

MEMORANDUM



From:	Chief Officer, Environment & Technical	To:	Chief Officer Planning & Regulatory
		FAO:	Sarah Stuba
Our Ref:	ET/DC/PP/P/2023/0598 Res(7)	Your Ref:	P/2023/0598
Date:	15/09/2026		

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 20/08/2026 including revised Highway Technical Note – Dated 14th July 2025 (including comments relating to the LHAs previous response – ref: P/2023/0598 Res(6) & additional information provided on 01/09/2026 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 85th percentile speeds along this section.

The previous Transport Statement included an ATC traffic survey which was carried out between 7th Nov – 13th Nov 2024. However, no data was included for vehicles travelling in the south westerly direction. The LHA recommended the applicant provided this detail.

The LHA previously requested clarification regarding the ATC data provided within the Transport Statement, as the values presented by the applicant did not correspond with those used in the determination of the SSD requirements. It is acknowledged that information relating to the ATC survey data and visibility requirements was provided to, and discussed with, the LHA prior to the submission of the planning application. However, as this information was not formally submitted as part of the planning application documentation, it was not considered within the LHA's formal highways response.

Notwithstanding the above, the applicant has subsequently provided the raw ATC data, which confirms 85th percentile vehicle speeds of 41.3 mph (38.8mph wet weather speed) for the eastbound approach and 43.1 mph (40.6mph wet weather speed) for the southbound approach. These values correspond with those used in the applicant's SSD calculations.

Based on the above speed(s) derived from the ATC survey, the SSD requirements of TAN 18 would be applicable. This would require visibility splays of 2.4 x 99m in the south westerly direction and 2.4 x 106m in the north easterly direction.

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 106m to the north east and 2.4 x 99m to the south west measured to the nearside kerblane which is considered acceptable.

Swept Path Details

The latest Highways Technical Note (HTN) includes 2 no. extracts of swept path details indicating a large truck (unknown size) and a car (unknown size). The truck is shown entering the proposed access from the south westerly direction whilst a car exits in the south westerly direction. The same truck is shown exiting the proposed access in the south westerly direction whilst a car (unknown size) enters from the north easterly direction.

These extracts appear to have been taken from the swept path drawings referenced below and contained within Appendix TN1. However, neither the car nor its swept path tracking is shown on the corresponding drawing.

The applicant should therefore clarify whether the tracking illustrated within the HTN is consistent with the drawings contained in Appendix TN1 and confirm whether a car has been tracked passing the rigid vehicle. If such an assessment has been undertaken, the relevant swept path drawing(s) should be provided and clearly identify the vehicle types and dimensions used in the analysis.

No swept paths of a car are indicated or details of how such vehicles pass each other simultaneously up to the proposed commercial units have been included. The LHA recommends this detail is included on revised swept path plans.

The latest Swept Path Plan are as follows:-

Drg. No.	002	Vehicle:	16.5m HGV
Indicates vehicle entering access from the south west and vehicle exiting access to the south west.			

Drg. No.	003	Vehicle:	10m Rigid HGV
Indicates vehicle entering access from the south west and vehicle exiting access to the south west.			

Drg. No.	004	Vehicle:	16.5m HGV
Indicates vehicle entering access from the north east and vehicle exiting access to the north east.			

Drg. No.	005	Vehicle:	10m Rigid HGV
Indicates vehicle entering access from the north east and vehicle exiting access to the north east.			

The HTN indicates that it is unlikely that the site will be serviced by large articulated HGVs.

The submitted swept path details do not indicate how larger vehicles (HGVs) and a large car (5m long) will access site simultaneously up to the proposed commercial units. However, it would appear evident from the information submitted to date that larger HGVs / cars will be unable to access the site simultaneously to the proposed units given the horizontal alignment of the access.

On this basis, any larger vehicles visiting site will need to be limited in size. This can be controlled by a Service Delivery Management Plan. In order to determine the maximum size of vehicle permitted at the site, **the LHA recommends the applicant provides appropriate swept path details of a reduced size delivery vehicle / van plus car accessing the site simultaneously up to the proposed units. All inbound & outbound movements in both directions will need to be provided on separate plans.**

Any gates at the proposed access will need to setback a suitable distance from the adjoining highway dependent on the maximum size / length of delivery vehicle proposed (to be determined by appropriate swept path details).

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

The previously submitted plan indicates the swept path movements of a 9.2m long tractor plus trailer turning within the site. However, no details (appropriate swept paths) of how it enters and exits the proposed agricultural access have been provided with the latest submission. **The LHA recommends these details are provided.**

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.

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.

The extract of Highways Plan (Drg. no. 77362/RJC/004 Rev F) included in the latest HTN 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 and indicated on a revised layout plan.**

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 99m. However, after further consideration, it is concluded that this secondary

agricultural access is an existing access which will benefit from significant improvements and could have previously generated a significant number of vehicle movements.

Parking & Turning Provision

The previously submitted buildings comprised a total floor area of 2334m² gfa. The latest submitted HTN & "Photos of Existing Buildings" statement refers to buildings A to E now comprising a total floor area of 1056m² gfa.

Adequate parking and turning provision will need to be provided for the proposed 5 no. commercial units. The LHA previously recommended 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 previously submitted plan indicated the provision of 37 spaces in total for the 5no. commercial units.

Based on the worst case scenario, LPGN 16 - Class B1 use would require a maximum of 1 car space per 30m² gfa. If all units (1056m² gfa) were Class B1 use then the maximum parking requirement would equate to 35 spaces. The latest HTN indicates that 37 spaces will be provided which is considered acceptable. It is noted that none of the spaces indicated on the previously submitted layout plan (Drg No. 77362/RJC/003 Rev E) are indicated as complying to mobility standards. LPGN 16 requires a minimum 10% of parking spaces to be provided to mobility standards. **The LHA recommends the applicant addresses this issue on a revised layout plan.**

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 (Drg No. 77362/RJC/003 Rev E). 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 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.

Cycle Parking / Shelter

Adequate cycle parking / shelter provision will need to be provided at the development site in accordance with LPGN 16 / Active Travel Act Guidance. No details of appropriate cycle parking stands plus shelter appear to have been provided. This detail could be requested via a suitable planning condition.

Traffic Generation

Commercial Units

The applicant has submitted revised TRICS assessments for both B2 (Industrial Unit) and B8 (Warehousing) uses in response to the LHA previous comments regarding the suitability of the comparator sites and trip generation assessment. The revised assessments utilise smaller employment sites of a scale broadly comparable to the proposed development and are based upon more recent survey data.

Notwithstanding the above, a number of limitations remain within the submitted assessment.

Firstly, whilst the proposal seeks flexible employment use, no separate trip generation assessment has been provided for all potential occupiers that could operate from the units. The assessment is limited to B2 Industrial Unit and B8 Warehousing uses.

Secondly, whilst the revised TRICS databases are considered an improvement on those previously submitted, some of the selected survey sites are not wholly representative of the application site. In particular, the B8 assessment includes a survey site located within Donegal, Republic of Ireland, and a site located within Wandsworth, London, both of which are considered to have notably different characteristics to the rural location of the application site in Wrexham. Furthermore, the selected databases comprise a mix of suburban, edge-of-town and neighbourhood centre locations rather than exclusively rural employment sites.

Thirdly, the assessments have been derived from relatively small sample sizes, comprising six B8 sites and seven B2 sites. Whilst this is not unusual for developments of this type and scale, the limited sample size reduces the overall robustness of the assessment and increases the influence of individual sites on the resultant trip rates.

Despite these limitations, a review of the submitted TRICS outputs indicates that the B2 Industrial Unit assessment generates higher peak hour traffic flows than the B8 Warehousing assessment. The submitted trip generation assessment adopts peak periods of 08:00-09:00 and 17:00-18:00 and indicates that the B2 scenario would generate approximately seven two-way vehicle movements during the weekday AM peak hour and two two-way vehicle movements during the weekday PM peak hour, compared with approximately six and two two-way vehicle movements respectively under the B8 scenario.

However, a review of the TRICS outputs contained within Appendix TN3 identifies that the peak hours for each land use differ from those presented within the Technical Note. In particular, the PM peak hour for both the B2 and B8 land uses is shown to occur between 16:00-17:00 rather than 17:00-18:00 as reported.

Notwithstanding this technical discrepancy, the Local Highway Authority is satisfied that, even when adopting the higher trip rates associated with the B2 Industrial Unit scenario, the level of traffic generated by the proposed development would remain modest. Accordingly, the Local Highway Authority raises no objection on trip generation grounds in this instance, notwithstanding the inaccuracy identified within the reporting.

Whilst the Highway Authority has reservations regarding certain elements of the TRICS site selection, the predicted traffic generation remains extremely low. As such, even allowing for a degree of variation in the selected trip rates, the resulting traffic flows would remain minimal and would not materially alter the conclusions of the highway assessment. The proposal is forecast to generate only a small number of additional vehicle movements during the peak periods and would not be expected to result in a material impact on the operation and capacity of the surrounding highway network.

On balance, the LHA is satisfied that the submitted B2 trip rates provide a sufficient basis for assessing the traffic impacts of the proposal and is prepared to accept the assessment in this instance.

Existing Agricultural Activity

As previously indicated, it is concluded that the secondary (southerly) agricultural access is an existing access which will benefit from significant improvements and could have previously generated a significant number of vehicle movements.

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, the LHA recommends a condition for a SDMP to control the type/ size / frequency of delivery vehicles to the site. The latest HTN indicates that only car / smaller HGVs / vans will typically visit the proposed commercial units. As previously indicated, the LHA recommends the applicant provides appropriate swept path details of a reduced size delivery vehicle / van plus large car accessing the site simultaneously up to the proposed 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

In conclusion, the LHA request the following information:-

- Swept Path Details

The latest Highways Technical Note (HTN) includes 2 no. extracts of swept path details indicating a large truck (unknown size) and a car (unknown size). The truck is shown entering the proposed access from the south westerly direction whilst a car exits in the south westerly direction. The same truck is shown exiting the proposed access in the south westerly direction whilst a car (unknown size) enters from the north easterly direction.

These extracts appear to have been taken from the swept path drawings referenced below and contained within Appendix TN1. However, neither the car nor its swept path tracking is shown on the corresponding drawing.

The applicant should therefore clarify whether the tracking illustrated within the HTN is consistent with the drawings contained in Appendix TN1 and confirm whether a car has been tracked passing the rigid vehicle. If such an assessment has been undertaken, the relevant swept path drawing(s) should be provided and clearly identify the vehicle types and dimensions used in the analysis.

No swept paths of a car are indicated or details of how such vehicles pass each other simultaneously up to the proposed commercial units have been included. The LHA recommends this detail is included on revised swept path plans.

The submitted swept path details do not indicate how larger vehicles (HGVs) and a large car (5m long) will access site simultaneously up to the proposed commercial units. However, it would appear evident from the information submitted to date that larger HGVs / cars will be unable to access the site simultaneously to the proposed units given the horizontal alignment of the access.

On this basis, any larger vehicles visiting site will need to be limited in size. This can be controlled by a Service Delivery Management Plan. In order to determine the maximum size of vehicle permitted at the site, **the LHA recommends the applicant provides appropriate swept path details of a reduced size delivery vehicle / van plus car accessing the site simultaneously up to the proposed units. All inbound & outbound movements in both directions will need to be provided on separate plans.**

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

The previously submitted plan indicates the swept path movements of a 9.2m long tractor plus trailer turning within the site. However, no details (appropriate swept paths) of how it enters and exits the proposed agricultural access have been provided with the latest submission. **The LHA recommends these details are provided.**

- **Proposed Agricultural Access (SW)**

The LHA recommends any existing vehicular accesses / gates located either side of the improved access are permanently closed up and indicated on a revised layout plan.

- **Parking & Turning Provision**

Based on the worst case scenario, LPGN 16 - Class B1 use would require a maximum of 1 car space per 30m² gfa. If all units (1056m² gfa) were Class B1 use then the maximum parking requirement would equate to 35 spaces. The latest HTN indicates that 37 spaces will be provided which is considered acceptable. It is noted that none of the spaces indicated on the previously submitted layout plan (Drg No. 77362/RJC/003 Rev E) are indicated as complying to mobility standards. LPGN 16 requires a minimum 10% of parking spaces to be provided to mobility standards. **The LHA recommends the applicant addresses this issue on a revised layout plan.**

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.. This detail needs to be provided.

Cycle Parking / Shelter

- **Adequate cycle parking / shelter provision will need to be provided at the development site in accordance with LPGN 16 / Active Travel Act Guidance. No details of appropriate cycle parking stands plus shelter appear to have been provided. This detail could be requested via a suitable planning condition.**

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 Harratty on Tel: 01978 729761.



Contracts & Engineering Manager

On behalf of Chief Officer, Environment & Technical