

AINSLEY GOMMON ARCHITECTS
MR GWYN ROBERTS
THE OLD POLICE STATION
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CH5 3NS

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P/2014/0863 & P/2014/0888
13 January 2015
Philip Forster
01978 298786
philip.forster@wrexham.gov.uk

By email: GRoberts@ainsleygommonarchitects.co.uk

Dear Sir,

**REFURBISHMENT OF EXISTING SCHOOL BUILDING INCLUDING SOME NEW
BUILD AND ASSOCIATED EXTERNAL WORKS AND OUTLINE APPLICATION
FOR NEW SPORTS HALL AND TEACHING FACILITIES.
OLD SCHOOL SITE THE GROVES PENYMAES AVENUE WREXHAM**

I refer to the planning applications submitted in relation to the above mentioned planning proposals. I have now taken the opportunity to consider the proposals and I would like to make you aware of my observations. The comments below relate to both planning applications submitted on the site.

Ecology

Most importantly I have received comments from the Council's Ecologist and Natural Resources Wales. Bat roost assessments carried out by Wrexham County Borough Council in 2013 identified a bat roost (a number of droppings) and several potential roosting sites within the main girls school building. No further assessment or survey work was carried out on this building at the time due to it being unaffected by the proposed demolition of the later extension. This application has the potential to impact upon this known roost site, therefore the proposal will require further survey work to enable proper assessment of the potential disturbance. This is a requirement as defined under the Habitat Regulation (2010).

Internal and external alterations, extensions and removal of vegetation all have the potential to directly affect the roost site or impact on flight lines to and from the roost site. A detailed internal inspection of the building should be carried out and three activity surveys in accordance with the BCT guidance must be carried out before the proposal is given full consideration.

I have significant concerns regarding the existing trees on the site and their possible habitat quality as confirmed by section 7.4 of your Ecological Report. In terms of your proposal to refurbish the existing building (P/2014/0863) where your submitted Arboricultural Assessment is making reference to the removal of trees and shrubs

(i.e. to the front of the site), this may require additional surveys of these trees and shrubs to ensure that these habitats and navigational features are not harmed.

Comments also received from Natural Resources Wales reaffirm this point. In accordance with Welsh Government Planning Guidance (TAN5) this issue must be given full consideration prior to the determination of the planning application. I think this matter requires further discussion further and I would be happy to arrange a meeting with the Council's Ecologist. Given the requirement for additional activity surveys this is likely to delay the decision making process until these surveys can be carried out. I am advised that this could be until at least August. Further investigations by your ecologist at this stage may reveal further information to conclude otherwise but based on the information before me I am required to rely on the advice provided.

Highways

The local highway authority has responded regarding both schemes. As was discussed prior to the submission of the planning application the issue of student circulation remains of some concern. The site is somewhat isolated from the existing Coleg Cambria campus and the town centre by Powell Road and Chester Road. Access is possible via the pedestrian island at the roundabout on the junction of the two roads and via the subway beneath Powell Road. It would be beneficial at this stage to provide an indication as to whether the Coleg Cambria would propose to reopen the stepped access to the subway from the site. Highways have also suggested that a payment of £3500 be made by way of a legal obligation to allow for the upgrade the lighting of the subway. This is a matter that I need to discuss in more detail with highways and I feel that this could only be applicable to the outline element of this proposal. I wanted to make you aware of their comments initially but it is my opinion that this request is appropriate and proportionate given the level of pedestrian footfall from the site and the inadequacy of the pedestrian route across the roundabout mentioned above.

Other matters

Dee Valley Water have confirmed that a 10" water main crosses the site and have requested that this be given due consideration. Full details of the position of this main should be sought directly from Dee Valley water if you are not aware of this matter (mark.billing@deevalleygroup 01978 833281).

In view of the above comments I am unable to make a favourable recommendation at this stage and further urgent discussions are required. I would be grateful if you could contact me to forward this matter.

Yours faithfully



Head of Community Wellbeing and Development