

Offa Ward Adran Offa



Councillor : R. Alun Jenkins : Cynghorydd

The Appeal Inspector,
The Planning Inspectorate,
Crown Buildings,
Cathays Park,
Cardiff CF10 3NQ.

July 31st., 2011

Dear Sir,

**Appeal Hearing into Wrexham County Borough Council's refusal of Application P/2010/1052
for change of use and alterations to former nightclub to provide student accommodation on
first and second floors and conversion of roof space, at 4, Brook Street, Wrexham
Welsh Assembly Government Reference: 2155088
Submission by Cllr. R. Alun Jenkins**

The application is for the change of use of the first and second floors to student accommodation for 18 students, with a further 4 students housed in the converted roof space. The existing A3/Nightclub use would be retained on the ground floor and in the basement. The Council's Parking Policy for such development would require one parking space for every two bedroom spaces, a total requirement of 11 spaces, but the applicants suggest that the proposed use would be a "car free" development, a necessity given that the footprint of the building covers the majority of the site, with only a narrow entry behind the building accessed from a gate on Bridge Street.

Highway and Student issues:

The location of the building at the busy traffic light controlled junction of Bridge Street with Brook Street and St Giles Way, and the yellow line restrictions in the area, prevent easy access to the student properties, and the Council's Highways Engineer states very clearly that "without some level of parking, the proposed development would be incompatible with through traffic interests and a potential source of danger to road users and pedestrians". Even if they do not own cars, 22 students arriving and leaving each term will need to deliver their possessions to the building – either by taxi or in a relative's car. Where could they park safely? Enforcing a planning condition that students should not own cars would be impossible, and experience of other "student accommodations" in the area is that their cars are parked up in the residential areas near-by, causing added problems to already overcrowded streets.

The TAN 8 comment that planning authorities should consider "some car free development" must surely apply only to larger towns and cities, where the residential areas are protected by "Resident Parking Schemes" - there are at present no such schemes in Wrexham. The approval of the current application would set a huge precedent, and provision of car free accommodation will be seen as the answer to a prayer in the development of difficult properties and will be seen as a valid "excuse" for not having to provide necessary or adequate parking provision. I understand that proposals have already been drawn up and discussed with Planning Officers in recent weeks for the use of another site on Brook Street as accommodation for 66 students, again with no parking provision.

The Wrexham Village development on the Glyndwr campus, and the older accommodation blocks at Plas Coch already make provision for large numbers of students from outside Wrexham. The

large cuts to University funding will mean that more students will attend their local universities and live at home, fewer will come from away or from other countries. It is predicted that Glyndwr University will see a near 20% reduction in student numbers, and there is already concern that the next phase of the Wrexham Village might not now be financially viable.

We need to be very cautious that we do not allow a “glut” of un-needed purpose built student accommodation across the area which would then be difficult to adapt for other housing purposes. It is a further concern that the Planning Department would not have sufficient resources to enforce a “student accommodation” condition.

Other factors which make the Brook Street site unsuitable for “student accommodation” are:

- ❖ The converted roof space is unlikely to provide adequate accommodation for four students.
- ❖ There is no lift to carry students, especially those with disabilities either living in the accommodation or visiting friends, to the upper floors – as required by the Equality Act.
- ❖ A night Club operating till 4 in the morning, and creating noise and disturbance which is difficult to control, both within and outside the building, is hardly a suitable location for 22 students trying to live and study within. Public Protection’s comments are far from reassuring. If student accommodation was deemed acceptable on the upper floors, then it should surely be conditional on a more compatible and suitable use on the ground floor and basement, for example shop units which would operate during daytime when students are away from site at the University - but the highway/parking objections would still apply.
- ❖ The conflicting requirements for the “entry” behind the building also cause major concerns. This is designated in the application as the entrance for students, for the parking of bicycles, and as the location of the recycling containers and bins. It is already the storage area for the large wheelie bins that deal with all the bottles and waste from the Night Club, as the “smoking area” required as part of Licensing, and as the escape route onto Bridge Street in the case of an emergency. There is simply not enough space to support all this activity. The consequences in an emergency could be dire.
- ❖ Since the decision was taken by Planning Committee on 6th. June, the basement has now opened as “Voodoo Moon” and the entry is also used as part of this Bar - even more conflict in the entry area. The ground floor too is still being advertised with its current A3/nightclub permission.

For all these reasons I am in full support of Wrexham County Borough’s refusal of the above application, and hope that you will be able to support the refusal.

Yours sincerely,



R. Alun Jenkins

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