

[REDACTED]

From: Pete Douthwaite [REDACTED]
Sent: 06 April 2020 18:5
To: Wales
Subject: Reference : APP/H6955/A/19/3238470 Holt Road
Attachments: flood drainage dean road.pdf; IMG-20191006-WA0008.jpg; IMG-20191006-WA0007.jpg; IMG-20191006-WA0006.jpg; IMG_20191030_0004.pdf; IMG_20191030_0003.pdf; IMG_20191030_0002.pdf; LDP site register front page.pdf; Dean Road.pdf

Town and Country Planning Act 1990 Appeal by Glyndwr University Site Address:

Land North of Holt Road , Wrexham, LL13 9EH

Sir /Madam,

I wish to object strongly to the proposed development.

If I may firstly give you some background to my objections.

I moved with my parents and siblings to Bryn Estyn Road in 1971. I was six at the time. From the age of about 9 or 10 I can remember playing on Dean Road field. There used to be a hockey pitch nearest the car park, a football pitch, a concrete cricket wicket and a rugby field. Nobody ever told us we could not go on the field.

I used to play football on there with my twin brother and friends. I also played cricket on there with friends from Alexandra Junior School where I was attending at the time. This must have been 1976/77 as I left to go to St David's Senior School in 1977.

I would regularly play on the field at evenings and weekends with friends from St David's School from 1977 onwards.

In 1978 through to 1981 my dad along with some other parents set up a youth football team called Rhosnesni FC. We played in the Under 14s Wrexham and District Youth Football League. We played all our home matches on Dean Road. We played a number of other teams from around the Wrexham area. Around 1982 I recall a club called Borrass Park Albion were set up in the youth football league. I believe they played at Dean Road from about 1996 and every season from then until now.

On leaving school I played football in the local senior Welsh National and Sunday leagues until about 2000. I know that Borrass Park Albion seniors also used Dean Road for a number of years for their home matches.

Around 1998 I played Sunday football for The Oak Tree, a local pub team who played in the Marston's Sunday league; they used Dean Road as their home ground for the next two seasons.

In 2011 my son joined Borrass Park Albion under 7s who trained at Dean Road on a weekday evening and then played on Dean Road on either a Saturday or Sunday morning. He played for BPA through until 11s - always training at Dean Road when daylight allowed and playing home matches on either a Saturday or Sunday morning.

I managed the team from under 9s level through to under 11 and there were regularly 4 matches being played simultaneously along the whole length of Dean Road with upwards of 80 kids partaking and parents' cars spilling out on to Dean Road and down Rhosnesni Lane

So from my personal experience there has been football played at some level for at least 37 years from 1978 to 2015.

There are therefore literally thousands of children who have played football on that field over the last 40 years.

The use of the site by the local junior football team is being underplayed by the planning officer and by Glyndwr – Borrass Park Albion have used the field for about 25 years – well before it was in Glyndwr University ownership.

Where will kids play football if they are denied the right to do so by Glyndwr University?

They can't use the closest facilities at Acton Spider Park on Rhosnesni Lane because there are only 2 pitches available and they are already used by Borrass Park FC under 12 to under 16 age groups.

There would be nowhere for these children to play. There is good reason why Sports Council for Wales and Wrexham Council Parks & Rights of Way Department object to the proposals.

Glyndwr University are supposed to be educating our future generations but are in fact actively discouraging children from healthy exercise.

Living locally, I also used the pedestrian gate into Dean road playing field of the Holt Road regularly.

If there was no public right of access to the field then why was there a pedestrian gate installed? Why is there a tarmac apron from the footway leading to the pedestrian gate into Dean Road playing field ? It was put there to serve pedestrians / cyclists coming off the field. The pedestrian crossing was installed where it is because of its proximity to the pedestrian gate. There has been public access to that field for at least 40 years to my knowledge.

Schoolchildren use the field as a shortcut to get to and from school - if its not available for use then kids will have to walk /cycle on the main Holt Road/ Dean Road where there is substandard facility and where traffic volumes will only increase if the development is given the go ahead.

The proposed replacement pitch is not on land under the control of the applicant – it belongs to Wrexham council and to my knowledge Wrexham Council have not agreed to sell or gift the land to Glyndwr for the development.

There is currently space for approximately 4 youth football pitches on the site which are being replaced with just one. How is that a fair trade off? Sports Council for Wales quite rightly objected.

Dedicating the new football field for sole use by Borrass PA prevents its use as amenity space by all local residents / dog walkers/ cyclists etc. Do Glyndwr have it within their powers to gift the land to Borrass FC for their sole use?

Glyndwr have proposed to retain a pitch in an attempt to satisfy CLF4.

Policy CLF 4 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.

This is clearly more than 'redevelopment of only a small part of the site' so doesn't meet with criteria a). Borras FC use it intensively on a weekly basis so it definitely doesn't satisfy criteria b) and there is no attempt to satisfy criteria c). Not one of the criteria is met.

Also, I can't see any provision for Public Open Space on the proposed housing site. 70 houses requires 5,600 square meters (see LPGN 10). But for a landscape buffer at site access (which doesn't count as useable open space) there isn't any. So there is no actual gain here in terms of outdoor facilities over what would be required normally.

The 2009 OSS identified the land as a playing field and concluded there was a deficiency in OS provision. POS review from 2009 shows a deficit in Acton of 4.964 ha Outdoor Sport and 8.703 ha playing fields. The situation has not improved to my knowledge.

The council however updated the survey in 2016 for the LDP and OS now includes things like roadside verges..... is a road side verge really open space? Would you let children play on a grassed verge? Would you go for a picnic on a grassed verge? Who came up with this ridiculous criteria for POS? The 2016 review didn't pick it up as sports pitches because there were no goalposts on there - the goal posts used by Borras FC are all stored in the changing rooms and are set up before each match.

The planning officers report says that the loss of amenity green space will not be detrimental to the amenity offered to the community. Really? How can the loss of such a huge amount of amenity green space not be detrimental to the amenity offered to the local community?

The area has been marked on maps dating back to at least 1958 as a playing field. (see attached plans)

Although drainage was not one of the reasons for refusal on this application I would respectfully request that the Inspector considers some pertinent issues. I believe that Wrexham Council's own Flood and Water Management officer has objected to the proposals on drainage grounds?

It is quite clear in DCWW response to the application that only foul sewerage from the proposed development can be accommodated within the public sewerage system. The planning officer however wilfully disregarded this advice and suggested without any evidence that a suitable system could be designed.

There is photographic evidence (attached) of significant recent flooding events on Holt Road, with manhole covers blown due to capacity problems. The application should clearly have been refused on drainage reasons as well and it is deeply concerning that any planning officer should seek to mislead the planning committee as happened in this instance.

I therefore suggest that in the absence of any proof that an adequate SW system can be designed that the application should be refused on grounds of an inadequate drainage system.

The Highway Assessment submitted by the Glyndwr shows that the roundabout at the junction of Holt Road / Cefn Road and Dean Road is already over capacity at the 2020 baseline. Observed queuing lengths at the roundabout greatly surpass what is presented within the report.

The addition of another 74 dwellings will only make existing queuing problems much worse at this roundabout. There are seriously substandard cycling and pedestrian facilities on the roundabout making crossing at peak times hazardous particularly for vulnerable adults and schoolchildren. The applicant is proposing nothing by way of mitigating the serious capacity issues at the roundabout. Clearly the proposed development would create additional danger to all highway users and exacerbate existing capacity issues.

Finally I am disturbed by the planning officers report to planning committee which ignores the advice of about 4 statutory consultees and blatantly contradicts planning policy.

The report itself is one sided but even worse is the attached email (flood drainage Dean Road) which is available on the Wrexham Council planning website and was sent by the planning officer (Phil Forster) to the Planning Control Manager (David Williams) and which utterly betrays the planning officers obvious bias towards the development.

The second paragraph states :

'...Welsh Water haven't stipulated that they won't accept surface water into the drain so there's nothing to say that they can't drain to the combined sewer at an attenuated rate. **I'll have to hang it on this.** It's just another nail in the coffin for the site'

Firstly the statement is incorrect as DCWW did stipulate that there was only foul water should be permitted into their system.

More concerning is the seemingly desperate measures that the planning department went to, in order to give support to the development. Should the planning officer writing the report (on behalf of the Chief Planning Officer) really be wilfully misleading the planning committee just to support the failing business

plan of Glyndwr University? One can only wonder what pressures the planning department were put under to support this development.

I therefore hope that I have provided enough justification for the application to be refused on the grounds of :

Inadequate highway capacity

Loss of public open space

Drainage

regards

Pete Douthwaite