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4 August 2021

Wrexham CBC Planning Dept
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(By email only)

For the attention of the case officer Matthew Phillips

P/2021/0680 Proposed School Development, Nine Acre Playing Field

Highway Planning Services has been appointed by Nine Acre Residents Association to assess the above planning submission and if appropriate, provide a written response to the planning authority. The submitted documents, with particular emphasis on the Transport Statement produced by Development Planning Limited, have been considered.

On behalf of the Nine Acre Residents Association, I lodge a formal objection to development proposals on the grounds of an inadequate assessment of the potential highway impact resulting from the development proposals to the detriment of highway operations and highway safety.

The Transport Statement is considered inadequate, containing inaccurate assumptions, estimates and data much of which has been collected during a period of abnormal traffic conditions. A full Transport Assessment should be completed including a more in depth survey of the residential distribution of pupils, existing and future travel modes and based on traffic surveys undertaken at a more appropriate period when “normal” traffic conditions have resumed. Several assumptions made within the submitted Transport Statement that appear to provide an unjustified bias and support to the Councils objective of providing a new school on this site.

The following list highlights the main areas of concern however for further information I have appended a clause by clause appraisal of the Highway Statement.

MAIN AREAS OF CONCERN

1. The application is supported by a Transport Statement the contents of which fall short of the requirements of a Transport Assessment. TAN 18 Appendix D para-D.5 requires all new schools to be subject to a **full Transport Assessment**. The TIS resulting from the assessment “**should as a minimum include the creation or improvement of safe cycling and walking routes, restricting car usage around schools.**” etc. There is nowhere within the

application that the provision of new or improved cycle routes is considered; consideration of walking routes is limited to the immediate vicinity of the site and there has been no consideration of the restriction of car use.

2. In general, assessments should be based on normal traffic flow and usage conditions (e.g., non-school holiday periods, typical weather conditions) but it may be necessary to consider the implications for any regular peak traffic and usage periods (such as rush hours). Projections should use local traffic forecasts such as TEMPRO drawing where necessary on National Road Traffic Forecasts for traffic data.

DPL have acknowledge that due to corona virus restrictions they have been unable to fully assess traffic conditions and travel requirements and have only made “best endeavors to provide accurate information” within their report. The submission of this application is at best considered premature and should be refused until verified information can be collected and properly considered.

3. There has been no attempt to consider the distribution of residential addresses of existing pupils or to consider how a change in location of the school will affect travel patterns. The only assessment of travel behavior has been from a show of hands survey of existing pupils (primary, infant and possibly nursery aged children) with no attempt to include parents or staff; to what extent can the results of such a survey be relied upon to generate an accurate assessment of modal choice and traffic movements?
4. Part 1 included a study of Westminster Drive but failed to provide a study of Rhosnesni Lane or Park Avenue or Chester Road roundabout with Rhosnesni Lane.
5. The level of on-site parking provision (especially staff parking) appears to be excessive; there would appear to have been no attempt to abide by the maximum numbers specified by WCBC Local Planning Guidance Note 16 the result of which is a failure to restrict vehicular movements in the vicinity of the school.
6. The Transport Statement fails to consider or even acknowledge the requirements of Active Travel Wales Regulations.
7. The suggested Safe Routes to School studies have not considered the WCBC standard assessment criteria and should extend to the full area identified within the walking isochrones rather than a simple review of traffic accident history in the immediate vicinity of the site.

8. There is an inadequate level of detail in respect of proposed improvements to footway provision.
9. There has been no assessment of the impact of additional traffic on the safe operation of sub-standard junctions in the vicinity of the site. Junctions at either end of Westminster Drive cause particular concern provided with inadequate junction radii and severely restricted visibility splays. The visibility available at the Westminster Drive/Park Avenue junction is restricted to approximately 12m by the avenue of trees.
10. There has been no consideration of bus routes to the site or how these will be restricted by the shared use of buses with other schools, particularly St Josephs.
11. The report fails to accurately assess traffic generation issues. The transport statement underestimates the number of vehicles likely to go to the site at pick up / drop off periods. The presumption that just 100 vehicles will drop off in the morning period is highly questionable especially when considering a capacity of 360 pupils and that this is a faith school which will traditionally draw pupils from a wider area than the standard state school. Due to the excessive numbers of parents driving to schools, the additional traffic generated by the school drop off/pick up creates traffic congestion outside the majority of schools throughout County. Without accurate data, it is impossible to quantify traffic generation figures but there is potential for up to 200 parental drop-offs/pick-ups on a daily basis. Rather than distributed through the full 08:00-09:00 assessment period, these trips are likely to be concentrated into a half hour period. This degree of additional traffic movements is likely to create congestion on roads already heavily trafficked at school peak hours.
12. The transport statement does not clarify the direction of travel into or out of the site for parental vehicles or for the busses. The route choice and direction of travel is critical to determining the traffic flows and assessment of the degree of impact.
13. WCBC highway department has a longstanding and well documented history of parking issues along Westminster Drive; senior highway officers have been involved in discussions there for a number of years. Despite proposed parking restrictions, any significant increase in the number of vehicular movements is likely to impact on the safe operation of this road.
14. The safety proposals include significant amounts of traffic calming and new parking restrictions; these are subject to highway legislation requiring separate public consultation exercises; to what extent can delivery of these requirements be relied upon?

15. The transport statement fails to address the significant concerns expressed by the local residents who it is understood have endured parking problems for years. Any commuter parking displaced by the introduction of parking restrictions on Westminster Drive is likely to impact on the amenity of neighbouring residents and the operation of the surrounding highway network.

Although not highway matters there are two additional points of concern:

16. A proposal to create hard surfacing on approximately 33% of the existing field generates local concern in relation to the management of surface water run-off. Whilst it is accepted that all significant developments are subject to separate SAB approval, surface water management is also a planning concern in relation to a development of this nature, situated in an area with a known flood risk.
17. The proposed widening of the footway to the north of Rhosnesni Lane and the new footway connection through to the Beeches, will result in construction works under the canopy of existing established trees. The WCBC arboricultural officer may need to consider the impact of construction works which may detrimentally impact on the trees.

Yours sincerely,

CG Simpson

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Highway Planning Services

Appraisal of the DPL Transport Statement

The paragraph numbers below relate to the paragraph numbers contained in DPL's Transport Statement dated March 2021

1.1.1 DPL have been commissioned by WCBC to provide a Transport Statement for the proposed development of a new primary school at Nine Acres

Comment: There doesn't appear to have been a Scoping Study undertaken prior to the transport assessment being submitted. Welsh Government Technical Advice Note 18 outlines what the early discussion between the developer and Local Authority should involve, such as:

- a) The content of the assessment
- b) Any junctions which need to be analysed with times /days of the week analysis should take place

1.3.1 A hands-up travel survey has been undertaken of pupils at the existing school. Of these, 34% travel to school by sustainable travel modes.

Comment: The report lacks any detail of the questions asked of the pupils or any detailed response from the questions. It would appear that all age groups including infants were questioned but no attempt made to question the parents/guardians responsible for arranging transport. To what extent can a child's response be relied upon when the information is essential to justify a technical transport analysis?

The questions appear to relate to modes of access to the existing school with no attempt to question how these may change to a new school located over 1km away across town centre.

1.3.2 Whilst there are no existing accident issues relating to pupils, pedestrians or cyclists, the provision of a new school will increase pedestrian flows within the local area, particularly during school drop-off and pick-up. The pedestrian and cycle access proposals are summarised below.

20mph proposal along Rhosnesni Lane;

20mph proposals along Westminster Drive;

Supporting traffic calming measures to both 20mph proposals;

School 'Keep Clear' markings along the site frontages;

New raised pedestrian crossing outside the school across Rhosnesni Lane;

New raised pedestrian crossing outside the school across Westminster Drive;

New footway proposal to the southwest corner of the Chester Road/ Westminster Drive/ Foster Road Junction;

New dropped kerb crossing of Chester Road (south of Westminster Drive);

*Additional footway widening on Chester Road/ Westminster Drive to 2.0m on the south eastern corner of the junction; and
New footway proposals linking Rhosnesni Lane to The Beeches and the residential areas to the north.*

Comment: There is a lack of clarity within the document to show precisely what is intended by these proposals. For instance, how is it intended to widen the footway on Chester Road junction with Westminster Drive when considering that there is a cycle lane delineated along the main carriageway?

Are these proposals actually achievable?

The introduction of traffic calming features are subject to the Traffic Calming Regulations with a requirement for a separate public consultation exercise. If the public consultation doesn't gain support how does the Council intend to deal with the issue? Detailed drawings should be submitted to allow for proper assessment.

1.3.3 The proposals are considered to be suitable to provide a Safe Route to School environment.

Comment: There does not appear to have been a Safe Routes to School study undertaken in accordance with WCBC guidance on Safe Routes to School. How can the public or the planning committee know if the proposed school is safe without evidence of a Safe Routes to School Study?

1.3.4 To encourage the use of sustainable travel modes, a Travel Plan would be adopted by the school. The Travel Plan forms a separate document within the planning application package.

Comment: There is no mention within the Transport Statement of Active Travel Wales. This is a fundamental requirement for any new development.

1.4.1 The residual 66% of pupils are forecast to travel by car. For those pupils, the hands up survey results in a forecast of cars at 55% of the number of children by that mode. The percentage of pupils by private car could be overstated as there are more pupils arriving by coach than stated in the survey and the private hire mini-buses and cars were not incorporated in the survey.

Comment: There is no evidence contained within this report that this survey has been undertaken. Where are the figures? What questions were the pupils asked? What age groups were asked?

1.4.2 Separate parking areas are proposed for coaches, staff and for pick-up and drop-off. The size of each area is proposed based upon the assessed needs of the school, following discussions with the existing school's management team.

Comment: The swept path shows coaches turning out of the site into the opposite carriageway which is unacceptable on a busy road that will become even busier due to school traffic.

It is suggested that there could be up to 7 busses on site during pick up times however there is no indication as to how these will be accommodated to ensure safe embarkation.

1.4.4 Regardless of the size of the on-site provision of drop-off/ pick-up spaces, it is likely that some parents would choose to drop-off/ pick-up on-street. To accommodate this, waiting time restrictions are proposed along Westminster Drive.

Comment: Waiting time restrictions require public consultation. If the public consultation doesn't gain support how does the Council intend to deal with the issue?

1.5.1 The car parking proposals for the school include revised parking restrictions on Westminster Drive

Comment: Waiting time restrictions require public consultation. If the public consultation doesn't gain support how does the Council intend to deal with the issue?

1.5.2 A car parking beat survey was undertaken on the 2nd March 2021. The parking beat survey shows that around 15% of local legal on-street car parking spaces were utilised during school pick-up and drop-off (a maximum of around 93 cars parked in 632 legal spaces). Whilst the survey was undertaken during travel restrictions, it suggests that there are suitable alternative locations for the relocated car parking to occur without detriment to nearby residents.

Comment: The transport consultants seem to consider that parking on the road is the accepted norm. Highway rights include the right to pass and repass but there is no defined right to park. To state that there are 632 local legal on street parking spaces is misleading; there is no defined parking. Parking on many of these roads would restrict road widths, restrict forward visibility for vehicles, restrict pedestrian movement, restrict the movement of refuse vehicles and potentially restrict movement of emergency vehicles.

The parking usage survey was undertaken on 2nd March 2021, a period when Covid restrictions were in place and many town centre workers either working from home or furloughed. The demand for on-street parking outside of the restricted town centre area was impacted by the temporary removal of parking charges from all Wrexham Council public

car parks; any town centre workers and shoppers have the ability to park for free. The numbers parking on the road are seriously skewed as car owners will choose to leave their vehicles for free in town closer to their place of employment. The parking survey is therefore rendered totally meaningless.

1.5.3 The details of the time-limiting would be agreed with the highway authority, however initially are suggested to be:

20 minute parking limit from 7am to 9:30am; and 20 minute parking limit from 2:30pm to 4pm.

Comment: The council's enforcement officers have limited ability to cover the busiest periods of the day, who is going to enforce these restrictions at 7am in the morning?

1.5.4 Traffic analysis has been undertaken for the access points to the site. The analysis forecast that the proposed access points to the site are suitable to accommodate the development-generated traffic.

Comment: The only capacity analysis is limited to that of the direct school access; there has been no analysis undertaken of the Chester Road/Westminster Drive junction with or the Park Avenue/Westminster Drive junction. Both junctions have visibility restriction; Chester Road junction appears to have visibility reliant on third party land and the Park Avenue junction has a visibility splay of just 12m in the critical direction. Any increase in traffic generation through a substandard access will add significant danger to all users of the highway. Due to the very tight radius of the junction and the position of a mature tree at the highway edge, traffic travelling along Park Avenue in a northerly direction and turning into Westminster Drive, has to enter the opposite side of the carriageway into oncoming traffic on Westminster Drive. Any increase in traffic generation through this substandard access will add significant danger to all users of the highway. The traffic consultants do not appear to have made any assessment of restrictions imposed by junction layouts and has completely ignored this very real and potentially dangerous issue.

1.6.1 The development proposals for a new primary school at Nine Acres has been considered in terms of transport accessibility by all appropriate modes of transport.

Comment: No details of Active Travel Wales have been submitted which is a glaring omission from a transport statement for a new school

1.6.2 A suite of measures have been proposed to provide Safe Routes to School and adequate on-site car parking and local parking restrictions to meet with the forecast

demand. Additional offsite works are proposed to Rhosnesni Lane, Westminster Drive and at the junction of Chester Road/ Westminster Drive to support the delivery of the school.

Comment: Safe Routes to School don't end 100m from the site - the walking catchment area needs to be fully studied in detail.

The following is an extract from the WCBC safe routes to school assessment:

SCHOOL TRANSPORT – HAZARDOUS ROUTES

The following is based on, and developed from, the Local Authority Road Safety Officers' Association [LARSOA] guidelines "Identification of hazards and the assessment of risk of walked routes to school." (April 2002 – www.larsoa.org) It is applied in assessing a non-hazardous walking route to school that is less than 3 miles (4,828m) for children under 16 years and 2 miles (3,219 metres) for children under 8 years.

1.6.3 There are considered to be no highway reasons for refusal of the planning application.

Comment: The study is desperately short on information about Active Travel, Safe Routes to School, Traffic impact analysis on Westminster Drive, Park Avenue and Rhosnesni Lane. Nowhere in the report are the visibility and junction issues at either end of Westminster Drive discussed.

There are highway reasons to refuse but the report hasn't addressed the issues.

2.2.1 At the time of writing this report the UK Government has enforced forms of lockdown/ travel restrictions due to the risk to public health of transmission of the Covid-19 disease. As such, travel patterns are highly unusual with traffic levels suppressed and some information on regular public transport routes not being available.

Comment: Authors of the report accept that traffic levels and travel patterns are highly unusual and therefore totally unreliable due to the pandemic however then consider it acceptable to present studies of car parking and traffic generation that bear no semblance to the normal traffic and parking conditions experienced pre pandemic. The school proposals were in the public domain at least 3 years ago so the Council had every opportunity to undertake survey work required to prepare a realistic transport assessment based on factual information. It is good practice to undertake transport studies under normal conditions not when traffic levels are unusually low.

2.2.3 The 'new normal' cannot be quantified at the current time and could include significant changes in travel patterns, including increased use of more sustainable

transport modes, increased flexibility in daily working patterns, including home working and travel time choices being made to reduce travel during peak times.

Comment: If the new normal cannot be quantified, why have the Council commissioned a report at a time when nobody really knows what the future holds? To suggest that the new normal could include increased use of more sustainable transport modes is complete guesswork and could just as well say there may be decreased use of sustainable transport modes. The transmission of virus on public transport is a real threat and could lead to a trend toward private car usage.

2.2.4 Best endeavours have been taken to provide accurate information within this report based upon historic and currently available information, where available. As the Government are taking all steps that they can to help to secure the economy, it is considered necessary that planning applications continue to be determined based upon the best information that is currently available to allow development and investment to continue.

Comment: It's difficult to agree that best endeavours have been taken when the council knew about this proposed scheme 3 years ago. They had ample time to get the data required instead of using current data which the report acknowledges is at a time when traffic levels are suppressed.

3. THE CHANGING FACE OF TRANSPORT

Comment: This section is totally irrelevant to the planning application and has clearly been lifted from previous traffic statements prepared for other sites

*4.2.3 Paragraph 3.12 goes on to state that:
Good design is about avoiding the creation of car-based developments. It contributes to minimising the need to travel and reliance on the car, whilst maximising opportunities for people to make sustainable and healthy travel choices for their daily journeys...*

Comment: If good design is about avoiding the creation of car-based developments, then why has this report concentrated so much on things like parking beat surveys and providing car parking provision well in excess of WCBC guidelines? The development proposals relate to a faith school which by nature draws pupils from a larger area than a standard state school; there will be a limited number of pupils living within walking distance; the proposal will generate increased levels of traffic. The majority of pupils will no doubt travel by vehicle thereby completely contradicting Planning Policy paragraph 3.12

*4.2.13 With Paragraph 4.1.51 stating:
design-led approach to the provision of car parking should be taken, which ensures an appropriate level of car parking is integrated in a way which does not dominate*

the development. Parking provision should be informed by the local context, including public transport accessibility, urban design principles and the objective of reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. Planning authorities must support schemes which keep parking levels down, especially off-street parking, when well designed. The needs of disabled people must be recognised and adequate parking provided for them.

Comment: There is a requirement for an appropriate level of car parking to be integrated in a way which does not dominate the development. There appears to be a distinct lack of consideration of Active Travel legislation in the choice of this site resulting in the car parking provision for this scheme to dominate the proposals?

4.3.9 Policy SP12 sets out the requirements for transport and accessibility as follows:

Wrexham's transport network will be developed in a safe, efficient and sustainable manner through the following measures:

i. Restricting development that would have an unacceptable impact on the safe and efficient operation of the transport network

vii. Develop the coverage of the Active Travel Network across Wrexham to promote increased use of walking and cycling as safe, viable and sustainable alternatives to the car,

Comment: The transport study avoids looking at problematic issues like visibility at junctions. Increasing traffic levels through poor junctions would doubtless have an unacceptable impact on the safe and efficient operation of the transport network. Poor visibility at junctions or indeed at single dwellings is a standard highway reason for refusal of planning applications.

No account has been taken of Active Travel Wales.

4.5.2 Technical Advice Note 18:Transport sets out further details on the requirements for transport relating to development. Technical Advice Note 18 sets out that:

All new schools should be subject to TA. The level of analysis should provide the decision maker with suitable data regarding the accessibility of the site by all modes and the impacts on movement patterns likely to occur. The level of detail should be proportionate to the scale of the development. The objectives of the TIS should as a minimum include the creation or improvement of safe cycling and walking routes, restricting car access around schools, providing adequate cycle storage, and a framework for future school travel planning activity.

Comment: The provision of car parking for 76 parental cars, 7 buses and 40 staff conflicts with the policy of restricting car access around schools?

Travel Plans are very useful in when correctly implemented and managed however how in practice, how does WCBC manage without a designated travel plan officer to monitor the plans.

5.2.1 Discussions with the management at St Mary's RC School show that there are around 71 sets of siblings at the existing school. When equated to the 315 primary school age pupils, this equates to around 100 sole pupil attendees and 165 pupils with one or more siblings.

Comment: There has been an attempt to assess the potential for shared travel by considering the number of pupils with siblings within the school although no explanation of the resulting numbers (165 pupils with 1 or more siblings and 100 sole pupils) which appear meaningless.

*5.2.6 For pupils from the wider area, there are currently:
Six full-size coaches;
One midi-coach;
Two to three mini-buses; and
Two to three private-hire vehicles.*

Comment: The school is served by a mix of full-size coaches, midi coach, mini buses and private hire vehicles which presumably also serve other schools in the area; how will the change of location of the school affect their trips? These vehicles will arrive/depart at various times; how will the safety of pupils be managed/assured through the drop off/pick up procedure with uncontrolled movement of vehicles within the proposed MUGA?

A study showing where the existing buses pick up from and the numbers they pick up would help inform the new school proposals. It would also help understand which direction each bus will travel from towards the new school. These considerations are vital to allow an adequate assessment of proposed movements and preferred access and egress routes.

5.2.7 It is understood that around 38 pupils travel to the school utilising the coaches. The coaches are understood to depart at 3:25pm. There appears to be potential for the coach services accessing the school to be rationalised in the future, thereby reducing the number of these vehicle types.

Comment: The current services have operated for years and their need and effectiveness have no doubt been previously reviewed; it would be surprising to identify any significant rationalization at this stage.

5.3.1 A hands up survey has been undertaken at the existing school. The hands up survey provides the existing mode share of pupils, as follows:

*Total respondents – 355 pupils;
By car – 236 pupils – 66%;
Walking – 85 pupils – 24%;
Bus – 28 pupils – 8%;
and Cycling – 6 pupils – 2%.*

Comment: The hands up pupil survey returned 355 respondents but para 5.2.1 suggests that there are only 315 primary aged pupils in the school; were the nursery school pupils included in the hands up survey and if so, what reliance can be attributed to any of these responses?

It was stated in para 5.2.7 that 38 pupils travel by bus however it is now suggested that the figure is 28 – which is correct?

It is suggested that 24% of pupils walk to the existing school site but for how many of these will walking remain a practical option. How many of that 24 % will change to either car or bus to access the new school.

It is standard practice for a transport study of this nature to include an analysis/consideration of trip origins based upon pupil's residential postcodes. It is not appropriate to simply assume that more houses around the new school will result in an increase in the number of pupils willing or able to walk to school.

There are 6 existing schools within 1 mile of Nine Acres to what extent is the new school intended to attract from the immediate vicinity rather than accommodate existing pupils; a study of existing and future usage patterns is deemed essential.

5.3.2 The existing mode share is considered to be robust in terms of access by car as the number of pupils responding that they access by bus /coach is below the number provided by the school

Comment: This statement acknowledges that the survey results are incorrect and brings into question the validity of a “show of hands” when dealing with primary aged pupils. What decision can a planning committee be expected to make when the transport statement acknowledges that survey results are incorrect?

5.3.3 Based upon the number of pupils attending by coach, the mode share by bus could be around 11%, rather than the 8% discussed above. Consequently, the mode share by car could be overstated.

Comment: There is no evidence to support this claim; it appears to be made up in an attempt to reduce the likely traffic impact on the local highway network.

5.3.4 In addition, there are two to three mini buses and two to three private hire vehicles which are utilised by pupils. These were not separately noted in the survey and could reduce the proportion of pupils dropped off by parents.

Comment: What questions were asked in the survey and how did these questions fail to identify any pupils who use the mini buses and private hire vehicles.

5.3.5 *With regard to pedestrian access, Figure 5.1 in Appendix A shows the walk in catchments to the existing and proposed school site. It can be seen from Figure 5.1 that the proposed Nine Acres school is more centrally located with a high residential density within both the 800m and 1,600m (10 and 20-minute walk) isochrones.*

Comment: Whilst the isochrones show that the proposed school site is more centrally located within an area of higher residential density, this makes no reference to the distribution of current pupils. Neither does it make reference to the availability of other schools in the area; there would appear to be a higher density of schools in the area to the north of the town centre to match the higher population density.

To what degree do parents/guardians make linked/shared trips between pupils at St Mary's and St Joseph's High School? What impact does this have on the assumed reduction in vehicular trips?

5.3.6 *Consequently, it would be reasonable to conclude that there is potential for the percentage of pupils walking to school to increase, once relocated.*

Comment: This is a very bland assumption without any consideration of the residential distribution existing/future pupils. There are significant numbers of terraced houses close to the existing school leading to increased population density as opposed to the more spacious residential areas around the proposed site.

A study of the residential distribution of existing/future school pupils is considered essential in order to make any assessment of future travel behavior.

5.3.7 *The hands up survey also collated the number of pupils who travel by car with other pupils (including siblings), as follows:*

Total respondents – 189 pupils;

Single child in car – 40 pupils; Two children in car – 88 pupils; and

Three or more children in car – 61 pupils.

Comment: It was suggested in para 5.3.1. that the survey identified 236 pupils travelling by car; how is this now reduced to 189?

5.3.8 *For those that travel by car, the hands up survey results in a forecast of cars at 55% of the number of children by that mode.*

Comment: It was stated in para 5.3.1 that this figure was 66% - which figure should we assume to be correct?

5.3.12 *For the school pick-up, the number of pupils leaving at school closing reduces by around 54 (16% of pupils) for two to three days per week, with 249 leaving at the typical school closing time on these days.*

Comment: The report fails to consider the mode of transport used by the pupils who use after school facilities and to what extent this affects those walking or travelling by car/bus. All assumptions appear to be made in favour of reducing the likely impacts on the highway network

5.4.1 *There are currently around 40 staff employed at the school, of whom 33 staff are understood to be full-time.*

Comment: It would appear that there has been no attempt to survey the travel patterns of existing staff.

5.5 SUMMARY

The report fails to include details of questions posed to pupils in the show of hands and only provides a summary of results rather than a clear tabulated result of the findings. The report acknowledges that there are discrepancies and misinformation but makes no attempt to correct these. The discrepancies result in surveys that cannot be relied upon to provide an adequate assessment for future traffic generation at the proposed school. There has been a lack of appropriate studies required to determine existing travel patterns resulting in questionable assumptions and results.

6. ACCESS PROPOSALS

6.1 INTRODUCTION

6.1.1 *This chapter discusses the site layout of the development proposals in terms of access for all appropriate modes of transport.*

Comment: There has been no attempt to consider the wider implications of walking and cycling to the proposed school site with the only improvements being limited to the periphery of the site. Despite the local increase in pupil numbers and the generation of additional traffic in the area, there has been no consideration of the provision of a controlled crossing of Chester Road

6.2.1 *Two main pedestrian access points are proposed for the school, the first is via Rhosnesni Lane (to the north) and the second via Westminster Drive (to the south).*

Comment: Providing pedestrian access on to Westminster Drive will generate more traffic on to the road; a road where there are existing parking issues and substandard junction arrangements. These existing concerns have not been identified or considered within the transport statement.

6.2.7 It is proposed to reduce the speed limit along the school frontage to 20mph, in line with best practice. This would incorporate both 20mph signage and a suite of traffic calming measures between Chester Road and the north-eastern corner of the school site.

Comment: This suggests the introduction of a suite of a traffic regulation order and traffic calming measures both of which are covered by highway legislation and will be subject to a separate public consultation exercise; the delivery of a scheme cannot be guaranteed and cannot be relied upon.

Rhosnesni Lane is relatively heavily trafficked during peak hours; the introduction of several sets of traffic calming features has the potential to induce increased speeds between each set of features with potential implications for the safety of school children. The lack of detailed consideration or any scheme proposals shows a distinct lack of detail.

6.2.13 When approaching the site from the southwest, there are existing narrow footways around the junction of Chester Road/ Westminster Drive/ Foster Road. The proposals incorporate a new widening of the southwestern corner of this junction to provide a suitable waiting point for pupils waiting to cross Chester Road.

Comment: Detailed plans should be published to indicate the nature/extent of improvements and deliverability given current demands for road space.

6.2.14 Minor footway widening around the south-eastern corner of the Chester Road/ Westminster Drive/ Foster Road junction is also proposed so that a minimum 2.0m footway is available to pedestrians.

Comment: Detailed plans should be published to prove that these improvements are deliverable given restrictions imposed by the existing on-road cycle lane.

6.2.16 The pedestrian access proposals are considered to provide a suitable environment for access to, and within, the school.

Comment: Safe Routes to School does not just apply in the immediate vicinity of the site. The study should take in a wider area to look at the walking isochrones identified within the report.

6.4 ACCESS BY COACH

6.4.1 *As discussed in Chapter 5, there are currently six full-size and one midi-size coach which serve the school. There is potential for the number of coaches to be rationalised over time to accommodate the 38 pupils who currently utilise these services.*

Comment: The school is served by a mix of full-size coaches, midi coach, mini buses and private hire vehicles which presumably also serve other schools in the area; how will the change of location of the school affect their trips? These vehicles will arrive/depart at various times; how will the safety of pupils be managed/assured through the drop off/pick up procedure with uncontrolled movement of vehicles within the proposed MUGA?

6.4.4 *There are two access/ egress points provided to the coach waiting area. The first is a coach-only access/ egress point to the northeast of the MUGA. Only coaches would utilise this access/ egress.*

Comment: It is unclear from the plans which access is to be used for entry and which for exit; the optimal use may depend on existing routes and the direction of approach of the buses/coaches however this does not appear to have been considered.

Coaches leaving the site appear to cross the centre line of the carriageway into the opposite lane and therefore oncoming traffic suggesting that the access layout is inappropriate.

6.4.6 *It is intended that coaches would operate in either a clockwise or anti-clockwise direction, both entering and exiting in a forward gear. There should be no requirement for the reversing of coaches within the school grounds.*

Comment: This suggests that there will be no reversing of coaches on the site how will this be managed? Will drop off/pick-up be restricted to the periphery of the MUGA will bays be identified and raised boarding kerbs provided? What layout/arrangement has been discussed with the Road Safety Officer?

6.9 STAFF CAR PARKING PROVISION

Comment: Staff parking provision matches the number of current staff even though some of these are part time. With the provision of an excess number of parking spaces, how are staff to be encouraged to use sustainable travel modes?

6.9.9 *The link between the northern and southern car parking areas would allow the car parks to act as one car park or two discrete car parking areas. Circulation could be north/south, south/ north or via the separate access points onto Rhosnesni Lane and Westminster Drive.*

Comment: The directional operation of the drop off and pick up has not been decided; this has significant implications on the routing of traffic and the impact of traffic levels on surrounding roads.

It is not possible to accurately assess the highway impact on the local highway network if the decision on the routing of traffic has not yet been decided. The application is clearly premature and has not been given adequate consideration.

6.9.14 The provision of 78 car parking spaces for parents is considered to be suitable for the location, whilst acknowledging that some parents would wish to drop-off and pick-up on the street.

Comment: The number of parking spaces proposed is significantly more than WCBC LPGN 16 guidelines and goes against Welsh Government advice on reducing vehicular usage.

6.9.15 Based upon the assessment in Chapter 5, the peak demand of parents could equate to around 112 cars relating to pupils. However, this does not appear to account for the pupils arriving by mini-bus and by private hire. As such, the actual number of pupil-related cars could be lower than this, at around 100.

Comment: Due to inaccuracies of the show of hands survey and lack of any attempt to assess modal choice of parents delivering pupils to the new school site, there is no opportunity to quantify the demand for the drop off pick up area or to assess the adequacy of provision.

There has been no attempt to assess the arrival time of parents or the duration of stay at pick up time; any extended stopover has implication for the turn around and reuse of spaces.

When the report suggests that the figure ‘maybe lower than this, at around 100’ it could also be significantly higher than this and is indeed likely to be. Without an adequate study of existing pupil distribution, the figures put forward in this report are meaningless.

6.9.18 For days with an afterschool sports club, the peak pick-up demand could be around 90 pupil-related cars. For other days the peak demand could be around 112 pupil-related cars. Both of these are before the mini-bus and private hire vehicles are accounted for; therefore, these could be an overestimate (as discussed in Paragraph 6.9.15 above).

Comment: These figures appear unrealistically low. With 360 pupils in the school and there are according to the report 66% who travel by car with 55% of those allegedly having siblings then there are potentially 131 vehicles (this depends upon 24 % of pupils continuing to walk to the proposed site).

Traffic generated using those figures alone amount to a significant increase in local traffic numbers; 262 parental trips, 40 staff trips and 44 bus /taxi trips. That equates to 346 additional vehicular trips which will no doubt be concentrated closer to a half hour period rather than distributed evenly throughout the hour assumed. Given that some junctions suffer from severely substandard visibility, this level of additional traffic will potentially lead to significant issues related to the free flow of traffic and also add significant danger to all users of the highway

6.9.19 Consequently, there is forecast to be a residual demand for on-street car parking as a result of the development proposals. It is expected that this demand would occur regardless of the size of the drop-off/ pick-up car park as some parents will not wish to enter the school grounds, preferring to drop-off/ pick-up on street. This provision is proposed on Westminster Drive and is discussed further in Chapter 7

Comment: The demand of on street parking is already evident without the proposed school. There have been on-going parking issues along Westminster Drive for a number of years (20 years plus) with complaints/enquiries well documented within the WCBC highway department. There is documented evidence that senior highway staff raised concerns about Westminster Drive less than 4 years ago when Wrexham FC were proposing to use the site for training.

7. WESTMINSTER DRIVE

Comment: The survey of existing parking demand was undertaken during a period of covid restrictions when a significant proportion of town centre commuters were working from home and town centre shops not fully open. In addition, due to covid restrictions, parking charges on town centre car parks were dropped resulting in significant parking demand on Westminster Drive and the surrounding area. Any loss of on-street parking in the area is likely to have a direct impact on the amenity of neighbouring properties.

The report has failed to consider visibility and junction radius restrictions to the detriment of highway safety and operations.

7.2.3 A car parking beat survey was undertaken on the 2nd March 2021 which showed that the on-street parking spaces increased from 7 at 08:00 to 15 at 09:00. This survey also showed that 18 cars were parked at 15:30, reducing to 14 by 16:00.

Comment: Car parking in WCBC town centre car parks is currently free. This clearly has a knock-on effect on the parking demand at Westminster Drive. WCBC highways department have had long standing and well documented issues along Westminster Drive. There is questionable

benefit of any on-street parking survey undertaken during the current period of restrictions.

7.3.1 In order to free-up spaces at school drop-off and pick-up, time-limited parking is proposed along the northern side of Westminster Drive. The details of the time-limiting would be agreed with the highway authority, however initially are suggested to be:

20 minute parking limit from 7am to 9:30am; and 20 minute parking limit from 2:30pm to 4pm.

7.3.2 In addition, a 2 hour limit could be imposed during the day (Monday to Friday) to align with the existing time limits on the southern side of Westminster Drive.

Comment: Any amendments to parking restrictions require public consultation; there is no certainty that these proposals can be delivered.

7.4.1 With the proposed on-street provision to supplement the on-site car parking, the school pick-up and drop-off times are considered to be catered for.

7.4.2 It is acknowledged that these proposals would result in a number of drivers who currently park on street on Westminster Drive being relocated elsewhere. As such, the parking study extended to cover Westminster Drive, Maesydre Road and areas to the north of the school including Cilcen Grove and The Oaks.

Comment: The report is acknowledges that if the school proposal is given the go ahead, additional residential areas will be affected by daily commuter on street parking. The detrimentally impact to residential amenity and the additional problems to the free flow of traffic in the vicinity should be a key consideration of these proposals.

8. TRAVEL PLAN

Road Safety Training – engage with council Road Safety Officers to undertake annual Kerb Craft Campaign training at the school;

Active Travel – engage with Health Promotion Service and Sports Officers to provide information and training on health issues and physical exercise; Active Travel – Promote the Wrexham active travel map

<https://www.sustrans.org.uk/media/3004/wrexham-web-2014.pdf>;

Comment: WCBC do not have a designated officer responsible for the assessment or management of travel plans; this function has been missing since the withdrawal of Welsh government funding over five years ago. There is reference within the travel plan to Active Travel but there is no acknowledgement of the Active Travel Regulations within the transport statement.

9. SAFE ROUTES TO SCHOOL REVIEW

Comment: The Safe Routes to School Review has failed to identify or assess the adequacy of any pedestrian or cycle route that will potentially be used by pupils accessing the school. A simple review of historical traffic accident data provides no indication of the future risks resulting from the introduction of a new school in the area and the consequential increase in the number of pedestrian/cyclist pupil numbers and vehicular movements. The Council has a set policy for agreeing safe routes to school which requires the assessment of traffic speeds, vehicle numbers, pedestrian/cycle demand and adequacy of the provision of pedestrian/cycle facilities.

10. HIGHWAY ASSESSMENT

10.1 INTRODUCTION

10.1.1 Due to the Covid pandemic it is not possible to obtain traffic flow data for 'normal' operating conditions.

Comment: If the conditions on traffic flow and on street parking are not normal then clearly the planning application is premature and should be delayed until such time as an appropriate assessment can be completed.

The highway assessment is limited to a capacity assessment of a school access onto Rhosnesni Lane; there has been no attempt to consider the impact on the operation of the Rhosnesni Lane/Chester Road roundabout or Westminster Drive/Chester Road junction. Neither has there been any assessment of the suitability of nearby junctions to safely accommodate additional traffic movements; the available visibility at the junction of Westminster Road with Park Avenue is severely restricted by the avenue of trees.

10.1.2 Even so, to inform this Transport Statement traffic counts have been undertaken on Rhosnesni Lane and Westminster Drive. The traffic counts were undertaken on the 2nd March 2021. This chapter discusses the highway assessment of the development proposals.

Comment: The report has acknowledged that conditions and travel patterns are not normal and are affected by covid restrictions; many schools have whole classes isolating and many people are working from home and have not yet returned to the workplace. All survey figures are likely to be well below normal levels resulting in meaningless survey results.

10.2.2 The nearest Department for Transport traffic count location to the site is located around 500m north of this junction close to Box Lane. The annual average daily traffic flows in that location for 2020 are estimated as 10,796 two-way vehicle movements.

Comment: Due to the pandemic and covid restrictions the 2020 figures were only estimated and relate only to AADT it takes a further assumption to relate to peak hour assessment flows. Each estimate/assumption leads to a loss of reliability in any assessment.

10.3.7 In reality, there are a number of routing options within the car park, with either a north/ south one-way, south/ north one-way or two separate car parks with two-way access. Any of these options would materially reduce the forecast traffic impact at either access, as such, the robust scenario is considered suitable for determining the appropriateness of the access points to the site.

Comment: Clarification is required regarding the intended direction of access and egress; consequential traffic flows could have a significant impact on the operation on highway operations.

10.4.2 The traffic count data is attached at Appendix B, the DfT count data at Appendix C and the detailed analysis attached at Appendix D.

Comment: Traffic count data was from 2020 when the pandemic suppressed traffic generation figures to levels which are clearly not representative of normal conditions.

10.5.3 Whilst a number of assumptions have been made, the analysis is considered to be robust and the traffic modelling forecasts that the access points to the site are suitable to accommodate the development-generated traffic.

Comment: The transport study acknowledges that the traffic figures are based on assumptions and surveys undertaken during periods during abnormal conditions; the figures produced are not representative of normal conditions and therefore little reliance can be placed on the traffic forecasts.

TRAVEL PLAN

Comment: Little or no thought has been given to the specific issues related to the relocation of St Mary's School; paras 1.3.1 and 3.3.1 make reference to a school extension and extended school, clearly identifying this as an "off the shelf report" that has been cut and paste to serve a need.

3.3 Staff Target

Comment: There is no evidence of any attempt to undertake a survey of staff travel modes however provision of 1:1 staff: parking space ratio has been proposed. If the baseline rate of sustainable staff travel is 0% the 5% increase after one year and 10% increase after three years is still 0%.

4.2 Measures during construction

Comment: This section again reiterates the lack of attention to the specific needs of the proposal; what benefits are to be achieved during the construction period by the introduction of measures around the school site when pupils and staff are located on the existing school site on the opposite side of town?

4.3 Measures during operation

Comment: Car sharing (staff) what is the benefit of providing specific staff car sharing spaces when staff parking provision is at 100%?

The Wrexham Active Travel Map located on the sustrans web site is promoted through an inoperable hyper link.

CAR PARK MANAGEMENT PLAN

Comment: The car park management plan provides no information related to the specific operation of the car park with para 2.7.10 suggesting that circulation within the drop off/pick up area could be north/south or south/north and 3.3.1 suggesting that the coach area could operate in a clockwise or anti-clockwise direction. These specific details are required in order to design the bus embarkation/embarkation points and assess the impact of traffic movements on adjacent streets.

Utilising the swept path analyses included within the appendices of the Transport Statement, any anticlockwise movement of buses would leave pupils disembarking in the centre of the bus maneuvering area.

There would appear to be inadequate space around the periphery of the MUGA to accommodate all six buses.

There does not appear to have been any assessment of the suitability of the neighbouring highway network to accommodate bus movements; where will the buses be coming from/going to and what routes would they use? What limitations are there in regard to junction geometry and on-street parking?