TOWN AND COUNTRY
PLANNING ACT 1990

PLANNING AND COMPULSORY
PURCHASE ACT 2004

PLANNING ACT 2008

PLANNING APPLICATION ON BEHALF OF:

MARIN GARABAGIU

FIRST FLOOR

3 KING STREET

WREXHAM

LL11 1HE

CONVERSION OF FIRST FLOOR ABOVE A HOT FOOD TAKEAWAY INTO A SMALL HMO

SUPPORTING PLANNING STATEMENT

(incorporating Design & Access Statement)

PLANNING ANGEL
PLANNING AND DEVELOPMENT CONSULTANCY
GUARDIAN TO YOUR PROJECT

Reference: PAL/5039 **September 2024**

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1 INTRODUCTION

1.1 PREAMBLE

1.1.1 Planning Angel Ltd (PAL) have been commissioned by Marin Garabagiu to prepare a supporting Planning Statement for the conversion of the upper floor of a hot food takeaway Class A3 (Food and drink) to Class C4 (small HMO) at 3 King Street, Wrexham, LL11 1HE.

1.1.2 This statement has been produced to explain the rationale of the proposal and to set out the main planning considerations.

1.1.3 This Statement demonstrates how the design and planning objectives respond to the advice contained within the Planning Policy Wales (PPW), the relevant policies of the adopted Wrexham Local Development Plan 2013 to 2028 (adopted 20th December 2023) and Planning Guidance Note 5: Houses in Multiple Occupation, adopted on 8 May 2018.

2 SITE CONTEXT

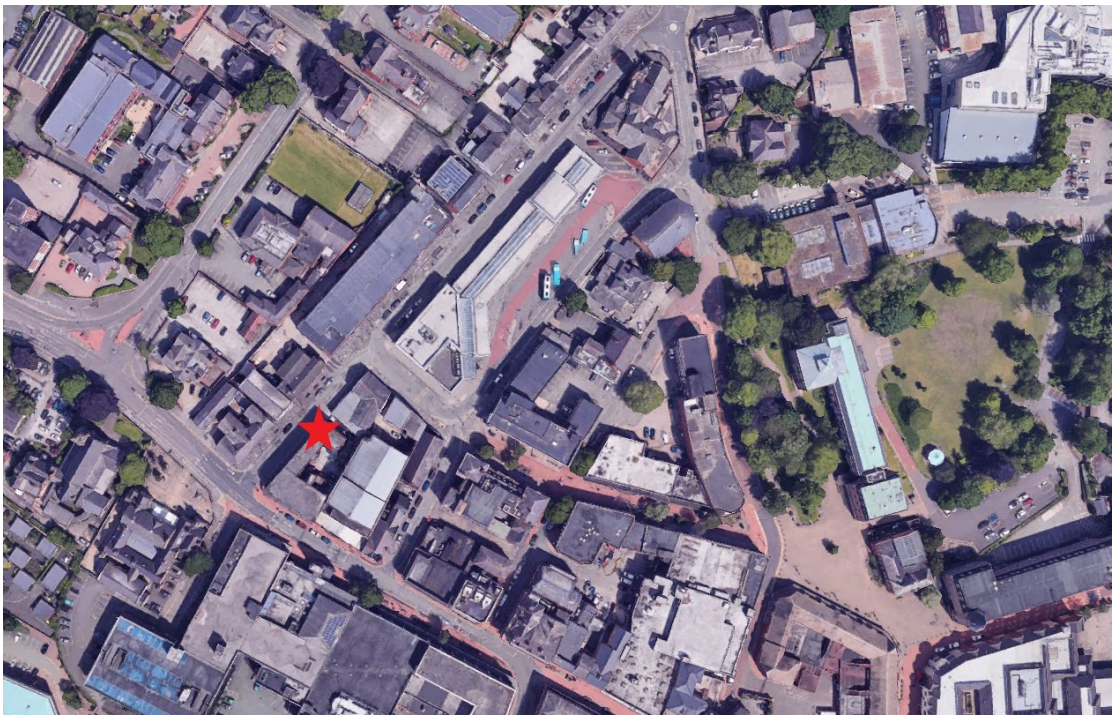
2.1 THE SITE

2.1.1 The application property is part of a three storey building containing a mix of residential and commercial uses, located facing King Street.



2.1.2 The property is located within the town centre, but sits off the main retail thoroughfare, on a side street serving the bus station. Many of the former offices within this block and within the vicinity are either vacant or have already been converted into residential flats.





2.1.3 The premises is accessed via a ground floor entrance to the rear of the building.

2.1.4 The property has bin space to the rear and cycle storage will be accommodated within the lobby of the building or in the rear yard area. There is the bus station nearby and the rail station is within easy walking distance, allowing residents the option to walk or use public transport.

2.1.5 The location allows good access to nearby services and amenities and can therefore be deemed a sustainable location that would not require dedicated parking spaces for each occupant.

2.2 Built Form of the Surrounding Area

2.2.1 The site is situated within a street that is interspersed with a variety of business uses, intermixed with residential. The closest immediate neighbouring properties are a mix of ground floor retail with upper floors in recently approved for residential use, offices and many are vacant buildings.

2.2.2 Future occupants will have access to shops/supermarkets, public open space (Library Field or Bellevue Park), leisure facilities (Waterworld/several Gyms), employment, public transport as the bus station and Wrexham Central rail station are within easy walking distance and education establishments within walking distance for the property.

3 THE PROPOSED DEVELOPMENT

3.1 SUMMARY

3.1.1 The proposed development relates to the conversion of part of the first floor of 3 King Street into an upto 6 person HMO, four bedrooms with ensuite, a shared kitchen/dining area and stairs/lobby leading to entrance to the rear at ground floor.

3.1.2 The internal layout currently consists of vacant rooms used for storage associated to the takeaway business below.

3.1.3 The secure lockable access will allow occupants to securely access their rooms, access to their accommodation will be via the existing rear doorway leading onto King Street. A communal lobby will lead up to the doors into rooms 1-4, directly off the hall.

3.1.4 The only external alteration is the insertion of an obscure glazed kitchen window on the side elevation.

3.1.5 Given the nature of the site and the town centre location, there is no external amenity space provided or capable of being provided, although the site does lie within easy walking distance of public open space, including Library Field and Bellevue Park. There are no on-site parking spaces provided, given that the site is in such a sustainable town centre location with good access to public transport, facilities and jobs, those without cars will not be troubled getting alternative transport. If necessary residents can sign up to monthly, quarterly and annual parking permits, giving unlimited parking at nearby car parks.

4 PLANNING HISTORY

4.1 CONTEXT

4.1.1 The site has the following recorded planning history.

Ref Number	Description	Decision
P/2016/1057	Installation of new shopfront (in retrospect)	Approved

4.1.2 The permitted Rights for this property remain intact.

5 PLANNING POLICY

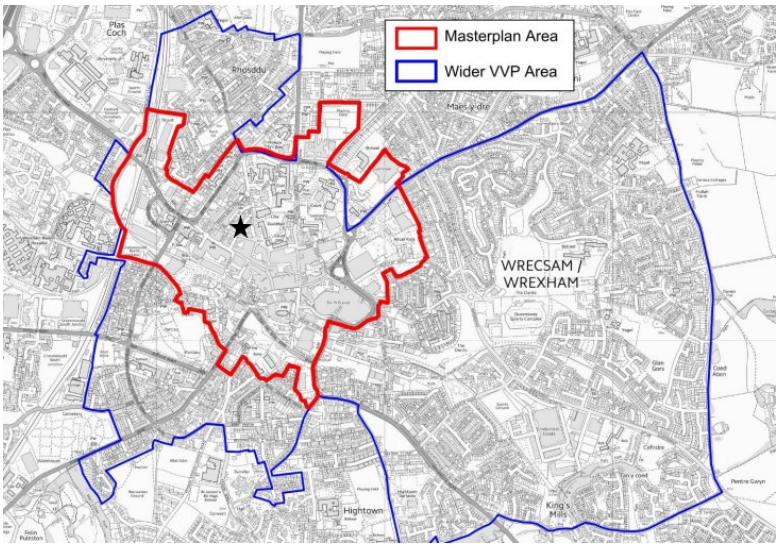
5.1 PLANNING POLICY WALES (PPW)

5.1.1 The Edition 12 February 2024 PPW sets out the Government's planning policies for Wales and how these are expected to be applied and re-iterates that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.

5.1.2 It also sets out the Welsh Government's objectives and approach to new housing provision. The principles of sustainable development underpin the policy context within PPW, and the guidance requires proposals to improve the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) and the Well-being of Future Generations (Wales) Act 2015. Place making, sustainability and accessibility are central to the guidance in PPW, as is creating vibrant town centres. Creating new residential units in a town centre location is a key element of this and will help to improve the potential for these elements in Wrexham town centre. Section 2 of PPW does embrace the concept of placemaking to improve the wellbeing of communities. The planning system should create sociable, accessible, secure, and welcoming environments.

5.2 WREXHAM TOWN CENTRE MASTERPLAN (ADOPTED APRIL 2016)

5.2.1 King Street falls within the masterplan area.



5.2.2 The findings of the Masterplan informed the adopted LDP providing the evidence base to guide how it shapes development proposals in the land use planning system. The statutory planning framework is set by the development plan (LDP).

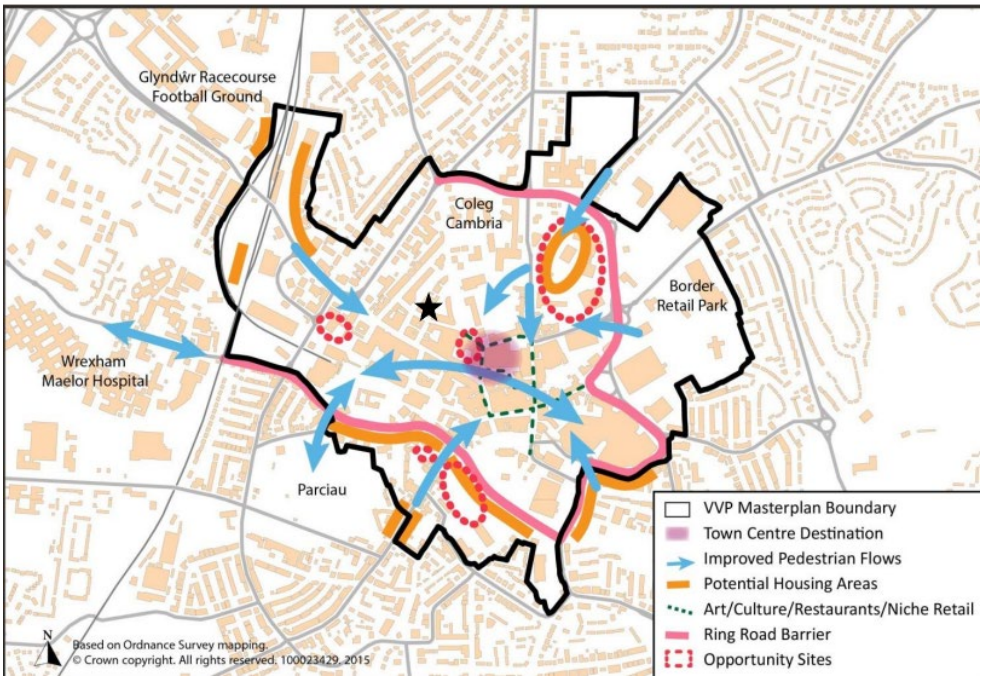
5.2.3 Key objectives of the plan is to:

"5. Provide opportunities for town centre living Provide a range of attractive housing choices within the town centre through the re-use of vacant or underused land and the conversion of vacant office space .." and;

6. "Accommodate the needs of a growing population Provide a range of facilities within the town centre needed to sustain a diverse community within an environment in which it is desirable to live and play e.g. health, schools, nurseries, sustainable transport options, multi-functional recreational spaces and leisure facilities."

5.2.4 The Key Spatial Diagram shows initiatives to improve the identity of the town centre to live and work in.

ıre 6: Key Spatial Diagram



5.2.5 The site is not identified as a protected area. With the advent of a post pandemic work the demand for office and retail space has demised and it is recognised that opportunities may be limited and not wishing to see vacant properties sterilised by holding them for retailers that may never come, a diversity of uses which support the vitality and vibrancy of the core area would be supported as mixed uses can drive footfall through the town centre.

5.2.6 The masterplan recognises that by increasing the town centre population and edge of centre population this creates a demand for retail, leisure, restaurant uses and other services that

link into the objectives for visitor attractions, evening economy and the needs of a growing population while also supporting retail. There are also opportunities to enhance the town's sense of identity through design and place making.

5.2.7 The town centre currently has very few residential properties directly within it, yet town centre living can be an attractive and sustainable option for a wide range of people including young professionals, students and an ageing population. With a number of vacant and underused buildings in the town centre there are opportunities for alternative uses. A diverse town centre population can help bring life into the town, create passive surveillance, support exiting businesses, an evening economy and new town centre uses that can help add vibrancy to the town.

5.2.8 King Street is outside the retail core, the masterplan recognises that the loss of retail space or active ground floor frontages would not be considered detrimental to the vitality and viability of the town centre and alternative uses could be supported – especially when it is acknowledged that these weaker areas may no longer be attractive destinations for such uses (clearly evidenced by the numerous "To Let" boards on many nearby buildings).

5.2.9 The masterplan (paras 3.1.9 & 3.1.10) identified that there are sites where deliverability of housing can be demonstrated, and the Masterplan supports the principle of residential development (subject to details) to encourage longer term supply. Specifically the RFA and Masterplan recognise that Lord Street and Trinity Street, both streets bounding this site, no longer serve the function of primary shopping streets as defined as such in the Development Plan. Consequently change of use to non-retail would not be detrimental to the vitality and viability of the streets and a wider range of uses that include ground floor residential and other uses that may not contribute to footfall. This proposal does not entail the loss of ground floor commercial use, rather revitalising the currently underused upper floor with a viable use that addresses housing need.

5.2.10 Key to the overall masterplan is 'to make Wrexham town centre a great place to live with a wide variety of new homes attractive to a diverse range of people with supporting social infrastructure'.

5.2.11 The Actions and Interventions for residential development are:

- Make the town centre an aspirational, attractive and desirable place to live.
- Increase the number of people living within and on the town centre;

- Increase the number of people living on the edge of the town centre & improve accessibility to the centre;
- Provide a diverse range of housing types and tenures attractive to a diverse population;
- Support the provision of facilities and services needed to sustain an increased residential population in the town centre;

5.2.12 This project delivers on these aims and aspirations.

5.3 LOCAL DEVELOPMENT PLAN (UDP) ADOPTED DECEMBER 2023

5.3.1 The following LDP policies are relevant to the determination of this application and are considered to align with the principles, aims and objectives of the PPW and are considered to carry significant weight.

Policy SP1: Housing Provision

Policy SP2: Location of Development

Policy DM1: Development Management Considerations

Policy H6: Conversion of Buildings to Self-Contained Flats or Houses in Multiple Occupation (HMOs)

Policy T1: Managing Transport Impacts

5.3.2 Both PPW and the Local Development Plan are considered to offer support in principle for the provision of residential development on this site, as proposed in this application.

5.3.3 Strategic polices SP1 & SP2 generally direct development to the defined settlement limits and seeks that development must not materially detrimentally affect countryside, landscape/ townscape character, open space or the quality of the natural environment.

This proposal complies

5.3.4 Policy DM1 All new development should: -

i. Accord with or enhance the character, local distinctiveness and appearance of the site, existing building(s) and surrounding landscape/ townscape in terms of their siting, layout, scale, height, design, density, use of materials and landscaping;

This proposal complies

ii. Not have an unacceptable effect on the amenity of the occupiers of nearby properties/land; and provide a satisfactory standard of amenity for the occupiers/users of the development itself;

This proposal complies

iii. Safeguard the environment from the adverse effects of pollution of water, land, noise, light or air, or land instability, arising from development;

This proposal complies

iv. Take account of personal and community safety and security in their design and layout;

This proposal complies

v. Prioritise walking, cycling and public transport use ahead of travel by car;

This proposal complies

vi. Not give rise to highway safety, pedestrian safety or parking problems on site or in the locality;

This proposal complies

vii. Contribute to low carbon communities through energy efficiency, be designed to minimise the use of non-renewable energy, water and the production of waste both during construction and when in use;

This proposal complies

viii. Not increase the risk of flooding but make adequate provision for sustainably dealing with foul and surface water drainage and not result in an unacceptable impact upon the water environment;

This proposal complies

ix. On sites which have previously been developed, new development proposals should make use of existing suitable building materials wherever possible for appropriate uses in order to re-use recyclable materials and reduce the amount of imported materials; and

This proposal complies

x. Ensure that any risks arising from past coal mining, as indicated on the constraints map, can be adequately managed.

This proposal complies

5.3.5 In respect of Policy DM1 (Development Management Considerations) the following in particular should be noted. There are no significant building works proposed, and no enlargement or rebuilding is necessary. The fabric of the building on site will not materially change and is therefore considered to accord with the character of the site and will ensure it continues to make a positive contribution to the appearance of the nearby locality. Visually the status quo remains the same.

5.3.6 The nearest neighbouring properties are adjacent to the site, they being offices recently granted approval for conversion to residential accommodation. The re-purposing of the floor area of this property into a small HMO does not intensify the use of the site. The occupiers of the proposed four rooms will not generate traffic as occupiers are likely to walk to work or for leisure purposes or to shop and if necessary, use sustainable modes of transport that is located within such close walking distance from the site. Given this arrangement and development proposed, the proposed reconfiguration of floorspace would have no impact on the residential amenity on any neighbour.

5.3.7 Policy T1 (Managing Transport Impacts) sets out that the Council's guidance on parking standards is to ensure development does not affect road safety or local amenity. It recognises that, occasionally, full compliance may neither be practicable or appropriate. The Council Local Planning Guidance Note No.16, on Parking Standards, sets out the maximum amount of car parking appropriate to various uses.

5.3.8 In this case the existing use should provide 5 spaces for take away use, where none are available. The lack of parking causes no issues, it is clearly acceptable due to not all residents owning a car and this being a sustainable location. The site is within walking distance to frequent public transport options.

5.3.9 Alternative modes of travel to the site will be promoted to the future occupants and it should be noted the site has good accessibility to rail and there is also the bus station very close by.

5.3.10 The approach proposed to parking will maintain both road safety and local amenity. Therefore, the proposals comply with LDP Policy T1.

5.3.11 Policy H6 requires compliance to the following:

Proposals for the conversion of existing buildings to self-contained flats or Houses in Multiple Occupation will only be supported where:

i. Conversion is possible without major alterations or extensions which would significantly alter the character and appearance of the building and locality; and

This proposal complies

ii. In order to ensure that the cumulative impact of development would not lead to the over concentration of HMOs in the locality to the detriment of community cohesion or residential amenity:

This proposal complies

a) The proposal does not result in more than 10% of all residential properties within a 50m radius of the boundary of the application site being HMOs; and

This proposal complies

b) There is a gap of at least two class C3 dwellings or other buildings not in use as HMOs between the development and any existing HMOs; and

This proposal complies

iii. The proposal does not have an adverse effect on local parking provision; and

This proposal complies

iv. The proposal will not have an unacceptable effect on the amenity of the occupiers of nearby properties or adversely impact upon the operation of nearby business premises; and

This proposal complies

v. Provision is made for a satisfactory standard of amenity for the occupiers of the development, including the provision of internal secure cycle parking area, a drying area, bin storage and private outdoor amenity space.

5.3.12 There are few C3 residential family homes nearby. The character of the immediate area is made up of multiple occupancy / shared living space, above commercial premises.

5.3.13 This site has no external space, notwithstanding public space and many leisure facilities are within walking distance for occupants to enjoy, including Belle Vue park. Bin storage in the

flats will be provided and the waste collected utilising the council's domestic refuse collection services with communal bins stored to the rear. The accommodation is provided with laundry appliances; however a local Laundrette can provide Self Service or Service Washes.

6 PLANNING CONSIDERATIONS

6.1 INTRODUCTION

6.1.1 The relevant development plan policies are contained within the PPW, and the relevant policies of the adopted LDP. The main planning considerations raised by this planning application are:

- Use
- Layout, Scale and Appearance
- Amenity
- Need/Demand for HMOs

6.2 USE

6.2.1 This planning application seeks planning permission for the change in use of the first floor associated to the hot food takeaway use to small 4 bed HMO.

6.3 LAYOUT, SCALE AND APPEARANCE

6.3.1 The proposal seeks to utilise the existing building with no material external alterations that will require planning permission.

6.3.2 The site is situated in a town centre location close to many facilities and services. The nature of the building is that it lends itself to being easily internally divided, the rooms conform to minimum room size standards and take into account the layout of the building and the existing fenestration.

6.3.3 It is generally accepted that town centre locations are appropriate locations for HMOs due to the nature of the built development and the overall density of development, making the best use of land and resources. The site comprises a building which is easily capable of accommodating the proposed new use.

6.3.4 The main policy considerations are Wrexham Local Development Plan Policy DM1: Development Management Considerations, Policy H6: Conversion of Buildings to Self-Contained Flats or Houses in Multiple Occupation (HMOs), Policy T1: Managing Transport Impacts.

6.3.5 Policy DM1 of the adopted LDP states, inter alia, that planning permission will be granted for development provided there is no adverse impact on residential amenity or the character of the area and subject to other policies of the Plan.

6.3.6 Local Planning Guidance note no.16 states, inter alia, that Planning permission will be granted for development which accord with the parking standards, with allowance for alternative means of transport.

6.3.7 Local Planning Guidance note no.5 states, Houses in Multiple Occupation can be of benefit to an area by providing low cost housing solutions for those who may otherwise have difficulty finding a place to live as well as accommodation for students, young professionals and health care workers. In fact, the Wrexham County Borough Council Housing Market Assessment (HMA, 2015)1 recognises that there is likely to be a need in the future for smaller units of accommodation in the County Borough. HMO's can go some way towards meeting this identified need. Planning Policy Wales, also requires local planning authorities to promote mixed tenure communities.

6.3.8 **Streetscene** - Given the nature of the proposal the status quo remains the same and there will be no adverse impact visually on the streetscene.

6.3.9 **Design** – The existing building will not undergo significant alteration externally; a new kitchen window will be inserted into the side elevation at first floor - retaining the character, scale, design, and materials of the original property. Internally a new staircase will be installed, noise insulation and attenuation measures between the floors of the proposed residential accommodation, and the floor area will be internally divided to create rooms served off a common hallway.

6.3.10 The proposed residential accommodation are of sufficient floor space to meet modern day living standards and the future occupiers will have the benefit of adequate amenity in terms of natural ventilation, privacy and light.

6.3.11 **Character of the area** – The urban area that the property is located in is truly mixed. It is acknowledged that large concentrations of HMO can result in problems, including damaging social cohesion, with higher levels of transient residents and fewer long term households and established families – notwithstanding, in this area there is not an established family household area, as city centre sites in this vicinity attract transient residents.

6.3.12 **Drainage -** Foul water will discharge to the Five Fords WWTWs and DCWW has confirmed consent and capacity to treat the water to safeguard against any detrimental impact upon the River Dee SAC.

6.4 AMENITY

6.4.1 **Neighbour amenity -** The application seeks permission for the provision of residential accommodation in the form of a 4 room HMO. It is considered that the proposal offers accommodation of similar standards to nearby shared accommodation. This proposal does not entail the loss of a family dwelling, it makes use of vacant space above a shop.

6.4.2 Internally the apartments are laid out in a way which makes best use of the space and existing layout and ensures that all rooms are well lit by natural light.

6.4.3 The site comprises a building with no external outside space, with the entrance to the proposed development being the existing rear doorway which is accessed from a service yard onto King Street. Bin storage and room for cycle storage is available at the rear of the property.

6.4.4 The occupants of the four rooms (who could already be resident in the city) will not put any more undue pressure on existing open space located close to the site, several nearby public parks are free at the point of use, both to future occupants of these rooms, or indeed any visitor to the city.

6.5 NEED/DEMAND FOR HMOS

6.5.1 **The UK Stats (source Landlord ZONE)–** there are 67,572 rooms needed every year (=11,262 small HMOs)

6.5.2 There are 6638 rooms disappearing every year; 277,44 New room demand every year

6.5.3 39,828 HMO rooms have disappeared in 6 years

6.5.4 4.7% of the population live in HMOs = 2.865m people live in HMOs

6.5.5 We need an extra 27,744 rooms every year with population growth

7 CONCLUSIONS

7.1 SUMMARY

7.1.1 This Statement has demonstrated that the proposed Change of Use is fully compliant with the Planning Policy Wales and the policies set out in the LDP.

7.1.2 The residential use will entail the reconfiguration of the internal space to create the HMO, utilising the vacant space above the hot food takeaway. The proposed change of use to residential does not adversely impact on the amenity of neighbouring properties.

7.1.3 The PPW identifies that a good standard of amenity should be provided for future and adjoining occupiers of land. Policies within the LDP all highlight that development needs to respect the living conditions of existing neighbouring residential occupiers and future occupiers.

7.1.4 The proposed use will provide a quality residential environment. It will help meet the Borough's need for one bed accommodation of this type, to meet the needs of individuals and couples needing to live and work in the city.

7.1.5 The site lies within the town centre and is connected and accessible to rail services, public transport, education, services and facilities. It will provide an excellent residential environment for the proposed residents, with no impact on existing neighbours.

7.1.6 The proposal development is of an appropriate density and design and would not give rise to visual or residential amenity, or highway safety concerns. It therefore accords with the relevant LDP policies.

7.1.7 As such the proposed development to change from A3 to C4 is in overall compliance with policies of the Development Plan. Accordingly, the Council is respectfully requested to grant planning permission.