SUPPORTING STATEMENT

18 GERALD STREET, WREXHAM LL11 1EL

Background:

This statement is intended to explain why the application has been made why we believe that the application should be granted.

History

The property has been in operation as a House of Multiple (HMO) occupancy since March 2008, during the period to this present time it has operated quietly without nuisance!

The site:

The site is located within an area almost entirely residential in character with very few properties having their own off street parking facilities.

It is located within 0.2 Km north of the town centre of Wrexham and main bus station which is served by many regular bus services. Gerald Street is also adjacent to Wrexham Gerneral train station and is accessed from Gerald Street by a public footpath.

Gerald Street is a non through route for traffic as it is a dead end, Gerald Street and Vernon Street which is a one way route are of standard widths and traffic flows are for the most part very low and limited to access to properties, neither are not used as distributor roads.

The Proposal:

At present, the unit is occupied by 6 residents housed in 6 single occupancy bedrooms.

The applicant is closely aware of the demands for shared accommodation and has previously liaised with the Council's Housing Officers to ensure that the accommodation he has to offer meets the identified demand both in terms of location and type.

In order to respond to changing patterns of demand in regards to the flexibility of allowing couples to share suitable accommodation, which currently is in very short supply. The property given it's existing space and facilities could be used to provide this accommodation without any alteration to the exterior or interior of the building.

Planning Policy:

The Council's planning policies are set out in the adopted Unitary Development Plan

UDP Policy H4 deals with subdivision of dwellings and the explaantory text says "conversion may provide much needed smaller accommodation more quickly and cheaply than would the provision of new homes.."

Policy GDP1 requires that "all new development should .. (be).. located where it has convenient access to public transport facilites.. wherever possible." Policy T8 requires that "development granted permisison will be required to provide vehicle parking spaces either on site or nearby in accordance with the Council's current parking standards…"
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Policy H6 of the LDP deal with applications to convert properties to HMOs. Policy DM1 sets out general requirments for applications.

The Council's revised Local Planning Guidance note 4 on HMOs in 2018 . This does not set out car parking requirements which are in LPG 16. The relevant car parking standards were also revised in 2018 and now deal more explicitly with HMOs. Previously they were
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LPG 16 adopted November 2011 set out " a maximum (parking requirement) for new developments and changes of use and apply throughout the County Borough".
The standard for a house with 5 or more bedrooms is 4 spaces.
The standard for HMO is one space for two bed spaces

The revised version adopted in 2018 says:
HMOs
1- 6 bedrooms 1 space per bedroom up to a maximum of 4 spaces
7 bedrooms or more 4 spaces for first 6 bed and 1 space per 2 bedrooms thereafter.

The Welsh Government (PPW 10) says:

"…Parking standards should be applied flexibly and allow for the provision of lower levels of parking …."

Assessment:

The property has been occupied as a 6 bedded HMO since 2008 and the applicant has always endeavoured to ensure that the occupation does not affect the character or appearance of the area or the amenity of nearby residents. Prior to 2008 the property was a 4 bedroom family home.

Immediate neighbours to the side, rear and front of the property have had the applicants direct telephone number since the property was purchased in 2008 for use should their be any issues with the property or tenants that requires his attention. There have been no occasions of neighbours calling the applicant during this 16 year period.

The maximum parking standard is met because the current use as an 6 bed HMO is unchanged.

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Whilst it is accepted that the property has no off-street parking spaces, it is by no means unusual in the area and anyone taking up occupation in the area will be in no doubt of the situation.

The applicant owns a number of similar properties and has carried out survey work on the actual parking requirement for his properties and other HMO's belonging to other owners. His survey of 516 HMO bedrooms in 2016 in Wrexham showed the average car ownership to be just under 11%. That is 1 car per 9 beds.

As the parking standards are required to be applied flexibly (PPW10) and reflect the sustainability of locations, any standard must be regarded as an absolute maximum

The location of the site is some 200m from the town centre shops. as such it is situated in a highly sustainable location in terms of access to employment, transport hubs, health and community facilities and shopping areas.

Other Comments:

There is a strong demand for shared accommodation of this type, current standards, planning and licencing conditions understandably restrict the number of occupants in a property dependant on facilities and space. This property meets the planning and licencing requirements for occupancy by couples sharing suitable accommodation with the correct level of space and amenities.

Maximum parking standards

4.6 Maximum car parking standards should be used at regional and local level as a form of demand management. Turning minimum standards into maximum standards will not necessarily be appropriate. Therefore evidence based on the likely effects of different parking levels for each land use should be considered, including consideration of the relative locations of land uses and their consequent accessibility.
4.13 Maximum parking standards should not be applied so rigidly that they become minimum standards. Maximum standards should allow developers the discretion to reduce parking levels.

Residential car parking

4.15 Some car free housing development may be appropriate in locations with good walking, cycling and public transport links and in areas where parking is controlled. On-site cycle and parking provision for those with disabilities will be required if such on-street parking cannot be provided… It is essential that, prior to occupation, the future residents should be made aware of the car free status of the development.

Extract from revised LPG 5

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, Chapter 9 paragraph 9.1.2 also requires local planning authorities to promote mixed tenure communities.

Licensing

In addition to requiring planning permission, most HMOs will also need a separate licence from Public Protection.

Licensed HMOs are subject to conditions that require landlords to take all reasonable steps for the satisfactory management and maintenance of good physical standards of HMOs. These include mandatory conditions requiring certificated inspections for gas, electrical and fire safety, as well as specifying maximum occupancy numbers. There are also conditions requiring the licence holder to prevent anti-social behaviour. Breaching licence conditions can ultimately result in landlords being prosecuted and their licence being revoked. Licensing requirements are entirely separate to the requirement for planning permission and it is made explicitly clear in national planning policy that the planning system must not duplicate the controls of other regulations in making decisions on planning applications.