



## Ysgol Plas Brondyffryn, Denbigh Site Justification Statement

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## 1.0 INTRODUCTION

- 1.1 Cassidy + Ashton have been instructed by Wates to oversee the preparation and submission of a Full Planning Application to Denbighshire County Council.
- 1.2 The application site is Land West of Ystrad Road, Denbigh, LL16 4PQ.
- 1.3 The application is being made on behalf of Denbighshire County Council and Ysgol Plas Brondyffryn, for the following:

*Erection of a new Ysgol Plas Brondyffryn Special Educational Needs (SEN) School for ages 3-19, including formation of Multi Use Games Areas (2no.), external plant / services area, new 118 space car parking area (including 14 electric charging bays), minibus parking (4no.), cycle parking (60no.), designated drop off area, new vehicular access off Ystrad Road, extension / improvements to existing active travel route, community café, landscaping works and all other associated works.*
- 1.4 This Site Justification Statement sets out the background to Ysgol Plas Brondyffryn (YPB) and the associated site requirements for the proposed new School. Subsequently, the Statement defines the process which was undertaken in identifying the most suitable development site and the rationale behind the site selection.
- 1.5 This Justification Statement includes a Sequential Site Assessment which concludes that the Application site is the most feasible for the proposed development.
- 1.6 This Statement is to be read in conjunction with a series of plans and other documentation, comprising the planning application pack as a whole.

## 2.0 SITE AND CONTEXT



**Fig. 1 Site Location [Source: Google Maps]**

- 2.1 This Application site is Land West of Ystrad Road, Denbigh.
- 2.2 The site is located c. 1 mile from Denbigh Town Centre, sited immediately South of Denbigh Leisure Centre and South-east of Denbigh High School (as demonstrated by Fig.1).
- 2.3 The Application site as a whole extends to c. 2.6 ha, encompassing an area of land currently associated with Denbigh High School and associated land for proposed active travel enhancements and drainage connections. The total developable school site itself extends to 2.42 ha, concerning the existing Denbigh High playing field.
- 2.4 The development site is an existing sports pitch, which forms part of an extensive profile of playing fields within the immediate vicinity.
- 2.5 The site is generally level with few landscape features, being used as sporting facilities. Whilst there are no trees on the site itself, there are however a number of boundary trees.
- 2.6 The site is accessible off Ystrad Road, connecting to the A543 to the North, which is a principal route running between Denbigh and Pentrefoelas, where it joins the A5.
- 2.7 As such, the site is highly accessible via private motor car, situated in close proximity to a number of key A-roads, with the A55 North Wales Expressway c. 6 miles to the North.

- 2.8 The nearest bus stop is located less than 300m North-east of the site, on the A543 at Pinetree Court. The stop has frequent services to Wrexham, Ruthin, Groes Efa and Llandyrnog.
- 2.9 An active travel route runs around the Southern and Eastern perimeter of the site.
- 2.10 As such, it is considered that the site is in a sustainable and accessible location.



## 3.0 BACKGROUND / SITE REQUIREMENTS

- 3.1 The proposed development concerns the redevelopment of this land for the construction of a new SEN School, enabling the amalgamation of the schools age 3-19 educational provision on one site.
- 3.2 The opportunity for investment in Ysgol Plas Brondyffryn has arisen following its selection as a priority project in Denbighshire Strategic Outline Programme for Sustainable Communities for Learning (formerly known as 21st Century Schools), an investment programme jointly funded by Welsh Government and Local Authorities.
- 3.3 The Strategic Outline Programme included the following text:

Review of site location for Ysgol Plas Brondyffryn

*Ysgol Plas Brondyffryn provides provision for children with Autism. The service is currently utilised by children across the wider North Wales area. The school is based on a number of sites in the town. The primary provision is co-located as above whilst the secondary provision is co-located with Denbigh High School.*

*Ysgol Plas Brondyffryn is a school which has been based in Denbigh since its initial establishment, first at Plas Brondyffryn Hall and then at its current sites across the town of Denbigh.*

- 3.4 This Chapter will define a number of identified requirements for the development site and therefore delineate the parameters for the Sequential Site Assessment, as set out within Chapter 4.

### SITE SIZE

- 3.5 The feasibility work for Ysgol Plas Brondyffryn identified a potential site requirement in the region of 20,000m<sup>2</sup> to host a revised site.
- 3.6 This requirement was informed by building bulletin guidance [BB] in relation to SEN School's (BB104). BB104 guidance suggested the minimum site area for a school this size should be 20,740m<sup>2</sup>. This equates to 2.074 ha.

### SITE LOCATION

- 3.7 Being an established facility, delivering education to pupils with complex specialist needs, the location of the proposed new Ysgol Plas Brondyffryn site is fundamental to its ongoing effective operation.
- 3.8 As set out above, YPB has a longstanding history within Denbigh, having always been based in or around the town since its establishment.

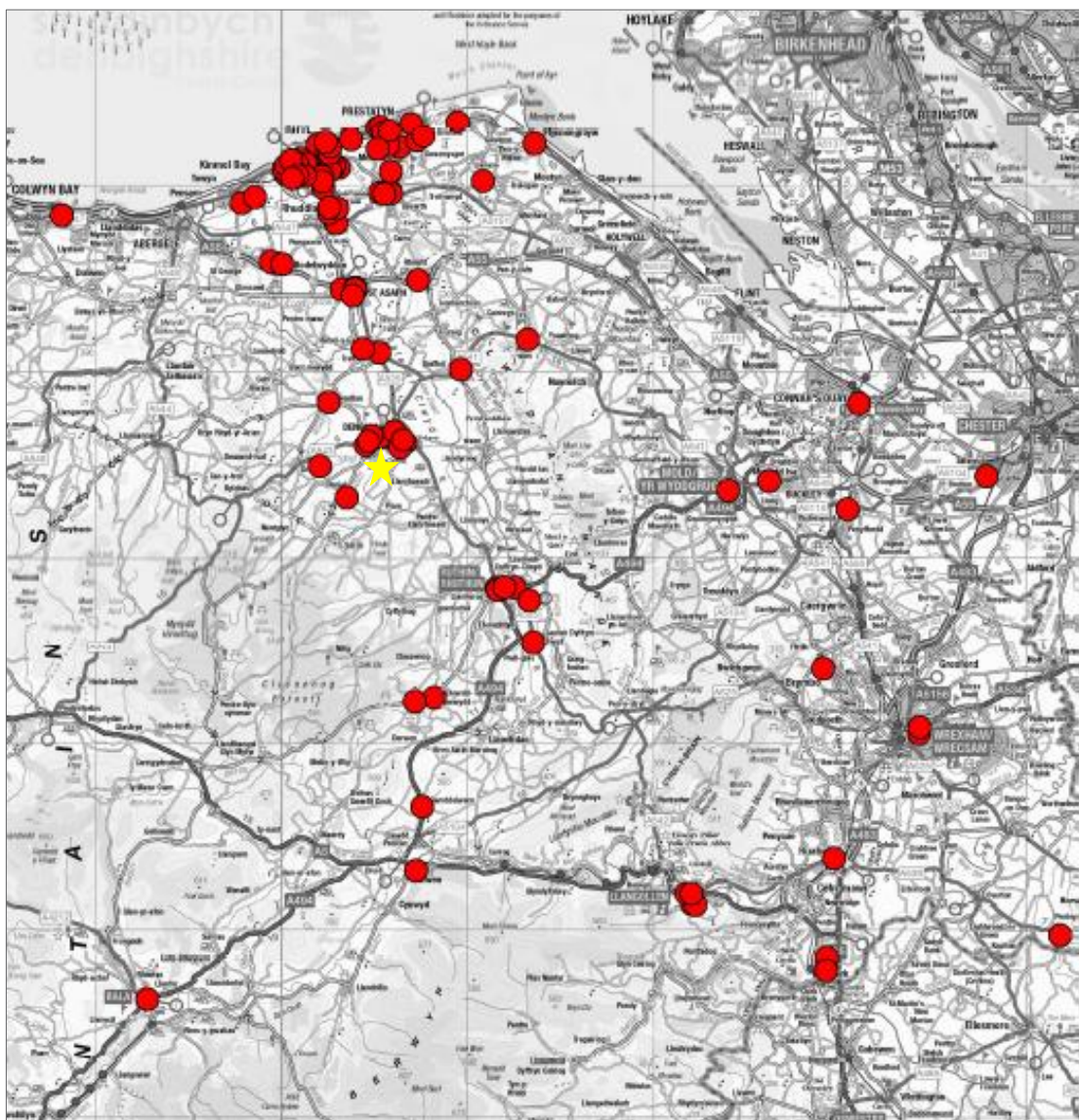
- 3.9 Due to the specialist nature of the School, it serves a wider catchment area and a large number of pupils are based in the North of Denbighshire, with many in the town of Denbigh in particular.
- 3.10 With the specialist nature in mind, it is not practical for pupils to travel long distances to and from School each day and so maintaining a central location to the County was considered fundamental in the site selection process.
- 3.11 In light of this and considering each of the existing three sites are within the town, Denbigh was identified as the most appropriate, and in fact rational location for the new build YPB.

### LAND AVAILABILITY ACROSS THE COUNTY

- 3.12 Notwithstanding the position that Denbigh is the most rational location for the new YPB, other areas across the County have been considered for completeness, so as to ensure the most comprehensive site search and in turn, the selection of the most appropriate development site.
- 3.13 In the town of Rhyl the associated flood risks considerably reduce the search area for a potential site. In particular much of the land to the North and East of the town are impacted by risks associated with tidal or river flooding. The
- 3.14 In the neighbouring town of Prestatyn there is also a large area of the town impacted by flood risk based on current information from National Resources Wales. Most of the North of the town, and in particular to the North of the railway line is at high flood risk and therefore condemned from a planning perspective. This reduces the search to the corridor to the Southern end of the town around the A547 road area where the topography changes. This area has been considered within the sequential assessment.
- 3.15 The Sequential Site Assessment (Chapter 4) sets out a comprehensive review of each of these sites against the identified search criteria. The assessment therefore concludes the most suitable land available for the proposed development.

## PUPIL CATCHMENT / MOVEMENT

3.16 In identifying the most appropriate location of the Application site, careful consideration has been given to the **ease of access** to all pupils, which is imperative due to the nature of their specialist needs.



*Fig.2 Pupil Catchment [Source: Denbighshire Council Education Team]*

3.17 Figure 2 demonstrates the current pupil catchment and spread for Ysgol Plas Brondyffryn. Each of the red markers represents a post code of a pupil. In providing contextual clarity, the yellow marker approximately denotes the Denbigh area.

3.18 Although Figure 2 demonstrates that a large number of pupils live to the North of the County, siting the proposed YPB to the North would significantly increase travel time for pupils living in the South of the County. A number



of pupils reside in the South of the County including the Dee Valley area, together with a number of pupils from Flintshire and Wrexham.

- 3.19 As demonstrated by Figure 3, the majority of pupils are within 20 miles of the school with only 11.4% travelling in excess of this distance.

Distance	Number of pupils	% of school population
Under 1 mile	6	4.5
1-5 miles	10	7.6
5-10 miles	32	24.2
10-20 miles	69	52.3
Over 20 miles	15	11.4

**Fig.3 Pupil Distribution [Source: Denbighshire Council Education Team]**

- 3.20 Due to the specialist nature of these pupils needs, it is not practical for them to travel long distances to and from school each day and so maintaining a central County location is fundamental and makes logical sense.

### JUSTIFICATION FOR RETAINING A SITE IN DENBIGH

- 3.21 From an educational perspective there are number of reasons as to why the School should remain within the town of Denbigh.
- 3.22 The strong links YPB has established with Denbigh High are imperative and would not be maintained should the School move away from the town.
- 3.23 Through this relationship, each year pupils are identified that would benefit from some time in the 'mainstream' setting at Denbigh High to prepare for mainstream college, should this be an appropriate opportunity.
- 3.24 Denbigh is ideally situated in the centre of the County to ensure travel times are reasonable for all pupils, which is imperative given the nature of the school. As a general rule, the Local Authority consider the maximum reasonable journey time to be approximately 40 minutes from a pupil's home to school.
- 3.25 In regards to SEN/ALN there are other things to consider- pupils may not be able to share a car or pupils may need to go straight to school for medical reasons. Transport for SEN/ALN pupils is not straight forward and very much focused on pupil's requirements and an assessment of individual needs. Location in the North of the County would result in significant travel times for those pupils living in the South of the County and in neighbouring authorities.

## 4.0 SEQUENTIAL SITE ASSESSMENT

- 4.1 This Chapter will document the detailed site search process which was undertaken in identifying the most suitable site for the development of the new School.
- 4.2 The first stage of the sequential site assessment process was to identify sites by size, should they meet the required (c. 2ha +), the sites formed a consideration and their characteristics were evaluated further.
- 4.3 The parameters for the sequential site assessment were defined in line with the various requirements as presented within Chapter 3.
- 4.4 In addition to these requirements, the following development considerations were assessed:
- Landowner (Council ownership a requirement, due to viability)
  - Flood Risk
  - Highways / Accessibility
  - Agricultural Land Classification
  - Planning Policy Status / Allocation
- 4.5 Although Denbigh was identified as the preferred location for the proposed new School, for completeness and to ensure a thorough search of available options, other areas across the County were included within the site search.
- 4.6 The most significant constraints to each site are underlined for clarity.

Site No.	Address	Size	Land Ownership	Flood Risk	Highways / Accessibility	Agricultural Land Classification	Planning Policy Status	Comments / Conclusions
<b>Rhyl</b>								
1	Christ the Word Catholic School playing field, Ffordd Derwen	Insufficient land area available (flood risk)	Denbighshire County Council (DCC)	<u>High Risk</u>	Private access would have to be sought off Brynmor Avenue, demolishing the existing play area.	U	BSC 11 Land – Recreation and Open Space	<u>Flood risk</u> significantly reduces the area available for development. <u>Currently used</u> by Christ the Word Catholic school.
2	Aberkinsey Park	Insufficient land area available (proposed primary school)	DCC / Private	Low Risk	Accessible via Aberkinsey Estate.	3a, small area U	BSC 11 – Recreation and Open Space / BSC 12 – Community Facilities	Area designated as BSC12 has been earmarked for a new primary school as part of the growth of the Aberkinsey Estate (Application Ref. 04/01/2012). <u>Insufficient land area remaining.</u>
3	Land off Ffordd Derwen	Sufficient land area	Private	<u>High Risk</u>	Accessible	3a / 3b	<u>RD2 - Green Barrier</u>	Site omitted due to being designated <u>green barrier</u> and high <u>flood risk.</u>
4	Plas Bruton	Sufficient land area	DCC	Low Risk	Improved <u>access</u> to the site would impact on existing dwellings and removal of	3a / 3b	BSC 11 Land – Recreation and Open Space	Development would result in a <u>loss of habitat,</u> landscaped tree areas and pond to the north of the site.

					gardens to allow required highway improvements			
<b>Prestatyn</b>								
5	Prestatyn High School playing fields / The Meadows Home of Prestatyn Sports FC	Sufficient land area	DCC	Low Risk	Accessible	2 / 3a	<u>Green Barrier</u>	Site unlikely to be supported via planning process based on previous advice. <u>Under use</u> of Prestatyn High / Prestatyn Sports FC. Developing this land would restrict their access to sporting facilities, which is limited in the vicinity.
6	Old Kwik Save Site	Sufficient land area	Private	<u>High Risk</u>	Accessible	3b / U	<u>Allocated for employment use</u>	Site omitted due to planning constraints ( <u>flood risk / employment allocation</u> ).
<b>Denbigh</b>								
7	Lodge Farm, next to Ysgol Pendref	Sufficient land area	Private	Low Risk	Accessible	3a	<u>Allocated for housing</u>	<u>Topography of site would be challenging, utility strip</u> through main part of site which would impact design. Current land owner recently sought

								permission for housing.
8	Ty'r Ysgol site	Sufficient land area	DCC <u>99 year lease</u> from Welsh Government	Low risk	Accessible	3a	<u>Outside development boundary</u>	Not considered practical due to <u>topography</u> of the site, steeply sloping and would require <u>significant excavation</u> .
9	Denbigh High School Playing Fields	Sufficient land area	DCC	Low risk	Accessible	3a / U	BSC 11 Land – Recreation and Open Space	<u>Preferred option</u> - DHS have use of another suitably sized field to ensure the PE curriculum can be delivered, the school will also maintain links with Denbigh High school.
<b>Rhuddlan</b>								
10	Rhuddlan Town Banks Ditch Site, South of A5151 and East of Harding Ave	Sufficient land area	<u>Private</u>	Low risk	Accessible	<u>2</u> / 3a	<u>Outside development boundary</u>	Site omitted due to cost of land and as the land is a <u>Scheduled Ancient Monument</u> any development on this land would warrant an <u>Archaeological watch</u> . Possible landscape issues, impact on view from and to the



								Clwydian Hills AONB.
11	Bryngwyn Farm	Sufficient land area	DCC	High Risk	Off the A525, potentially complex highway issue	1 / 3b	Outside development boundary	Omit site due to current use and planning and flooding constraints.
<b>St Asaph</b>								
12	Greengates Farm (near Optic)	Sufficient land area	DCC	Low Risk	Complex access Options would be through Business Park, off Cwttir Lane	3b	Outside development boundary and within Employment Areas	Omit site due to access to site prohibitive and planning constraints. Close proximity of the A55 would provide acoustic challenges
13	Bodelwyddan - Key Strategic Site (KSS)	Sufficient land area	Private	Low Risk	Accessible	3a / 3b	Land within the KSS has already been allocated for housing and a primary school, will be difficult to secure land for a special school within the KSS.	Site omitted due to timelines being influenced by LDP process, no site allocated for school in masterplan, more likely the school would be situated just outside the boarder of the KSS and there would be possible issues regarding the proximity of pylons and the lack of infrastructure.

## SEQUENTIAL SITE ASSESSMENT CONCLUSION

- 4.7 The settlement boundary for the various towns within Denbighshire was a key initial consideration, forming the starting point for the site search. In line with National and Local Planning policy, an out of settlement location would only be considered where there is insufficient land available to accommodate the development.
- 4.8 Although Denbigh was identified as the preferred location for the proposed new School, for completeness and to ensure a thorough search of available options, other areas across the County were included within the site search, notably Rhyl and Prestatyn, forming the *Regional Growth Area*.
- 4.9 The only potential sites in the town of Rhyl in excess of the required size and not hindered by the flood risk would be considered as BSC11 in the current Local Development Plan (Recreation and Open Space). These were Plas Bruton and Aberkinsey Park. Each of these sites also have a grading of 3a with respect to Agricultural Land Classification across much of the land, as with the Application site.
- 4.10 In terms of potential sites within the town of Prestatyn, a site was identified which is currently designated as playing fields for Prestatyn High school, known locally as the Meadows. This site is also allocated under BSC11 in the Local Development Plan but is outside of the development boundary of the town. The wider area where this site is located is designated as RD2 – Green Barrier. This policy states that development will only be permitted provided that the open character and appearance of the land is not prejudiced.
- 4.11 As set out above there are no sites of sufficient merit to warrant Ysgol Plas Brondyffryn relocating away from Denbigh, in line with the location justification defined within Chapter 3.
- 4.12 Further to this, it is clear that the Application site is the most suitable in line with the identified site requirements (Chapter 3) and has the least constraints of all available sites. On this basis, the site search concluded the proposed site as the most appropriate for development.

## 5.0 PLANNING POLICY AND PLAYING FIELD DISPOSAL GUIDANCE

- 5.1 This Chapter will set out pertinent points from Local and National Planning Policy and guidance in relation to the development of existing playing fields / open space and the wider provision of community facilities.
- 5.2 It is acknowledged that Sport Wales do not have publicly accessible criteria for the development of playing fields, however other relevant guidance is drawn upon.

### PLANNING POLICY WALES

- 5.3 Planning Policy Wales Edition 11 (PPW) sets out the Welsh Assembly Government's planning policies for Wales and how these should be applied.
- 5.4 The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015.
- 5.5 **Paragraph 4.4.1** highlights the importance of provisions for communities, stating that community facilities (such as school's) contribute to a sense of place which is important to the health, well-being and amenity of local communities and their existence is often a key element in creating viable and sustainable places.
- 5.6 **Paragraph 4.5.4** asserts 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.
- 5.7 The development of this site will enhance the special educational needs provision, in addition to wider community facilities in the town of Denbigh. The two Multi-use Games pitches will represent an alternative provision to the existing grass playing field, making an important contribution to the all-weather pitch provision in the area and thus providing a qualitative enhancement.

## TECHNICAL ADVICE NOTE 16

- 5.8 Technical advice notes (TANs) provide detailed planning advice. Local planning authorities take them into account when they are preparing development plans.
- 5.9 Technical advice note 16 sets out detailed guidance in relation to sport, recreation and open space.
- 5.10 The guidance highlights the priority to protect and enhance existing sport and recreation facilities and open spaces.
- 5.11 It is identified that **better, or at least equivalent alternative provision can often provide more value** and thus **benefit to a community** than simply retaining an existing provision.

*"This means that the replacement land or facilities should be equivalent to, or better than, that taken in terms of its **capacity to provide for the area's needs**. It will usually, but not necessarily, relate to its size, characteristics, location and accessibility."*

- 5.12 The guidance confirms that;

*"Only where it can be clearly shown that there is **no deficiency**, should the possibility of their use for alternative development be considered. 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."*

## DENBIGHSHIRE COUNTY COUNCIL LOCAL DEVELOPMENT PLAN

- 5.13 The site is allocated under **Policy BSC11 – Recreation and Open Space**, which seeks to protect and enhance existing recreation, public open space, allotments and amenity greenspace where possible. The policy states that;

*"Development that would result in the loss of public or private land with recreational and/or amenity value will only be permitted where **alternative outdoor provision of equivalent or greater community benefit is provided**."*

- 5.14 **Policy BSC12 – Community Facilities**, states that proposals for the provision of community facilities will be supported where they are located within existing development boundaries. The policy proceeds to state that access to community facilities is an essential element of sustainable and inclusive communities. The Council will support and encourage the retention and improvement of community facilities which provide an essential facility to support the sustainability of Denbighshire's communities.

## THE PLAYING FIELDS (COMMUNITY INVOLVEMENT IN DISPOSAL DECISIONS) (WALES) REGULATIONS 2015

- 5.15 The Playing Fields (Community Involvement in Disposal Decisions) (Wales) Regulations 2015 set out the Welsh Government guidance for decisions by Local Authorities on the proposed disposal of land consisting, or forming part of a playing field.
- 5.16 Statutory guidance issued by the Welsh Ministers in 2014 states that Local Authorities ‘...should recognise the importance of playing fields as areas of community use for organised sporting activities and for play and informal recreational use’.
- 5.17 The Programme for Government, launched in 2012, restated the Welsh Government’s commitments to:
- I. Work with Sport Wales and others to promote physical activity for people of all ages; and
  - II. Ensure that all children and young people are able to access a range of sporting opportunities as part of the formal curriculum, after school and in the community.
- 5.18 The guidance document states, in line with Planning Policy Wales 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; or
  - There is an **excess of such provision** in the area

## SPORT ENGLAND GUIDANCE – AS PRECEDENT

- 5.19 We acknowledge that there does not appear to be publically accessible criteria published by Sport Wales for assessing proposals affecting playing fields, however it is expected that a similar approach will be taken as for Sport England.
- 5.20 Sport England set out a three objective approach;
- **Protect** – to protect the right opportunities in the right places
  - **Enhance** – to enhance opportunities through better use of existing provision
  - **Provide** – to provide new opportunities to meet the needs of current and future generations.



## DENBIGHSHIRE LOCAL DEVELOPMENT PLAN – OPEN SPACE ASSESSMENT AND AUDIT

- 5.21 The Open Space Assessment and Audit was undertaken in line with the adoption of the Denbighshire Local Development Plan 2006-2021 (adopted June 2013).
- 5.22 The document sets out the provision of various forms of open space across Denbighshire, at a measure of Hectares per 1,000 population, concluding against the Fields in Trust quantity guidelines for Wales, and the Denbighshire average.
- 5.23 It is identified that the provision of outdoor sports facilities in the *Denbigh Lower* area is in excess of the County average, by 0.25 ha / 1,000 population.
- 5.24 The document sets out that – in line with Sport England’s guidance of undertaking a Playing Pitch Strategy - levels of provision should be determined by **pitch capacity** (i.e. how many games per week a pitch can host) and club demand (i.e. how many matches a week takes place); **not through the application of quantity standards**. It is identified that although this guidance related to England, as there is currently no Welsh Guidance available, this provides a useful tool.
- 5.25 The document makes the recommendation that a **demand led approach** should be adopted to Outdoor Sports Facilities.
- 5.26 Alternative provision is acknowledged for the community benefits it can deliver:
- “**Alternative outdoor sports facilities** such as **astro-turf pitches**, fitness equipment suites, trim trails or mountain bike trails should be considered as options for provision as they may create a **wider benefit to the area** and **encourage more people to participate** in activities which would improve their overall health and wellbeing.”

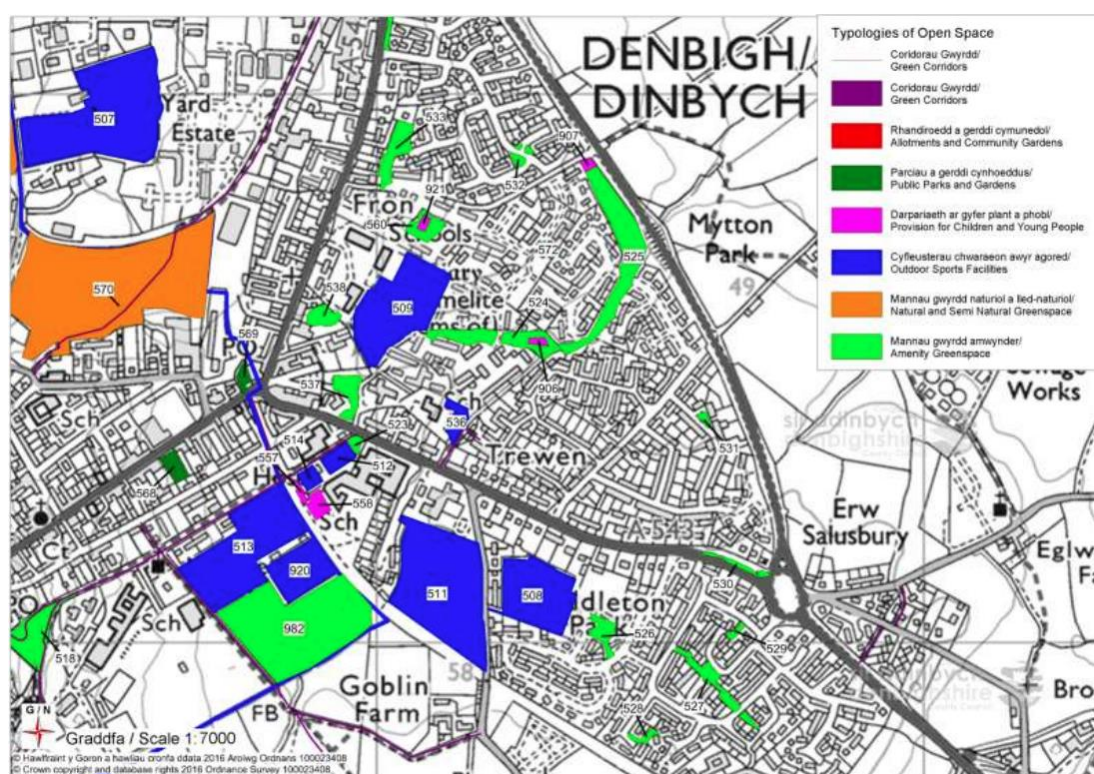
## RESPONSE AND CONCLUSION

- 5.27 The principles running through the guidance set out in this Statement conclude that where there is a surplus in provision and/or where an enhancement upon existing provision is to be achieved, the loss of a playing field may be justified.
- 5.28 It is presented that there is considerable comparable provision to the existing playing field in the immediate vicinity and the proposed development represents a qualitative enhancement through the introduction of all-weather Multi-use Games pitches.

- 5.29 Extending the accessibility of these pitches beyond the School to the wider community represents a further enhancement given that the field is inaccessible for much of the community.
- 5.30 This is further reinforced by enhancements to the field South of Middle Parc (existing Denbigh High field) which will facilitate the use of the field for a wider variety of sporting facilities.
- 5.31 Whilst the redevelopment of the site will represent a quantitative loss of open playing fields, it will represent an alternative provision (MUGA's) and a greater variety of sporting facilities, representing a qualitative gain.
- 5.32 Notably, these proposals concern the provision of a vital community asset to which there is great demand in the local area and as such, is supported by both PPW and the LDP.

## 6.0 JUSTIFICATION - PLAYING FIELD LOSS

- 6.1 Whilst it is acknowledged that the site comprises an existing sports pitch, it is presented that the proposed development would not represent an unjustified loss of playing fields in line with the guidance set out above. This is on the basis that there is a considerable comparable provision in the immediate locality, namely the Field South of Middle Parc which is also under the control of Denbigh High. These neighbouring facilities are highlighted within Figure 4. Denbigh Leisure Centre is also situated to the North of the site, with an existing all weather pitch.
- 6.2 Given that both the application site and the field South of Middle Parc are significantly underutilised, it is the intention that the proposed development will concentrate the use by opening up the application site for development.



**Fig. 4 Overview Map of Denbigh Lower [Source: Denbighshire County Council Open Space Audit and Assessment Report]**

### SUFFICIENT COMPARABLE PROVISION

- 6.3 The Denbighshire County Council Open Space Assessment and Audit documents the County’s position, concluding that the *Denbigh Lower* area

is in a 0.25 sufficiency (ha per 1,000 population) with regard to Outdoor sports facilities when considered against the Denbighshire average.

- 6.4 The Application site is denoted as field 511 on the above Open Space Audit and Assessment extract, classified as an *Outdoor Sports Facility*. Whilst the 511 classification extends to 3.16 ha, this proposal concerns the southern field, 2.42 ha, excluding the existing AstroTurf pitch. Outdoor Sports Facilities are defined within the Report as follows;

*Outdoor sports facilities (with natural or artificial surfaces, publicly or privately owned) - including tennis courts, bowling greens, sports pitches, golf courses, athletics tracks, school and other institutional playing fields, and other outdoor sports areas. A sports pitch is currently defined as a playing field, larger than 0.4 hectares in size that has been marked for team games in the last five years.*

- 6.5 The surrounding comparable provision set out in 6.1 is illustrated through the blue shading of *outdoor sports facilities* in Figure 3 above, which demonstrates the high concentration of such facilities in the immediate vicinity.

- 6.6 Field Ref. 982 – denoted in green within Figure 3 is classified as ‘Amenity Greenspace’ within the Open Space Audit and Assessment Report. The definition of such is set out within the Report as follows;

*"Amenity greenspace (most commonly, but not exclusively in housing areas) – including informal recreation spaces (private or open to the public), roadside verges, greenspaces in and around housing and other premises e.g. hospitals, schools and colleges, industrial and business premises, domestic gardens and grounds, and village greens."*

- 6.7 With this definition in mind, we are of the view that the playing field (982) is more suitably classified as an ‘Outdoor Sports Facility’ (as defined at 6.4), due to its more formal playing pitch nature, the provision of goals and similarity with neighbouring Outdoor Sports Facility Ref 513.

- 6.8 Notably, site Ref. 982 (*Middle Parc Recreational Area*) extends to c. 3.17 ha. This is in excess of our 2.42 ha proposal site and therefore on this basis represents a further quantitative addition to the Outdoor Sports Facility provision in the immediate locality.

- 6.9 It is therefore understood that there is a more significant provision of comparable outdoor sports facilities within the area and with this in mind, the development of this land to support the provision of a specialist education facility does not represent a material and unjustified loss when considered in the wider context.

6.10 Further to this, the development of the land so as to provide an educational facility – which is of particular demand - is wholly acceptable and appropriate in line with wider planning policy.

## ENHANCEMENT ON EXISTING PROVISION

### MULTI-USE GAMES PITCHES (ON SITE)

- 6.11 The provision of the Multi-use Games pitches is considered to represent an **enhanced quality** in comparison to the current grass playing field, of which there is extensive comparable provision within the immediate vicinity (as defined within 6.1 and Figure 4).
- 6.12 The Multi-use Games pitches will make an important contribution to the all-weather pitch provision in the local area and thus whilst the redevelopment of the site will represent a quantitative loss in Open Space, it will represent a qualitative gain.
- 6.13 Opening up these pitches for community use represents a further enhancement on the existing provision, which is broadly inaccessible and underutilised by the community.
- 6.14 The proposed MUGA's will be a porous tarmac surface. Whilst it is acknowledged Sport Wales may anticipate a surface such as 3G, this would not be appropriate for a SEN School.
- 6.15 This is on the basis of the possible consumption of the surface by pupils and the associated health and safety risk. In further consideration, a 3G surface would not be suitable for wheelchair usage, should this be a specific pupil requirement.
- 6.16 The MUGA's will be opened up for community use and will be accessible off the Northern internal access road. This will facilitate one continuous community use space that can be effectively managed separately from the main School secure zone.
- 6.17 The importance of playing fields as a resource which make a positive contribution to maintaining and improving the health and well-being of the community is fully acknowledged and hence is a factor in the consideration of opening up the MUGA's for wider community use.



## OFF-SITE ENHANCMENTS

- 6.18 Further to the provision of the two MUGA's on site, enhancements to the field South of Middle Parc (Figure 4, site Ref. 982) are being explored.
- 6.19 From preliminary dialogue with Sport Wales, it is acknowledged that a full size football pitch would be an aspiration for the site, however it is clear that such a provision could not be accommodated within the Application site.
- 6.20 This aspiration is acknowledged and in response, enhancements to the field south of Middle Parc are being explored in line with the proposed development.
- 6.21 These enhancements are intended to be of a standard compliant with 'Community Use Spec' and would be opened up for community use at evenings and weekends.

## DENBIGH HIGH ACCESS TO PLAYING FIELDS

- 6.22 Given that both the application site and the field South of Middle Parc are significantly underutilised, it is the intention that the proposed development will concentrate the use by opening up the application site for development.
- 6.23 The present external pitches area for Denbigh High School is in excess of the requirements associated with current pupil numbers / capacity.
- 6.24 Based on the school capacity there is a requirement for 44,440m<sup>2</sup> of pitches and the school at present has access to an overall area of c. 69,743m<sup>2</sup>, inclusive of the all-weather pitch at the Leisure Centre.
- 6.25 During construction of Ysgol Plas Brondyffryn, pupils at Denbigh High School would retain access to the school field (South of Middle Parc) and the all-weather pitch.
- 6.26 Denbigh High School currently has a capacity of 984 although the school has been operating at a surplus of over 25% for the last 10 years. Based on the changed demographics of the town and future demand any revised proposals will see a reduced capacity for the school.
- 6.27 The two potential options for Denbigh High would be a 4 or 5 form secondary school which result in a capacity of either 725 or 938 including 6<sup>th</sup> form.
- 6.28 This would require pitches to be in the size of 36,250m<sup>2</sup> to 42,830 m<sup>2</sup> moving forward.
- 6.29 The field South of Middle Parc that would be retained by Denbigh High School is approximately 33,729m<sup>2</sup>. This is complimented by the use of the all-weather pitch at the Leisure Centre which is approximately 6,239m<sup>2</sup>.

- 6.30 With all-weather pitch provision counted double for space requirements in line with space standards, Denbigh High would have access to pitches in the region of 46,207m<sup>2</sup>. This would be in excess of the suggested size for a 5 form entry school.
- 6.31 In considering the 'accessible area' of playing fields, it is equally important to consider the quality of such and the associated value to sporting activities. The associated qualitative enhancements associated with the proposed development (both on and off site) will in turn improve this value, to both *Ysgol Plas Brondyffryn* and *Denbigh High* pupils, in addition to the wider community.

## 7.0 CONCLUSIONS

- 7.1 The proposed development seeks the construction of a new Special Educational Needs School, co-locating three existing sites of Ysgol Plas Brondyffryn.
- 7.2 This Statement sets out the various site characteristics / requirements for the proposed new YPB, concluding that Denbigh is the most rational and feasible location.
- 7.3 Notwithstanding this identification of Denbigh as the preferred location, for completeness and to ensure a comprehensive site search, the sequential assessment considered the wider County, notably Rhyl and Prestatyn, forming the Regional Growth Area.

### PLAYING FIELD LOCATION

- 7.4 Whilst it is acknowledged that the Application site is an existing playing field used in association with Denbigh High School, this Statement evidences that the playing field loss is to be suitably mitigated through both on-site and off-site enhancements to sporting facilities (as set out in Chapter 6).
- 7.5 It is further presented that there is significant comparable facilities within the area and with this in mind, the development of this land to support the provision of a specialist education facility does not represent an unjustified loss when considered in the wider context.

### AGRICULTURAL LAND CLASSIFICATION

- 7.6 Whilst it is acknowledged that the Predictive Agricultural Land Classification (ALC) map identifies the majority of the Application site as Subgrade 3a, its size and current use as a playing field denotes that it would not be workable as agricultural land in its own right.
- 7.7 Having sought advice from The Welsh Government Land Quality Advice Service, with the level of infrastructure on site in mind, the Service has identified the site to be more a mosaic of grades 3a and 3b.
- 7.8 Further to this, it was recommended that Best and Most Versatile Land policy (PPW 11, paragraph 3.58 and 3.59) should not be applied to the Application site.
- 7.9 With this in mind, it is presented that the ALC map designation should not be considered a constraint to the Application site.

7.10 Notwithstanding this, the sequential site assessment concludes that there is not an available site of lower agricultural value that would be suitable for the proposed development.

7.11 ***This Statement evidences that the Application site is the most appropriate for the proposed YPB, considered in the context of all available sites in the locality.***

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