

P/2023/0497: Land North of Bryn Lane - Car Parking Justification Note

Introduction

1. This note has been prepared in response to comments raised by the Wrexham County Borough Council's (WCBC) highways department in relation to the proposed car parking provision on Land North of Bryn Lane (also known as Utopia City). The note covers the proposed parking provision and justification on why this is acceptable in the context of planning policy and real-life context within the Wrexham Industrial Estate. It should be read alongside the B8 and B2 layouts produced by SGP.
2. Planning application P/2023/0497 is a hybrid application seeking full permission for the demolition of existing buildings and the severable and phased erection of Class B1c/B2/B8 development with ancillary infrastructure (including substation and access); outline permission for the severable and phased construction of Class B1c/B2/B8 development with ancillary Class B1a floorspace; retail, drive thru, hotel, petrol station (Classes A1/A3/C1/Sui Generis) and associated infrastructure (all matters reserved).
3. The Applicant is Net World Sports (NWS).

Planning Policy Position

4. The Local Development Plan for Wrexham was adopted in December 2023. However, a legal challenge was raised on whether that decision was sound. This ultimately resulted in the de-adoption of the plan which means the current development framework for Wrexham consists of the 2011 Unitary Development Plan (UDP) and Future Wales: The National Plan 2040 (2021). A key material consideration is Planning Policy Wales (2024).
5. Policy T8 of the Unitary Development Plan states the following:

'Development granted planning permission will be required to provide vehicle parking spaces either on Site or nearby, in accordance with the Council's current parking standards. Special regard will be paid to the following factors as appropriate –
 - a) *The availability of public transport nearby;*
 - b) *Proximity to public car parking;*
 - c) *Proximity to local services and facilities;*
 - d) *Road safety hazards and amenity considerations arising from on-street parking in the vicinity of the Site.'*
6. The explanatory text for Policy T8 recognises that full compliance with parking standards may neither be practicable nor appropriate (e.g. where there may be insurmountable access, amenity, space or layout constraints).

Parking Standards

7. Local Planning Guidance Note No.16 explains the parking standards that WCBC applies to new development. The parking standards are reviewed on occasion and are a material consideration in the determination of planning applications.
8. The adopted parking standards for WCBC are maximum standards for each land use category. In accordance with national policy the Council has no minimum parking requirements. Note 16

sets out that in instances where the amount of parking provided is below that of the maximum, the Council will need to be satisfied that this is appropriate for the likely level of demand.

9. Local Guidance Note 16 sets out the B2/B8 parking standards as follows:

Type of Development	Parking Standard
B2 General Industry	1 car space per 50m ² gross floor space
B8 Storage and Distribution	1 car space per 100m ² gross floor space

10. The parking standards for WCBC are reviewed occasionally. During the latest review in 2018, the parking standards for B2/B8 use do not appear to have changed with the focus within the update being providing guidance on HMOs. Therefore, the existing car parking standards for Use Classes B2 and B8 may not to have been reviewed by WCBC since 2005. These may not accurately reflect modern day business operations and their requirements for access via private vehicles.
11. Within WCBC's Parking Standards, it is noted that Use Class B1 (Business and light industry) has a more restrictive car parking requirement of 1 car per 30m². However, Use Class B1 also covers offices and research and development facilities. Offices in particular are likely to require greater car parking (especially if they were in an out-of-town location).
12. For Utopia City, planning permission is only sought for Use Class B1(c) which covers "industrial process (which can be carried out in any residential area without causing detriment to the amenity of the area)". The Site is a purpose-built industrial estate, albeit with a small number of residential properties to located to the north-west. Therefore, it is less likely that a genuine B1(c) use will come forward.
13. We would ask WCBC to consider that an acceptable car parking provision for a Use Class B2 (General Industry) use is also appropriate for Use Class B1(c) use in this context. Therefore, there is no requirement for any conditions requiring further information in advance of an occupier under this use class coming forward.

Evidence

14. Recent evidence surrounding the role of digitisation within the industrial and logistics sector suggests that due to recent progress in AI and robotics particularly within the e-commerce sector has resulted in efficient inventory management, autonomous or driver-less last mile delivery. With these systems becoming more advanced, it is likely that they will become key parts within the manufacturing industry within the coming years. This may result fewer workers needed within the manufacturing industry compared with historic requirements, especially if it is more economically viable to use AI or robotics.
15. To support preparing this note, NWS have engaged with other Use Class B2 businesses within the Wrexham Industrial Estate to understand their existing parking requirements. This review has allowed us to understand the real-life context to parking requirements for B2 uses within Wrexham Industrial Estate. In turn, we can therefore justify that while some proposed units have not met the maximum parking standards, this should not be considered to be a detrimental issue.

16. Businesses within Wrexham Industrial Estate have provided the following information relating to their car parking provision compared to their floorspace. These businesses are either advanced manufacturing businesses with market leading operations or more traditional manufacturers with office and manufacturing requirements on-site.

Floorspace of Development within Wrexham Industrial Estate	Required Number of Parking Spaces using WCBC standards (Use Class B2)	Actual Number of Car Parking Spaces
25,000 sq. ft / 2,322 sq. m	46	45
70,000 sq. ft / 6,503 sq. m	130	104
26,909 sq. ft / 2,500 sq. m	50	36

17. As demonstrated above, there are comparable businesses within the Wrexham Industrial Estate with less parking available compared to standards set out in policy. Nevertheless, they are operating successfully without any issues pertaining to on-street car parking or capacity.
18. In addition, NWS's existing headquarters site has 217 car parking spaces. As part of an assessment undertaken for a planning application for an ancillary industrial facility on the site, NWS' Transport Consultant (Cora IHT) projected that the peak demand is 181 spaces (83% capacity) resulting in 36 spare spaces on site.
19. NWS confirms that this is typical of the car parking usage over the last year and 181 spaces is the maximum accumulation. NWS are also a good precedent for the type of logistics (Use Class B8) company who may be attracted to Utopia City in the future. Operating on an international scale, the business includes both traditional 'warehouse' operators working alongside professionals in technology, marketing, and digital communication.

Current Car Parking Provision & Modelling Assumption

20. NWS has sought to respond to WCBC's comments and have developed an alternate layout showing how a 'B2' car parking provision could be accommodated across the detailed elements of the planning application. The layouts show 10% of car parking spaces are dedicated to Electric Vehicle Charging points and an appropriate amount of disabled car parking is proposed.
21. The exception is Unit 2 which has been designed to accommodate a logistics (B8) operator. Noting this, NWS would accept that a planning condition can be applied which limits this unit to solely operate as Use Class B8, unless further details are sought from the LPA.
22. The proposed parking for each unit that is being applied for within the full planning application is outlined below.

Unit	Use	Size (sq.m)	B8 Layout Spaces	B8 Disabled Spaces	B8 Total	WCBC Standard for B8	%	B2 Layout Spaces	B2 Disabled Spaces	B2 Total	WCBC Standard for B2	%
2	B8 only	33,177	323	14	337	332	101%	N/A	N/A	N/A	N/A	N/A
3	B2 / B8	2,063	21	2	23	21	109%	40	4	44	41	107%
4	B2 / B8	2,063	20	2	22	21	104%	38	4	42	41	102%
5	B2 / B8	2,063	20	2	22	21	104%	38	4	42	41	102%

Unit	Use	Size (sq.m)	B8 Layout Spaces	B8 Disabled Spaces	B8 Total	WCBC Standard for B8	%	B2 Layout Spaces	B2 Disabled Spaces	B2 Total	WCBC Standard for B2	%
6	B2 / B8	5,712	49	3	52	57	91%	95	6	101	114	88%
7	B2 / B8	10,293	95	5	100	103	97%	185	10	195	206	94%
14	B2 / B8	854	9	1	10	9	111%	9	1	10	17	58%
15	B2 / B8	1,319	16	1	17	13	130%	16	1	17	26	65%
16	B2 / B8	3,879	38	2	40	39	102%	74	4	78	78	100%

23. As a head-line summary, when compared against WCBC's standards nearly all units achieve close to or above 90% car parking provision within the B8 or B2 layout. This is considered an appropriate provision, especially noting the justification section below. The exception are Units 14 and 15 in the B2 layout scenario where only 58% and 65% when compared against the standards.

24. NWS' architect, SGP, has reviewed these units to establish whether further car parking can be provided in the B2 layout. However, due to their smaller nature and limited yard space, it is not possible to increase car parking without compromising their operability. Nevertheless, it is still considered that this provision is appropriate.

25. It is especially noted that the current pipeline of smaller units within Wrexham Industrial Estate which are available to purchase or lease is in short supply. These mostly comprise dated units which may not meet the need for modern day operators. There is a lack of good quality smaller units either currently available or in the pipeline.

26. Typically, smaller units within the industrial estate tend to let quicker. For example, FI Real Estate's completed a scheme in the Wrexham Industrial Estate in 2022 which comprises seven units between 3,357 sq. ft and 9,806 sq. ft. This is almost fully let, with only two units understood to be available. Therefore, alongside the justification below, there are economic grounds for supporting the proposed car parking provisions.

General justification

27. While the majority of units proposed meet the parking standards set by WCBC, some do not. These includes Units 6 (91% of B8 standards and 88% of B2 standards), 7 (97% of B8 standards and 94% of B2 standards), 14 (64% of B2 standards) and 15 (69% of B2 standards).

28. While there are some deviations from the maximum parking standards, as set out above, they are deemed to be acceptable in the real-world context. This conclusion has been reached by reviewing other businesses within Wrexham Industrial Estate to understand their parking provision and requirements, alongside the following factors.

Maximum Parking Standards

29. The current parking standards that have been set by WCBC represent 'maximum' numbers considered acceptable for new car parking spaces. Maximum parking standards are intended to prevent oversupply, reduce car dependency and protect urban land. By providing fewer than the maximum allowable number of parking spaces is not only acceptable, but also often the more efficient, sustainable and economically sensible choice for developers.

30. Evidence from nearby businesses within Wrexham Industrial Estate suggests that due to work place behaviour, maximum standards are above real parking demand. Therefore, it is acceptable to assume that developers, such as NWS, are well-positioned to determine the appropriate level of provision.

Age of Guidance / Change in working habits

31. As discussed earlier in this note, the current parking standards for B2/B8 were adopted by WCBC in 2005 and it does not appear that any amendments have been made since. In the 21 years since the adoption of these standards, ways of working and travel requirements have drastically changed.
32. There has been a large shift in working patterns since the Covid-19 pandemic. The way people work and travel for work has permanently shifted, with remote and hybrid working being widespread across all major industries. In addition, shift working continues to be an important component of manufacturing and logistic industries meaning that the 'full' workforce may not necessarily be on-site at the same time.
33. This change in working style has significantly reduced commuting needs, as well as a shift in on-site working. This has led to notable reductions in vehicle miles travelled and a change in work travel patterns, with more flexibility throughout the day for commuters to travel at more varied times.
34. When the parking standards were set in 2005, it was a different context, with stricter working hours, fewer opportunities to work from home, and a higher dependency on private vehicles. Therefore, some deviation from these standards should be allowable as these may no longer reflect the parking requirements for businesses.

Travel Plans

35. It is anticipated that a Travel Plan will be requested by WCBC as part of a planning condition for both the detailed and outlined elements of the application.
36. The purpose of a Travel Plan is to promote a sustainable and active travel behaviour change. This promotion typically results in a reduction in car use as they encourage people to choose sustainable modes of travel.
37. Planning Policy Wales (2024) Technical Advice Note 18 (TAN 18) (2007) states that 'travel plans should relate to targets for the reduction of road traffic and the promotion of walking, cycling and public transport contained in the RTP'.
38. With the increased encouragement of active travel, there is less of a requirement for car parking spaces. In turn, this encourages sustainable travel more, as there is limited parking available.
39. Future occupiers will need to comply with any conditions attached to the approval notice requesting a Travel Plan to be submitted.

Traffic Regulation Order

40. A Traffic Regulation Order (TRO) is a legal instrument that allows Councils to manage how roads are used by vehicles and pedestrians. This is exercised through various measures such as setting speed limits, parking restrictions and one-way systems.

41. In this instance of this application, the Council could look to introduce a TRO on the development site if further action is required to manage unacceptable impacts from overspill car parking. As an example, WCBC could install double yellow lines to restrict on-street car parking if there were problem units or areas where this was an issue for highways safety.
42. It is understood that there is not a wider issue with 'on street' car parking within the wider Wrexham Industrial Estate.

Active Travel / Cycleways

43. The proposed development includes cycleways to encourage active travel, including cycleways integrated with the road network. The road and cycle network has been designed to be large enough to accommodate safe movement around Utopia City.
44. In addition, a key objective of the Wrexham and Flintshire Investment Zone is investment in reshaping transport infrastructure to make it easier for people to travel to work at key industrial sites (including people living in areas with high deprivation). This will include the Wrexham Industrial Estate.
45. The Applicant would be willing to have discussions with WCBC in regard to providing an active travel contribution, noting that a similar requirement was made for the Kingmoor development which was recently approved in the Wrexham Industrial Estate.

Conclusion

46. In conclusion, the majority of the proposed development aligns with adopted parking standards set by WCBC in either a B8 or B2 layout; however, a small number of units do not meet the maximum parking standards. These discrepancies are minor.
47. When comparing the proposed provision with nearby businesses on the industrial estate, a strong case can be made for the reduced parking levels. This note has presented real life examples of B2 Units within Wrexham Industrial Estate which demonstrate that not meeting the maximum parking standards does necessarily mean that businesses are unable to function or create wider parking issues in the area.
48. As discussed within this note, recent changes in travel requirements has resulted in less people being required to travel to a main hub such as an office or warehouse. The fast-moving development of technology, shift-working, and work from home trends is resulting in less reliance on the car network.
49. The proposed number of car parking spaces throughout the proposed development is compliant with either maximum standards or tried and tested every day requirements for car parking. Overall, the provision is considered appropriate.