

Land North of Bryn Lane, Wrexham Industrial Estate

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WCBC Highways Consultation Response

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Client: Net World Sports

Date: 13 August 2026

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Job No 329525

Approved by: ME

1. Introduction

- 1.1.1 This note (TN02) has been prepared by Mode Transport Planning ('Mode') on behalf of Net World Sports (the 'Applicant') to review comments raised by Wrexham County Borough Council (WCBC) Highways, as the Local Highway Authority (LHA), in relation to a planning application (ref P/2023/0497) for a proposed employment development at Land North of Bryn Lane, Wrexham (known as Utopia City).
- 1.1.2 Additional information was submitted by the Applicant to WCBC on 18th June 2026. A consultation response dated 30th June 2026 was received from the LHA with a recommendation for refusal. WCBC's full consultation response is attached in [Appendix A](#).
- 1.1.3 The purpose of this note is to respond to the matters raised within LHA's consultation response, with consideration to adopted policy and guidance. The response is structured to cover the following matters:
- Active travel route provision;
 - Proposed car and cycle parking provision;
 - Swept path analysis; and
 - Proposed substation access and swept path analysis.
- 1.1.4 It should be noted that the LHA's response also includes comments in relation to the proposed off-site mitigation at the Borrass Hall Lane / Sandy Lane / Wrexham Road / Industrial Estate Road Roundabout. It is proposed to address these through submission of updated design, supported by a new traffic impact assessment prepared by Mode. This will be presented in a separate note issued to the LHA (TN03).

2. Active Travel Route Provision

2.1 Active Travel Crossings

2.1.1 The LHA's comments regarding crossing locations are noted. The revised masterplan demonstrates that the provision of appropriate active travel crossings can be achieved, with the final positioning and alignment to be refined at the detailed design stage. This will ensure crossings are located as close as practicable to pedestrian desire lines, while taking account of highway safety and accessibility requirements.

2.2 WCBC Cycle Route Position

2.2.1 The LHA has requested that the proposed 3m wide shared pedestrian and cycle route be redesigned as a fully segregated facility, stating that shared footway/cycle surfaces are "*not generally recommended*" and are usually only acceptable where significant constraints exist. The consultation response concludes that, because the development represents a new site with no physical constraints, segregated pedestrian and cycle facilities should be provided throughout.

2.2.2 The provision of a 3m wide shared use path was proposed based on the Welsh Government Active Travel Act Guidance (2021) (ATAG). On further review of ATAG, the LHA's interpretation does not reflect either the wording or the design methodology set out within the guidance, as detailed in the following sub-sections.

2.3 Policy Context

2.3.1 ATAG identifies two approaches for accommodating pedestrians and cyclists along a route:

- provision of separate pedestrian and cycle space; or
- provision of a shared use facility.

2.3.2 ATAG therefore identifies both segregated and shared use facilities as appropriate design solutions. Paragraphs 7.6.5 to 7.6.6 require "appropriate facilities" to be provided, with the design informed by the Transport Assessment and "*forecast all-user travel demand*."

2.3.3 The guidance therefore does not establish segregation as a mandatory requirement for all new developments. Instead, the appropriate solution should be determined having regard to the anticipated demand and characteristics of the proposed route.

2.3.4 The LHA state that "shared routes are not generally recommended"; however, the relevant section in Chapter 11 principally relates to the conversion of existing footways to shared use. The current proposal is for a new shared use path within a new development, which ATAG recognises as an accepted design solution and provides specific design guidance in relation to this form of provision.

2.4 Forecast Pedestrian and Cycle Demand

- 2.4.1 Based on 7.6.5 to 7.6.6 of ATAG, it is important to establish expected levels of demand along the proposed route. For the proposed development, the number of non-car trips has been forecast using 2011 census Method of Travel to Work data for the site's mid layer super output (MSOA) area 'Wrexham 020' as a workplace destination.
- 2.4.2 Whilst it is acknowledged that 2011 Census data is now 15 years old, due to the global pandemic, it is still the most relevant data available for use in calculating journeys to work.
- 2.4.3 The modal share derived from the Census data is presented in [Table 2.1](#).

Table 2.1 : 2011 Census Modal Share Data – 'Wrexham 020'

Method of travel to work	Trips	Modal Share %
Driving a car or van	11,105	79%
Passenger in a car or van	1,421	10%
Bus, minibus or coach	479	3%
On foot	415	3%
Bicycle	307	2%
Motorcycle, scooter or moped	143	1%
Taxi	61	0%
Train	54	0%
Total	13,985	100%

- 2.4.4 The latest information submitted to WCBC for the site access ARCADY assessment indicated that the combined Phase 1 and Phase 2 development traffic generation would result in 928 two-way PCU movements during the AM peak and 1067 two-way PCU movements during the PM peak. It should be noted that not all of these trips are new trips. These include pass-by and diverted trips associated with the Phase 2 land uses, as set out by previous work undertaken by Cora IHT.
- 2.4.5 Based on the percentages for driving a car or van presented in [Table 2.1](#), the multi-modal trips were calculated and the two-way totals for each mode during the AM and PM peak hours are presented in [Table 2.2](#).

Table 2.2 : Forecast Multi-Modal Trips – Proposed Development

Method of travel to work	AM	PM
Driving a car or van	928	1067
Passenger in a car or van	189	217
Bus, minibus or coach	64	73
On foot	55	63
Bicycle	41	47
Motorcycle, scooter or moped	19	22
Taxi	8	9
Train	7	8
Total	1310	1506

2.4.6 It is anticipated that the proposed development would generate 55no. two-way pedestrian movements and 41no. two-way cycle movements during the AM Peak. During the PM, the proposed development is expected to generate 63no. two-way pedestrian movements and 47no. two-way cycle movements.

2.4.7 It should also be noted that the proposed development would generate 64no. and 73no. two-way bus trips during the AM and PM peak respectively. As the nearest bus stop is off-site, these totals have been added to the pedestrian movements within the respective peak hours. The total forecast number of pedestrian and cycle trips are presented in [Table 2.3](#).

Table 2.3 : Pedestrian and Cycle Trips

Method of travel to work	AM Movements	PM Movements
Walking and Bus / Walk	119	136
Cycle	41	47
Combined Total	160	187

2.4.8 Based on the forecast number of trips presented in [Table 2.3](#), the highest combined total in a single hour is 187no. two-way pedestrian / cycle trips.

2.4.9 ATAG provides guidance for shared use routes and recommends a minimum width of 3m for routes accommodating up to 300 pedestrians per hour and 300 cyclists per hour (ATAG Table 11.5). The forecast demand associated with the development is therefore substantially below this threshold. Furthermore, as the roads would serve the new units directly, it is unlikely that background levels of pedestrians and cyclist would result in total numbers close to these thresholds.

2.4.10 Even if the proposed development achieved a modal shift reduction of 10% from car drivers to public transport, walking and cycling, the combined total would remain below 300 users per hour.

2.4.11 It is therefore considered that the proposed 3m wide shared use path would provide capacity in excess of the forecast peak demand and is “appropriate” for the anticipated level of use and potential future growth, , in accordance with ATAG (paragraph 7.6.5 and 7.6.6).

2.5 Consideration of Segregation

2.5.1 Paragraph 11.14.4 in ATAG identifies a range of factors that should be considered when determining whether pedestrians and cyclists should be separated, including:

- forecast user volumes (addressed above);
- conflicting directions of movement;
- presence of vulnerable users; and
- cycle journey purpose

2.5.2 Paragraph 11.16.4 recognises that shared use facilities may be appropriate where this reflects the route environment and expected user interactions. These considerations are relevant in the context of the development proposals.

2.5.3 The proposal comprises B2/B8 employment uses within an established industrial estate served by existing shared use paths. The resulting movement characteristics are expected to comprise:

- relatively low pedestrian and cyclist flows concentrated around shift changes;
- predominantly commuter trips with direct origin-to-destination movements;
- no schools or other significant generators of vulnerable users; and
- short final approach movements between the site access roundabout and individual employment units;

2.5.4 These characteristics do not indicate levels of pedestrian-cyclist interaction that would necessitate segregation on operational or safety grounds.

2.6 Response to LHA Position

2.6.1 It is acknowledged that ATAG expresses a preference for segregated pedestrian and cycle facilities where this is justified by the route context and anticipated levels of demand. However, the guidance also recognises that shared use facilities remain an appropriate design solution where suited to the characteristics of the route and expected user demand.

- 2.6.2 Within their response, the LHA expressed a preference for segregated provision, citing the opportunity presented by a new development and the absence of significant physical constraints. Whilst this aspiration is recognised, it is considered that the suitability of the proposed facility should be assessed having regard to the anticipated pedestrian and cyclist demand, the surrounding environment and the relevant design recommendations contained within ATAG.
- 2.6.3 As presented in this note, peak hour forecasts of pedestrian and cycle movements associated with the proposed development fall within the threshold for which ATAG considers a 3m shared use facility to be appropriate. The route will primarily serve commuter movements within an established employment area and is not intended to function as a strategic active travel corridor.
- 2.6.4 The applicant also acknowledges WCBC's wider aspirations to enhance the active travel network over time. However, the proposed route will connect to an existing network that is predominantly shared use in nature, and no committed or adopted scheme has been identified that would necessitate segregated provision at this location. Consequently, it is considered appropriate that the proposal is assessed against the current requirements of ATAG and the forecast level of demand generated by the development, rather than against longer-term aspirations for future network enhancements.
- 2.6.5 Based on the anticipated user demand, the surrounding context and the guidance contained within ATAG, it is considered that the proposed 3m shared use paths represent an appropriate, safe and proportionate design solution for the development to support active travel.

3. Parking Provision

3.1 WCBC Parking Standards

- 3.1.1 WCBC's parking standards for B2 / B8 land uses are set out in Local Planning Guidance Note (LPGN) 16. These are summarised in [Table 3.1](#).

Table 3.1 : WCBC Adopted Parking Standards (source : WCBC)

Land Use	Maximum Car Parking	Minimum Accessible Parking	Minimum Cycle Parking
B2 General Industry	1 car space per 50 sqm gross floor space	10% of spaces	1 cycle space per 500 sqm gross floor space
B8 Storage and Distribution	1 car space per 100 sqm gross floor space	10% of spaces	1 cycle space per 1,000 sqm gross floor space

Car Parking Provision

3.1.2 In the LHA's latest response, it was noted that several units for both the B2 and B8 masterplans exceed the maximum car parking standards specified within [Table 3.1](#). The proposed masterplans for the respective land uses with revised car parking provision are attached in [Appendix B](#).

3.1.3 The updated level of car parking provision at each unit is summarised in [Table 3.2](#) and [Table 3.3](#) against the maximum standard.

Table 3.2 : Proposed Car Parking Provision B2 Masterplan

Unit	GFA	Standard Spaces	Accessible Spaces	Total	WCBC Standard	Percentage
3	2,063	37	4	41	41	100%
4	2,063	37	4	41	41	100%
5	2,063	37	4	41	41	100%
6	5,712	91	10	101	114	89%
7	10,293	176	19	195	206	95%
14	854	15	2	17	17	100%
15	1319	23	3	26	26	100%
16	3879	64	7	71	78	100%

Table 3.3 : Proposed Car Parking Provision B8 Masterplan

Unit	GFA	Standard Spaces	Accessible Spaces	Total	WCBC Standard	Percentage
2	33,177	299	33	332	332	100%
3	2,063	19	2	21	21	100%
4	2,063	19	2	21	21	100%
5	2,063	19	2	21	21	100%
6	5,712	47	5	52	57	91%
7	10,293	89	10	99	103	96%
14	854	8	1	9	9	100%
15	1319	12	1	13	13	100%
16	3879	35	4	39	39	100%

3.1.4 The proposed level of car parking provision within the updated B2 and B8 masterplan layouts demonstrate that no units will exceed the maximum car parking standard. All units, with the exception of Unit 6 (89% B2 and 91% B8) and Unit 7 (95% B2 and 96% B8), would provide parking at the maximum standard.

Cycle Parking Provision

3.1.5 The updated level of cycle parking provision at each unit is summarised in [Table 3.4](#) and [Table 3.5](#) against the minimum standard.

Table 3.4 : Proposed Cycle Parking Provision B2 Masterplan

Unit	GFA	Cycle Spaces	WCBC Standard	Percentage
3	2,063	4	4	100%
4	2,063	4	4	100%
5	2,063	4	4	100%
6	5,712	11	11	100%
7	10,293	21	21	100%
14	854	2	2	100%
15	1319	3	3	100%
16	3879	8	8	100%

Table 3.5 : Proposed Cycle Parking Provision B8 Masterplan

Unit	GFA	Cycle Spaces	WCBC Standard	Percentage
2	33,177	33	33	100%
3	2,063	2	2	100%
4	2,063	2	2	100%
5	2,063	2	2	100%
6	5,712	6	6	100%
7	10,293	10	10	100%
14	854	1	1	100%
15	1319	1	1	100%
16	3879	4	4	100%

3.1.6 Cycle parking provision on the site can be secured via an appropriate planning condition.

4. Swept Path Analysis

4.1 Updated Drawings

4.1.1 The LHA's consultation response raised some concerns regarding the submitted swept path analysis drawings. These comments related to the proposed B2 layouts, where movements by articulated HGVs are expected to be less than for a B8 land use. The comments have been reviewed and some minor amendments made to the proposed layout. Revised drawings for the updated B2 masterplan are attached in [Appendix C](#).

4.1.2 The updated drawing references and how they relate to each unit are set out in [Table 3.1](#).

Table 4.1 : Swept Path Analysis Drawing References

Unit	B2 Drawing Reference
3	J32-9525-PS-010
4/5	J32-9525-PS-011
6	J32-9525-PS-013
14/15	J32-9525-PS-014 J32-9525-PS-023
16	J32-9525-PS-015
Internal Access Roads and Junctions	J32-9525-PS-017 J32-9525-PS-018 J32-9525-PS-019

4.1.3 At the request of the LHA, swept path analysis has been undertaken for all internal roads and junctions for a 16.5m articulated HGV. It should also be noted that this internal road has been designed to an adoptable standard with an 8.3m carriageway width. All updated swept path analysis has been included on the B2 layout. However, the internal road layout remains the same for the B8 layout. The changes relate to parking requirements and service yards. Therefore, providing swept path analysis for the B2 masterplan presents the worst case in terms of service yard space for manoeuvring HGVs.

4.2 Units 14/15 – B2 Layout

4.2.1 As demonstrated by the swept path analysis attached in [Appendix C](#), the shared service yard serving Units 14 and 15 can accommodate simultaneous servicing movements by 10m rigid HGVs and a 10m rigid with a 16.5m articulated HGV, with vehicles able to access and egress both units independently.

- 4.2.2 For larger vehicles, the swept path analysis demonstrates that a 16.5m articulated HGV can access and egress the LAD serving either Unit 14 or Unit 15 in a forward gear when the LAD serving the adjacent unit is occupied by a 10m rigid HGV. However, due to the parking requirements for the B2 use reducing the available space within the service yard, manoeuvring by a 16.5m articulated HGV would be constrained where a 16.5m articulated HGV is already parked at the adjacent LAD.
- 4.2.3 It is therefore relevant to consider the likely frequency of HGV servicing activity at Units 14 and 15 and, in particular, the likelihood of an HGV arriving at one unit while the adjacent LAD is already occupied by a 16.5m HGV. To assess this, HGV trip generation has been calculated using the TRICS trip rates previously accepted by WCBC as part of work undertaken by Cora IHT for an 'Employment – Industrial Unit' land use. The resulting HGV trip generation is presented in [Table 4.2](#).

Table 4.2 : Previously Agreed HGV Trip Rates – Employment Industrial Unit

Time	Trip Rate			Unit 14 (854sqm) Trip Generation			Unit 15 (1,319) Trip Generation		
	Arr	Dep	Total	Arr	Dep	Total	Arr	Dep	Total
AM	0.012	0.012	0.024	0	0	0	0	0	0
PM	0.009	0.011	0.020	0	0	0	0	0	0
Daily	0.184	0.172	0.356	2	1	3	2	2	4

- 4.2.4 The TRICS assessment demonstrates that Units 14 and 15 would generate very low levels of HGV activity. Across the two units combined, a total of only four HGV arrivals are forecast over the TRICS daily assessment period of 05:00 to 22:00, comprising two arrivals at Unit 14 and two arrivals at Unit 15.
- 4.2.5 Spread across this 17-hour period, the combined level of activity is equivalent to approximately one HGV arrival every 4 hours. At an individual unit level, two HGV arrivals over the same period equate to an average of only one arrival every 8 hours. Furthermore, no HGV arrivals are forecast during either the AM or PM peak hours.
- 4.2.6 Given the very low frequency of HGV arrivals, the likelihood of a 16.5m articulated HGV arriving at one unit while a 16.5m articulated HGV is already occupying the LAD at the adjacent unit is considered to be low. Simultaneous servicing of the two units by a 16.5m HGV would therefore represent an infrequent occurrence.

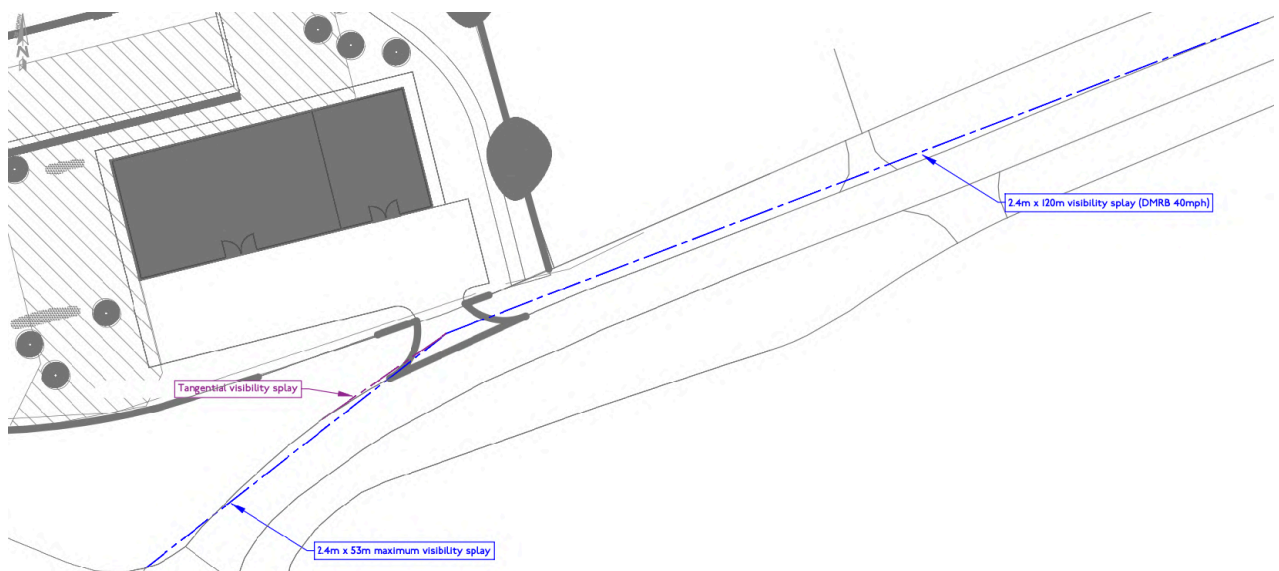
- 4.2.7 While the swept path analysis identifies a constraint where a 16.5m articulated HGV seeks to manoeuvre while the adjacent LAD is occupied by a 16.5m HGV, the swept path analysis demonstrates that if the adjacent unit is occupied by a 10m rigid HGV, then independent access is achievable. In addition, the forecast HGV demand indicates that this event would be unlikely to occur on a typical day. The proposed arrangement is therefore considered appropriate to accommodate the anticipated servicing requirements of Units 14 and 15 for a B2 land use.

5. Substation Access

5.1 Proposed Access

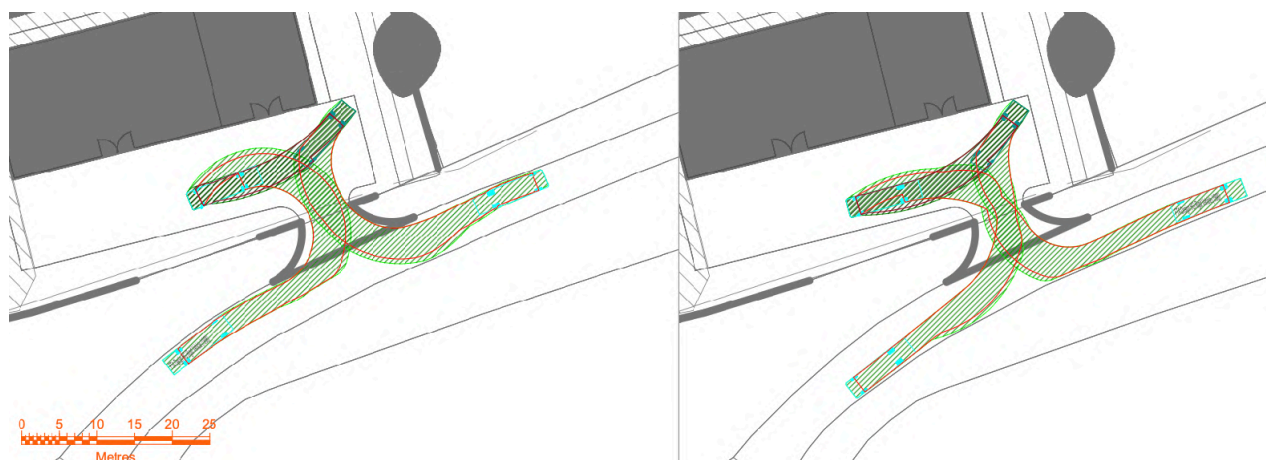
- 5.1.1 The proposed substation access, with achievable visibility splays along Ridley Wood Road, is shown in [Figure 5.1](#), and in **Drawing No. J32-9525-PS-020** attached in [Appendix D](#).

Figure 5.1 : Proposed Substation Access



- 5.1.2 In accordance with the signed speed limit of 40mph, a 2.4m x 120m visibility splay is achievable to the east. The maximum visibility splay of 2.4m x 53m to the west is shown to the junction with Bryn Lane.
- 5.1.3 Swept path analysis has been undertaken for a 10m Rigid vehicle, which demonstrates the vehicle can enter and exit the site in a forward gear. This is shown in [Figure 5.2](#), and in **Drawing No. J32-9525-PS-020** attached in [Appendix D](#).

Figure 5.2 : Proposed Substation Swept Path Analysis



5.1.4 It should be noted that whilst a 10m Rigid vehicle can enter and exit the site, regular maintenance visits to the substation are typically undertaken using smaller vans or pickup truck. Once the substation units are installed, the utility operators do not require larger vehicles to visit the substations.

6. Summary

6.1.1 This note responds to the LHAs latest consultation comments by demonstrating that the proposed active travel, parking, internal road layout and substation access arrangements are compliant with relevant policy and guidance.

6.1.2 On the matters addressed in this note, it is respectfully requested that they should not form part of a recommendation for refusal on highways grounds.

APPENDIX A WCBC Highways Response

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

APPENDIX B

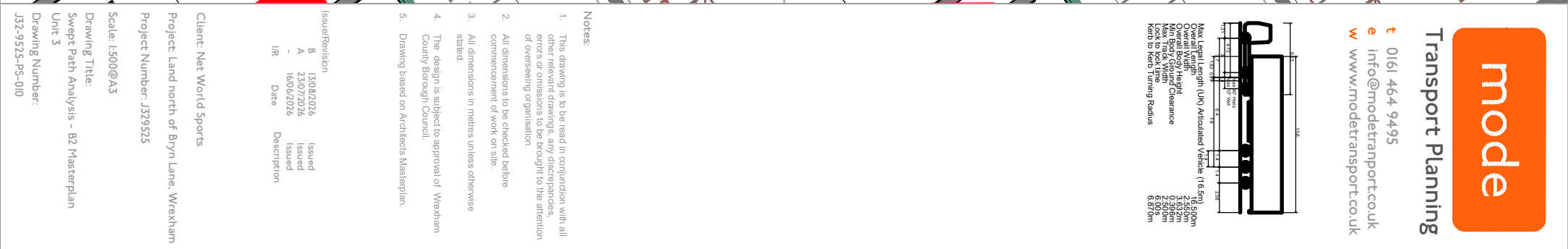
Proposed Site Layouts

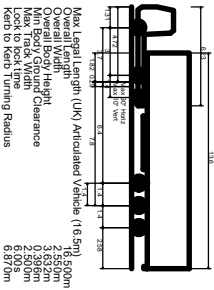
Ref	Date	Px	Description
A	26/02/2008	JMS	Rebuilt and sealed
B	26/02/2008	JMS	Rebuilt and sealed
C	26/02/2008	JMS	Rebuilt and sealed
D	26/02/2008	JMS	Rebuilt and sealed
E	26/02/2008	JMS	Rebuilt and sealed
F	26/02/2008	JMS	Rebuilt and sealed
G	26/02/2008	JMS	Rebuilt and sealed
H	26/02/2008	JMS	Rebuilt and sealed
I	26/02/2008	JMS	Rebuilt and sealed
J	26/02/2008	JMS	Rebuilt and sealed
K	26/02/2008	JMS	Rebuilt and sealed
L	26/02/2008	JMS	Rebuilt and sealed
M	26/02/2008	JMS	Rebuilt and sealed
N	26/02/2008	JMS	Rebuilt and sealed
O	26/02/2008	JMS	Rebuilt and sealed
P	26/02/2008	JMS	Rebuilt and sealed
Q	26/02/2008	JMS	Rebuilt and sealed
R	26/02/2008	JMS	Rebuilt and sealed
S	26/02/2008	JMS	Rebuilt and sealed
T	26/02/2008	JMS	Rebuilt and sealed
U	26/02/2008	JMS	Rebuilt and sealed
V	26/02/2008	JMS	Rebuilt and sealed
W	26/02/2008	JMS	Rebuilt and sealed
X	26/02/2008	JMS	Rebuilt and sealed
Y	26/02/2008	JMS	Rebuilt and sealed
Z	26/02/2008	JMS	Rebuilt and sealed

Proposed Illustrative Site Masterplan

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APPENDIX C Swept Path Analysis

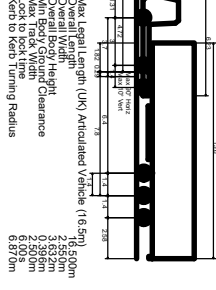




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code

1. This drawing is to be read in conjunction with all other relevant drawings; any discrepancies, errors or omissions to be brought to the attention of overseeing organisation.
2. All dimensions to be checked before commencement of work on site.
3. All dimensions in metres unless otherwise stated.
4. The design is subject to approval of Wrexham County Borough Council.
5. Drawing based on Architects Masterplan.



Notes:

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Issue/Revision			
B	13/08/2026	Issued	
A	08/07/2026	Issued	
-	16/06/2026	Issued	
1/R	Date	Description	

Client: Net World Sports

Project Land north of Bryn Lane, Wrexham

Project Number: J329525

Scale: 1:500@A3

Drawing Title:

Sweep Path Analysis - B2 Masterplan

Unit 16

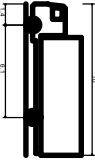
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J32-9525-PS-015

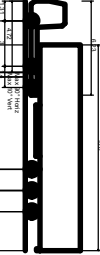


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FTA Design HD Right Vehicle (1989)
Overall Length 10,000mm
Overall Body Height 3,540mm
Min Body Ground Clearance 2,440mm
Max Body Height 2,440mm
Wheel to hook time 3,000mm
Lead to kerb turning Radius 11,000mm



Max Legal Length (UK) Articulated Vehicle (16.5m)
Overall Length 16,500mm
Overall Body Height 3,520mm
Max Body Height 3,520mm
Max Track Width 2,500mm
Kerb to kerb turning Radius 8,000mm

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Issue/Revision		
-	13/08/2026	Issued
1/R	Date	Description

Client: Net World Sports

Project Land north of Bryn Lane, Wrexham

Project Number: J329525

Scale: 1:500@A3

Drawing Title:

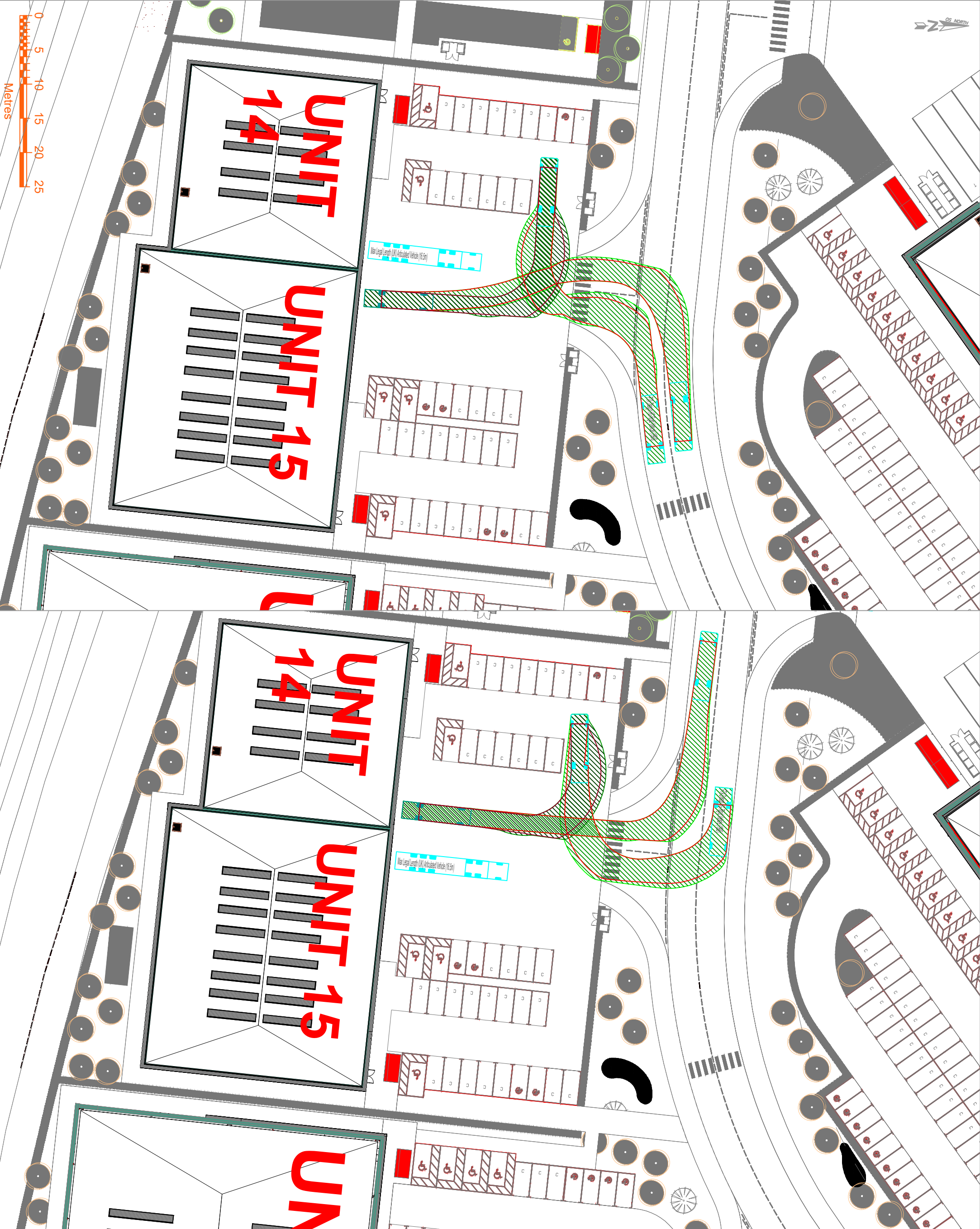
Swept Patch Analysis - B2 Masterplan
Units 14 & 15

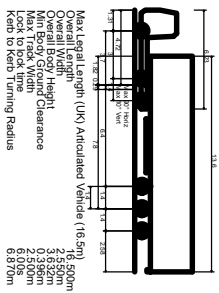
Drawing Number:
J32-9525-PS-023



Project Management Initials: Designer: ME Checked: LJ Approved: LCW ISO A3 297mm x 420mm

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Last saved by: WINDOWS Last Plotted: 2026-08-13





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	Issued	Description
-	11/08/2026	
I/R	Date	

Issue/Revision

Client: Net World Sports

Project Land north of Bryn Lane, Wrexham

Project Number: J329525

Scale: 1:500@A3

Drawing Title:

Swept Path Analysis - Spine Road

Internal Junction

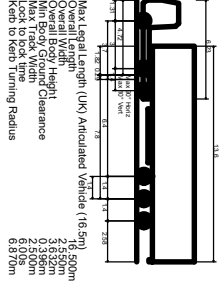
Drawing Number:

J32-9525-PS-017



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3. All dimensions in metres unless otherwise stated.
4. The design is subject to approval of Wrexham County Borough Council.
5. Drawing based on Architects Masterplan.

Issue/Revision	
-	11/08/2026 Issued
I/R	Date Description

Client: Net World Sports

Project Land north of Bryn Lane, Wrexham

Project Number: J329525

Scale: 1:500@A3

Drawing Title:

Swept Path Analysis - Spine Road

Internal Junction

Drawing Number:

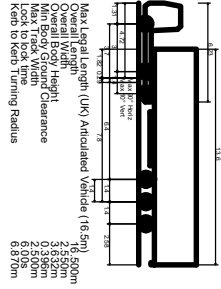
J32-9525-PS-018





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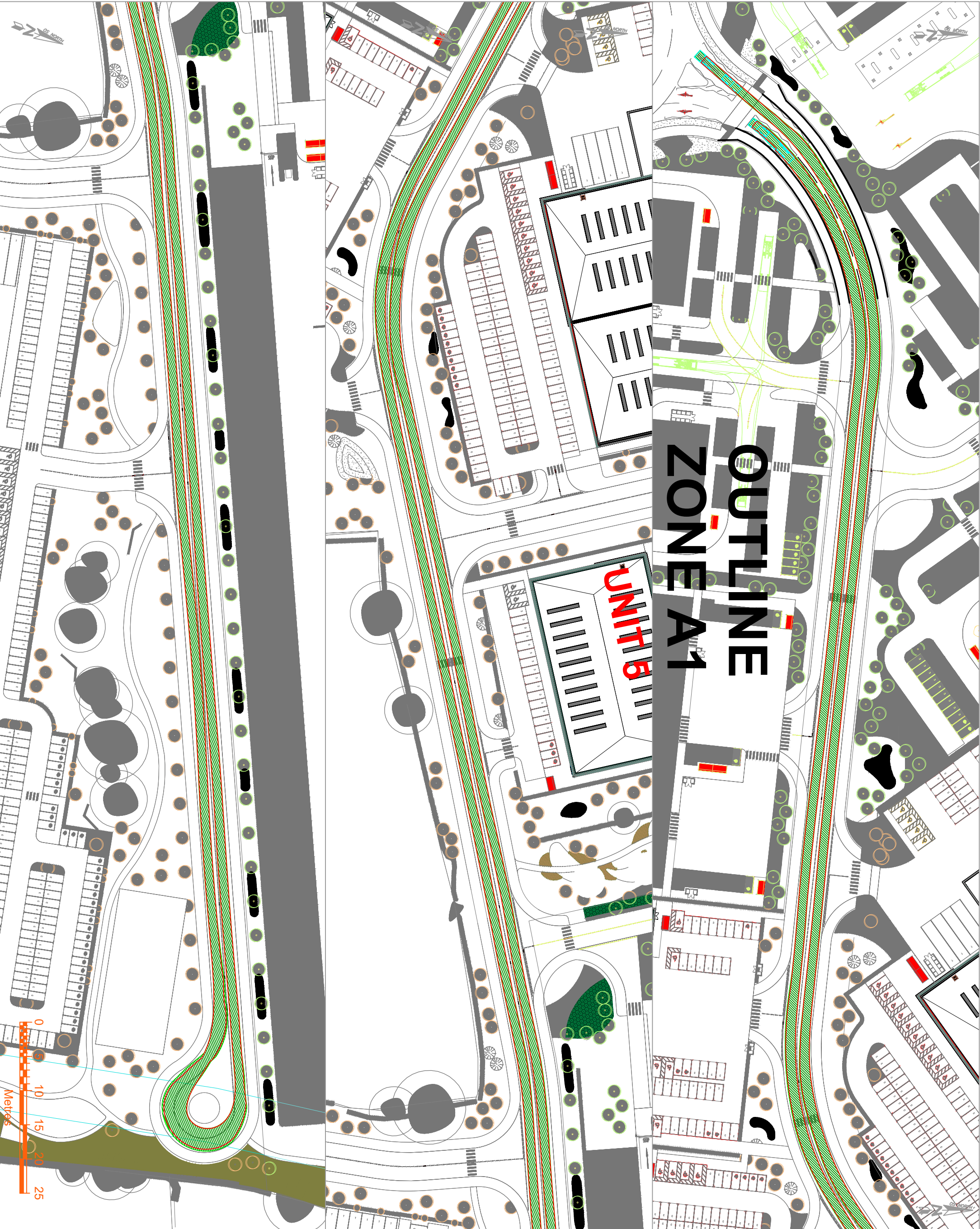


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4. The design is subject to approval of Wrexham County Borough Council.
5. Drawing based on Architects Masterplan.

Issue/Revision	
-	11/08/2026 Issued
IR	Date Description
Client: Net World Sports	
Project Land north of Bryn Lane, Wrexham	
Project Number: J329525	
Scale: 1:1000@A3	
Drawing Title:	
Swept Path Analysis - Spine Road	
Drawing Number:	
J32-9525-PS-019	

OUTLINE ZONE A1

UNIT 6

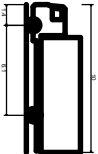


APPENDIX D Substation Access and Swept Path Analysis



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FT19 Designing Road Vehicle (1986)
Overall Width 2.4m
Overall Height 3.5m
Min Body Ground Clearance 0.44m
Min Body Ground Clearance to foot time 1.05m
Kerb to Kerb turning Radius 11.000m

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 2. All dimensions to be checked before commencement of work on site.
 3. All dimensions in metres unless otherwise stated.
 4. The design is subject to approval of Wrexham County Borough Council.
 5. Drawing based on Architects Masterplan.
- | Issue/Revision | Date | Description |
|----------------|------------|-------------|
| - | 08/07/2026 | Issued |

Client: Net World Sports

Project Land north of Bryn Lane, Wrexham

Project Number: J329525

Scale: 1:500@A3

Drawing Title:
Substation - Visibility Splay &
Swept Path Analysis
Drawing Number:
J32-9525-PS-020

