BURO HAPPOLD

09 June 2026

Keith Edwards

Director of Transport

Environment and Technical Department
Wrexham County Borough Council

BY EMAIL ONLY

For the attention of Keith Edwards

Dear Sirs

RE: Planning Ref P/2025/0594 Kop Stand, The Racecourse, Mold Road, Wrexham LL11 2AH

We write in response to the Memo from your colleagues dated 1 May 2026 regarding post-planning submission transport discussions on the Additional Capacity Application for the Kop Stand.

As you are aware, Buro Happold (BH) are retained by Wrexham AFC to provide transport consultancy services in support of the planning application including preparation of the Transport Assessment (TA) submitted in July 2025.

Since submission, we have engaged in ongoing dialogue with Transport Officers at Wrexham CBC, particularly in relation to the potential parking impacts arising from the proposed increase in seating (15,500 approved, uplift of up to 2,250 now sought).

Your Memo of 15 September 2025 reviewed our TA and requested additional information to support your understanding of the development's transport impacts and associated mitigation. Specifically, WCBC requested:

- Comprehensive on-street parking surveys within an 800m radius.
- Updated off-street parking surveys during peak periods (e.g., 3:00pm kick-offs).
- Disaggregated analysis of car park usage and capacity.
- Clarification of which car parks are included in the capacity assessment.
- Further information is required on the proposed cycle parking provision.

In response BH developed a survey scope. Wrexham CBC Transport insisted that a more extensive scope of parking surveys was undertaken representing a significant dataset and cost (£40,000+). The surveys were undertaken in early February 2026 and the results of these surveys were presented at a meeting with your colleagues on 17 March 2026 and subsequently documented in our report dated 19 March 2026 titled *'Post Application Transport Response'*. It was anticipated that this submission would form the basis for further discussion regarding next steps, including any additional analysis or mitigation measures, such as updates to the Travel Plan and I note that the Planning Consultant sent a number of follow up messages seeking feedback.

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However, Wrexham AFC were surprised to receive your Memo of 1 May 2026 from a local councillor. Wrexham CBC did not engage in any prior discussion with the Applicant team. The memo characterises the *"BH Post Application Transport Response"* report as containing "omissions" and "fundamental flaws", a position with which we strongly disagree and consider to be a misrepresentation of the report's purpose.

For clarity, the BH report was a direct response to Wrexham CBC's requests and it was not intended to constitute a Transport Assessment or addendum. As set out explicitly in paragraphs 2.1.1 and 2.1.2, its purpose was to respond directly to the specific matters raised in Wrexham CBC's Memo of 15 September 2025, as summarised in the bullets above. The BH report does not seek to undertake a comprehensive reassessment of transport impacts, nor does it address cumulative impact scenarios involving baseline capacity and consented schemes, which have now been requested in your Memo of 1 May 2026.

In this context, it is of concern that these additional requirements were not raised at or following the 17 March meeting, and that they have only been formalised almost six weeks later. The Wrexham AFC team has sought proactive and collaborative dialogue throughout the pre-application and post-submission periods. Our expectation had been that Wrexham CBC would review the submitted data and engage in further discussion if required. At the time, the extent of further analysis required was not clear, particularly given the inherent limitations of the dataset that Wrexham CBC Transport requested.

At our meeting of 20 May 2026, we reiterated our position that the proper analysis of the Kop Stand capacity ought to be a multi-modal analysis, an understanding of existing and future measures, and the adoption of a condition for a full Travel Plan (replicating the wording from the existing Kop Stand permission). We also expressed concerns that further surveys and/or data collection may be necessary to robustly address the newly requested information. Even with additional data, any such analysis would likely be subject to significant uncertainty due to reliance on a wide range of assumptions, and in our experience of other stadium development projects this is not the type of analysis typically undertaken.

In discussions with Wrexham AFC, we are committed to progressing an update to the approved 2023 Framework Travel Plan, with particular focus on enhanced measures and commitments aimed at promoting a shift towards more sustainable travel modes. This will form a key component of the mitigation strategy and will be shared with Wrexham CBC Transport and Planning shortly.

It is important note that since the approved Kop Stand in January 2023, the transport matters at regularly sold-out games have been managed successfully by Wrexham AFC, Wrexham CBC and the emergency services. This has included the addition of the temporary Kop Stand (3,300), FA Cup Games with Premier League opposition, short-notice re-arranged games and so on. Wrexham AFC is also liaising with Wrexham Gateway partners, including Transport for Wales and the Welsh Government.

We trust that, moving forward, we welcome the opportunity to agree a clear and proportionate framework to resolve any outstanding matters and progress the Additional Capacity Application towards determination.

Yours sincerely
on behalf of Buro Happold

[redacted]

Chris Mullett
Director
[redacted]

CC. Matthew Phillips, WCBC Planning
Wrexham AFC