

Land at Corner of Brook Street & Bridge Street, Wrexham

Proposed Residential Redevelopment – Planning
Statement.

the
Planning
C o n s u l t a n c y

1. Introduction.

1.1. This Statement is submitted in support of a planning application relating to a proposal for the redevelopment of land and buildings on the corner of Brook Street and Bridge Street, Wrexham. The application has two main elements:

1.1.1. The conversion of the vacant first and second floors of Central Buildings to provide a total of ten single bedroomed apartments. The proposal also includes an amendment to the ground floor front elevation to Brook Street, in order to provide for a revised access to the apartments, together with a separate rear access leading to a courtyard area which would include a cycle storage area together with a separate bin storage area.

1.1.2. The redevelopment of the vacant site to the rear of Central Buildings on Bridge Street to provide a four-storey apartment block comprising twenty-eight single bedroomed apartments, together with parking and cycle storage to the rear to be used in relation to both parts of the development.

1.2. The following plans provide detail of the application proposals:

- Location plan 8821/L17
- Central Buildings - Existing and proposed elevations 8821/L09
- Central Buildings - Existing and proposed floor plans 8821/L10
- Brook Street – Site plan and ground floor layout – 8821/L30
- Brook Street – First floor layout – 8821/L31
- Brook Street – Second floor layout – 8821/L32
- Brook Street – Third floor layout – 8821/L33
- Brook Street – Proposed elevations – 8821/L34
- Brook Street – Apartment layout – 8821/L22
- Highway visibility splays – 8821/L24
- Refuse vehicle tracking plan – 8821/L23

The application is also accompanied by:

1.2.1. Transport Advice Note – This Note identifies no issues with the application to merit refusal. The issue of parking is addressed in further detail in a subsequent section of this Statement.

- 1.2.2. Flood Consequences Assessment – This advises that part of the Central Buildings site falls within the NRA Zone C2 on the Development Advice Map, although more recent modelling (carried out on behalf of the NRA) indicates that this is not in fact the case. However, having regard to the fact that this application relates to development on the upper floors of this building to and from which there is safe access, no flooding issues arise. The new build site is not identified as being at risk of flooding.
- 1.2.3. Acoustic Survey – Subject to standard mitigation within the construction, there are no noise issues with this proposal.
- 1.2.4. Bird and Bat survey report (and accompanying bat activity survey) – No evidence has been identified from surveys of either nesting birds or bat roosts within the building.
- 1.3. Whilst some of the above documents are referred to in this Planning Statement, they should all be read as part of the application in their own right.
- 1.4. This Planning Statement sets out the reasons why the application proposal should be viewed as an appropriate and sustainable proposal for the reuse of this site which should be granted planning permission.

2. Housing land availability considerations.

- 2.1. The starting point for the consideration of this application is that the Council cannot demonstrate a five year housing land supply. As the 2017 Housing Land Monitoring Statement confirms, this is primarily because the 'present' Unitary Development Plan has time expired and in such circumstances Technical Advice Note No 1 (TAN 1) makes clear at paragraph 8.2 that authorities in such a position will not be able to undertake a land availability study and will, therefore, be considered not to have a five year land supply.
- 2.2. However, as the Housing Land Monitoring Statement again confirms, the delivery of housing in Wrexham has declined steadily over the past decade to a low point of just 199 completions in 2016, there was an increase in 2017 to 328 completions, but this is still below the 385 dpa average within Policy H1 of the now time expired UDP and significantly less than the 516 dpa proposed within the Deposit version of the Wrexham Local Development Plan 2013 - 2028. It is clear, therefore, that there is a serious shortage of housing land, both in principle and in practice.
- 2.3. As paragraph 2.1 of Technical Advice Note No 1 explains, maintaining a five year supply of housing land is a "key planning policy requirement of the Welsh Government". The need to increase the supply of housing land in Wrexham is, therefore, a matter that should be afforded significant weight. Whilst it would be correct to say that this does not mean that all proposals should necessarily be granted permission it is an important starting point that should lend further weight to this application being approached in a positive fashion.

3. Planning policy considerations.

3.1. The following policies are highlighted as relevant to a consideration of the application proposal:

3.1.1. Planning Policy Wales (PPW) sets out its Sustainable Settlement Strategy at para 4.7, this includes identifying previously developed land and buildings and acknowledging the potential for higher density development in locations where accessibility on foot and by bicycle and public transport is good. Para 4.7.4 proceeds to emphasise that new development should as far as possible minimise the need to travel and increase accessibility by modes other than the private car.

3.1.2. Para 4.9 sets out the preference for the re-use of land with para 4.9.2. stating that many previously developed sites in built up areas may be considered suitable for development because their re-use will promote sustainability objectives.

3.1.3. In terms of specific housing policy para 9.1.1 of PPW indicates that the Welsh Government will seek to ensure that previously developed land is used in preference to greenfield sites.

3.1.4. Para 9.2.6 of PPW indicates that planning authorities should address the scope and potential for rehabilitation, conversion, clearance and redevelopment when considering sites for housing development as this assists regeneration and relieve pressure on greenfield sites.

3.2. It is clear that the application proposals would be consistent with all these objectives of National policy guidance, seeking to make use of the vacant upper floors of an existing building and providing for the redevelopment of an adjacent vacant or derelict site.

3.3. Although it is now time-expired, the Unitary Development Plan (UDP) adopts a similarly positive approach to the principle of development as proposed:

3.3.1. Policy PS1 indicates that new development for housing will be directed to locations within defined settlement limits, the application site is within the settlement limits of Wrexham.

- 3.3.2. Policy PS3 emphasises the preference for the re-use of previously developed sites, such as the application site.
- 3.3.3. Policy PS4 indicates that development should look to be located so as to help reduce the need to travel and to encourage the use of alternatives to the car; the application site is ideally located so as to provide for access to a full range of services and facilities without the need to use a car.
- 3.3.4. Policy H2 supports the principle of residential development on unannotated land within settlement limits.
- 3.3.5. Policy H13 identifies the Bridge Street/Cambrian Yard regeneration area of which the application site forms part, residential development is one of the uses identified as suitable for the area. The explanation of the policy indicates that given the location and type of housing proposed to be provided, reduced parking standards are likely to be appropriate.
- 3.3.6. The application site is also identified as lying within the area of the Wrexham Town Centre Masterplan, part of the Strategy is to encourage residential development within the Town Centre including residential development on Bridge Street (para 3.5.6) and the conversion of vacant upper floors of existing buildings (para 3.5.7).
- 3.3.7. Para 3.5.8. of the Masterplan again confirms that the principle of residential development on Bridge Street is supported in principle with the subsequent paragraph indicating that higher density development is also supported in this area.
- 3.4. It is clear that the thrust of both National and Local policy is to encourage the redevelopment of land and the reuse of buildings, both of which would result from the application proposals and the provision of 38 new apartments would also contribute to addressing the housing land shortfall within Wrexham. All of the proposed apartments would be single bedroomed units that, it is intended, will be made available for rent, the development would, therefore, meet the needs of persons who often find it difficult to access suitable accommodation on the open market. The principle of the proposal should, therefore, be viewed as entirely acceptable.

4. Access and parking issues.

- 4.1. The application proposal includes the provision of 19 parking spaces to be used by the proposed apartments, together with the provision of secure cycle storage.
- 4.2. A proposal to convert the upper floors of Central Buildings to student accommodation was refused on appeal in 2011 for reasons relating to the lack of car parking. It is important to emphasise that the reason for the Inspector's decision was, not that a scheme without parking was unacceptable in principle, but rather, because the submitted planning obligation did not include any control over the enforcement of the proposed obligation on residents not to have cars.
- 4.3. Notwithstanding the above, it is important to note that the current proposal is materially different to that related to the student development for two key reasons:
 - 4.3.1. First of all, whereas the student development had no parking whatsoever, this proposal includes a total of 19 parking spaces that will be available to residents of both the conversion of Central Buildings and the new-build development.
 - 4.3.2. Secondly, the access to the development has been designed so that the car park area can be accessed by service vehicles which can turn within the site, thereby avoiding the need for the accommodation to be serviced from the roadside (e.g. refuse vehicles, removal vehicles, general deliveries etc)
- 4.4. However, it is, of course, far from unusual for buildings in town centres not to have their own dedicated car parking, in many cases it is a function of their age, having been built before car ownership was an issue; in most cases, if these buildings are to continue to be used (as policy in the previous section clearly indicates is to be supported), then it is self-evident that a flexible attitude to parking issues needs to be adopted.
- 4.5. The Council's approach to parking is set out Local Planning Guidance Note No 16 (LPGN16). The preamble to the document notes that where developments are close to local services, such that people are able to walk or cycle to them or use public transport, it may be appropriate for less parking to be provided. Furthermore, it is also commented that consideration will be given to the proximity of public car parks and that, where people can easily travel by means other than the car, reducing the amount of car parking actually enables development land to be

used more efficiently.

4.6. The submitted Transport Note has looked at the availability of services, facilities and public transport in the locality of the application site in detail and has concluded that the location is ideal in order to encourage travel by non-car modes.

4.7. LPGN16 goes on to set out parking standards which it indicates are maximum standards, noting that there are no minimum standards. In relation to the change of use of existing buildings, it is commented that such proposals will be treated on their own merits with additional parking possibly being required when the proposed use generates a greater demand than the previous use.

4.7.1. In this case the previous, permitted, use of Central Buildings is as a nightclub. Nightclubs do not fall within any of the established Use Classes. Nevertheless, a comparison can be made with the parking requirements for Class A3, pubs, restaurants and cafes, for which LPGN16 requires 1 parking space per 4 m² of public floorspace. The application premises have a total floorspace of 442 m², assuming that one third of this was not public floorspace, then the parking requirement would be approximately 72 parking spaces.

4.7.2. By contrast, in accordance with the LPGN16 standards, 10 x 1 bedroomed apartments would require just 15 parking spaces.

4.8. Whilst it may be argued that a nightclub is neither a restaurant or a pub, it is, nevertheless, a similar activity with staff delivering a leisure activity involving alcohol to a large number of people, often in the evening/night-time periods – a nightclub will often be attended by larger numbers of people. Therefore, it is considered that it is reasonable to consider the extant use by reference to the A3 category, but even if that was not considered to be an entirely accurate comparison, it is clear that the parking requirements for a nightclub could be significantly less, but still markedly greater than the proposed use. On the above basis, and in accordance with LPGN16 guidance there should be no need to provide parking in relation to this element of the application proposals as its parking requirements are less than those associated with the existing use and there would not, therefore, be any material harm to highway conditions or safety as a result of the proposal proceeding.

4.9. A flexible approach to parking requirements in the Town Centre has been accepted by the Council in recent years (since the appeal decision relating to Central Buildings

referred to at paragraph 4.2 above), including the following two examples:

4.9.1. P/2014/0116, 32 – 36 Bridge Street – Demolition of nightclub and erection of restaurant/take-away and 10 flats. The Officer report calculated a theoretical requirement for 54 parking spaces, but just six were proposed. The site was identified as being within one of the most sustainable locations in the County Borough and, it was commented, the provision of parking would actually encourage car use within the Town Centre, consequently, permission was granted. In the pre-application consultation the LPA responded by noting that this particular site was within the area subject to Policy H13 where Policy recognises that reduced parking standards should be considered; the application site is, of course, in the same area and it is, therefore, logical that it should be viewed in a similar fashion.

4.9.2. P/2015/0272 – Trinity House, Trinity Street – Conversion of first and second floors to 21 apartments. In this case the previous office use was said to have four parking spaces, this proposal actually reduced this to three spaces, but permission was granted. Once again, within the pre-application consultation response it was noted that the site was considered highly sustainable having regard to its proximity to shops, amenities, a large local authority car park and public transport and was approved. As the Transport Note confirms, the application site also meets all of these criteria and should, again, be viewed in the same positive fashion.

4.10. The Transport Note reports the results of the 2011 Census in respect of car ownership rates within the Offa Ward, where 33% of households do not own a car, this is clearly a significant proportion of the population to whom the proposed development would potentially appeal. Different types of dwellings appeal to different people – people wanting a house with a garden are unlikely to look at an apartment for example – but it is clear that there are substantial numbers of people in Wrexham who not only would like a centrally located apartment, but who also do not own a car.

4.11. Reference has previously been made to the Wrexham Town Centre Masterplan. In addressing the objective of introducing additional residential population into the Town Centre, para 3.5.12 states:

The town centre is a sustainable location and arguments for reduced parking requirements can be made. With close proximity to the bus station which serves as a transport hub for the County Borough, close proximity to the railway stations which have seen significant growth in usage, and with great accessibility to a full range of essential services within walking distance there are excellent opportunities to reduce reliance on cars and promote sustainable transport modes thereby reducing the car parking requirements.

The Transport Note confirms these observations and also concludes that there is justification for permitting the proposed development without any requirement for parking. This is not, of course, what is proposed, but the provision of 19 parking spaces to be shared between the 38 apartments is clearly an appropriate reduced level of parking in relation to this highly sustainable location where the Council's various policy documents, as highlighted above, specifically acknowledge the potential for reduced parking levels.

- 4.12. Finally, notwithstanding the appeal decision relating to the application site itself, consideration has also been given to other appeal decisions where similar issues have arisen in the recent past. There are countless such decisions relating to proposals in London, emphasising that the issue is very much one for established urban areas, however, the following summary of decisions relates to appeals in other towns and cities (full copies of the decisions can be supplied if required). The decisions all relate to the extreme situation where no parking was proposed, but these only serve to further emphasise the appropriateness of a scheme involving reduced parking levels as is proposed in this case:

- 4.12.1. Letchworth Garden City (APP/X1925/W/16/3162259) – 18 apartments, no parking. The proposal was in a town centre location with good access to bus services and services, a significant number of town centre residents did not

own a car, but future residents would not be dependent upon car ownership to meet most of their daily needs. The Inspector concluded that the proposal would not have a severely harmful impact on the parking capacity of the area and granted permission.

4.12.2. Canterbury (APP/J2210/W/15/3140462) – 10 apartments, no parking. The Inspector concluded that the site was in a sustainable location in terms of access to local shops, services and facilities and with access to public transport and that these factors substantially reduced the reliance of residents on cars and would also discourage driving to the proposal, parking in the locality would in effect be self-managed. The proposal was concluded to be consistent with National policy which sought to manage patterns of activity to make the fullest use of public transport walking and cycling, facilitating the use of sustainable modes of transport.

4.12.3. Wallington (APP/P5870/W/15/3005475 – 8 apartments and a new café and restaurant, no parking. Although the appeal was dismissed for reasons unrelated to the parking issue, the Inspector noted a policy requirement for 60 parking spaces, albeit that this was a maximum figure. The Council acknowledged that the location was good in terms of public transport accessibility, but that current stress for parking in the area was moderate to high. The Inspector concluded that there was no reason to conclude that residents would park illegally or inconsiderately so as to pose a highway safety risk, rather, they would know that there was no parking and this would be likely to influence their decision regarding acquisition and choice of transport modes. The Inspector concluded that parking was not a reason for refusal.

4.12.4. Brighton (APP/Q1445/A/14/2223461) – 3 apartments and a commercial unit, no parking. Again, the Inspector dismissed the appeal for design related reasons, but noted that the site was close to public transport, the marina for

entertainment and shops, as well as other facilities in accessible locations. The Inspector concluded that the car free nature of the proposal could be given full weight for the benefits it would bring in reducing congestion.

4.12.5. Cambridge (APP/Q0505/A/13/2207016) – 15 apartments, no parking. The Inspector acknowledged that inappropriate car parking could cause inconvenience to existing residents, however, the proposal was close to public transport and there were secure cycle storage facilities so that the development would appeal mostly to non-car owners and the potential for harm from inconsiderate parking was minimal. However, the appeal was dismissed for other reasons.

4.12.6. Cambridge (APP/Q0505/A/12/2180931) – 5 apartments, no parking. The Inspector observed that the parking standards were maximum standards, the site was close to the City Centre, local shops, facilities and public transport, the small size of the flats also meant that car ownership would be lower than average. There were double yellow lines along roads in the vicinity and if properly controlled this would prevent inconvenient parking or parking that would harm highway safety, therefore, there was no harm from the lack of parking.

4.12.7. Brighton (APP/Q1445/A/12/2179615) – Replacement B1 unit and 9 apartments, no parking. The Inspector noted that surrounding roads were already heavily parked, but concluded that this was acceptable as its residents would be likely to favour walking, cycling and public transport which was consistent with the Government's approach to sustainable transport.

4.12.8. Portsmouth (APP/Z1775/A/11/2158278) – 41 apartments with 2 disabled parking spaces. The Inspector concluded that the site was close to services and facilities and was next to a street served by frequent bus services and within

800 metres of two rail stations and was, therefore, a location where future residents should find it convenient not to own a car. In addition the Inspector accepted the Appellants assessment of a need for 18 parking spaces based on the low car ownership rates in the locality and with available capacity within 200 metres of the site, together with the fact that the previous use must have generated parking that would also have been off-site, this led to the conclusion that parking was not a reason for refusal.

4.13. It is clear from all of the above appeals that the issue of parking in urban areas has arisen on numerous occasions previously, but a pragmatic approach has been taken by inspectors where sites are sustainably located with opportunities for access to facilities etc by means other than the private car – as is the case with the application site, as demonstrated by the Transport Note and acknowledged within the Wrexham Town Centre Masterplan.

4.14. Having regard to all of the above considerations, it is clear that the application site is sustainably located with good access to facilities by non-car modes, this is clearly a location where a reduced level of parking is justified. On this basis, no harm arises from the proposal in terms of parking or highway safety concerns.

5. Design considerations.

5.1. The design considerations relating to this development are considered in two separate parts as follows:

Central Buildings

5.2. As noted in the description of the development at the beginning of this Statement, there are few external changes that are necessary in order for the building to accommodate this proposal, these being limited to the relocation of the access to the apartments on Brook Street (so as to make more efficient use of the internal space).

5.3. On the Brook Street frontage it is proposed that the existing doorway to the upper floors be closed up with a former doorway, immediately to the left, being reopened in order to access a new stairway, this minor change will of itself be insignificant, but will assist in making more efficient use of the ground floor accommodation.

5.4. Otherwise, it is proposed that the presently painted render at ground floor level should be broken up through the use of a combination of slate and stone cladding on the Brook Street frontage and painted render on the Bridge Street elevation, all of which will assist in lifting the general appearance of the building whilst retaining its traditional character on a prominent corner.

5.5. The external appearance of the rear elevation of the property will not be altered, the existing access will be retained, providing for access from the apartments to the rear courtyard where cycle and bin storage will be provided.

5.6. It is clear, therefore, that, aside from the internal works to create the individual apartments, the building lends itself well to the proposed works and can be

converted without any significant changes to its appearance.

Bridge Street site

- 5.7. The site has been vacant since the demolition of the former terraced shops that occupied the site. Hoardings screen the site along the footway edge, but it is clear to see that the site is now overgrown and derelict, with the large scale blank elevations to buildings to either side and to the rear dominating views across the site. This is a site that detracts from the character of the area and it is clear that it is in need of redevelopment.
- 5.8. Although the buildings to either side of the site are of three storeys, the increased floor to ceiling heights within older properties, together with the pitched roof construction, means that the proposed four storey building on the application site would sit between the ridge and eaves height of Central Buildings, the scale of the proposal is, therefore, appropriate to the site, leading up to no 26 Bridge Street which is on slightly raised ground.
- 5.9. The building line on Bridge Street is at the back of the pavement, the new building is proposed to be set back behind metal fencing approximately 1.5 metres so as to maintain privacy for ground floor residents, but in overall terms this setback would be insignificant and, therefore, the development would re-establish the existing building line on this side of Bridge Street.
- 5.10. The detailed design incorporates a service and access ‘tower’ at the southern end of the frontage that would be rendered, whilst the main apartment building would have as its main facing material red brick to match that of adjacent development, however, this would be broken up with rendered panels and juliet balconies to give an attractive contemporary appearance.

5.11. In overall terms, it is considered that the proposals would result in an attractive redevelopment of the application site that would contribute positively to the appearance of the Town Centre.

6. Flood risk.

6.1. During the course of pre-application consultation, the NRW have raised issues in relation to the proposed residential use given that it is categorised as a 'highly vulnerable' use and is proposed, in part, within an area at risk of flooding. The NRW approach requests that the LPA first consider whether the proposed development is one that they would wish to support and at that point the NRW would then consider and comment on the flood risk associated with it.

6.2. It is important to put the flood risks in an appropriate context:

6.2.1. A Flood Consequences Assessment is submitted with this application, this identifies the 'problem' as being limited to Central Buildings, it does not affect the part of the site to the rear upon which the new build development is proposed. The Assessment refers to additional modelling undertaken on behalf of NRW subsequent to the publication of the Development Advice Map which concludes that even Central Buildings would remain dry in a 1 in 100 year, plus climate change, flood event, and, although some flooding may be expected in a 1 in 1000 year flood event, this would place the building outside zone C.

6.2.2. It is important to note that the proposal relates to the proposed use of the first and second floors of the building; the existing ground floor uses are entirely unaffected, consequently, the proposed use would be well above any theoretical flood level that might arise in the 1 in 1000 year event.

6.2.3. It is acknowledged that access and egress from the development is an important consideration and the proposed development within Central Buildings does have an access at ground floor level from Brook Street which could, potentially, be flooded. However, the submitted plans make clear the availability of a second access into the building from the rear which would

remain dry in all modelled conditions, consequently, there is no risk of the building being 'cut off'.

6.2.4. In dealing with an existing building, the risk of flooding clearly needs to be considered having regard to the risks associated with the current use of the building. The existing use of the upper floors of Central Buildings is as a nightclub which should also be viewed as being a highly vulnerable use. Consequently, the proposal does not propose an increased flood risk and, indeed, the number of people potentially exposed to a flood event within a nightclub would be likely to be significantly greater than the population of 10 single bedroomed apartments.

6.2.5. Finally, it should be noted that the 2011 appeal proposal for student accommodation, a similar 'highly vulnerable' use, was considered against identical National guidance and flooding was not identified as an issue.

6.3. Without prejudice to the above, Section 6 of TAN 15 recognises the need for flexibility in considering development proposals within areas of existing development that are at risk of flooding. In considering highly vulnerable development within Zone C paragraph 6.2 sets out a series of tests which are addressed as follows:

- i. *Its location within zone C is necessary to assist or be part of a local authority regeneration initiative* – See paragraphs 3.3.5 and 3.3.6 above, the site is within a regeneration area specifically identified within Policy H13 and the Town Centre Masterplan encourages the reuse of the upper floors of buildings, together with residential use. The proposal is, therefore, entirely consistent with the LPA's regeneration initiatives for this area.
- iii. *It concurs with the aims of PPW and meets the definition of previously developed*

land – Once again, see Section 3 above for analysis of compliance with PPW, the site is previously developed land.

iv. The potential consequences of a flood event have been considered and found to be acceptable – See, in particular, paragraph 6.2.2 and 6.2.3 above.

6.4. The proposal should, therefore, be viewed as consistent with the flexible approach that is set out in relation to the use of buildings within established developed areas.

6.5. For all of the above reasons, the proposed use is one that the LPA should support in the circumstances, it is clear that there is no significant risk in association with flooding and this should not, therefore, be seen as a reason why planning permission should be withheld.

7. Conclusions

7.1. The case for this application can be summarised as follows:

7.1.1. There is a need for additional housing to be granted, this factor should be given “considerable weight” in the determination of the application.

7.1.2. The upper floors of the Central Buildings have been vacant for several years, the proposal, therefore, provides a means of finding a new, sustainable, use for the vacant accommodation.

7.1.3. The remainder of the site has also been vacant and overgrown for some years and would greatly benefit from redevelopment.

7.1.4. The site is in a highly sustainable location where there is every opportunity for residents to access services and facilities without the use of the private car. In these circumstances it is clear that the proposed development with a reduced level of parking is one that should be viewed as acceptable, in line with the Council’s own policies and approach to parking.

7.1.5. No part of the development is subject to a level of flood risk that would justify the refusal of planning permission.

7.1.6. The proposals will maintain the external appearance of Central Buildings, indeed, the renovations proposed will result in its appearance being enhanced.

7.1.7. The appearance of the vacant site on Bridge Street will also be significantly enhanced through the construction of an attractive new building of appropriate scale in relation to existing properties.

7.2. For the above reasons, the application proposal should be granted planning permission.