MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO::	Jenni Perkins
Our Ref:	ET/DC/AC/2025/0337 Rev 4	**Your Ref:**	P/2025/0337
Date:	05/02/2025		

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's previous consultation responses has identified several fundamental concerns that the applicant would need to address to ensure safe and efficient access and operation of the local highway network. The first of these relates to the existing significant shortfall in the number of school car parking places. Both the applicant's data and the LHA's own observations have demonstrated that the car park is already operating under significant stress, with vehicles recorded parking on verges, turning heads and outside demarcated bays, resulting in congestion, compromised circulation and conflicts between vehicles and pedestrians. These issues are exacerbated at school peak times and reflect the shortfall in parking relative to the schools existing operation.
when assessed against the Council's parking standards, the additional five spaces proposed by the applicant in earlier submissions would not be sufficient to offset the considerable increase from 259 pupils currently to 420 pupils following phase 2. This represents an increase of 62%.

There were also concerns regarding the potential for overspill parking onto surrounding residential streets, particularly if parents were denied entry or discouraged from using the on-site car park (as was suggested in a previous iteration of travel plan). The LHA's ongoing concern that without a secured and enforceable strategy to manage turning movements, parking dispersion and footway protection, there is a high likelihood of conflict and obstruction on the public highway.

In addition, the LHA has sought greater certainty around mitigation proposals, including a ModeShift STARS-compliant Travel Plan achieving at least a Silver standard within five years, a robust Car Parking Management Plan, defined contingency measures where targets were not met, and a requirement that any increase toward the Phase 2 pupil capacity be contingent upon demonstrated success in reducing parking demand. These collective concerns established the context against which the updated December 2025 Travel Plan has been assessed.

Overview of Updates in the December 2025 Travel Plan

The LHA notes the Travel Plan's reference in Section 1.2 to the suggestion that those responsible for its delivery may have "little or no training," and therefore require a simplified document. While the LHA recognises the value of accessible guidance, it does not consider it appropriate or acceptable that the effective operation of a statutory Travel Plan should rely on individuals who lack the necessary competence or training. Given the significance of the Travel Plan in mitigating identified highway impacts, the LHA expects its delivery to be overseen by a suitably qualified, adequately trained individual. **Should planning permission be granted, ensuring that the Travel Plan is delivered by competent personnel is essential to maintaining safe and efficient operation of the local highway network**, and the LHA would anticipate that the school, as the responsible organisation, appoints a Travel Plan Coordinator (TPC) with the skills, authority and training proportional to the role's importance.

Notwithstanding the above, the updated Travel Plan introduces a more structured approach and presents several practical measures aimed at improving on-site conditions. These include enhanced facilities for cycling and scooting through covered and secure storage, staff lockers to accommodate active-travel equipment, and minor improvements to pedestrian crossing through upgraded dropped kerbs and tactile paving at the mini-roundabout. The Travel Plan also proposes a reconfiguration of the car park to improve circulation and create approximately five additional spaces (Phase 2), with the introduction of a one-way internal system intended to reduce the potential for conflict between vehicles and pedestrians. These are consistent with previous details provided by the applicant.

The governance and monitoring framework has also been strengthened with sections for the TPC, Eco Council representative and school governor details. The plan sets out annual hands-up surveys for pupils and annual staff surveys to track travel mode share over time, as well as bi-annual car-park utilisation counts to be conducted at peak periods by a member of TPC. This monitoring is intended to continue for a minimum of ten years, with involvement from the Eco Council and school governors to embed the Travel Plan within the school community. Targets have been established to reduce the pupil car mode share from a baseline of 75.8 percent to 72 percent by Year 2 and 68 percent by Year 5. These reductions are paired with proposed increases in average pupils per car, reflecting an intention to encourage informal car sharing as part of the school's everyday travel behaviour.

The Travel Plan also identifies that pupils living more than two miles away may be eligible for local authority provided school transport. This offers a potential opportunity for reducing some car trips, as each minibus could offset approximately ten individual car journeys. However, no quantification of the number of pupils is presented and therefore the reduction in car trips is available at this time.

Appendix B introduces a potential expansion area for an additional ten parking spaces at the school frontage, which, if delivered, would raise the number of marked spaces from 63 to approximately 73. Although this option represents a meaningful enhancement, it is presented as a future possibility rather than as a committed part of the planning application and therefore not guaranteed to be delivered.

Proposed Parking Provision

Despite the Travel Plan's efforts to improve the management of travel demand, the additional measures proposed do not fully address the significant gap between demand and available on-site parking capacity and adherence to the Wrexham Car Parking Standards. The reconfiguration of the car park and creation of approximately five committed new spaces offers some limited additional flexibility, but falls considerably short of bridging the difference between current conditions and the

levels of demand anticipated with the school's expansion to 420 pupils. The Travel Plan's reference to a future ten-space extension is encouraging conceptually, but in its present form it remains an indicative option without a secured delivery mechanism or defined triggers. As such, it cannot be considered reliable mitigation at this stage.

In reviewing projected parking demand using the Travel Plan's own metric of cars per 100 pupils, the pressure on the car park is clear. At the existing roll of approximately 259 pupils, baseline conditions equate to around 131 pupil-related cars at peak times. For 315 pupils, this rises to around 159 cars. For the Phase 2 capacity of 420 pupils, the equivalent baseline demand is approximately 212 cars. Even under an optimistic Year-5 target scenario, where car use falls to 40 cars per 100 pupils, the demand at 420 pupils is still around 168 cars far exceeding the currently proposed level of provision. These figures illustrate that without secured and timely intervention in the form of additional adequate parking spaces or clearly defined demand-management, the car park is likely to experience continued stress and queuing with the observed issues being exacerbated causing a potentially unacceptable safety risk for pupils and staff accessing the school.

The LHA also remains concerned about the risk of overspill parking into the surrounding residential area. While the revised Travel Plan more cautiously presents parent access restrictions as potential measures, it still does not contain a detailed or enforceable overspill management approach. In practical terms, unless clear arrangements are secured to manage turning movements, provide marshalled support at peak periods, or introduce temporary traffic management where necessary, there is a substantial risk that parents will choose to park within nearby streets where footways and residential amenity can be impacted. This represents a potential hazard, particularly for pedestrians, including young children walking to school. The absence of a clearly defined strategy continues to raise concern when considered against the requirements of TAN 18, which emphasises the importance of ensuring that development does not create or exacerbate traffic hazards.

In terms of modal shift, although the Travel Plan establishes clear intentions for increasing active travel and reducing reliance on private car use, its deliverability remains uncertain within the timescales proposed. The school's baseline travel behaviour shows a significant reliance on private cars, with only around one quarter of pupils using active travel modes. While the targets to increase active travel to 31.5 percent by Year 5 represent a positive move, they are dependent on factors beyond the school's direct control, including the quality and attractiveness of surrounding walking and cycling routes. Without secured off-site improvements or enforceable measures to influence parental behaviour, it is difficult to conclude that the Travel Plan can deliver modal shift at a scale that would meaningfully reduce parking demand.

The phasing and trigger mechanisms within the Travel Plan also require further development. While the plan recognises the importance of reviewing performance before progressing toward increased pupil capacity, it does not identify measurable thresholds that would activate further mitigation. For example, there are no defined car-park occupancy or car-trip count levels that would require the implementation of the ten-space expansion or the introduction of staggered start and finish times. Without such mechanisms, mitigation may not be deployed in a timely manner, potentially allowing parking pressure to escalate without intervention. Trigger-based mitigation is essential in ensuring that demand management keeps pace with pupil growth and that highway impacts remain within acceptable bounds.

Finally, while the Travel Plan includes appropriate references to construction-phase arrangements such as improved crossing facilities and coordination with the LHA regarding temporary highway works, these measures primarily relate to construction-phase management and do not mitigate the operational concerns relating to long-term parking stress, overspill risk or modal shift deliverability. While such coordination is important, it cannot address the underlying issues that remain with the operational phase of the school.

Summary and Conclusion

While the December 2025 Travel Plan represents an improvement over earlier submissions and introduces several helpful measures, it does not sufficiently address the Local Highway Authority's concerns regarding the capacity of the on-site car park, the likelihood of overspill into neighbouring streets, or the certainty of achieving meaningful modal shift within the necessary timeframes. In the

absence of secured additional parking provision, a clearly defined overspill management strategy, and trigger-based mitigation linked to actual performance, the LHA considers the residual impacts to remain unacceptable on highway safety and operational grounds. The application therefore cannot be supported as it does not fully accord with **Local Planning Guidance Note 16 (Parking Standards)** and does not demonstrate compliance with **TAN 18 (Transport)** in ensuring that the development avoids creating or exacerbating traffic hazards and maintains safe operation of the highway network.

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.