled plan (ie/ Sheffield stands, associated spacings with shelter including annotated dimensions).** The applicant may wish to liaise with our Active Travel Section on Tel: 01978 729667 for further guidance on this detail.

Swept Path Details (Drg. No.1979-ACS-XX-ZZ-DR-T-001-C & 1979-ACS-XX-ZZ-DR-T-002-A)

The revised plan indicates the swept path details of a 10m long rigid HGV and 10.2m long refuse vehicle entering the site from the east & west, turning within the site and exiting in either direction. The swept path detail of both vehicles indicate significant encroachment over the centreline of the adjoining highway (Watery Road) when exiting to the west which is far from deal on such a busy road. The swept paths should indicate less of an impact / encroachment if they are repeated using the existing 9m wide access as requested. It is noted that larger HGVs are likely to have accessed this site in respect of the previous business. **The LHA recommends the swept paths are repeated / submitted using the existing 9m wide access arrangement / indicating the necessary visibility splays.**

It is assumed that any waste / recycling collections will be serviced by a private waste company / vehicle. **The LHA recommend that this detail is confirmed.**

Note: The existing layby fronting the site is likely to be removed and replaced with a footway so cannot be used for loading / unloading.

It is noted that the turning of the above HGV (delivery vehicle) takes place in land outside of the red line application boundary. **The LHA recommends that the applicant confirms that they have ownership of this land.** As previously indicated, the above turning arrangements may severely impact on the potential use of the 2 no. units behind Unit A in respect of potential parking & turning

provision any future occupiers may need. If the above arrangement is considered acceptable, then it may be the case that a suitable service delivery management plan (SDMP) is included as a condition whereby all deliveries will need to be carried out outside of the business operational hours within a given size of vehicle where all parking spaces fronting Units B & C are vacant.

Waste / Recycling

As detailed above.

No details of waste / recycling storage & collection areas and type /size of bins have been provided. **The LHA recommend that this detail is indicated on a suitably scaled plan (including annotated dimensions of specific types of bins in a given area).**

Conclusion

In conclusion, the LHA request the following additional information:-

- **Access**

  The proposed development site is accessed off Watery Road which is a busy, classified road subject to a 20mph speed limit. Based on typical speeds of 20mph, any proposed / existing access would require visibility splays of 2.4 x 25m in both directions measured to the nearside edge of the adjoining highway.

  Visibility from the existing proposed access is adequate providing splays in excess of 2.4 x 25m in both directions measured to the nearside edge. However, the proposed visibility splays have not been indicated correctly on the submitted plans showing the west splay measured at approximately 1.6m off the nearside kerb edge. The existing access is 9m wide and the proposed access width is 6.5m wide which has reduced the available visibility in the westerly direction.

  The revised swept path plans still indicate the above reduce access width and inadequate splay which is unacceptable.

  The LHA recommend that the full extent of the required / proposed splays from a re-located proposed access are indicated on a suitably scaled plan.

  The access crosses an existing layby (adopted highway) onto Watery Road which it is understood has been used for loading / unloading in the past. **After consultation with our Traffic & Active Travel Sections, the LHA recommend that this layby (2.6m wide adopted highway) is closed up / modified to provide a section of footway up to the eastern side of the access including appropriate dropped kerb / tactile crossing points across Watery Road.** This will significantly improve pedestrian access in and around the site and provide an improved link to the existing cycleway / footway provision in this location. A pedestrian link into the development site will also need to be indicated (not shown) on a revised layout plan. This will provide some mitigation for the limited number of parking spaces being proposed at the site. Having reviewed such a proposal, it may be considered acceptable for the applicant to carry out these works via s.184 / 171 consent with construction details included. This detail has not been indicated on the revised plan. **The LHA recommend the applicant provides a suitably scaled layout plan indicating this detail.**

  There would appear to be an internal vehicular access linking to the additional buildings to the rear of the original site. This site has a number of access points onto Dolydd Road. It is unclear as to whether the current application site will have vehicle

access rights to use this access and access points onto Dolydd Road to the rear. There would appear to be 3 existing commercial units (Units A, B & C) served off the Watery Road access. It would be considered beneficial to limit vehicular access to these 3 units via the Watery Road access and close up the alternative internal vehicular access link to the units off Dolydd Road. **The LHA recommend that this detail is confirmed / indicated on a revised layout plan.**

- **Existing Business Units**

If the application is supported, the proposed development leaves the existing assumed Class B2/B8 units behind this unit undeveloped. It is not clear what existing / future use these remaining units will be utilised for given the remaining parking / turning areas would be significantly reduced from the previous arrangement. **The LHA recommend that this detail is clarified.** It may be the case that the remaining units could have very limited scope to be redeveloped in the future. This detail will need to be discussed / confirmed with the Planning Department.

There are 3 existing business units (units A, B & C) currently directly served off the Watery Road access.There was a recent planning application for the unit(s) behind the proposed development site (ref: P/2025/0264 – Proposed change of use to Class D2 Assembly & Leisure). The LHA understand that this application has been withdrawn. It is not clear what business / use Units B & C are being used for. **The LHA request further details on this detail. Without knowing this detail, it would be difficult for the LHA to assess the suitability of the current application at the front of the site.**

- **Traffic Generation**

No details of the existing / proposed daily vehicle movements from the site have been provided accessing directly onto Watery Road. **The LHA recommend that this detail is provided along with the type/size/length of vehicles that previously visited the site along with the type/size of vehicles that will visit the proposed site.**

- **Cycle Parking / Shelter**

Adequate cycle parking / shelter will be required in accordance with LPGN 16 & Active Travel Guidance. Limited details of such provision has been indicated on the revised plans. **The LHA recommends that this detail is indicated on a suitably scaled plan (ie/ Sheffield stands, associated spacings with shelter including annotated dimensions).** The applicant may wish to liaise with our Active Travel Section on Tel: 01978 729667 for further guidance on this detail.

- **Swept Path Details (Drg. No.1979-ACS-XX-ZZ-DR-T-001-C & 1979-ACS-XX-ZZ-DR-T-002-A)**

The revised plan indicates the swept path details of a 10m long rigid HGV and 10.2m long refuse vehicle entering the site from the east & west, turning within the site and exiting in either direction. The swept path detail of both vehicles indicate significant encroachment over the centreline of the adjoining highway (Watery Road) when exiting to the west which is far from deal on such a busy road. The swept paths should indicate less of an impact / encroachment if they are repeated using the existing 9m wide access as requested. It is noted that larger HGVs are likely to have accessed this site in respect of the previous business. **The LHA recommends the swept paths are repeated / submitted using the existing 9m wide access arrangement / indicating the necessary visibility splays.**

- **Waste / Recycling**

  It is assumed that any waste / recycling collections will be serviced by a private waste company / vehicle. **The LHA recommend that this detail is confirmed.**

  It is noted that the turning of the above HGV (delivery & refuse vehicle) takes place in land outside of the red line application boundary. **The LHA recommends that the applicant confirms that they have ownership of this land.**

- No details of waste / recycling storage & collection areas and type /size of bins have been provided. **The LHA recommend that this detail is indicated on a suitably scaled plan (including annotated dimensions of specific types of bins in a given area).**

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.

K W Edwards

Contracts & Engineering Manager

On behalf of Chief Officer, Environment & Technical