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:	24/11/2025		

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 CLASS ROOM 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 has reviewed the Transport Update Note submitted in November 2025 in response to the concerns outlined in the LHA consultation dated 16 October 2025. While the update seeks to address issues relating to **car park size** and **Travel Plan delivery**, the LHA remains concerned that the proposed measures do not adequately mitigate the significant increase in traffic and parking demand associated with the development proposals.

Car Park Standards and Proposed Car Parking Provision

The applicant refers throughout to the Wales Parking Standards (2014) as a justification for a reduction in car parking spaces. This guidance results in a significantly different number of required parking spaces to that which is considered to be required by the LHA. The car parking standards adopted by the council and considered as the main policy position for the LHA and are as 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. This under provision of parking currently results in the car park operating over-capacity. This is recognised in the applicants own survey data which recorded 78 vehicles parked in the car park in the PM peak. This existing level of over capacity operation has been validated by site visits undertaken by the LHA which recorded 70 vehicles parked in the car park in the PM peak. This over demand results in inappropriate parking onsite. This included parking taking place on the grass verges, in turning heads and the outside of dedicated parking bays. This is demonstrated in the photographs below.







Phase 2 of the development proposes to increase the GFA to 2710m^2. For a new development of this size, the maximum car parking requirement would be 110 spaces. If no additional capacity is provided, this would represent a shortfall in parking onsite of 48 spaces.

Car Parking Provision

The applicant appears to contradict the proposed car parking provision in Section 4 of the Technical Note. The applicant confirms that the existing car park provides 57 spaces, with Phase 2 proposals adding five additional spaces and introducing a revised internal layout to improve circulation.
The transport note appears to suggest that these 62 spaces will never be available for use with a continued year on year reduction in car parking spaces. This proposal is replicated in the table below.

Stage	Total Constructed Spaces	Spaces Available after Restrictions
Existing	57	57
Phase 2 (post construction)	62	62
During Construction	62	53 (loss of 9 spaces for works)
Year 1	62	51 (additional 2 spaces barriered)
Year 2	62	49
Year 3	62	47
Year 4	62	45
Year 5	62	43

The LHA consider these measures to be counterintuitive given the overarching concern of the LHA is that the development does not have enough parking spaces provided. **The LHA require clarification on the above.**

The applicant has suggested that that a larger car park would encourage car use, aligning their assumption with Active Travel objectives. While the LHA supports modal shift, it's concern is not the principle of restraint but the **operational safety implications that are likely to result from**

significant under-provision. Surveys and on-site observations confirm that the existing car park is already significantly over capacity during peak periods, and Phase 2 will exacerbate this. The LHA is concerned this could lead to:

- Queuing within the site and blocking back onto Heol Caradoc;
- Overspill parking on narrow residential streets, impacting on the safe and efficient operation of these streets;
- Parking on and obstruction of Footways
- Result in increased conflict between vehicles and pedestrians, particularly vulnerable users such as children.

These impacts are contrary to TAN 18, which requires avoiding traffic hazards and represents a highway safety risk. The proposed increase of five spaces and reliance on circulation improvements are therefore considered wholly inadequate for the development.

Existing and Estimated Mode Share

The existing modal splits for pupils at the school have been determined by a 'hands up' survey and have previously been provided by the applicant. These 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**

The applicant has used National Travel Survey (NTS) data to estimate the potential for changes in mode shift. The applicant obtained pupil home-to-school distances from the education authority and these distances were grouped into bands: less than 1 km, 1 km to 1 mile, 1 mile to 2 km, and over 2 km. The applicant then applied NTS-derived percentages for active travel within these bands. The results are 82% for trips under one mile and 24% for trips between one and two miles were undertaken by walking and cycling while assuming all trips over 2 km would be car-based. This approach produced an estimated active travel potential mode share of 54% without any interventions, compared to the current observed rate of 22%.

The applicant used this analysis to propose that the existing car park size encourages car use and that restricting parking could significantly increase active travel and mitigate the shortfall in car parking provision. They forecast that, with measures such as limiting car park access for parents who live within 1 km and progressively reducing spaces, that active travel mode share could rise to 60%, reducing car-based trips to 40%. These figures are used to underpin the Travel Plan targets and are used to justify the significant under provision of parking spaces.

However, from the LHA's perspective, this approach is problematic. NTS data is based on surveys in England, and while it provides useful national benchmarks, these figures do not reflect local travel behavior in Wrexham, where car dependency may be higher due to rural catchments, lesser public transport, and differing travel habits. Applying assumptions such as 82% active travel for trips under one mile and 24% for trips between one and two miles without any interventions or strategies is overly optimistic and fails to account for local constraints like topography, weather, inadequate / narrow footways and parental safety concerns. The attractiveness and convenience of any walking route is as important as the distance walked.

Travel Plan Delivery

The Travel Plan proposes a phased approach to reducing car dependency and promoting sustainable travel modes. Key measures include:

- Pre-construction implementation with communication to parents and staff.
- Car park access restrictions: Stage 1 denies access to parents within 1 km; Stage 2 extends to 1 mile.
- Progressive removal of spaces: Two spaces per year, reducing from 62 to 43 spaces by Year 5.
- Physical improvements: Cycle/scooter storage, pedestrian crossings, EV chargers, and staff lockers.
- Operational measures: Annual surveys, walking bus trials, cycle training, and engagement with Eco Council.
- Targets: Reduce car use from 75.8% to 68%, increase walking to 26%, and cycling/scooter use to 5.5%.

The proposed access control - permit system raises operational concerns. Section 4.5.8 of the transport note states that restricting access will prevent overspill parking as parents will choose not to drive. The LHA do not agree with this and consider it highly likely that **Parents denied entry will park on nearby streets, creating congestion and safety risks during peak times**. The proposals do not explain how vehicles without permits will safely turn around at the entrance, which could lead to reversing maneuvers near pedestrians and exacerbate congestion. Without a designated turning area or clear mitigation strategy for overspill parking, these measures risk transferring the problem from the school site to surrounding roads.

The assumption that all parents living within 1 km will walk, also ignores the reality of linked trips (home–work–school), which significantly reduces the likelihood of walking even for short distances. Furthermore, future mode share estimates assume pupil home locations remain static despite an increase in numbers, which is unrealistic. As the school expands, catchment areas typically widen, increasing longer-distance trips and reinforcing car dependency.

The Travel Plan targets in Table 4.2 do not align with the applicant's own NTS-based analysis earlier in the document. The analysis suggests that 54% of pupils could reasonably travel by active modes without intervention, yet the Year 5 walking target is only 26%. This inconsistency undermines confidence in the robustness of the Travel Plan and raises questions about its deliverability and the Travel Plans ability to significantly lead to mode shift to offset the significant shortfall in parking provision.

Summary

The applicant has presented justification for the proposed level of staff and parent parking provision, identified previously by the LHA as a cause for concern. Despite this additional information, the LHA remain of the view that the proposals are not sufficient to manage likely demand for parking / drop off and that this is likely to result in overspill parking on the adjacent highway which is unsuitable to accommodate such activity and that this may result in road safety risks. As such the LHA cannot support the application in its current form.

Should the Local Planning Authority (LPA) recommend approval then the LHA would request that either Phase 2 of the proposals be contingent on the successful delivery of the Travel Plan or the following conditions be applied:

Condition 1: Car Parking Management Plan

Prior to the first occupation of the development, a detailed Car Parking Management Plan shall be submitted to and approved in writing by the Local Highway Authority.
The plan shall include, but not be limited to:

- Allocation of spaces for staff, visitors, and disabled users.
- Details of any permit system and enforcement arrangements.
- Measures to manage drop-off and pick-up safely, including turning arrangements for vehicles without permits.
- Overspill parking mitigation strategy.
- Phasing of any car park space reductions and monitoring arrangements.

The approved Car Parking Management Plan shall be implemented in full and maintained for the lifetime of the development unless otherwise agreed in writing by the Local Highway Authority.

Reason: To ensure safe and efficient operation of the car park, prevent overspill parking, and promote sustainable travel in accordance with local and national policy.

Condition 2: ModeShift STARS-Compliant Travel Plan
Prior to the first occupation of the development, a detailed Travel Plan shall be submitted to and approved in writing by the Local Highway Authority.

The Travel Plan shall:

- Be prepared in accordance with ModeShift STARS requirements.
- Achieve a minimum Silver accreditation within five years of first occupation.
- Include clear targets for modal shift, monitoring arrangements, and annual reporting.
- Set out measures to promote walking, cycling, car sharing, and public transport use.
- Include contingency actions if targets are not met.

The approved Travel Plan shall be implemented in full and maintained for a minimum of 10 years unless otherwise agreed in writing by the Local Highway Authority.

Reason: To promote sustainable travel choices and comply with Active Travel (Wales) Act and local transport policy.

Highway Safety and Operational Concerns

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.

KWEdwards

Contracts & Engineering Manager

On behalf of Chief Officer, Environment & Technical