



Proposed School Development Nine Acre Playing Field, Westminster Drive, Wrexham

**RESPONSE TO PRE-APPLICATION CONSULTATION
ON BEHALF OF THE NINE ACRE COMMUNITY
GROUP**

August 2020



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Appendix A – Nine Acre Community Group Masterplan for Nine Acre Playing Field

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/1 INTRODUCTION

- 1.1. PWA Planning is retained by Nine Acre Community Group to submit representations in response to the pre-application consultation undertaken by Wrexham Council ('the applicant') in relation to proposals to build a new primary school on Nine Acre Playing Field, Westminster Drive, Wrexham.
- 1.2. This report provides details in relation to the description of the site and the proposed development. A review of the planning policy of relevance to the site is provided, along with an assessment demonstrating that the proposals are contrary to both national and local planning policy.
- 1.3. The remainder of this report is structured as follows:
 - Section 2 – Site Description and the Proposal
 - Section 3 – Planning Policy Context
 - Section 4 – Planning Policy Assessment
 - Section 5 - Conclusions

/2 SITE DESCRIPTION AND THE PROPOSAL

Site Description

- 2.1. Nine Acre Playing Field is an area of open space which is currently used as Wrexham Football Club's training ground. The site is bound by Westminster Drive to the south, Chester Road (A5125) to the west, Rhosnesni Lane to the north and residential development to the east. An amateur boxing club is located along the southern boundary of the site, which does not form part of the application site and will be retained. The site is located to the north of Wrexham town centre within an area of dense urban development.
- 2.2. An aerial image of the site within its setting is provided at Figure 1 below.

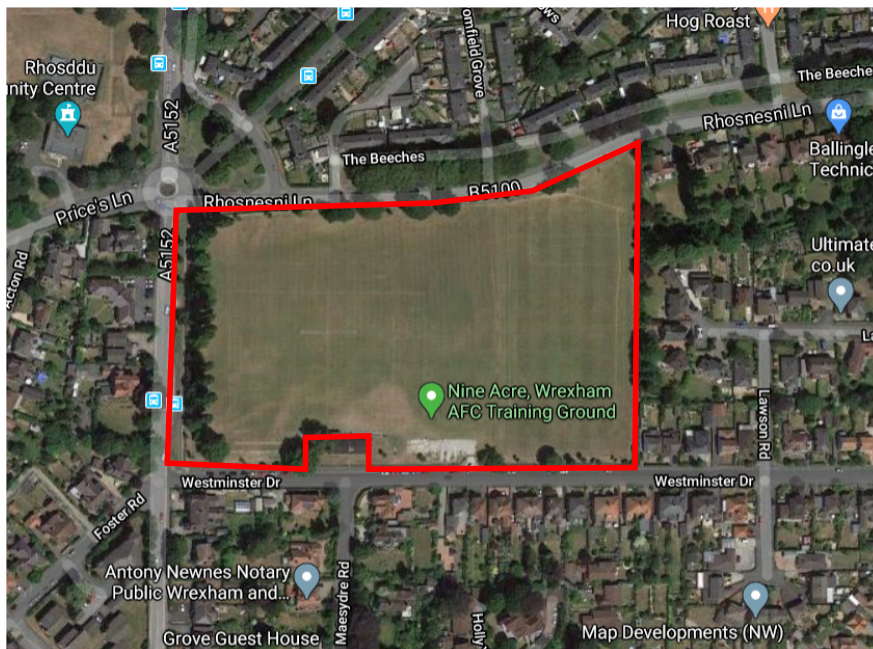


Figure 1: Aerial image showing the location of the site (not to scale)

Proposed Development

2.3. As part of the pre-application consultation undertaken by Wrexham Council, the following plans and documents have been made available to the public to set out the proposals for a new primary school on the Nine Acre Playing Field Site:

- Indicative Site Plan;
- 3D Views and Street Views;
- Indicative Elevations;
- Design and Access Statement; and
- Planning Forms.

2.4. The consultation portal advises that Wrexham Council wishes to seek the views of interested parties regarding the proposals, and that it is important that stakeholder views can be taken into account before a planning application is made.

2.5. The consultation material sets out that an outline planning application is to be made for the erection of a new school, associated bus bay on Chester Road, turning and drop off areas, car parking, playground, sports pitches, forest school area and new woodland Public Open Space.

Alternative Proposal

2.6. It is important to note that the Nine Acre Community Group have developed alternative plans for the site to ensure that it is retained as an area of open space. They are keen for this area of land to be open for public use as a playing field, play area, woodland and pond. A plan showing the potential layout of the site to be retained as public open space, providing an important community resource, is included at Appendix A. The Nine Acre Community Group could support the management of the site if it were to be retained for this purpose.

/3 PLANNING POLICY CONTEXT

- 3.1. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that:

"Where in making any determination under the Planning Acts, regard is to be had to the Development Plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise."

- 3.2. The Development Plan for the Nine Acre site comprises of the Wrexham UDP 1996-2011 (adopted 2005). Key policy documents that comprise 'material considerations' include Planning Policy Wales (Edition 10) and TAN 16: Sport, Recreation and Open Space, and any local supplementary planning guidance documents considered relevant to the proposal.
- 3.3. The Council are currently in the process of preparing a new Wrexham Local Development Plan which will replace the UDP once adopted. The LDP is at an advanced stage given it has been submitted to the Planning Inspectorate and initial examination hearings have taken place. Therefore, we consider the Deposit LDP will also be a material consideration in the determination of the planning application.

Wrexham UDP

- 3.4. The Wrexham UDP seeks to provide a framework for local decision making and the reconciliation of development and conservation interests in order that land use changes proceed coherently and with maximum community benefit.
- 3.5. **Strategic Policy PS2** of the Wrexham UDP requires that development must not materially detrimentally affect countryside, landscape/townscape character, open space, or the quality of the natural environment.

3.6. **Strategic Policy PS3** states that development should use previously developed brownfield land comprising vacant, derelict or underused land in preference to the use of greenfield land, wherever possible, particularly so where greenfield land is of ecological, landscape or amenity value, or comprises agricultural land of grades 1, 2 or 3a.

3.7. **Wrexham UDP Policy CLF4 (Playing Fields, Children's Play Areas, and Open Space)** clearly states that:

'The redevelopment of sports grounds, playing fields, children's play areas and informal open spaces and allotment gardens for uses other than sport and recreation will not be permitted unless:

- a) Redevelopment of only a small part of the site would allow the retention and enhancement of that existing facility; or*
- b) The long-term requirement for the facility has ceased and it would not lead to, or increase an existing shortfall of that facility in the immediate locality; or*
- c) The loss can be replaced with an equivalent or greater provision in the immediate locality. Alternative sites should be within settlement limits or, in exceptional circumstances, adjacent to settlement limits provided that associated buildings, lighting, and parking facilities are not intrusive in the landscape and user accessibility is not reduced.'*

3.8. The supporting text to this policy advises that a significant emphasis will be placed on the protection of existing playing fields, which will be safeguarded from development and retained for recreational use. The supporting text goes on to advise that increasing importance is placed on the contribution to the character of the local landscape and townscape and residents' quality of life made by open space through both its active recreational use and visual contribution.

Wrexham Local Development Plan 2013-2018 Deposit Plan

- 3.9. Once adopted, the Wrexham LDP will replace the current UDP and will be used as a basis for making land use planning decisions up until 2028. The initial hearings for the examination of the LDP commenced in September 2019. Subsequent to these hearings, the Inspectors recommended the suspension of the examination in order to provide time for the Council to answer questions on key topics. Further hearing sessions took place in February and March 2020, however, the examination was subsequently suspended up to the end of August 2020 to allow the Council time for further work to be undertaken. Notwithstanding this, given the advanced stage that the LDP has reached, we consider the policies of the LDP to carry weight in highlighting the Council's future policy intentions.
- 3.10. **Emerging Objective SO6** of the Deposit LDP seeks to promote and encourage a healthy, active and safe lifestyle. It is stated that this can be achieved, amongst other means, by providing high quality green infrastructure including open space.
- 3.11. **Emerging Policy CF1 (Protection of Existing Open Space, Sport and Recreational Facilities)** of the Deposit LDP seeks to protect, manage and enhance the existing network of diverse, multi-functional open spaces, sport and recreation facilities. The policy states that development will only be permitted on areas of open space, sport and recreation facilities where:
- i. It would not cause or exacerbate a deficiency of open space in accordance with the most recent open space study; and
 - ii. The open space has no significant functional or amenity value and there is no prospect of improvement; and
 - iii. The open space is of no significant quality; and
 - iv. Alternative open space and/or sport and recreation provision of equivalent or greater community benefit is made available in a suitable location.

- 3.12. The supporting text to this policy states that for the purposes of the Plan, open space is defined in accordance with guidance contained in TAN 16. It includes all open space of public value which offer important opportunities for play, sport, recreation and tourism, and can also be important for visual amenity, and may have conservation and biodiversity functions. The policy is clear that where an area of open space has not been identified in the Open Space Audit and Assessment of Need 2016, the criteria set out in Policy CF1 will still apply.

TAN 16: Sport, Recreation and Open Space

- 3.13. Welsh Government TAN 16 clearly sets out at paragraph 3.12 that open space, particularly that with a significant amenity, nature conservation or recreational value should be protected. It states that local planning authorities should establish criteria against which sites should be assessed if development pressures arise.
- 3.14. TAN16 sets out a definition of open space at Annex A as follows:

'Open space is defined in the Town and Country Planning Act 1990 as land laid out as a public garden, or used for the purposes of public recreation, or land which is a disused burial ground. For the purposes of this guidance, open space should be regarded as all open space of public value, including not just land, but also areas of water such as rivers, canals, lakes and reservoirs which offer important opportunities for sport, recreation and tourism, and can also act as a visual amenity, and may have conservation and biodiversity importance.'

'Areas which are privately owned may have amenity value, although access will not be possible without the agreement of the land owner. Areas like domestic gardens are relevant, since places without or with few gardens, are likely to be more reliant upon the provision of public spaces.'

- 3.15. Paragraph 3.5 of TAN16 states that outdoor facilities like playing fields can provide significant health, and environmental benefits for the community. Paragraph 3.7 goes

on to state that playing fields have special significance for their recreational and amenity value and particularly in towns and cities, for their contribution to the urban environment and for supporting biodiversity. It is advised that playing fields add interest and vitality to living and working environments.

- 3.16. Paragraph 3.7 states that when playing fields are not required for their original purpose, they may be used to help meet the need for informal recreational or amenity land in the wider community. Only where it can be clearly shown that there is no deficiency, should the possibility of their use for alternative development be considered. The policy states that playing field loss will need to be justified in relation to policies in the LDP, PPW and, where available, be consistent with the findings of the Open Space Assessment.

Planning Policy Wales Edition 10

- 3.17. PPW sets out the importance of recreational spaces at section 4.5. The document states that recreational spaces are vital for our health, well-being, amenity and can contribute to an area's green infrastructure. They provide a place for play, sport, healthy physical activity and a place to relax often in the presence of nature, and they contribute to our quality of life. It states that networks of high quality, accessible green spaces and recreation spaces will also promote nature conservation, biodiversity and provide enjoyable opportunities for residents and visitors to participate in a wide range of physical activities. These activities are important for the well-being of children and adults and for the social, environmental, cultural and economic life of Wales.
- 3.18. Paragraph 4.5.3 states that formal and informal open green spaces should be protected from development, particularly in urban areas where they fulfil multiple purposes. As well as enhancing quality of life, they contribute to biodiversity, nature and landscape, better air quality, the protection of groundwater and as places of tranquillity. Such open spaces also have a role in climate protection and in enabling the adaptation of urban areas to the impacts of climate change, for example by contributing to flood management and helping to reduce the effects of urban heat islands.

3.19. Specifically in relation to playing fields, paragraph 4.5.4 of PPW states that:

'All playing fields whether owned by public, private or voluntary organisations, should be protected from development except where:

- Facilities can best be retained and enhanced through the redevelopment of a small part of the site;*
- Alternative provision of equivalent community benefit is made available locally, avoiding any temporary loss of provision; or*
- There is an excess of such provision in the area.'*

3.20. PPW requires planning authorities to protect playing fields and open spaces, which have significant amenity or recreational value to local communities, from development. It is advised that they should encourage the multiple use of open space and facilities, where appropriate, to increase their effective use.

Wrexham Open Space Audit and Assessment of Need Report (Knight, Kavanagh and Page, March 2016)

3.21. The Open Space Assessment provides detail with regard to open space provision in Wrexham County Borough, its condition, distribution and overall quality. The assessment sets out that open space is of paramount importance in Wrexham and advises that there is a wide variety of benefits arising from the effective provision of open space.

3.22. The study found that in Maesydre, the ward in which Nine Acre Playing Field is located, there is a deficit in amenity greenspace (-1.71ha) and provision for children and young people (-0.11ha) when assessed against the Wrexham County Borough standard based on ward population.

3.23. The open space assessment omits areas of open space which are not accessible or freely available to use by the public. For this reason, Nine Acre Playing Field is not included in the assessment. However, the assessment clearly states that it is important

to recognise that PPW states all playing fields should be protected from development regardless of ownership. In addition, as we have set out above, Emerging Policy CF1 of the Wrexham LDP states that where an area of open space has not been identified in the Open Space Audit and Assessment of Need 2016, the criteria set out in Policy CF1 will still apply. It is also important to remember that there is the option for the site to become available for public use if the plans developed for the site by the Nine Acre Community Group were to be progressed.

Guidance for Outdoor Sport and Play: Beyond the Six Acres Standard Wales (Fields in Trust)

- 3.24. The publication seeks to provide guidance for practitioners on open space provision and design. PPW states that the guidance is a source of helpful advice to planning authorities. The Fields in Trust policy framework seeks the protection, provision and improvement of outdoor spaces for sport and play as part of the provision of sustainable communities. Fields in Trust objects to the loss of existing open space for sport, play and recreation unless exceptional circumstances can be demonstrated. It is set out that proposals for the development of community playing fields should be refused unless replacement facilities of equal quality and quantity can be provided to serve the same catchment area to meet the need of both new and existing communities.

/4 PLANNING POLICY ASSESSMENT

Policy Presumption Against the Loss of Open Space

- 4.1 It is clear from the planning policy review set out at Section 3 that there is a national and local policy presumption against the loss of open space.
- 4.2 We note that it is the applicant's view that the Nine Acre Playing Field site does not comprise public open space as the site is not currently accessible to the general public with the sports pitches leased out to Wrexham Football Club for private use. We strongly refute the applicant's view in this regard and consider the site represents an area of important open space, which meets the definition of open space set out in TAN16. Although the land is currently used as private sports pitches, the open space is of public value, as it provides visual amenity, amenity value by providing an area of greenspace within the urban environment, a contribution to biodiversity, habitats, air quality and flood risk mitigation, amongst other benefits. PPW is also clear that all playing fields, whether owned by public, private or voluntary organisations, should be protected from development.
- 4.3 In addition, although the site is currently leased out to Wrexham Football Club, we are not aware of any reason that the site could not be made available for public use. As we have set out in Section 2, the Nine Acre Community Group have devised a masterplan for the site which would allow it to be retained for public open space.
- 4.4 On the basis that Nine Acre Playing Field provides an important area of open space within an urban area of Wrexham, to the north of the town centre, Policy CLF4 of the UDP is of considerable relevance to the proposal. Policy CLF4 of the Wrexham UDP is clear that the redevelopment of playing fields and open spaces will not be permitted unless one of the three exceptions set out in the policy is met. The proposal to redevelop Nine Acre Playing Field for a school does not meet any of these exceptions, as we set out below.

- a) Redevelopment of only a small part of the site would allow the retention and enhancement of that existing facility

4.5 Although an area of public open space is proposed as part of the development through the provision of a woodland walk on the site, the majority of the existing area of open space will be lost for the school development. It is clear that the proposal does not comprise the development of a 'small part of the site'. Accordingly, the proposals do not meet this exception.

- b) The long term requirement for the facility has ceased and it would not lead to, or increase an existing shortfall of the facility in the immediate locality.

4.6 We appreciate that Wrexham Football Club are relocating to a new training ground, and accordingly, that the site is no longer required for their individual purposes. However, there remains a need for this important area of open space within the local community. Although Nine Acre is currently not available for public use, the area of open space provides important benefits to the local community. The open space is of high visual importance, providing an area of greenspace within this built-up area. The site provides amenity value, by contributing to the urban environment through the provision of an area of open space. The Nine Acre site also helps to support biodiversity, better air quality, contributes to flood management and provides a place of tranquillity within the built-up area.

4.7 As we have set out above, an opportunity is available for this area to become available for public use, thus improving the value of the site to the local community. The Nine Acre Community Group have developed a plan for this area of open space to be available for public use as a playing field, play area, woodland and pond.

4.8 The loss of this area of open space would lead to an increase in an existing shortfall of open space within the Maesydre ward area. The Council's own evidence in the form of the Open Space Audit and Assessment sets out that there is a deficit in amenity greenspace and provision for children and young people in Maesydre. The loss of Nine

Acre Playing Field as an area of open space would increase this shortfall. Accordingly, the proposals do not meet this exception.

c) The loss can be replaced with an equivalent or greater provision in the immediate locality.

4.9 The application does not include any plans to provide a replacement area of open space within the immediate locality. We appreciate that an area of public open space is proposed as part of the development, through the provision of a woodland walk, but the provision of 1.1ha of woodland walk does not offer equivalent or better provision when compared to the existing 2.5ha of open space on the site. Accordingly, the proposals do not meet this exception.

4.10 In accordance with the above assessment, it is evident that the application proposal is contrary to Policy CLF4 of the UDP.

4.11 As we have set out at Section 3 of this report, the Council are preparing a new Local Development Plan which will replace the UDP. The preparation of the LDP is at an advanced stage, with the plan having been submitted to the Planning Inspectorate and initial examination hearings having taken place. Given the advanced stage of the plan, we consider that it should carry weight in the decision-making process. The Deposit version of the LDP includes an updated policy with regards to open space. It is our view from the reading of this new open space policy, that the Council are placing an even greater emphasis on the need to protect open space in Wrexham, given the LDP policy requires all four exception criteria to be met in order for the development of open space to be permitted.

4.12 Emerging Policy CF1 of the deposit version of the LDP states that development will only be permitted on areas of open space where four criteria are met. As with Policy CLF4 of the UDP, it is our view that the proposals for the loss of Nine Acre Playing Field to accommodate a school do not meet any of these criteria.

- i. It would not cause or exacerbate a deficiency of open space in accordance with the most recent open space study;

4.13 As we have set out above, the Open Space Audit and Assessment sets out that there is a deficit in amenity greenspace and provision for children and young people in the Maesydre ward. The loss of Nine Acre Playing Field as an area of open space would increase this shortfall. Accordingly, the proposals do not meet this exception.

- ii. The open space has no significant functional or amenity value and there is no prospect of improvement;

4.14 Nine Acre Playing Field provides an important area of open space within the built-up area to the north of Wrexham town centre. The site currently provides important functional value by providing a location for Wrexham Football Club's training ground. We recognise that Wrexham AFC are relocating to an alternative site, but this does not mean that the open space will no longer have a significant functional or amenity value. As we have set out above, the area of open space provides a range of benefits in terms of its visual importance and amenity value. In addition, the Nine Acre Community Group have developed plans to ensure the continued use of the Nine Acre Field site to provide a playing field, play area, woodland and pond available for public use. Accordingly, there is a significant opportunity for the improvement of the site and for its greater enjoyment by opening the space up to public use. It is evident that the proposals do not meet the second exception of emerging Policy CF1.

- iii. The open space is of no significant quality

4.15 The area of open space at Nine Acre Playing Field is considered to be of good quality. Playing fields are provided at the site which are deemed of sufficient quality to be used by Wrexham Football Club and given this regular use the area is currently well maintained. If Wrexham Football Club are to vacate the site, alternative proposals for the site have been devised which will allow the continued use of the open space. The Nine Acre Community Group are committed to supporting the future maintenance of the site in order to ensure that it remains of significant quality in the future. Accordingly, the application proposal does not meet exception three of emerging Policy CF1.

- iv. Alternative open space and/or sport and recreation provision of equivalent or greater community benefit is made available in a suitable location.
- 4.16 The application proposal does not include any plans to provide an alternative area of open space of equivalent or greater community benefit within a suitable location. Accordingly, the proposals do not meet this exception. There is however the opportunity for the site to provide a greater community benefit if the site is retained as open space and opened for public use as proposed by the Nine Acre Community Group.
- 4.17 In accordance with the above assessment, it is clear that the application proposal is contrary to Emerging Policy CLF1 of the Deposit LDP.
- 4.18 As we have set out above, it is clear that the proposed development of a school at Nine Acre Playing Field is contrary to UDP Policy CLF4. The proposals also do not meet the requirements of UDP Strategic Policy PS2 as the development would materially detrimentally affect open space. We have also demonstrated above that the proposals are contrary to emerging LDP Policy CLF1. In addition, the scheme is contrary to Objective SO6 of the emerging LDP, as the proposals would conflict with the aims of this objective to provide high quality green infrastructure, including open space, to encourage healthy, active and safe lifestyles.
- 4.19 In addition to being contrary to local planning policy, there is clearly a conflict between the development proposal and national planning policy. Both PPW and TAN16 set out that areas of open space, including playing fields owned by public, private or voluntary organisations, should be protected from development. Both documents recognise the numerous and significant benefits that areas of open space provide to communities and the environment, and it is evident that these benefits would be lost should Nine Acre Playing Field be developed for a school.
- 4.20 The policy presumption against the loss of open space at Nine Acre Playing Field and the unsuitability of the site for development is highlighted by the Council's own evidence in the form of the Gypsy and Traveller Site Survey 2017, which was updated in 2020.

Nine Acre Playing Fields was assessed as part of this study as a potential Gypsy and Traveller site (reference 208). The assessment concluded that:

*'Fails Stage 1. Nine Acre Playing Field but not classed as POS. However, it is the nine acre playing field and is strategically important. There is also a shortfall of playing fields within this community. **The loss of this facility to development is therefore consider unacceptable.**'* (our emphasis)

- 4.21 A copy of the Council's assessment is attached at Appendix B.
- 4.22 Given the strong local and national policy presumption against the loss of open space, we would assume that the Council have undertaken an extensive site search exercise to ascertain whether there are alternative locations available for the development of the school which do not result in the loss of open space. Although the Design and Access Statement provided on the consultation portal advises that the application site has been selected as the most suitable, no details are provided with regards to the other sites which have been considered. We would also query whether the Council has considered the redevelopment or extension of an existing school site rather than developing on an area of valued open space. Given the lack of evidence which has been provided with regards to the site selection process, we consider the applicant's approach to be flawed.

Benefits of Retaining Open Space

- 4.23 The benefits of open space to the community are clearly set out in both national and local planning policy. TAN16 confirms that outdoor facilities, like playing fields can provide significant health and environmental benefits to the community. The importance of playing fields within towns is highlighted, given their contribution to the urban environment, support for biodiversity, and recreational and amenity value. The Council's own evidence base, in the form of the Open Space Audit, sets out that the effective provision of open space can deliver a wide variety of benefits including:

- Promotion of social inclusion and community cohesion;

- Enhancing health and well being;
- Promoting more sustainable development;
- Defining the local landscape character and providing an appropriate context and setting for built development and infrastructure;
- Supporting habitat and local wildlife;
- Promoting and protecting biodiversity and habitat creation; and
- Mitigating climate change and flood risk.

4.24 The open space provided at Nine Acre Playing Field provides important benefits to the local community by providing an area of greenspace within this built-up area. If the proposals to redevelop this site for a school are progressed, the significant benefits of this open space will be lost.

4.25 The alternative plan for the site, devised by the Nine Acre Community Group, offers a significant opportunity for additional benefits of the open space at Nine Acre Playing Field to be realised. The Nine Acre Community Group have developed an illustrative layout for the site, as shown at Appendix A, which would see a playing field, play area, woodland and pond delivered at this location. The improvements to this area of open space, and opening the space up to the public, would deliver all of the benefits set out above which are highlighted by the Open Space Assessment. As we have set out in Section 3, the Open Space Assessment has identified a deficit of amenity greenspace and provision for children and young people within the Maesydre ward area. The redevelopment of the site as proposed by the Nine Acre Community Group would respond to this deficit through the improved provision of amenity greenspace and children and young people's play provision.

Assessment Summary

4.26 In summary, the delivery of the proposal for a school on the Nine Acre Playing Field would have a significant adverse impacts through the loss of the benefits that this area of open space currently provides by way of its visual amenity, amenity value by providing an area of greenspace within the urban environment, contribution to biodiversity,

habitats, air quality and flood risk mitigation, amongst other benefits. As we have demonstrated above, the loss of this area of open space to development would be contrary to both local and national planning policy.

- 4.27 The Nine Acre Community Group have devised an alternative plan for the site which would deliver a range of benefits. An opportunity is available, through the implementation of the alternative proposals, to open the site up to public use thus assisting in the creation of healthy communities, promoting community cohesion, responding to the deficit in open space facilities in the local area, as well as ensuring the site continues to provide an important contribution to visual and local amenity, biodiversity and habitats, air quality and flood risk.

/5 CONCLUSION

- 5.1. PWA Planning is retained by Nine Acre Community Group to submit representations in response to the pre-application consultation undertaken by Wrexham Council ('the applicant') in relation to proposals to build a new primary school on Nine Acre Playing Field, Westminster Drive, Wrexham.
- 5.2. Nine Acre Playing Field is an area of open space which is currently used as Wrexham Football Club's training ground. The area of open space is located to the north of Wrexham town centre within an area of dense urban development.
- 5.3. The Nine Acre Community Group strongly objects to the proposals, which would result in the loss of this valued area of open space and its replacement with a primary school.
- 5.4. This report has demonstrated that the proposed development would be contrary to both national and local planning policy. There is a clear policy presumption which seeks to protect areas of open space, including playing fields, from development. The scheme does not meet any exceptions set out in the local development plan which would make the development acceptable.
- 5.5. The Nine Acre Community Group have developed an alternative scheme for the site which would allow it to be retained as open space, available for public use. These alternative proposals would allow a range of benefits to be realised in the local community.
- 5.6. On this basis, the Nine Acre Community Group strongly oppose the proposals for the development of a primary school on the site, and would urge the Council to consider the alternative plans for the site which would allow its continued use as an important area of open space.

APPENDIX A – NINE ACRE COMMUNITY GROUP MASTERPLAN FOR NINE ACRE PLAYING FIELD

A hand-drawn site plan for a school garden, showing various areas and features. The plan is bounded by RHOEWEN LANE to the north, CHESTER ROAD to the west, and WESTMINSTER DRIVE to the south. Key features include:

- Existing Beches**: Located along the north boundary.
- New Beech Trees Avenue**: A row of trees along the north boundary.
- Children Play Area**: A circular area with a slide and swing set.
- Daffodil and Bluebells in Green Glades**: A designated area for wildflowers.
- Woodland**: A large area of trees on the right side.
- Pond**: A small body of water with a **Timber Deck** around it.
- Flower Border**: A narrow strip of flowers.
- Annual Meadow**: A large open area in the center.
- Climbing Plants**: A designated area for climbing plants.
- Lawn**: A large open area in the center.
- Sports Pitch**: A large rectangular area on the left.
- Existing Fences Painted Dark Green**: A fence along the south boundary.
- Colourful annual Meadow**: A designated area for wildflowers.

APPENDIX B – GYPSY AND TRAVELLER SITE SURVEY (SITE REFERENCE 208)

Site Detail

Site Reference: 208 Area (Ha): 3.75 Grid Ref: E 33767 N 51278

Site: Westminster Drive

Other Ref:

Community: Acton Ward: Maesydre

Current Use: Nine acre Playing field

Urban Capacity Site Yes ☐ Urban Capacity Site No ☒ Ref

Candidate/Officer Site Yes ☐ Candidate/Officer Site No ☒ Re

Settlement Wrexham Town Selected as UCS ☐

Wholly within Settlement ☒ Planning History None Relevant ☒

Edge of Settlement ☐ Notes:

Partially Within Settlemen ☐

Outside Settlement ☐

Stage 1 Permanent Site > 1ha ☒ Area (Ha): 3.75 Nine Acre Playing Field

Stopping Site > 0.1ha ☒ In other use ☒ Use

Stage 1 Rule Site Out - Too Small < 0.1ha ☐ 2017 Too Small < 0.5ha ☐

Stage 2 Constraints These are constraints that will completely rule the site out.

Planning

☐ Flood Risk Zone C2

☐ Green Barrier?

☐ Green Wedge LDP?

☐ Special Landscape Area?

☐ Special Landscape Area LDP?

☐ Within SSSI?

☐ Within SAC?

☐ Within RAMSAR site?

☐ Within Local Wildlife Site?

☐ Conservation Area?

☐ Listed Buildings?

☐ Public Open Space?

☐ Public Open Space LDP?

☐ No Highway Access?

☐ World Heritage Site?

☐ AONB?

☐ Historic Park or Garden?

Other

☐ Country Park?

☐ Legal Constraints?

Stage 2 Rule Site Out 2014 ☐ Yes ☐ No

Stage 2 Rule Site Out 2017 ☐ Yes ☐ No

Stage 3 Constraints

These are constraints that may or may not rule out the suitability of the site and may be issues that would require input from a specialist such as Arboricultural Officer, Highway Officer etc.

Is this issue a constraint?	Details
Agricultural Land Grade 1, 2 and 3a	
Contamination	
Flood Risk Zone C1	
Site incompatible with adjoining land	
Woodlands or important groups of trees (inc those with TPO's)	
Infrastructure such as drainage and water will be unable to support development	
Mineral Resource Protection or Buffer	
Safe and Convenient Vehicular Access	
Site Topography - is not suitable/level?	
World Heritage Site Buffer	
SSSI/SAC/RAMSAR Buffer	
Ecology Impact	
Adjoins Listed Building/Conservation Area or Historic Park or Garden	
Adjoins AONB	
HSE Consultation Zone	
Archaeological Interest	
Glandwr Cymru (Canal) consultation area	
Other	

Stage 3 Rule Site Out 2014 ☐ Yes ☐ No

Stage 3 Rule Site Out 2017 ☐ Yes ☐ No

Stage 4 - Proximity to Services

	Points
<input type="checkbox"/> Bus stop within 800m?	
<input type="checkbox"/> Primary school within 2 miles?	
<input type="checkbox"/> Secondary School within 3miles?	
<input type="checkbox"/> Railway Station within 1000m?	
<input type="checkbox"/> Post Office within 800m?	
<input type="checkbox"/> Nearest shopping centre or local needs food shop within 800m?	
<input type="checkbox"/> Primary health care centre or surgery within 1200m?	
Score	

Overall Assessment

No Longer Council Owned ☐ Select Site? Yes ☐ No ☒ Maybe ☐ Approximate Developable Area (Ha) 0

Assessment and Conclusions 2014

Fails Stage 1. Nine Acre Playing Field but not classed as POS. However, it is the nine acre playing field and is strategically important. There is also a shortfall of playing fields within this community. The loss of this facility to development is therefore considered unacceptable.

Assessment and Conclusions 2017

Fails Stage 1. Nine Acre Playing Field but not classed as POS. However, it is the nine acre playing field and is strategically important. There is also a shortfall of playing fields within this community. The loss of this facility to development is therefore considered unacceptable.

2020 Update Sites 0.3 - 0.5 ha



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