

P/2023/0497 – Utopia City – Highways Comments

This schedule provides a response against the letter provided by WCBC Highways dated 15 May 2026.

N	Comment	Commentary																																																																																																																																		
1	Parking provision in full application area: <i>... 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 ...</i> <i>... 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.</i> <i>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.</i>	The Applicant believes there may have been confusion due to an older version of the Car Parking Justification Note (03 March) being uploaded to the portal by WCBC on 11 May 2026. The most recent version (18 March) of this document demonstrated that all units would deliver at least c. 90% of car parking provision required by WCBC’s standards. As part of responding to comments below, SGP (the applicant’s masterplanner) has confirmed that all units will continue to meet this threshold. Car parking numbers are included in updated layout drawings provided alongside this response. For ease, a summary is provided below. To reconfirm, the Applicant is willing to accept a condition restricting Unit 2 to Use Class B8 only. <table><tr><th>Unit</th><th>Use</th><th>Size (sq.m)</th><th>B8 Layout Spaces</th><th>B8 Disabled Spaces</th><th>B8 Total</th><th>WCBC Standard for B8</th><th>%</th><th>B2 Layout Spaces</th><th>B2 Disabled Spaces</th><th>B2 Total</th><th>WCBC Standard for B2</th><th>%</th></tr><tr><td>2</td><td>B8 only</td><td>33,177</td><td>323</td><td>14</td><td>337</td><td>332</td><td>101%</td><td>N/A</td><td>N/A</td><td>N/A</td><td>N/A</td><td>N/A</td></tr><tr><td>3</td><td>B2 / B8</td><td>2,063</td><td>21</td><td>2</td><td>23</td><td>21</td><td>109%</td><td>40</td><td>4</td><td>44</td><td>41</td><td>107%</td></tr><tr><td>4</td><td>B2 / B8</td><td>2,063</td><td>20</td><td>2</td><td>22</td><td>21</td><td>104%</td><td>38</td><td>4</td><td>42</td><td>41</td><td>102%</td></tr><tr><td>5</td><td>B2 / B8</td><td>2,063</td><td>20</td><td>2</td><td>22</td><td>21</td><td>104%</td><td>38</td><td>4</td><td>42</td><td>41</td><td>102%</td></tr><tr><td>6</td><td>B2 / B8</td><td>5,712</td><td>49</td><td>3</td><td>52</td><td>57</td><td>91%</td><td>95</td><td>6</td><td>101</td><td>114</td><td>88%</td></tr><tr><td>7</td><td>B2 / B8</td><td>10,293</td><td>94</td><td>5</td><td>99</td><td>103</td><td>96%</td><td>185</td><td>10</td><td>195</td><td>206</td><td>94%</td></tr><tr><td>14</td><td>B2 / B8</td><td>854</td><td>9</td><td>1</td><td>10</td><td>9</td><td>111%</td><td>18</td><td>2</td><td>20</td><td>17</td><td>117%</td></tr><tr><td>15</td><td>B2 / B8</td><td>1,319</td><td>16</td><td>1</td><td>17</td><td>13</td><td>130%</td><td>26</td><td>2</td><td>28</td><td>26</td><td>108%</td></tr><tr><td>16</td><td>B2 / B8</td><td>3,879</td><td>38</td><td>2</td><td>40</td><td>39</td><td>102%</td><td>67</td><td>4</td><td>71</td><td>78</td><td>91%</td></tr></table>	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%	6	B2 / B8	5,712	49	3	52	57	91%	95	6	101	114	88%	7	B2 / B8	10,293	94	5	99	103	96%	185	10	195	206	94%	14	B2 / B8	854	9	1	10	9	111%	18	2	20	17	117%	15	B2 / B8	1,319	16	1	17	13	130%	26	2	28	26	108%	16	B2 / B8	3,879	38	2	40	39	102%	67	4	71	78	91%
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2	Parking provision in full application area: <i>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 sweptpaths of HGVs at other locations, it is a concern that such swept-path drawings have not been provided.</i>	An updated masterplan with detailed layout in both the B2 and B8 scenarios has been produced by SGP. This is accompanied by tracking produced by Mode Transport which shows that articulated HGVs can safely enter and egress each unit from the estate roads in a forward gear. All manoeuvres in both the B2 and B8 scenarios are achievable within the service yard areas without impacting or overrunning the proposed car parking spaces. <table border="1"> <thead> <tr> <th>Unit</th><th>B8 Layout - Tracking drawing ref</th><th>B2 Layout – Tracking drawing ref</th></tr> </thead> <tbody> <tr> <td>2</td><td>J32-9525-PS-001 Rev A</td><td>N/A</td></tr> <tr> <td>3</td><td>J32-9525-PS-002 Rev A</td><td>J32-9525-PS-010</td></tr> <tr> <td>4</td><td>J32-9525-PS-003 Rev A</td><td>J32-9525-PS-011</td></tr> <tr> <td>5</td><td>J32-9525-PS-004 Rev A</td><td>J32-9525-PS-012</td></tr> <tr> <td>6</td><td>J32-9525-PS-005 Rev A</td><td>J32-9525-PS-013</td></tr> <tr> <td>7</td><td>J32-9525-PS-008 Rev A</td><td>J32-9525-PS-016</td></tr> <tr> <td>14</td><td>J32-9525-PS-006 Rev A</td><td>J32-9525-PS-014</td></tr> <tr> <td>15</td><td>J32-9525-PS-006 Rev A</td><td>J32-9525-PS-014</td></tr> <tr> <td>16</td><td>J32-9525-PS-007 Rev A</td><td>J32-9525-PS-015</td></tr> </tbody> </table> It should be noted that for smaller units, it is unlikely that regularly access via HGVs will be required and this should be taken into account, especially in the B2 scenario.	Unit	B8 Layout - Tracking drawing ref	B2 Layout – Tracking drawing ref	2	J32-9525-PS-001 Rev A	N/A	3	J32-9525-PS-002 Rev A	J32-9525-PS-010	4	J32-9525-PS-003 Rev A	J32-9525-PS-011	5	J32-9525-PS-004 Rev A	J32-9525-PS-012	6	J32-9525-PS-005 Rev A	J32-9525-PS-013	7	J32-9525-PS-008 Rev A	J32-9525-PS-016	14	J32-9525-PS-006 Rev A	J32-9525-PS-014	15	J32-9525-PS-006 Rev A	J32-9525-PS-014	16	J32-9525-PS-007 Rev A	J32-9525-PS-015
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3	Parking provision in full application area: <i>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.</i>	A 10% EVC provision had been shown on the drawings previously provided, although for clarity this has been more clearly identified.																														
4	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 updated masterplan and detailed layout drawings now show the following which meets the LHA's requirements: - A 3m off-carriageway, shared use pedestrian cycle-way on both sides of the road - An 8.3m carriageway (4.15m for each lane), proposed to allow additional clearance for larger vehicles used by potential future occupiers.																														
5	Active Travel Provision: 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.																															
6	Active Travel Provision: 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																															
		Noting comments about HGV parking on carriageway, it should be noted that as part of the outline planning element of Utopia City a lorry park is proposed which will have a positive																														

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	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.	effect across the Wrexham Industrial Estate and, more directly, on the Proposed Development as it is brought forward. This should be recognised as a highways benefit and reflected in the planning balance. In summary, this off-carriageway shared use provision addresses the points raised. The cycle provision no longer widens into the carriageway at the access junctions, which removes the conflict points previously identified. As cyclists are now physically separated from the running carriageway, any HGVs waiting on the carriageway would not obstruct the cycle route or force cyclists into the general traffic lane, and the proposed lorry park will further reduce the likelihood of HGVs waiting on the carriageway.
7	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 show, again this does not comply with ATA, or provide save 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.	The Applicant considers that previously submitted version of the masterplan (uploaded to the Council’s portal on 18/03) presents better position than reflected in the LHA response. However, within the updated masterplan and detailed layout drawings, they have sought to further strengthen pedestrian routes from the footway to each unit and introduced further crossing points. It is considered that there is a natural route for a pedestrian walking to any unit and the scheme is acceptable in terms of pedestrian active travel.
8	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.	The Applicant is considering all options; however, they are willing to privately maintain all roads within the internal highway should it not be possible to agree these are adoptable. The intention is to construct the highway to an adoptable standard, noting changes made to the latest version of the masterplan and detailed layout drawings. We do not believe this is a matter for WCBC to hold an objection to the development on.
9	Offsite Junction Mitigation ... 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. ...	An Off-Site Mitigation Technical Note produced by Cora IHT (dated 12 March 2026) and was uploaded to the portal on 18 March 2026. This was flagged again with WCBC on 19 May 2026. Fundamentally, this presents a signalised mitigation scheme which is considered to be appropriate. We believe the comments provided by WCBC on this matter relate to a previous issue of the Technical Note in February 2026. WCBC should confirm that this mitigation is acceptable.
10	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	An Off-Site Mitigation Technical Note produced by Cora IHT (dated 12 March 2026) and was uploaded to the portal on 18 March 2026. This was flagged again with WCBC on 19 May 2026. Cora IHT confirm that the position on modelling has been considered in this.

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	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.	We believe the comments provided by WCBC on this matter relate to a previous issue of the Technical Note in February 2026. WCBC should confirm that this point is resolved.