

MEMORANDUM



From:	Chief Officer, Environment & Technical	To:	Chief Officer Economy & Planning
		FAO:	Philip Mullineux
Our Ref:	ET/DC/AO/P/2023/0497	Your Ref:	P/2023/0497/R4
Date:	15/05/2026		

TOWN AND COUNTRY PLANNING ACT 1990

Application Ref: 2023/0497 - Land North of Bryn Lane, Wrexham Industrial Estate. Hybrid application seeking: Full planning permission for the erection of buildings for class. B1, B2 & B8 use and formation of vehicular access and outline planning permission for the erection of buildings for class B1, B2 and B8 use and retail, drive thru, hotel and petrol filling station classes A1, A3, C1 and sui generis and associated infrastructure (all matters reserved).

Following previous submissions of significant volumes of additional information, scheme updates and alternative proposals and the LHA review of these proposals, further additional information has been provided.

The following comments are made in response to the additional information submitted by the applicant in February, March and May 2026.

Parking Provision for the Areas of the Site Covered by the Full Planning Application:

The Council's LPGN 16 sets out the maximum parking standards to be applied to development proposals. It is noted that these are maximum standards, but as clearly set out in LPGN 16, where the amount of parking provided is below the maximum, the LHA will need to be satisfied that this is appropriate for the likely level of demand, without undermining requirements for inclusive access. LPGN 16 also states that development will not be permitted if there is insufficient parking on site and where as a result this will cause or increase highway problems.

A Car Parking Justification Note has been submitted alongside the updated site proposals. This note seeks to justify the proposed parking provision in general, but also in relation to the potential B2 or B8 split in land uses.

When reviewing parking proposals, the LHA considers the proposals against the potential for non-car travel to a given site where less than maximum provision is proposed. The LHA have accepted local applications with less than 100% provision against LPGN 16, but this has been justified on the basis of supporting measures. The parking justification note provides generic reasons why less than maximum parking should be accepted. Whilst the LHA does not disagree with these, given no end users are identified, parking provision must be robust to cater for as many future uses and users as possible. Whilst there may have been a shift to technology and lower work forces in some instances, in others and as can be seen in locations around the Industrial Estate, many organisations are still labour intensive.

The note goes on to present a breakdown of proposed parking provision, by unit, on the site. Given the possibility of B2 or B8 use, the LHA must consider the possibility of B2 uses given this has the higher parking requirement. The proposals identify that of the nine units presented, all but two will provide c.90%+ provision against the maximum. This is acceptable to the LHA. However, two units

(14 and 15) present 58% and 65% provision respectively and this is not acceptable. Whilst these are relatively smaller units, this under provision of parking raises concerns of overspill onto the highway and the potential accessibility, operational and road safety impacts of this.

The parking note in this regard suggest the Council could look to introduce a Traffic Regulation Order (TRO) if action is required to “*manage unacceptable impacts from overspill car parking*”. whilst technically correct, this should not fall on the Council to introduce – sufficient parking should be designed into the scheme to avoid this, but even if deemed necessary, it should be to applicant to fund such a TRO, not the Council.

It has not been demonstrated how articulated HGVs can safely enter and egress each unit in a forward gear, especially given that in many cases the parking layouts appear to restrict HGV movements. For example, Unit 6 in the B2 configuration, the car parking is located on the area a HGV would use to reverse in to the loading bay. Also for example, Unit 16 (B2) if the yellow car parking spaces are occupied, articulated HGVs would be unable to access the loading area. Also for units 14 and 15 if all parking spaces were occupied (or even only some occupied) it has not been demonstrated that an articulated HGV would be able access the loading bays. The LHA are concerned that these operational issues would reduce the practical and usable parking provision across much of the units and result in overspill parking on the highway and result in potential accessibility, operational and road safety impacts. Given the significant focus on acceptable swept-paths of HGVs at other locations, it is a concern that such swept-path drawings have not been provided.

Policy 12 of Future Wales requires 10% of all parking spaces as a minimum to have EV charging points. As no supporting narrative has been provided to explain the masterplan and the provision included, it is difficult to interpret the plan, but it appears whilst some EV provision has been included, this does not meet the Future Wales requirement.

The LHA cannot therefore accept the parking proposals as presented, given concerns over potential accessibility, operational and road safety impacts.

Active Travel Provision:

The LHA has repeatedly stated that the internal highway layout should be designed to provide segregated cycle provision on the main spine road (as a minimum) to meet the principles and guidance set out in the Welsh Government Active Travel Act (ATA). The latest masterplan still appears to show on-carriageway advisory cycle lanes. The LHA has stated a number of times that such provision will not be acceptable.

The applicant has sought to justify this provision by engaging with local cycling groups, suggesting segregated provision is harder to use and less likely to be used than on-carriageway advisory cycle lanes. The ATA and the principles behind it are to encourage those who do not cycle, or those who are put off cycling by providing safer facilities, not to cater for confident and experienced cyclists.

The latest layouts also show non-standard cycle lane arrangements at all access junctions, where the cycle lane widens into the carriageway. These details are not acceptable as this creates conflict points between cyclists and vehicles.

Given statements made in the submitted information regarding the aspiration for high sustainability and that the principles of the development are to encourage Active Travel, this insistence on advisory cycle lanes is not supportive of these aims. It is difficult to understand the resistance of the applicant to show protected cycle provision as the various highway cross-sections that have been referred to could accommodate an ATA compliant solution without the need for impact on adjacent land. Suggestions have been made that Active Travel provision could be delivered at a later stage. This is also not acceptable as travel behavior is set early on and retrospective provision of active travel infrastructure will have some but limited benefit.

Given the nature of the land use(s) there will be a high proportion of HGVs and therefore protected cycle provision is essential. In addition, it is highly likely (and whilst un-desirable), HGVs will park on

carriageway while they await access to units or to take rest breaks. If on-carriageway cycle lanes are provided, these would then be occupied by parked HGVs, forcing cyclists into the general traffic lane and into conflict with vehicles and particularly HGVs.

Active Travel is not just cycling, but walking also. Despite previous requests by the LHA, the latest masterplans provide no indication of how pedestrians will be accommodated other than on footways. Numerous side road junctions are present with no crossings shown, again this does not comply with ATA, or provide any provision in such a HGV heavy environment. The accesses to several units show a footway terminating with no onward dedicated pedestrian access into the unit(s). This suggests pedestrians are then expected to mix with vehicles and HGVs. This is not acceptable.

Given the above issues, the LHA and the Council's Active Travel officer cannot accept the proposals as shown.

On-Site Highway Layout:

No clear proposals have been presented to demonstrate the strategy in terms of where internal highway is proposed for adoption by the LHA, despite requests being made. This is an essential element in understanding and agreeing to the detail of the proposals for the full application area.

Offsite Junction Mitigation:

Whilst progress has been made on an agreed solution at the junction of the A5150 / A534 / Holt Road Roundabout (Golf Club Roundabout), there remains no progress on an acceptable proposal at the A534 / Industrial Estate Road / Sandy Lane / Borrass Hall Lane roundabout. Several iterations of proposals have been submitted for this junction, but none have provided an acceptable solution. The latest information and plans therein are still not acceptable to the LHA.

The latest information offers two options, either accepting the latest proposal even though as the applicant states it *"responds to the majority of WCBC comments... and can be refined through detailed design"*. Or contributing towards the KSS2 North Mitigation scheme.

One of the issues the LHA have with the proposed mitigation, is the concern that it may not be deliverable within the highway boundary and that as shown it is not safe – therefore it cannot be pushed back to the detailed design stage. **The deliverability and feasibility of a solution must be demonstrated prior to permission. This has still not been done.**

It is not the role of the LHA to decide which mitigation option should be taken forward. This is a decision for the applicant to make, given the financial commitments it will involve. Furthermore, neither option has been demonstrated to acceptably mitigate the application impact. The first option as noted above is not acceptable from a design perspective. The KSS2 North proposal at this location, whilst tested at a high level for the now withdrawn LDP, has not been tested at a detailed level with the current application parameters (which for this application have changed since the time of the LDP assessments).

Junction Assessment Methodology:

The latest information also seeks to re-visit the assumptions made on capacity assessments, that the LHA understood had been agreed and accepted by the applicant's team. Specifically this relates to the assessment of the key junctions in the base year. As originally presented, these models did not reflect existing queuing and operational behaviour and the LHA were unable to accept these as a suitable base on which to forecast future operation (if the base models weren't accurate there can be no confidence in future year models being accurate). The applicant's own queue surveys demonstrated that the base models were under-representing observed queuing.

It was agreed at the time that these base models should be calibrated to better reflect this observed operation. In the latest information it appears that the applicant's team are now suggesting that this is not suitable and results in over-estimated queuing in the future year. The approach requested by the LHA is in line with standard junction modelling practice and the LHA cannot accept the results of future year assessments which are not based on accurate base models.

The LHA cannot accept the current proposals for the junction of the A534 / Industrial Estate Road / Sandy Lane / Borrás Hall Lane roundabout as they have not been demonstrated to be safe, deliverable or to mitigate the impacts that the wider assessment demonstrates will occur.

Summary:

A significant volume of material has been submitted to and reviewed by the LHA, requiring significant time and input from officers. The LHA has been proactive in responding to this information, in dialogue with the applicant team and the numerous meetings held.

The submitted information in many cases lacks/lacked the technical accuracy required and this has contributed to a drawn-out review period and iterations of reviews and re-reviews that is significantly beyond that which would normally be expected, even for such a significant development proposal.

Given this, and that as noted in this response, there are numerous technical issues that are still to be addressed, the LHA considers that the gap between the current proposals and being able to support the application as too significant to accept.

The LHA considers that more than ample time and input has been provided to the application, but a solution has still not been achieved.

The LHA therefore has no option other than to issue a recommendation for refusal on the basis of a lack of suitable information being provided and specifically on the points raised in this response, which are summarised as follows:

- The LHA cannot accept the parking proposals as presented, given concerns over potential accessibility, operational and road safety impacts.
- The LHA cannot accept the proposals given concerns of the safety of pedestrians and cyclists, as the proposal do not comply with the Active Travel Act guidance. The lack of safe Active Travel provision also raises concerns over potential reliance on vehicle-based travel.
- The LHA cannot accept the current proposals for the junction of the A534 / Industrial Estate Road / Sandy Lane / Borrás Hall Lane roundabout as they have not been demonstrated to be safe, deliverable, or to mitigate the impacts that the wider assessment demonstrates will occur.

RWEdwards

Contracts & Engineering Manager

On behalf of the Chief Officer, Environment & Technical