MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO:	Mathew Philips
Our Ref:	ET/DC/AC/P/2025/0594 Res 3	**Your Ref:**	P/2025/0594
Date:	18/09/2026		

TOWN AND COUNTRY PLANNING ACT 1990

Following the Local Highway Authority's (LHA) consultation response dated 1 May 2026, the applicant has submitted additional information in support of the application, namely a parking analysis and an update to the Interim Travel Plan. The purpose of these submissions is to address the outstanding concerns previously raised regarding cumulative parking demand, parking displacement, the adequacy of available parking provision, and the effectiveness of the proposed mitigation measures associated with the proposed increase in stadium capacity from 15,500 to 17,750 spectators.

Previous Highway Concerns
In summary, the previous consultation response identified a fundamental concern relating to the absence of a cumulative parking assessment. Specifically, the applicant had not demonstrated the combined parking and highway impacts arising from:

- Existing baseline matchday conditions (circa 10,000 spectators);
- The already consented increase in capacity associated with the approved Kop Stand (5,500 spectators; and
- The additional uplift in capacity proposed under the proposed application (2,250 spectators).

It was considered that without a cumulative assessment the applicant had not identified the likely scale of future parking demand, parking displacement and potential highway impacts.

The applicant has now undertaken a cumulative parking assessment which specifically assesses both the consented 15,500-capacity stadium and the proposed 17,750-capacity stadium. The results of this is summarised below.

Parking Analysis

Survey Methodology and Baseline Position
The parking assessment is informed by parking surveys undertaken during the Wrexham AFC v Millwall fixture on 7 February 2026. The surveys recorded parking demand associated with an attendance of 10,663 spectators and were undertaken using a survey methodology that had previously been agreed with the Local Highway Authority. The assessment also utilises supporter travel survey information and Travel Plan assumptions.

The applicant assessed the off-street parking supply previously agreed with the Council comprising 3,325 parking spaces across the following nine car parks within Wrexham:

- Wrexham University – 858 spaces
- *Wrexham General Station – 82 spaces.
- Premier Inn – 75 spaces.
- Crescent Road – 156 spaces.
- Ty Pawb – 326 spaces.
- St Georges Crescent – 74 spaces.
- Waterworld – 272 spaces.
- Eagles Meadow – 996 spaces. – Free
- Island Green – 486 spaces.

*It should be noted that the Wrexham General Station is not available for matchday parking.

The survey results identified:

- 1,894 occupied parking spaces immediately prior to kick-off;
- Approximately 57% utilisation of the approved parking stock; and
- Approximately 1,431 available spaces.

The applicant therefore concluded that substantial spare capacity currently exists within the off-street parking supply when considering the existing operation of the stadium. The LHA recognises that this baseline position provides an appropriate reference point against which the future parking impacts of both the consented and proposed developments can be assessed. The applicant has subsequently undertaken a series of cumulative parking scenarios which assess the approved uplift in capacity to 15,500 spectators and the further proposed increase to 17,750 spectators. This has enabled consideration of how the available parking capacity changes as spectator numbers increase.

The applicant has then considered a number of scenarios to assess the cumulative impacts of the proposed development. These are summarised below.

Scenario 2a: Consented Stadium Capacity (15,500 Spectators)
The first future year assessment considers the consented 15,500-capacity stadium using existing travel behaviour assumptions. The assessment assumes:

- A private car mode share of 57% derived from supporter travel survey data; and
- An average vehicle occupancy of 2.4 persons per vehicle.

The LHA notes that the assumed vehicle occupancy rate of 2.4 persons per vehicle has not been derived from surveys undertaken in relation to the proposed development or the Racecourse Ground. Instead, the figure has been taken from survey data used to inform the Transport Assessment associated with the Anfield stadium expansion. Whilst recognising that travel characteristics and supporter catchments may differ between the two venues, the LHA considers the use of this assumption to be acceptable for the purposes of undertaking a strategic parking assessment at this stage. However, given that the conclusions of the parking assessment are partially dependent upon vehicle occupancy rates, the LHA considers that should permission be granted, actual vehicle occupancy should be established through baseline monitoring undertaken as part of a Full Travel Plan following first occupation of the development. This will allow the assumptions used within the assessment to be validated and provide a robust baseline against which future Travel Plan performance can be monitored.

With the above assumptions, parking demand increases to approximately 3,045 vehicles. This represents approximately 92% utilisation of the off-street parking within the town centre and leaves approximately 280 parking spaces available with no parking overspill is forecast. However, this assumes that visitors to the ground will use the available car parks, including those with charges and not park on-street.

The LHA acknowledges that this assessment addresses a key concern raised within the previous consultation response by providing a cumulative assessment of the consented development. However, whilst the assessment demonstrates theoretical capacity within the approved off-street

parking supply, an overall utilisation rate of approximately 92% would represent a relatively high level of parking demand. In practice, this level of utilisation may reduce the degree of flexibility available within the parking network and would be increasingly reliant upon spectators making effective use of the full range of approved parking facilities. In addition, this would also reduce the available car parking supply for other users of town centre. The assessment therefore demonstrates that the consented stadium capacity is capable of being accommodated within the available off-street parking stock, albeit with a relatively limited level of remaining reserve capacity assuming all spectators park in the available car parks which would be unlikely.

Scenario 2b: Consented Stadium Capacity with Travel Plan Measures

The applicant then considers the consented stadium capacity assuming successful implementation of Travel Plan. A Travel Plan is a document / plan which contains a package of measures and commitments designed to promote sustainable travel choices, reduce reliance on private car use, and manage the transport impacts of development. The applicant has assumed the following changes to private car share and vehicle occupancy as a result of the successful implementation a Travel Plan.

This assessment assumes:

- Reduction in private car mode share from 57% to 52%; and
- Increase in vehicle occupancy from 2.4 to 2.6 persons per vehicle.

Parking demand reduces to approximately 2,463 vehicles leaving approximately 862 spaces available within the approved off-street parking stock.

The applicant concludes that implementation of the Travel Plan would materially reduce parking demand associated with the consented scheme and provide significant reserve parking capacity

Assessment of the Proposed Development (17,750 Spectators)

The applicant has subsequently assessed the cumulative impacts associated with the proposed increase in stadium capacity to 17,750 spectators assuming existing travel behaviour remains unchanged. Under these assumptions, parking demand is forecast to increase to approximately 3,580 vehicles, exceeding the approved off-street parking supply of 3,325 spaces by approximately 255 vehicles. The applicant identifies this as a theoretical worst-case scenario whereby all additional parking demand seeks to utilise the available off-street car parks.

Recognising that not all spectators would necessarily seek to park within formal off-street parking facilities, the applicant undertook a series of sensitivity tests which considered varying levels of off-street parking utilisation by spectators. These scenarios assumed that between 10% and 20% of parking demand would instead be accommodated within the surrounding on-street network.

Under the 90% off-street utilisation scenario, parking demand would exceed available off-street capacity by approximately 87 spaces, resulting in approximately 424 vehicles requiring accommodation on surrounding streets. Under the 85% off-street utilisation scenario, approximately 508 vehicles would require to be accommodated on-street. The applicant ultimately identifies the 80% off-street utilisation scenario as the principal assessment scenario, under which approximately 592 vehicles are assumed to park on surrounding streets whilst approximately 251 spaces remain available within the available off-street car parks.

Assessment Summary

The assessment therefore concludes that, in the absence of Travel Plan measures, the proposed increase in stadium capacity would result in a substantial increase in parking demand and a consequential increase in reliance upon both the off-street parking stock and would require spectators to park on-street.

On-Street Parking Assessment

In response to concerns previously raised by the LHA regarding parking displacement into surrounding residential areas, the applicant undertook parking surveys across 103 on-street parking areas surrounding the stadium. -

The identified matchday parking areas are located predominately within the residential areas surrounding the stadium.

The applicant calculates that these locations provide approximately 1,464 on-street parking spaces. Based upon the principal assessment scenario, the applicant redistributed the forecast 592 displaced vehicles across these locations and concluded that occupancy would increase to approximately 1,415 vehicles, equating to approximately 97% utilisation of the identified parking stock. On this basis, the applicant concludes that sufficient capacity exists within the surveyed parking network to accommodate the forecast displaced demand associated with the proposed increase in capacity and that the development could operate without reliance upon additional parking controls.

The LHA acknowledges that the applicant has undertaken more detailed assessment work than previously submitted and has sought to address concerns regarding cumulative parking impacts and parking displacement. The assessment demonstrates that, at a strategic network level, there is capacity available within both the off-street car parking supply and wider on-street parking network, (based on the applicant's capacity assumptions on the latter)

However, the LHA does not fully agree with the applicant's conclusion that the proposed development can be accommodated without reliance upon additional mitigation measures or parking management controls.

The applicant's conclusions are heavily dependent upon assumptions regarding the capacity of individual streets and the redistribution of displaced vehicles across a large number of streets. Whilst such assumptions may be appropriate for the purposes at a strategic level, the capacities assigned to individual streets represent theoretical values and should not necessarily be interpreted as reflecting the amount of parking that can be accommodated comfortably, efficiently or safely in practice. Furthermore, parking demand is unlikely to distribute across the broader parking network and spectators are likely to continue seeking parking within locations closest to the stadium and /or in relation to route into Wrexham.

Consequently, whilst the assessment demonstrates available capacity at a network level, the LHA considers that there remains potential for localised parking stress, parking displacement and associated residential amenity impacts within those streets located closest to the stadium. This is evident in the applicant's analysis which shows that 26 of the streets assessed, reach 100% capacity or in some cases over 100% which may imply inappropriate parking is occuring. The LHA therefore considers that, in the absence of appropriate mitigation measures, the proposed increase in stadium capacity is likely to result in additional parking demand being displaced into surrounding residential areas which is likely to lead to nuisance/problematic parking. Whilst the precise extent of this displacement cannot be quantified with certainty, the applicant's own assessment demonstrates that between approximately 255 to 592 additional vehicles may require accommodation outside the approved off-street parking stock depending upon the scenario assessed, in addition to those spectators who currently park in these streets.

Interim Travel Plan Review

The application is accompanied by an updated Interim Travel Plan which identifies a broad range of initiatives intended to encourage travel by sustainable modes and reduce trip-making by private car. The document includes measures relating to walking and cycling, public transport improvements, park and ride opportunities, coach travel, car sharing initiatives, travel information and ongoing engagement with key stakeholders including the Council, Transport for Wales, public transport operators and the wider Wrexham Gateway partnership.

The LHA welcomes the applicant's commitment to developing and implementing these measures and acknowledges that they have the potential to reduce parking demand associated with both the consented and proposed stadium capacities.

The applicant subsequently assesses a Travel Plan scenario which assumes:

- A reduction in private car mode share from 57% to 52%; and
- An increase in average vehicle occupancy from 2.4 to 2.6 persons per vehicle.

Under these assumptions, parking demand associated with the proposed 17,750-capacity stadium is forecast to reduce to approximately 2,914 vehicles, leaving approximately 411 spaces available within

the assessed off-street carparks and eliminating the requirement for parking overspill onto surrounding residential streets. The applicant therefore concludes that successful implementation of Travel Plan measures would enable the proposed development to be accommodated entirely within the approved off-street parking network.

However, the LHA considers that the submitted Interim Travel Plan remains too high-level in nature and should be viewed as a framework document rather than a fully developed Travel Plan capable of securing the mitigation relied upon within the parking assessment. This is expected as it has been prepared pre-planning approval.

Given the importance of this as a method of mitigation, the LHA require a robust Full Travel Plan with appropriate measures, targets and remedial measures (should the travel plan targets not be achieved) for the full stadium should planning approval be provided. This should include as a minimum (all to be agreed in advance with the LHA):

- A robust baseline position based on surveys undertaken following operation of the completed development;
- Modal share targets;
- Vehicle occupancy targets;
- Defined survey methodologies;
- Monitoring frequencies;
- Trigger thresholds identifying when intervention is required;
- Review mechanisms; and
- Specific remedial measures should the Travel Plan objectives not be achieved.

Given that the acceptability of the proposed development relies heavily upon achieving the modal shift and vehicle occupancy assumptions used within the parking assessment, the LHA considers it essential that a robust Full Travel Plan is secured through planning condition prior to first use of the development.

The Full Travel Plan should include the appointment of a Travel Plan Coordinator and should establish a robust baseline position following operation of the completed development. Annual monitoring should include travel mode share, vehicle occupancy rates, utilisation of approved parking facilities, parking accumulation surveys and parking-related complaints. The Travel Plan should also include measurable targets, clearly defined monitoring arrangements and a review mechanism capable of identifying when intervention is required. Annual travel surveys should be undertaken.

Mitigation and Future Review Mechanism
The LHA considers that the Travel Plan forms the principal mitigation relied upon by the applicant to address parking impacts associated with the proposed increase in stadium capacity. It is therefore imperative that appropriate mitigation measures are secured through planning condition and that a suitable mechanism exists should those measures fail to achieve the anticipated outcomes.

Should subsequent monitoring demonstrate that agreed Travel Plan targets are not being achieved, or that unacceptable parking displacement continues to occur within surrounding residential areas, the Club will be required to undertake a formal review of available mitigation measures and prepare an action plan identifying how those impacts will be addressed.

Such measures need to include:

- Additional off-site parking provision;
- Expansion of park and ride facilities;
- Enhanced shuttle bus services;
- Further sustainable transport initiatives;
- Matchday parking management measures; and
- Contributions towards parking management measures where evidence demonstrates these are necessary.

The LHA therefore supports the inclusion of a strengthened Travel Plan condition together with an appropriate Planning Obligation to provide a robust and enforceable backstop mechanism should the Travel Plan not achieve the outcomes relied upon within the applicant's assessment.

Conclusion
The LHA acknowledges that the applicant has now addressed the principal concern identified within the consultation response dated 1 May 2026 by undertaking a cumulative parking assessment which considers the existing operation of the stadium, the consented increase in capacity and the proposed additional uplift in capacity. The assessment demonstrates that the proposed development is likely to increase parking demand and, in the absence of mitigation measures, is likely to result in additional parking displacement into surrounding residential streets.

The LHA does not agree with the applicant's conclusion that the proposed increase in stadium capacity can be accommodated without reliance upon additional parking controls or mitigation measures. Whilst the assessment demonstrates theoretical capacity within the wider parking network, the LHA considers that there remains a realistic prospect of localised parking stress occurring within residential streets closest to the stadium.

The LHA considers that the applicant's preferred mitigation strategy, namely the successful implementation of Travel Plan measures, provides an appropriate means of addressing these impacts. However, the submitted Interim Travel Plan lacks sufficient detail at this stage and must therefore form the basis for a more comprehensive Full Travel Plan secured through planning condition.

Accordingly, the Local Highway Authority raises **no objection**, subject to:

1. A suitably worded Travel Plan condition requiring the submission, approval, implementation and monitoring of a Full Travel Plan incorporating baseline surveys, measurable targets, monitoring arrangements, review procedures, trigger thresholds and remedial measures; and
2. An appropriate Planning Obligation securing a mechanism for reviewing, funding and implementing additional mitigation measures where future monitoring demonstrates that the agreed Travel Plan objectives are not being achieved.

Suggested Condition

Before the development hereby permitted is first used, a Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The Travel Plan shall include but not be limited to:

i. Measures to reduce the impact of vehicle movements on the operation of Junction 5 of the A483 on match days and non-match day events (e.g staggering of events times);
ii. Measures to encourage sustainable transport options and reduce the need to travel to and from the football and non-football events held at the site by private motor vehicle;
iii. The timing for the implementation of such measures.
iv. Targets for a modal shift in travel to and from football and non-football events held at the site by modes of other than the private motor vehicle;
v. A scheme of annual monitoring for a period of 5 years to be undertaken on the anniversary of the first use of the stadium.

The development shall be undertaken in accordance with the approved Travel Plan. Annual monitoring reports shall be submitted to the Local Planning Authority within one month of their completion along with details of changes to the Travel Plan in light of the findings of the annual monitoring reports.

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.