



Ysgol Plas Brondyffryn, Denbigh Supporting Planning 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 The proposed new School is for Ysgol Plas Brondyffryn (YPB), which is currently split across three sites in the town of Denbigh. The proposed development therefore represents an opportunity for pupils aged 3-19 to be co-located in a single flexible building, whilst allowing the School to become fully established and independent.
- 1.5 This supporting planning statement sets out the context of the site and considers the planning merits of the proposal, reaching the conclusion that the proposed development is compliant with local and national planning policy.
- 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:
 - Application Forms - *Cassidy + Ashton*
 - Supporting Planning Statement - *Cassidy + Ashton*
 - Site Justification Statement / Sequential Assessment) - *Cassidy + Ashton*
 - Community Linguistic Impact Assessment - *Cassidy + Ashton*
 - Design and Access Statement - *Pozzoni*
 - Location Plan - *Ares*
 - Existing / Proposed Site Plans / Landscaping Plans - *Ares*
 - Site Sections - *Ares*
 - Proposed Floor Plans, Elevations, Building Sections - *Pozzoni*
 - Drainage Plan - *Curtins*

- External Lighting Plan - *Wilson Gray Consulting*
- Access Plan - *Curtins*
- Transport Assessment - *Curtins*
- Interim Travel Plan - *Curtins*
- Flood Consequence Assessment & Sustainable Drainage Strategy - *Curtins*
- Noise Impact Assessment - *Stroma*
- Heritage Impact Assessment - *Henderson Heritage*
- Archaeological Appraisal - *Archaeology Wales*
- Arboricultural Impact Assessment / Method Statement - *Indigo*
- Preliminary Ecological Appraisal - *Indigo*
- Energy Assessment Report - *Wilson Gray Consulting*
- Thermal Comfort Analysis Report - *Wilson Gray Consulting*
- Pre-application Consultation Report (TBC) - *Cassidy + Ashton*

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 YSGOL PLAS BRONDYFFRYN

- 3.1 Ysgol Plas Brondyffryn is a Special Educational Needs School which is currently split across three sites in the town of Denbigh.
- 3.2 This proposal concerns the redevelopment of the Application site for the construction of a new SEN School, enabling the amalgamation of the schools age 3-19 educational provision on one site, whilst meeting the growing demand for places.
- 3.3 Figure 2 demonstrates the location of the existing school site's to be co-located.



Fig. 2 School Site's To Be Co-located

- 3.4 The school currently has a capacity of 133 pupils split across its 3 sites, comprising;
 - Primary (Ty'n Fron, Rhyl Road) – **41** pupils
 - Secondary (Park Street) - **76** pupils
 - Secondary (Ty'r Ysgol) – **16** pupils
- 3.5 The proposed new build facility would take this capacity to 220 no. pupils (plus an additional nursery capacity of 10 no. pupils).

- 3.6 YPB currently relies on the use of the facilities of other schools in the area and this new build development therefore provides an opportunity for the School to become fully established and independent.
- 3.7 The development of this new site will enhance the facilities of YPB, whilst streamlining the School's operation through co-location and thus enabling its independence from other Schools in the area.
- 3.8 Having all three Schools under one roof will enable consistency in the teaching and nurturing of the pupils. It will also be easier to drive and realise the School's values and further enhance the reputation of YPB as the North Wales centre of excellence for Autistic Spectrum Condition (ASC).

STAFF NUMBERS

- 3.9 The staff to student ratio at SEN Schools is higher due to the specialist nature of the School and its pupil's needs.
- 3.10 The current staff split is as follows;

Primary (Ty'n Fron, Rhyl Road) – **28** Full-time, **10** Part-time
Secondary (Park Street) – **34** Full-time, **6** Part-time
Secondary (Ty'r Ysgol) – **17** Full-time, **3** Part-time

Total – **77** Full-time, **19** Part-time

- 3.11 As a result of the proposed amalgamation of the YPB sites, the staff numbers are projected as follows;

Total – **90** Full-time, **22** Part-time

PARKING / TRANSPORT

- 3.12 One principal difference of an SEN School in comparison to mainstream schools is the transportation of pupils.
- 3.13 Due to the specialist nature of the School and the wide catchment area, pupils typically travel to / from School via County organised learner transport services.
- 3.14 Some vehicles drop off at multiple sites and accordingly, the co-location of the School on one site will make the management of transport and pupils more efficient.
- 3.15 The current transport operation split across the three sites is comprised of the following vehicles:

Out of County vehicles:

- *13 taxis which arrive at various sites*

County organised transport:

- *3 x 16 seaters*
- *10 x 8 seaters*
- *18 taxis*

3.16 The capacity of the Ysgol Plas Brondyffryn is due to increase by 65% and accordingly vehicles will increase. As such, the co-located site will need to provide sufficient drop off / pick up space to accommodate large and specialist vehicles.

3.17 In addition to the demand for such vehicles, staff parking is also enhanced in comparison to mainstream schools, with there being higher staff/student ratios, to facilitate the provision of more specialist education.

4.0 SITE HISTORY

- 4.1 A desktop study of the Denbighshire County Council Planning Register has highlighted a number of previous planning applications covering the site, associated with the neighbouring Denbigh High School and Leisure Centre.
- 4.2 The applications outlined below are considered to have relevance in the wider consideration of this application.

Ref. Number	Description of Proposal	Decision	Address	Date
1/6379	Siting of four single mobile classrooms	Approved	Denbigh High School, Ruthin Road, Denbigh	14/06/1983
1/7879	Formation of new vehicular access onto Ruthin Road	Approved	Denbigh High School, Ruthin Road, Denbigh	18/12/1985
01/594/96/PF	Construction of all-weather sports pitch	Approved	The Sports Pitch, rear of the Swimming Pool, Ruthin Road, Denbigh	04/12/1996
01/813/96/PS	Variation of Condition 2, 3 and 4 of Planning Permission 01/594/96/PF	Approved	The Sports Pitch, Denbigh	09/01/1997
01/2012/0191	Demolition of existing gymnasium and single-storey storage/changing room and erection of activity studio, storage/changing room and installation of low-level column lighting to existing car park areas	Approved	Denbigh Leisure Centre, Clwyd Avenue, Denbigh LL16 3HB	28/03/2012
01/2012/1194	Details of wall and roof materials submitted in accordance with condition number 2 of planning permission 01/2012/0191/PF	Approved	Denbigh Leisure Centre, Clwyd Avenue, Denbigh LL16 3HB	21/09/2012

5.0 PROPOSED DEVELOPMENT

- 5.1 The proposed development seeks the construction of a new Special Educational Needs (SEN) School, to accommodate Ysgol Plas Brondyffryn (YPB), which is currently split across three separate sites within Denbigh.
- 5.2 The new School site presents an excellent opportunity to bring together pupils with more specialised needs into a single flexible building with a clear shared ethos.
- 5.3 The specialist needs of the YPB pupils has been central to the design of this scheme. As such, the design principles strive to create a learning environment which will reduce anxiety and encourage calm, respond to heightened senses and provide a safe and functional teaching environment.
- 5.4 The proposed development is set out in detail in the separately submitted Design and Access Statement. This Chapter will provide an overview of the proposed development and key planning considerations to its design.

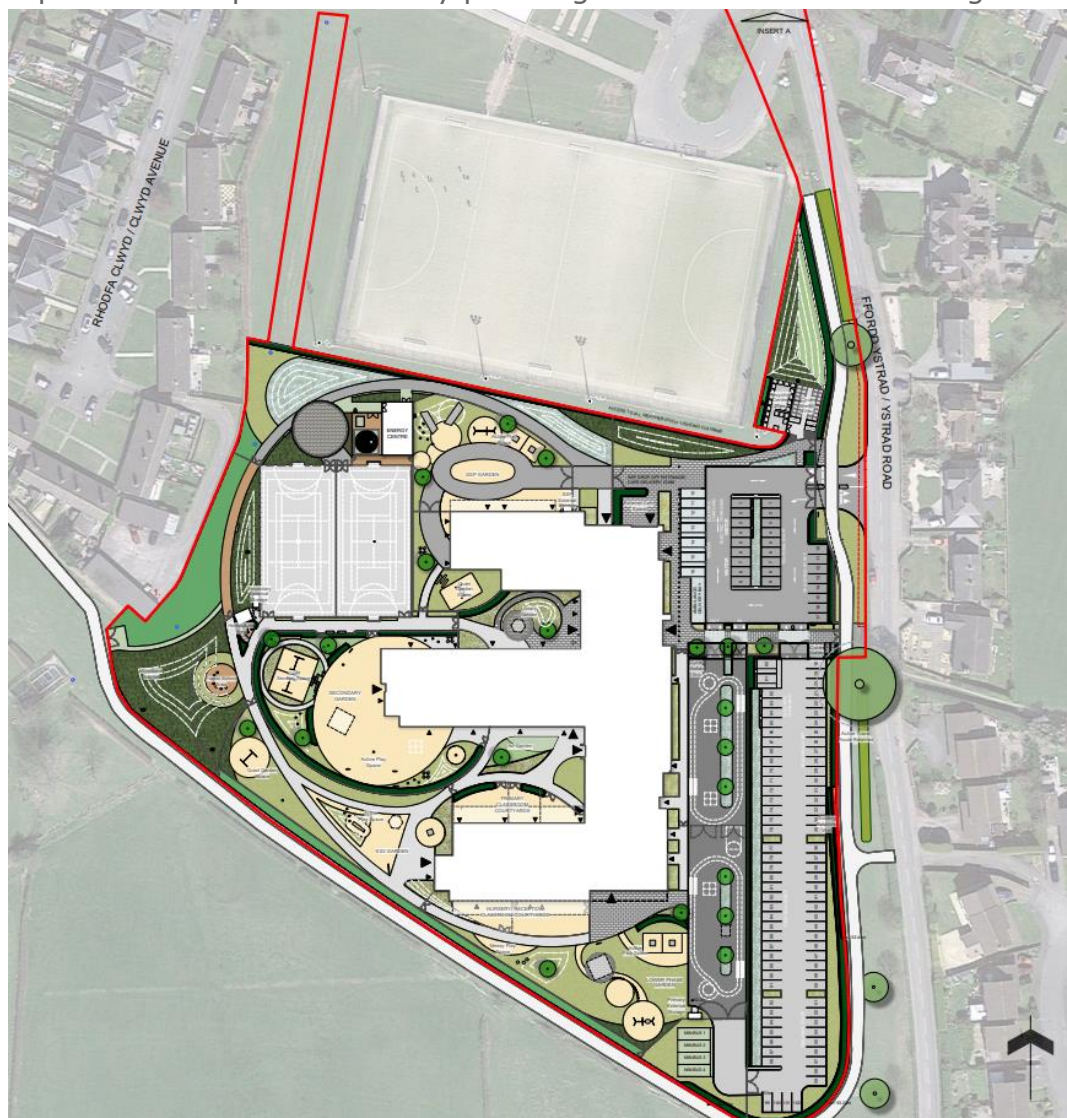


Fig. 3 Proposed Site Layout

SITE LAYOUT

- 5.5 Figure 3 sets out the proposed layout and landscaping of the School site, which comfortably accommodates the required facilities, both internal and external.
- 5.6 As set out within Figure 3, the site is accessed off Ystrad Road, where there is an internal vehicular access which routes into the site to the vehicular parking, drop off / pick up point. The internal route extends through to the Multi-use Games Areas (MUGA's) and around the perimeter of the site to facilitate service access.
- 5.7 The site has been designed with the principal aim to ensure the safety and welfare of the pupils, with their specialist needs central to this vision. Accordingly, the School site is separated into three distinct zones, 'secure area', 'controlled' and 'publically accessible'.

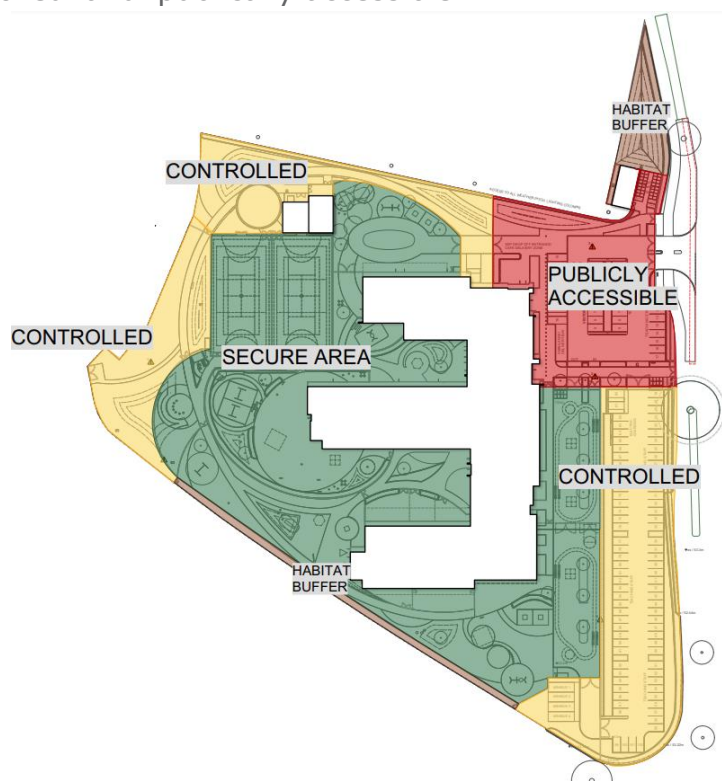


Fig. 4 Secure Line / Access Control

- 5.8 The position of the building and community aspects of School, such as the community café and MUGA's at the 'Public front' creates a sense of place and facilitates the separation of the community aspect from the secure School site.
- 5.9 The landscape design development has followed extensive analysis of the site and surrounding area.
- 5.10 The accompanying Design and Access Statement sets out the site layout / landscape design in detail.

VEHICLE PARKING

- 5.11 As outlined within Figure 3, and detailed within the Access and Circulation plan prepared by Ares, the development at this site would provide a suitable level of vehicle parking, including EV charging, mini bus provision, stationary drop off, cycle parking and motorbike parking.
- 5.12 Whilst this has been designed in line with Denbighshire Council's Parking Standards, due to the specialist nature of the school, vehicle parking is higher than typically expected, with a higher staff to pupil ratio and specialist staff typically commuting further. This is defined in Chapter 3.

SPORTING FACILITIES

- 5.13 The two MUGA's situated at the North-western corner of the site represent an all-weather provision on site which is suitable for a wide variety of sports.
- 5.14 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.
- 5.15 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.
- 5.16 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 (Fig 4).
- 5.17 Taking on board comments from the Planning Officer at the pre-application stage, the MUGA's have been moved 2m South and 1m East of the original position. An acoustic fence has also been introduced along the Northern and Western MUGA edge (2.4m / 3m high).
- 5.18 In light of these mitigation measures, the Noise Assessment undertaken by Stroma concludes that the noise levels would be considered acceptable, when restricted to daytime use which does not exceed 18:00. This is the intention and the MUGA's are not proposed to be floodlit.
- 5.19 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.
- 5.20 This aspiration is acknowledged and in response, enhancements to the field south of Middle Parc are being explored in line with the proposed

development. 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.

COMMUNITY USE

- 5.21 In addition to the community use of the sporting facilities, the proposals include a Community Café which will be multi-purpose, providing opportunity for pupils to have some work experience, providing a service / resource for other community groups, whilst being open for pupils at neighbouring Denbigh High.
- 5.22 It is anticipated that the community café is to be open week days, with the potential for opening during school holidays.

SCHOOL BUILDING DESIGN

- 5.23 The separately submitted Design and Access Statement sets out the proposed building design in detail.
- 5.24 The proposal is a new reversed E-shaped 2 storey teaching building, with one wing to the Northern end being single storey.
- 5.25 The E-shaped building has been designed to create clear secure zones for the Primary & Early Years, SSP, Secondary and Sixth Form teaching bases.
- 5.26 The external elevations of the building were carefully designed with consideration to local vernacular of grey brick, with green cladding to complement the surrounding landscape.



Fig. 5 Concept Visualisation



Fig. 6 Concept Visualisation

6.0 PRE-APPLICATION CONSULTATION EXERCISE

- 6.1 Following the enactment of the Planning (Wales) Act 2015, the requirement for pre-application consultation on major development was implemented.
- 6.2 The statutory requirement to consult is imposed by Section 61Z of the Town and Country Planning Act 1990.
- 6.3 Pre-application consultation exercises must include:
- Making draft planning application documents available to view;
 - Notifying the right consultees of the consultation;
 - Providing a 28 consultation period; and
 - Reporting how the pre-application consultation was undertaken and how people's views were considered in a 'Pre-Application Consultation Report' submitted as part of the application.
- 6.4 A pre-application consultation exercise is being undertaken in line with these requirements prior to submission of a planning application. This will consult a variety of statutory and non-statutory consultees, who will be invited to make comment.

STATUTORY CONSULTEEES

- Adjoining Owners & Occupiers (letter drop)
- Denbigh Town Council
- Ward Member(s) – Denbigh Lower
 - Councillor Rhys Thomas
 - Councillor Mark Young
- Councillors – Denbigh Caledfryn Henllan
 - Councillor Pauline Edwards
 - Councillor Delyth Jones
 - Councillor Geraint Lloyd-Williams

SPECIALIST CONSULTEEES

- Denbighshire County Council Highways Department
- Denbighshire County Council Rights of Way Officer

- Denbighshire County Council Biodiversity Officer
- Denbighshire County Council Health, Safety & Wellbeing Officer
- Denbighshire County Council Drainage & SAB Officer
- Denbighshire County Council Public Protection Officer
- Sport Wales
- Natural Resources Wales
- Welsh Water
- Denbighshire Historical Society

NON-STATUTORY SPECIALIST CONSULTEES

- Chair of Governors (Denbigh High School)

PRE-APPLICATION CONSULTATION REPORT

- 6.5 The details of this exercise, including representations made and a summary of responses will be set out within the Pre-application Consultation Report, which will be submitted with the Planning Application.

7.0 NATIONAL PLANNING POLICY

- 7.1 Planning Policy Wales Edition 11 (PPW) was published in February 2021. PPW sets out the Welsh Assembly Government's planning policies for Wales and how these should be applied. This provides local government with the guidance to prepare their own local development frameworks and guidance in decision making.
- 7.2 Future Wales: The National Plan to 2040 applies the key principles of PPW and establishes how Wales should develop and grow.
- 7.3 Alongside the PPW and Future Wales sits 24 Technical Advice Notes (TAN), which form planning guidance at a national level on various topics.
- 7.4 This section will set out a summary of national planning policy guidance taken from PPW and the TAN documents.

PLANNING POLICY WALES

- 7.5 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.
- 7.6 A plan-led approach is the most effective way to secure sustainable development through the planning system and it is essential that plans are adopted and kept under review. Legislation secures a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise, to ensure that social, economic, cultural and environmental issues are balanced and integrated.
- 7.7 The planning system should be efficient, effective and simple in operation. It is not the function of the planning system to interfere with or inhibit competition between users of and investors in land. It should not discriminate against or favour any particular group or members of society.
- 7.8 Figure 7 of PPW sets out how proposals should be prepared within the context of key planning principles of the planning system, this is included below (Figure 7).

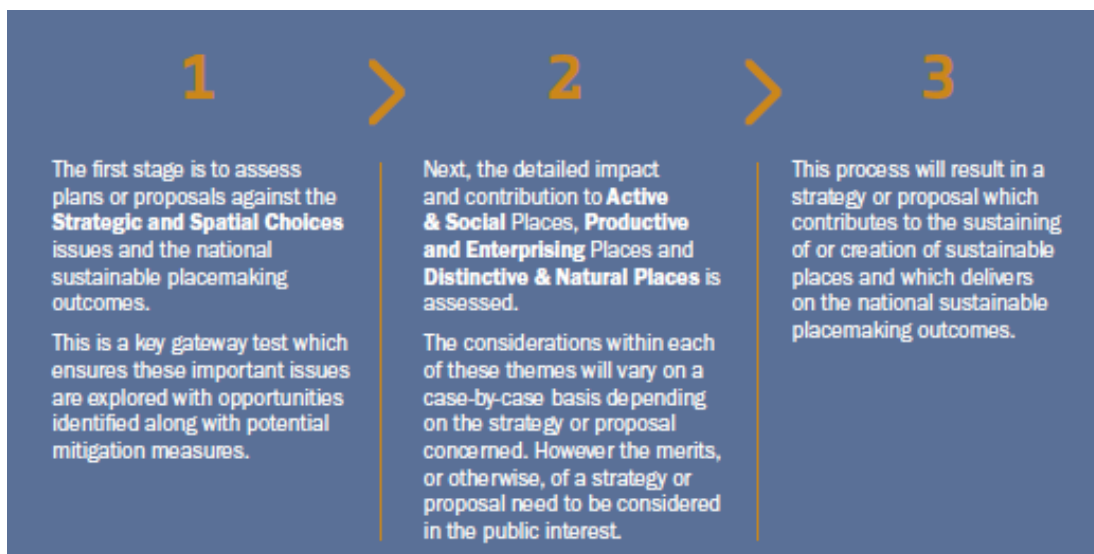


Fig. 7 PPW Extract



Fig. 8 PPW Extract

7.9 **Paragraph 3.5** states that

“Good design is inclusive design. Development proposals should place people at the heart of the design process, acknowledge diversity and difference, offer choice ... provide for flexibility in use and provide buildings and environments that are convenient and enjoyable to use for everyone.”

7.10 **Paragraph 3.6** proceeds to state that proposals must address issues of inclusivity and accessibility, making provision to meet specialist needs, including learning impairments.

- 7.11 **Paragraph 3.6.1** proceeds to highlight that adequate and efficient infrastructure – including services such as education - is crucial for economic, social and environmental sustainability.
- 7.12 **Paragraph 3.7** asserts that developments should seek to maximise energy efficiency and the efficient use of other resources. **Paragraph 3.8** sets out that good design can help to ensure high environmental quality.
- 7.13 **Paragraph 3.9** highlights that the special characteristics of an area should be central to the design of a development. **Paragraph 3.10** proceeds to state that in areas recognised for their particular landscape, townscape, cultural or historic character it can be appropriate to seek to promote or reinforce local distinctiveness.
- 7.14 **Paragraph 3.11** highlights the importance of crime prevention and the fear of crime, stating that the aim of development should be to produce safe environments that do not compromise on design quality in accordance with the cohesive communities’ well-being goal.
- 7.15 **Paragraph 3.12** highlights the importance of safe, sustainable links within and between developments.
- 7.16 **Paragraph 4.1.50** states that a design-led approach to the provision of car parking should be taken, which ensures an appropriate level of car parking - contextually informed - is integrated in a way which does not dominate the development.
- 7.17 **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.
- 7.18 **Paragraph 4.5.1** sets out that recreational spaces are vital for our health, well-being and amenity.
- 7.19 **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.

7.20 **Paragraph 5.7.12** states that the Welsh Government expects all new development to mitigate the causes of climate change in accordance with the energy hierarchy for planning.

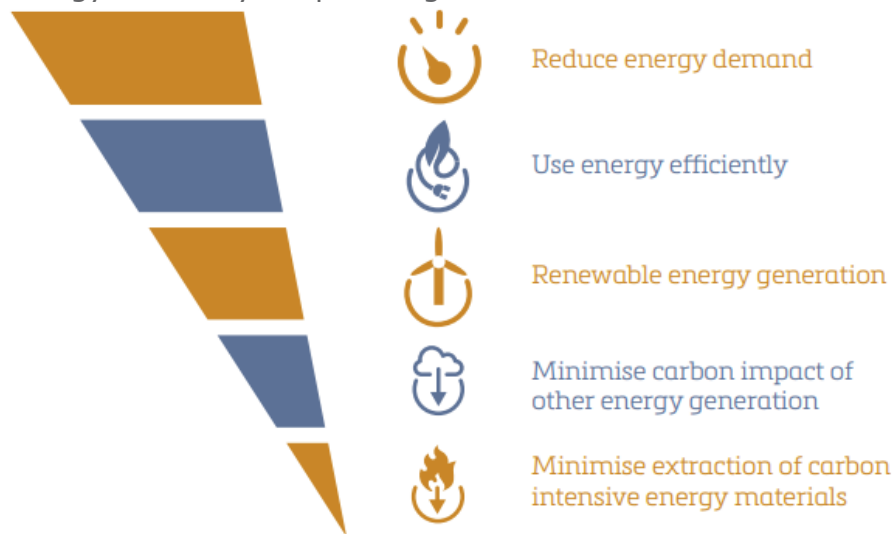


Fig. 9 PPW Extract, Energy Hierarchy for Planning

7.21 **Paragraph 5.8.1** asserts that the planning system should support new development that has very high energy performance, supports decarbonisation, tackles the causes of the climate emergency, and adapts to the current and future effects of climate change through the incorporation of effective mitigation and adaptation measures.

7.22 **Paragraph 6.2.4** states that green infrastructure plays a fundamental role in shaping places and our sense of well-being, and is intrinsic to the quality of the spaces we live, work and play in.

7.23 **Chapter 6.3** relays the value of the landscapes of Wales, which are rich and varied. **Paragraph 6.3.3** highlights that the landscapes of Wales are valued for their intrinsic contribution to a sense of place, and local authorities should actively protect and enhance their special characteristics.

7.24 ***It is presented that the proposed development is supported by PPW as it seeks to deliver upon a need for a specialist educational facility, whilst making a positive contribution to the wider community and local landscape.***

FUTURE WALES: THE NATIONAL PLAN TO 2040

7.25 Future Wales is a 20 year framework for planning the change and development of Wales to 2040, with a strategy for addressing key national priorities through the planning system, including sustaining and developing

a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities.

- 7.26 Future Wales identifies that our economy is becoming increasingly service-based, with the fastest growing sectors 2008-2018 inclusive of education.
- 7.27 Future Wales sets out 11 ambitions / outcomes, supported by 36 specific policies.
- 7.28 **Outcome 9** states the priority for places to sustainably manage their natural resources and reduce pollution, highlighting that Wales' natural resources, including its minerals, soils and geodiversity, coast, water, forests and landscape support a range of activities and sectors and are assets of great value in their own right.
- 7.29 **Outcome 10** sets out the intention to protect and create places with biodiverse, resilient and connected ecosystems. While biodiversity has declined in recent decades, we will reverse these losses and enhance the resilience of ecosystems.
- 7.30 **Outcome 11** defines the decarbonisation agenda and the intention to promote and deliver a competitive, sustainable decarbonised society.
- 7.31 **Policy 12 – Regional Connectivity** sets out the Welsh Government's priority to support and invest in improving regional connectivity, including improving and integrating active travel.
- 7.32 **Policy 17 – Renewable and Low Carbon Energy and Associated Infrastructure** highlights that in determining planning applications for renewable and low carbon energy development, decision-makers must give significant weight to the need to meet Wales' international commitments and our target to generate 70% of consumed electricity by renewable means by 2030 in order to combat the climate emergency.
- 7.33 **Policy 21 – Regional Growth Area – North Wales Coastal Settlements** identifies Rhyl and Prestatyn as part of the Regional Growth Area. It is expected that new key facilities should be located in identified growth areas.

TECHNICAL ADVICE NOTES

- 7.34 Technical advice notes (TANs) provide detailed planning advice. Local planning authorities take them into account when they are preparing development plans. Of those available, the most pertinent to the proposal are as follows:

Technical Advice Note 5 – Nature Conservation (2009)

Technical Advice Note 12 – Design (2016)

Technical Advice Note 15 – Development and Flood Risk (2004)

Technical Advice Note 16 – Sport, Recreation and Open Space (2009)

Technical Advice Note 18 – Transport (2007)

TECHNICAL ADVICE NOTE 16

- 7.35 Technical advice note 16 sets out detailed guidance in relation to sport, recreation and open space. This is the most pertinent to this proposal and is therefore considered in further detail below.
- 7.36 The guidance sets out the priority to protect and enhance existing sport and recreation facilities and open spaces.
- 7.37 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.

8.0 LOCAL PLANNING POLICY CONTEXT

INTRODUCTION

- 8.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications must be determined in accordance with the development plan unless material considerations of which PPW, together with emerging development plans, indicate otherwise.
- 8.2 The current Development Plan relevant to this site is comprised of the Denbighshire County Council Local Development Plan 2006-2021 (adopted June 2013).
- 8.3 Denbighshire are currently in the process of preparing a new Local Plan, which is currently at the first formal stage of preparation, 'Pre-Deposit'.
- 8.4 The Local Development Plan written policies document is supported by the Proposals Map. The relevant extract is included below (Figure 10).

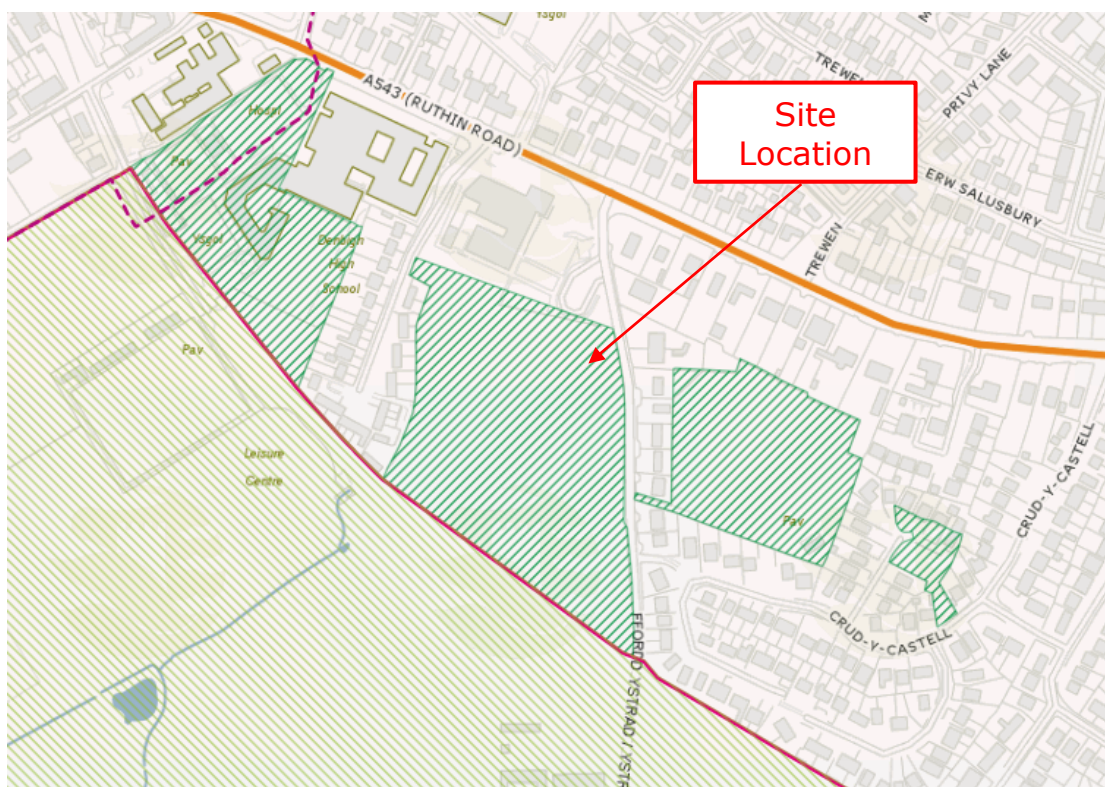


Fig. 10 Proposals Map [Source: Denbighshire County Council]

- 8.5 As indicated above, on the Local Plan Proposals Map the site is allocated within the Development Boundary (**Policy RD1**). As such, development is supported within the development boundary subject to sustainable development and good design standard criteria. The southern aspect of the

site is adjacent to this boundary line with the Green Barrier (denoted in pink).

8.6 **Policy RD5 – The Welsh language and the social and cultural fabric of communities**, states that in determining all planning applications, the needs and interests of the Welsh language will be taken into account. Development could be refused if its size, scale or location would cause significant harm to the character and language balance of a community.

8.7 The site is also 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."

8.8 **Policy BSC3 – Securing Infrastructure Contributions from Development**, states that where relevant, development will be expected to contribute to the provision of infrastructure to meet the additional social, economic, physical and/or environmental infrastructure requirements arising from the development.

8.9 **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.

8.10 **Policy VOE5 – Conservation of Natural Resources**, sets out that;

"Planning permission will not be granted for development proposals that are likely to cause significant harm to the qualifying features of internationally and nationally designated sites of nature conservation, priority habitats, priority species, regionally important geodiversity sites, or to species that are under threat."

8.11 **Policy VOE6 – Water Management**, highlights that all development will be required to eliminate or reduce surface water run-off from the site, where practicable. The run-off rates from the site should maintain or reduce pre-development rates. Further to this, all major development proposals should be accompanied by a Water Conservation Statement.

8.12 **Policy VOE10 – Renewable Energy Technologies**, sets out that;

"Development proposals which promote the provision of renewable energy technologies may be supported providing they are located so as to minimise visual, noise and amenity impacts and demonstrate no unacceptable impact upon the interests of nature conservation, wildlife, natural and cultural heritage, landscape, public health and residential amenity."

8.13 **Policy ASA3 – Parking Standards**, states that development proposals will be expected to provide appropriate parking spaces for both vehicles and bicycles.

9.0 OTHER MATERIAL CONSIDERATIONS

FLOOD RISK

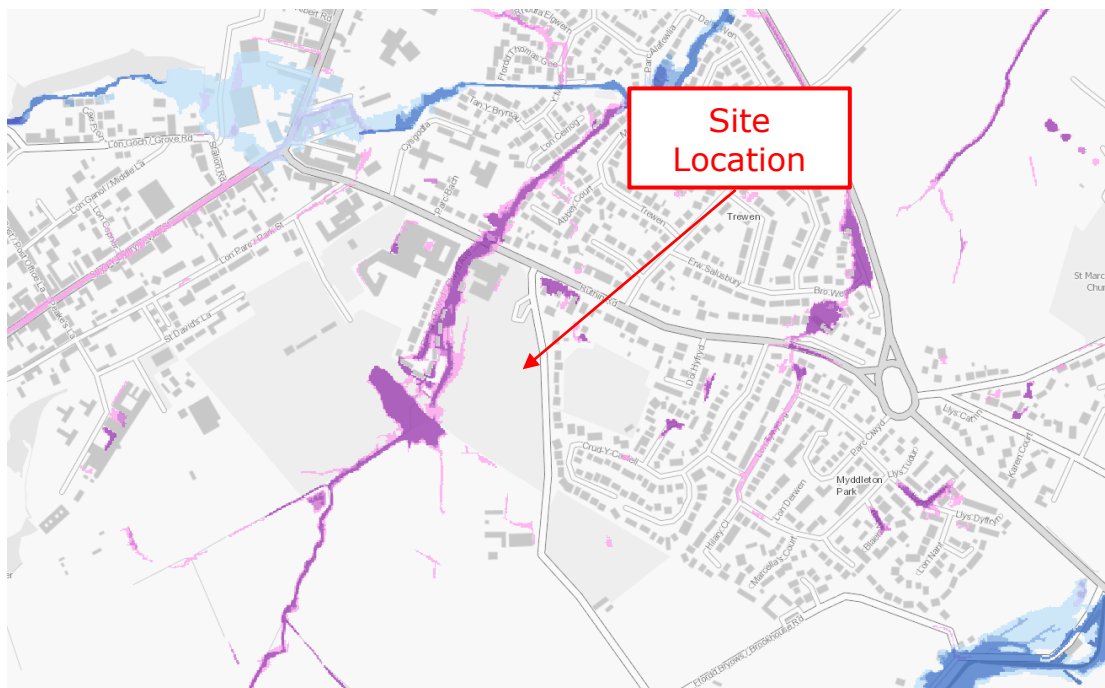


Fig. 11 Flood Risk Map [Source: Natural Resources Wales]

- 9.1 As demonstrated by Figure 11, the site is located predominantly in a very low flood risk area, however there is some increased risk along the western boundary.
- 9.2 The Flood Consequence Assessment prepared by Curtins concludes that the source of the flood risk to the site is pluvial flooding from the existing culverted watercourse, in the event of a blockage at the existing headwall to the South. Where the culvert is operating normally there is sufficient capacity to manage the flows from the watercourse.

DRAINAGE

- 9.3 The Drainage Strategy prepared by Curtins details the existing and proposed foul and surface water drainage strategy for the site.
- 9.4 Discharge to a watercourse is the main proposal for surface water drainage. To attempt to replicate the existing greenfield drainage of the site, it is proposed that the site discharges surface water to the culverted watercourse via a flow restriction.

- 9.10 The Heritage Impact Assessment prepared by Henderson Heritage concludes that the site is unlikely to be included in the Conservation Area, as it is sufficiently distant from the historic core that contributes to the conservation area's character or appearance.
- 9.11 The Heritage Impact Assessment considers all heritage assets within the wider surrounding area and notably the views to / from the site and these assets.
- 9.12 The Assessment confirms that the proposed development would not have a detrimental impact on the setting of Denbigh Castle. The tree cover around the castle allows it to be well screened in summer and in winter and therefore the views to and from the castle to the site will not be affected.

ARCHAEOLOGY

- 9.13 Archaeology Wales prepared a Desktop Archaeological Appraisal, which states that the land appears to have always been used for arable farming since the first maps of the area. No evidence of potential sub-surface features have been evidenced during the production of the report. It is recommended that a watching brief is carried out during groundworks to prove the presence/absence and character of any remains that might be on site.
- 9.14 The report also states that the site is within the registered Historic Landscape of Vale Clwyd. It is concluded that providing the scheme is sympathetic to the Old Town Conservation area of Denbigh the proposed development will not have a negative impact upon the registered landscape.
- 9.15 The Appraisal concludes that whilst there are views to the site from Denbigh Castle, direct lines of sight are limited by the presence of tree cover and vegetation acting as soft screening.

ECOLOGY

- 9.16 The Preliminary Ecological Appraisal undertaken by Indigo Surveys concludes that the site offers very low value habitat.
- 9.17 The scattered trees and hedges provided nesting opportunities for birds however it is considered that the proposals are unlikely to affect these habitats. In ensuring this, it is recommended that any tree or vegetation removal works should be undertaken outside the period 1st March to 31st August inclusive. If this time frame cannot be avoided a close inspection of vegetation/hedges and trees should be undertaken prior to felling.

- 9.18 Whilst it is identified that the existing frontage hedge is to be removed, a more significant extent of hedgerow is proposed, which will be of better quality and thus a higher biodiversity value.
- 9.19 It has been the intention of the design team to deliver a net gain in biodiversity value in delivering the strategic development of the site.

HIGHWAYS

- 9.20 Curtins as Highway Consultants, have produced a Transport Assessment and Travel Plan in relation to the proposed development, concluding that safe access can be attained to and from the site.
- 9.21 The supporting documentation concludes that the site is located within an area which has a range of existing local facilities and sustainable travel choices, and is an existing established school.

ACOUSTICS

- 9.22 A Noise Impact Assessment has been undertaken by Stroma which concludes that noise levels would be within the acceptable limits, on the basis that the MUGA's have been repositioned, moving 2m to the South and 1m to the East of the original position. An acoustic fence has also been introduced along North and West MUGA edge (2.4m / 3m high).

SPORTS PITCH / PLAYING FIELDS LOSS

- 9.23 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.
- 9.24 The guidance 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
- 9.25 Sport Wales have engaged in initial dialogue and will be consulted as part of the Pre-application Consultation Exercise.

- 9.26 Whilst Sport Wales do not have publically accessible criteria for assessing proposals affecting playing fields, it is expected that a similar approach will be taken as for Sport England.
- 9.27 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.
- 9.28 It is submitted that there is considerable comparable provision of playing fields in the immediate surrounding area and as such the proposals meet this exception.
- 9.29 It is also presented that the proposed development incorporates the provision of two Multi-use Games pitches, which represent an alternative provision of comparable quality, despite the reduced land area.
- 9.30 The separately submitted [Site Justification Statement](#) concludes that the proposed development would not result in an unjustified loss of playing field and the associated compensatory provision would represent an enhancement of existing sporting facilities provision.

NET CARBON ZERO

- 9.31 In line with the wider 'Net Zero Wales' agenda, Planning Policy Wales supports new development that has very high energy performance, supports decarbonisation, tackles the causes of the climate emergency, and adapts to the current and future effects of climate change through the incorporation of effective mitigation and adaptation measures.
- 9.32 For the proposed development a whole life carbon assessment will be undertaken, with BREEAM Excellent and EPC A targets. Carbon impacts of products and construction processes will also be strictly measured, in line with the developments 'Net Carbon Zero' objective.

TREES

- 9.33 Whilst there are no trees on the site itself, there are a number of boundary trees.
- 9.34 A Tree Constraints Assessment and Arboricultural Impact Assessment has been undertaken by Indigo Surveys

- 9.35 The most notable tree, based on individual prominence, lack of significant defects, current contribution and future potential, is categorised 'A - high'. It is recommended that T3 be retained and protected, along with a mature Oak tree to the school entrance and a number of other category B trees to the boundaries.
- 9.36 Tree protection measure will be put in place and works within the root protection areas carried out in accordance of the method statement

10.0 PLANNING APPRAISAL

- 10.1 **Main Planning Considerations** - It is considered that the main planning considerations to be taken into account in relation to this application are:
- Principle of Development
 - Open Space and Recreation
 - Design and Amenity
 - Environmental Considerations
 - Accessibility, Transport and Car Parking
 - Welsh Language Impact
- 10.2 **Principle of Development** - The proposed development represents the provision of a new Ysgol Plas Brondyffryn SEN School, to facilitate the co-location of three existing sites within the town of Denbigh, in response to rising demand for pupil places in the area. With this in mind, the proposal is in accordance with Policy BSC12 of the Denbighshire Local Plan and Paragraph 3.6.1 of PPW, supporting access to an essential educational facility.
- 10.3 Policy 21 of Future Wales states that new key facilities should be located in identified growth areas, such as Rhyl and Prestatyn. Notwithstanding this, the proposed development does not represent a new key facility, it seeks to co-locate an existing provision which is currently split across three separate sites in Denbigh.
- 10.4 Further to this, Denbigh has been identified as the most rational location for the new School site, with the existing three sites located within the town, which is a Central point to the County, therefore limiting pupils travel time within the catchment. Further detail is provided on the rationale for the site selection within Denbigh in the separately submitted Site Justification Statement.
- 10.5 Whilst it is acknowledged that the Regional Growth Area is preferred for new key facilities due to the accessibility via a range of transport options, due to the specialist nature of the School and its pupil's needs, public transport will not be a feasible option of travel for a majority of pupils, for which County organised learner transport services are provided. Notwithstanding this, the Application site is accessible via sustainable transport modes and such methods will be encouraged wherever possible. The site is accessible via a range of bus routes and a considerable level of cycle parking is proposed to be provided on site.
- 10.6 **Open Space and Recreation** – Whilst it is acknowledged that the current use of the site is a sports pitch, it is presented that the proposed development would not represent an unjustified loss of playing fields in line with the Welsh Government guidance. 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 control of Denbigh High and is being explored for sporting facility enhancements, in line with the *Community Use Spec.*

- 10.7 The proposed development delivers upon an enhanced facility for Ysgol Plas Brondyffryn, whilst providing opportunities for wider community use, including the MUGA's, café and the wider enhancements to the Denbigh High field South of Middle Parc. The provision of the Multi-use Games pitches is considered to represent an enhanced quality in comparison to the current field, of which there is considerable comparable provision in the locality. The enhancements to the field South of Middle Parc represent a notable qualitative improvement, accommodating a wider range of sports. On this basis, the proposals are in accordance with Paragraph 4.5.1 and 4.5.4 of Planning Policy Wales and TAN 16, which identifies that redeveloping open space to provide alternative provision can often represent better value for communities.
- 10.8 It is therefore considered that the development of this land to support the provision of a specialist education facility does not represent a material loss when considered in the wider context. Further to this, the development of the land to provide an educational facility in particular demand is wholly acceptable and appropriate. On this basis, the proposed development is in accordance with Policy BSC11 of the Local Plan.
- 10.9 Further commentary is provided on the sporting provision within the separately submitted Site Justification Statement.
- 10.10 **Design and Amenity** - The Character of the area is defined by the location of the site within the historic town of Denbigh. The proposed development will reinforce this local character, whilst introducing a purpose built facility catering for the School's modern requirements. As such, the proposed development is in accordance with Paragraph 6.3.3 of PPW.
- 10.11 A comprehensive design process identified build materials which coordinate with the local vernacular whilst sympathetically responding to the local landscape. The proposal responds positively to the existing character of the area and hence represents good design as defined within PPW, namely Paragraph 3.9.
- 10.12 The proposed development has been designed central to the specialist needs of YPB pupils and as such, is in accordance with Paragraph 3.5 and 3.6 of PPW.
- 10.13 **Environmental Considerations** – The site is an existing playing field and as such is not of high biodiversity value. The Ecological Appraisal undertaken by Indigo Surveys concludes that the scattered trees and hedges provided nesting opportunities for birds however it is considered

that the proposals are unlikely to affect these habitats. As such, the proposal does not cause detriment to biodiversity and is therefore in accordance with Policy VOE5 of the Local Plan and Outcome 10 of Future Wales.

- 10.14 A detailed surface water drainage strategy has been prepared by Curtins and looks to replicate the existing Greenfield run off through the use of SUDs. On this basis, the development of the site would ensure compliance with Policy VOE6, Water Management.
- 10.15 For the proposed development a whole life carbon assessment has been undertaken, with BREEAM Excellent and EPC A targets. Carbon impacts of products and construction processes will also be reviewed, in line with the proposals Net Carbon Zero objective. The local sourcing of materials and labour will contribute to this embodied carbon minimisation. On this basis, the proposal meets PPW Climate Change intentions, namely Paragraph 3.7, 3.8 and 5.8.1, the wider 'Net Zero Wales' agenda. Supporting the wider decarbonisation agenda, the proposed development is therefore in accordance with Outcome 9, Outcome 11 and Policy 17 of Future Wales.
- 10.16 The construction materials required will - where possible - be sourced locally and it is expected that local craftsman will be utilised. As such, the proposed development seeks to protect and make efficient use of local and natural resources in accordance with PPW, Environmental Sustainability principle.
- 10.17 The site layout has been designed with a central focus to incorporate green infrastructure, such as woodland habitat, forest school area and landscape buffers, whilst prioritising specialist SEN School requirements. As such, the proposals are in accordance with Paragraph 6.2.4 of PPW and thus contribute towards the principle of creating distinctive and natural places.
- 10.18 **Accessibility and Car Parking** - Given the nature of the proposals, the majority of pupils will be travelling via County organised learner transport (taxi, minibus or private motorcar) as set out in Chapter 3. Nevertheless, sustainable transport methods will be encouraged where possible for both students and staff. This will be supported by the surrounding walking, cycling and public transport infrastructure. The extent of vehicles at drop off / pick up has been central to development of the site layout, to ensure safety and efficiency in accommodating for pupils specialist vehicles. On the basis of the above it is clear that the proposed development is compliant with Paragraph 3.12 of PPW.
- 10.19 Whilst the parking provision proposed on site has been designed in consideration of Denbighshire Council's Parking Standards, due to the specialist nature of the school, this has also been defined in line with the specific requirements of YPB as the end user. Vehicle parking is higher than typically expected, with a higher staff to pupil ratio and specialist staff

typically commuting further. This is defined in Chapter 3. On this basis, the proposed development is in accordance Paragraph 4.1.50 of PPW which sets out that an appropriate level of car parking for development should be *contextually informed*.

10.20 Following initial discussions with Denbighshire County Council Highways Department, further improvements to surrounding accessibility have been considered and are included within this application. Curtins Transport Assessment presents two potential options to improve the active travel route around the Leisure Centre junction. With this in mind, the proposals are aligned Policy 12 of Future Wales which sets out the Welsh Government's priority to support regional connectivity, including improving and integrating active travel.

10.21 **Welsh Language Impact** - In preparing the proposed development, due consideration has been given to any effects of the proposal on the Welsh language. We consider that the proposal provides an opportunity to promote the use of the Welsh language as well as introduce a range of social and economic benefits to the area. This is set out in detail in the separately submitted Community Linguistic Impact Assessment. On this basis, the proposed development is compliant with Policy RD5 of the Local Plan.

11.0 CONCLUSIONS

- 11.1 Cassidy and Ashton make this Full Planning Application on behalf of Wates Construction, developing this project for Denbighshire County Council.
- 11.2 The proposed development seeks the construction of a new Special Educational Needs School, co-locating three existing sites of Ysgol Plas Brondyffryn, each within Denbigh.
- 11.3 Consideration has been given within this document to a range of matters concerning the principle of development; open space and recreation; design and amenity; environmental considerations, accessibility and car parking and the Welsh language.
- 11.4 This Statement concludes that the proposed development represents the delivery of a community facility which is fundamental to the ongoing effective operation of Special Educational Needs education in the County.
- 11.5 It is acknowledged that the proposed development site is an existing playing field used in association with Denbigh High School, however it is clear that the compensatory measures, (i.e. provision of the MUGA's / enhancements to the field South of Middle Parc) mitigate this loss and represent an alternative provision which is of greater community benefit.
- 11.6 The separately submitted Site Justification Statement (including Sequential Site Assessment) concludes that Denbigh is the most suitable location for the proposed development. Further to this the Statement concludes that the proposed site is the most suitable for development and represents the less significant loss to community assets when considered in the context of all other available sites in the area.
- 11.7 The separately submitted Design and Access Statement sets out the design process in detail, defining the detailed design of the proposals, which have sought to complement the local vernacular and natural landscape.
- 11.8 This Statement, read in conjunction with the planning application pack as a whole presents the proposed development in detail, which has been designed with the central aim to achieve a learning environment which is safe, suitable and inviting for its pupils, whilst accommodating the growing demand for pupil places.

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