

MEMORANDUM

From:	Chief Officer, Environment & Technical	To:	Chief Officer Planning & Regulatory
Our Ref:	P/2020/0475	FAO:	Matthew Phillips
Date:	6 th November 2020	Your Ref:	

ONE STOREY AND TWO STOREY EXTENSIONS, REFURBISHMENT WORKS AND ASSOCIATED PARKING AREAS AND OUTDOOR RECREATION AND GAMES AREAS BORRAS PARK COMMUNITY PRIMARY SCHOOL BORRAS PARK ROAD WREXHAM

Further to your email / consultation dated 25/08/2020 and the updated drawings in November in respect of the above, I comment on the Transport Statement (TS), Car Park Management Plan (CPMP), Travel Plan (TP) and associated drawings as follows:-

Access

Pedestrian and Vehicular Access

The proposal retains the two existing vehicular access junctions onto Borrass Park Road, a 20mph single carriageway road, as well as three pedestrian accesses. There is also a pedestrian access linking the school to Lincoln Close. Proposals include an additional pedestrian access segregated from the vehicular access to the main parking area.

There are proposals to implement 'staggered pedestrian guardrail' along Borrass Park Road adjacent to the accesses. Further clarification should be provided as WCBC is concerned that guardrails restricts footway widths and therefore footway capacity. Therefore, this may have a negative impact on wheelchair and pushchair users.

The existing layby to the north of the proposed Child Care Unit (CCU) is included within the plan but with no indication of whether improvements or amendments will be made to this layby. It is assumed it will remain in its current form. The applicant / agent should confirm if any amendments are proposed.

Cycle Access

For cycle access it is stated that, *'Due to the density of pedestrians on the site at school drop-off and pick-up times, cycling would not be allowed on any of the internal footways to the site.'* Cyclists (likely to be children under the age of 11) will be expected to walk cycles along footways to access cycle parking areas or use vehicular accesses. WCBC strongly disagree with this and requests that the applicant review the internal footpaths/ways and if possible, provide wider footways/shared use paths on site to help accommodate child cyclists. Child cyclists should not be expected to use busy vehicular accesses. WCBC also recommend widening the existing access via Lincoln Close to accommodate cycles.

Public Transport Access

WCBC would expect further commentary regarding public transport (bus) access. Whilst it is acknowledged that there was no requirement stated by the Transport Section for any additional bus stops the existing services are infrequent and therefore it is likely to be difficult to encourage an increase in the sustainable modal share (as per targets in the TS and Travel Plan) if these remain unchanged.

Parking & Turning Provision

The existing site (school(s), surgery and community centre) have limited parking provision and are under pressure particularly during dropping off and picking up times. The previous parking assessment noted that there are 41 existing spaces at the upper site and 12 existing spaces at the lower site.

This section of Borrass Park Road is subject to double yellow lines on both sides of the road. There is a significant pre-existing on-street parking problem particularly at school dropping off / picking up times along the adjoining side streets and within the car park associated with the Borrass Shops.

The addition of a new Welsh Medium School will exacerbate the existing parking problems at the site, as the general school catchment area is larger than that for an English Medium School and there would be a high natural useage of motorised vehicles delivering pupils to the new school. From the information provided there does not appear to be a review of the existing parking problems at the site to suitably assess what level of increased parking provision will be required to be catered for at the existing and proposed schools, in particular the drop off/pick up demands. The TS and CPMP are based upon the WCBC parking standards and not the existing conditions. Further assessment is required on the existing conditions to fully identify existing parking behaviors, in particular the overspill demand to ensure these are addressed appropriately and sufficiently in the proposals.

The submitted layout plan includes the provision of 109 spaces within the curtilage of the site and a further 7 drop off spaces.

A Car Park Management Plan has been provided with the TS. A range of measures are suggested including walking buses and car sharing to help reduce the number of private cars associated with the proposed development. The CPMP discusses allocated spaces for a number of uses, however other than the 66 spaces in the main car park which would be managed by an automatic barrier there is little indication on how other spaces, eg car sharing/drop off would be managed other than that they'll be managed by 'staff'. Further information is required on how this will be achieved.

There is no clear indication on parking requirement and no review of the existing situation. It is unclear whether the 116 (total) parking spaces would be sufficient for the proposed development.

Whilst it is accepted that circumstances with Covid-19 and lockdowns meant that the applicant could not survey traffic movements or parking it is recommended that, when possible traffic and parking surveys are carried out. Liaison with the school will be necessary to determine when the school is operating 'as normal' as it is the existing parking issues that need to be assessed.

The applicant should provide evidence that the provision for the doctor's surgery has been agreed and will not result in overspill of parking into the school assigned spaces or on street.

There remains a concern about a potential scenario where drop off spaces are unavailable during drop off/pick up times due to the parking capacity being exceeded. Therefore, the applicant needs to provide information on how the drop off/pick up will operate and how it will be managed. It is expected that this will lead to an informal drop off situation with children moving between parked cars to access pick up vehicles whilst other vehicles move around them to access the turning area, presenting visibility and safety concerns.

Planning Policy Wales Edition 10 suggests a minimum of 10% of car parking spaces have charging points, although some of these may be 'passive' spaces that may be activated later as demand requires. The proposed provision of passive and active spaces is in line with this policy.

More detail should be provided as to how car sharing will be encouraged and managed.

WCBC's cycle parking standards must be followed.

Swept Path drawings are provided in Appendix A which show a refuse vehicle, a rigid bus and a coach accessing the Borrass Community Park Primary School building. The swept path drawing for a 15m coach shows that the vehicle is required to reverse over a pedestrian crossing to turn. The 11.25m refuse vehicle is shown to stop just short of the crossing when reversing. In addition, all three vehicles are shown to mount the kerb on turning and they are also using the roundabout to

complete reversing movements. The current design does not allow for large vehicles to turn safely and must be revised.

WCBC would like clarification regarding the proposed Borrás CP School Courtyard Playground which is adjacent to the servicing area. There are concerns that there could be conflict between a reversing vehicle and children if there are no barriers in place. The layout of the car park and staggered car parking spaces should allow for a coach to be able to safely manoeuvre within the car park.

The turning head to the rear of the Welsh Medium School appears to include a parking space. The applicant needs to demonstrate that a waste collection vehicle, servicing the bin store, would be able to turn within this area whilst a vehicle is parked within this space.

Traffic Generation

The TS assumes that there could be 28 additional staff cars (based on 28 additional staff) and 79 additional vehicles (based on existing car mode share). Borrás Park Road is particularly busy during school dropping off / picking up times and would not benefit from any significant increase in vehicle movements.

Of significant concern is the potential for up to 200 additional vehicles arriving at the school each morning and evening. The car parks and roads in the vicinity of the site are already under pressure.

A traffic assessment should be undertaken to establish the existing traffic flows and likely impact of additional traffic generated by the school extension.

It is also noted that the mode share for the existing Primary School has been used to forecast demand for the proposed Welsh Medium school. As Welsh medium schools typically have a wider catchment area than English medium schools, WCBC would anticipate a larger proportion of journeys to school made by car. The mode split used should be reviewed to ensure they are representative of a Welsh medium school.

Travel Plan

A Travel Plan has been provided which includes sustainable mode targets for the school including pupils and staff. These targets are quite ambitious.

It is noted that there is no review in the TS or TP of either of the school's catchment areas. This would be extremely useful for a Travel Plan, as it would provide a review of pupil's postcode areas, to ascertain how many live within an acceptable walking distance. It is accepted that the actual locations will vary year on year, but on average there is unlikely to be a significant change unless the catchment areas are revised.

'Park and Stride' could also be encouraged for the existing and proposed developments.

Pedestrian / Cycle Facilities

It is concerning that no improvements to or additional pedestrian/cycle facilities have been suggested especially with the pre-existing congestion and the on-street parking issues. With targets discussed in the Travel Plan WCBC would expect to find recommendations for improved infrastructure to encourage a shift to sustainable travel modes. Consideration should be made of whether there are any opportunities to improve active travel infrastructure in the vicinity of the school.

Road Safety

A review of accidents is included in section 8 of the TS. There are some instances eg 8.8.82 where 2 'school age' pedestrians have been involved in an accident and there is no further comment.

It is recommended that road safety observations are carried out on Borrás Park Road at drop off and pick up times to ascertain if there are any road safety issues. Due to the COVID19 restrictions

currently in place, a survey of the existing pupils and parents would provide a good insight into any safety concerns in the absence of a site visit.

Conclusion

There is a concern regarding the additional traffic movements and informal parking during peak drop off/pick up times on the Borrass Park Road and the local road network due to the proposed addition of the new Welsh Medium School. The applicant, to date, has not provided sufficient information to adequately assess the impact on the highway network. In addition, there are concerns that the proposed internal site layout does not allow for a large vehicle to turn safely.

WCBC Highways require the following:

- Further clarification on proposals to implement 'staggered pedestrian guardrail' along Borrass Park Road adjacent to the accesses.
- The applicant / agent should confirm if any amendments are proposed to the layby north of the proposed CCU.
- The applicant should review internal footpaths/footways and if possible, provide wider footways on site to help accommodate child cyclists. Child cyclists should not be expected to use busy vehicular accesses.
- The applicant should widen the existing access via Lincoln Close to accommodate child cyclists.
- Further commentary regarding public transport (bus) access, including consideration of the extent to which the existing bus services could be used by staff or pupils to travel to school and whether any infrastructure enhancements would be appropriate as part of the school expansion.
- Further assessment is required for the 'existing conditions' to fully identify existing parking behaviors, in particular the overspill demand to ensure these are addressed appropriately and sufficiently in the proposals.
- Further information is required as to how car parking will be managed.
- Information regarding the required staff parking levels and allocation of 72 staff spaces.
- Whilst it is accepted that circumstances with Covid-19 and lockdowns meant that the applicant could not survey traffic movements or parking it is recommended that, when possible, traffic and parking surveys are carried out.
- The applicant should provide evidence that the parking provision for the doctor's surgery has been agreed and will not result in overspill of parking into the school assigned spaces / on street.
- More detail should be provided as to how car sharing will be encouraged and managed.
- For cycle parking WCBC's cycle parking standards must be followed.
- WCBC would like clarification regarding the proposed Borrass CP School Courtyard Playground which is adjacent to the servicing area and the pedestrian crossing that vehicles appear to be reversing towards.
- The applicant needs to demonstrate that a waste collection vehicle, servicing the bin store of the proposed Welsh school site, would be able to turn safely within this area whilst vehicles are parked in all the parking spaces.

- It is recommended that road safety observations are carried out on Borrás Park Road at drop off and pick up times to ascertain if there are any pre-existing road safety issues.

A handwritten signature in black ink, appearing to be 'R. L. M.', is centered within a light gray rectangular box.

Chief Officer, Environment & Technical