

Our ref: P22015

7th October 2026

Planning reference: P/2022/1052
Highways Development Control
Wrexham County Borough Council

RE: Dragon Packaging, Wrexham Industrial Estate

Dear Jenni

We write on behalf of FI Real Estate Management in response to your consultation dated 10th April 2025 regarding the proposed warehouse extension at Dragon Packaging. Your concern is that heavy goods vehicles (HGVs) may have to wait on surrounding roads if sufficient space is not available within the site.

To reiterate, and for absolute clarity, the proposed extension is intended to improve the efficiency of the existing Dragon Packaging operation. It will provide sufficient internal space for storing, receiving and dispatching goods, so that the existing flow of goods can be organised and managed more effectively. The need for this additional space arises from the limitations of the current warehouse and service yard arrangements.

At present, trailers in the yard are used to store goods because there is insufficient space inside the warehouse. This occupies space needed for vehicle circulation and makes accessing and handling goods less efficient. Bringing more of this storage inside the building will reduce reliance on those trailers and improve the management of existing HGV movements.

An earlier traffic survey of Dragon Packaging recorded an average of 49 HGV movements per day, including both arrivals and departures. As set out in our technical note dated 30th October 2024, HGV activity is expected to remain close to this existing level. Again, the proposals are intended to improve the handling of existing deliveries and collections, rather than increase the number of HGV movements to and from the site.

Prime also tested what would happen if HGV activity increased in proportion to the additional warehouse floorspace. That calculation gave 102 movements per day and was used to check the impact on the road network. It was a hypothetical test, rather than Dragon Packaging's expected level of activity.

The Council's earlier estimate of approximately 12 HGVs on site at one time was based on that higher traffic scenario. It should therefore not be treated as a confirmed need for 12 spaces. Providing more warehouse storage does not automatically mean that deliveries and collections will double.

Our earlier submission identified on-site capacity for eight HGVs, while the Council's calculation using existing average activity indicated approximately six HGVs on site at one time. Previously submitted swept path drawing P22014-002A also demonstrates ample space for HGVs to manoeuvre safely and efficiently within the service yard with the proposed extension in place. Subsequent minor changes, including a virtual footway and additional cycle parking, do not reduce the available manoeuvring space or affect the movements demonstrated.

The service yard remains generous in size and already accommodates the existing operation without HGV queues extending onto the public highway, despite parts of the yard being occupied by storage trailers. The extension will remove the need to use trailers for storage, freeing this space for circulation and servicing. With no material increase in HGV activity anticipated, this will improve existing operations and provide additional space for internal waiting should it ever be needed.

Prime supports a Service Management Plan, secured by a planning condition, to set out how deliveries and collections will be booked and managed so that lorries have space within the site and do not wait on surrounding roads.

We ask that the scheme be assessed as an improvement to the existing operation and that the HGV concern is resolved through confirmed on-site capacity and agreed servicing arrangements.

Yours sincerely,

ANTHONY MORLEY
ASSOCIATE