MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO:	Mathew Phillips
Our Ref:	ET/DC/AC/P/2025/0594 Rev 1	**Your Ref:**	P/2025/0594
Date:	01/05/2026		

TOWN AND COUNTRY PLANNING ACT 1990

PROPOSAL : INSTALLATION OF ADDITIONAL SEATING TO INCREASE KOP STAND CAPACITY UP TO 7,750

LOCATION: THE RACECOURSE, MOLD ROAD, WREXHAM, LL11 2AH

The Local Highway Authority (LHA) has reviewed the applicant's Post Application Transport Response (Revision P03, dated 19 March 2026), prepared by Buro Happold. This submission seeks to address the concerns raised in the LHA's consultation response dated 15 September 2025, particularly in relation to on-street and off-street parking impacts arising from the proposed increase in stadium capacity.

The LHA acknowledges that additional parking surveys have been undertaken for a 15:00 kick-off and that both off-street and on-street parking data have now been provided. The scope and methodology of the parking surveys were agreed with the LHA in advance of the surveys being undertaken. Whilst the LHA welcomes this additional information, for the reasons set out below concerns remain regarding the acceptability of the parking impacts, in particular the effects of on-street parking within residential areas close to the stadium.

The LHA acknowledges that the relevant planning test relates specifically to the highway and transport impacts arising from the additional 2,250 spectators over and above the consented scheme. The LHA's position is that this increase would give rise to a significant level of additional vehicle movements, as identified within the submitted Transport Assessment. Accordingly, the LHA has considered the submitted information and framed its assessment on the basis of the net additional impact associated with the proposed increase in capacity, rather than the operation of the existing or previously approved stadium use in isolation.

Baseline Parking Surveys

The LHA notes that the baseline traffic and parking surveys informing the submitted assessments were undertaken at a time when the operational capacity of the stadium was approximately 10,000 spectators. The baseline data therefore reflects historic operating conditions associated with this capacity and does not capture the effects of any subsequent increases in spectator numbers that have already been consented.

In particular, the LHA highlights that the baseline surveys pre-date the implementation of the consented KOP Stand scheme, which provides an additional 5,500 seats. As a result, the surveys do not reflect the traffic generation, parking demand, or on-street displacement associated with this already approved uplift in capacity. This represents an increase of approximately 55% in spectator numbers above those captured in the baseline surveys.

The consented KOP Stand scheme therefore constitutes committed development that is materially relevant when considering background conditions and when undertaking an assessment of the future impacts associated with the proposed additional 2,250 spectators.

It is important that this limitation of the baseline position is clearly acknowledged, as it directly affects how the survey results should be interpreted. Assessments based on a 10,000-spectator baseline do not reflect a realistic operational scenario of the consented scheme and cannot, in isolation, provide a robust basis for assessing the cumulative highway and parking impacts arising from further increases in stadium capacity.

Off-Street Car Parking Survey Findings

Updated off-street parking surveys were undertaken during a Saturday fixture with a 15:00 kick-off, which is considered to represent a robust scenario in terms of overlapping spectator demand and general weekend activity within the city centre. The scope and methodology of the surveys were agreed with the LHA in advance.

The surveys covered a range of public and privately operated car parks within Wrexham City Centre. The analysis appropriately disaggregates results by individual car parks and distinguishes clearly between:

- car parks that are publicly available and suitable for match-day spectator use; and
- car parks subject to operational restrictions, short-stay controls, or limited availability on match days.

Following the removal of car parks identified by the LHA as unsuitable for inclusion within the match-day capacity assessment (such as retail centre car parks subject to time restrictions), the remaining off-site car parks provide approximately 3,170 parking spaces.
Survey results indicate that peak match-day utilisation occurs shortly before kick-off. At 14:30, overall occupancy of the available off-street parking was recorded as 1,840 vehicles, equating to approximately 58–59% utilisation and indicating around 1,330 spaces available at that time. This is broadly consistent with the previous surveys submitted with the applicant's original Transport Assessment.

However, the Transport Assessment and Technical Note assume a combined car driver and passenger mode share of 57% and a vehicle occupancy of 2.4 persons per car. Based on these assumptions, the cumulative additional vehicle trips associated with the consented scheme (5,500 spectators) and the proposed development (2,250 spectators) would be in the region of 1,841 vehicles. This exceeds the 1,330 off-street spaces identified as available at peak time and suggests that additional demand would need to be accommodated elsewhere, including on the surrounding highway network.

On-Street Parking Survey Findings

The on-street parking surveys undertaken on 7 February 2026 identify a number of zones within the study area where parking stress increases materially at kick-off compared with the morning baseline.

While the applicant notes that average parking stress across the wider survey area remains below 80%, the LHA places greater weight on the localised impacts of match-day parking on residential streets. Several streets experience a clear increase in parked vehicles between the 09:00 and 15:00 survey periods, consistent with match-day related parking demand.

The submitted data confirms that 23 out of 102 surveyed zones record parking stress levels above 80% at the 15:00 kick-off. In several locations, parking demand is shown to be at or above capacity, increasing the likelihood of inappropriate parking behaviour and associated highway safety implications.

As with the off-street assessment, the on-street parking surveys do not provide a cumulative assessment of demand arising from both the consented KOP Stand scheme and the proposed capacity increase. The LHA requires this cumulative assessment to be undertaken in order to understand the specific impacts attributable to the additional 2,250 spectators.

Significance of the Additional Vehicle Demand

The Transport Assessment identifies that the proposal would generate approximately 535 additional vehicles on a match day. The LHA considers this to represent a substantial uplift in parking demand within an urban area characterised by largely unrestricted on-street parking and existing match-day pressures.

The LHA is not satisfied that reliance on high-level, aggregated spare capacity within city centre car parks alone would prevent further on-street displacement, unless robust and enforceable management measures are secured.

Interpretation of Traffic Survey Data

A key concern arises from the interpretation of the submitted survey results. The assessment considers the impact of the additional 2,250 spectators in isolation, assessed against a historic operational capacity of approximately 10,000 spectators. This approach fails to account for the consented KOP Stand extension of 5,500 spectators, which constitutes committed development and may be implemented independently of the current proposal.

Taken cumulatively, the stadium could operate at a capacity of up to 17,250 spectators, representing a 72.5% increase compared with the 10,000-spectator scenario on which the assessment is based. Such an increase would be expected to materially affect traffic generation, parking demand, and overspill pressures. However, this scale of change has not been reflected in either the baseline assumptions or the interpretation of the survey results.

This omission represents a fundamental flaw in the assessment, as it prevents the LHA from understanding the true future parking impacts of the proposal.

In addition, the presentation of results at an aggregated level across all off-street and on-street locations risks masking significant localised impacts, particularly within sensitive residential streets. Parking demand and stress are unlikely to be evenly distributed and cannot be robustly assessed on the basis of network-wide averages alone.

For avoidance of doubt, the application should provide a cumulative assessment in line with standard industry practice, comparing “with” and “without” development scenarios, specifically:

- **Without Development Scenario:**
  2026 baseline surveys (10,000 spectators) + consented KOP Stand (5,500 spectators)

- **With Development Scenario:**
  2026 baseline surveys (10,000 spectators) + consented KOP Stand (5,500 spectators) + proposed development (2,250 spectators)

In the absence of an assessment that reflects the cumulative increase from 10,000 to 17,250 spectators, and without disaggregated consideration of individual parking areas, the conclusions drawn underestimate the likely impacts of the proposals.

Use of Alternative Parking and the Travel Plan

The LHA notes the applicant's intention to further develop the existing Travel Plan and Match-day Access Strategy. However, no firm commitments are currently provided in relation to the identification, securing, or active management of alternative off-street parking facilities, nor are clear mechanisms proposed to discourage parking on nearby residential streets.

While reference has been made to potential arrangements with private car park operators, no details have been submitted as part of the application. The LHA notes that many comparable football clubs mitigate on-street parking pressures through formal agreements with private landowners, such as retail parks, employment sites, and educational establishments which can assist with mitigation if supported by stewarding, signage, and targeted communication with supporters.

However, at present, the Travel Plan does not demonstrate how such measures would be explored, secured, implemented, or monitored. In the absence of defined locations, agreed controls, and a clear strategy to redirect vehicles away from residential streets, the LHA is not satisfied that reliance on theoretical spare capacity alone would prevent additional pressure on the local highway network.

Parking Enforcement and Mitigation

The LHA is not currently in a position to determine the nature, scale, or extent of mitigation required, including whether enhanced parking enforcement, Traffic Regulation Orders, stewarding, or alternative parking provision would be sufficient or appropriate. This is because the submitted assessment does not yet provide a robust understanding of cumulative parking impacts arising from:

- the 2026 baseline operating conditions (approximately 10,000 spectators);
- the consented KOP Stand increase of 5,500 spectators; and
- the proposed increase of 2,250 spectators.

Without a cumulative assessment reflecting a realistic future operational scenario of up to 17,250 spectators, the LHA cannot quantify the extent of additional on-street overspill parking, identify the streets most affected, or determine whether impacts would be localised or more widespread. In the absence of this evidence, it is not possible to robustly justify or define mitigation measures that are necessary, directly related to the development, and proportionate in scale.

Accordingly, the LHA considers it would be premature to secure or agree mitigation measures, including any financial contributions towards match-day parking mitigation, prior to the submission of a robust cumulative assessment. Any mitigation proposed at this stage risks being either insufficient to address the actual impacts or disproportionate to the level of harm arising.

Summary

The LHA has reviewed the applicant's Post Application Transport Response (Revision P03, dated 19 March 2026), including the additional parking survey information submitted in response to earlier consultation comments. The LHA acknowledges that further off-street and on-street parking surveys have been undertaken for a 15:00 kick-off, with an agreed scope and methodology, and welcomes the provision of this additional data.

The LHA has significant concerns regarding the robustness of the assessment and the conclusions drawn. In particular, the assessment relies on a baseline reflecting an operational capacity of approximately 10,000 spectators and does not adequately account for the already consented KOP Stand extension of 5,500 spectators. This committed development represents a material uplift in spectator numbers and must form part of the baseline when assessing the impacts of the proposed additional 2,250 spectators.

As a result, the submitted analysis and interpretation do not reflect a realistic future operational scenario. The absence of a cumulative assessment prevents the LHA from fully understanding the combined effects of the consented and proposed capacity increases on traffic generation, off-street

parking availability, on-street parking stress, and the displacement of parking into nearby residential streets.

The LHA concludes that the applicant has not provided a sufficiently robust evidence base to demonstrate that the highway and parking impacts of the proposed development would be acceptable. In the absence of a cumulative assessment reflecting a realistic future operational scenario of up to 17,250 spectators, the LHA cannot fully understand the extent of additional vehicular demand, off-street parking shortfall, on-street parking displacement, or the resulting impacts on residential amenity and highway safety.

Accordingly, the LHA considers that the application, as currently submitted, does not demonstrate that the additional parking and highway impacts arising from the proposed increase in stadium capacity can be satisfactorily mitigated. The LHA recommends that a robust cumulative Transport Assessment and parking impact analysis be provided before the acceptability of the proposal, or any associated mitigation package, can be properly considered.

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.