CAROLINE TAMWORTH PLANNING

Planning and Development

PLANNING APPLICATION

PROPOSED CHANGE OF USE OF SECOND FLOOR FROM OFFICES TO 6 NO. ONE BEDROOM APARTMENTS

22 – 26 LORD STREET, WREXHAM,

PLANNING, DESIGN & ACCESS STATEMENT

Including Green Infrastructure

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On Behalf Of

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Planning Applications and Appeals, Change of Use Applications, Development Potential Appraisals, Conservation Areas & Listed Buildings, Planning Enforcement Issues

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1.0 The Site

1.1 The application relates to the second floor of a large commercial building within Wrexham city centre which fronts onto the pedestrianised shopping street of Lord Street and is bounded to the west by Egerton Street. The ground floor is separated into retail units with the first floor used for storage in connection with the ground floor uses. The second floor currently comprises office accommodation. A separate access to the upper floors is provided via an entrance door on the Lord Street elevation.

1.2 The building is faced with brown brick and has a white painted canopy which projects out from the retail frontage. The windows to the Lord Street elevation, and part of the Egerton Street elevation, are three panels high with white rendered sections between.



Lord Street elevation

1.3 The wider surrounding area is predominantly commercial in character with a range of small and medium businesses in operation. Lord Street contains a mix of two and three storey buildings, many of which are of a flat roof design. The ground floor active frontages comprise a variety of modern shop fronts and signage whilst the upper sections of the elevations are plain in appearance and dominated by rows of functional windows.

1.4 A site location plan is provided.

2.0 The Proposal

2.1 The application seeks permission for the change of use of the second floor of the building to provide 6 No. apartments. Each apartment will have one bedroom, an open plan living, kitchen and dining area, and a bath/shower room.

2.2 Access to the apartments will be from two flights of stairs leading off an existing entrance between the retail units on Lord Street.

2.3 No external alterations to the building are proposed with the exception of the installation of a small rooflight to provide natural light to the second floor stairwell.

2.4 A designated waste bin storage area and cycle store for residents will be provided to the rear of the building.

2.5 Detailed plans have been prepared by BRTA.

3.0 Planning Policy Context

3.1 The site is located within Wrexham City Centre on the Proposals Map that forms part of the adopted Wrexham Local Development Plan (LPD).

3.2 The following Wrexham LDP policies are relevant:

- SP1: Housing Provision
- SP2: Location of Development
- SP7: Wrexham City
- SP11: Transport and Accessibility
- SP12: Design Principles and Masterplanning Framework
- SP13: Health and Wellbeing
- SP18: Climate Change
- SP19: Green Infrastructure
- H2: Affordable Housing, Non-Strategic Housing Allocations & Windfall Sites
- H6: Conversion of Buildings to Self-Contained Flats or Houses in Multiple Occupation
- DM1: Development Management Considerations
- R2: Development within the Wrexham City Centre Masterplan Area
- R4: Development outside Primary Shopping Streets
- T1: Managing Transport Impacts
- T2: Active Travel
- MW5: Sustainable Waste Management

3.3 Advice contained within the following Wrexham Local Planning Guidance Notes is also relevant:

- 15: Cycling
- 16: Parking Standards
- 21: Space Around Dwellings
- 24: Designing Out Crime
- 27: Developer Contributions to Schools
- 28: Affordable Housing
- 30: Design
- 32: Biodiversity and Development

3.4 The Wrexham Town Centre Masterplan (2016), which sets out how the Council seeks to address current challenges, enhance its vibrancy and create a sustainable, attractive, and economically thriving urban space for residents, businesses, and visitors, has been considered.

3.5 The following National Planning Policy documents have also been taken into account:

- Future Wales: The National Plan 2040
- Planning Policy Wales (Edition 11)
- Technical Advice Note 2: Planning & Affordable Housing
- Technical Advice Note 5: Nature Conservation & Planning
- Technical Advice Note 11: Noise
- Technical Advice Note 12: Design
- Technical Advice Note 18: Transport

<u>LDP Policy SP1</u>

3.6 Policy SP1 acknowledges that the key to sustaining economic prosperity is to ensure a continued supply of new homes that meet the needs of the increasing population.

3.7 Through the policy the Council aims to support mixed, balanced, and sustainable communities by ensuring that new residential developments meet the needs of the entire community. To achieve this, new developments must maximise the opportunity to deliver affordable housing where needed and redress any identified imbalance between market and affordable housing within local housing market areas. The sustainable use of housing land is key with an aim to achieve a minimum density of 30 dwellings per hectare where possible dependent upon the site context. Providing a mix of housing unit types and tenures is important, including for those with specific housing needs.

3.8 The proposed development will provide 6 No. units for single or two person occupation who are seeking accommodation within an accessible location close to shops and services and

public transport links. The units will most likely serve key workers, young professionals and students who are looking for the convenience of city living and a low-maintenance lifestyle.

LDP Policies SP2 & SP7

3.9 Policy SP2 seeks to locate development within the defined settlement limits with the majority of new development being focussed within the city of Wrexham City areas. This is consistent with the Future Wales spatial strategy which focuses growth in the built-up areas of Wrexham where infrastructure and services are already in place close to homes and places of employment thereby reducing the need for travel by car.

LDP Policies SP11, T1 and T2

3.10 Criterion vi) of policy SP11 seeks to ensure that adequate levels of car parking are provided for developments, having taken into consideration their location and accessibility in terms of existing public transport facilities, walking and cycling.

3.11 Policies T1 and T2 seek to manage the transport impacts of development and to promote active travel.

3.12 The location of the site within the heart of the city provides access to a wide range of transport options other than the car, including walking, cycling, bus and rail which is in accordance with Wrexham Local Planning Guidance Notes 15 and 16, Future Wales and Technical Advice Note (TAN) 18.

3.13 Due to the absence of land around the building it is not possible to provide parking on-site. However, The Council's highway officer was consulted on the principle of the provision of residential units on the site as part of a pre-application exercise and noted that the highly sustainable location is unlikely to lead the Local Planning Authority requiring any additional/new parking provision to be provided as part of future development proposals.

LDP Policies SP12 & DM1

3.14 LDP Policy SP12, along with advice contained within Local Planning Guidance Note 30 and TAN 12 (Design), requires:

> *"…all development proposals to be of a high quality, sustainable design which makes a positive contribution to the creation of locally distinctive places."*

3.15 LDP Policy DM1, amongst other matters, requires all proposals to enhance the character, local distinctiveness and appearance of the site, existing building(s) and surrounding landscape/townscape by virtue of their siting, layout, scale, height, design, density, use of materials and landscaping.

3.16 No external alterations to the elevations of the building are required to accommodate the proposed change of use and as such there will be a neutral impact on the street scenes of Lord Street and Egerton Street.

LDP Policy SP13

3.17 LDP Policy SP13 seeks to promoting health and wellbeing by supporting proposals which provide access to quality housing, employment, community facilities and open space.

3.18 The location of the site within the city centre will provide opportunity for increased physical activity as walking and cycling are likely to be the preferred method of travel for future residents, which helps to lower air pollution. The absence of long commutes by car are also proven to reduce stress levels by providing more time for relaxation.

3.19 Wrexham hospital and other health services are available close-by and the city centre offers a variety of wellness-related services including leisure centres and gyms, spas, and therapy centres, making it easier to engage in activities that support mental and physical health.

3.20 City-centre living often increases opportunities for socialising due to a higher density of people and sense of community, providing frequent opportunities for social interaction, which is directly linked to improved mental health and wellbeing. City living also provides access to cultural activities such as museums, theatres, cinemas, and restaurants which all contribute to a more active social and cultural life, which can enhance life satisfaction and reduce feelings of loneliness or isolation and improve mental health.

LDP Policies SP18 & SP19

3.21 LDP Policy SP18 seeks to mitigate against the effects of climate change and adapt to its impacts by requiring development proposals to demonstrate how matters such as carbon emissions reduction, promoting energy efficiency and avoiding flood risk have been taken into account.

3.22 The proposal will make use of underused floor space within a large existing building within a sustainable location. The proposed development will assist in reducing carbon emissions by reducing the need to travel for future occupants, promoting the use of sustainable modes of transport and ensuring a good level of digital connectivity. The site is not located within an area that has been identified as being at risk of flooding and the proposed development will not increase the risk of flooding elsewhere.

3.23 LDP Policy SP19 seeks to protect, conserve and enhance green infrastructure, including waterways. There is an absence of green infrastructure on site and the land around the building will remain unaltered following the implementation of the change of use and as a result will not lead to an adverse impact on the public realm or landscape.

LDP Policy H2

3.24 This policy, along with wider local and national guidance, seeks to secure affordable housing contributions on developments providing 10 or more residential units.

3.25 As the application site lies within the South Wrexham submarket area, and proposes the creation of less than 10 units, affordable housing contribution should be sought. This view was supported in the pre-application response.

LDP Policies H6 & DM1

3.26 Policy H6 states:

> *"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*
>
> *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:*
>
> *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*
>
> *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*
>
> *iii. The proposal does not have an adverse effect on local parking provision; and*
>
> *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*
>
> *v. Provision is made for a satisfactory standard of amenity for the occupiers of the development, including the provision of a drying area, bin storage and cycle parking and private outdoor amenity space."*

3.27 The proposed development will create 6 No. self-contained apartments and, in line with criterion i), can be carried out without the need for major alterations or extension and as a result will not lead to a change in the character and appearance of the building or surrounding area. The proposal will not affect the active retail frontage along Lord Street or Egerton Street, and it is probable that the use of the second floor for residential purposes will not in fact be apparent from the public domain.

3.28 For the reasons stated above with regard to the accessibility of the site, the proposal will not have an adverse impact on local parking provision.

3.29 LDP Policy DM1 states that development proposals must not have an unacceptable impact on the amenity of the occupants of nearby properties or land and must provide a satisfactory standard of amenity for the occupants of the development.

3.30 Wrexham Local Planning Guidance Note 21 sets out space standards for residential development. There should be a distance of at least 22 metres between habitable room windows that directly face one another, and at least 13 metres between a habitable room window and a blank elevation. The building faces towards a two storey commercial building to the opposite side of Lord Street and a three storey commercial building across Egerton Street. The position of the proposed residential accommodation at second floor level will mean that it will look over the rooftop of the building opposite on Lord Street and avoid the potential for overlooking, thereby ensuring good levels of privacy. The windows on the Egerton Street elevation of the building face towards a commercial building which appears to have opaque glazing to the windows of the upper floor. As such, the possibility of direct intervisibility between the habitable room windows of the proposed apartments and the commercial use is low. Similarly, the windows to the rear of the application building look onto a yard area and there is a good degree of separation, as well as a difference in height, and this will protect amenity for future residents and the users of the surrounding buildings.

3.31 During the pre-application process the planning officer noted that as there is no new built development proposed that there would not be any additional impact on surrounding buildings in terms of overbearing or overshadowing.

3.32 The Public Protection Team was also consulted during the pre-application process who requested that an acoustic assessment be submitted with the planning application to address noise levels and put forward noise insulation and/or attenuation measures to safeguard future occupants against potential noise and disturbance resulting from city centre activities and the commercial uses below. An acoustic report is provided.

3.33 The planning officer noted that the provision of on-site amenity space for the residents of the apartments is not possible due to the lack of space. However, there are areas of open space close to the site, including Bellevue Park to the south west and the gardens at Guildhall to the east, which will provide residents with the opportunity to exercise and enjoy fresh air and a green landscape.

3.34 In line with the provisions of Policies H6 and DM1, on-site bin-storage and cycle storage area will be provided.

LDP Policies R2 & R4

3.35 Policy R2 states:

> *"Development proposals within the defined Wrexham City Centre Masterplan area should;*
>
> *i. Support the regeneration, renewal and enhancement of Wrexham City centre; and*
>
> *ii. Be compatible with the Wrexham City Centre Masterplan vision, objectives and aims."*

3.36 The Wrexham Town Centre Masterplan (2016) sets out a vision for the town centre:

> *"Central to this vision is the need for a new town centre heart with a diverse range of accessible shopping, leisure uses such as family restaurants, arts and cultural attractions, niche speciality retail in a quality public realm and environment that is identifiable as being 'Wrexham'.*
>
> *Actions to deliver an improved shopping and visitor experience need to be supported by improvements in accessibility, the public realm, housing and work opportunities to provide a mutually supportive and holistic response to the town centres issues."*

3.37 LDP policy R4 states that ground floor units will be prioritised for retail, professional services, food and drink, offices, hotels, educational establishments, leisure, commercial and other proposals that would enhance the vitality and viability of the centre. The policy also supports the conversion of the upper floors of buildings to residential use, subject to compatibility with other uses in the same building and within neighbouring properties.

3.38 The proposed development is fully compliant with the provisions of Policies R2 and R4 and the masterplan in that it will provide six quality dwellings within an underused building at the heart of the city centre. The change of use will not undermine the vitality and viability of surrounding land uses and will serve to support the range of shopping, leisure and cultural uses that surround the site. Suitable sound insulation will ensure that there is no conflict between the proposed residential use and the commercial premises below and adjacent to the site.

LDP Policy MW5

3.39 Policy MW5 seeks to secure adequate provision for waste management facilities within new development and also to minimise the generation of waste where possible, in line with the National Waste Strategy.

3.40 Adequate waste management provision for future residents will be made within the site, as identified on the submitted plans. As the development relates to an existing building, construction waste should be minimal. However, any waste materials produced by contractors during the development process will be stored tidily and taken away for recycling.

4.0 Design

Amount/Size/Use

4.1 The proposed development will provide 6 No. self-contained apartments.

4.2 The floor areas are as follows:-

Apartment 1	-	1 bed two person unit	77.3 m^2
Apartment 2	-	1 bed two person unit	72.1m^2
Apartment 3	-	1 bed two person unit	53.8m^2
Apartment 4	-	1 bed two person unit	68.6m^2
Apartment 5	-	1 bed two person unit	54.2m^2
Apartment 6	-	1 bed two person unit	64.5m^2

4.3 The apartments will provide spacious, comfortable accommodation which exceed the recommended minimum floor space requirements set out within the Welsh Development Quality Requirements 2021 (WDQR 2021).

Layout

4.4 The proposed development makes full use of the existing building.

Appearance

4.5 The appearance of the development has been addressed above.

Landscaping

4.6 Landscaping is not relevant to the proposal.

5.0 Access

5.1 The site is within a highly accessible location within Wrexham city centre and is close to public transport links. Walking and cycling are also feasible modes of transport.

5.2 The site does not currently offer any off-street parking and this will not alter as a result of the proposal.

5.3 The development will be carried out in accordance with current building regulation standards. Due to the configuration of the building, unfortunately it is not possible to accommodate a lift.

6.0 Conclusion

6.1 The proposed development will provide good quality residential accommodation in a currently underused building within the centre of Wrexham. The proposal aligns with Wrexham's Local Development Plan policies, and other local and national planning policy, and meets with the drive for an emphasis on sustainability, accessibility, community cohesion and a reduction in carbon emissions. The location of the site will promote active travel and provide a good level of amenity for future residents whilst protecting that of the established commercial uses below and adjacent to the building.

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