MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO:	Jenni Perkins
Our Ref:	ET/DC/AC/2025/0337	**Your Ref:**	P/2025/0337
Date:	16/10/2025		

TOWN AND COUNTRY PLANNING ACT 1990

PROPOSAL: DYMCHWEL DAU ADEILAD YSTAFELL DDOSBARTH DDWBL A RHOI BLOC 4 YSTAFELL DDOSBARTH NEWYDD AR GYFER BABANOD/MEITHRINFA NEWYDD YN EU LLE (CAM 1). ADEILADU BLOC 4 YSTAFELL DDOSBARTH NEWYDD AR GYFER PLANT IAU (CAM 2) / DEMOLITION OF TWO DOUBLE CLASSROOM BUILDINGS AND REPLACEMENT WITH A NEW 4 CLASSROM BLOCK FOR INFANTS/NEW NURSERY (PHASE 1). CONSTRUCTION OF NEW 4 BLOCK CLASSROOM FOR JUNIORS (PHASE 2)

LOCATION: YSGOL ID HOOSON, HEOL CARADOC, RHOSLLANERCHRUGOG, WREXHAM, LL14 2DX

I refer to your consultation / email in respect of the above. The LHA set out below follows the same structure as set out in the applicants email dated 17th September 2025.

Construction Traffic Management Plan

The applicant has requested that the Construction Traffic Management Plan (CTMP) submitted with the application be approved rather than them having to submit a revised document following approval. However, given details of the scheme may change as part of the determination process, which then may affect the CTMP, the LHA would suggest the finalisation of the CTMP be dealt with as via a planning condition. Therefore, the following condition should be included:

Condition:
The development shall be carried out in strict accordance with the approved Construction Traffic Management Plan.

Travel Plan Framework

As with the Construction Management Plan, the applicant has also requested that a condition requiring a full travel plan prior conditioned be removed from any planning permission as a Framework Travel Plan has been submitted. The LHA accepts this in principal and will require the following condition to be included to ensure an adequate monitoring and mitigation strategy can be implemented should planning approval be granted.

Condition
The approved Travel Plan shall be subject to monitoring. Comprehensive monitoring surveys shall be undertaken and submitted to the Local Planning Authority for approval at the following intervals, unless otherwise agreed in writing by the Local Planning Authority: Select appropriate

Twelve months (1 year) following the first occupation of the development or substantial completion (whichever is sooner)
24 months (2 years) following the first occupation of the development
60 months (5 years) following the first occupation of the development

The monitoring reports shall include:
- *An analysis of the travel mode shared or all trips associated with the development*
- *A comparison of the actual travel patterns with the targets set out in the approved Travel Plan*
- *A review of the effectiveness of the Travel plan measures implemented*
- *A schedule of any necessary remedial or updated measure proposed to achieve the Travel Plan objective and targets with a timetable for their implementation*

Following the review of each monitoring report, the developer shall implement any necessary remedial or updated measure as required and approved in writing by the Local Planning Authority within the timescales specified in the approved Travel Plan.

Closing Paragraph
This section referenced the LHA response dated 9th June 2025 which concluded that a number of issues outlined in the LHA initial response had not been addressed the Travel Plan Framework or the Construction Traffic Management Plan.

A meeting was held between the applicant and the LHA on the 17th June 2025 in which a number of matters were discussed, however no minutes were provided and discussions on site do not constitute a formal LHA consultation response. **It is the view of the LHA that the points raised in the initial LHA consultation response are still required to be addressed.**

Access
The applicant has submitted Drawing DPL SK004. This shows that the applicant will provide upgraded crossing facilities in the form of drop kerb crossing with tactile paving on all four arms of the mini roundabout along Glanrafon & Heol Caradoc. **The LHA has reviewed the drawings and this is deemed acceptable.**

Parking and Turning Provision
There is currently a significant shortfall in parking on the site. Maximum car parking standards are set out in LPGN 16. The document recognises that ***"where the amount of parking provided is below the maximum, the Council will need to be satisfied that this is appropriate for the likely level of demand, without undermining requirements for inclusive access"*** The existing school has a GFA of 2,026m^2. Based on LPGN 16 (class D1 Use), the existing school would require a maximum of 83 parking spaces whereas only 54 spaces are currently provided. This represents a shortfall of 29 spaces.

Following Phase 2 of the development, the maximum car parking requirement would be 110 spaces (based on a GFA of 2710m^2). The proposals for Phase 2 are to increase car parking numbers by 5 spaces. The represents a shortfall in car parking of 46 spaces.

The existing modal splits for pupils are contained in the applicant Travel Plan have been extracted and are shown in the table below along with the number of pupils travelling by each mode for the existing school and following Phase 2 of the site.

Modal Split	Mode share	Survey	Existing School (Phase 1)	Phase 2
Car	75.8%	144	196	318
Bus	0.5%	1	1	2
School Transport	0.0%	0	0	0
Foot	21.6%	41	56	91
Cycle	0.5%	1	1	2

M/C	0.0%	0	0	0
Other	1.6%	3	4	7
Total	**100.0%**	**190**	**259**	**420**

As shown in the table, it is estimated that 196 pupils currently travel by car. Based on these same modal splits, 318 pupils would travel by car following Phase 2 of the scheme.

The Travel Plan has provided data regarding the number of vehicle occupants per vehicle and the travel plan has estimated that 91 cars travelling to and from the site by the 137 pupils who answered this question. The Travel Plan and Transport Assessment do not provided estimations of the overall number of car trips generated by the existing school or following phase 2. However, using the proportional splits provided by the applicant, it has been possible to determine the number by car.

Car Occupants	Percent	Survey (137 pupils)	Existing School (259 pupils)	Phase 2
1	39%	53	77	124
2	43%	29	42	68
3	11%	5	7	12
4	5%	2	2	4
5	2%	1	1	1
Total	**100%**	**90**	**129**	**210**

The table demonstrates that the likely increase in the number of car trips to the site in Phase 2 would be in the region of 81 which equates to 162 two-way trips. **This is clearly a significant increase in vehicles entering and exiting the site**. Furthermore, the car park surveys provided by the applicant clearly show that the existing car park is currently significantly over capacity in the PM peak hour.

The tables below summarise the results of the applicant's survey for each peak period with Phase 2 extrapolated based on the same proportions.

Time Period	% overall cars	Existing School (259 pupils)	Phase 2
07:30	3.10%	4	6
07:50	4.64%	6	10
08:10	13.16%	17	28
08:30	19.35%	25	41
08:50	42.57%	55	89
09:10	18.58%	24	39

Time Period	% overall cars	Existing School (259 pupils)	Phase 2
14:30	32.51%	42	68
14:50	60.37%	78	126
15:10	35.61%	46	75
15:30	6.97%	9	15
15:50	7.74%	10	16
16:10	6.97%	9	15

The tables demonstrate that the car park will be significantly over capacity, especially in the PM, when the car park would also over-capacity for an increased period of time. Note that this analysis assumes all spaces can be used including the 27 designated bays for staff, EV use and disabled users.

The LHA consider the increase in parking demand to be significant. This would likely result in A) queuing for the car park blocking back into the highway and / or B) lead to overspill of parking into the surrounding narrow residential streets. Whilst the LHA agree that the impact will be relatively short lived (at school pick up / drop off times). It will coincide with peak periods and periods where there would be a significant increase in pedestrian activity accessing the school, of which a high proportion would be children. Both of these potential risks would be detrimental to highway safety. The LHA cannot therefore support the proposals without adequate parking or drop-off provision.

Mitigation Measures

The mitigation measure proposed to manage car parking demand by the applicant are as follows:

- Improved circulation of car park;
- Improved car park layout;
- Travel Plan commitment;
- Improved access for pedestrians; and
- Improved and new cycle storage across the site.

The applicant has stated that the above measures are the mitigation strategy to manage the use of cars to and from the site. The applicant notes that this is a response to previous concerns raised regarding parking by the LHA. The above measures are welcomed, but the LHA do not consider they will have a sufficient impact to mitigate the increase in traffic and parking demand at the site. The improved car park layout will improve circulation and improve efficiency but does not address the short fall in parking capacity.

The aspiration of the Travel Plan is to reduce single occupancy car trips by 10%. To do this, the following measures are proposed:

Phase 1

- Cycle & Scooter Storage: Covered and secure parking for pupils and staff (4 spaces per classroom + 12 near studio hall).
- Staff Lockers: For storing outerwear to support active travel.
- Improved Crossing Facilities: Upgraded crossings at the site access mini-roundabout.
- EV Charging Points: Installed in the car park, with priority access for car sharers.
- Car Share Priority Spaces: Allocated for staff to encourage car sharing.

Phase 2

- Revised Car Park Layout - Adds 5 spaces and creates a one-way internal circulation system to reduce conflicts.

Ongoing

- Monitoring & Surveys:
    - Annual pupil and staff travel surveys.
    - Bi-annual car park usage surveys
- Governance & Engagement:
    - Involvement of Eco Council and school governors.
- Infrastructure Review:
    - Monitor cycle/scooter parking usage and expand if needed.
- Car Sharing Initiatives:
    - Staff: Dedicated spaces.
    - Parents: Information campaigns on benefits.
- EV Charging Expansion: Based on demand, with priority for car sharers.
- Training & Education:
    - Cycle training (WCBC).
    - Child pedestrian training.
    - Road safety (Kerbcraft campaign).
    - Health promotion and physical activity sessions.
- Walking Bus:
    - Trial routes within 800m during Walk to School Weeks.

    - Long-term implementation with WCBC support.
- Green Cross Code Promotion: Online resources shared with pupils.

The LHA welcome the above measures; however, these are unlikely to have a significant impact on car trips to school. The applicant has not provided any post code analysis within the Travel Plan so the LHA cannot determine if any above measures are feasible or would have an impact. The applicant has stated the following additional measure which could be implemented if needed:

- Staggered Start/End Times: To reduce peak car park usage.
- Car Park Access Restrictions: Potential limits for certain parent groups.

The Travel Plan has not provided details of how these would be implemented and managed, nor are these considered firm commitments.

Notwithstanding the above, even if the Travel Plan was successful in achieving a 10% reduction in car trips, the car park and drop-off would still be significantly over capacity.

Cycle Parking Shelters
The applicant has submitted a scale plan showing the location of the parking provision. These are summarised below:

Location	Type	Number of Spaces	Notes
Outside each new classroom	Bike/Scooter	4 per classroom (36 overall)	Positioned under canopies for weather protection
Near the studio hall	Bike/Scooter	12 spaces	Centralised provision for larger group use
Total	-	48 spaces	-

Parking Beat Surveys
Discussed above.

Lay-by / Dropping Off Point
The layby and dropping off point is welcome, however, the LHA does not consider this sufficient to manage parking demand at the site.

Swept Path of Refuse Vehicle
This was submitted as drawing DPL SK005 on 03/07/2025. This is considered acceptable.

Pedestrian Crossing Improvements
The applicant has submitted Drawing DPL SK004. This shows that the applicant will provide upgraded crossing facilities in the form of drop kerb crossing with tactile paving on all four arms of the mini roundabout along Glanrafon & Heol Caradoc. The LHA has reviewed the drawings and this is deemed acceptable.

Summary
The Local Highway Authority (LHA) has reviewed the proposed development at Ysgol ID Hooson, which includes the demolition of existing classroom blocks and construction of new facilities across two phases. While the submitted Construction Traffic Management Plan and Framework Travel Plan are accepted in principle, several critical concerns remain unresolved.

The proposed increase in pupil numbers will significantly intensify traffic and parking demand. Current on-site parking provision is already below the recommended standards, and Phase 2 will exacerbate this shortfall, leading to an estimated deficit of 46 spaces. Peak hour surveys indicate that the car park will be over capacity, particularly during afternoon pick-up times, posing safety risks due to vehicle overspill onto surrounding residential streets.

Although the applicant has proposed mitigation measures—such as improved circulation, cycle storage, and travel plan initiatives—these are unlikely to sufficiently offset the projected increase in car trips. Furthermore, the absence of postcode analysis and firm commitments to additional strategies (e.g. staggered timings or access restrictions) limits the effectiveness of the proposed mitigation.

Given the significant shortfall in parking provision and the associated safety concerns, **the LHA cannot support the application in its current form**.

KWEdwards
Contracts & Engineering Manager

On behalf of Chief Officer, Environment & Technical

Appendix

Highways Development Control Standard Advisory Note

In the interests of maintaining highway safety, and to avoid obstruction of the public highway (in contravention of the Highways Act), The Applicant is advised to coordinate with the highway authority at highwayroadworks@wrexham.gov.uk in advance of commencement of the development/works with respect to:

1. *Skip, scaffolding, hoarding or A frame/signage (Permit required for these items, if on the public highway);*
2. *Use of a parking space for a set down/delivery area;*
3. *Record a dilapidation survey of the adjacent carriageway prior to commencement (to avoid being ask to repair damage by the Applicant whilst carrying out their works);*
4. *If any lane closure or obstruction of the highway is required for a crane or similar;*
5. *Protection against dust and debris blowing onto the public highway*
6. *Construction traffic parking locally avoiding nuisance to others;*
7. *If the Applicant's scope of work includes new apparatus in the highway, such as new mains services then a Section 50 licence will be required. Insurances and demonstration of competency to carry out works in the public highway will be required.*
8. *Lowering of kerbs or minor pavement alterations require Section 184 agreement. Insurances and demonstration of competency to carry out works in the public highway will be required.*
9. *A section 278 agreement works agreement is required for more significant alterations to the existing highway*
10. *Any temporary works affecting traffic lights, [pedestrian/cycle road crossings, or bus stops require pre-planning and permits;*
11. *For applications with a private driveway (either existing or proposed) connecting onto the public highway, the following conditions of approval apply:*

    - *No surface water from the applicants site should be allowed to drain onto the public highway,*
    - *The first 5m* minimum (for residential property) should be hard paved, avoiding gravel or loose chippings form spreading.*
    - *No gate should be built in a location where it would result in a car obstructing the highway whilst being unlocked, and it should not swing out and over a pavement or any other part of the highway.*

    **The hard paved length and set back if required is subject to the applicants proposed vehicular length*

The applicants should allow a minimum of 4 weeks' notice for any of the above standard requirements, and 6-8 weeks for lane closures & road closures (lead times may change without notice subject to workload and complexity). Any works involving Trunk roads should be coordinated separately and directly with the North & Mid Wales trunk Road Agency. For larger sites with a significant impact upon the highway, a Construction Traffic Management Plan will be required.