

WEPCo & Flintshire County Council

**Mynydd Isa Campus**

Planning Statement

5-40

Final Draft for PAC | 20 July 2021

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 280340-00

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**ARUP**

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# 1 Introduction

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## 1.1 Overview

This Planning Statement has been prepared by Ove Arup and Partners Ltd. (Arup) and accompanies a full planning application for the redevelopment of Argoed High School, located to the south of Bryn Road, Mynydd Isa, Flintshire, CH7 6RY, hereafter referred to as ‘the site’. The application is submitted to Flintshire County Council (FCC) as Local Planning Authority (LPA) on behalf of WEPCo Ltd. and FCC Education Department as joint Applicant.

The site comprises the grounds of Argoed High School, including the main school building, sports hall building, two temporary buildings comprising four classrooms, hardstanding, road access/egress, three Multi-Use Games Areas (MUGAs) and ancillary grass playing fields and sports pitches.

This Statement describes the need for development, the site context, details of the proposed development and assesses this against relevant planning policy and material considerations in order to justify the grant of planning permission.

This Statement is structured as follows:

- Chapter 1 provides the introduction and overview of the application;
- Chapter 2 describes the site location, relevant designations and site context;
- Chapter 3 details the pre-application process undertaken for the site;
- Chapter 4 provides a detailed description of the proposed development;
- Chapter 5 outlines the relevant planning policy context;
- Chapter 6 provides the planning assessment within the context of relevant planning policies and material planning considerations; and
- Chapter 7 summarises the planning balance and justifies the grant of planning permission.

## 1.2 Summary of Proposed Development

The application seeks full planning permission for the redevelopment of the Argoed High School site to develop a new primary and secondary school in a co-located building, to be known collectively as the ‘Mynydd Isa Campus’ (the ‘proposed development’).

In summary, the planning application seeks consent for the following proposed works:

- Demolition of the existing Argoed High School buildings;
- Construction of a new Net Zero Carbon in operation school campus including nursery, primary and secondary provision;

- Hardstanding and pedestrian walkways;
- 124no. space car park for staff and visitors, to include 12no. Blue Badge car parking and 1no. minibus space;
- A parent drop-off area off Bryn Road, comprising 49no. formal spaces with capacity for up to 60 cars;
- 105no. covered cycle spaces, to include 90no. cycle spaces for pupils and 15no. cycle spaces for staff;
- 1no. floodlit All Weather Grass Pitch (AWGP) to include 3no. 5 aside football pitches (55.5 x 37m dimensions);
- 1no. grass football pitch and running track;
- 5no. floodlit MUGAs (18.5 x 37m dimensions);
- Play and amphitheatre spaces;
- Forest school / habitat / science garden;
- Pedestrian footbridge to the grass sports pitches to the southeast of the site;
- Retention of three existing grass sports pitches at the south of the site;
- Landscaping; and
- Sustainable Urban Drainage Systems (SUDS).

A proposed site layout for the development is shown on the Proposed Site Plan, enclosed with this planning application.

### 1.3 The Applicant

WEPCo Ltd. and FCC Education Department are the joint Applicant for the planning application. FCC are the landowner and service provider; and WEPCo is a Joint Venture between Meridiam Investments II SAS and the Development Bank of Wales on behalf of the Welsh Ministers. Arup, together with Lead Designer's Sheppard Robson Architects, has been appointed by the joint Applicant to lead a multi-disciplinary team to develop and submit proposals for the proposed development of the Mynydd Isa Campus.

### 1.4 Need for Development

Argoed High School is in a poor condition and no longer fit to support the needs of the new Welsh curriculum. There is a clear need to provide high quality energy efficient educational facilities and an opportunity to address the backlog of maintenance costs. The site also contains two double mobile and two single mobile classrooms providing accommodation for up to 90 pupil places. However, these mobile classrooms have been on site circa 18 years and have reached the end of their useful life.

Ysgol Mynydd Isa Primary School is split over two sites and within old buildings that place limitations on the provision of quality education for young people as well as posing duplication and management difficulties. The split site arrangement

creates difficulties with transition between Foundation Phase and Key Stage 2, reducing opportunities for collaboration and effective use and distribution of resources across the school.

By providing a new 3-16 school on the Argoed High School site, the proposed development would overcome the existing arrangements of the split site primary school and provide new facilities, including replacing the existing mobile classrooms at Argoed High School, providing a high quality facility for both schools and ensuring the development can meet the current and future demands of pupil places in the area.

The proposed development would also support improved opportunities for learning by:

- Increasing continuity and progression for learners aged 3-11 and 11-16 in the Flintshire area in all aspects of learning and teaching;
- Supporting the leadership and operational management of the schools through increased sharing of teaching expertise and enhanced learning curriculum opportunities of co-located staff;
- Improving facilities by addressing shortfalls in accommodation needs and providing purpose-built specialist areas for Design and Technology, Art, etc;
- Ensuring that relevant education provision is delivered in such a way that it meets the broad well-being needs of young people, parents/carers and communities; and
- Making the learning environment fit for purpose.

By increasing current levels of capacity, the proposed development would also meet and exceed forecast requirements for September 2023 in line with the planned Local Development Plan (LDP) housing provision. The FCC aspiration is for the proposed campus building to be operational by this date.

## 2 The Site

### 2.1 Site Location

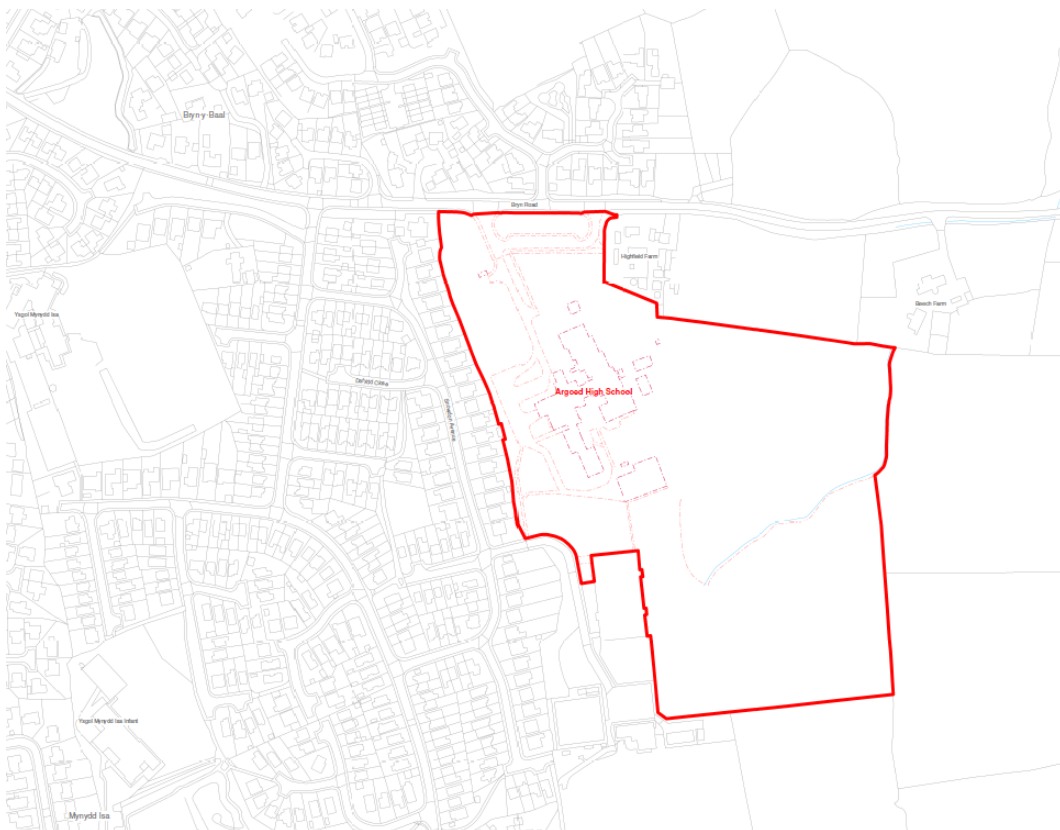
The application site for the new Mynydd Isa Campus comprises the grounds of Argoed High School, which is located to the south of Bryn Road, Mynydd Isa, Flintshire, CH7 6RY.

The site location is shown in Figure 1 and on the Site Location Plan submitted in support of this planning application and in Figure 1 below. The application site equates to approximately 8.8ha and is located to the east of the Mynydd Isa settlement boundary. The site is not allocated for any particular land use within the FCC Unitary Development Plan (UDP) and is within FCC's landownership.

The site is bound to the north by Bryn Road and residential development off Snowdon Avenue, Pen-Y-Garreg Close and Berwyn Close to the west. Open countryside and pastoral agricultural land exist to the east of the site and public open space in use as the Argoed Sports and Social Club to the south. The A549 is located approximately 1km to the south of the site.

The current land use is the Argoed High School and its grounds, including a main school building, sports hall building, two temporary buildings comprising four classrooms, hard standing, road access/egress, three MUGAs and ancillary grass playing fields and sports pitches. The existing high school was constructed in 1978.

Figure 1 Site location plan



## 2.2 Site Context

### 2.2.1 Access

The local highway network within the vicinity of the application site includes Bryn Road, Chambers Lane and Mold Road along with Llewelyn Drive, Park Avenue and Snowdon Avenue.

Vehicular access to the site is gained off Bryn Road to the north which provides access to the A5119 and A494 Mold Bypass to the north west and is subject to a 30mph speed limit. The road provides one lane in each direction allowing for two-way travel and in the vicinity of the existing Argoed High School provides access to the drop-off / pick-up facility as well as the main staff car park to the south.

Drop-off and pick-up facilities are provided for the existing Argoed High School off Bryn Road which provides informal parking for up to 20no. vehicles.

Within the vicinity of the existing school, Bryn Road provides footways on both sides of the road connecting to the wider pedestrian network and street lighting is provided at regular intervals. Pedestrian access to the site is also currently gained from a footpath which connects the site to the south-east along the back of properties on Snowdon Avenue.

Bus services are available within a reasonable walking distance of the application site, located at the following locations / distances away from the nearest point of access: bus service 4 – Cherry Drive (circa 200m); bus service 4 – Park Avenue (circa 200m); and, bus Service 5 – Chambers Lane (circa 600m). Bus service 4 provides approximately hourly services between Mold and Chester, with service 5 between Mold and Ellesmere Port.

Buckley Railway Station is located approximately 5km to the east of the site and can be accessed via Bryn Road or Mold Road (A549), located 450m to the south of the site. The station is served by an hourly service (Monday – Saturday), with southbound services to Wrexham Central and northbound to Bidston.

### 2.2.2 Designations

The site is not located within any statutory environmental or historic landscape designations. There are also no designated heritage assets within the site boundary.

Within the wider surroundings, the following features are considered of relevance:

- The Buckley Claypits and Commons Site of Special Scientific Interest (SSSI) located approximately 770m to the east from the centre of the application site and the Maes-Y-Grug SSSI located approximately 1.5km to the north of the centre of the application site.
- The Deeside and Buckley Newt Special Areas of Conservation (SAC) located approximately 770m to the east and 1.5km to the north of the centre of the application site, respectively.

- The Coed Argoed Local Wildlife Site (LWS) and the Bryn y Baal Quarry Regionally Important Geological Site (RIGS) both located within 1km of the site.

### 2.2.3 Surrounding Land Uses

As outlined in the Site Location section above, the site is surrounded by several land uses including agricultural land, residential development and sports facilities.

The site is located just outside the settlement boundary of the village of Mynydd Isa which is located between the county towns of Mold and Buckley in the community of Argoed.

Mynydd Isa is predominantly residential, with development focused north of Mold Road and south of Bryn Road. There is no separate or distinct high street or village centre, however, retail and food and drink establishments (A1 and A3 Use Classes) are concentrated on land between Bryn Road and Mercia Drive.

Aside from the existing Argoed High School (the site), there are two other schools within the village, Ysgol Mynydd Isa Primary School and the Ysgol Mynydd Isa Infant Site, which would be replaced through the new proposed Mynydd Isa Campus. Argoed Sports and Social Club is located immediately south of the site and includes several sports pitches including a bowling green, cricket green, grass sports pitch and artificial sports pitch plus a children's play area and club house.

To the east of the site is agricultural land separated by irregular field boundaries and interspersed with mature trees, which act as a gap between the settlements of Mynydd Isa and Buckley.

### 2.2.4 Ecology and Landscape

There are no statutory local, national or international landscape or ecology designations on or immediately adjacent to the site.

The nearest statutory designated ecological site is the Deeside and Buckley Newt SAC, which is located approximately 770m to the east and 1.5km to the north of the centre of the application site respectively.

The application site is characterised by close mown grass, interspersed with mature trees and some shrub and amenity planting around the existing school building. The remainder of the site comprises hard surfacing, including tarmac and flag paving.

A Phase I Habitat Survey was conducted across the whole site on 22 May 2020 and this concluded that overall, the site was considered to be of low value to wildlife as it is dominated by close mown amenity grassland/playing fields with relatively low floristic diversity.

Nocturnal emergence and dawn re-entry surveys to confirm the presence or absence of roosting bats were undertaken on 22 August 2020 and 6 September 2020, respectively. From the evidence of these surveys and the diurnal inspection, the site is considered to comprise low foraging activity of the Common Pipestrelle



Bat in the wider area, with no roosting on site. The existing school buildings were not identified as bat roost or foraging habitat, and on this basis, no further surveys or mitigation measures are proposed.

An Arboricultural Survey of the site has been undertaken, which confirmed that Category A, B, C and U trees are present on site. The majority of the Category A trees are at the site boundary, although there is a notable Category A Oak tree in the vicinity of the existing sports hall. Boundary trees located at the site are mainly deciduous and predominantly located around the lower eastern half of the application site.

## 2.2.5 Cultural Heritage and Archaeology

There are no designated heritage assets or historic designations within or covering the site.

Clwyd Powys Archaeological Trust has confirmed that the site is of low archaeological potential based on the Historic Environment Record (HER). There are no recorded sites within or immediately adjacent to the site boundary, no potential archaeological features are identified on the 1840 tithe, or old OS mapping between the 1st-4th editions and no historic sites are identified on the 1 metre NRW lidar, which shows generally featureless fields.

However, the mature hedgerows across the site are all historic and in accordance with the Hedgerow Regulations Act 1997 they may be considered to be part of pre-enclosure (deemed to be 1850) field systems, therefore they constitute heritage features classed as 'important'.

## 2.2.6 Ground Conditions

In terms of topography, the site is set across two levels, with the west of the school at a higher level (+158m AOD) than the east (+145m AOD). At the north of the site there is a notable landform between Bryn Road and the existing main school building, which obscures views of the site from Bryn Road. An existing watercourse separates the existing playing pitches to the north east from those located to the south of the site.

With regards to land contamination, a Phase I Geo-Environmental Desk Study Report and Phase II Geo-Environmental Assessment have been undertaken for the site, which concluded amongst other findings that the concentrations of potential contaminants recorded at the site are below the relevant General Assessment Criteria.

A Coal Mining Risk Assessment has also been undertaken, which confirms:

- There is some potential evidence of shallow mine workings across the site, in the form of shafts and possible workings at one location, but generally intact coal has been encountered; and
- Given the absence of recorded workings and lack of evidence in the 1975 ground investigation for workings it is considered unlikely that extensive unrecorded workings exist beneath the site.

## 2.2.7 Hydrology

The Welsh Government Technical Advice Note (TAN15) and Natural Resources Wales (NRW) flood maps<sup>1</sup> show that the site is located within Flood Zone A, an area with a low probability of conjectural tidal/fluviial flooding.

A watercourse crosses the centre of the site (west to east) and accepts flows, via a Dŵr Cymru Welsh Water (DCWW) storm sewer, from residential development to the west of the site.

Localised areas of the site have low-risk areas of surface water flooding. These appear to be in the topographical low areas, where surface water run-off could accumulate at shallow depth and are centred around the open watercourse flowing from west to east through the centre of the site.

Existing drainage features for the site are detailed in Appendix B of the Drainage Strategy, which is enclosed with the planning application.

## Foul Drainage

DCWW's foul public drainage is located adjacent to the site to the west in Snowdon Avenue. The foul flows from the existing school building are transferred to a pumping station located within the school grounds to the east.

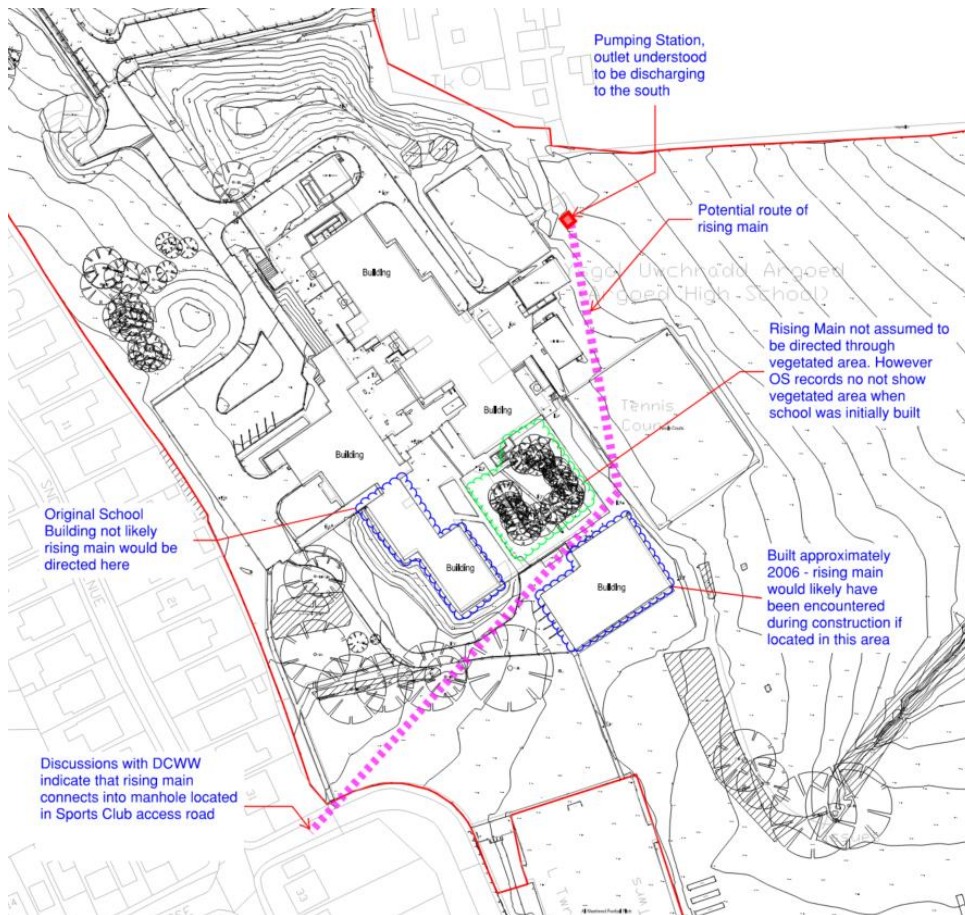
The route of the rising main connecting the pumping station to DCWW's public sewer network is currently not known within the site. Non-intrusive investigations have been conducted on site to map the alignment of the rising main however, the route is yet to be found. Access to the pumping station building has been obtained and it appears the rising main flows to the south.

Based on this information, discussions with DCWW, historical mapping/images and the location of the recently built sports hall an anticipated route has been plotted as shown on Figure 1. Further investigations are required to confirm this rising main route.

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<sup>1</sup> NRW Development Advice Maps; River and Sea Flooding Maps; and Surface Water Flooding Map.

Figure 2 Anticipated route of the foul rising main – to be confirmed by further investigations



## Storm Water Drainage

The site generally falls from west to east and north to south towards the watercourse located within the centre of the site. The watercourse is the main drainage feature within the site accepting overland flows from the grassed area and the southern extents of the school.

A 450mm concrete storm water network crosses the southern extents of the site and discharges into the watercourse. Since the sewer is present within the site, an easement is present which allows DCWW, as a Statutory Undertaker, to gain access to their apparatus.

## Rainfall Run-off Catchments

Preliminary geotechnical investigations indicate that the underlying ground is relatively impermeable. It is therefore expected that the majority of the site's runoff flow into the watercourse located within the site before it flows into the Alltami Brook, to the north-east of the site.

Details of the existing rainfall runoff catchments and existing greenfield and brownfield run-off rates are presented within the Drainage Strategy, which is submitted with the planning application.

## 2.2.8 Utilities

A buried services survey has been undertaken on site. Drawing FL0101-ARP-01-00-DR-C-25001, submitted with the planning application, shows the existing utilities located within the site.

## 2.3 Planning History

The planning history for the application site is set out in Table 1 below.

Table 1: Planning history for the application site

Ref. No	Status	Description of proposal	Application type	Decision issued date	Decision
062630	Decision Issued	Screening Opinion for the redevelopment of Argoed High School.	Screening Opinion	15/04/2021	Screening Opinion Issued confirming an EIA is NOT required
059864	Decision Issued	Erection of lift extension	Planning-Full (Building Works)	10/06/2019	Approved
058494	Decision Issued	Renewal of planning permission reference 053799 for the siting of 1no.classroom unit	Planning-Renewal	04/07/2018	Approved
058491	Decision Issued	Renewal of planning permission reference 053742 for the siting of 1no.classroom unit	Planning-Renewal	04/07/2018	Approved
053799	Decision Issued	Renewal of planning permission ref: 049864 for temporary siting of mobile classroom	Planning-Renewal	23/07/2015	Approved
053742	Decision Issued	Renewal of planning permission ref: 049863 to allow temporary siting of mobile classroom	Planning-Renewal	10/07/2015	Approved
049864	Decision Issued	Renewal of planning permission ref: 048683 to allow siting of 1no. temporary classroom	Planning-Renewal	27/07/2012	Approved

<b>Ref. No</b>	<b>Status</b>	<b>Description of proposal</b>	<b>Application type</b>	<b>Decision issued date</b>	<b>Decision</b>
049863	Decision Issued	Renewal of planning permission ref: 048687 to allow siting of 1no. temporary classroom	Planning-Renewal	27/07/2012	Approved
048687	Decision Issued	Renewal of planning permission ref: 047397 to allow siting of 1no. temporary classroom	Planning-Renewal	18/07/2011	Approved
048683	Decision Issued	Renewal of planning permission ref: 047396 to allow siting of 1no. temporary classroom	Planning-Renewal	27/07/2012	Approved
047397	Decision Issued	Renewal of planning permission ref: 045014 to allow temporary siting of mobile classroom for a further two years	Planning-Renewal	10/06/2010	Approved
047396	Decision Issued	Renewal of planning permission ref: 045020 to allow temporary siting of mobile classroom for a further two years	Planning-Renewal	09/06/2010	Approved
045020	Decision Issued	Renewal of planning permission ref. 041458 for the siting of 1 no. single temporary classroom unit	Planning-Vary/Remove Condition	12/08/2008	Approved
045014	Decision Issued	Renewal of planning permission ref. 41427 to allow the siting of 1 no. temporary double classroom unit	Planning-Vary/Remove Condition	27/06/2008	Approved
042726	Decision Issued	Part replacement of school perimeter fence and provision of a single storey storage container	Planning-Full (Building Works)	19/03/2007	Approved
041458	Decision Issued	Renewal of temporary planning permission for 1 no. single temporary classroom	Planning-Renewal	06/07/2006	Approved
041427	Decision Issued	Siting of 1 no. temporary double classroom unit	Planning-Full (Building Works)	04/07/2006	Approved

<b>Ref. No</b>	<b>Status</b>	<b>Description of proposal</b>	<b>Application type</b>	<b>Decision issued date</b>	<b>Decision</b>
040245	Decision Issued	Erection of a pre-cast concrete garage for a minibus	Planning-Full (Building Works)	02/12/2005	Approved
039764	Decision Issued	Revised route of access to proposed sports hall site	Planning-Full (Building Works)	26/09/2005	Approved
039406	Decision Issued	Erection of 4 no. 6 metre high columns and 1 no. 8 metre high column to provide mountings for CCTV cameras	Planning-Full (Building Works)	08/07/2005	Approved

## 3 Pre-application Consultation

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### 3.1 The Pre-application Process

From the outset, a collaborative approach has been adopted for the pre-application process, engaging with both key stakeholders and the local community, as set out below.

#### 3.1.1 FCC and Technical Consultees

A formal Pre-application Request was submitted to FCC on the 6 April 2021 and a response received on the 14 June 2021.

Overall, it was confirmed that the proposals are supported in principle.

Key issues for any future planning application were considered to be the amalgamation of the three local school campuses into one in terms of the impact on the highways network, as well as the impact of the school building and general use of the site upon the amenity of local residents.

It was confirmed by the Case Officer as part of the Pre-application enquiry response that the following technical documents would be required in support of the planning application:

- Travel Plan
- Noise Impact Assessment
- Lighting Impact Assessment
- Visual Appraisal

A Visual Appraisal Scoping Assessment was also submitted alongside the Pre-application Request.

### Highways

Ongoing meetings with FCC's Highway Development Control Manager also took place during the pre-application phase and key comments are summarised as follows:

- The submitted Pre-application Statement makes reference to a future Transport Assessment and Travel Plan; an effective highway consideration is not possible without access to these documents.
- It is suggested that the redevelopment is a re-siting of existing educational facilities and will re-distribute existing traffic rather than generate significant increases. Assuming the catchment areas do not change it is accepted that transport requirements to and from the secondary school are unlikely to change. The primary school currently occupies two sites which are relatively central to the Mynydd Isa community; re-location is likely to result in an overall increase in travel distances and a potential increase in vehicular movements.

- The submitted statement acknowledges the requirements of Policy STR2 and in particular, the requirement to reduce the use of the private car in development; compliance with Active Travel Regulations will be key to successful delivery of the proposals.
- The submission of a fully detailed Travel Plan will be required as part of any future application. This should include consideration of pupil distribution and survey of current and proposed modes of travel. Results of such a survey can then be used to establish/manage future travel patterns and ensure appropriate off-site infrastructure is provided.
- The statement suggests the provision of a 140no. space car park and 84no. covered cycle spaces in line with BREAM requirements however the illustrative site masterplan shows a parking layout with a total of 166no. spaces. The requirements of SPGN11 Parking Standards needs to be taken into consideration.
- Car parking and Active Travel provision are likely to have a significant impact on travel patterns and modes of transport and must be identified at an early stage.

## SUDS Approving Body

A meeting with the FCC SUDS Approval Body (SAB) Officer was held on the 2 March 2021 where the following matters were discussed/confirmed:

- The school will be constructed and operated for 25 years by WEPCo and the SuDS features within the site will be maintained by the developer until handover.
- The existing school will need to be operational during the construction works.
- The existing site drains into one catchment and there are three sub-catchments on site. The proposed development would have three sub-catchments and will be broadly the same as existing (based on phasing).
- Existing drainage accepting runoff from the western residential development discharges into the watercourse within the site and would be maintained as existing.
- No attenuation structures were observed in the buried ground survey and expect existing runoff drains freely into the watercourse.
- The existing impermeable areas will be investigated and brownfield runoff rate +30% betterment would be implemented as part of the runoff rate for each sub-catchment.
- FEH data will be used to inform drainage design instead of the FSR method.
- The highways team at FCC would be contacted to present proposals for the northern outfall into Bryn Road.
- It was understood that that the watercourse flows through a culvert in the Beech Farm property to the north east before connecting into Bryn Road.



- The next task for the engineering team will be to assess the existing site and identify what is brownfield and what is greenfield to inform drainage design.
- Permeable paving would be incorporated into the development.
- Where necessary to provide storage, attenuation cells would be acceptable for the development assuming pre-treatment.
- Point G2.1 within the SuDS standard - bioretention planted area to be a fifth of total impermeable area - can be treated as guidance and an aspirational target which would not be critical for approval.

The placement of SuDS features would need to consider the DCWW water main to the east of the site.

## Other Statutory Consultees

In addition to engagement with FCC, early engagement with Clwyd Powys Archaeological Trust and Sport Wales has taken place to identify any key issues for the site and agree the application requirements.

### 3.1.2 Environmental Impact Assessment Screening

An Environmental Impact Assessment (EIA) Screening Request was also submitted under Regulation 7 of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 to FCC on 3 March 2021.

FCC subsequently issued its Screening Opinion on the 15 April 2021, which confirmed that the proposed development would not require an EIA. A copy of the letter is included in Appendix I of this Statement.

### 3.1.3 Pre-Application Consultation (PAC)

The scale of the proposed development also means that it must comply with the Pre-Application Consultation requirements of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012. Consequently, and in accordance with the regulations, stakeholders and the public will be able to view and comment on the draft planning application documentation and plans in advance of formal submission.

The PAC period will run between 22 July and 23 August 2021 and the full planning application, including drawings and plans will be available for viewing online on the WEPCo Ltd website (<https://wepco.cymru/projects/mynydd-isa>).

Full details of the pre-application consultation activities undertaken will be presented in the Pre-application Consultation Report which will be submitted in support of the planning application.

## 4 Proposed Development

### 4.1 Full Planning Application

The planning application seeks full planning permission for the proposed re-development of the Argoed High School site to create a new combined educational facility in a co-located building to form the Mynydd Isa Campus.

The high school and primary school would remain as separate schools but operate within a single building with some shared facilities.

The new primary school would accommodate 600 places with a 43-place nursery and a 20-place primary speech and language specially resourced provision facility.

The high school would accommodate 700 places with a 10-place secondary speech and language specially resourced provision facility and a 20 place Asperger's specially resourced provision facility.

In total, there would be an uplift of circa 207 pupils across all year groups at the site, including 87 additional primary school pupils and 120 additional high school pupils.

Development proposals for the development are outlined below, further design details are also found within the Design and Access Statement submitted in support of the planning application.

The proposed layout for the development is shown on the landscape masterplan, enclosed with the planning application and in Figure 3 below.

Figure 3 Landscape Masterplan



## 4.2 Development Proposals

### 4.2.1 School Buildings

The school buildings would comprise a superblock, two storeys in height and would have a gross internal floor area of approximately 10,480sqm. A finger-block form is proposed which is considered most appropriate for the development for the following reasons:

- To provide the necessary separation between primary and secondary teaching areas;
- To have appropriate relationships with separate primary and secondary external areas;
- To achieve good natural light to all teaching areas for a school of this size;
- To enable a more nuanced relationship between the building and the site levels and to enable both good relationships to external learning and recreation spaces, but also to minimise excessive cut-and-fill; and
- To provide benefit in relation to the Net Zero Carbon in operation aspirations by providing good natural environmental conditions through maximising natural ventilation and natural lighting of spaces, whilst minimising summer overheating, especially with the fingers oriented east-west.

The location of the buildings would also maintain access to High Field Farms and the buildings would be located in a lower part of the site, away from residential properties to reduce impacts on residential amenity.

The building would be fronted by the main entrance/reception forming a centrally located approach for visitors to both schools. The primary school and nursery would be located in the northern wing of the school building adjacent to the site approach and car park. It would be organised over two floors and the arrangement of learning spaces would follow an age-based progression around the building.

The secondary school would be located in the southern wings and would also be organised over two floors in three 'fingers'. The accommodation would be organised on a subject basis with general teaching (Maths, English, Humanities, Languages) in the southern finger, and all specialist teaching in the two northern fingers. The specialist areas are arranged to facilitate a number of subject groupings. Please refer to the indicative floor plans below (Figure 4 and Figure 5) and submitted in support of this planning application for further details.

The two schools would be connected by the joint main entrance and reception and the joint kitchen located to the eastern side of the building, connected to a service yard via footpaths located towards the north eastern boundary of the site.

The school building itself would form the secure line, with the main entrance serving as the principal secure gateway.

The proposed external appearance for the school buildings are as shown on the Indicative 3D views within the Design and Access Statement, which is submitted in support of the planning application.

Proposed materials for the building fabric are detailed on the Elevation Plans submitted with the planning application. Materials include facing brickwork for the façade, standing seam for the roof and PCC aluminium and glazing for windows and doors. It is expected that specific material details would be confirmed via condition. Further details on the design principles of the proposed development are provided within the Design and Access Statement.

Figure 4 Ground Floor Plan - Labelled





Figure 5 First Floor Plan - Labeled



## 4.2.2 Sports and Recreational Facilities

The sports facilities for the school are shown on the Landscape Masterplan on Figure 3, which is also submitted in support of the planning application.

The school sports provision would be located to the west, east and south of the school buildings and would comprise a mixture of five hardstanding floodlit MUGAs, a floodlit AWGP containing three 5-a-side football pitches, a grass football pitch and running track, retention of the existing grass sports pitches to the south of the site and a sports hall. The provision has been designed in accordance with the relevant frameworks set out in Building Bulletins BB98<sup>2</sup> and

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2

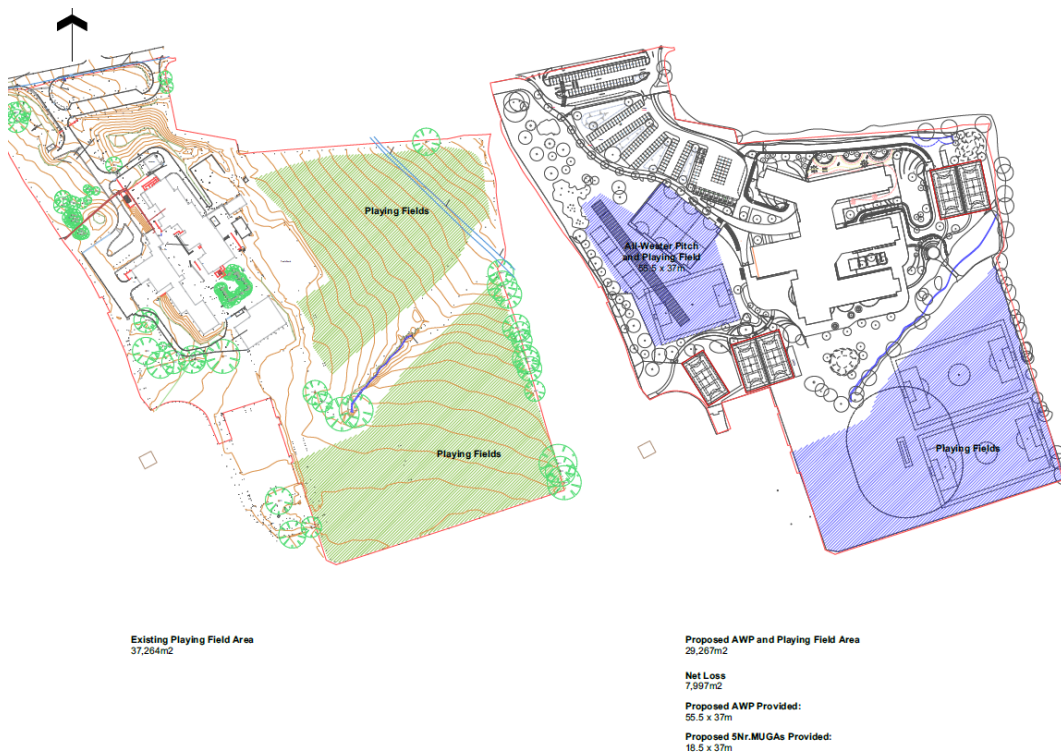
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/288107/building\\_bulletin\\_98\\_-\\_briefing\\_framework\\_for\\_secondary\\_school\\_projects.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/288107/building_bulletin_98_-_briefing_framework_for_secondary_school_projects.pdf)

BB99<sup>3</sup> (Sections A and B); and BB103<sup>4</sup> (Area guidelines for mainstream schools) for the combined school/campus.

A net loss of approximately 7,997sqm of playing fields is proposed due to the siting of the new school building on existing playing fields within the north east of the site. This is depicted on Figure 6 below. However, Sport Wales confirmed through a pre-application enquiry that the existing playing fields do not meet their recommended pitch requirements due to the gradient in this part of the site and are only partly marked out as a formal sports pitch and are therefore sub-standard in quality. The proposals would also compensate this loss through the provision of new and enhanced sports facilities. In addition to the 29,267sqm of playing fields, the 5no. MUGAs would provide an additional 3,422.5sqm of formal sports pitch area, thereby partially offsetting the loss of existing playing fields within the north east of the site.

It is also proposed that some of these sports facilities would be available to the community outside of school hours, as detailed in the sub-section below.

Figure 6 Playing field comparisons between existing site and proposed development



## AWGP

The AWGP would be 55.5m x 37m and has been designed to primarily accommodate football alongside other informal sports. The pitch would be located on the site of the existing school buildings. It would be set down by circa 3 metres

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[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/288108/building\\_bulletin\\_99\\_-\\_briefing\\_framework\\_for\\_primary\\_school\\_projects.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/288108/building_bulletin_99_-_briefing_framework_for_primary_school_projects.pdf)

<sup>4</sup> <https://www.gov.uk/government/publications/area-guidelines-and-net-capacity>

from the retained existing level at the west of the site and located circa 45m from the nearest residential properties on Snowdon Avenue to mitigate any potential impact on residential amenity.

The AWGP would comprise short pile (40mm) 3G Artificial Sports Turf with a rubber crumb fill system suitable for football and hockey.

To prevent impact from noise a 3m high solid noise barrier is proposed around the northern and western boundary of the AWGP. Additional mesh fences are also included around the AWGP between the pitch and the solid noise barrier to prevent the noise of balls hitting the solid barriers. Details of proposed fencing are indicated on the Fencing and Security Strategy, submitted with the planning application.

In accordance with Sports England – Artificial Sports Lighting guidance, the AWGP would be floodlit with 12no. floodlights to be mounted at 15 metres in height. A Flood Lighting Assessment has been submitted in support of the planning application and concludes that the flood lighting would not cause undue amenity impacts on surrounding land, including residential areas as out in further detail within Section 6.3.5 below. Additional details of the proposed lighting arrangement are included in Appendix A of the Flood Lighting Assessment.

## MUGAs

The MUGAs would be 18.5 x 37m and have been designed to accommodate a variety of sports including football, basketball and tennis. Fencing for the MUGAs would be 3 metres in height and would comprise weldmesh, as indicated on the Fencing and Security Strategy, submitted with the planning application.

The external lighting for the MUGAs has also been designed in accordance with Sports England – Artificial Sports Lighting guidance. The 4no. MUGAs would have 12no. pitch floodlights to be mounted at 10m in height. The 1no. MUGA closest to Snowdon Avenue (located to the south west of the site) would have 8no. pitch floodlights mounted at 10m in height.

Proposed lighting arrangements were also considered in the Flood Lighting Assessment, where it is confirmed that there would be no undue amenity impacts for surrounding areas, as set out in further detail within Section 6.3.5 below. Specifications and rationale for this proposed lighting arrangement are set out within the Flood Lighting Assessment submitted with the planning application.

## Other play spaces

The primary school external play areas would consist of a mix of hard and soft areas outside of the classrooms, comprising approximately 6500sqm of total space. The proposed surface is primarily macadam with line markings, and rubber crumb to the nursery and reception spaces.

Grass areas and tree planting are proposed to define the soft play spaces throughout the site.

The high school external hard play consists of 3000sqm of macadam surface with access to the wider soft areas and pitches.

Both primary and high schools would have access to an amphitheatre space with 450mm height seating walls and grass banks between. This would be located to the east of the school building.

An area to the northwest of the site and west of the proposed car park is proposed to be landscaped with meadow seeded areas and tree planting for educational use as a forest school. The proposed forest school and habitat area would provide flexible use of the schools' curriculum.

The rain gardens located within the external areas of the school building, alongside dry attenuation basin SUDS features proposed within the south and north east of the site can be utilised as a learning resource for all years.

## Community Use Element

WEPCo recognises the importance of placemaking and is committed to strengthening the connection between people and the places they share. At the heart of the WEPCo investment programme, through which the proposed development would be delivered, is a commitment to responsible investment that delivers impact for now and for future generations.

The Wellbeing for Future Generations Act and the UN Sustainable Development Goals (SDGs) are central to the Applicant's strategy and projects. WEPCo have ambitious plans for a Social Value programme that supports Wales and Flintshire's Social, Economic, Environmental & Cultural priorities.

As part of this social value and community benefit aims, the proposed development would accommodate a community use aspect. In addition to the AWGP being available to the school, the pitch and associated changing facilities would also be available for community use by the general public outside of the operational hours of the school.

The proposed hours for use of these facilities are:

- 08:00-17:00hrs Monday – Friday for the school only; and
- 17:00-22:00hrs for the wider community Monday to Friday, to include access to the changing facilities and toilets within the school building.
- 9:00 – 18:00 Saturday, Sunday and Bank Holidays for wider community use.

### 4.2.3 Access and Movement

The proposed access and circulation strategy for the development is as set out on the Access and Circulation Plan, submitted with the planning application. This plan details the proposed arrival and departure circulation, proposed access during the day and out of hours use by the community and visitors, alongside emergency access.



## Pedestrian and Cycle Access

Primary pedestrian and cycle access would continue to be gained off Bryn Road via two dedicated shared paths from Bryn Road to the entrance of the school. The existing secondary path off Snowdon Avenue to the south-east of the site would also be retained as part of the proposals but enhanced to form a shared access for both pedestrians and cyclists. All shared routes would be a minimum of 3m wide to accommodate a mix of users.

The main school entrance would be located at the western side of the main school building. Two entrances from the outdoor sports areas are also proposed at the western side, one for the primary school, which would provide access to the western finger of the primary school, and one for the secondary school, which would provide access to internal changing spaces located adjacent to the sports hall.

Multiple accesses are proposed on the ground floor of the primary school at the north of the main school building, which would provide internal access to an external covered terrace and dedicated nursery and primary external play spaces.

A number of accesses are also proposed in the central fingers of the main school building, which would provide access to external dining and play areas as part of the secondary school.

## Vehicular Access

Vehicular access would continue to be provided off Bryn Road. The existing two-way accesses off Bryn Road would be modified to become an access and egress to create a one-way flow of vehicular traffic from east to west, as indicated on the Access and Circulation Plan.

## Vehicular Parking

A total of 124no. car parking spaces are proposed in the main car park including 12no. spaces reserved for Blue Badge holders (10% of total spaces), 1no. minibus space and 112no. standard spaces.

Marked visitor bays would be provided within the quantum of the proposed parking provision, and where possible will be located within 50 metres of building entrance points.

The proposals include alterations and improvements to the current drop-off / pick-up facilities as illustrated on the Access and Circulation Plan, with the new facility formalising the one-way system, along with providing additional parking for drop-off / pick-up, as well as space for a coach to access. In addition, dropped kerbs, tactile paving and zebra crossings are included to cater for pedestrians, and the access junctions to / from Bryn Road would be reduced in width to further improve the pedestrian environment at these entry / exit points.

The drop-off area would comprise 49no. formal spaces with capacity for up to 60 cars within the northern and southern loop and drop-off space for coaches and

additional cars on the southern loop. This provides circa triple the capacity of the existing provision of 20no. spaces.

A Drop-off and Pick-up Capacity Note has been provided to FCC Highways to address a point raised regarding the operating capacity during key times of the day, which is subject to ongoing discussion and detailed further within the Transport Assessment submitted with the planning application.

Electric vehicle charging would be provided at a rate of 10% active charging which accords with the emerging FCC and Welsh Government guidance. The remainder of spaces (90%) would be provided with passive charging with the ability to be converted in the future.

In addition, the benefits of car sharing are promoted as part of the Travel Plan and priority car sharing parking spaces (marked with a 'P') for staff would be provided nearest to the building to encourage the uptake of this mode.

## Cycle Parking

A total of 105 no. cycle parking spaces would be provided (90no. for pupils and 15no. for staff) within the proposed development and located to the south east of the AWGP, as indicated on the Landscape Illustrative Masterplan. Staff parking spaces would be in a separate lockable store however this would be located within the same cycle parking area. Proposed cycle parking for all users would comprise Sheffield cycle hoops with covered canopies.

## Servicing and Delivery

A dedicated service and delivery yard plus bin store would also be located to the north-east of the site linked to the shared kitchen located on the central finger of building and on the ground floor. A dedicated turning area is also provided for deliveries, servicing and refuse collection.

### 4.2.4 Sustainability

The proposed development has been designed to meet a strict operational net zero carbon targets, whereby all operational energy consumed on site (both regulated and unregulated) would be generated by an extensive roof mounted solar photovoltaic array. This array would offset 100% of the carbon emissions annually for the energy usage of the building, therefore being 'net zero carbon' in operation in line with the UK Green Building Council framework definition<sup>5</sup>.

The proposed development is anticipated to achieve, at a minimum, an 'Excellent' BREEAM rating. Together, proposals would make a strong contribution towards Welsh Government commitments to achieving net zero by 2050. Further details of

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<sup>5</sup> UK GBC (2019) Net Zero Carbon Buildings: A Framework Definition  
<https://www.ukgbc.org/wp-content/uploads/2019/04/Net-Zero-Carbon-Buildings-A-framework-definition.pdf>

how the proposed development would exceed policy requirements and Welsh Government sustainability targets is set out in Section 6.3.2.

#### 4.2.5 Security

In order to maintain appropriate levels of security at the site, perimeter security fencing (2.4m in height) would be erected at the west, east and southern site boundaries, with the exception of the northern drop-off car parking area off Bryn Road. Perimeter security fencing would separate the drop-off area and car parking area to the north of the main school entrance.

Internal security fencing (1.2m height) would be erected around the car park and around the nursery and primary external play areas, located around the northernmost 'finger' of the main school building. Existing hedgerows boundary treatment at the northern boundary of the site would be maintained and act as a further screening measure from adjacent land and properties off Bryn Road.

#### 4.2.6 Landscape and Biodiversity

The proposed design of the external spaces is indicated on the Landscape Masterplan, submitted with the planning application (also included at Figure 3).

The proposed development would transform much of the current school site to create a new school building and ancillary development that would be set within the landscape and surrounded by existing mature vegetation, proposed tree planting, open green spaces and school sports facilities.

The orientation of the school and external social spaces would allow the proposed development to take advantage of views over fields to the east. The entrance approach is designed to satisfy the car parking requirements for the proposed development, while ensuring that this car parking element is broken up visually to reduce its potential impact. This would also maintain the green aspect of the site from Bryn Road.

Circa 22no. trees are proposed for removal in order to facilitate and in conjunction with the proposed scheme design. All Category A trees are proposed for retention at the site, alongside existing hedgerows including along the existing brook.

Replacement trees and new additional tree planting is proposed, to the sum of 131no. trees.

All existing mature trees and hedgerows along the application site boundaries would be retained, with additional tree, hedge and shrub planting proposed around the main school building in accordance with the Planting Strategy, which is submitted with the planning application.

The existing school playing fields to the south of the site would remain as existing. An area to the northwest of the site and west of the proposed car park is proposed to be landscaped with meadow seeded areas and tree planting for educational use as a forest school.

The areas of planting close to the building would function as rain gardens to capture treat and convey water from the roof that would connect to a site wide SUDS network comprising swales to parking areas and ponds at the east of the site.

#### 4.2.7 Drainage

The approach to underground drainage is addressed in conjunction with the approach to site-wide utilities, SUDS and earthworks as part of a coordinated civil engineering strategy. Consideration has been given to the proposed runoff destination, hydraulic control, water quality, amenity and biodiversity for the scheme.

The surface water drainage strategy has also been considered in accordance with the Welsh Government's Statutory Standards for Sustainable Drainage Systems and is set out in detail within the Drainage Strategy and the Proposed Drainage Layout.

The Proposed Drainage Strategy Plan details the following proposals across the site:

- Retention of existing 225mm pipe and drainage for northern drop-off area;
- Bioretention features located within the main car park to collect and treat car park run-off for mobilised pollutants;
- Attenuation of the car park by pervious paving, with approximately 350m<sup>3</sup> storage provided;
- A proposed drainage connection from the AWGP;
- Grass playing fields to have field drainage;
- 2no. bioretention and tree pit areas within the external areas adjacent to the building 'fingers' at the east;
- Circa 200m<sup>2</sup> of bioretention features around the building perimeter to treat stormwater flows from roads prior to outfall to drainage network;
- Retention of existing field drain in south east of the site;
- Construction of southern and eastern basins (unlined) with a stormwater connection to watercourse restricted by vortex flow control. Discharge rates to be agreed with SAB;
- Inclusion of pervious pavement on MUGAs to accommodate large storm events.

The proposed drainage strategy for foul drainage, stormwater drainage and water quality measures are provided in the Drainage Strategy submitted in support of the planning application.

#### 4.2.8 Construction

It is intended that the delivery of the campus would be phased with Argoed High School continuing to operate from the site during the construction of the new

building, with the existing building subsequently demolished in its entirety and form an area of landscaping. A demolition strategy would be developed by the Main Contractor, once appointed.

### 4.3 List of Plans and Documents

The following plans and documents are submitted in support of the planning application and provide full details of the proposed development.

#### Plans

- Site Location Plan (FL0101-SRA-ZZ-ZZ-DR-A-02000)
- Site Layout Plan (FL0101-SRA-ZZ-ZZ-DR-A-02001)
- Proposed General Arrangement Sheet 1 (FL0101-ARP-01-00-DR-C-20011)
- Proposed General Arrangement Sheet 2 (FL0101-ARP-01-00-DR-C-20012)
- Ground Floor Plan (FL0101-SRA-ZZ-00-DR-A-02100)
- First Floor Plan (FL0101-SRA-ZZ-00-DR-A-02101)
- Roof Plan (FL0101-SRA-ZZ-00-DR-A-02110)
- Elevations North and East (FL0101-SRA-XX-XX-DR-A-02200)
- Elevations South and West (FL0101-SRA-XX-XX-DR-A-02201)
- External Wing Elevations (FL0101-SRA-XX-XX-DR-A-02202)
- Internal Wing Elevations (FL0101-SRA-XX-XX-DR-A-02203)
- Typical Bay Elevation and Strip Section – Primary School (FL0101-SRA-XX-XX-DR-A-02250)
- Typical Bay Elevation and Strip Section – Main Entrance (FL0101-SRA-XX-XX-DR-A-02251)
- Typical Bay Elevation and Strip Section – Secondary Dining (FL0101-SRA-XX-XX-DR-A-02252)
- Site Wide Masterplan (FL0101-ALA-00-XX-DR-L-0016)
- Sections (FL0101-SRA-ZZ-00-DR-A-02204)
- Existing Drainage and Utilities (FL0101-ARP-01-00-DR-C-25001)
- Proposed Drainage Plan (FL0101-ARP-01-00-DR-C-24001)
- Proposed Earthworks (FL0101-ARP-01-00-DR-C-21001)
- Proposed Construction Finishes (FL0101-ARP-01-00-DR-C-22011)
- External Lighting Layout (FL0101-ARP-01-XX-DR-E-21002)
- Fencing and Security Strategy (FL0101-ALA-00-XX-DR-L-0004)
- Planting Strategy (FL0101-ALA-00-XX-DR-L-0017)
- Outline Levels Plan (FL0101-ALA-00-XX-DR-L-0018)
- Landscape Illustrative Masterplan (FL0101-ALA-00-XX-DR-L-0002)
- Landscape General Arrangement 1 of 2 (FL0101-ALA-00-XX-DR-L-0003)
- Landscape General Arrangement 2 of 2 (FL0101-ALA-00-XX-DR-L-0009)

- Detail Landscape GA 1 of 6 (FL0101-ALA-00-XX-DR-L-0010)
- Detail Landscape GA 2 of 6 (FL0101-ALA-00-XX-DR-L-0011)
- Detail Landscape GA 3 of 6 (FL0101-ALA-00-XX-DR-L-0012)
- Detail Landscape GA 4 of 6 (FL0101-ALA-00-XX-DR-L-0013)
- Detail Landscape GA 5 of 6 (FL0101-ALA-00-XX-DR-L-0014)
- Detail Landscape GA 6 of 6 (FL0101-ALA-00-XX-DR-L-0015)
- Access and Circulation Plan (FL0101-ALA-00-XX-DR-L-0005)

## Documents

- Application forms and certificates;
- Arboricultural Impact Assessment
- Lighting Schedule
- Coal Mining Risk Assessment
- Design and Access Statement
- Drainage Strategy
- Ecological Appraisal
- Energy Assessment and Environmental Strategy
- Flood Lighting Assessment
- Visual Impact Assessment
- Noise Impact Assessment
- Phase I Geo-Environmental Desk Study Report
- Phase II Geo-Environmental Assessment Report
- PAC Report
- Planning Statement (this document)
- Transport Assessment
- Travel Plan

## 5 Planning Policy

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### 5.1 The Development Plan

This Chapter sets out the national and local planning policy to be considered in the determination of the planning application.

Section 70(2) of the Town and Country Planning Act 1990 requires that in dealing with an application for planning permission a local planning authority “*shall have regard to the provisions of the development plan, so far as material to the application*”.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 adds “*if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.*”

The Development Plan is defined by Section 38(3) of the Planning and Compulsory Purchase Act 2004 (in Wales) as:

- “(a) the National Development Framework for Wales,  
(b) the strategic development plan for any strategic planning area that includes all or part of that area, and  
(c) the local development plan for that area.”

The Development Plan for the application comprises the following:

- Future Wales – The National Plan 2040 – National Development Framework (2021).
- Flintshire County Council Unitary Development Plan 2000-2015 – Written Statement (2011).
- Flintshire County Council Unitary Development Plan 2000-2015 – Proposals Map (2011).

#### 5.1.1 Future Wales – The National Plan 2040 – National Development Framework (2021)

Future Wales – The National Plan 2040 (Future Wales) was published in February 2021 is the new National Development Framework for Wales, replacing the Wales Spatial Plan, setting the direction for development in Wales to 2040. It is a development plan document 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.

It is a spatial plan, meaning it sets the direction for where Wales should be investing in infrastructure and development for the greater good of Wales and its people. It is the highest tier of the development plan and is focused on solutions to issues and challenges at a national scale. Strategic and Local Development Plans



are required to be in conformity with Future Wales and must be kept up to date to ensure they and Future Wales work together effectively. Planning decisions at every level of the planning system in Wales must be taken in accordance with the development plan as a whole.

The following Strategic and Spatial Choices policies are considered to be of relevance to the proposed development:

**Policy 1 – Where Wales will grow:** *“The Welsh Government supports sustainable growth in all parts of Wales. In three National Growth Areas there will be growth in employment and housing opportunities and investment in infrastructure. The National Growth Areas are:*

*1. Wrexham and Deeside*

*Each of these urban areas is economically distinctive, supporting a range of businesses, enterprises and universities, and offering culturally rich lifestyles to residents and visitors. They are internationally and nationally significant places and this strategy promotes their continued growth and regeneration.”*

**Policy 2 – Shaping Urban Growth and Regeneration – Strategic Placemaking:** *“The growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed use centres and public transport, and integrated with green infrastructure.”*

**Policy 6 – Town Centre First:** *“Significant new commercial, retail, education, health, leisure and public service facilities must be located within town and city centres. They should have good access by public transport to and from the whole town or city and, where appropriate, the wider region.”*

**Policy 9 – Resilient Ecological Networks and Green Infrastructure:** *“To ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure, the Welsh Government will work with key partners to:*

- *identify areas which should be safeguarded and created as ecological networks for their importance for adaptation to climate change, for habitat protection, restoration or creation, to protect species, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and*
- *identify opportunities where existing and potential green infrastructure could be maximised as part of placemaking, requiring the use of nature based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and well being.*

*In all cases, action towards securing the maintenance and enhancement of biodiversity (to provide a net benefit) the resilience of ecosystems and green infrastructure assets must be demonstrated as part of development proposals through innovative, nature based approaches to site planning and the design of the built environment.”*

**Policy 12 – Regional Connectivity** – *“Active travel must be an essential and integral component of all new developments, large and small. Planning authorities must integrate site allocations, new development and infrastructure with active travel networks and, where appropriate, ensure new development contributes towards their expansion and improvement. Planning authorities must act to reduce levels of car parking in urban areas, including supporting car free developments in accessible locations and developments with car parking spaces that allow them to be converted to other uses over time. Where car parking is provided for new non-residential development, planning authorities should seek a minimum of 10% of car parking spaces to have electric vehicle charging points.”*

The application site is located within the Wrexham and Deeside National Growth Area. **Policy 20 – National Growth Area – Wrexham and Deeside** outlines that *“Wrexham and Deeside will be the main focus for growth and investment in the North region. Strategic and Local Development Plans across the region must recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing and transport infrastructure. The Welsh Government will work with regional bodies and local authorities in the region and in neighbouring regions of England to promote and enhance Wrexham and Deeside’s strategic role and ensure key investment decisions support places in the National Growth Area and the wider region.”*

### 5.1.2 Flintshire County Council Unitary Development Plan 2000-2015 (2011)

The FCC UDP was adopted in 2011 and has a plan period of 2000-2015. It comprises a Written Statement and Proposals Map.

The aim of the UDP is to provide a framework for making rational and consistent decisions on planning applications and to guide development to appropriate locations. It contains a number of strategic, general and topic specific policies which should be taken into consideration in the formation of the proposed development and planning application. The policies of most relevance to the proposed development are set out below.

Although the adopted UDP became time expired at the end of 2015 it remains the adopted development plan for FCC until such time that the emerging LDP is adopted.

### The Proposals Map

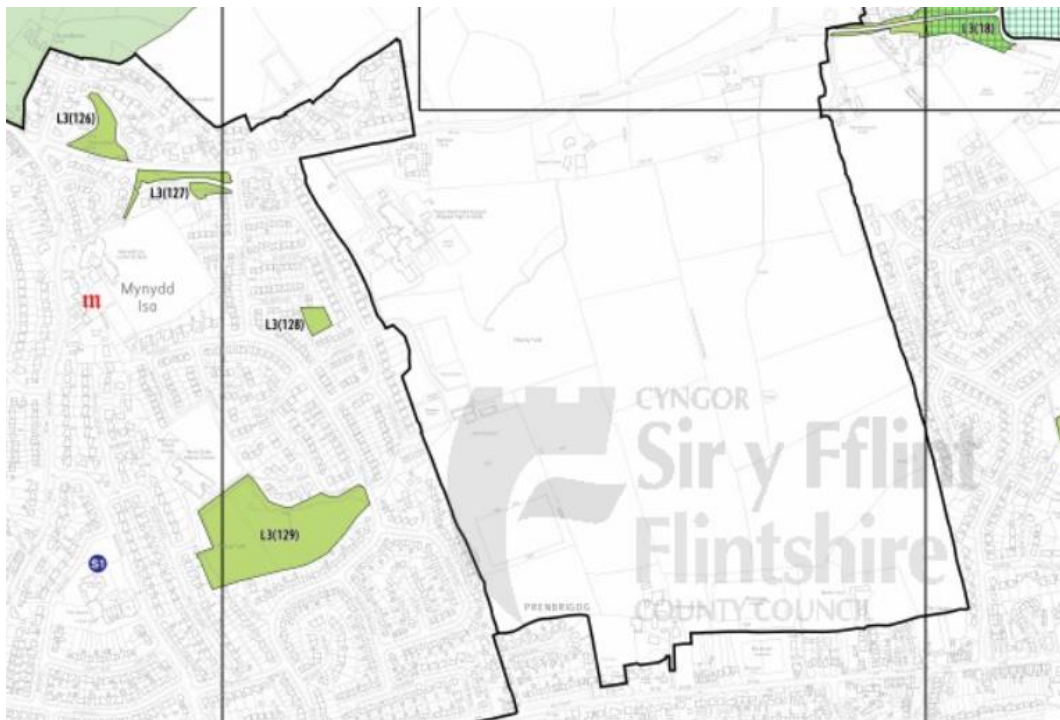
The Proposals Map from the adopted UDP indicates the following for the site:

- The site is located outside the Settlement Boundary (**Policy GEN2**), with Bryn Road to the north and the properties fronting onto Snowdon Avenue to the west forming the boundary of the Mynydd Isa settlement;
- The application site and land to the east and north forms a gap between the settlements of Mynydd Isa, Buckley and Alltomi;

- The site is within 500m of multiple Green Spaces (**Policy L3**) (126 - North of Bryn Road), L3 (127 - Adj. To Bryn Road), L3 (128 - Moelwyn Close), L3 (129 - Wat's Dyke Infants School) and L3 (133 - Heol Fammau Park); and
- The site is located approximately 600m to the northeast of Local Centre Mynydd Isa – The Square (**Policy S1**).

The site has no other land use or planning designations but is surrounded by residential development to the north and west and agricultural land to the south and east. Figure 7 is the relevant extract from the Proposals Map.

Figure 7 Proposals Map extract



## Written Statement

The Written Statement of the UDP contains a number of strategic, general and topic specific policies of relevance to the proposed development as outlined below.

## Strategic Policies

The Strategic Policies within the plan are the key guiding policies on major issues or topic areas and provide a strategic policy framework for the more detailed policies in Part II of the Plan.

The relevant UDP strategic policies are as follows:

- STR1 New Development
- STR2 Transport and Communications
- STR7 Natural Environment

- STR8 Built Environment
- STR9 Welsh Language and Culture
- STR10 Resources
- STR11 Sport, Leisure and Recreation

## General and Detailed Policies

In addition to the Strategic Policies the adopted UDP contains a number of general policies which define the general requirements and highlight the criteria which all development proposals should address to ensure that future development patterns reflect the needs and priorities of Flintshire's communities.

The relevant UDP general and detailed policies are as follows:

- GEN1 General Requirements for Development
- GEN2 Development Inside Settlement Boundaries
- GEN3 Development in the Open Countryside
- GEN4 Green Barriers
- GEN5 Environmental Assessment
- GEN6 Welsh Language and Culture
- D1 Design Quality, Location and Layout
- D2 Design
- D3 Landscaping
- D4 Outdoor Lighting
- D5 Crime Prevention
- D6 Public Art
- TWH1 Development Affecting Trees and Woodlands
- TWH2 Protection of Hedgerows
- L1 Landscape Character
- L3 Green Spaces
- WB1 Species Protection
- WB5 Undesignated Wildlife Habitats
- HE7 Other Sites of Lesser Archaeological Significance
- HE8 Recording of Historic Features
- AC1 Facilities for the Disabled
- AC2 Pedestrian Provision and Public Rights of Way
- AC3 Cycling Provision
- AC4 Travel Plans for Major Traffic Generating Developments

- AC5 New / Improvements to Public Transport Facilities
- AC8 Buses
- AC15 Traffic Management
- AC23 New Development and Interference with Telecommunications Signals
- AC24 Cable Installation
- SR1 Sports, Recreation or Cultural Facilities
- SR4 Protecting Recreational Open Space
- CF1 Retention of Existing Facilities
- CF2 Development of New Facilities
- EWP1 Sustainable Energy Generation
- EWP2 Energy Efficiency in New Development
- EWP3 Renewable Energy in New Development
- EWP7 Managing Waste Sustainably
- EWP9 New Development and Waste Management Facilities
- EWP12 Pollution
- EWP13 Nuisance
- EWP14 Derelict and Contaminated Land
- EWP16 Water Resources
- EWP17 Flood Risk
- IMP1 Planning Conditions and Planning Obligations

## 5.2 Material Planning Considerations

As required by Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 applications are to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

The other policy and guidance documents that form material considerations in the determination of this planning application are:

- Emerging FCC Local Development Plan 2015 – 2030 – Deposit Plan (2019)
- FCC's adopted Supplementary Planning Documents:
  - SPGN No.3 Landscaping;
  - SPGN No.4 Trees and Development;
  - SPGN No.8 Nature Conservation and Development;
  - SPGN No.11 Parking Standards;
  - SPGN No.12 Access for All;
  - SPGN No.24 Retention of Local Facilities; and
  - SPGN No.30 Public Art.

- Planning Policy Wales – Edition 11 (2021)
- Building Better Places (2020)
- Technical Advice Notes (TAN)
  - TAN 5: Nature Conservation and Planning;
  - TAN 11: Noise;
  - TAN 12: Design;
  - TAN 15: Development and Flood Risk (of note TAN 15 is due to be updated in Summer 2021 with a new national flood model for Wales which may have implications for sqm at the site);
  - TAN 16: Sport, Recreation and Open Space;
  - TAN 18: Transport;
  - TAN 20: Planning and the Welsh Language; and
  - TAN 21: Waste.

### 5.2.1 Emerging FCC Local Development Plan 2015-2030 – Deposit Plan (2019)

FCC are currently in the process of preparing their new LDP the Flintshire LDP covering the period 2015-2030. The emerging LDP is at an advanced stage with the Deposit LDP having been submitted for examination in October 2020 and the Examination Hearing Sessions took place between 13 April 2021 and 28 May 2021.

The Revised Delivery Agreement (July 2020) for the LDP targets the adoption of the plan in November 2021, meaning it could be adopted during the determination of the planning application for the Mynydd Isa Campus.

Due to the advanced stage of preparation, the emerging LDP and its supporting evidence could be used as material planning considerations when determining the planning application. Particularly given the age of the adopted UDP.

The policies and proposals map from the emerging LDP have therefore been reviewed in the context of the site and the following policies are of relevance to the proposed development and should be considered alongside the adopted policies in the design development.

### The Proposals Map

The Proposals Map from the emerging LDP as shown in Figure 8 indicates the following for the site:

- The application site is located outside the Settlement Boundary (**Policy PC1**), with Bryn Road to the north and the properties fronting onto Snowdon Avenue to the west still forming the boundary of the Mynydd Isa settlement; and
- The site and land to the east and north forms a gap between the settlements of Mynydd Isa, Buckley and Alltomi and on the emerging LDP Proposals Map partly allocated for Renewable Energy (**Policy EN13**) although the application site is not within this land use allocation.



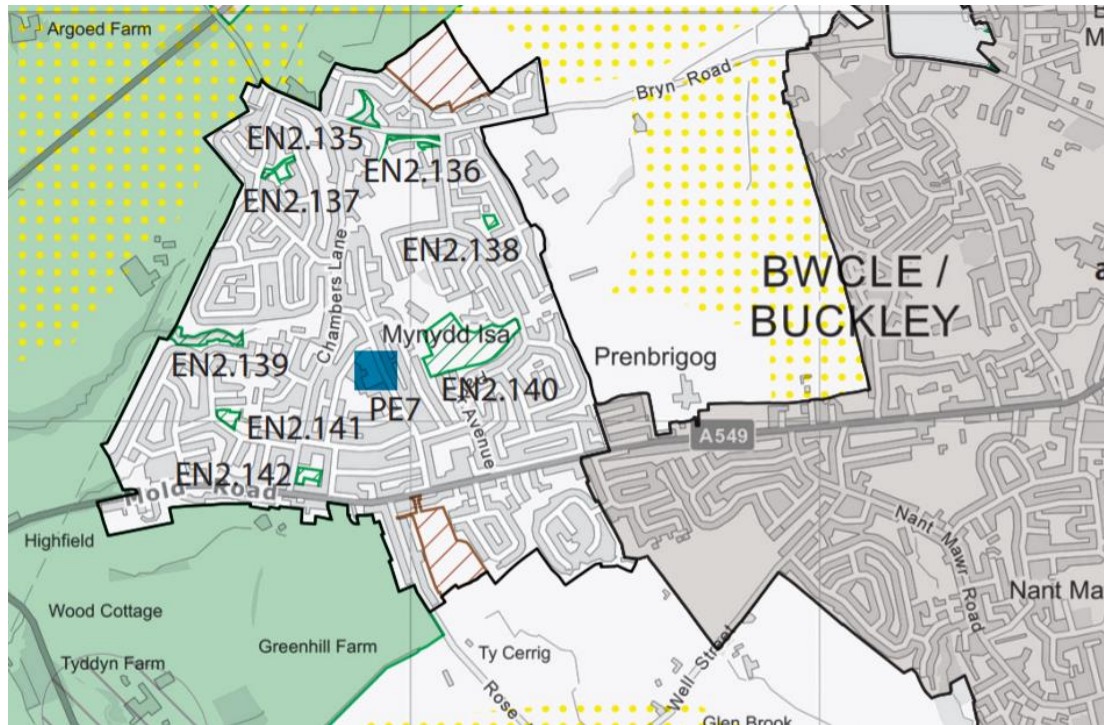


Figure 8 Emerging LDP – Proposals Map Extract

## The Written Statement

The majority of the policies within the emerging LDP are the same or very similar to the policies within the UDP, and given these remain the extant development plan policies for the purposes of decision making during the period between submission of a draft LDP for examination and its adoption, the detailed wording of the conditions has not been summarised within this Statement.

A list of relevant emerging LDP policies are as follows:

- STR4: Principles of Sustainable Development, Design and Placemaking;
- STR5: Transport and Accessibility;
- STR6: Services, Facilities and Infrastructure;
- STR7: Economic Development, Enterprise, and Employment;
- STR13: Natural and Built Environment, Green Networks and Infrastructure;
- STR14: Climate Change and Environmental Protection;
- STR15: Waste Management;
- PC1: The Relationship of Development to Settlement Boundaries;
- PC2: General Requirements for Development;
- PC3: Design;
- PC4: Sustainability and Resilience of New Development;
- PC5: Transport and Accessibility;
- PC6: Active Travel;

- PC7: Passenger Transport;
- PC12: Community Facilities;
- EN1: Sports, Recreation and Cultural Facilities;
- EN4: Landscape Character;
- EN7: Development Affecting Trees, Woodlands and Hedgerows;
- EN12: New Development and Renewable and Low Carbon Energy Technology;
- EN14: Flood Risk;
- EN15: Water Resources;
- EN17: Development of Unstable Land;
- EN18: Pollution and Nuisance; and
- EN19: Managing Waste Sustainably.

### 5.2.2 Planning Policy Wales – Edition 11 (2021)

Published in February 2021, the eleventh edition of Planning Policy Wales (PPW11) sets out the land use planning policies of the Welsh Government. PPW11 has been prepared in the light of the Well-being of Future Generations (Wales) Act 2015 (WFGA), the objectives of which represent the central thread running through the document and has recently been updated to reflect the publication of Future Wales.

The central thread of the WFGA remains within the PPW11, which also focuses on the multi-faceted concept of Placemaking. This relates to the delivery of Sustainable Places to support the well-being of people and communities across Wales. The interlinkages between key planning principles (such as growing the economy in a sustainable manner, making the best use of resources, facilitating healthy and accessible environments, creating and sustaining environments, and maximising environmental protection) and the “five ways of working” (prevention, long term, collaboration, integration and involvement) should be integrated within the plan-making and development management processes. It is stated that this approach will contribute both to Placemaking and well-being.

PPW11 reaffirms the presumption in favour of sustainable development and requires an improvement in the delivery of all four aspects of well-being: social, economic, environmental and cultural, as set out within the WFGA.

PPW11 highlights the importance of proposals taking a placemaking approach, specifically, guiding proposals to take a holistic approach when planning and designing development and spaces, focusing on positive outcomes. The concept of placemaking should be considered at all levels including at a global scale through paying key consideration to climate change; and also, at a more local scale, considering the amenity impact on neighbouring properties and people.



In line with the principles of the Well-being Act, PPW11 is organised around four key themes; ‘Strategic and Spatial Choices’, ‘Active and Social Places’, ‘Productive and Enterprising Places’ and ‘Distinctive and Natural Places’.

**Chapter 3 ‘Strategic and Spatial Choices’** focuses on placemaking and strategic development. Paragraphs 3.3 - 3.13 of the PPW11 set out five key objectives to achieving good design: *“access and inclusivity; environmental sustainability; character; community safety; movement”*.

Paragraph 3.7 sets out that *“developments should seek to maximise energy efficiency and the efficient use of other resources (including land), maximise sustainable movement, minimise the use of non-renewable resources, encourage decarbonisation and prevent the generation of waste and pollution.”*

Paragraph 3.9 sets out that *“the special characteristics of an area should be central to the design of a development. The layout, form, scale and visual appearance of a proposed development and its relationship to its surroundings are important planning considerations.”*

Paragraph 3.30 sets out the Sustainable Management of Natural Resources (SMNR) framework as outlined within The Environment (Wales) Act 2016. PPW11 states that, *“amongst other considerations, the planning system can contribute to the SMNR approach through ensuring resilient locational choice for infrastructure and built development, taking actions to move towards a circular economy and facilitate the transition towards economic decarbonisation”*.

Paragraph 3.55 sets out that *“Previously developed (also referred to as brownfield) land...should, wherever possible, be used in preference to greenfield sites where it is suitable for development.”*

In terms of the provision of new infrastructure, Paragraph 3.62 states that, *“planning authorities should, in conjunction with key providers, take a strategic and long-term approach towards the provision of infrastructure as part of plan making. This may involve collaboration between planning authorities and key infrastructure providers to ensure infrastructure provision is sustainable”*.

Paragraph 3.61 refers to the need for adequate and efficient infrastructure, such as *“education facilities, as crucial for economic, social and environmental sustainability”*. It states how infrastructure which is poorly designed or badly located can exacerbate problems rather than solving them.

**Chapter 4 ‘Active and Social Places’** outlines components of placemaking required to create well connected and cohesive communities covering the following:

- Transport;
- Housing;
- Retail & commercial development;
- Community facilities; and
- Recreational spaces.

With regards to transport, paragraph 4.1.1 states that people should have access to jobs and services through more efficient and sustainable journeys, by walking, cycling and public transport. PPW11 further states that *“new development should prevent problems from occurring or getting worse such as...the reliance on the private car and the generation of carbon emissions.”*

It is a priority of Welsh Government to reduce reliance on the private car and support a modal shift to walking, cycling and public transport. PPW11 states that *“Delivering this objective will make an important contribution to decarbonisation, improving air quality, increasing physical activity, improving the health of the nation and realising the goals of the Well-being of Future Generations Act”* (paragraph 4.1.9). The Sustainable Transport Hierarchy for Planning illustrates how development proposals must seek to prioritise walking, cycling and public transport ahead of the private motor vehicles. The Sustainable Transport Hierarchy for Planning, as presented within PPW11, is illustrated within Figure 9.

Within paragraph 4.1.38, the role of public transport in the sustainability of places is underlined, stating that *“it enables people to undertake medium and long journeys without being dependent on having access to a car.”* In addition to this, paragraph 4.1.37 states that *“Planning authorities must ensure the layout, density and mix of uses of new development support the use of public transport and maximises accessibility potential.”*

PPW11 also encourages the use of Ultra Low Emission Vehicles (ULEVs) and the provision of ULEV charging points as part of new development. Whilst referencing Future Wales for the specific requirements, paragraph 4.1.41 states that *“The provision of electric vehicle charging points should be planned as part of the overall design of a development. Charging points must not cause an obstruction to walking or cycling, should be resistant to vandalism, and located where there is good lighting and natural surveillance.”*

In relation to community facilities, paragraph 4.4.1 states that they *“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.”* Community facilities are noted to include schools.

With regards to recreational spaces, paragraph 4.5.4 states *“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.”*

**Chapter 5 Productive and Enterprising Places** deals with the economic components of placemaking. These places are designed and sites to promote healthy lifestyles and tackle the climate emergency. This is done by making them: easy to walk and cycle to and around’ accessible by public transport; minimising

the use of non-renewable resources; and using renewable and low carbon energy sources.

Paragraphs 5.8.1 and 5.8.2 states 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. The Welsh Government’s policy is to secure zero carbon buildings while continuing to promote a range of low and zero carbon technologies as a means to achieve this.”*

**Chapter 6 Distinctive and Natural Places** covers environmental and cultural components of placemaking. PPW11 sets out how development must protect the special characteristics of the natural and built environment including the historic environment, green infrastructure, landscape biodiversity and ecological networks.

Green infrastructure is considered core to the creation and management of distinctive and natural places. PPW11 states that green infrastructure assets and networks should be protected owing to their multi-functional roles such as providing benefits for the health and well-being of communities as well as the environment (paragraph 6.2.4).

Paragraph 6.4.3 gives focus to biodiversity and ecological networks and sets out a number of considerations for development proposals to consider. This includes that development proposals must consider the need to *“support the conservation of biodiversity, in particular the conservation of wildlife and habitats”* (paragraph 6.4.3).

Paragraph deals with biodiversity and ecological networks and states *“The Environment (Wales) Act 2016 introduced an enhanced biodiversity<sup>119</sup> and resilience of ecosystems<sup>120</sup> duty (Section 6 Duty). This duty applies to public authorities in the exercise of their functions in relation to Wales and will help maximise contributions to achieving the well-being goals.”*

The Section 6 Duty requires *“Planning authorities to maintain and enhance biodiversity in the exercise of their functions. This means development should not cause any significant loss of habitats or populations of species, locally or nationally and must provide a net benefit for biodiversity.”*

The contribution of good air quality to the quality of places and health and well-being is underlined in paragraph 6.7.19. PPW11 states how it can be inappropriate to locate sensitive uses such as schools adjacent to busy roads where no connectivity benefits can be gained and where health and amenity impacts will be unacceptable.

## 5.2.3 Building Better Places (2020)

In July 2020 Welsh Government published its policy position on how the planning system can assist in the COVID-19 recovery period. ‘Building Better Places’ is intended to sit alongside PPW11 and is a key consideration in both plan preparation and development management. ‘Building Better Places’ expands on

the letter issued to Chief Planning Officers from Julie James (Minister for Housing and Local Government) in July 2020 which acknowledges that the economic consequences of the COVID-19 pandemic are predicted to be severe and felt across all sectors, including those in construction and the built environment. 'Building Better Places' emphasises both the primacy of the plan led system in Wales but also the need to have places and place-making at the heart of the recovery process. The policy agenda seeking to deliver better places and placemaking develops the principles already enshrined in PPW11. The pandemic has highlighted the importance of the need for good quality places for people to live, work and relax. 'Building Better Places' seeks to ensure that the economic hardship owing to the pandemic does not outweigh the above principles and policies.

It is clear that an immediate supply of development land is essential if we are to build the better places envisaged by Welsh Government and lead the recovery that is desperately required. New development delivering positive social and economic outcomes as well as addressing climate change concerns needs to be happening on the ground in the short term and cannot simply await the completion of the LDP review process in five years' time.

Welsh Government has recognised this issue and in respect of development management, 'Building Better Places' states *"PPW and the NDF can be used directly in the decision making process. The WG will support decisions taken in this context, particularly in the short-term until an LDP is adopted"*. This is a very important concession and allows for new development in the short term that truly embrace the principles and policies of delivering better places and placemaking.

The guidance includes a Welsh Government commitment to follow through on infrastructure obligations which will go a long way in ensuring that the developments envisioned are delivered and the wider public benefits are maximised.

It also emphasises that development management decisions should focus on creating healthy, thriving active places with a focus on a positive, sustainable future for our communities. The planning system has an important role in supporting healthier lifestyles and reducing inequalities.

## 5.2.4 Technical Advice Notes

The following TANs are of relevance to the proposed development.

- TAN 5: Nature Conservation and Planning;
- TAN 11: Noise;
- TAN 12: Design;
- TAN 15: Development and Flood Risk (of note TAN 15 is due to be updated in Summer 2021)
- TAN 16: Sport, Recreation and Open Space;
- TAN 18: Transport;

- TAN 20: Planning and the Welsh Language; and
- TAN 21: Waste.

## 6 Planning Assessment

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### 6.1 Introduction

This Chapter sets out the key planning considerations that should be taken into account in the determination of the planning application for the redevelopment of the Argoed High School site.

Key policy considerations are summarised below into key themes and presented with an explanation of how the proposed development aligns with local and national adopted planning policy.

The proposals are considered to be in overall accordance with the UDP, Future Wales and Development Plan as a whole. They are further considered to accord with the relevant policies from **PPW11** and the emerging LDP which form material planning considerations. Given that **PPW11** has been prepared in accordance with the WFGA and embodies its central themes, it is further considered that conformity with **PPW11** demonstrates alignment with the WFGA.

### 6.2 Principle of Development

#### Established use on the Application Site

Given the site's existing use as a community facility/school, **Policy CF2** and **Policy PC1** of the UDP and **Policy PC12** of the emerging LDP are relevant to the proposed development and can therefore be used to establish the principle of development at the site, despite being located outside the settlement boundary.

The proposals also align with **Policy CF1** through the provision of a new school and providing suitable alternative provision as part of the proposed development. Furthermore, given the proposed development comprises the redevelopment of existing education facilities and primarily serves the village catchment of Mynydd Isa, it is not considered that the development would be defined as significant education development in accordance with **Policy 6** of Future Wales and its location within Mynydd Isa is therefore considered to be acceptable.

It is also noted that within the emerging LDP, land to the east of the site is partly allocated for Renewable Energy under **Policy EN13**. However, it is considered that by virtue of the site's topography and orientation the proposed development would not preclude development of solar energy infrastructure on adjacent land.

#### Sports and Recreational Use

Part of the application site is currently used for playing fields and the UDP seeks the retention of playing fields through **Policy STR11** and **Policy SR4**.

Whilst the proposed development would result in the loss of circa 7,997sqm of sports fields at the east of the site, these fields do not meet current recommended pitch requirements (as confirmed by Sport Wales through pre-application engagement) due to the gradient in this part of the site and are only partly marked

out as a formal sports pitch. While there would be a net loss of playing field space, it is considered proposals compensate this loss through the provision of new dedicated and enhanced sports facilities.

In addition to the main school building, several school sports and recreation facilities are proposed. Full details of the proposed sports provision are set out in Section 4.2.2, however in summary, this would include 5no. floodlit hardstanding MUGAs, a floodlit AWGP, a grass football pitch, a running track and a sports hall. The AWGP would accommodate 3no. 5 aside football pitches and 5no. MUGAs would replace the 3no. existing MUGAs at the site. Each of these elements has been designed with full consideration of relevant sections of BB98, BB99 and BB103, which set out the building framework guidance for schools, including for external sports facilities.

It is therefore considered that the loss of the playing fields would be offset by the proposed enhancements and retention of sports facilities, which would still result in 29,267sqm of playing field area including a new AWGP and new grass football pitch plus the retention of the existing grass sports pitches at the south of the site as shown in Figure 6 in 4.2.2.

## 6.3 Policy Considerations

### 6.3.1 Design

In accordance with **Policy D1** for major developments, a Design and Access Statement and detailed drawings including floor plans, sections and elevations are submitted in support of the planning application to articulate the details of the proposed development in relation to materials and design.

The proposed development would be organised with the primary school to the north of the site nearest the entrance from Bryn Road, and the secondary school placed to the south of the site adjacent to the playing fields. Halls and sports spaces would be located to the western side of the building, in close proximity to the main entrance and the public site approach for wider community access. A car park and drop off facility would be located at the north of the new building.

The site layout has been designed to work with the site constraints and provide a new campus that would enable the two schools to function cohesively, whilst taking advantage of the opportunity to provide private and shared external spaces between the two schools.

The school building itself has been designed to benefit from good natural environmental conditions through maximising natural ventilation and natural lighting of spaces whilst minimising summer overheating.

The design of proposed car parking is as such that it would be broken into smaller fragments to reduce the impact of this component along the frontage of the school.

The design approach for the main school building takes influence from agricultural barns and small holdings which are simple and adaptable building forms. The architectural mass and roofscape echo architectural forms found across



Flintshire. The design adopts motifs such as asymmetric roofs, materiality wrapped from roof to walls, use of robust materials such brick and metal, panelised arrangement of the elevations and stepped brick bonding to gable walls.

Proposed materials are as set out within the Design and Access Statement and on the Typical Bay Studies drawings, these are as follows:

- Red Brick – providing a robust ground floor plinth to areas of aluminium cladding and used on the end gables, up to first floor level. This has been chosen for its robustness and affordability;
- Aluminium standing seam – used to clad all expressed roofs and wrapped down onto external walls and feature chimneys;
- Red metal work – the preferred colour for window and door framework and ancillary trims, with the colour of the masonry selected to reference red brick which is common in the surrounding area;
- Glass – provided with solar control coating and a neutral appearance; and
- External glazed canopies above GF lower primary play space.

The materials listed above have been selected as they are considered sympathetic to the character and context of the site and would create an attractive and high-quality design that is considered to enhance the site and sense of place, in line with **Policy PC3**.

Material choice has been heavily influenced by the rethinking of agricultural buildings and as such the principal materials are brick and aluminium standing seam. Varying brickwork bond patterns would be used on the gable walls to add articulation and relief, such as stacked bonded brickwork above window heads and stepped Flemish bond brickwork patternation. Aluminium standing seam folds would be set to align with the window placement and would create shadow and depth across the facades.

The site has also been designed to limit impact on the surrounded ‘Indicative Local Search Area for solar farms of 5MW and above’ identified in the emerging LDP under **Policy EN13**. Whilst this search area does not encroach on to the application site, the proposed design would not prejudice development of any future solar farm through issues of overshadowing; and this is demonstrated on detailed drawings, enclosed with the planning application.

Crime prevention is a material planning consideration and FCC are bound by the joint North Wales Police/Flintshire County Council Crime & Disorder Reduction Strategy. Crime prevention measures have been incorporated into the proposals in accordance with **Policy D5**, the layout of the proposed development, along with physical security features such as CCTV seek to prevent harm within the site. The schools would be connected by a joint main entrance and reception, which would act as the principal secure gateway front onto the site’s secure area and control access to the non-secure areas of the site. Overall, the design has been developed to a degree appropriate to the sensitivity of the proposed end use as an educational facility and has been informed by early correspondence with a Designing Out Crime Officer for North Wales Police, who provided an initial security strategy appraisal.

As part of the proposed development, a public art mural would be incorporated within the designs through consultation with school pupils and as part of WEPCo's community benefits plan, in accordance with **Policy D6**. The details of the public art strategy could be secured via condition.

The proposed design of buildings and spaces has been led by a key design principle to support the new Welsh curriculum for schools and colleges. The Design and Access Statement further demonstrates how this requirement has been considered, including through use of creative and flexible learning spaces within the proposed development in accordance with **Policy STR9** and **Policy GEN6**.

### 6.3.2 Sustainability and Climate Change

A key design principle driving the proposed development includes efficiency and net zero carbon measures. The proposed design would be net zero carbon in operation.

As discussed in section 4.2.6, the development has been designed to meet a strict operational net zero carbon target, whereby an equivalent amount of operational energy consumed on site (both regulated and unregulated) would be generated by an extensive roof mounted solar photovoltaic array. This array would enable the proposed development to offset 100% of the carbon emissions annually for the energy usage of the building, therefore being 'net zero carbon' in operation in line with the UK Green Building Council framework definition<sup>6</sup>.

As such, it is considered that the proposed development would excel the policy requirements set by **Policy EWP2**, accord with emerging LDP **Policy STR14** and contribute towards Welsh Government commitments to achieving net zero by 2050, as set out in **PPW11**.

Whilst it is acknowledged that the proposed development would include an element of greenfield land as defined in **PPW11**, the majority of the development would be located on brownfield land and it is considered that the benefits for the environment, in terms of being a Net Zero Carbon development in an area of lower ecological value, would significantly outweigh the loss of green space and accord with **Policy STR10**.

An Energy Assessment (to include a BREEAM pre-assessment) for the proposed development is submitted in support of the planning application, in accordance with emerging LDP policy. This demonstrates how the proposed design will meet and exceed the UDP policy requirements of **Policy EWP2**, **Policy EWP3** and **Policy STR10**.

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<sup>6</sup> UK GBC (2019) Net Zero Carbon Buildings: A Framework Definition  
<https://www.ukgbc.org/wp-content/uploads/2019/04/Net-Zero-Carbon-Buildings-A-framework-definition.pdf>

### 6.3.3 Transport and Access

As detailed within the Transport Assessment submitted with the planning application, junction modelling and highway impact assessments have been undertaken and indicate that no highway improvement works are required.

The proposed layout as depicted on Site Layout Plan would include as its main vehicular access the existing access off Bryn Road, with alterations to the internal layout to provide a formalised access so that the development would not compromise the safe, effective and efficient use of the highway network and would not have an adverse impact on highway safety, in line with **Policy AC13** and **Policy AC4**.

Pedestrian and cycle access would continue to be gained off Bryn Road via two dedicated shared paths to the entrance of the school and the existing shared path off Snowdon Avenue to the south-east of the site would be retained as part of the proposals. As such, the proposed development would interface well with the existing active travel network and through the provision of cycle parking on-site, as detailed below, it is considered that modal share for travel to the school would likely shift from the existing baseline (1-2% cycling across Argoed High School and Mynydd Isa Primary School, to up to 8% cycling mode share within the proposed development) in line with **Policy 12** of Future Wales, **Policy STR2** of the UDP and **Policy PC5** and **Policy PC6** of the emerging LDP. Further details of the predicted mode share uplift from the existing survey to opening and 5 years post- Travel Plan implementation are set out within the Campus Travel Plan, which is submitted with the planning application.

The effects of development with regards to transport are a key consideration for the proposed development given the site's expansion and the relocation of the Mynydd Isa Primary School. The Transport Assessment concludes that given both schools are already located within Mynydd Isa, with associated traffic already on the network, there would be a modest uplift in capacity and a slight change in the distribution of trips at Mynydd Isa Campus. As such, the proposed development is not expected to have a significant effect in terms of transport and access.

The Transport Assessment and Campus Travel Plan further detail elements of the scheme including integration with public transport links, deliveries and refuse collection, traffic management and emergency service areas. Both of these technical documents focus on positively influencing sustainable and active travel, including through the reduction of single car occupancy trips, to comply with **Policy AC4** and **Policy AC13**, alongside emerging LDP **Policy PC7**. This demonstrates how the development aligns with The Sustainable Transport Hierarchy for Planning set out in **PPW11**.

The Parking Standards SPG sets out the cycle and car parking standards for community uses in line with **Policy AC3** and **Policy AC18**. Developments should also meet the needs of all people with disabilities in accordance with **Policy AC1**, including for parking provision.

FCC's standards require the following maximum levels of car parking:

- Primary and Secondary Schools - 1.5 spaces per classroom; and,

- Nursery Schools - 1 space per 25sqm and 1 space per staff.

The proposed development would have a total of 60 classrooms for the primary and secondary schools and a maximum of 5 staff for the proposed nursery (circa 50sqm floorspace) which suggests a maximum requirement of 97no. parking spaces to accord with standards.

The proposals however include 124no. permanent car parking spaces located to the north west of the main school building, comprising 112no. general, 1no. minibus and 12no. disabled persons car parking spaces, which would be located in a dedicated area closest to the main school entrance on the western side of the main school building.

The reason for the uplift of circa 27no. spaces above the maximum parking standards, is justified in the Transport Assessment on the basis of the findings of the April 2021 transport survey. This survey indicated that 85% of staff travelled to the site by car, meaning that based on existing travel patterns circa 130no. car parking spaces would be required at the site.

However based on the future forecast travel patterns, the Travel Plan is seeking to reduce car trips by 15%, which would reduce the car parking requirements at the site to circa 107no. car parking spaces, a demand of 17no. spaces less than the existing situation.

Therefore, on the basis of the future forecast it is considered that the 124no. car parking spaces including blue badge spaces and visitor parking is justified at the site. This figure whilst exceeding the policy requirement is considered to be acceptable on balance because it only exceeds the policy maximum by 27no. spaces and responds directly to future forecasts, it would also seek to reduce any potential negative impacts of overspill / on-street parking from staff or visitors.

10% of car parking spaces would also be electric vehicle charging spaces and the remainder of spaces would be provided with passive charging with the ability to be converted in the future, in alignment with Future Wales **Policy 12** for major non-residential developments and **Policy PC5** in the emerging LDP.

The proposals also seek to reduce / mitigate potential on-street congestion by improving the capacity of the pick-up and drop-off facility by circa triple the existing situation (currently capacity for 20 spaces) located off Bryn Road as part of a flow system that would also permit coach and mini-bus circulation. This element of the proposed development is anticipated to accommodate peak drop off / pick up times and mitigate any potential impacts on Bryn Road.

As outlined in the Campus Travel Plan, the drop-off and pick-up area has been designed to accommodate the predicted number of vehicle trips based on future year modal split (i.e. not to accommodate current level of trips on the basis that this will not induce a change in travel habits).

In relation to cycle parking the Parking Standards SPG sets out that FCC requires a minimum of 4 spaces per classroom, meaning that for the 60 classrooms proposed a minimum requirement of 240no. cycle spaces is required in line with policy.

The proposals however include the provision of 105no. cycle parking spaces (90no. for pupils and 15no. for staff) and like with the car parking provision, this number has been defined in accordance with the Campus Travel Plan. As part of the Campus Travel Plan, it is envisaged that up to 90 children could travel by bicycle in the future. However, the Travel Plan is committed to monitoring this number and should more need arise more cycle parking could be provided.

The transport survey also identified that currently very little or no staff travel to the site by bike, however the Campus Travel Plan aims to increase this number by 10%, resulting in circa 15 members of staff travelling by bike in the future. The 15no. staff cycle parking spaces would be located in the main cycle parking area and staff changing facilities are provided as part of the proposals. As with the pupil parking provision, the Campus Travel Plan also provides the ability to monitor the level of cycling to the school and provide additional spaces if needed. It is therefore considered that on balance and in line with the current situation and future forecast the shortfall in cycle spaces at the site is justified.

With regards to deliveries, refuse collection and coaches, the Transport Assessment states that it is expected that there would be no net increase in deliveries as these trips are already on the local network serving the other school sites. Due to the amalgamation of three sites, there could even be the opportunity to reduce the overall number of trips by HGV's which offers an improvement to the existing situation.

In conclusion, the Transport Assessment indicates that there are no transport or highways reasons to refuse the application. It is considered that overall, the proposed development satisfies the policy requirements of Future Wales, the UDP and emerging LDP with respect to issues of transport and accessibility.

### 6.3.4 Residential Amenity

The application site is surrounded by residential properties to the west (off Snowdon Avenue) and north (off Bryn Road). Impacts for residential amenity have been considered throughout the design development, namely, siting, scale and massing of the campus building, and landscaping proposals that would provide natural screening.

The orientation of the proposed main school building is proposed as such that it is set back from Bryn Road and is located further than the existing Argoed High School building in relation to Snowdon Avenue. The location of the buildings would also maintain access to High Field Farms and the buildings would be located in a lower part of the site, away from residential properties to reduce impacts on residential amenity.

The scale and massing of the proposed development in terms of footprint and height are considered appropriate for the site and given its size and current use as an educational facility. The proposed school would be two storeys in height, comparable to the existing school building, also two storeys in height. The surrounding residential properties vary in height from 1.5 storey bungalows to two storey detached and semi-detached homes.

The existing building also sits at the higher part of the site and therefore appears taller in the context of the nearest bungalows, however due to the topography and surrounding mature vegetation, visibility of the site is relatively limited. The proposed building would also benefit from the mature vegetation surrounding the site and would set further down within the site away from residential properties and therefore views of the building from near and further afield are also reduced.

The Visual Impact Assessment concludes that given the size of the site, the proposed separation distances between existing and proposed development, plus the site's topography which falls west to east and north to south, potential impacts of overlooking, overshadowing and overbearing from the new school buildings would be minimal.

Moreover, in response to some local residents concerns, the AWGP has been reduced from the original dimensions submitted with the EIA screening request, and is proposed on the site of the existing school buildings, parallel to but set back circa 45m from the rear gardens of properties fronting onto Snowdon Avenue. This location is based upon conclusions of an optioneering assessment, which confirmed that this siting would be the most optimal when appraised against others considered across the site. Details of this optioneering process are included within the Design and Access Statement, submitted with the application.

As detailed on the Landscape Masterplan and Planting Strategy, natural screening would be provided in the form of tree planting (mixture of avenue, multi-stem and parkland species) along the western boundary of the site with Snowdon Avenue.

As detailed on the Proposed Ground and First Floor Plans, windows are primarily concentrated on the southern elevations and within the 'finger' arrangements. No windows are proposed on the western and eastern elevations of the 'fingers' (i.e. the ends), only access points. This has the overall outcome of reducing effects of overlooking between residential properties particularly to the west off Snowdon Avenue.

Windows are proposed on the northern elevation and main entrance, however the existing hedgerow screening along the northern boundary, in combination with planting measures (as detailed on the Planting Strategy) are considered to act as natural barriers which would prevent overlooking and overbearing issues from Bryn Road. It is therefore considered that the proposed development would accord with **Policy GEN1** and **Policy PC2**.

The following sections detail how other amenity considerations relating to lighting and noise have been considered within the application.

### 6.3.5 Lighting

A Flood Lighting Assessment (FLA) has been prepared in support of the planning application, to assess the baseline lighting environment and the impact of the proposed lighting and flood lighting on residential amenity and identify any mitigation measures required in line with **Policy D4**.

The FLA confirmed that application site is located within Environmental Zone E3 'Suburban', given Mynydd Isa comprises a well inhabited rural village settlement,

It also concluded that the AWGP and MUGAs would include floodlighting that is below the specified maximum limits for Environmental Zone E3 ‘Suburban’, whereby medium district brightness is permitted as a lighting environment.

The proposed design would achieve a compliant upward light ratio (ULR) appropriate for this zone (2.5%, compared to the maximum value of 5% for E3 areas). This would limit skyglow effects experienced through use of the AWGP and MUGAs and ensure that light spill for residential properties would not be of an adverse nature for residential amenity.

Moreover, luminaire beams located on the AWGP and MUGAs would not be tilted more than an angle of 70 degrees from vertical measurement and as such the fittings would be compliant in terms of upward tilt effects.

External lighting design is concluded to comply with the maximum values of illuminance allowed to reach nearby properties from the campus, both during school operational hours and for out of hours use. Detailed assessment results are shown in Appendix C of the FLA, which demonstrate that the current external lighting design complies with the required illuminance criteria.

Lighting would therefore be sympathetic to the surrounding area to prevent impacts on residential amenity, whilst fulfilling the requirements for the pitch and security. The proposed design for lighting within the development is illustrated on the Lighting Schedule, submitted in support of the planning application. The proposed lighting layout is set out on the Appendix A of the Flood Lighting Assessment - External Lighting Layout.

The proposed development is therefore considered to accord with the requirements of **Policy D4** and emerging **Policy EN18** in relation to lighting design.

### 6.3.6 Noise

In consultation with the Pollution Control Team at FCC it has been agreed that noise from the proposed AWGP should be limited to no more than 50dB LAeq in the nearest gardens on Snowdon Avenue and in the absence of Sport Wales guidance, in accordance with Sport England’s guidance “Artificial Grass Pitch Acoustics – Planning Implications – New Guidance for 2015”.

A Noise Impact Assessment is submitted in support of the planning application, to assess the baseline noise environment and the impact of the proposed AWGP on residential amenity and identify any mitigation measures required

The Noise Impact Assessment, which included a baseline noise survey, sets out that:

- Assessment modelling results indicate that without mitigation the external noise level at the nearest residential gardens is >50dB LAeq which is over the WHO health criteria.
- To meet the criteria of less than 50dB LAeq in the nearest gardens, a 3m high solid noise barrier is proposed for the AWGP and grass football pitch.



- To provide the necessary screening of noise the barrier must have a minimum surface mass of >10kg/m<sup>2</sup> and be imperforate throughout its height and length.
- To prevent impact noise from balls on the solid noise barriers, additional mesh fences are included around the sports pitches between the pitch and the solid barrier.
- Without the above mitigation, predicted noise levels from the AWGP at 1m above ground level in the nearest residential gardens would be between 50-55dB, which would exceed the Sport England guidance.
- Baseline noise levels acquired through receptors placed across the site were between 33 and 65 dB, and as such predicted noise generated from the AWGP would be comfortably within this existing range.

Overall, the Noise Impact Assessment demonstrates that with the addition of mitigation measures in the form of 3m high solid noise barriers and mesh fencing around the AWGP and grass football pitch, the noise impact from these sports pitches for properties on Snowdon Avenue can be maintained to below the Sport England guideline limit (50dB<sub>L</sub>A<sub>eq</sub>) in the nearest residential gardens. The development is therefore considered to align with **Policy EWP13** of the UDP and **Policy EN18** of the emerging LDP.

### 6.3.7 Biodiversity and Nature Conservation

The application site is not located within any statutory environmental designations. A Phase I Habitat Survey was carried out across the whole site on 22 May 2020 and this concluded that overall, the site was considered to be of low value to wildlife, as it was dominated by close mown amenity grassland/playing fields with relatively low floristic diversity. However, the site does have some relatively low potential for foraging bats, with the marginal hedgerows and trees potentially providing some bat foraging habitat.

Nocturnal emergence and dawn re-entry surveys to confirm the presence or absence of roosting bats were undertaken on 22 August 2020 and 6 September 2020, respectively. From the evidence of these surveys and the diurnal inspection, the status of bats at Argoed High School is considered to comprise low foraging activity of the Common Pipestrelle Bat in the wider area, with no roosting on site. The existing school buildings were not identified as bat roost or foraging habitat, and no further surveys or mitigation measures are proposed.

An Ecological Appraisal is submitted in support of the planning application to demonstrate that the impact of the proposed development at the site would be minimal with regards to biodiversity. The Ecological Appraisal confirms that from an ecological perspective, the proposed development is considered to have little impact on wildlife or habitats.

On-site ecological mitigation and enhancements recommendations within the Ecological Appraisal includes the following:

- Provision of meadow areas seeded with wildflowers

- Rain gardens/swale planting comprising a mix of meadow seeding and plug planting to provide botanical diversity;
- Shrub and herbaceous planting;
- An attenuation basin seeded with meadow species tolerant of wet and dry condition;
- Native species hedge planting;
- Amenity grassland;
- Playing field grassland; and
- New tree planting.

Each of these mitigations and enhancements are included within the final proposed design and are set out within the Landscape Illustrative Masterplan, enclosed with the planning application.

Furthermore, the change in ecological value of the site pre- and post-works has been calculated, and this confirms that the proposed development would minimise the biodiversity loss in terms of overall area, whilst the mitigation measures outlined above would increase the biodiversity value of the site over and above that currently existing. Development would therefore provide enhancements for biodiversity and nature conservation in accordance with **Policy 9** of Future Wales, **Policy STR7**, **Policy WB1**, **Policy WB5** and **Policy WB6** of the UDP and emerging **Policy STR13**.

### 6.3.8 Landscape and Trees

The application site is located within a gap between the settlements of Mynydd Isa, Buckley and Alltomi. Whilst this land is not formally allocated as a local or countryside gap, it is acknowledged that it is important to maintain the gap between the settlements and soften the site boundaries given its urban fringe location in accordance with **Policy L1** and **Policy EN4**. This would be achieved through the retention of existing boundary features, including hedgerows and mature trees at the northern and eastern boundaries and centre of the site; in addition to new planting throughout, including that proposed to separate and soften the parking bays at the north of the site.

Details of the proposed planting schedule is contained within the Planting Strategy, submitted with the planning application.

A Visual Impact Assessment has been prepared to appraise the development's visual impact and is enclosed with this application, it concludes that the proposed development would not be seen outside of any close-range viewpoints and would be seen in the context of the existing semi-rural urban fringe environment. Given the scale of development, and in conjunction with the topography, vegetation and the intervening built environment, the proposed development is not considered to have any significant impact on areas within the 1.5km study area used within the Visual Impact Assessment and therefore accords with **Policy D3**.

Section 5 of the Arboricultural Survey submitted with the planning application includes an arboricultural method statement that would be adhered to during construction. This method statement includes requirements such as protective barrier fencing, sensitive installation methods for proposed new hard surfaces and footbridge located within retained trees' root protection areas (RPAs); and arboricultural site monitoring.

All Category A trees are proposed for retention at the site, alongside existing hedgerows including along the existing brook. 131 no. additional trees would also be planted to replace those that would be lost around the existing buildings and near the north eastern boundary. Overall, the number of trees replaced would equal those lost through construction, at a minimum, in line with adopted **Policy TWH1, Policy TWH2** and **PPW11** and emerging **Policy EN7**.

The landscape enhancements that would be delivered as part of the proposed development are outlined in the Design and Access Statement and Landscape Masterplan. The impacts of the proposed development on landscape and trees are presented in the Arboricultural Impact Assessment submitted with the planning application.

### 6.3.9 Archaeology

Clwyd Powys Archaeological Trust were contacted prior to the pre-application submission to understand what level of archaeological assessment might be required in support of the planning application. The Archaeological Trust confirmed that:

- The site is of low archaeological potential based on the Historic Environment Record (HER);
- No recorded sites are within or immediately adjacent to the site boundary;
- No potential archaeological features are identified on the 1840 tithe, or old OS mapping between the 1st-4th editions;
- No sites are identified on the 1 metre NRW lidar, which shows generally featureless fields;
- The mature hedgerows across the site are all historic and in accordance with the Hedgerow Regulations Act 1997 they may be considered to be part of pre-enclosure (deemed to be 1850) field systems, therefore they constitute heritage features classed as 'important'; and
- As far as possible, efforts should therefore be made to retain the mature trees and hedgerows within the proposed development layout.

As discussed in section 4.2.6 above, all Category A trees are proposed for retention at the site alongside existing hedgerows including along the brook. In addition, all hedgerows would be retained at the site and as such, the impact of the proposed development on these heritage features is minimal. The proposed development is therefore considered to accord with **Policy HE7** and **Policy HE8**.

### 6.3.10 Flood Risk, Drainage and Hydrology

A Stage 1 Flood Consequence Assessment was conducted for the site in May 2020. This identified that the proposed development lies within an area categorised as Flood Zone A, an area with a low probability of conjunctural tidal/fluvial flooding. Therefore, based on the proposed development's end use as a school, the siting of development within Flood Zone A is appropriate and compliant with TAN15.

In line with **Policy EWP17**, SUDS are also included as part of the development proposals including bioretention features located within the main car park, around the building perimeter and within external areas adjacent to the building; attenuation of the car park and MUGAs by pervious paving; proposed drainage connection from the AWGP; and southern and eastern basins with stormwater connections. A SUDs Application to the SABs Authority has also been submitted alongside the planning application to ensure compliance with relevant legislation.

### 6.3.11 Ground Conditions and Contaminated Land

In relation to asbestos at the site, the Applicant commissioned a new management survey in February 2021. The report concluded that no high or medium risk elements were identified on the premises.

With regards to land contamination, a Phase I Geo-Environmental Desk Study Report and Phase II Geo-Environmental Assessment have been undertaken for the site, which concluded that the concentrations of potential contaminants recorded at the site are below the relevant General Assessment Criteria and mitigation measures would not be required and no ground gas protection measures are required, subject to Environmental Health Officer approval.

A Coal Mining Risk Assessment has also been undertaken at the application site, which confirms:

- There is some potential evidence of shallow mine workings across the site, in the form of shafts and possible workings at one location, but generally intact coal has been encountered; and
- Given the absence of recorded workings and lack of evidence in the 1975 ground investigation for workings it is considered unlikely that extensive unrecorded workings exist beneath the site. However, it is recommended that further investigation be undertaken in the area of the recorded "very soft drilling".

The Land Contamination Reports (Phase I and II Geo-Environmental Desk Study Reports) and Coal Mining Risk Assessment are submitted in support of the planning application. Overall, it is considered that in relation to ground conditions the proposed development fully accords with **Policy EWP14**, and as such should be supported.

### 6.3.12 Utilities and Waste

Deliveries and refuse collection at the proposed development would occur on-site to the north-east of the new building, where a dedicated turning area would be provided for deliveries, servicing and refuse collection. The Landscape Masterplan, enclosed with the planning application, details how the proposed development has been designed to mitigate the visual and aural impact of the site on the surrounding area.

Further details of waste management are provided in the Design and Access Statement and Transport Assessment, enclosed with the planning application. FCC confirmed on 2 February 2021 through email correspondence that there would not be a requirement to submit a Waste Arisings Assessment in support of the planning application.

The Utilities Plan submitted with the planning application demonstrates the service requirements for the school in line with **Policy CF6**.

## Conclusion

An application for full planning permission has been submitted to FCC for the proposed development of the Argoed High School and grounds to develop the new net zero Mynydd Isa Campus, to include an AWGP, 5no. MUGAs, play and amphitheatre spaces, a forest school / habitat / science garden, retention of three existing grass sports pitches, erection of a pedestrian footbridge, car and cycle parking infrastructure, SUDS, biodiversity and landscaping enhancements.

With reference to the planning assessment in Chapter 6, it is considered that the proposed development accords with the relevant policies of Future Wales and the adopted UDP as summarised in Table 2 below.

Moreover, it is considered that the proposed development accords with the relevant policies of **PPW11** and the emerging LDP which form material planning considerations.

For these reasons it is considered that the many positives of the development outweigh any harm and the application accords with the Development Plan as a whole and as such the Applicant respectfully requests that planning permission be granted accordingly. Table 1

Table 2: Proposed Development Policy Compliance

Policy	Proposed development response
<b>Principle of Development</b> STR1 New Development CF1 Retention of Existing Facilities CF2 Development of New Facilities PC1 The Relationship of Development to Settlement Boundaries PC12 Community Facilities	<p>The proposed development would significantly improve the quality of existing educational facilities at the Argoed High School and Mynydd Isa Primary School sites and meet future local educational requirements as part of a new co-located primary and secondary school.</p> <p>Although the proposed development is located outside the settlement boundary, none of the circumstances prescribed by <b>Policy GEN3</b> in relation to development in the open countryside apply to the proposed development. Policy CF2 and emerging <b>Policy PC1</b> (set out above) allows for the development of community facilities outside settlement boundaries where this involves the development of land with a previous built use (in this instance, for educational facilities).</p> <p>Given the site's existing use as a community facility/school, <b>Policy CF2</b> and <b>Policy PC1</b> of the UDP and <b>Policy PC12</b> of the emerging LDP are relevant to the proposed development and can therefore be used to establish the principle of development at the site, despite being located outside the settlement boundary.</p> <p>The proposals also align with <b>Policy CF1</b> through the provision of a new school and providing suitable alternative provision as part of the proposed development.</p>
<b>Sports and Recreation</b> SR4 Protecting Recreational Open Space STR11 Sport, Leisure and Recreation	<p>Whilst the proposed development would result in the loss of circa 7,997sqm of sports fields at the east of the site, these fields do not meet current recommended pitch requirements (as confirmed by Sport Wales in previous engagement). The proposals compensate this loss through the provision of new and enhanced sports facilities and still would provide circa 29,267sqm of playing fields plus 5no. 18.5 x 37m MUGAs and as such the</p>

Policy	Proposed development response
STR13 Natural and Built Environment, Green Networks and Infrastructure EN1 Sports, Recreation and Cultural Facilities PPW11	proposed development aligns with <b>Policy STR11, STR13, SR4</b> of the UDP and <b>Policy EN1</b> of the emerging LDP.
<b>Design</b> Policy 2 – Shaping Urban Growth and Regeneration – Strategic Placemaking D1 Design Quality, Location and Layout D2 Design D4 Outdoor Lighting D5 Crime Prevention D6 Public Art STR4 Principles of Sustainable Development, Design and Placemaking PC2 General Requirements for Development PC3 Design	The proposed development has been sensitively designed to respond to the context of the site. Specific design features including the site layout, location to reduce impact on residential amenity, reduce risk and fear of crime, create a sense of place and enhance environmental sustainability and energy efficiency through building orientation and zero carbon measures. Overall, it is therefore considered that the proposals align with policy requirements prescribed by <b>Policy 2</b> of Future Wales; and <b>Policy D1, D2, D4 – D6</b> of the UDP, alongside <b>Policy PC2</b> and <b>PC3</b> of the emerging LDP.
<b>Sustainability and Climate Change</b> EWP2 Energy Efficiency in New Development EWP3 Renewable Energy in New Development STR14 Climate Change and Environmental Protection PC4 Sustainability and Resilience of New Development EN12 New Development and Renewable and Low Carbon Energy Technology	The proposed development incorporates a net zero carbon design and aims to achieve a BREEAM ‘Excellent’ rating. The proposed development would be Net Zero Carbon in operation through use of PV arrays and full offsetting of remaining carbon. Overall, the design has given significant consideration of key sustainability issues such as: the siting, density and orientation of buildings; microclimate improvements; the re-use of materials in construction; low energy construction methods; high standards of insulation; and opportunities for passive solar heating. As such the proposed development is considered to align with <b>Policy EWP2</b> and <b>EWP3</b> .
<b>Transport and Access</b> Policy 12 – Regional Connectivity STR2 Transport and Communication AC2 Pedestrian Provision and Public Rights of Way AC3 Cycling Provision AC4 Travel Plans for Major Traffic Generating Developments AC13 Access and Traffic Impact AC14 Traffic Calming AC18 Parking Provision and New Development	As evidenced in the Travel Plan, the proposed development would not result in significant trip generation as it would involve the merging of two existing schools already on the network. As such the proposed development accords with <b>Policy AC4</b> of the UDP. Pedestrian and cycle access would continue to be gained off Bryn Road via two dedicated shared paths to the entrance of the school and the existing shared path off Snowdon Avenue to the south-east of the site. Cycling parking provision on-site would meet projected future demand. Active travel provision is therefore incorporated within the proposed design, in alignment with <b>Policy 12</b> of Future Wales and compliant with local UDP <b>Policy AC2, AC3</b> and <b>PC6</b> . The proposed car and cycle parking would meet anticipated transport and movement requirements of the development through



Policy	Proposed development response
AC1 Facilities for the Disabled PC5 Transport and Accessibility PC6 Active Travel PC7 Passenger Transport	use of drop off and long-term car parking spaces and accord with adopted and emerging local policy, including for EV charging spaces and disabled persons parking in line with <b>Policy AC18</b> ; <b>AC3 and AC1</b> of the UDP, <b>Policy PC5</b> of the emerging LDP and <b>Policy 12</b> of Future Wales.
<b>Residential Amenity</b> GEN1 General Requirements for Development PC2 General Requirements for Development	<p>Impacts for residential amenity have been considered throughout the proposed design development, namely, siting, scale and massing of the campus building, and landscaping proposals that would provide natural screening.</p> <p>To mitigate any impacts on amenity for residents adjacent to the site, the AWGP is proposed to be set down into the site and circa 45m from residential properties fronting onto Snowdon Avenue, and this is considered a reasonable separation distance.</p> <p>Given the size of the site and the site's topography which falls west to east and north to south, impacts of overlooking, overshadowing and overbearing from the school buildings are considered minimal. It is therefore considered that the proposed development would accord with <b>Policy GEN1</b> of the UDP and <b>Policy PC2</b> of the emerging LDP.</p>
<b>Lighting</b> D4 Outdoor Lighting EN18 Pollution and Nuisance	<p>Lighting across the site would sympathetic to the surrounding area to prevent impacts on residential amenity, whilst fulfilling the requirements for the pitches and security.</p> <p>The AWGP and MUGAs would include floodlighting that is below the specified maximum limits for Environmental Zone E3 'Suburban' of which permits medium district brightness as a lighting environment. The proposed design would achieve a compliant upward light ratio (ULR) appropriate for this zone (2.5%, compared to the maximum value of 5%).</p> <p>Overall, it is considered that the proposed development accords with <b>Policy D4</b> of the UDP and <b>Policy EN18</b> of the emerging LDP.</p>
<b>Noise</b> EWP13 Nuisance EN18 Pollution and Nuisance	<p>The Noise Impact Assessment submitted in support of the application has assessed the impact of the proposed floodlit AWGP at the nearest noise sensitive receptor along Snowdon Avenue and the cumulative impact of the floodlit artificial pitch and community sports pitches being played on at the same time. The assessment has found that there would be no additional adverse impacts on existing surrounding dwellings and future dwellings by reason of noise, and as such the proposals are in accordance with <b>Policy EWP13</b>.</p> <p>Mitigation is proposed in the form of acoustic fencing of the AWGP which would ensure that the noise levels for surrounding residential development to the west would not exceed WHO regulations, as demonstrated by the Noise Impact Assessment. Mitigation measures would mean that the proposed development is in alignment with <b>Policy EWP13</b> and <b>EN18</b>.</p>
<b>Biodiversity and Nature Conservation</b> Policy 9 - Resilient Ecological Networks and Green Infrastructure STR7 Natural Environment	<p>The proposed development would not impact any designated sites or species, as demonstrated through the Ecological Appraisal and therefore would align with <b>Policy WB1</b> of the UDP.</p> <p>Mitigation measures including meadow areas, rain gardens/swale planting, attenuation basins and new tree planting, as recommended by the Ecological Appraisal, have been fully incorporated within the final proposed design.</p>

Policy	Proposed development response
GEN5 Environmental Assessment WB1 Species Protection WB5 Undesignated Wildlife Habitats WB6 Enhancement of Nature Conservation Interests STR13 Natural and Built Environment, Green Networks and Infrastructure	Through sensitive landscaping proposals that consider the existing features of biodiversity and inclusion of new habitat areas, the proposed development would enhance the biodiversity of the site, and as such, the proposals are considered to accord with <b>Policy 9</b> of Future Wales and <b>Policy STR7</b> and <b>WB6</b> of the UDP.
<b>Landscaping and Trees</b> L1 Landscape Character D3 Landscaping TWH1 Development Affecting Trees and Woodlands TWH2 Protection of Hedgerows EN4 Landscape Character EN7 Development Affecting Trees, Woodlands and Hedgerows	The VIA carried out for the proposed development has concluded there would be no significant adverse visual impacts arising from the proposed development and would therefore be compliant with <b>Policy L1</b> of the UDP and emerging <b>Policy EN4</b> .  Landscaping proposals for the site would involve no net loss of trees and no removal of Category A trees (therefore is compliant with <b>Policy TWH1</b> , <b>TWH2</b> and emerging <b>Policy EN7</b> ) and are sensitively designed in order to respect local landscape character, considering the site topography and flora species present. The proposed design would enhance the character of the landscape in alignment with <b>Policy L1</b> of the UDP.
<b>Archaeology</b> HE7 Other Sites of Lesser Archaeological Significance HE8 Recording of Historic permitted Features	The proposed development would cause no significant adverse impact on cultural heritage and archaeology in accordance with <b>Policy HE1 – HE8</b> of the UDP.  As discussed in section 6.2.9 above, all Category A trees are proposed for retention at the site alongside existing hedgerows including along the brook. This is positive from a historic landscape point of view as the hedgerows were identified as having an important heritage value by Clwyd Powys Archaeological Trust.
<b>Flood Risk, Drainage and Hydrology</b> EWP17 Flood Risk EN14 Flood Risk EN15 Water Resources	The application site does not fall within a high flood risk zone and as such is policy compliant. In line with <b>Policy EWP17</b> , SUDS are included as part of the development proposals to manage surface water runoff at the site, including for the AWGP. A SUDS Application to the SABs Authority has also been submitted alongside the planning application.
<b>Ground Conditions and Contaminated Land</b> EWP14 Derelict or Contaminated Land	The proposed development would result in no additional impacts in terms of ground conditions, as evidences in the Geo-environmental studies undertaken. Mitigation measures would be adhered to throughout construction to minimise risk.
<b>Utilities and Waste</b> CF6 Service Provision EWP16 Water Resources EWP10 Reusing Development Waste AC24 Cable Installation EWP9 New Development and Waste Management Facilities STR15 Waste Management PC4 Sustainability and Resilience of New Development	The proposed development would meet all the relevant essential service requirements (water, gas, electricity and drainage) without detriment to the natural and built environment, or the amenity of other land users and as such, would be fully policy compliant.

Policy	Proposed development response
EN19 Managing Waste Sustainably	

## Appendix I: EIA Screening Opinion

Your ref EIA Screening  
Our ref 280340-00  
File ref 4-50

# ARUP

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3 March 2021

Dear James,

**EIA Screening Request under Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017  
Full Planning Application for the redevelopment of the Argoed High School site to form the Mynydd Isa Campus**

Ove Arup and Partners Limited (Arup) has been instructed by WEPCo Limited and Flintshire County Council Education Department (FCC) to request your opinion on the requirement for an Environmental Impact Assessment (EIA) for the redevelopment of the Argoed High School site, located to the south of Bryn Road, Mynydd Isa, Flintshire, CH7 6RY.

This request is made under Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (the EIA Regulations) and provides the relevant information for the authority to adopt a screening opinion in line with Regulation 6(2) of the EIA Regulations.

### **Application Site**

The application site is currently occupied by Argoed High School, located to the south of Bryn Road, Mynydd Isa. The site area equates to approximately 8.8ha.

The site is bound to the north by Bryn Road and residential development off Snowdon Avenue, Pen-Y-Garreg Close and Berwyn Close to the west. Open countryside exists to the east of the site and public open space in use as the Argoed Sports and Social Club to the south of the site. The A549 is located approximately 1km to the south of the site.

A location plan sufficient to identify the land is enclosed in Appendix A.

The current land use is the Argoed High School and its grounds, including a main school building, sports hall building, two temporary buildings comprising four classrooms, hard standing, road access/egresses and ancillary playing fields and sports pitches. The existing high school was constructed in 1978.

Vehicular access to the site is gained off Bryn Road to the north. Pedestrian access to the site is currently from Bryn Road adjacent to the vehicle access and also from a footpath which connects the site to the south-east along the back of properties on Snowdon Avenue.

The nearest bus stop to the site is located on the highway off Bryn Road, situated approximately 210m to the west of the site. This is served by the Number 4 bus route that runs between Mold and Chester on a 30-minute frequency.

Buckley Railway Station is located approximately 5km to the east of the site and can be accessed via Bryn Road or Mold Road (A549) to the south of the site. The station is served by an hourly service (Monday – Saturday), with southbound services to Wrexham Central and northbound to Bidston. Connections to Shrewsbury, Cardiff and Birmingham are available at Wrexham Central, whilst connections to Birkenhead and Liverpool Stations are available from Bidston via the Wirral Line.

### **Proposed Development**

The proposed development would provide a new primary and a new high school in a co-located building at the Argoed High School site through the relocation of Ysgol Mynydd Isa primary school and to be known collectively as the Mynydd Isa Campus. The high school and primary school would remain as separate schools but operate within a single building with some shared facilities.

A proposed site layout for the development is enclosed in Appendix B.

The new primary school would accommodate 600 places with a 43-place nursery and a 20-place primary speech and language specially resourced provision facility. The high school would accommodate 700 places with a 10-place secondary speech and language specially resourced provision facility and a 20 place Asperger's specially resourced provision facility.

By increasing current levels of capacity, the proposed development would meet and exceed forecast requirements for September 2023 in line with the planned Local Development Plan housing provision. FCC aspire for the proposed campus building to be operational by this date.

### **Development Proposals**

The planning application would seek full planning permission for the demolition of the existing Argoed High School buildings and the provision of a new school campus, with associated works including landscaping; SUDs; hardstanding and pedestrian walkways; provision of a 140no. space car park and servicing area; 1no. large floodlit all weather sports pitch and 5no. Multi Use Games Areas (MUGAs) in addition to the retention of three existing grass sports pitches at the south of the site.

The new school buildings would be located to the west of the existing buildings and would be two storeys in height and comprise a gross internal floor area of approximately 10,300sqm, within an overall site area of 8.8ha. The building would be fronted by admin facilities, the primary school and nursery would be located in the northern wing of the school building and the high school would be located in the southern wing, separated by the Speech and Language Specially Resourced Provision facility.

The school sports provision would be located to the west, east and south of the school buildings and would comprise a mixture of hardstanding MUGAs, a floodlit all-weather sports pitch, grass sports pitches and a sports hall. Some of which would be available to the community outside of school hours.

The site would also be zoned with dedicated outdoor areas for the nursery, primary and secondary schools plus the all weather sports pitch and grass sports pitches which would be shared facilities.

Vehicular access would continue to be gained off Bryn Road with the existing pick-up/drop-off provision retained and the campus would be served by a 140no. space car park. Pedestrian and cycle access would also continue to be gained off Bryn Road via two dedicated shared paths to the entrance of the school and another shared path off Snowdon Road to the south-east. A service and delivery yard plus bin store would also be located to the north-west of the main school buildings.

The delivery of the campus would be phased with Argoed High School continuing to operate from the site during the construction of the new building, with the existing building subsequently demolished.

The site is located outside the defined settlement boundary of Mynydd Isa where development in the open countryside is resisted in accordance with **Policy GEN3** of the adopted Unitary Development Plan (UDP). However, the proposed development would be the extension of an existing community facility and **Policy CF3** allows for the development of new community facilities, including schools, outside settlement boundaries where they are an extension to an existing facility or land with a previous built use. Part of the application site is currently used for playing fields and the UDP seeks the retention of playing fields through **Policy STR11** and **Policy SR4**. Whilst the proposed development would result in the loss of some sports pitches at the site, the proposals would look to compensate this loss through the provision of new and enhanced sports facilities.

### **Environmental Baseline**

The site is not located within any statutory environmental designations and does not contain any listed buildings or scheduled monuments.

Within the wider surroundings the following features are considered of relevance:

- The Buckley Claypits and Commons Site of Special Scientific Interest (SSSI) is located approximately 770m to the east from the centre of the application site and the Maes-Y-Grug SSSI is located approximately 1.5km to the north of the centre of the application site.
- The Deeside and Buckley Newt Special Areas of Conservation are located approximately 770m to the east and 1.5km to the north of the centre of the application site respectively.
- The Coed Argoed Local Wildlife Site and the Bryn y Baal Quarry Regionally Important Geological Site are both within 1km of the site.

A number of technical site surveys for a range of topics have been undertaken for the site to date. The findings of this survey work are summarised for information below.

#### *Ecology*

A Phase I Habitat Survey was carried out across the whole site on 22 May 2020. Overall, the site was considered to be of low value to wildlife, as it was dominated by close mown amenity grassland/playing fields with relatively low floristic diversity and no European Protected Species were identified on site.

Site evaluation conclusions and recommendations were as follows:

- Within 1km of the site, there were a number of European Protected Species records, including bats, badgers, hedgehog, brown hare and polecat. However, these were located beyond barriers such as roads and residential development. Amphibian and reptile records were identified from beyond 500m of the site;



- None of the trees contained features that provided potential for bat roosting and/or hibernation. An external inspection of the buildings revealed that one of the buildings had medium suitability for roosting and/or hibernating bats;
- The site has relatively low value to foraging bats, as the site is largely open, although marginal hedgerows and trees provide better bat foraging habitat;
- Scattered trees and hedgerows within the site have potential to support nesting and foraging birds;
- Due to the absence of still water or other wetland features on the site, it has negligible potential for amphibians;
- The site offered poor habitat for reptiles due to the frequent mowing regime and lack of suitable cover;
- There were no signs of badger activity and no suitable habitat for otters or water voles, whilst there was negligible potential for significant invertebrate assemblages, in particular those species listed as a priority in the UK Biodiversity Action Plan and/or Local Biodiversity Action Plan; and
- No rare vascular plants were identified, and all species recorded were common and widespread.

In addition to the above, nocturnal emergence and dawn re-entry surveys to confirm the presence or absence of roosting bats were undertaken on 22 August 2020 and 6 September 2020, respectively.

During the first survey, two Common Pipistrelle Bat *Pipistrellus pipistrellus* were detected foraging along a perimeter hedgerow in the distance, having emerged from elsewhere. On the dawn re-entry survey no bats were detected anywhere around the buildings or the wider site.

From the evidence of these surveys and the diurnal inspection, the status of bats at Argoed High School is considered to comprise low foraging activity of the Common Pipistrelle Bat in the wider area, with no roosting on site. The existing school buildings were not identified as bat roost or foraging habitat, and no further surveys or mitigation measures are required.

#### *Flood Risk*

A Stage 1 Flood Consequence Assessment (FCA) was conducted for the site in May 2020.

This identified that the proposed development lies within an area categorised as Flood Zone A, an area with a low probability of conjectural tidal/fluvial flooding. In addition, sewer flooding is unlikely to present a significant risk to the proposed development. However, the site contains areas that are potentially at a high risk of surface water flooding; and surface water runoff will require attenuation if discharged to the existing watercourse.

Based upon the proposed development end use as a school which is classified as a 'Highly Vulnerable' use, the siting of development within Flood Zone A is appropriate and compliant with TAN15.

Further site investigation works will be undertaken in order to fully assess the potential for the underlying soils to support infiltration drainage systems and the potential for groundwater to impact upon the site.

### *Noise*

Due to Covid-19 restrictions in place at the time of commission, a desktop noise impact assessment was conducted in June 2020 for the site based on available transportation data for the surrounding area.

Using the predicted noise levels and modelling, it is identified that teaching space within the proposed development can be naturally ventilated for all facades. On this basis, noise should not be a limiting factor for the proposed development. However, a Noise Impact Assessment will be submitted in support of the planning application.

### *Contamination and Coal Mining Risk*

A Phase I Geo-Environmental Desk Study Report was prepared for the site in June 2020. Site evaluation conclusions and recommendations were as follows:

- Superficial Till deposits are recorded across the site on relevant BGS mapping, underlain by bedrock geology of the Pennine Lower Coal Measures Formation.
- Made Ground is not indicated within the site boundary on the published geological mapping, however, limited localised made ground should be anticipated associated with the existing school.
- The Preliminary Conceptual Site Model indicates a low possibility that harm could arise to a designated receptor from identified hazards.
- The site does lie within a Coal Authority standing advice or reporting area;
- There are three mine shafts within the site boundary, and therefore, a Coal Mining Risk Assessment may be required to support a planning application if there is interaction between the proposed layout and the known shafts; and
- The site in general is not within a 'High Risk Development Area'.

A Phase II Geo-Environmental Assessment has also been undertaken for the site in September 2020 which summarises the ground investigation undertaken, the report concludes:

- Assuming no significant level changes, the natural deposits are considered to be a suitable formation layer where they are encountered in a firm condition.
- It is considered that the natural fine soils at shallow depth may be suitable for use as engineered fill without modification. However, it should be noted that some moisture contents derived from the geotechnical testing are outside the range of OMCs and therefore modification of some material may be required. Further materials testing and an earthworks appraisal is recommended for design.
- The concentrations of potential contaminants recorded at the site are below the relevant GACs and mitigation measures will not be required.
- Ground gas concentrations have been monitored on four occasions in order to obtain an indication of the ground gas regime at the site. Comparison of the steady state gas screening value with Table 2 of BS8485:2015 + A1:2019 indicates the site falls in a Characteristic Situation 1 and therefore no ground gas protection measures are required, subject to Environmental Health Officer approval.

A Coal Mining Risk Assessment has also been undertaken at the site which confirms:

- There is some potential evidence of shallow mine workings across the site, in the form of shafts and possible workings at one location, but generally intact coal has been encountered.
- Given the absence of recorded workings and lack of evidence in the 1975 ground investigation for workings it is considered unlikely that extensive unrecorded workings exist beneath the site. However, it is recommended that further investigation be undertaken in the area of the recorded “very soft drilling”.
- We recommend an additional cored borehole adjacent to the hole that encountered ‘suspected workings’. If voids are confirmed at this location, as a risk mitigation measure, it may be appropriate to consider the use of a reinforced concrete raft foundation (designed to span/cantilever over say a 3m void). If there are no voids encountered at this location, given that no other evidence of shallow mine workings has been recorded standard shallow strip and pad foundations should be feasible.

The Land Contamination Reports and Coal Mining Risk Assessment will be submitted in support of the future planning application.

### *Transport*

High level discussions have been held by Flintshire County Council (FCC) with Planning and Highways and they have not raised specific concerns about the redevelopment of the site at this stage. However, a Transport Assessment will be prepared.

A Transport Feasibility Survey was undertaken in October 2020 for the site.

This concluded that the proposed development would be designed to not generate any parking demand on the local road network, with the development proposals including an on-site car park with pupil pick up and drop off facilities. The extent of the pupil pick-up and drop off facility to be provided on-site will be discussed with FCC Highways team during the pre-application process.

The high-level site evaluation conclusions and recommendations arising from the survey were as follows:

- Given the existing presence of Argoed High School on-site (which is understood to have a capacity of 700 pupils), it is to be noted that the only additional vehicle movements generated by the development will be associated with the pupil and staff trips of the proposed primary school; and
- There are no on or off-road cycle routes on the local road network. However, Bryn Road is relatively low trafficked and is sufficiently wide which is conducive to cycle movements for both staff and pupils (secondary school).

A Transport Assessment and School Travel Plan will be submitted in support of a future planning application.

### **EIA Requirements**

The Regulations set out the legislative framework for establishing the need for an EIA to be undertaken and submitted in the form of an Environmental Statement (ES) with a planning application. Regulation 6 sets out the process for identifying whether an EIA is required.

### *Schedule 1 Assessment*

Under the EIA Regulations, the proposed development does not constitute Schedule 1 development.

### *Schedule 2 Assessment*

To be classified as a Schedule 2 development a proposal must be of a kind described in Schedule 2 of the EIA Regulations and either, located within a ‘sensitive area’, or any applicable threshold or criterion must be exceeded or met.

The proposed site is not located within an environmentally sensitive location, i.e. it is not within an area defined as a ‘sensitive area’ in Regulation 2(1) of the EIA Regulations.

The proposed development does fall into Schedule 2 category 10 (b) ‘urban development projects’ of the EIA Regulations as it includes more than 1 hectare of urban development which is not residential development and the overall area of the development exceeds 5ha, as such it must be screened against Schedule 3 of the EIA Regulations, as described in further detail below.

### **Schedule 3 Screening**

Schedule 3 of the EIA Regulations stipulates the selection criteria for screening Schedule 2 development, in relation to the characteristics of development, location of development and types and characteristics of potential impact.

### *Characteristics of Development*

The characteristics of development, including level of environmental sensitivity, which must be considered for the site are as set out within **Table 1** below, and discussed in the following sub-sections.

**Table 1** Schedule 3 selection criteria for screening Schedule 2 development

<b>Development Characteristic</b>	<b>Potential for likely significant effects</b>	<b>Type and characteristic of effects</b>	<b>Scale, duration and probability of effects</b>
(a) the size and design of the development;	No	The application site area equates to approximately 8.8ha. While the site is large in area, it constitutes brownfield land located adjacent to an existing settlement. The scale and design of the development would be in keeping with the existing site use, surroundings and would be suitably screened using soft landscaping.	N/A
(b) the cumulation with other existing development and/or approved development;	No	A review of FCC’s planning applications register revealed that there are a number of major applications (recently permitted or pending consideration) that may have some impacts for traffic and transport in the locality. However, the full cumulative impacts would also be assessed through the Transport Assessment submitted in support of the future planning application.	N/A

(c) the use of natural resources, in particular land, soil, water and biodiversity;	No	The application site comprises brownfield land and the proposed development would not place disproportionate pressure on the use of natural resources, including water supply. The proposed development would maximise the use of previously developed land, while avoiding significant environmental effects.	N/A
(d) the production of waste;	No	Given the nature of the proposed development (i.e. an education facility), it is not considered that there would be major environmental effects related to waste production or management. Appropriate waste facilities would be provided at the site and details provided as part of the future planning application.	N/A
(e) pollution and nuisances;	No	While it is acknowledged that there is potential for some noise and light pollution associated with the proposed development's all weather sports pitch and emissions associated with increased trip generation, it is considered that this would not reach a level deemed to be classified as a significant environmental effect. This is on the basis that the proposed development seeks to expand and merge existing educational facilities and the site is already served by external sports facilities.  A Noise Assessment and Transport Assessment would inform the future planning application, where design of the proposed development would seek to mitigate any potential effects of noise or emissions pollution.	N/A
(f) the risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge;	No	The proposed development is not considered to create undue risk of major accidents and/or disasters. The proposals are for education facilities on a brownfield site.	N/A
(g) the risks to human health (for example due to water contamination or air pollution).	No	Risks to human health are considered to be predominantly limited to those associated with highways safety and access, pollution and potential for crime including terrorism. All risks would be well-managed through design. This would be set out within the Design and Access Statement, Travel Plan and supporting Environmental Reports submitted with the future planning application.	N/A

Whilst the site is large in area, the characteristics of the proposed development as specified by Schedule 3 subsection 1 clauses (a) to (g) do not signal that the development would necessitate an EIA. Conclusions against each development characteristic are set out in **Table 1** above.

To assess the inter-project cumulative effects in accordance with subsection 1 clause (b), a review of planning applications for major developments near the site was carried out.

A number of relevant major developments were identified (referred to as ‘cumulative schemes’), and the location of each is shown in **Table 2** below. In identifying the cumulative schemes, consideration was given to their distance from the proposed development, the scale of the development and project timescales.

All major developments are located between 0.7-1.4km from the application site, with only one located within Mynydd Isa. As the scale of developments identified are less than or equal to 150 dwellings (non-EIA development), it is considered that there would be no significant cumulative effects associated with the proposed development and other major planning applications in the locality.

**Table 2** Major planning applications within the site surrounds

<b>Development and Location</b>	<b>Application Status (as of February 2021)</b>	<b>Decision Date</b>	<b>Planning Application Ref.</b>	<b>Distance from site (km)</b>	<b>Project timescale</b>
Erection of 59no. dwellings and associated works  <b>Land at Issa Farm Bryn Road, Mold, CH7 6RY</b>	Approved after completing Legal Agreement	24 Apr 2019	059026	0.8	Under construction
Residential development for the erection of 92 dwellings including the provision of affordable units, areas of public open space, landscaping and associated works  <b>Land to the south of New Brighton Road, New Brighton Road, Mold (365551, 325184)</b>	Refused – Appeal pending	30 Oct 2020	060220	1.4	Appeal pending
Development of 56 dwellings on land to rear of 66A Mold Road, including new roadway, parking areas, landscaping and drainage connections including formation of swale.  <b>66A Mold Road, Myndd Isa, Mold, CH7 6TD</b>	Decision pending	TBC	061572	0.8	Decision pending
Screening Opinion Request for proposed residential development of up to 150 dwellings, means of access, open space, sustainable drainage infrastructure and all other associated works (outline application)	Decision issued – Non-EIA- Development not requiring ES	2 Dec 2020	061706	0.7	Screening Opinion Issued

including access with all other matters reserved)					
<b>Land adjacent to Well Street, Buckley, CH7 2PQ</b>					

***Location of Development***

The application site is located on brownfield land on the edge of the Mynydd Isa settlement boundary. Whilst the site is located within the countryside, its previously developed land status means that the siting of the proposed development would not cause significant issues related to impacts on openness of the countryside.

As set out above in the environmental baseline section, the site is not located within any statutory environmental designations and does not contain any listed buildings or scheduled monuments. The summary of survey reporting including for ecology, flood risk, noise, contaminated land and transport indicates that overall, the site is not considered to be located in an environmentally sensitive location.

No statutory designations (ecological, landscape or historical) are located at the site and as such, the application site is not considered to be environmentally sensitive under the EIA Regulations. The site is also not within any areas of significance (either nationally or locally) that would signal that the site’s natural environment is at absorption capacity, and therefore the location of development is not considered to warrant the proposals EIA development.

***Types and Characteristics of the Potential Impact***

Whilst it is understood that the proposed development may lead to environmental impacts through the site preparation and construction phases, it is anticipated that these will be minor and of a temporary nature (for the duration of the construction works).

Potential effects are identified as being associated with:

- Visual and pollution impacts through the construction phase;
- Potential disturbance to habitat and ecological receptors on and/or off-site;
- Potential increase in surface water run-off; and
- Construction traffic on local roads.

Mitigation for likely impacts during construction would be agreed with the local planning authority prior to the commencement of works and appropriate conditions could be applied to any future planning permission to mitigate these impacts.

Longer-term potential environmental impacts, associated within the operation of the proposed development are not considered to be complex and are identified as being associated with:

- Creation of habitat and amenity space;
- Provision of a new educational facility to meet community needs;
- Creation of employment opportunities;
- Increase in municipal waste generation;
- Increase in noise and light pollution arising from floodlights and use of the proposed sports pitches; and



- Increased pressure on the local highway network and public transport.

As with the construction phase, the scheme will seek to include embedded mitigation which would limit the potential effects and/or ensure that positive effects are felt locally.

It is considered that the proposed development is compatible with the existing uses at the site and in the surrounding area and is unlikely to give rise to potentially significant adverse environmental impacts which would warrant EIA development.

### **EIA Screening Request**

This request for a Screening Opinion is made in accordance with Regulation 6 of the EIA Regulations. The applicant is of the opinion that due to the existing use of the site, nature of the development and location of the development proposals, the development is not EIA development requiring an Environmental Statement, as the site is not within a sensitive environment and temporary and permanent effects could be mitigated through design and construction practices. The proposals are therefore not anticipated to result in significant environmental effects.

Should FCC agree that the proposal is not EIA development, a number of environmental studies will nonetheless be carried out and submitted in support of the future planning application to ensure that social and environmental issues are included and assessed as part of the application process.

Below is the list of supporting documents that would be submitted with the future planning application. This list has already been shared and agreed in principle with the Case Officer:

- Application Forms and Certificates;
- Application Plan;
- Site Location Plan;
- Full Set of Plans (incl. layout plans, general arrangement plans, floor plans, elevations, sections, boundary plans, landscape plans, access plans, service/utility plans, drainage plans, level plans and materials plans);
- Arboricultural Impact Assessment;
- Archaeological Desk Based Assessment;
- Coal Mining Risk Assessment;
- Design and Access Statement;
- Drainage Statement;
- Ecological Appraisal;
- Energy Assessment;
- Flood Consequences Assessment;
- Flood Lighting Assessment;
- Landscape and Visual Assessment;
- Noise Impact Assessment;
- Phase I Geo-Environmental Desk Study Report;
- Phase II Geo-Environmental Assessment Report;
- Pre-application Consultation Report;

- Planning Statement;
- Transport Assessment; and
- Travel Plan.

I would be grateful if the FCC could provide a Screening Opinion within three weeks of receipt of this request in accordance with Regulation 6 of the EIA Regulations.

If you would like any further information, please do not hesitate to contact me.

Yours sincerely



Natalie Queffurus, MRTPI  
Senior Planner

Enc      Site Location Plan (FL0101 SRA ZZ ZZ DR A 02000)  
            Proposed Site Plan (FL0101SRA ZZ ZZ DR A 02001)

## **APPENDIX A – Site Location Plan**

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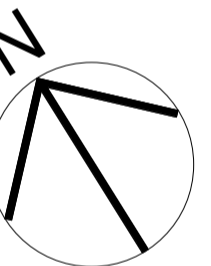
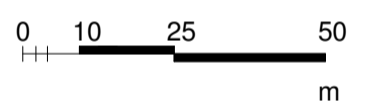
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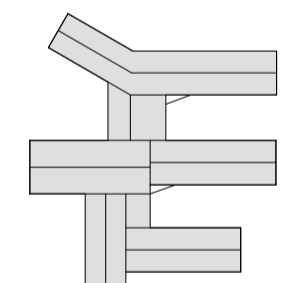
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- Site application boundary
- - - - Demolition (existing buildings)
- - - - Demolition (landscape)

REV.	DATE	AMENDMENT
P01	09/03/21	Issued for WEPCo Stage 1/ RIBA Stage 2



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PROJECT  
**Mynydd Isa Campus**

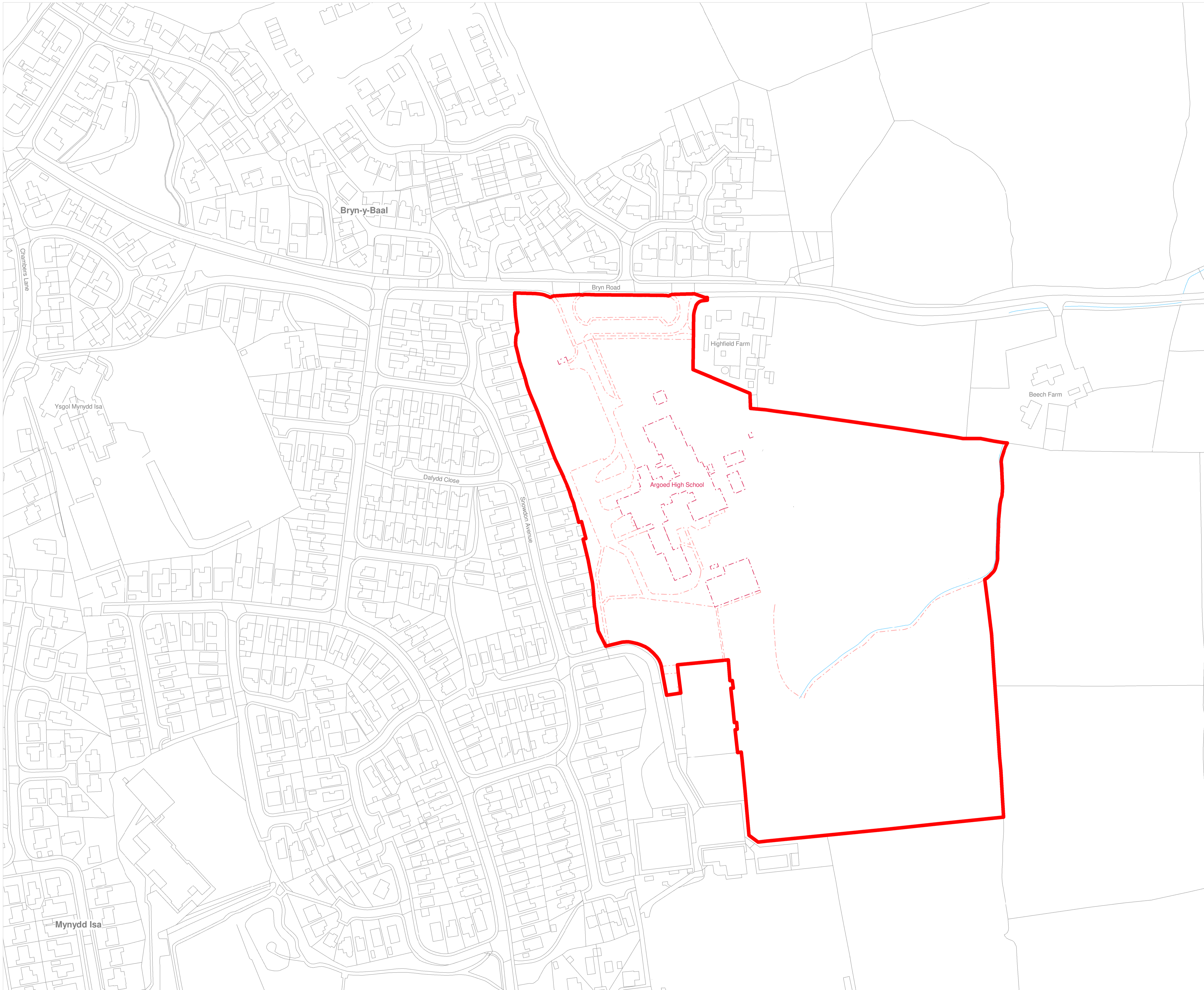
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**Location Plan**

**WEPCo Stage 1/ RIBA Stage 2**

STATUS	PURPOSE FOR ISSUE	SR NO.
<b>S4</b>	<b>Stage Approval</b>	<b>6636</b>

DRAWING NO.	REV.
<b>FL0101 · SRA · ZZ · ZZ · DR · A · 02000</b>	<b>P01</b>



# APPENDIX B – Proposed Site Layout

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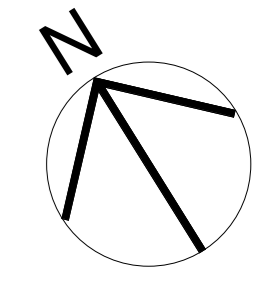
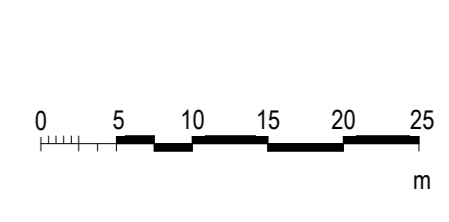
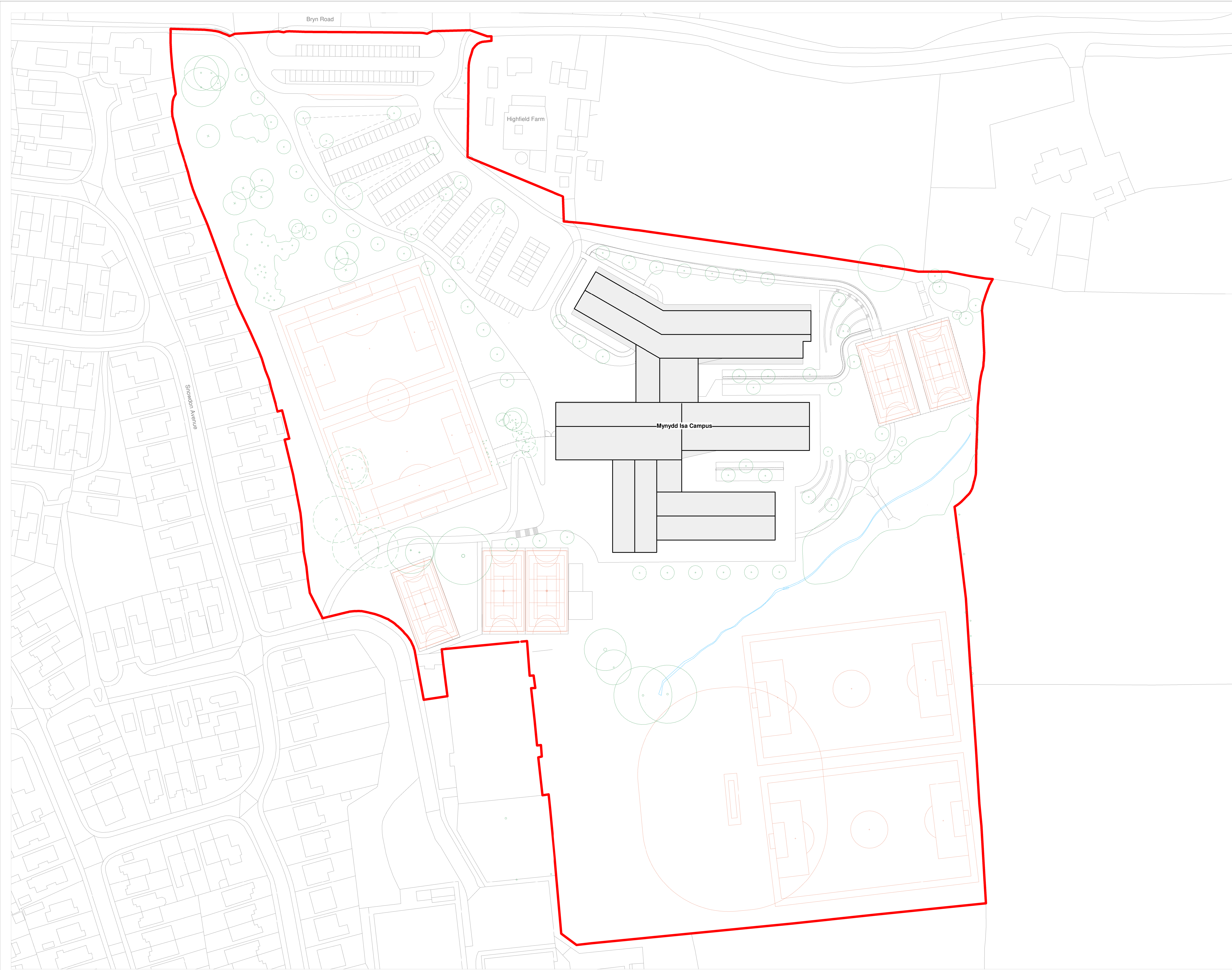
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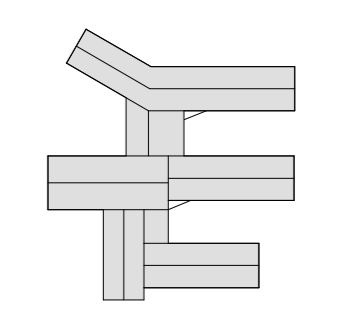
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— Site application boundary  
- - - Demolition (existing buildings)

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PROJECT  
**Mynydd Isa Campus**  
SCALE/DWG DATE ORIGINATOR CHECKED AUTHORISED  
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**Proposed Site Plan**

**WEPCo Stage 1/ RIBA Stage 2**  
STATUS PURPOSE FOR ISSUE SRF NO.  
**Planning** **6636**

DRAWING NO. REV.  
**FL0101 - SRA-ZZ-ZZ-DR-A-02001 P01**