

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/R5
Date:	30/06/2026		

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 numerous previous submissions of information and proposals and a significant input from the Local Highway Authority (including 16 responses and five Consultation Responses), further information has been submitted in response to previously identified issues and requirements.

This consultation response addresses the following information submitted 18/06/26:

- Response to Highway Comments
- Parking Justification Note (further updated on 26/06/26)
- Swept-Path Drawings
- Amended Substation Site Plan
- Illustrative Masterplan (B2 and B8 variants)
- Offsite Mitigation Technical Note

Highway Comment Response Technical Note

The response note refers to confusion over the review of older versions of documents and plans. For the avoidance of doubt, this confusion has arisen following the applicant's team sharing superseded information with the WCBC Highways and Planning team for review immediately after the meeting on the 11/05/26 via email. This information was then uploaded to the planning portal. The confusion therefore results from this sharing of superseded material not from the Council's part.

Parking Justification Note (Updated)

As clearly stated in the last consultation response the Council's parking standards (as set out in LPGN 16) are maximum standards. Previous comments have been made by the LHA about earlier versions of the masterplan(s) showing a significant shortfall against these maximum standards. However, it should be emphasised that these are maximum standards not targets. The maximum standards are used to try and achieve a balance between ensuring practical provision whilst trying to not over provide parking and therefore encourage over reliance on vehicle-trip making. The latest masterplans for both B2 and B8 show a number of units with over 100% provision against the maximum standard. From a policy point of view over provision must be justified (as under provision must be). It is noted that the over provision is a not a significant number, but given particularly for the B2 masterplan, it appears additional car parking has been squeezed into areas that would not normally be considered for parking (given these are generally HGV manoeuvring spaces) that there would be no need to exceed the maximum – indeed this point is made in paragraph 26 of the

applicants latest Parking Justification Note. **The LHA cannot accept the proposals in this regard as they exceed the number of parking spaces as derived from the Council's Maximum Parking Standards, which could undermine the need to encourage the right balance of vehicle based and sustainable trip making (particularly given concerns raised earlier in this response on the acceptability of Active Travel Provision).**

Cycle Parking – Cycle parking should be provided in accordance with the Council's LPGN 16 Parking Standards. For B2 use this equates to one space per 500sqm (or one per 1000sqm for B8). Cycle parking proposals have not been specified, either in the masterplan or the Parking Justification Note, but for the larger units the required level of cycle parking does not appear to be proposed given the limited cycle stands shown. Cycle parking (in this case secure lockers / cages) should be provided in safe and convenient locations and meet the requirements set out in the Welsh Government's Active Travel Act Guidance (ATAG) section 14.8. **The LHA cannot therefore support the proposals given the uncertainty that sufficient and suitable cycle parking in accordance with the Council's LPGN16 and ATAG appears not to have been proposed.**

Swept-Path Drawings

Various swept-path drawings have been submitted for the internal site area:

Unit 3 B2 Layout – No swept-paths have been provided for the HGV parking bays, or at least the most onerously positioned bays.

The swept-path envelope for the loading bay movement is very close to a number of parking spaces which indicates this will be an onerous manoeuvre. As noted in other aspects of the application, the LHA would expect to see clearance beyond the envelope to allow for a margin of error – for instance the driver not being ideally positioned or not manoeuvring exactly as required. There appears to be a separation of less than 20cm between swept-path envelope and the edge of the nearest parking space. If the movement is this tight, the risk is drivers will not attempt it and instead reverse in from the highway, which is not acceptable.

If the dark circles/dots indicate a loading bay, there appears to be a second loading bay for which no swept-path has been provided. Given this apparent second loading bay is very close to the double parking area, it is unclear if this would be possible without conflict.

The egressing left turn swept-path is tight against the kerb and encroaches into the oncoming lane. Encroachment into oncoming lanes is acceptable in certain scenarios – for instance refuse collection vehicles, as these are infrequent movements. Given the type of land use, this situation would not be infrequent and therefore a HGV encroaching into the oncoming traffic lane is not acceptable. This is a new layout, free of constraint and the should be designed to accommodate movements safely and efficiently.

Unit 4 and 5 B2 Layout – These two units share an access and manoeuvring space. The LHA have concerns over shared manoeuvring space unless there is a control mechanism to ensure this space is safeguarded and maintained for this purpose alone.

The egressing swept-path over-runs the kerb of the splitter island suggesting the remaining movement will need to be re-assessed.

Unit 6 B2 Layout – as noted above, the most onerously positioned HGV bays have not been assessed.

Unit 14 and 15 B2 Layout - These two units share an access and manoeuvring space. The LHA have concerns over shared manoeuvring space unless there is a control mechanism to ensure this space is safeguarded and maintained for this purpose alone. The swept-paths should assume a HGV parked at the loading bay of the adjacent unit to demonstrate the movements are still practical if a HGV is loading in this adjacent bay.

Unit 16 B2 Layout – The left turn out movement encroaches into the oncoming lane, and as shown on this plan conflicts with an oncoming HGV. Similarly, the left turn is shown as conflicting with the right turn out. Within the site the reversing movement into the HGV bay appears to have a separation of less than 25cm between the swept-path envelope and the edge of a parking space.

In several instances, the swept-path assessment does not cover both left *and* right turns into / out of units, where such movements in/from either direction might reasonably be expected to take place.

It appears that the on-site highway configuration has changed from that presented in previous iterations of the scheme proposals. No swept-path assessments have been provided for the internal spine road or key adjacent roads, nor of the side junctions. The LHA therefore cannot be sure that the internal highway is suitable to accommodate coincidental HGVs especially on the bends in the spine road.

The above missing assessments are needed to demonstrate HGVs can enter and egress each site in a forward gear, to avoid the potential of HGVs reversing from, or into the highway and safely negotiate the wider site. **The LHA cannot accept the proposals as presented given these missing elements mean the safe and efficient operation of the highway has not been demonstrated.**

On-Site Highway Layout

Requests have previously been made for confirmation of the proposed highway adaptation strategy, given the spine road and other key roads are within the detailed application element. The latest information states that client wishes to retain flexibility in this regard and proposes to design the internal highway to adoptable standards. Given the gaps in information provision highlighted above the LHA cannot be sure that the proposals will be workable.

Active Travel

The applicant's Highways Technical Note states that the updated masterplan meets the LHA's requirements with regards to Active Travel provision – this is not correct. The latest masterplan shows 3m shared footway / cycleway. Whilst this represents an improvement over the previous proposals, this 'shared' provision does not meet the standards or expectations of the LHA or the Council's. As set out in the ATAG, Shared footway/cycle surfaces are not generally recommended and are usually only acceptable where there are significant constraints. As this is a new site, no such constraints exist and there is no justification for this lesser level of provision. Both the LHA and the Council's Active Travel officer consider that for such a size, scale and type of development, a segregated footway and cycle-track, separated from traffic should be provided – as has been communicated previously.

Previous iterations of the masterplan have shown highway cross sections with sufficient width to accommodate the necessary segregated cycle and pedestrian provision, so this should not impact on the developable area. It is therefore unclear why despite previous discussions on this, this higher level of provision is not shown.

The existing shared provision across much of the Industrial Estate pre-dates current standards and is no longer suitable for new development. WCBC have plans to upgrade walking and cycling provision across the industrial estate to meet ATAG standards and therefore ATAG compliant and aspirational provision will be the requirement, not a provision that is usually only accepted because of clear constraints. As stated elsewhere, this is a blank canvas site and should be designed to the highest standards.

Active Travel Crossings – The latest masterplan now shows crossings over unit access points which is a welcomed improvement. Crossings of side road junctions are also shown, but these are set back from the likely desire line and should be positioned closer to the junction.

Based on this latest information, the LHA and the WCBC Active Travel Officer cannot support the proposals as they are unlikely to deliver the potential to encourage modal shift or provide a safe environment for pedestrian and / or cyclists.

Substations

Despite previous requests, swept-paths and visibility splays have not been provided for the substation on Ridley Wood Road. Such information is required where any new permanent access onto the highway is proposed. Swept-paths are needed to demonstrate suitable vehicles can enter and egress the sub-station area in a forward gear and will not need to reverse into or from the carriageway.

Off-Site Junction Mitigation (Borras Hall Lane Roundabout)

Having reviewed the LinSig model of the proposed partially-signalised junction proposal, the LHA has identified a number of concerns over the layout and modelling of this mitigation proposal:

- Traffic Minimum greens are set to 5s rather than the required 7s. This is important as the minor entry arms are shown as only running to minimum greens in some scenarios.
- As the junction will still contain two un-signalised entries, it is important that the modelling of these is accurate – especially as LinSig is not primarily intended to model priority controlled elements within roundabouts. For the Sandy Lane and Borras Hall Lane entries all give-way coefficients are set to 1.09. This is the standard value for an opposed right turn at a signalised junction (where a vehicle has to give-way to oncoming traffic to turn right) and is generally not appropriate for roundabout entry give-way behaviour. We note the LinSig user guidance in this regard states that roundabout entry behaviour is not exactly the same as a simple priority junction, and using any default coefficient is only the starting point rather than the final calibrated value. The final calibrated value should be based on ARCADY assessments. It appears that the incorrect default value has been used and that there is no certainty that the junction would operate as shown.
- The layout in Appendix A shows a number of the proposed stoplines positioned in front of, adjacent to or very close to the existing uncontrolled pedestrian crossing points. There should be a minimum 2m set back from edge of crossing to the stop-line. Correcting this may affect the assumed lane widths and the subsequent stopline saturation flow values which also therefore raises uncertainty over the accuracy of the modelling and predicted operation.
- On the Wrexham Road entry, it is unclear if there is sufficient space on the pedestrian refuge / splitter island to accommodate the signal equipment (signal pole, head etc) and still maintain the pedestrian crossing width, particularly given the comment above about stopline setback position.
- As noted on previous LHA responses, the results show problematic internal queuing on two of the circulatory stoplines that would be significant enough to impede the upstream operation of the junction (Links 12/1 and 15/2). As noted in previous responses this is a fundamental challenge with signalising roundabouts, where there is often insufficient space to practically manage internal queuing.

Notwithstanding this and as noted in previous responses, whilst the Degree of Saturation (DoS) and queuing values referenced in the Technical Note (TN) appear reasonable, these do not reflect the full operational picture, or the operational and potential safety issues that will result from the internal queuing.

On the basis of these issues, the LHA does not have confidence that the proposed layout would be safe or efficient. Nor does the LHA have confidence that the predicted level of operation would be realistic, given the changes that would need to be made are likely to significantly affect the timings of the junction. On this basis the LHA cannot accept the proposals nor the unmitigated impact on this junction.

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 lacked the technical accuracy required and this has contributed to a drawn-out review period and multiple-iterations of reviews and re-reviews that has been significantly beyond that which would normally or reasonably 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.

*RWE*Edwards

Contracts & Engineering Manager

On behalf of the Chief Officer, Environment & Technical