

# 9 Acre Field

Save our field for the wellbeing of our community and our future generations.

Dear Councillor,

20<sup>th</sup> November 2020

## PROPOSED WCBC PLAN FOR DEVELOPING THE NINE ACRE FIELD, WREXHAM

We are contacting you regarding the Councils' plan to build a new primary school for St Marys on the Nine Acre Field, in Wrexham town centre.

The Nine Acre Field Action Group raised over £2500 from the local community to pay for a planning consultancy to evaluate the Councils' plan for the new school. A copy of their report is attached, and we urge you to read it carefully. It concludes that the plans contravene guidance set out by the Council itself, and by the Welsh Government as follows:

### Wrexham Council Unitary Development Policy

- <u>Strategic Policy PS2</u> states that "development must not materially, detrimentally affect countryside, landscape / townscape character, open space or the quality of the natural environment"
- <u>Strategic Policy PS3</u> states that "development should use brownfield land in preference to greenfield, particularly where greenfield land has amenity value"
- <u>Policy CLF4</u> states that "Re-development of sports grounds, playing fields and informal open spaces for other uses other than sport and recreation will not be permitted"

### Wrexham Council Deposit Local Development Plan

- <u>Emerging Objective SO6</u> "seeks to encourage healthy, active lifestyles achieved by providing high quality green infrastructure including open space"
- <u>Emerging Policy CF1</u> "seeks to protect, manage and enhance existing multi-functional open spaces, sport and recreation facilities"

### Welsh Government TAN16 (Sport, Recreation and Open Space) Technical Advice Note

- States that "open space, particularly with a significant amenity value, should be protected." The TAN 16 definition of open space is "all open space of public value.....which offers important opportunities for sport, recreation... and can also act as a visual amenity. Areas which are privately owned have amenity value"
- <u>Paragraph 3.7</u> states that "when playing fields are not required for their original purpose, they may be used to meet the need for informal recreation or amenity land in the wider community"

#### **Planning Policy Wales Edition 10**

- <u>Section 4.5</u> "sets out the importance of recreational spaces for health and well-being"
- <u>Paragraph 4.5.3</u> states that "formal and informal open green spaces should be protected from development, particularly in urban areas"
- <u>Paragraph 4.5.4</u> states that "all playing fields, whether owned by the public, private or voluntary organisations should be protected from development"

#### Wrexham Open Space Audit - March 2016

• This states that "Maesydre ward has a deficit in amenity green space of -1.71ha (hectares) and for children and young people -0.11ha, when assessed by Wrexham Councils' standard based on ward population."

As a community, the residents of Maesydre, Acton and Rhosddu place a very high value on our open spaces. Over the years, infill developments have seen the population increase, which in turn has placed a heavier burden on what little open green space we have left.

# If Nine Acre Field is built on, this irreplaceable green space will be lost forever, and the repercussions will be felt for generations to come.

The climate crisis and Covid-19 pandemic have highlighted the importance of green space to the health and well-being of urban communities everywhere, and Wrexham is no exception. The large number of objections submitted to the Councils' Pre-Planning Consultation showed the strength of feeling around the loss of the field. Indeed, our own survey found the overwhelming majority of respondents were in favour of Nine Acre Field being turned into a community park once Wrexham AFC move to new training facilities.

There is another option, but one that the Council seems to be proactively ruling out. In June 2018, the Council received the feasibility report it commissioned into the possibility of siting a new 420 place junior school on the former Groves School playing field. TACP Architects (who produced the report) showed that this was entirely feasible. An extract from this report is attached, but the full version can be viewed online at the following address:

http://9acre.org/images/reports/The\_Groves\_Site\_Feasibility\_Study\_2018.pdf

As planning permission to build on Nine Acre Field is not guaranteed, we question the Councils' motives in disposing of the Groves field to Wrexham AFC at a peppercorn rent. Until any decision is reached at the planning stage (and any subsequent appeals process), then removing the Groves field as a possible back-up plan seems illogical to say the least.

Council officers might correctly state that the covenant on the Groves school field prevents '*any construction other than a sports pavilion*'. This argument is null and void, because the Council is itself paying to challenge this covenant on behalf of the football club. Note that the Wrexham AFC financial contribution to this legal challenge is capped at £5K – the remainder of the bill will be footed by the Council.

A casual observer would have to ask why the Groves site was not the most obvious choice for the location of a new primary school? The feasibility study proved it was possible, and removal of the covenant is being mooted anyway. It would appear that the Council are making considerable efforts to remove the Groves field from the equation, but the question that has to be asked is why?

Furthermore, we have attempted to gain an understanding of the impact a new school on Nine Acre Field would have upon traffic on the surrounding roads. We submitted two requests under the Freedom of Information Act, but these have been refused.

• The first submission requested traffic volume data relating to the junction of Chester Road / Rhosnesni Lane and Prices Lane. The response we received indicated that the Council normally charges for this data, and we should contact the officer responsible, which we did.

Unfortunately, the officer confirmed that the Council did not hold data for this particular road junction. If this is the case, then forecasting the impact of an increase in traffic caused by building a new school on Nine Acre Field would be impossible.

 The second FOI request was to gain an insight into what the experts think of the Councils' plans for the field. It requested copies of all communications from the Highways Department on the matter. This request was refused – citing Section 36 – Effective Conduct of Public Affairs.

We have filed a complaint with the Information Commissioners Office, in the hope of gaining access to the information detailed in our request. Currently, the ICO has accepted our case, and we await further developments.

As a community group, we regret that is has been necessary for us to submit FOI requests to gain information that will have a direct impact on our quality of life. The Council should be much more transparent in its dealings with residents anxious about the loss of Nine Acre Field and other developments within our town.

The loss of green spaces in town centres is known to detrimentally affect the health and well-being of the people who live in them. More so in the years ahead, as we recover from the effects of the pandemic and adapt to climate change.

We thank you for reading this letter. Your assistance in raising public awareness of this matter and garnering support for our cause would be very much appreciated.

Yours faithfully,

M Jones

On behalf of **The Nine Acre Campaign Group** Email: info@9acre.org www.9acre.org