

Pre-Application Consultation Report

for

Nine Acres Field,
Wrexham



Ref: 19226

1.0 PROJECT DIRECTORY

1.1 APPLICANT

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

1.2 ARCHITECT

Lawray Architects
The Byre,
Croesnewydd Road
Wrexham
LL13 7YP

Contact:

Jennifer Wagstaff / Keith O'Hanlon
01978 357 887

wrexham@lawray.co.uk

2.0 INTRODUCTION

The proposal is to provide a replacement primary school on the unused Nine Acre field, off Chester Road, Wrexham, LL12 7AU, which is currently inaccessible to the public and was previously used as sports pitches in 2005. The development seeks to provide a new purpose built facility for St Mary's Catholic Primary School for 315 pupils and 45 nursery children, playing fields, a forest school area and car parking.

The school and parking development is proposed to capture a third of the Nine Acres site, with one third to be green playing fields and a School Forest park, and another third to be green open space, park or playing fields, to be maintained by the local authority and open to the public. The site is subject to a covenant permitting the development of an educational facility. The Open Space Assessment in 2016 highlights the demand for sports fields and playing pitches, thus the design seeks to include this as a substantial part of the site for use by the community, open to the public.

As a major planning application, the Planning (Wales) Act 2015 requires the Developer to undertake pre-application consultation prior to making the planning submission. This Pre-Application Consultation Report (PAC Report) has been prepared by Lawray Architects to summarise the process undertaken.

The consultation period was split into two phases due to the corona-virus pandemic, phase 1 commenced on 13th March 2020, expected to close 9th April 2020. The council ceased the application in light of the pandemic on 5th April 2020, four days before the deadline for comments. The second phase commenced 20th July 2020 until the 16th August 2020.

3.0 SITE NOTICE

A site notice was prepared in both Welsh and English, containing all of the information set out in Schedule 1B of the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016. The site notice was displayed in the locations shown below between the 13th March 2020 and 9th April 2020 and between 20th July 2020 and 16th August 2020. A copy of the site notice is included within Appendix A.



4.0 CONSULTEES

1A– CONSULTEES—ADJOINING OWNER OCCUPIERS

Letters were sent to approximately 70 owners and/or occupiers of land adjoining the site along Westminster Drive, Rhosnesni Lane, Chester Road, Lawson Close and the surrounding areas adjacent to Nine Acre Fields. The copy of the letter can be found in the Appendix A, which contains all the information set out in Schedule 1B of the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016.

Due to the covid-19 situation, the consultation period was carried out in two phases. The first phase began 13th March 2020, expected to close 9th April 2020. The council ceased the application in light of the pandemic on 5th April 2020, four days before the deadline for comments. The second phase commenced 20th July 2020 until the 16th August 2020. Responses from both phases have been considered.

In Phase 1 the total number of responses received was 87, 8 of which were duplicate submissions, and 4 were unrelated to the proposal. 15 were positive responses which expressed enthusiastic support toward the proposal. 59 responses were objections with various concerns and questions regarding the development.

In Phase 2 the total number of responses received was 334, 98 of which were duplicate submissions, and 5 were empty emails or enquiries unrelated to the proposal. 20 were positive responses in support of the development and school's relocation. 209 responses were objections expressing concern or asking questions. Of the 209 objections, it may be noted that 127 used a pre-written format which is included in Appendices B. It may also be noted that 77 of these objections were by the same 11 households and email addresses, and 39 responses were staff members of Acton Park Primary School.

The concerns raised in the objections, for BOTH phases of the consultation, have been listed under one common heading and grouped in the table under 'Wrexham Resident', with each concern addressed separately. It may be noted that the responses include those from outside of Wrexham and overseas.

CONSULTEES	SUMMARY OF RESPONSE	ACTION
Wrexham Resident Emails and/or letters	<ul style="list-style-type: none"> Concerns regarding the loss of Public Open Space, green space being taken from the community, and the loss of playing fields. Concerns regarding the loss of green space as a visual impact for local residents Concerns regarding the loss of wildlife habitat and the effect on Biodiversity Concerns regarding the impact on climate change due to loss of green space, the council's declaration of a climate emergency and the reduction in clean air due to loss of green space Concerns regarding the trees bordering Nine Acres field, whether they will be removed and questions regarding boundary treatment of the school site. 	<p>Nine Acres has been closed to the public since 2005, and has never been designated as Public Open Space. The development provides 34% of the land to be used by the community as open space fields. An additional 34% will remain as green playing fields.</p> <p>The school building accounts for only 4% of the overall field footprint, 68% will remain as green space. Trees and planting will be retained around the site, additional planting will provide additional screening from view. The current industrial palisade fence will be replaced by a visually appealing fence to further improve visual appearance the site.</p> <p>As above. Minimal impact on the field is, and will be, a key aspect of the design stage.</p> <p>As above. Sustainable design with minimal impact on the green space will be a key design driver for the school. The proposal is an opportunity to relocate an existing school which currently has a lack of green space for children to play, provide the community with recreational green space, and exercise climate change friendly developments.</p> <p>4 trees along the border of Rhosnesni Ln are proposed to be removed. 2no. are low quality saplings, 1no. is a shrub, and 1no. is a medium quality young oak, all of which will be replanted. Please see Arboricultural Report.</p>

CONSULTEES	SUMMARY OF RESPONSE	ACTION
Wrexham Resident Emails and/or letters continued	<ul style="list-style-type: none"> Concerns regarding traffic increase, the increased pollution caused by traffic increase, congestion on Chester Road and the roundabout, and safety issues due to busy roads. Concerns regarding bus bays along Chester Road causing additional congestion and safety issues. Concerns regarding on street parking along Westminster Drive, Rhosnesni Lane and the surrounding areas, including the use of the Beeches as parking. Raised concerns for road safety and presence of speeding cars. Concerns regarding increased flood risk, including statements made that flooding issues are present along Rhosnesni Ln and Westminster Dr. Concerns regarding the ownership of Nine Acres field, concerns that the council are to profit from the development and/or criticism of the diocese profiting from the re-location of the school. Concerns regarding the adjoining properties boundary treatment, the effect on neighbouring properties and the maintenance of edge treatments. Proposed use of the nearby Groves site (often referred to as Bromfield site) as an alternative location, including all statements made regarding its suitability. 	<p>Please refer to Travel Plan, which details sustainable travel goals. Minimal increase to traffic is foreseen, only 55% of pupils will travel by car. Many of these will lift-share, and many will arrive outside of the busier period for before and after-school day care/clubs.</p> <p>School bus bays along Chester road are now removed. School buses to now enter school site drop off area.</p> <p>Please see Travel Plan/Transport Assessment. Proposed 20mph restrictions on Rhosnesni Ln and Westminster Dr, raised pedestrian crossings and traffic calming measures to ensure safety in the area. It is hoped that presence of a school and new traffic measures will reduce current on street parking in area.</p> <p>Flood risk has been investigated, surface water flooding is not an issue at Nine Acre, that said, a Sustainable Drainage system will be used as per requirements in any case. Flooding on Westminster Rd and Rhosnesni Ln is confirmed due to gullies surcharging.</p> <p>Nine Acres is already in the ownership of the Local Authority, and will remain as such. It is the only available location within the town centre owned by the Local Authority within the Education & Early Intervention portfolio, (other than the Groves site which has been subject to a suitability study and discounted), and large enough to provide sufficient play area and as per the relevant building bulletin/specifications.</p> <p>The development will not encroach on, nor make changes to/maintain neighbouring properties, their boundaries, nor their planting. A secondary boundary fence, planting, or tree line may be added for additional security should this be of concern to the occupants, subject to safety requirements and planning conditions.</p> <p>The Groves/Bromfield site was subject to a suitability study which discounted the building for use as a primary school. The Local Authority are awaiting confirmation that the fields are surplus to Wrexham AFC needs. If so, a more comprehensive review of end of use is to be explored.</p>

CONSULTEES	SUMMARY OF RESPONSE	ACTION
Wrexham Resident Emails and/or letters continued	<ul style="list-style-type: none"> Concerns regarding the school's design Concerns regarding noise pollution, including objections to the noise of children playing at break time and the school bell. Concerns that the pupils of St Mary's Catholic Primary School will reduce post-Brexit. Concern for loss of the boxing club Alternative plans by Nine Acre Community Group proposed as open space/park design. Mention of (<i>paraphrased:</i>) "Wrexham UDP CLF4: Redevelopment of sports grounds not permitted unless a) most of the site is retained, b) long-term requirement has ceased or, c) the loss can be replaced by an alternative." <p>Template letter response:</p> <p>1: The proposed development would see St Mary's Catholic Primary School move from its current location to the Nine Acre Field. Almost all pupils and staff at this school will need to be transported to it from other parts of Wrexham and the surrounding area, which will increase vehicle movements, noise and emissions. Peak time congestion and parking demands will increase to unacceptable, unhealthy and frankly, unsafe levels.</p>	<p>The drawings and plans show a simple box to indicate the approximate size only. The school building has not yet been designed, and will be designed appropriately and sensitively to fit the local context.</p> <p>Planting will screen much of the noise. Sound of playing children and the school bell is unlikely to carry, particularly over traffic sounds already present. Noise from traffic volume increase unlikely to be noticeable above current traffic noise levels.</p> <p>Pupil numbers have not decreased and are not expected to do so.</p> <p>The boxing club is to be retained.</p> <p>Due to the site's covenants, Nine Acres cannot be used entirely as public open space. The inclusion of a school in the proposal allows the allocation of some of the land for use by the local community, though it will have to remain under legal ownership of the council. Thus, the alternative plans proposed are not viable without an education purpose.</p> <p>In response; a) 68% of Nine Acres will be retained, b) use by Wrexham AFC as a sports field has ceased since 2005, c) two new sports pitches to be created at Nine Acres as alternative/replacements, along with green open space for community use.</p> <p>A transport assessment has been carried out in response to the concerns. The findings show that 55% of pupils will arrive by car. Many do, and will continue to, arrive early and leave late, outside peak pick-up times, for before and after school care. 20 minute parking restrictions along nearby roads will reduce current traffic intake to the area which has been identified by the community as a current nuisance. All foreseeable traffic increase is being planned for and measures designed to cause as little impact as possible, and ample carparking space is provided within the scheme to deter parents using on-street parking.</p>

CONSULTEES	SUMMARY OF RESPONSE	ACTION
Wrexham Resident Emails and/or letters continued	<p>2: The Nine Acre Field has previously been considered unsuitable for development in July 2004, after Draft Development Guidance and the Executive Board rejected plans to sell the land for housing. At the time, the Council committed to retaining the field for public open space. The current proposal would deny local communities the known benefits of this invaluable open green space at a time when others are also under threat.</p> <p>3: The Nine Acre Field is a community resource. It should not be traded or sold off by the Council for short term benefit, at the expense of the long-term well-being of local communities. The Covid-19 pandemic has brought home to everyone the importance of clean air, healthy lifestyles and open green space in our towns and cities.</p> <p>4: Local communities are angry at the prospect of Nine Acre becoming private property owned by an organisation that has no accountability for its long term use.</p> <p>5: The proposed development would increase congestion and safety risks to drivers, vulnerable road users and pedestrians on all roads around the perimeter of the field, along with the arterial roads that feed into the area.</p> <p>6: The removal of open green space will adversely affect the local environment and ecology, and the health and well-being of residents across the whole of Wrexham, especially in the neighbouring wards.</p> <p>7. The Councils own 2016 Open Spaces Audit shows how scarce open green space is becoming in the town. It is hard to see how the proposed development aligns with the WCBC Biodiversity Action Plan and its recent declaration of a Climate Emergency. Although local residents have been denied physical access to the field for many years, it has remained an important visual amenity which would be permanently lost if the site is developed. Consequently, this will adversely affect the health and well-being of people ...</p>	<p>Previous developments were rejected on their own merit, and thus should not be compared to the current proposal, especially as they are vastly different schemes. The council have not committed to Nine Acres to be transferred to Public Open Space. They are, however, proposing to create green open space for use by the public within Nine Acre development, and provide safe green sports pitches retained on Nine acre field for use by the public and children.</p> <p>The field is not open to the public and hasn't been since 2004. The proposal seeks to give public access to the site retained as green land. No health risks are posed by the proposal. The field is not being sold, it will remain within the ownership of the Local Authority's Education department.</p> <p>Nine Acres will remain within the ownership of the Local Authority's Education department. The school, particularly one of such excellent reputation, will likely benefit the community long-term. The relocation will certainly be beneficial and highly valued by the school long-term, providing the children with green space to play and a purpose-built facility to enhance their learning located within a great community.</p> <p>Covered by previous points, also please see travel plan; improved pedestrian routes, new speed limits, new parking restrictions to reduce current on-street parking, are just some of the strategies that will improve road safety.</p> <p>Covered previously; 68% of field retained as green. Planting and additional trees to offset the effects of the school building. Permeable hardscaping and sustainable built elements.</p> <p>Covered under previous headings. Nine acre was not included in the 2016 Open Space Audit. Some Open Space has been retained.</p>

CONSULTEES	SUMMARY OF RESPONSE	ACTION
<p>Wrexham Resident</p> <p>Emails and/or letters</p> <p>Continued</p>	<p>..living in the town centre area for generations to come.</p> <p>8. The building of a school on this field would set a dangerous precedent for the potential redevelopment of the remaining open green spaces around Wrexham. The proposed development will destroy the character of the area forever.</p> <p>9: The plans presented for public consultation show a building that is totally out of keeping with local homes. It shares no common construction techniques or materials, and would be nothing more than a 'budget build metal box'.</p> <p>10: The field performs a critical surface water drainage function, which once covered with a building and car park, will cease to provide this element of protection to local residents. Rhosnesni Lane and Chester Road flood regularly during extended periods of rain, but in recent years, more serious flooding has occurred towards the roundabout at Park Avenue. The field is surrounded by homes in known medium to high risk surface water flooding zones. Any change to the overall surface water drainage efficiency could well impact on these properties.</p>	<p>Each planning application is a separate entity and considered on it's own merit. Nine Acres is a specific case whereby the school seek to benefit from the green space, and does not seek to lead by example except in it's efforts to retain as much green space as possible.</p> <p>As previously covered in the application and on the drawings, the building has not been designed. The 'box' is to indicate the maximum height and width of the building only. Neither construction techniques nor materials have been mentioned, due to a design not yet existing.</p> <p>Covered under previous headings.</p>
<p>Lesley Griffiths, MS on behalf of Nine Acre Community Group, see Appendix B.</p>	<p>Informs she has been contacted by members of the action group, and wishes to pass on their concerns.</p>	<p>No action required, concerns considered.</p>
<p>Catherine Johns, on behalf of Nine Acre Community Group, see Appendix B</p>	<p>Concerns already covered in this document</p>	<p>No action required, see points covered previously.</p>
<p>Acton Park School, see Appendix B. and NASUWT Cymru, see Appendix B</p> <p>(similar concerns in both documents)</p>	<p>Concerns already covered in this document, and: Questioned whether a new primary school is proposed or St Mary's Catholic Primary School will relocate to Nine Acre.</p> <p>Queried the demand for the new school</p>	<p>St Mary's Catholic Primary School intend to relocate to a new primary school on Nine Acre. Phrasing corrected to 'replacement school' for clarity.</p> <p>The demand is for green space, outdoor playing areas and a suitable building within to teach primary school children for the existing pupils of the school. St Mary's School are not increasing their capacity with the move to Nine Acre, as such it will not effect intake to other schools in the area.</p>

1B– COMMUNITY CONSULTEES

Key community consultees were identified and a letter was sent out providing notification of the proposed Planning Application. A copy of the letter can be found in the Appendix C, containing all the information set out in Schedule 1B of the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016. Letters were sent to:

CONSULTEES	SUMMARY OF RESPONSE	ACTION
<p>Local Councillor Cllr. Geoff Lowe</p> <p>Please see Appendix D</p>	<p>Recognises need for the primary school and notes his support of faith school education and its excellent standards.</p> <p>Expresses concern for The Beeches and adjacent streets residents due to;</p> <ol style="list-style-type: none"> 1. increase in traffic placing adults and children at risk, concerns regarding vehicle mounting the grass verge over tree roots. 2. Health concerns resulting from increased vehicles in the area. 3. Main entrance to school to impact on Beeches entrance concerns 4. Traffic pollution concerns 5. Mature trees on the beeches at risk from parked vehicles on the verge. (TPOS) 6. Antisocial behaviour 	<p>Most points previously addressed in this document.</p> <p>In response to these concerns, the site entrances have been split into 4 parts to relieve traffic surrounding each street and avoid congestion at entrance points. Coaches and staff will now enter through separate entrances. Parent drop-off parking now has two entrances to reduce congestion. Parents will also arrive in staggered time-frames. Prevention measures of public parking on the grass verge will be considered at a design stage in conversation with Highways Department and arborists subject to planning approval.</p> <p>Please read Travel Plan and Traffic Management documents for full details of traffic, congestion, pollution and safety measures that have now been adopted in response.</p> <p>Unclear reference to antisocial behaviour, however the pupils of the school are under 11 years of age and are highly unlikely to cause antisocial behaviour.</p>
<p>Acton Community Council [REDACTED]</p> <p>Please see Appendix D</p>	<p>Points not yet covered in this document: Considers that a Wellbeing Impact Assessment must be made to ensure a positive long-term impact.</p> <p>Proposal to remove mature trees</p> <p>Trees not shown accurately on map</p>	<p>The mitigation measures employed since the consultation cover some of the HIA's recommendations. Further mitigation will be a priority once design stage is reached, and an HIA, if required by planning condition will be happily provided.</p> <p>No mature trees are being removed</p> <p>See Arboricultural Report for accurate drawings.</p>

1C– SPECIALIST CONSULTEES

Relevant specialist consultees were identified and a letter was sent out providing notification of the proposed Planning Application. A copy of the letter can be found in the Appendix E, containing all the information set out in Schedule 1C of the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016. Letters were sent to:

CONSULTEES	SUMMARY OF RESPONSE	ACTION
Dwr Cymru - Welsh Water See Appendices F	No objection in principle Sewerage can be accommodated within the public system No problems are envisaged with the Waste Water Treatment Works for the treatment of domestic discharges from this site. Surface water not to flow into the public sewerage network, SuDS report to be provided as a condition for Welsh Water approval.	No action required. No action required. No action required. Submit drainage design for SAB approval as planned in accordance with Schedule 3 of the Flood and Water Management Act 2010
Natural Resources Wales See Appendices F	Considered not to be a specialist consultee.	No action required.
Senior Flood Manager—Wrexham Environment and Planning Department See Appendices F	Flooding on Westminster Drive, Rhosnesni Lane and adjacent streets identified as caused by surcharging gullies. Surface water flooding at risk in nearby areas.	No action required. Covered by SuDS design pending as requirement in any case.
Wrexham Highways Department	No response received.	No action required.
Environmental Protection—Wrexham Environment and Planning Department	No response received.	No action required.
Sports Wales See Appendices F	Reference to Para 4.5.4 of Planning Policy Wales, SW object to application based on only a small amount of site to be retained, and no alternative provision supplied. If above policy can be satisfied, SW will reconsider objection	68% of field now retained, two sports pitches to be provided plus an open space with potential to be used as full sports pitch.

5.0 INFORMATION

Site Notices and Letters sent to Consultees contained information about the upcoming planning application and a link to a website address where copies of the plans and other supporting documents were made available at:

www.yourvoicewrexham.net

The following information was made available in support of the pre-application consultation process:

- NAS-A-091001-P03 Cynllyn Safle Ddangosol - Indicative Site Plan at A3
- NAS-A-093001-P03 Golygfeydd 3D Ddangosol - Indicative 3D Views at A3
- NAS-A-093002-P03 Golygfeydd Stryd 3D Ddangosol - Indicative 3D Street Views at A3
- NAS-A-093003-P03 Drychiadau Ddangosol - Indicative Elevations at A3
- Planning forms
- Design, Access and Planning Statement at A4 in English and Welsh formats

7.0 CONCLUSION

This PAC Report summarises the pre-application consultation process undertaken and includes a summary of the comments made and any actions that have been taken. These actions will be reflected in the outline planning application made to Wrexham County Council Planning Department and in a future full planning application in the case that outline permission is granted.

SCHEDULE 1

Pre-application notices

SCHEDULE 1B

**PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING
PERMISSION**

Town and Country Planning (Development Management Procedure) (Wales) Order 2012

PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION

NOTICE UNDER ARTICLES 2C AND 2D

(to be served on owners and/or occupiers of adjoining land and community consultees; and displayed by site notice on or near the location of the proposed development)

Purpose of this notice: this notice provides the opportunity to comment directly to the developer on a proposed development prior to the submission of a planning application to the local planning authority ("LPA"). Any subsequent planning application will be publicised by the relevant LPA; any comments provided in response to this notice will not prejudice your ability to make representation to the LPA on any related planning application. You should note that any comments submitted may be placed on the public file.

Proposed development at: **New Primary School, Nine Acre, Westminster Drive, Wrexham.**

I give notice that: Wrexham County Borough Council.

Is intending to apply for planning permission to: Wrexham County Borough Council.

You may inspect copies of:

- The proposed application
- The site plan and location plan
- Other supporting documents

Online at: www.yourvoicewrexham.net

(or)

Paper copies of the information will be provided on written request either via postal request to, The Byre, Croesnewydd Hall, Wrexham, LL13 7YP, or via email to wrexham@lawray.co.uk. The drawings will be provided in A3 size. Please request paper copies if required within 14 days of receipt of this notice, to ensure they can be provided within the 28-day consultation period.

Anyone who wishes to make representations about this proposed development must write to the email address nineacreconsultation@wrexham.gov.uk. Or alternatively, please send correspondence to Housing and Economy Department, Ruthin Road, Wrexham. LL13 7TU, for the attention of Nine Acre Consultation.

By: 16th August 2020

Signed:  Date: 20.07.2020

ATODLEN 1

Hysbysiadau cyn-ymgeisio

ATODLEN 1B

CYHOEDDUSRWYDD AC YMGYNGHORI CYN GWNEUD CAIS AM GANIATAD CYNLLUNIO

Gorchymyn Cynllunio Gwlad a Thref (Gweithdrefn Rheoli Datblygu) (Cymru) 2012

CYHOEDDUSRWYDD AC YMGYNGHORI CYN GWNEUD CAIS AM GANIATAD

CYNLLUNIO HYSBYSIAD O DAN ERTHYGLAU 2C A 2D

(I'w gyflwyno i berchnogion a/neu feddianwyr tir cyffiniol ac ymgynghoreion cymunedol; ac i'w arddangos drwy hysbysiad safle ar neu gerllaw lleoliad y datblygiad arfaethedig)

Diben yr hysbysiad hwn: mae'r hysbysiad hwn yn rhoi cyfle i wneud sylwadau yn uniongyrchol i'r datblygwr ynglyn a datblygiad arfaethedig cyn cyflwyno cais am ganiatad cynllunio i'r awdurdod cynllunio lleol ("ACLI"). Bydd unrhyw gais cynllunio dilynol yn cael ei hysbysebu gan yr ACLI perthnasol; ni fydd unrhyw sylwadau a ddarperir gennych wrth ymated i'r hysbysiad hwn yn lleihau dim ar eich gallu i gyflwyno sylwadau i'r ACLI ar unrhyw gais cynllunio cysylltiedig. Dylech nodi y gellir gosod unrhyw sylwadau a gyflwynir gennych yn y ffeil gyhoeddus.

Datblygiad Arfaethedig yn: **Ysgol Gynradd Newydd, Nine Acre, Rhodfa San Steffan, Wrecsam**

Rwyf yn hysbysu bod: Cyngor Bwrdeistref Sirol Wrecsam.

Yn bwriadu gwneud cais am ganiatad cynllunio: Cyngor Bwrdeistref Sirol Wrecsam.

Gellwch archwilio copïau o'r canlynol:

- Y cais arfaethedig
- Y planiau a location plan
- Dogfennau ategol eraill request

Ar-lein tn: www.yourvoicewrexham.net

(neu)

Gallech weld copïau papur o'r wybodaeth gan ymgeisio naill ai trwy post i, The Byre, Croesnewydd Hall, Wrecsam, LL13 7YP, neu drwy e-bost i wrexham@lawray.co.uk. Darperir y lluniadau mewn maint A3. Gofynnwch am gopïau papur os oes angen o fewn 14 diwrnod ar ôl derbyn yr hysbysiad hwn, er mwyn sicrhau y gellir eu darparu o fewn y cyfnod ymgynghori 28 diwrnod.

Mae'n rhaid i unrhyw un sy'n dymuno gwneud sylwadau ynglyn a'r datblygiad arfaethedig hwn defnyddio'r e-bost nineacreconsultation@wrexham.gov.uk. Fel arall gallwch anfon gohebiaeth at WCBS, Adran Tai a'r Economi, Ffordd Rhuthun, Wrecsam. LL13 7TU, at sylw Ymgynghoriad Nine Acre.

Erbyn: 16^{eg} o Awst 2020

Llofnod:



Dyddiad: 20.07.2020

Pennaeth Tai a'r Economi/Head of Housing and Economy
Stephen Bayley

Adran Tai a'r Economi, Ffordd Rhuthun, Wrexham, LL13 7TU
Housing and Economy Department, Ruthin Road, Wrexham, LL13 7TU
www.wrexham.gov.uk www.wrexham.gov.uk



Ein Cyf/Our Ref
Dyddiad/Date

Nine Acre Consultation
20 Gorffennaf 2020

Y Perchennog/Deilydd

Annwyl Syr/Fadam,

**GORCHYMYN CYNLLUNIO GWLAD A THREF (GWEITHDREFN RHEOLI
DATBLYGU) (CYMRU) (DIWYGIAD) 2016.**

**YMGYNGHORIAD CYN YMGEISIO AR GYFER YSGOL GYNRADD NEWYDD, NINE
ACRE, RHODFA SAN STEFFAN, WRECSAM**

Cyfeirnod Grid: E 333760 N 351271

Fel rhan o'n proses ymgynghori cyn ymgeisio sy'n berthnasol i bob cais cynllunio ar gyfer datblygiadau "sylweddol" a cheisiadau ar gyfer datblygiadau o bwysigrwydd cenedlaethol mae'n bosib fod gennych sylwadau yr hoffech i'r Awdurdod eu hystyried cyn y cyflwynir Cais Cynllunio swyddogol i'w gymeradwyo yn y dyfodol.

Gellir gweld y dogfennau perthnasol a baratowyd ar ein gwefan
www.yourvoicewrexham.net/?Language=cy

Bydd copïau papur o'r wybodaeth ar gael os oes angen, gan ymgeisio naill ai trwy post i, The Byre, Croesnewydd Hall, Wrexham, LL13 7YP, neu drwy e-bost i wrexham@lawray.co.uk. Darperir y lluniadau mewn maint A3. Gofynnwch am gopïau papur o fewn 14 diwrnod ar ôl derbyn yr hysbysiad hwn, er mwyn sicrhau y gellir eu darparu o fewn y cyfnod ymgynghori 28 diwrnod.

Byddwn yn defnyddio'r we i gasglu barn pobl, gan ddefnyddio'r e-bost nineacreconsultation@wrexham.gov.uk Fel arall gallwch anfon gohebiaeth at y cyfeiriad uchod, at sylw Ymgynghoriad Nine Acre.

Sicrhewch bod unrhyw sylwadau yr hoffech eu gwneud yn cael eu derbyn erbyn 16 Awst 2020 os gwelwch yn dda.

Yn ddiffuant,

Keith O'Hanlon,
Lawray Architects ar ran Cyngor Bwrdeistref Sirol Wrexham

*Rydym yn croesawu gohebiaeth yn Gymraeg.
Byddwn yn ymateb i unrhyw ohebiaeth yn Gymraeg ac ni fydd hyn yn anwain at unrhyw oedl.*

*We welcome correspondence in Welsh.
We will respond to any correspondence in Welsh and this will not lead to any delay.*

Pennaeth Tai a'r Economi/Head of Housing and Economy
Stephen Bayley

Adran Tai a'r Economi, Ffordd Rhuthun, Wrexham. LL13 7TU
Housing and Economy Department, Ruthin Road, Wrexham. LL13 7TU
www.wrexham.gov.uk www.wrexham.gov.uk



Eich Cyf/Your Ref	PD/2014/031
Ein Cyf/Our Ref	20/07/2020
Dyddiad/Date	Nick Bateman
Gofynner am/Ask for	01978 315657
Rhif Union/Direct Dial	18001
Cyfnwidiad Testun/Text Relay:	nick.bateman@wrexham.gov.uk
E-bost/E-mail:	

Dear Sir/Madam,

TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)
(WALES) (AMENDMENT) ORDER 2016.

PRE-APPLICATION CONSULTATION FOR NEW PRIMARY SCHOOL, NINE ACRE,
WESTMINSTER DRIVE, WREXHAM.

Grid Ref: E 333760 N 351271

As part of our pre application consultation process that applies to all planning applications for "major" developments and applications for developments of national significance I believe you may have comments that you may wish the Authority to consider before a formal Planning Application is submitted for future approval. If you believe the pre application consultation cannot be determined without details of this matter you must let me know as a matter of extreme urgency so that I can provide them to you.

The relevant documents prepared can be viewed at www.yourvoicewrexham.net

Paper copies of the information will be provided on written request either via postal request to The Byre, Croesnewydd Hall, Wrexham, LL13 7YP, or via email to wrexham@lawray.co.uk. The documents will be provided in A3 size. Please request paper copies if required within 14 days of receipt of this notice, to ensure they can be provided within the 28-day consultation period.

We will be using the internet to gather people's views using the email nineacreconsultation@wrexham.gov.uk. Or alternatively please send correspondence to Housing and Economy Department, Ruthin Road, Wrexham, LL13 7TU, for the attention of Nine Acre Consultation.

Please can you ensure that any comments etc. you do wish to make are received by the 16th August 2020. If you have previously replied to the consultation that was ceased due to Covid-19 restrictions, your views will be carried forward to this consultation.

Yours Faithfully,

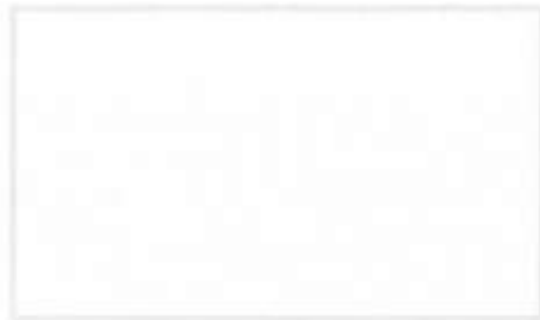
Keith O'Hanlon,
Lawray Architects on behalf of Wrexham County Borough Council

*Rydym yn croesawu gohebiaeth yn Gymraeg.
Byddwn yn ymateb i unrhyw ohebiaeth yn Gymraeg ac ni fydd hyn yn arwain at unrhyw oedi.*

*We welcome correspondence in Welsh.
We will respond to any correspondence in Welsh and this will not lead to any delay.*

APPENDIX B
RESPONSES FROM 'WREXHAM RESIDENTS' REFERENCED IN DOCUMENT

To: Nine Acre Consultation
Wrexham County Borough Council
Housing & Economy Dept
Ruthin Road
Wrexham
LL13 7TU



Dear Sirs,

Subject: Objection to Wrexham County Borough Councils proposal to build a Primary School on the Nine Acre Field in Wrexham

I am writing to object to the Councils proposal to build on the Nine Acre Field for the following reasons:

- 1: The proposed development would see St Mary's Catholic Primary School move from its current location to the Nine Acre Field. Almost all pupils and staff at this school will need to be transported to it from other parts of Wrexham and the surrounding area, which will increase vehicle movements, noise and emissions. Peak time congestion and parking demands will increase to unacceptable, unhealthy and frankly, unsafe levels.
2. The Nine Acre Field has previously been considered unsuitable for development in July 2004, after Draft Development Guidance and the Executive Board rejected plans to sell the land for housing. At the time, the Council committed to retaining the field for public open space. The current proposal would deny local communities the known benefits of this invaluable open green space at a time when others are also under threat.
3. The Nine Acre Field is a community resource. It should not be traded or sold off by the Council for short term benefit, at the expense of the long-term well-being of local communities. The Covid-19 pandemic has brought home to everyone the importance of clean air, healthy lifestyles and open green space in our towns and cities.
4. Local communities are angry at the prospect of the Nine Acre Field becoming private property owned by an organisation that has no public accountability for its long term use.
5. The proposed development would increase congestion and safety risks to drivers, vulnerable road users and pedestrians on all roads around the perimeter of the field, along with the arterial roads that feed into the area.
6. The removal of open green space will adversely affect the local environment and ecology, and the health and well-being of residents across the whole of Wrexham, especially in the neighbouring wards.

7. The Council's own 2016 Open Spaces Audit shows how scarce open green space is becoming in the town. It is hard to see how the proposed development aligns with the WCBC Biodiversity Action Plan and its recent declaration of a Climate Emergency. Although local residents have been denied physical access to the field for many years, it has remained an important visual amenity which would be permanently lost if the site is developed. Consequently, this will adversely affect the health and well-being of people living in the town centre area for generations to come.

8. The building of a school on this field would set a dangerous precedent for the potential redevelopment of the remaining open green spaces around Wrexham. The proposed development will destroy the character of the area forever.

9. The plans presented for public consultation show a building that is totally out of keeping with local homes. It shares no common construction techniques or materials, and would be nothing more than a 'budget build metal box'.

10. The field performs a critical surface water drainage function, which once covered with a building and car park, will cease to provide this element of protection to local residents. Rhosnesni Lane and Chester Road flood regularly during extended periods of rain, but in recent years, more serious flooding has occurred towards the roundabout at Park Avenue. The field is surrounded by homes in known medium to high risk surface water flooding zones. Any change to the overall surface water drainage efficiency could well impact on these properties.

In view of its obvious value to Wrexham as an open green space, a much more viable use for the Nine Acre Field would be to develop it as a community owned and managed park once Wrexham AFC has no further use for it. I support the current efforts by the Nine Acre Neighbours group to visualise this and identify funding to support its development.

Yours faithfully,



Lesley Griffiths

Aelod o'r Senedd dros Wrexham

Member of the Senedd for Wrexham

Our Ref: LG6015

Nine Acre Consultation
Wrexham County Borough Council
Housing & Economy
Ruthin Road
Wrexham
LL13 7TU

Senedd Cymru



Welsh Parliament



14 August 2020

Dear Sir/Madam

Re: Pre-Planning Consultation for New Primary School on Nine Acre Field

I have been contacted by several constituents expressing their concerns relating to the above development.

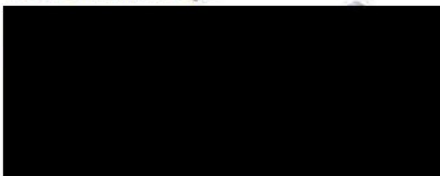
Many are members of the Nine Acre Community Group and strongly oppose the proposals for the development of a primary school on the site. They're concerned about the lack of green space and wish to save the field for future public use. The Group urge the Local Authority to consider the alternative plans for the site which would allow its continued use as an important area of open space.

I wish to pass on their concerns via the official consultation and I would be grateful if you could take their views into consideration.



Welsh Labour Llafur Cymru

Yours faithfully.



Lesley Griffiths, MS

You can view our Privacy Policy at <http://www.lesleygriffiths.co.uk/en/privacy-policy/> or contact me for a paper copy.



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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316 Blackpool Road, Fulwood, Preston PR2 3AE



REPORT CONTROL

Document	Objection on behalf of Nine Acre Community Group
Project	Nine Acre Playing Field, Westminster Drive, Wrexham
Client	Nine Acre Community Group
Job Number	19-821
File storage	Z:\PWA Planning\Client files\19-639 to 19-837\19-821 Nine Acre Playing Field, Westminster Drive, Wrexham\4. PWA Docs

Document Checking

Primary Author:	[REDACTED]	Initialled:	CJ
Contributor:		Initialled:	
Reviewer:	[REDACTED]	Initialled:	LL

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Issue	Date	Status	Checked for issue
1	06.08.2020	DRAFT	YES - LL
2	11.08.2020	FINAL	YES - LL
3			
4			

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3	PLANNING POLICY CONTEXT
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4	PLANNING POLICY ASSESSMENT
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5	CONCLUSIONS
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Appendices

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

Appendix B – Gypsy and Traveller Site Survey, Nine Acre Playing Field Assessment (Site Reference 208)

/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.

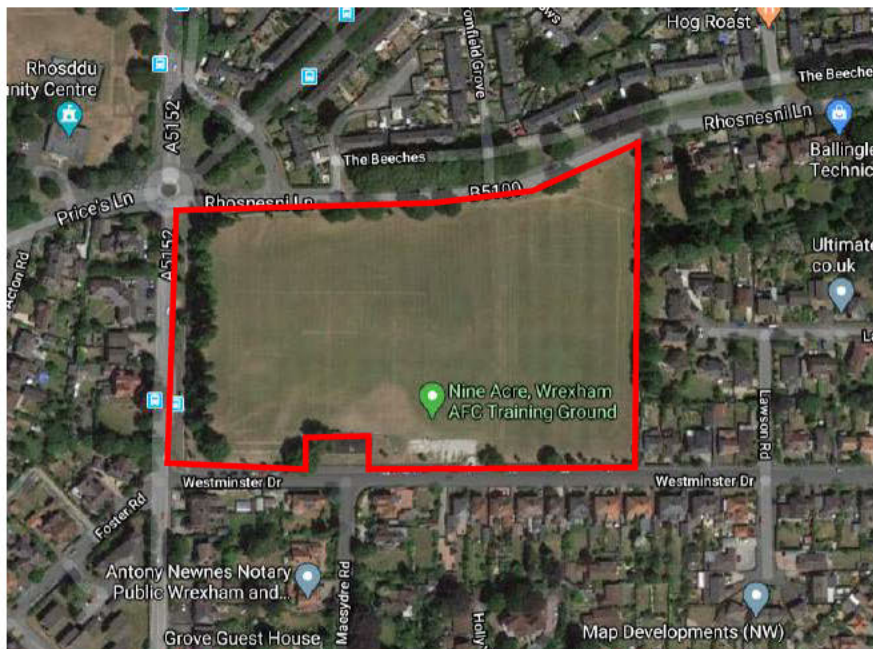


Figure 1: Aerial image showing the location of the site (not to scale)

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.

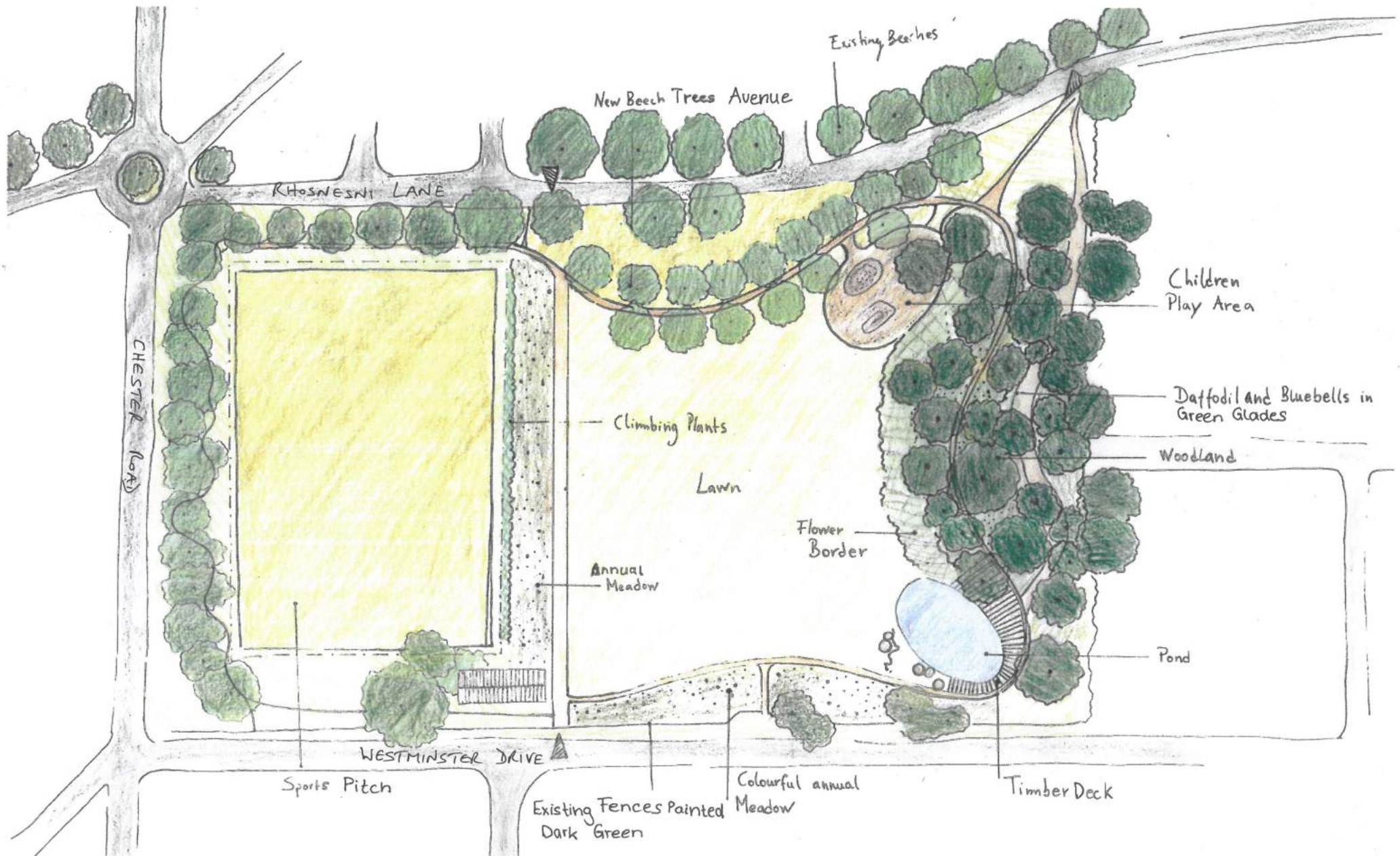
- 4.27 The Nine Acre Community Group have devised an alternative plan for the site which would deliver a range of benefits. An opportunity is available, through the implementation of the alternative proposals, to open the site up to public use thus assisting in the creation of healthy communities, promoting 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

Imagine 9 Acre Field as a beautiful park!



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	<input type="checkbox"/>	Urban Capacity Site No	<input checked="" type="checkbox"/>	Ref				
Candidate/Officer Site Yes	<input type="checkbox"/>	Candidate/Officer Site No	<input checked="" type="checkbox"/>	Re				
Settlement	Wrexham Town		Selected as UCS	<input type="checkbox"/>				
Wholly within Settlement	<input checked="" type="checkbox"/>	Planning History		None Relevant	<input checked="" type="checkbox"/>			
Edge of Settlement	<input type="checkbox"/>	Notes						
Partially Within Settlement	<input type="checkbox"/>							
Outside Settlement	<input type="checkbox"/>							

Stage 1	Permanent Site > 1ha	<input checked="" type="checkbox"/>	Area (Ha)	3.75	Nine Acre Playing Field
	Stopping Site > 0.1ha	<input checked="" type="checkbox"/>	In other use	<input checked="" type="checkbox"/>	Use

Stage 1 Rule Site Out - Too Small < 0.1ha	<input type="checkbox"/>	2017 Too Small < 0.5ha	<input type="checkbox"/>
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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	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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Stage 2 Rule Site Out 2017	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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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	<input type="checkbox"/>
Contamination	<input type="checkbox"/>
Flood Risk Zone C1	<input type="checkbox"/>
Site incompatible with adjoining land	<input type="checkbox"/>
The above should include an assessment of whether the adjoining land use would be incompatible with the proposed use as a G and T site. Examples include proximity to refuse sites, rivers/canals, dual carriage ways, railway lines, industrial estates, existing or proposed railway sites. The issue should be clearly referenced in the details box.	
Woodlands or important groups of trees (inc those with TPO's)	<input type="checkbox"/>
Infrastructure such as drainage and water will be unable to support development	<input type="checkbox"/>
Mineral Resource Protection or Buffer	<input type="checkbox"/>
Safe and Convenient Vehicular Access	<input type="checkbox"/>
Site Topography - is not suitable/level?	<input type="checkbox"/>
World Heritage Site Buffer	<input type="checkbox"/>
SSSI/SAC/RAMSAR Buffer	<input type="checkbox"/>
Ecology Impact	<input type="checkbox"/>
Adjoins Listed Building/Conservation Area or Historic Park or Garden	<input type="checkbox"/>
Adjoins AONB	<input type="checkbox"/>
HSE Consultation Zone	<input type="checkbox"/>
Archaeological Interest	<input type="checkbox"/>
Glandwr Cymru (Canal) consultation area	<input type="checkbox"/>
Other	<input type="checkbox"/>

Stage 3 Rule Site Out 2014	<input type="checkbox"/> Yes	<input type="checkbox"/> No
----------------------------	------------------------------	-----------------------------

Stage 3 Rule Site Out 2017	<input type="checkbox"/> Yes	<input type="checkbox"/> No
----------------------------	------------------------------	-----------------------------

Stage 4 - Proximity to Services

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

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.

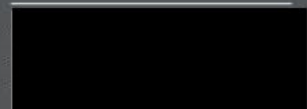
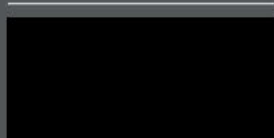
2020 Update Sites 0.3 - 0.5 ha

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.



www.pwaplanning.co.uk





Tuesday, August 11th 2020

RE: The Governing Body of Acton Park Primary School's response to the proposal to build a *New Primary School on Nine Acre.*

The Governing Body of Acton Park Primary School writes regarding Wrexham County Borough Council's proposal to build a new primary school at the Nine Acre Site on Chester Road. We extend a vote of thanks for allowing Acton Park Primary School to submit an official Collective Response, on behalf of all our staff, children and parents.

Upon reading the literature accompanying this proposal we seek clarification regarding if this is indeed a 'new' school or a relocation of an existing one. We are under the impression that this *Cadnant Planning* consultation document does not give a stakeholder the full and complete picture of what is going on here.

The consultation document speaks of a, "**New**", 360 pupil capacity primary school, no less than three times:

"315 place new primary school and 45 place nursery."

(Section 1.3, Page 1; Section 3.1, Page 5; Section 3.2, Page 5; Section 3.6, Page 6).

This is not limited to *Cadnant Planning's* literature, indeed on Wrexham Council website's *Your Voice* webpage, it states:

"Why are we doing this?:"

Proposal to build a new primary school on land off Chester Road Wrexham . . . This consultation is an opportunity to learn about the proposals for a new primary school for your area".



Tsqot Gynedd Parc Aeron
Wrecsam

Gwefan/Website:

Your Voice Wrexham (webpage)

"A new primary school", is mentioned 3 times on this Council webpage.

Acton Park Primary School is under the impression that the Nine Acres school - **if it goes ahead** - will not be a new primary school but rather a relocation of the existing school, St. Mary's Catholic Primary School. Why are we under this impression because of reports in the local media. Particularly the 2/9/19 Wrexham.com piece, **"Nine Acres Again!!!"** and the article in [The Leader](#), **"Plans to put primary school on Nine Acre field in Wrexham would cause 'nightmare' for neighbours"**, from 10/3/20. The latter of these two pieces declares:

"St Mary's Catholic Primary School, which is currently based on Lea Road in the town centre, recently announced it would be relocating to the site."

Neither the **Cadnant Planning** consultation document or Wrexham Council's **Your Voice**, contain any mention of St Mary's Primary School instead repeatedly referring to a, **"New primary school"**)?

Whether it be a new school or a school that is relocating, we the Governing Body of Acton Park Primary School formally oppose to the proposals to build a school on the Nine acre, as this would greatly impact our and other local schools greatly.

In our collective response we will be basing our objection for several reasons.

1. New school.

Actual demand?

In Section 1.3 it states **The development would provide a 315 place primary school with 45 nursery places to meet the demand for additional school places locally.** Here we are wondering what and where the actual demand is? If a new school is being built for additional spaces in the local area then we would question this as not quite true. There is no mention anywhere in the document stating what and how much the demand is.

Whilst we don't object to the fact that places in town centre schools are rising, why aren't they being pointed to the school which do have surplus places available – such as Acton Park Primary School. We are only a short distance away from the centre of Wrexham, and deemed a town centre school.

The numbers attending Acton Park Primary School have steadily decreased over the last few years:

	Nursery	Reception	Whole School	Difference
2016 / 2017	50	57	468	
2017 / 2018	59	50	471	+3
2018 / 2019	33	60	442	-29
2019 / 2020	31	41	420	-22
2020/ 2021	33	35	392	-28

Expansion of Barker's Lane Primary School.

Between October and December 2018 Wrexham Council proposed increasing the capacity of Barker's Lane C.P. by 50% (from 210 pupils to 315 pupils). Again this was due to rising demand in Wrexham Town Centre. Once again there is no objection to the fact that numbers in the town centre are rising, the fact that a school that is slightly further away from the town centre was decided to take on the additional spaces needed. Acton Park C. P. is situated only 0.7 miles away from Barker's Lane C.P, yet it is closer to the town centre.

At the time of this consultation, we raised an objection to the expansion of Barker's Lane, which was mentioned in the objection report.

Numbers of oversubscription/projections Local School redundancy	
2 Respondees referred to Numbers of oversubscription/projections within their objections and 2 referred to impact on Local schools.	
<p>'Projected Growth within the Town Centre: The survey of parental preferences and demand for school places in the Town Centre within the Consultation document does not demonstrate that such demographic growth and demand is from pupils that reside in the Borrass Park ward who would choose to attend the Barkers Lane English Medium School; nor that the proposal to increase the pupil numbers by 105 would address any substantial over-subscription from such parental preference and choices when compared to other nearby primary schools'(Community Council)</p> <p>'Impact on proposal on surrounding schools: Contrary to the statement in the Consultation Document, the</p>	<p><i>The demand for school places within the town centre is increasing with a number of town centre schools currently over-subscribed.</i></p> <p><i>The Council's forecasts show that this trend is continuing and demand for town centre places is above the published admission numbers.</i></p> <p><i>Where funding allows, the Local Authority will seek to increase available primary places, so as to meet local demand, reduce class sizes, improve the distribution of school places and provide more choice for parents.</i></p> <p><i>The current situation at Acton Park is unrelated to these proposals. The proposals intend to alleviate pressure from all town centre schools by reducing overall class sizes, as</i></p>

<p>Community Council wishes to point out that its Governors at Acton Community School have confirmed that there is currently a shortfall of pupils and Teachers may be facing redundancy. The development of Barkers Lane School should not come at the expense of any other Grade A Primary School in the Acton Community or Town Centre' (Community Council)</p> <p>'Some of the detail in the Consultation document is challenged, particularly the statement that Acton Park Primary School has no capacity' Community Council.</p>	<p><i>determined by Cabinet secretary for Education, Kirsty Williams with the introduction of the fund to address infant class sizes.</i></p> <p><i>This proposal seeks to increase the capacity at Barker's Lane CP and reflects a strategic needs assessment which considered capacity, location, site and building constraints, amalgamations and building conditions of all town centre schools.</i></p> <p><i>The site at Barker's Lane CP was identified as a site that can accommodate a 315 place school with 45 nursery places using 'Measuring the capacity of schools in Wales, Welsh Government Circular No: 021/2011(2011) and requirements of a school of this size under Building Bulletin 98.</i></p> <p><i>This would allow us to reduce class sizes and best meet local demand for town centre primary places.</i></p> <p><i>Acton Park Primary School is currently a 420 capacity school. As the Local Authority do not intend to increase capacity above 420 in any of its primary schools at this moment in time, it would be unable to expand at this site. Therefore there is 'no capacity' to enable the authority to expand at this site.</i></p>
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‘How many times has the school been oversubscribed in the last 5 years?’ (Resident)	Oversubscription data for town centre Primary schools 2015-2019. The Table below shows 1 st preference refusals for the specified period.					
	Admission Year- 1 st Preference refusals	Sept-2015	Sept-2016	Sept-2017	Sept-2018	Sept-2019 as at 20/5/19
	Barker’s Lane CP	5	1	0	4	1
	All Town Centre Primary Schools	16	10	16	16	23

First of all we were disappointed by the reaction of the concern raised, the fact that falling pupil numbers at Acton Park would result in redundancy, was responded with the fact that the school would be unable to be expanded despite the fact that numbers were falling. This wasn't an answer to the question. In the table above, stating 1st preference refusal – We at Acton Park Primary could easily have taken the children in as we had the space for them.

In the Consultation document for the Barkers Lane expansion, numerous projection tables were produced.

*** Projected growth within town centre**

*The figures in the table below DO NOT include nursery children.

School Name	NOR at Jan 2014	NOR at Jan 2015	NOR at Jan 2016	NOR at Jan 2017	NOR at Jan 2018	Projected NOR at Jan 2019	Projected NOR at Jan 2020	Projected NOR at Jan 2021	Projected NOR at Jan 2022	Projected NOR at Jan 2023
Barker's Lane Community Primary	193	194	198	197	199	205	205	205	205	203
Acton Park Community Primary	399	398	388	395	391	397	390	385	380	374

The figures below show the current demand for places at the schools as at September 2018.

School * Pre Adjustment to Barker's Lane CP	Published Admission Number	No Reception Allocated Sept 2018	1 st Preference Refusals	Nearest Suitable School Refusals
Barker's Lane CP	30	30	4	0
Acton Park CP	60	61*	5	1

The projections for numbers at Acton Park Primary School continue to decline, so do the actual numbers, yet the claim is a 'new' school is needed to due demand. Once again, Acton Park Primary School has the capacity.

Furthermore, we can't help but notice that the building work to expand Barker's Lane has yet to begin. Yet the buildings at Acton Park Primary School, in terms of space and capacity for its standard number of 60, is in fact fit for purpose. What is being done to promote this and why aren't the Local Authority helping us?

***Impact.**

Having raised the objection and concern in the Barker's Lane consultation, that the impact could be a shortfall in numbers and teacher's facing redundancy, actually came to fruition. Since the financial year of 2018 – 2019, the school has been operating in a licensed financial deficit. The deficits have increased and controlling it has become more difficult. In February of this year we proposed to reduce the numbers of classes by one, thus needing to reduce the staffing levels, teachers, by one. The COVID-19 Pandemic has meant that this proposal has been partially withdrawn, however the possibility of a redundancy in the near future exists and for September 2020 we will operate with one less class in our Nursery / Reception. Operating in a deficit budget not only impacts the staff, but also impacts the children of our school. We are working very hard to boost numbers and in turn increase our budget for appropriate and impactful expenditure. We can see an explicit link between the October 2018 [adopted] proposal to enlarge BLCPS by 50% and the February 2020 proposal to dismiss a teacher, 0.7 miles up the road.

Once again we ask: Where is the actual demand for places?

2. Relocation of St Mary's RC School.

Whilst reading material from the local media, we at Acton Park Primary School cannot make any comment regarding the current facilities that the school has or lacks at this present time. We have no objection to the fact that the school may need better facilities for their pupils in the future. However we do oppose to the location of where the school is proposed to go, namely the Nine Acre. This is merely 0.8 miles away from Acton Park Primary School, yet we have the space and facilities to cope with the demand for extra places.

***Location within the Rhosnesni Cluster.**

Within one square mile of the Nine Acre you will find that all the schools (Seven) in the Rhosnesni Cluster are located. Unlike many other clusters in Wrexham, the schools are very close together. You could also count a few other schools which aren't considered to be in the cluster that are also within a square mile of the Nine acre. With the proposal to add a 'new' Welsh-medium primary school to the area, we could see anything from 9 to 11 primary schools within close proximity of each other.

Once again we ask: Where is the actual demand for places?

***Admissions.**

Due to the current location of St Mary's, we seek clarification and support from the LA regarding admissions to the school and what impact this will have on the school surrounding the nine acre.

3. Other considerations.

***Groves site.**

Local media is awash with the proposal for Wrexham FC to use the Groves site, yet many residents of Wrexham are questioning why isn't this site being considered for education purposes? In the planning document it states that this location hasn't been considered. Why is this?

5.1 The application site has been selected as the most suitable site for the new school for the following reasons:

- Wrexham CBC have previously reviewed sites within the Town centre for a primary school but with the exception of the Groves site, no other sites were available or suitable.

The Groves site has struck a chord with many local residents over the last few years, and has featured in the local and national news on several occasions over the last few years. We at Acton Park Primary School are in no position to comment on the state of the building and its suitability for a modern, futuristic school and the cost to bring it up to a certain standard. However does the rest of the site have space for a school, playing field, parking spaces and other facilities needed for a modern primary school? Having previously been a secondary school, some access points still exist.

***Timing of this consultation.**

Whilst the original time for this consultation was initially around during the start of the Covid-19 national lockdown, then quite rightly suspended, we can't help feel slightly aggrieved at the timing of when this consultation has reopened. Whilst we do consider around four weeks to be ample time to respond to the consultation we feel that the timing of it is slightly unfair. We may be told, when is a good time? But Acton Park Primary School, like all schools in Wrexham and in Wales, has continuously been opened for key worker children all through the lockdown of this pandemic. To be precise the school remained open from February 24th, until July 17th. Like all schools, we complied with local and national requirements to re-open for the last three weeks of term. This consultation re-opened on July 20th, literally the first day of the school holidays and the first time the school has been closed since February 24th. Was this done on purpose so that potentially no response comes from local schools?

To reiterate, the Governing Body of Acton Park Primary School oppose to the building of a school on the Nine acre. We feel that our school is fit for purpose and can accommodate the 'local demand'. We would rather see support from the Local Authority in trying to increase our numbers on roll and invest in our school further, namely to better support traffic congestion on Box Lane (Which has been brought up by the school and local residents on several occasions over the years).

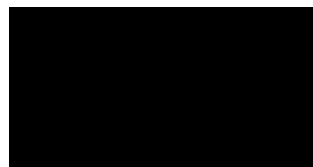
Thank you for your time in this matter. If you have any queries, or concerns, please do not hesitate to get in contact and we will be happy to help.

Yours sincerely,

The Governing Body of Acton Park Primary School.

Consultation on:
New Primary School on Nine Acre

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY



Dydd Mawrth yr 11^{eg} o Awst 2020.

**Ynglŷn: NASUWT Cymru Collective Response to the proposal to build a
New Primary School on Nine Acre.**

Annwyl ,

The NASUWT is the largest Union in the United Kingdom¹, in Wales (NASUWT Cymru)², in North Wales³ and in Wrexham County Borough⁴, **representing only those who teach or instruct.**

NASUWT Cymru writes regarding Wrexham County Borough Council's proposal to build a new primary school at the Nine Acre Site on Chester Road. We extend a vote of thanks for allowing NASUWT Cymru to submit an official Collective Response, on behalf of our 696 Wrexham Association Members.

¹ Where we have 280,086 Members.

² Where we represent 43.2% of all teachers.

³ Where we have 3,012 members.

⁴ Where we have 696 Members.

•Consultation and Transparency

NASUWT Cymru can point to both positives and negatives in relation to this Consultation Process. A positive is clearly the timescales allowed for consultation. Wrexham Local Authority usually demonstrates excellent practice in relation to consultation timescales. This process is no exception: in commencing on Wednesday the 20th of July and concluding on the 16th of August, Wrexham Local Authority have definitely allowed, ***"Reasonable time for meaningful consultation"***.

Wrexham Local Authority usually adheres to excellent practice in most of its consultations by: writing their own consultation documentation and supporting literature in-house as opposed to commissioning a costly private provider to do it for them; secondly by emailing out the consultation documentation and supporting literature to the 5 WTJNC⁵ and 3 WJNC⁶ constituent union Secretaries (so that they are aware a consultation is taking place in the first place); and thirdly by producing well-written, accessible documentation and supporting literature that provides a stakeholder with ample information with which to be able to respond appropriately.

Unfortunately, NASUWT Cymru holds that - on this occasion - these three things (which have marked all previous Consultation Processes) have been absent with this consultation on Nine Acre.

Communication

NASUWT Cymru learned that this consultation on Nine Acre was taking place – not from Wrexham Local Authority – from a concerned NASUWT Member who teaches at a school less than a mile away from Nine Acres and who was worried that a new 360 pupil school (when added to the 50% increase to neighbouring Barker's Lane C.P., which commenced in September) - might affect job security of teachers at their school. It was embarrassing that Wrexham Association NASUWT found out about the consultation this way. To Wrexham Local Authority's credit, this has never happened in the past but now that it has happened, NASUWT Cymru does not want to see this ever repeated.

To give Wrexham Local Authority further credit, the moment NASUWT Cymru contacted them about this, they immediately emailed all of the documentation associated with this consultation, not just to the NASUWT, but to all 5 WTJNC constituent union Secretaries. They explained that this information had not been sent out because this,

⁵ ASCL, NAHT, NASUWT, NEU and UCAC.

⁶ GMB, UNISON and Unite.

"Current consultation is not a statutory consultation under the School Organisation Code. The consultation is in fact a Pre Planning Consultation".

This was a legitimate answer, which satisfied NASUWT Cymru. However, the Union takes an active interest in any consultation or proposal which will affect – or may affect – the job security, pay, terms and conditions of service of any of our 696 Wrexham Association Members. We would argue that it constitutes good practice to engage unions in a dialogue at the earliest possible juncture of a Consultation Process.

With the above in mind NASUWT Cymru respectfully requests that we are consulted upon on any similar future proposal.

Commissioning Private Sector Providers?

NASUWT Cymru is used to the format of Wrexham Local Authority Consultation Processes. The documentation is always well written and informative. It was with surprise that the Union greeted a glossy consultation document, with a new layout. It appears that **Cadnant Planning** have been commissioned by Wrexham to write a glossy consultation document, with **Lawray Architects** also providing multiple, highly detailed diagrams⁷.

NASUWT Cymru respectfully requests to know how much money has been spent commissioning these private sector providers to do this work for the Local Authority? Is it the norm for private sector providers such as this to be hired in at such an early ("**Pre Planning**") stage, before a decision has even been taken on whether or not to proceed with a proposal? A stakeholder might be forgiven for assuming that this matter may be a foregone conclusion and not a genuine consultation process at all.

Furthermore, if the consultation is genuine and it is decided not to go ahead, a stakeholder may feel anger at the amount of public money that has been spent on private providers in what was only a preliminary phase in proceedings.

Finally, on this matter, will it become the norm – in future consultations – for a private provider to be commissioned to pen all of the consultation literature? NASUWT Cymru would not support such a move or such a use of public money⁸.

⁷ The involvement of **Lawray Architects** is understandable if a new building has to be built from scratch (although a stakeholder may question the extent of their involvement at this early consultatory stage in proceedings). It was the involvement of **Cadnant Planning** which surprised NASUWT Cymru the most as these consultation documents are usually written – and written well – by the Local Authority, in-house.

⁸ To give the Local Authority credit, a few NASUWT Cymru Members have drawn our attention to how they felt that this **Cadnant Planning** consultation document was not as well written as the consultation documents the Local Authority publishes in-house. Examples they cited were that - presumably in error - **Cadnant's** document contains two Section 5.1 (the first after Section 4.9 and the second - bizarrely - after Section 5.4); and how the page numbers begin with 1 after 4 pages in.

Transparency

NASUWT Cymru is under the impression that this ***Cadnant Planning*** consultation document does not give a stakeholder the full and complete picture of what is going on here.

The consultation document speaks of a, ***"New"***, 360 pupil capacity primary school, no less than three times:

"315 place new primary school and 45 place nursery."

(Section 1.3, Page 1; Section 3.1, Page 5; Section 3.2, Page 5; Section 3.6. Page 6).

This is not limited to ***Cadnant Planning's*** literature, indeed on Wrexham Council website's ***Your Voice*** webpage, it states:

"Why are we doing this?:

Proposal to build a new primary school on land off Chester Road Wrexham . . . This consultation is an opportunity to learn about the proposals for a new primary school for your area".

Your Voice Wrexham (webpage)

"A new primary school", is mentioned 3 times on this Council webpage. NASUWT Cymru is under the impression that the Nine Acres school - ***if it goes ahead*** - may not be a new primary school but rather a relocation of the existing school, St. Mary's Catholic Primary School (SMCPS). Why is the Union under this impression? Initially because of reports in the local media. Particularly the 2/9/19 Wrexham.com piece, ***"Nine Acres Again!!!"*** and the article in [The Leader](#), ***"Plans to put primary school on Nine Acre field in Wrexham would cause 'nightmare' for neighbours"***, from 10/3/20. The latter of these two pieces declares:

"St Mary's Catholic Primary School, which is currently based on Lea Road in the town centre, recently announced it would be relocating to the site."

The Union was not sure if this was true – NASUWT does not believe everything in the papers – neither the ***Cadnant Planning*** consultation document or Wrexham Council's ***Your Voice***, contain any mention of SMCPS (instead repeatedly referring to a, ***"New primary school"***)?

When NASUWT enquired about this consultation, Access and School Places Manager, Ms Paula Parry issued the following statement:

"The consultation is in fact a Pre Planning Consultation with reference to relocating St Mary's RC to the 9 Acre site into a new building. The school will remain RC and therefore its own criteria for admission as published."

Does this confirm that the local media – and not the ***Cadnant Planning*** consultation document (or Wrexham Council's ***Your Voice*** page) – was correct?

Complications

This apparent lack of transparency complicates this matter: should a respondent, acknowledge that this consultation process is all about the [proposed?] relocation of SMCPs and respond accordingly⁹; or should a respondent discount what is now declared to be true and acknowledge the SMCPs dimension in their response?

This may further add to the feelings of some stakeholders that this is a done deal. Is it feasible that the outlined *Cadnant Planning* proposal would be successful but then a future/second consultation on whether or not SMCPs should be relocated, is not adopted? What then? Would Nine Acre then become an all new school but not SMCPs? Would the Council not have commenced building work unless such a second consultation had both taken place and been adopted?

This is very important in determining whether or not NASUWT Cymru supports, or opposes¹⁰ this proposal.

Recent Wrexham Primary School Planning

NASUWT Cymru holds that recent (between 2017 and the present) Wrexham planning for primary school places has had a disastrous impact on the livelihoods of NASUWT Members.

To demonstrate this, we shall focus on 4 examples:

•New Welsh Medium Primary School

On the 27th of September 2017, the Local Authority proposed opening a New Welsh Medium Primary School (initially on the Ysgol Hafod Y Wern site and then permanently on the Borrass Park C.P. site) due to, ***"Rising demand"***, for Welsh Medium primary places.

When NASUWT Cymru drew attention to the fact that the Local Authority's own arithmetic pointed to the contrary, Wrexham Council attacked NASUWT Cymru's position in the media (<https://www.bbc.co.uk/news/uk-wales-north-east-wales-43225509>).

⁹ For NASUWT Cymru, it is always important to primarily respond to what is actually being formally proposed and not to speculate. The manner in which this process has been managed makes that extremely difficult to do (without knowing whether or not a second phase consultation – about SMCPs – will be granted).

¹⁰ We would take this opposition through to one of a formal Objection to the process, as soon as this option becomes available.

Table I – Projected Wrexham demand for Welsh Medium Primary School Places 2016–2021

Welsh Medium Primary School	2016 ¹¹ Projection for 2021	2018 Projection for 2021	2016–2018 Difference
Bodhyfryd	368	357	–11
Bro Alun	210	210	–
Bryn Tabor	279	265	–14
Hooson	304	286	–18
Min Y Ddol	98	105	+7
Plas Coch	321	286	–35
TOTAL	1,580	1,509	–71

Low and behold, as the time for this new school to open drew nearer, it was suddenly announced that it would not open because there had been no demand to justify it opening (<http://www.wrexham.com/news/plans-to-create-new-210-place-welsh-medium-primary-school-postponed-166220.html>). NASUWT Cymru has asked since, how much money was diverted into this aborted project, from the overall School Budget? As the school was set to open in less than 5 months after the decision was taken to abort, how far along was the process? Had any refurbishment or rebuilding work taken place, or been commissioned at either the dormant sections of Ysgol Hafod y Wern or Borrass Park C.P. (or at both)? Had a Headteacher; Deputy Headteacher; Teachers; Teaching Assistants; Secretary; Caretaker; Cleaner; Dinner Lady; Receptionist been appointed? Between the start of this consultation in September 2017 and the decision to postpone in April 2019, waves of Wrexham-based NASUWT Cymru Members **were** made redundant (16 to be precise – with a further 9 less than 5 months later¹²). Could the monies diverted into this abortive pet project have not been better spent protecting the jobs of these 25 teachers?

•Acton Park C.P. and Barker's Lane C.P.

Between October and November 2018 Wrexham Council proposed increasing the capacity of Barker's Lane Community Primary School (BLCPS) by 50% (from 210 pupils to 315 pupils). Acton Park Community Primary School (APCPS) is situated only 0.7 miles away from BLCPS.

¹¹ Source: *Proposal to Increase Pupil Capacity at Ysgol Plas Coch*, and *School Organisation Strategy 2017-25* (both used – both of which were published in 2016). For 2018 data the literature for this consultation (*Proposal to Increase the Capacity at Barker's Lane CP, Wrexham*) was used.

¹² 2018: Darland High School (1 FTE); Gwersyllt C.P. (2 FTE); Wrexham Music Service (8 peripatetic); Ysgol Bryn Alyn (1 PTE); Ysgol Clywedog (2 FTE); Ysgol Rhiwabon (3 – one of the 3 was a forced fractionalisation of contract by approximately 40%). 2019: Bronington V.A. (2 PTE); Ceiriog Valley Federation (3 – thankfully all 3 were successfully redeployed to other Wrexham schools); Gwersyllt C.P. (1 FTE); Ysgol Bryn Alyn (1 FTE); Ysgol Penrhyn (1 FTE); Ysgol Rhiwabon (1 FTE). This accounts for not all teacher redundancies in 2018 and 2019: NASUWT Cymru is not the only union representing teachers in Wrexham and many other teachers, represented by other unions, were also made redundant over this period.

NASUWT Cymru is under the impression that – in 2018 – only **ONE** child had been turned away from BLCPS due to numbers On Roll/oversubscription. Less than a year ago, on the 12th of March 2019 Wrexham Council ratified this decision to increase capacity at BLCPS. This decision to expand BLCPS in relation to APCPS – was challenged, around one year ago, by both Cllr. G. Lowe and Cllr. D. Wallice in an article on Page 11 of *The Leader* on the 27th of March 2019.

NASUWT Cymru – in our 26th November 2018 official Collective Response – did not oppose the expansion: there was then (and still is now) a very genuine need to increase the number of English Medium Town Centre primary school places. However, we did question whether or not BLCPS was an appropriate, **"Town Centre"** candidate school for expansion, pointing out that there was a large number of schools nearer to the Town Centre than BLCPS (which it situated to the north of Wrexham):

Table II – Is Barker's Lane C.P. a Town Centre School?

SCHOOL	DISTANCE FROM THE TOWN CENTRE
SAINT GILES	140 Yards
SAINT MARY'S	0.2 Miles (1 minute)
VICTORIA	0.6 Miles (3 minutes)
ALEXANDRA	0.8 Miles (4 minutes)
BODHYFRYD	0.8 Miles (4 minutes)
GWENFRO	1.2 Miles (6 minutes)
SAINT ANNE'S	1.3 Miles (5 minutes)
PLAS COCH	1.5 Miles (5 minutes)
HAFOD Y WERN	1.6 Miles (8 minutes)
RHOSDDU	1.6 Miles (7 minutes)
RHOSTYLLLEN	1.8 Miles (5 minutes)
ACTON PARK	1.9 Miles (8 minutes)
BORRAS PARK	2.2 Miles (9 minutes)
DEINIOL	2.2 Miles (6 minutes)
PENRHYN	2.2 Miles (6 minutes)
WAT'S DYKE	2.2 Miles (9 minutes)
BARKER'S LANE	2.6 Miles (9 minutes)

NASUWT Cymru was also conscious that only 6 of Wrexham's 58 primary schools were projected to have a Budget Deficit at the time the BLCPS expansion proposal was made and that - of these 6 – APCPS had the largest projected Budget Deficit, at **-£39,490.00**.

NASUWT Cymru also pointed out the proximity to APCPS. and our Members' anxieties there, that an expansion at BLCPS could lead to redundancies at

APCPS This was why – on Page 9 of our 26th November Collective Response – we stated:

“The NASUWT is seeking assurances from the Local Authority that this proposal will not directly, or indirectly, trigger Compulsory Redundancies of Acton Park-based NASUWT Members.”

NASUWT Cymru did not even receive a reply, let alone the assurances we were seeking. Even the published post consultation report did not appear to reflect any of the concerns that NASUWT Cymru had raised on behalf of our APCPS-based Members.

At 17:03 on Monday the 2nd of March 2020, APCPS officially unveiled a proposal to dismiss 3 teachers after August 31st. The principle reason given for this decision was found on the second page of the **Business Case Proposal**:

“At the end of the academic year we will be losing 56 Year 6 pupils and information gathered on 24.2.20 from Prime (the school application database) indicates that we only have 31 applications for Nursery (Prime also indicates that we will also lose 3 children in Reception). This would be a total of 359 full-time children and 31 part-time pupils. This fall in pupil numbers would no longer justify 15 mainstream classes, which could also not be sustained by the severe reduction in the budget.”

The COVID-19 Pandemic (and other factors) meant that this proposal was partially withdrawn for 2 of the 3 posts described¹³. However, one non-NASUWT teacher will still lose their livelihood at the end of this month.

NASUWT sees an explicit link between the October 2018 [adopted] proposal to enlarge BLCPS by 50% and the March 2020 APCPS proposal to dismiss 3 teachers, 0.7 miles up the road.

•Gwersyllt C.P. and Ysgol Bro Alun

NASUWT would argue that a third example of Wrexham Local Authority’s planning for primary school places being harmful to NASUWT members, can be found in the village of Gwersyllt. Specifically, on the lower side of the A541 road¹⁴ which cuts through the middle of the village.

In February of 2018 Gwersyllt Community Primary School proposed two full-time teachers redundant, a couple of months later 3 NASUWT members at the school had been in a Compulsory Redundancy pool, with the two who had

¹³ The proposal was to make a redundancy of a permanent contract teacher – which has ceased due to the Pandemic – although, with all likelihood (and with a £129,281.00 Projected Budget Deficit, which may increase between now and 2021, and the falling pupil numbers described not going away), this process will begin anew in 2021.

¹⁴ There are 4 schools in Gwersyllt: 2 on the upper bank of the A541 (Ysgol Heulfan and Ysgol Bryn Alyn, which are both English Medium and are not relevant here) and Ysgol Bro Alun (Welsh Medium) and Gwersyllt Community Primary School (English Medium), on the lower bank of the A541.

been initially selected remaining in it after the final appeal had been exhausted. The official reason for the sacking of these teachers was given as:

"Falling roll (reduction in pupil numbers)...The numbers of pupils entering the school in Nursery have been reducing for the last 4 years. The current expected intake is 30, compared to a maximum potential class sizes of 45."

2018 Gwersyllt Community Primary School **Section 188 Notice** (2nd February 2018)

This led to NASUWT Cymru declaring a Dispute with the Local Authority over Gwersyllt C.P. in 2018.

NASUWT Cymru took 4 days of Strike Action at Gwersyllt C.P. between July and September last year, with a fifth and sixth day of Strike Action proposed but later withdrawn (<https://www.leaderlive.co.uk/news/16883308.teachers-to-strike-again-in-gwersyllt-as-dispute-with-primary-school-escalates/>). The Dispute was brought to a close in October when the Chair of Governors who had presided over the redundancy process and who had shown overt prejudice to NASUWT members resigned (before the fifth and sixth days of Strike Action were set to take place), only to request – a couple of days later – that he be reinstated. This request appeared to be rejected by all stakeholders and so he was not reinstated.

In October, while NASUWT Cymru's Dispute was still in force – with the fifth and sixth day of Strike Action proposed for later in October – the Local Authority proposed to increase by 50% the capacity at Ysgol Bro Alun, **a neighbouring primary school 0.8 miles away in the same village.**

Teachers at Gwersyllt Community Primary School were left extremely frustrated that their employer could propose multiple colleagues redundant - on grounds of ***"Falling roll (reduction in pupil numbers)"*** - from September 1st 2018, only to propose to increase the pupil capacity by 50% at a neighbouring primary school 0.8 miles away from 1st September this year (although 3rd October was when this consultation was launched, the employer having made the decision, to propose this, earlier still).

In February of 2019 **a second, consecutive redundancy process was launched at Gwersyllt C.P.**, approximately 6 months before the 50% increase in capacity at Bro Alun was set to commence (the day the third – in less than 13 months – Gwersyllt C.P. redundancy would take effect would be the same day the 50% Bro Alun capacity would begin to take effect). Again, the 2019 **Section 188 Notice** (like the 2018 one) stated that:

"The numbers of pupils entering the school in Nursery have been reducing for the last few years. The current expected intake is 23, compared to a maximum potential class size of 45."

And again, a third full-time NASUWT Member teacher at Gwersyllt C.P. was duly made redundant.

It could be offered that due to Gwersyllt C.P. being English Medium and Ysgol Bro Alun being Welsh Medium proceedings are complicated: in lower-bank Gwersyllt demand for Welsh Medium education might be growing, while demand for English Medium in the same half of the village is declining. However, the table we have included below – which cites two Wrexham documents – illustrates that the, ***“The numbers of pupils entering the school in Nursery have been reducing for the last few years”***, cited in 2018 and again in 2019 may have been a politically engineered decision, whereby children who - in February of last year - were expected to go to Gwersyllt C.P., were - by October - now expected to go to Ysgol Bro Alun. After all, there are only so many children in lower bank Gwersyllt and all of them should have been identified in 2018 PLASC Data. As repeatedly stated, NASUWT Cymru is broadly supportive of an expansion of Welsh Medium provision but any stakeholder in Wrexham could be forgiven for thinking that Wrexham’s approach to this is to deliberately engineer the ***‘scaling down’*** of English Medium schools, in close proximity to – or in federation with – Welsh Medium schools, with the inevitable job losses and redundancies which follow:

Below is a table quoting 2018 projected Gwersyllt C.P. numbers from the ***Business Case for Change*** which accompanied Gwersyllt C.P.’s ***Section 188 Notice*** alongside Gwersyllt C. P.’s 2018 projected numbers in the ***Proposal to increase pupil capacity at Ysgol Bro Alun*** consultation document of 3rd October 2018:

Table III – Is Ysgol Bro Alun to take pupils who would have attended Gwersyllt C.P.?

Wrexham Document	2019	2020	2021	Diff.
<i>Gwersyllt C. P. Business Case For Change</i> ¹⁵ (2/2/18)	274	265	253	N/A.
<i>Proposal to Increase pupil Capacity at Ysgol Bro Alun</i> (3/10/18)	242	233	220	–97

With this knowledge it easy to see why teachers at Gwersyllt C.P. – especially the 3 NASUWT Cymru Members whose posts were deleted – were so angry and frustrated.

•Ceiriog Valley Federation

¹⁵ It is worth noting that we are using the conservative estimate Table 1 (Page 4 of the *Business Case For Change*, showing 274, 265 and 253). Table 2 (official projections) showed 289, 295 and 298 for the same period. However, Table 3 on Page 5 (optimistic projections) gave 289, 360 and 360 for the period 2019-2021. Although over that 3-year period – whilst Bro Alun would have a total of 135 places – it would have 45 *extra* places, over that time, if this proposal was adopted. Presumably both documents would be derived from 2018 PLASC Data and not plucked out of thin air?

Ceiriog Valley Federation – up until 31 August – was composed of 3 sites: a Bilingual Site (Cynddelw); an English Medium Site (Pontfadog); and a Welsh Medium Site (Llanarmon).

The position of multiple stakeholders was the employer had implemented planning that saw the English Medium provision at the federation being deliberately undermined.

On March 30th 2016 the Bilingual (Cynddelw) Site published a **Section 188 Notice** which proposed staff who were not, **"First Language Welsh"** redundant. This was not a typo as it was repeated several times. NASUWT viewed this as inequitable because the Cynddelw Site was historically an English Medium School, only nominally being Bilingual, having previously been Glynceirog Community Primary School prior to being federated. Also implicit in this **Section 188 Notice** was that staff who were first language English but who had learned Welsh, could still be made redundant. Our inference was that this was therefore more about ethno-linguistic background than it was about a colleague's proficiency in the Welsh Language.

After 31st August 2016, two members of non-first language Welsh staff were made redundant as a result of this **Section 188 Notice**.

In the autumn of 2016, the first of three Consultations to convert the federation's Bilingual Site into an exclusively Welsh Medium Site was launched. The Governing Body ruled in favour of conversion. However, the Local Authority correctly instructed the school that there would have to be a more formal consultation process which consulted with all stakeholders (this having not been the case in 2016).

On the 9th of January 2017 the Local Authority launched the second consultation on conversion from **de jure** English Medium, **de facto** Bilingual, to being exclusively Welsh Medium. This consultation document was strewn with errors. Perhaps the most striking of which was repeated reference to how English-speaking families with children currently at the Cynddelw Site could access English Medium education at the federation's Llanarmon Site - the Llanarmon Site being (pre-federation, and still is) one of the oldest Welsh Medium schools in the county.

This proposal was abandoned in the face of massive opposition from a multitude of stakeholders. Whereupon there was an abatement of several months.

The third – and, to date – final consultation was a tertiary incarnation of the first two (also launched in 2017) but with an added option of keeping the English Stream at the Bilingual Site but abolishing the federation's only exclusively English Medium (Pontfadog) Site. Ultimately, it was this proposal

which was adopted - despite renewed massive opposition from the local community and other stakeholders.

NASUWT represented more teachers in the federation's English provision (including both the English Medium Site and the Bilingual Site's English Stream) than all of the other teaching unions combined and so we were actively involved in the process from the beginning.

NASUWT – and other stakeholders – commented on how actions were taken to **'Pave the way'** for the closure of one of the federation's two English Medium Provisions in a community whose demographic make-up did not appear to compliment such an action:

Table IV – Engineered downsizing of English Medium Provision at Ceiriog Valley Federation?

WHAT	WHEN	NOTES
Wraparound Childcare is abolished at the English Medium (Pontfadog) Site	5-6 years ago	Led to many Anglophone Ceiriog Valley-based families choosing Cynnddelw, or non-Ceiriog Valley Federation schools
Bilingual Toddler/Nursery Group abolished – monolingual Aberystwyth-based <i>Mudiad Meithrin</i> takes over provision	5-6 years ago	Along with the above, meant that all youngsters were – by default – 'Streamed' into the Welsh Stream from the <i>Cylch Ti a Fi</i> .
Bilingual (Cynnddelw) Site <i>Section 188 Notice</i> sets out to make some employees who are not, "Welsh First Language", redundant	March 2016	Possible potential ethno-linguistic discrimination, as someone who learned total fluency in Welsh could still be sacked as they would not be First Language
First Dismissals of Bilingual (Cynnddelw) Site Anglophone staff	After 31/8/16	Two Anglophone members of Cynnddelw Site staff dismissed off the back of the 2016 <i>Section 188 Notice</i>
First Bilingual (Cynnddelw) Site attempt to abolish English Stream	2016-17	Rejected by a plurality of stakeholders
Barriers to prevent parents from moving their children from the Welsh Stream to the English Stream	Ongoing	NASUWT has spoken to multiple parents who have testified to this (some in writing)
Parents of young children	Ongoing	NASUWT has spoken to

told that they cannot have English Stream for their children as it won't run in a particular year group		multiple parents who have testified to this (some in writing)
Second Cynddelw Site attempt to abolish English Stream	2017	Or close the only exclusively English Medium Pontfadog Site (which was what was decided)
<i>Siarter Iaith</i> extra-curricular activities only accessible for Welsh Stream children	Ongoing	Although NASUWT is under the impression that bilingual application forms are now being made available for English speaking families
Final Decision to shut the federation's only exclusively English Medium site	2018	The ultimate trigger for the 2018 <i>Section 188 Notice</i> and the deletions of the posts of multiple NASUWT Members.
Closure of Ceiriog Valley Federation's only exclusively English Medium Site on August 31 st	2019	All of NASUWT's Members proposed Compulsory Redundancies were Redeployed to English Medium posts at other Wrexham Schools

It is important to reiterate here that NASUWT Cymru supports conversions of schools from English Medium to Welsh Medium, where it will not threaten the livelihood of our Members. However, this was not the case here. The federation's December 2018 *Section 188 Notice* selected multiple NASUWT Members for Compulsory Redundancy after 31st August 2019¹⁶.

The events described above led NASUWT to declare two formal Disputes against Wrexham Local Authority (one in 2018 and one in 2019). Whilst our Members at the federation returned a ballot result in favour of Strike Action in both the 2018 and the 2019 ballots, it was only in 2018 that our Ceiriog Valley Federation Members took a day of Strike Action (on 17th July 2018 in furtherance of this Dispute - See <https://www.leaderlive.co.uk/news/16361716.wrexham-parents-and-teachers-protest-over-school-closures-and-redundancies/#:~:text=TWO%20schools%20have%20joined%20forces,yester day%20over%20Wrexham%20Council's%20plans.>).

Regarding the 2019 Dispute, this second Dispute was resolved without the need for a further escalation when all of our Ceiriog Valley Federation English Medium Site Members were successfully redeployed to English Medium

¹⁶ Typically a *Section 188 Notice* only selects school staff in an 'At Risk' of redundancy category. However, as this document declared the abolition of the federation's English Medium Site - even at this early stage - the deletion of our Members' posts was a given.

teaching posts at other schools around Wrexham for 1st September of the current academic year:

NASUWT Members	Redundant From	Redeployed to
Member 1	C.V.F. English Medium Site	C.V.F. – Bilingual Site
Member 2	C.V.F. English Medium Site	Barker's Lane C.P.
Member 3	C.V.F. English Medium Site	Gwenfro C. P.

Difficulties

NASUWT Cymru acknowledges that – when planning for new schools (or increasing the capacity at existing sites) – Wrexham Local Authority has a difficult geography to plan around: Wrexham is not a rural authority, like Denbighshire or Gwynedd; or an urban authority like Cardiff or Swansea. This was acknowledged in Wrexham Local Authority's School Organisation Strategy 2017-25:

"In percentage terms, population growth in Wales is projected to be highest in Cardiff, Wrexham, Swansea and Newport. It should be recognised that in larger cities, such as Cardiff and Swansea, have the capacity to absorb rapid, unpredictable and substantial fluctuations in growth. The geography of Wrexham with its urban town centre and more rural outskirts makes this more challenging."

School Organisation Strategy 2017-25 (Section 2.2, Page 9).

NASUWT Cymru has noted the number of Wrexham School Redundancy Processes that have taken place in schools outside of the town and in more rural areas and villages:

***2018: Ysgol Sant Dunawd (Bangor-on-Dee), Ysgol Rhiwabon I (Ruabon), Darland High School (Rossett);**

***2019: Bronington V.A., St. Chad's (Hanmer), Ysgol Rhiwabon (II), St. Paul's (Bangor-on-Dee), Borderbrook (Talwrn Green), Ceiriog Valley Federation (Pontfadog);**

***2020 Holt C.P., Ysgol Rhiwabon (III);**

In contrast to this, colleagues in the Town Centre primary schools: Alexandra C.P.; St Giles V.C.; and Victoria C.P. report to us how full their schools are and how multiple first choice applications have to be turned away every year. The authority has had to manage a bizarre state of affairs, where the number of children in the rural, outlying regions of the county (Ceiriog Valley, Maelor Saesneg, and Dee Valley) are facing a steady demographic decline in pupil numbers, whilst at the same time, the young population in the Town Centre

has ballooned in recent years (as is testified by the reports from Alexandra C.P., St. Giles V.C., and Victoria C.P. cited above).

Interestingly primary schools in the north of the town have **not** reported to us that they are oversubscribed. For example – on the north side of the town – we have already made the link between the October 2018 proposal to increase the pupil capacity of Barker's Lane C.P. by 50% and the March 2020 Acton Park C.P. Redundancy Process, which will see one of our Members lose their livelihood this summer.

Nine Acre is also on the northern side of the town, being only 0.8 miles away from Acton Park C.P and 1.4 miles away from Barker's Lane.

Wat's Dyke C.P. - 1.1 miles away from Nine Acres - is also on this northern side of Wrexham town. Wat's Dyke C.P. has not had a Redundancy Process this year, like Acton Park C.P., but it has experienced a 33.3% drop in its normal Nursery intake¹⁷ this year. The Wat's Dyke (Acting) Headteacher has briefed staff at the school, stating that other schools in the Cluster are also in the same position for September. During this staff briefing, potential redundancies for next year were mentioned.

Ysgol Rhosddu is the closest primary school of all to Nine Acres. With the situations described above, at Acton Park C.P. and Wat's Dyke C.P., and taking Ysgol Rhosddu's proximity to Nine Acres into account, NASUWT Cymru has to ask: **are there enough pupils to go around the primary schools on Wrexham's north side?** The anecdotal evidence suggests not.

Going off the Consultation Document

If NASUWT Cymru is basing our response off the ***Cadnant Planning*** Consultation Document and accompanying literature alone, then we would oppose this proposal and would also formally Object to it, when that option becomes available. This would be on the grounds that pupil numbers in the north side of Wrexham do not justify this and that the proposal could lead to: further teacher redundancies at Acton Park C.P.; teacher redundancies at Wat's Dyke C.P.; Ysgol Rhosddu and even at Barker's Lane¹⁸.

NASUWT Cymru has taken a softer line in the past: whilst some of our consultation collective responses have asked forthright questions on behalf of our members potentially at risk of losing their livelihoods, we have never lodged a formal Objection to any of the proposals or consultations above and only in one of the above cases – Ceiriog Valley Federation on the 17th July 2018 – did we take Strike Action before the redundancies of our Members

¹⁷ From 45 down to 30.

¹⁸ Recent history has shown us that a school which increases pupil capacity, is not immune to a Redundancy Process: in Wrexham Local Authority's ***School Organisation Strategy 2017-25*** (published on the 12th of September 2016) the 2016 increase in pupil capacity at Ysgol I.D. Hooson by 55.2%, to add another 112 pupils places was explored. However, less than 17 months later (16:04 on the 20th of February 2018) Ysgol I.D. Hooson published a Redundancy Process due to a £40,000.00 projected Budget Deficit.

were formally proposed¹⁹. Yet these proposals, harmful to our Members' livelihoods, keep on coming and coming and perhaps NASUWT Cymru needs to begin taking a more robust line at an earlier stage in proceedings as our Members are simply not being listened to.

If we go off the Local Media and the Access and School Places Manager's second hand comment²⁰

If NASUWT Cymru ignores the fact that none of the *Cadnant Planning* consultation document, Wrexham Council *Your Voice* webpage and supporting literature makes a single mention of St. Mary's Catholic Primary School (SMCPS) and goes off the media reports, then the Union's view changes. Our view changes because SMCPS is one of Wrexham's 17 Faith Schools/sites.

Table V – Faith Schools in Wrexham County Borough

Faith School	Type	Denomination	Notes
All Saints	V.A.	Anglican	Located in the village of Gresford.
Borderbrook	V.C.	Anglican	Tallarn Green, no longer a school in its own right but a site of the Maelor Federation.
Bronington	V.A.	Anglican	
Eyton	V.C.	Anglican	
Madras	V.A.	Anglican	Located in the village of Penley.
Minera	V.A.	Anglican	
Pentre	V.C.	Anglican	No longer a school in its own right but a site of the Dee Valley Federation.
St. Anne's	V.A.	Roman Catholic	Located in Caia Park.
St. Chad's	V.A.	Anglican	Located in the village of Hanmer.
St. Giles	V.C.	Anglican	Located on Madeira Hill in Wrexham Town Centre.
St. Joseph's	V.A.	Dual Faith ²¹	The only secondary Faith School in Wrexham. Located on Sontley Road.
St. Mary's	V.A.	Anglican	Located in the village of Brymbo.
St. Mary's	V.A.	Roman Catholic	Located on Lea Road (in Wrexham Town Centre).
St. Mary's	V.A.	Anglican	Located in the village of Overton.
St. Mary's	V.A.	Anglican	Located in the village of Ruabon.
St. Paul's	V.A.	Anglican	Bangor-on-Dee, no longer a school in its own right but a site of Maelor Federation.
St. Peter's	V.C.	Anglican	Located in the village of Rossett.

Not only is SMCPS a Faith School, it is a Voluntary Aided Faith School.

¹⁹ The 3rd of December 2018, at 10:48, in this particular instance.

²⁰ The Access and School Places Manager did not contact us directly regarding the quotation cited above, it was included in an email from Human Resources.

²¹ Originally Roman Catholic but now both Anglican and Roman Catholic.

Table VI – Differences between types of Faith School

Type Of Faith School	Provides Faith based education	Allowed to write own Admissions Policy	Follows L.A. inclusive Admissions Policy
Voluntary Aided	✓	✓	✗
Voluntary Controlled	✓	✗	✓

With a Voluntary Aided Faith School, it does not really matter at all where in the authority it is situated. A Voluntary Aided Faith School – in writing their own admissions policy – could have no pupils at all from its locality, such a school is perfectly entitled to turn applicants away, if they do not meet the requirements of its admissions policy (presumably, in this instance, being baptised into the Roman Catholic faith). Such a school could be in north Wrexham but have no pupils from north Wrexham - the Local Authority is committed to subsidising transport to families of faith, to the nearest faith school of their denomination. As there are only 2 Roman Catholic primary schools in Wrexham and they are 1.2 miles apart (1.5 miles away if SMCPs is relocated to Nine Acres), we can safely assume that a Nine Acres Voluntary Aided Roman Catholic primary school would be the school of choice - and entitlement - for approximately half of the Roman Catholic families in the whole of Wrexham County Borough.

This would massively reduce the chance that the, **"New"**, Nine Acre school would potentially pose a threat to the livelihoods of our Members teaching at schools with recently declining intakes of pupils, or right on the doorstep of Nine Acre (or both). However, it would arguably make a mockery of **Cadnant Planning's** twice repeated claim that:

"The proposals envisage the development of community-based focus for every school in the area. 21st Century Schools need to provide services that draw both the community and schools together, promoting lifelong education for adults, before and after school clubs, access to wider services and other community-based activities."

(Section 3.4, Page 5; Section 6.9, Page 22).

It could be debated that the Roman Catholic school sector in Wrexham is suffering the same falling pupil numbers as some of Wrexham County Borough's rural schools (or Wrexham's north schools).

Exactly two years ago, SMCPs underwent a formal Redundancy Process, in which teaching assistants/support staff – but no teachers – were proposed redundant after the 31st of August 2018.

The only other Wrexham Roman Catholic primary school St. Anne's Catholic Primary School (SACPS), less than a year ago²², published a **Business Plan**, declaring that it would be downsizing the school's Senior Leader Team. In this **Business Plan** the school stated:

"In 2015, due to budget cuts the Governing body was forced to make redundancies and 7 teaching assistants were made redundant. 1 of the Assistant Heads also had working hours reduced to 0.6 hours."

The school went on to say:

"Each year, the Budget is reduced considerably and the governing body have recently been unable to replace 2 teaching assistants currently on maternity leave have also been unable to extend any temporary contracts. Also pupil numbers have decreased considerably over the years from 209 pupils in 2014 to 185 (current figure)."

To an outsider, looking at the Roman Catholic primary school sector in Wrexham, it looks as though this is not a sector experiencing growth.

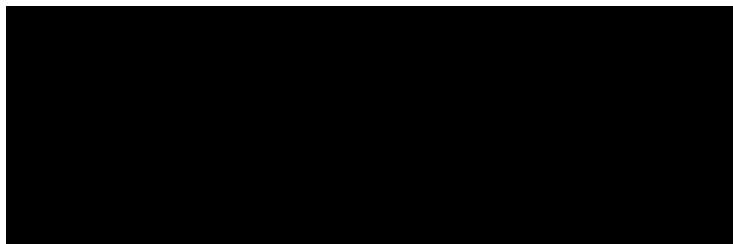
However, it is here where the respondent to this consultation process is left to speculate: as the **Cadnant Planning** documentation, the supporting literature and Wrexham Council's **Your Voice** webpage make no mention of either relocation or SMCPs. Stakeholders have no idea why a relocation might be being proposed. The respondent is left to speculate further: maybe the Nine Acre school site will be smaller (not larger) than SMCPs's current Lea Road site; maybe the building at the Lea Road site is in a decrepit state and the proposed move is health and safety orientated; maybe WCBC has other plans for the Lea Road site, with its prized central positioning making it prime real estate.

As this is speculative - and none of NASUWT Cymru's Members from either SMCPs or SACPS have offered any concerns about a future relocation of SMCPs away from Lea Road - NASUWT Cymru would neither oppose or object to this proposal.

Thank you for your time in this matter, it is appreciated. If you have any queries, or concerns, please do not hesitate to contact me. I will be happy to help.

Yours sincerely,

²² 15:19, on the 8th of May.



Aelod o Bwyllgor Gwaith NASUWT ar ran Gogledd Cymru
NASUWT National Executive Member for North Wales



CC:

NASUWT's Elected Wrexham Association Executive

Ms Karen Evans, Director of Education and Early Intervention

Acton Park Community Primary School–based NASUWT members

Wat's Dyke Community Primary School–based NASUWT members

Ysgol Rhosddu–based NASUWT members

APPENDIX C
LETTERS SENT TO COMMUNITY CONSULTEES, EXAMPLE

Pennaeth Tai a'r Economi/Head of Housing and Economy
Stephen Bayley

Adran Tai a'r Economi, Ffordd Rhuthun, Wrexham. LL13 7TU
Housing and Economy Department, Ruthin Road, Wrexham. LL13 7TU
www.wrexham.gov.uk www.wrexham.gov.uk



[REDACTED] - CLERK
ACTON COMMUNITY COUNCIL

Ein Cyf/Our Ref Nine Acre Consultation
Dyddiad/Date 20th July 2020

Dear Sir/Madam,

**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT
PROCEDURE) (WALES) (AMENDMENT) ORDER 2016.**

**PRE-APPLICATION CONSULTATION FOR NEW PRIMARY SCHOOL, NINE ACRE,
WESTMINSTER DRIVE, WREXHAM.**

Grid Ref: E 333760 N 351271

As part of our pre application consultation process that applies to all planning applications for "major" developments and applications for developments of national significance I believe you may have comments that you may wish the Authority to consider before a formal Planning Application is submitted for future approval. If you believe the pre application consultation cannot be determined without details of this matter you must let me know as a matter of extreme urgency so that I can provide them to you.

The relevant documents prepared can be viewed at www.yourvoicewrexham.net

Paper copies of the information will be provided on written request either via postal request to, The Byre, Croesnewydd Hall, Wrexham, LL13 7YP, or via email to wrexham@lawray.co.uk. The drawings will be provided in A3 size. Please request paper copies if required within 14 days of receipt of this notice, to ensure they can be provided within the 28-day consultation period.

We will be using the internet to gather people's views using the email nineacreconsultation@wrexham.gov.uk. Or alternatively please send correspondence to, Housing and Economy Department, Ruthin Road, Wrexham, LL13 7TU, for the attention of Nine Acre Consultation.

Please can you ensure that any comments etc. you do wish to make are received by the 16th August 2020. If you have previously replied to the consultation that was ceased due to Covid-19 restrictions, your views will be carried forward to this consultation.

Yours Faithfully,

[REDACTED]

[REDACTED]

Lawray Architects on behalf of Wrexham County Borough Council

Rydym yn croesawu goheblaeth yn Gymraeg.
Byddwn yn ymateb i unrhyw oheblaeth yn Gymraeg ac ni fydd hyn yn anwain at unrhyw oedl.
We welcome correspondence in Welsh.
We will respond to any correspondence in Welsh and this will not lead to any delay.

SCHEDULE 1C Article 2D

**CONSULTATION BEFORE APPLYING FOR PLANNING
PERMISSION**

Town and Country Planning (Development Management Procedure) (Wales) Order 2012

CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION

NOTICE UNDER ARTICLES 2D

(to be served on specialist consultees, as defined by article 2(1) of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012

Purpose of this notice: this notice comprises a formal request for a pre-application consultation response under article 2D of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012.

Proposed development at: **New Primary School, Nine Acre, Westminster Drive, Wrexham.**

I give notice that: Wrexham County Borough Council.

Is intending to apply for planning permission to: Wrexham County Borough Council.

You may inspect copies of:

- The proposed application
- The site plan and location plan
- Other supporting documents


Online at: www.yourvoicewrexham.net

(or)

Paper copies of the information will be provided on written request either via postal request to, The Byre, Croesnewydd Hall, Wrexham, LL13 7YP, or via email to wrexham@lawray.co.uk. The drawings will be provided in A3 size. Please request paper copies if required within 14 days of receipt of this notice, to ensure they can be provided within the 28-day consultation period.

In accordance with the requirements of article 2E of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012, a consultation response must be sent to nineacreconsultation@wrexham.gov.uk. Or alternatively please send correspondence to Housing and Economy Department, Ruthin Road, Wrexham. LL13 7TU, for the attention of Nine Acre Consultation.

By: 16th August 2020

Signed: 

Date: 20.07.2020

APPENDIX D
RESPONSES FROM COMMUNITY CONSULTEES

From: Geoff Lowe

Sent: 16 April 2020 08:58

To: [REDACTED]

Subject: Pre - Application Consultation New Primary School, Nine Acre, Westminster Drive, Wrexham.

Hello [REDACTED]

Please forward these observations onto colleagues concerning the above subject this is difficult knowing

how much this New Primary School is needed and the importance of young people receiving Education in

what should be a modern educational purpose built equipped building plus I feel I should point out that I am

supporter of faith school education and the excellent standards it provides for its pupils.

But I have very serious concerns about the dangerous traffic management problems this will bring to residents

on The Beeches, Cliden Grove, Bromfield Grove, Yale Grove and Rhosnesni Lane.

The reason I raise this very serious concern is because over the years that traffic management around our

schools has increased to an alarming level during this period WCBC has failed to address this very serious

risk to safety and obvious pollution around schools to pupils, School staff and residents who live around the

schools I strongly believe WCBC does not give enough consideration to the the anti social behaviour issues

this causes around schools which is not what young people should be exposed to if WCBC ignore these

problems then many people will view this as neglecting their responsibilities.

I also have serious concerns regarding the traffic problems this will generate on one of the main routes into

Wrexham Town in particularly around Prices Lane during the busy travel times.

Finally I feel that WCBC is once again about to dismiss the effect their actions have on the quality of life

on the families who have to live around WCBC mistakes please look carefully at the number of people

who live in this populated area.

Regards

Geoff Lowe.

Sent with BlackBerry Work
(www.blackberry.com)

From: Geoff Lowe [REDACTED]
Sent: 11 August 2020 15:15
To: Nick [REDACTED]
Subject: 9 Acre Field Proposed School Development Consultation.

Hello Nick

The following are observations given by residents from The Beeches Acton which which should be added to the earlier observations I submitted before the Coronavirus issue delayed the consultation

as you can appreciate the concerns raised by residents who have expressed serious questions over a

number risk to residents which WCBC appear to overlook.

1 The increase in traffic will place children and adults from The Beeches at risk because of the narrow

road which only allows one way vehicle use any attempt by another vehicle to access the road would

result in them having to mount the pavement or the grassed area resulting in damage to the grass

and tree roots.

2 Residents vehicles parked on the road will increase the issues raised in number 1 which is likely to

cause disputes which are a problem around schools in WCB which WCBC chooses to ignore.

3 The residents health along the Beeches will be damaged because of increased volume of traffic

a problem I believe WCBC has duty to consider.

4 The location of the main entrance onto the school campus is considered to be another serious risk

to road users Rhosnesi Lane is a very busy road serving to large housing estates Acton, Borras,

The Fairways, Goulbourne Estate, Maesydre also this road is used by traffic seeking the industrial estate,

the volume of traffic will increase traffic hold ups on the main road into Wrexham from Chester plus the

Roundabout on the Prices Lane Chester Road and Rhosnesi Lane another traffic locked area to be taken

into consideration which must include the public service buses that serve Wrexham Chester and housing

estates of Acton, Borras and the Goulbourne Estates.

5 This proposed plan will endanger the health of many residents who live around the site because of the

real established risks from traffic pollution which even WCBC should be aware of I believe that all children

should be educated in a safe clean modern environment but not at the expense of residents which includes

children who live in the area and have to inhale the pollutants generated by increased volume of traffic.

6 Last but not least is the question of the mature trees that line the Beeches the community is very concerned

about the effect the proposed development will have on the trees if WCBC claim not to be aware of parking

problems around our schools I shall be shocked my fear is these trees will be at serious risk from damage

due the grass verge being used for parking on.

Regards

Geoff Lowe.

Sent with BlackBerry Work
(www.blackberry.com)

From: Geoff Lowe [REDACTED]
Sent: 11 August 2020 15:58
To: Nick [REDACTED]
Subject: 9 Acre Field Consultation School Development.

Hello Nick

It is important that further information is included in the response to the above Consultation I refer to

the Trees on The Beeches you should be aware that those trees are protected by TPO in place on

them which adds to my concerns over the indiscriminate parking on the grass verge.

Regards

Geoff Lowe.

Sent with BlackBerry Work
(www.blackberry.com)

**CYNGOR
CYMUNED**

ACTON

**COMMUNITY
COUNCIL**

MRS CAROLE ROBERTS
Clerc/Clerk

c/o Acton Community Resource Centre

Your Ref: Nine Acre Consultation
Ref: 183.2/20/CR

Ffôn/Telephone :
Epost/Email:

11 August 2020

Lawray Architects on behalf of Wrexham County Borough Council
c/o Housing and Economy Department
Ruthin Road
Wrexham
LL13 7TU

Dear Sir,

**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES)
(AMENDMENT) ORDER 2016
PRE-APPLICATION CONSULTATION FOR NEW PRIMARY SCHOOL, NINE ACRE, WESTMINSTER DRIVE,
WREXHAM**

Further to your letter dated 20 July 2020 advising of the pre-planning consultation process for the above mentioned planning application which is classed as a "major" development or of national significance. The Community Council will make a detailed response to the full planning application for this site in due course. However it submits the following provisional comments in respect of the current Consultation:

"The Community Council considers that a Wellbeing Impact assessment must be made for this proposal to meet the duties contained within the Well-being of Future Generations (Wales) Act 2015 to ensure the proposed development will have a positive long term impact for the future. In particular consideration should be given to preventing things becoming worse. The Acton Community has a well-documented Green and Open Space deficit. The application site was declared Public Open Space by Wrexham County Borough Council in July 2004. The 2015 Act places a duty to deploy resources to prevent problems from occurring or getting worse to meet wellbeing objectives. One of the objectives of the Wrexham Public Services Board in its Local Wellbeing plan 2018-2023 is the need to be prepared for the future and to balance such preparations with looking after the Town's green spaces, habitats and natural environments.

The Environment (Wales) Act 2016 introduced an enhanced biodiversity and resilience of ecosystems duty (the section 6 or s6 duty) for public authorities in the exercise of functions in relation to Wales. The s6 duty requires that public authorities 'must seek to maintain and enhance biodiversity so far as consistent with the proper exercise of their functions and in so doing promote the resilience of ecosystems' The Community Council would encourage the application site to be retained as a protected Public Open Space with no loss of the existing amenity nor the mature trees on the site which support diverse ecosystems.

From a Planning point of view the Community Council strongly objects to the proposed development of this site for the following reasons: -

1. The proposed development will result in the loss of declared Public Open Space and have an adverse impact on the Town's green spaces, habitats and natural environment;
2. The proposed entrance, exit and arrangements for the dropping off and collection of pupils at the School will require several mature trees to be felled to widen the entrances, provide parking areas and necessitate the removal of part of the stone wall which is a remnant of the Acton Park estate wall, thus detracting from the visual heritage of the Acton Community;
3. The provision of 70 parking spaces on this Public Open Space as part of the proposed development will impact adversely on the permeable open space on the site;
4. The existing mature trees are not accurately shown on the site plan submitted with the documents. The proposal to remove mature trees should **not** be permitted as it is contrary to the Wrexham Planning Guidance note No. 17;
5. The proposed forest park will not mitigate the loss of green space, the removal of mature trees and the subsequent negative environmental impact and any environmental gains will take decades to reach maturity;
6. The Community of Acton is already well served with the Alexander, Acton Park, Barker's Lane and Borrass Park Primary Schools there is also a further Welsh Medium School being planned for the Borrass Park Site, together with the Rhosnesni High School. All of these schools are contained within the Community Boundary. This leads to severe traffic congestion particularly outside schools and the adjoining local roads. The Community Council is very concerned about the road safety for pupils attending these schools and provides funding for school crossing patrols at three sites within the Acton Community due to the hundreds of vehicles and pedestrians passing the school sites as evidenced from morning and afternoon road traffic surveys. The impact of developing a further School with the Community Boundaries that admits pupils from a Wrexham County Borough wide catchment area the majority of whom will have to travel to the school from across the Wrexham County will result in a higher level of daily car journeys and gridlock in the Acton Community area. It is difficult to envisage from the documents submitted how this together with the resultant air pollution and ozone contamination from idling buses and cars can be mitigated;
7. The residential streets adjoining the application site are already congested throughout the working day due to over-spillage of town centre parking;
8. The application site borders the Maesydre Conservation Zone and there must be special consideration given to the appearance and impact of developing a large two storey building on a declared Public Open Space; and
9. There will be loss of permeable open space through the proposed development. There are existing drainage issues with lying water during periods of heavy rain along Chester Road. There should be a Sustainable Drainage System developed and implemented to alleviate these problems and ensure that no new drainage issues are created for nearby residential land that lies lower than the nine acre field"

Yours Faithfully



Clerk to Acton Community Council

APPENDIX E
LETTERS SENT TO SPECIALIST CONSULTEES EXAMPLE—WELSH WATER

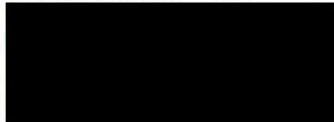
Pennaeth Tai a'r Economi/Head of Housing and Economy
Stephen Bayley

Adran Tai a'r Economi, Ffordd Rhuthun, Wrexham. LL13 7TU
Housing and Economy Department, Ruthin Road, Wrexham. LL13 7TU
www.wreccsam.gov.uk www.wrexham.gov.uk



DEVELOPER SERVICES
DWR CYMRU WELSH WATER

Ein Cyt/Our Ref Nine Acre Consultation
Dyddiad/Date 13th March 2020



Dear Sir/Madam,

**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT
PROCEDURE) (WALES) (AMENDMENT) ORDER 2016.**

**PRE-APPLICATION CONSULTATION FOR NEW PRIMARY SCHOOL, NINE ACRE,
WESTMINSTER DRIVE, WREXHAM.**

Grid Ref: E 333760 N 351271

As part of our pre application consultation process that applies to all planning applications for "major" developments and applications for developments of national significance I believe you may have comments that you may wish the Authority to consider before a formal Planning Application is submitted for future approval. If you believe the pre application consultation cannot be determined without details of this matter you must let me know as a matter of extreme urgency so that I can provide them to you.

The relevant documents prepared can be viewed on our website
www.yourvoicewrexham.net

We will also be displaying information at Wrexham Library for interested parties to view and a drop-in session will take place at the Memorial Hall, Bodhyfryd, Wrexham LL12 7AG on the 19th March 2020 from 3:30pm to 7:00pm.

We will be using the internet to gather people's views using the email nineacreconsultation@wrexham.gov.uk. Or alternatively please send correspondence to the address above for the attention of Nine Acre Consultation.

Please can you ensure that any comments etc. you do wish to make are received by the 9th April 2020.

Yours Faithfully,



Lawray Architects on behalf of Wrexham County Borough Council

*Rydym yn croeso i chi roi golwg ar ymraeth yn Gymraeg.
Byddwn yn ymateb i unrhyw ohebiaeth yn Gymraeg ac ni fydd hyn yn anwain at unrhyw oad.*

*We welcome correspondence in Welsh.
We will respond to any correspondence in Welsh and this will not lead to any delay.*

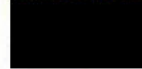
APPENDIX F RESPONSES FROM SPECIALIST CONSULTTEES



Developer Services



Gwasanaethau Datblygu



Wrexham County Borough Council
Housing & Economy Department
Ruthin Road
Wrexham
Wrexham
LL13 7TU

Date: 04/08/2020
Our Ref: PPA0005039

Dear Sir/Madam,

Grid Ref: 333806 351265

Site Address: Nine Acre, Westminster Drive, Wrexham

Development: 2D - Outline planning permission sought for the erection of a new school, associated bus bay, turning and drop off areas, car parking, playground, sports pitches, forest school area and new woodland walk Public Open Space

I refer to your pre-planning enquiry received relating to the above site, seeking our views on the capacity of our network of assets and infrastructure to accommodate your proposed development. Having reviewed the details submitted I can provide the following comments which should be taken into account within any future planning application for the development.

SEWERAGE

Domestic foul flows from the proposed development can be accommodated within the public sewerage system.

SURFACE WATER

We note it is proposed to discharge surface water into the public sewerage system. As of 7th January 2019, this proposed development is subject to Schedule 3 of the Flood and Water Management Act 2010. The development therefore requires approval of Sustainable Drainage Systems (SuDS) features, in accordance with the 'Statutory standards for sustainable drainage systems – designing, constructing, operating and maintaining surface water drainage systems'. It is therefore recommended that the developer engage in consultation with Wrexham County Borough Council, as the determining SuDS Approval Body (SAB), in relation to their proposals for SuDS features. Please note, Dwr Cymru Welsh Water is a statutory consultee to the SAB application process and will provide comments to any SuDS



Welsh Water is owned by Glas Cymru – a 'not-for-profit' company.
Mae Dŵr Cymru yn eiddo i Glas Cymru – cwmni 'nid-en-afal'.

We welcome correspondence in
Welsh and English.

Dŵr Cymru Cyf, a limited company registered in
Wales no 2366772. Registered office: Pentwyn Road,
Nelson, Treherts, Mid Glamorgan CF46 6LY

Rydym yn croeso awgrymion yn y
Cymraeg neu yn Saesneg.

Dŵr Cymru Cyf, cwmni cyfyngedig wedi'i gofrestru yng
Nghymru rhif 2366772. Searddfa gofrestradig: Heol Pentwyn
Nelson, Treherts, Morgannwg Ganol CF46 6LY.

proposals by response to SAB consultation.

Due to capacity constraints with the combined public sewerage network downstream of the site we wouldn't allow surface water runoff from the proposed development to discharge into the public sewerage system.

In addition, please note that no highway or land drainage run-off will be permitted to discharge directly or indirectly into the public sewerage system.

SEWERAGE TREATMENT

No problems are envisaged with the Waste Water Treatment Works for the treatment of domestic discharges from this site.

I trust the above information is helpful and will assist you in forming water and drainage strategies that should accompany any future planning application. I also attach copies of our water and sewer extract plans for the area, and a copy of our Planning Guidance Note which provides further information on our approach to the planning process, making connections to our systems and ensuring any existing public assets or infrastructure located within new development sites are protected.

Please note that our response is based on the information provided in your enquiry and should the information change we reserve the right to make a new representation. Should you have any queries or wish to discuss any aspect of our response please do not hesitate to contact our dedicated team of planning officers, either on [REDACTED] or via email at [REDACTED]

Please quote our reference number in all communications and correspondence.

Yours faithfully,

[REDACTED]

[REDACTED]
Planning Liaison Manager
Developer Services

Please Note that demands upon the water and sewerage systems change continually; consequently the information given above should be regarded as reliable for a maximum period of 12 months from the date of this letter.



Welsh Water is owned by Glas Cymru – a 'not-for-profit' company.
Mae Dŵr Cymru yn eiddo Glas Cymru – cwmni 'nid-er-eidd'.

We welcome correspondence in
Welsh and English

Dŵr Cymru Cyf, a limited company registered in
Wales no 2366777. Registered office: Penbryn Road,
Nelson, Treherbert, Mid Glamorgan CF46 6LY

Rydym yn croeso i chi gyswrtu yn y
Cymraeg neu yn Saesneg

Dŵr Cymru Cyf, cwmni cyfyngedig wedi'i gofrestru yng
Nghymru rhif 2366777. Swyddfa gofrestredig: Heol Penbryn
Nelson, Treherbert, Morgannwg Gernol CF46 6LY.

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: Nine Acre, Westminster Drive, Wrexham, LL12 7AU
Date: 21 July 2020 10:32:56
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Dear Keith,

I refer to your letter dated 20/07/20 and statutory pre-application consultation for the above.

Under the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 (hereafter referred to as the Order), we should be consulted where the proposed development falls within one of the categories set out in Schedule 4 of the Order where the Natural Resources Body for Wales is an identified specialist consultee. Any pre-application consultation submitted to us under the Order should be supported by the requisite notice and documents described in the Order. Here is a link to the development management procedure amendment where the schedule notice is included, along with the table of who should be consulted:

<http://www.assembly.wales/laid%20documents/sub-ld10539/sub-ld10539-e.pdf>

Please note, when consulted, our comments will only relate specifically to matters listed on our Checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018): <https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/our-role-in-planning-and-development/our-role-in-planning-and-development/?lang=en>. We will not consider potential effects on other matters, and therefore cannot *rule out the potential for the proposed development to affect other interests, including environmental interests of local importance*.

Having considered the information submitted, it does not appear that we are an identified specialist consultee in accordance with Schedule 4 of the Order. We note that no foul drainage information has been submitted and we have assumed a connection to the main sewer network, if this is not correct please get in touch. Therefore, we have no comments to make on this pre-application consultation. If you believe this to be incorrect, please contact us, giving reasons and we will reconsider our position.

Please note, in addition to planning permission, it is the applicant's responsibility to ensure that they secure all other permits/consents relevant to their development.

Kind Regards,

[REDACTED]

Cynorthwydd Cynllunio Datblygiad / Development Planning Assistant
Cyfoeth Naturiol Cymru / Natural Resources Wales
Maes y Ffynnon, Bangor
[Siaradwr Cymraeg](#)
cyfoethnaturiol.cymru / naturalresources.wales

Note: from Sport Wales

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: [External Email]- NINE ACRE FIELD CONSULTATION PERIOD
Date: 04 September 2020 14:23:36
Attachments: Outlook-sk5wsqx.png
Outlook-loao-ena.png
image442022.png
image993687.png
image088749.png
image044549.jpg

Dear Keith

Thank you for your email to my colleague [REDACTED] and the opportunity to comment on the proposed new school at the Nine Acre Field, Wrexham.

As set out in the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (SI 2012/801), Sport Wales is the statutory consultee on developments affecting playing fields. The application site has been used as a playing field and therefore consultation with Sport Wales is required.

In assessing such proposals, Sport Wales makes reference to paragraph 4.5.4 of Planning Policy Wales which 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."

No information has been provided which satisfies any of the above criteria and therefore Sport Wales would like to object to the application. Sport Wales would be happy to review this objection pending receipt of further information.

The supporting Design and Access Statement points out that the site is not available to the public and instead used privately but as noted above, Planning Policy Wales seeks to protect playing fields irrespective of ownership. Even so, the land is owned by Wrexham County Borough Council and it is within its gift to make the site available to the public.

With regard to the above policy and its three exceptions, the proposal involves the development of a significant portion of the site and there are no details of replacement so those two points are not applicable and therefore the only possible exception is that there is an excess of provision in the area. If such evidence can be provided showing a clear excess, Sport Wales will be happy to reconsider its objection. Please note however that Technical Advice Note (TAN) 16 Sport, Recreation and Open Space, a supplement to Planning Policy Wales, states "When 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".

Kind regards
[REDACTED]

From: [REDACTED]
Sent: 06 October 2020 13:34
To: [REDACTED]
Subject: FW: Flooding Issues Westminster Drive Wrexham

Hi [REDACTED]

The NRW surface water flood map attached shows the adjacent streets as being up to a high extent of flood risk from surface waters and watercourses. Surface water flooding happens when rainwater does not drain away through the normal drainage systems or infiltrate into the ground, but lies on or flows over the ground instead. High means that each year, this area has a chance of flooding of greater than 1 in 30 (3.3%).

Additionally, we have numerous incidents of surface water flooding on record in Westminster Drive and adjacent streets. I have reviewed our QGIS data and most of the flooding incidents on Rhosnesni Lane and Westminster Drive are listed as a result of the gullies surcharging. However, it is not clear if this is a result of blocked gullies from debris / sediment build up or as a result of capacity issues with the drainage network, which without further investigation it will be impossible for us to identify.

Kind regards
[REDACTED]

