

**Subject:** FW: Planning Application P/2018/0915

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**From:** [REDACTED]  
**Sent:** 2 [REDACTED]  
**To:** David Williams (Planning Manager) [REDACTED]  
**Cc:** 'Matthew Phillips' [REDACTED] Michael Morris (Cllr Holt)  
[REDACTED]  
**Subject:** FW: Planning Application P/2018/0915

Hello,

Many thanks for the notification last week that amended plans have been submitted for this application. Thanks too for e-mailing copies of the three new documents.

I have looked at these in detail and compared them with the documents originally submitted in 2018 and with various subsequent amendments, but apart from the submission of the proposed finishes and the elevation views, the only change I can see in the layout plan for the upper floors is that one of the 2<sup>nd</sup> floor apartments in Central Buildings has been reduced in size from 48 square metres to 42 square metres.

**No further amendments have been submitted for the proposed ground floor layout or for access, car parking and bicycle storage and servicing arrangements, which presumably remain unchanged, so my strong objections to the proposals as set out in detail in my e-mail dated 21<sup>st</sup> November 2018 - copied below - still stand.**

**PARKING:**

The layout plan numbered L30 amended on the 22/9/17 shows only 19 parking places located behind the new four storey block. Our Local Planning Guidance Note 17 shows that 1½ parking spaces should be provided for each one bedroomed flat - a total of 42 spaces. Whilst this is a MAXIMUM standard, other similar developments in the area have all been required to provide a minimum of one space per bedroom, plus additional spaces for servicing and visitors - so at least 28 need to be provided rather than the 19 proposed to be consistent.

The original proposals for conversion of Central Building into student accommodation were refused planning permission, which was confirmed by the Inspector's Appeal decision on the basis that there was no parking provision. This is effectively still the position for the current application. With insufficient parking for the proposed 28 flats, there is still not parking available for the 10 flats in Central Building, so this application should be refused again for this reason.

Even considering the redevelopment as a whole to include a total of 38 apartments, LPN16 would require a maximum of 38 x 1½ or 57 car parking spaces. On the basis of consistency with previous local decisions of 1 space per 1 bedroomed flat plus provision for servicing and visitors requiring at least 38 spaces rather than the 19 proposed.

**CYCLE STORAGE**

PGN16 requires "2 secured cycle spaces per dwelling - for flats provided via safe and secure communal parking areas". The provision of only two sets of 10 spaces for the 38 flats therefore falls far below the required standard.

**ACCESS**

Bridge Street is one of the main routes in and out of the Town Centre. The proposal for the sole access point to this development to be so near the busy junction with Brook Street is unacceptable. The Bridge Street Regeneration

Area was adopted in 2003 so as to avoid such issues. In my e-mail dated 27<sup>th</sup> October, 2019 - copied below - I suggested that with the recent demolition of Scotts Night Club, the opportunity is now available to provide safe and adequate servicing and parking for the Bridge Street, Brook Street and Lea Road area in compliance with the Regeneration Area proposals, without creating additional traffic congestion and dangers on Brook Street. The current proposals for this Bridge Street site should be delayed or refused to allow consideration of safer and more sensible regeneration of the area. I would appreciate a response to my e-mail of the 27<sup>th</sup> October.

The Planning Highways Officer has also submitted very strong comments expressing his concerns about the proposals, and confirming the inadequacy of the current plans. The additional information he has requested appears to be still awaited.

#### OTHER MATTERS

My original objection in November 2018 below also deals with a number of other concerns about the proposals. The question also arises as to whether the proposals for Central Building comply with Disability requirements, as there is no lift access shown to the upper floors?

My apologies for repeating my objections to these proposals yet again and in such detail. Approving these plans now would have dire consequences for the Bridge Street area which would be difficult if not impossible to overcome for many years to come. The application has to be REFUSED to avoid this, and to allow time for consideration of more acceptable plans for the wider area.

Final point! - For the avoidance of doubt and in the interest of accuracy, the latest plan numbered L42 needs to be amended to show the correct room numbers. The plan showing the proposed third floor layout should show apartments numbered 22-28 (not 15-21), and the first and second floor layout should indicate that apartments 8-14 are on the first floor with apartments 15-21 on the second floor. With the seven apartments on the ground floor, there will still be 28 flats in the proposed new block. Similarly for the conversion of Central Building, the proposed apartments on the first floor should be numbered 1-5, with numbers 6-10 on the second floor. Also needing correction is the labelling on previously submitted plan L30 which shows the new development to be on Brook Street. It is in fact on Bridge Street. The application description too needs correction. Central Building is in fact on Brook Street, but the "adjoining land" is on Bridge Street.

Many thanks,

Alun

R. Alun Jenkins,  
Councillor Offa Ward

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**From** [REDACTED]  
**Sent:** 27 October 2019 21:49  
**To:** David Williams (Planning Manager) [REDACTED]  
**Cc:** Michael Morris (Cllr Holt) [REDACTED]  
**Subject:** FW: Planning Application P/2018/0915

Hello David,

From recently added documents on the Web site, it would seem that this application is still under consideration, and that there are still very substantial reasons as to why the current proposals cannot be supported.

Below is the objection I sent in in November 2018. The Highways Planning Officer also submitted a very strong objection to the application, yet none of the recently added documents deal with any of these issues. It is quite clear that by comparison with previous planning approvals in the Bridge Street and Pen y Bryn area, which provided one car parking space for each housing unit (regardless of the number of bedrooms), plus some staff / visitor parking, which in itself is well below our maximum standards for 1½ parking spaces for each one-bedroomed housing unit, this application provides only 19 spaces to serve a total of 28 new apartments on the demolished site, plus 10 apartments in the proposed conversion of the upper floors above Central Buildings. A previous application for the conversion of these upper floors was refused by the Council, a decision supported by the Planning Inspectorate, on the basis that the development provided no parking spaces. This latest application provides only 19 spaces behind the proposed new block of 28 apartments, well below our expectation and requirement - leaving the Central Building conversion again effectively with no parking spaces as before.

The Regeneration Policy adopted in 2003 set out to encourage more comprehensive redevelopment of the Bridge Street, Brook Street and Lea Road area, rather than trying to redevelop the area using historic footprints - amongst other reasons to be able to provide adequate and safe parking and servicing arrangements for the area. The Scotts Nightclub site was finally demolished during August and September this year, and it is quite clear now looking at the cleared sites from Bridge Street through to Lea Road how an acceptable comprehensive redevelopment of the area behind Brook Street could be achieved, probably with access and egress from Lea Road, and without causing unacceptable traffic movements and congestion and added dangers along Bridge Street and Brook Street.

The conversations you had with the owner of the Scotts Nightclub and Rollings site earlier this year showed that the approved plans for his site for student accommodation with under-croft parking are no longer viable, and that the owner will be looking for an alternative development plan. His proposal in the meantime to use the site as a public car park, accessed and egressed from Brook Street was very strongly opposed by the Planning Department, for highway safety / danger reasons.

It is quite clear that the current plans for the Central Buildings / Bridge Street site are not acceptable, and that all vehicles trying to gain access to or to leave would create considerable difficulty and danger along Bridge Street - the proposed access is dangerously close to the traffic lights at the junction with Brook Street. The small amount of space around the proposed 19 car parking spaces would make it very difficult for larger vehicles servicing the site and collecting refuse etc. to be able to manoeuvre safely within the site.

It is quite probable also that much improved plans would now be required for the redevelopment of the Scotts site. Some other buildings along Brook Street have also been empty for some considerable time, and will be looking for redevelopment.

I hope that before the Planning Application P/2018/0915 is brought before planning for determination, consideration should be given as to how to bring about a more comprehensive redevelopment of this part of the Brook Street area.

I would be interested to hear your views, and your thoughts as to how we could bring about a much more acceptable overall solution for this important area so close to the town centre.

Many thanks,

Alun

R. Alun Jenkins,  
Councillor Offa Ward

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**From:** Alun Jenkins  
**Sent:** 21 November  
**To:** David Williams (Planning Manage

**Residential Development comprising conversion of first and second floors of Central Buildings to provide 10 apartments with related alterations to ground floor level, and erection of 28 apartments on adjacent land with associated parking]**

Central Buildings (Brook Street) and adjoining land (Bridge Street) Wrexham

It is good to see that there are proposals to bring the upper floors of Central Buildings back on Brook Street into use, and to develop the derelict site of the former Wayne Saunders shop on Bridge Street, and that the site has been tidied up prior to redevelopment.

However, I cannot support the current proposals, for the reasons I explain below:

- 1 It is quite disappointing that the proposals for the ground floor of the new building are for apartments rather than for commercial or business use as had been previously envisaged to complement the eventual redevelopment of the larger site on the opposite side of Bridge Street and alongside the St Giles Way link road beneath the Parish Church.
- 2 The use of the combined site is over-intensive, with 10 flats on the two upper floors of Central Buildings and 28 flats in a new build on the adjoining empty plot - far more than can be safely and sustainably provided on this limited site..
- 3 The proposed parking provision is far from adequate, proposing only 19 spaces for the total of 38 apartments. Planning Guidance Note 16 on Parking Standards specifies a maximum standard of 1.5 spaces for each bedroom space, giving a maximum requirement of 57 parking places for this total development of 38 flats. Planning Approvals for nearby developments have been for one parking space per bedroom space, plus additional space for visitors. This would give a requirement for at least 38 spaces.
- 4 In addition, the parking space sizes illustrated are smaller than specified in PGN 16, which would make the spaces difficult to use. If provided to the specified sizes, then it is unlikely that more than 13/14 spaces could be safely provided on the remaining space behind the new buildings, whilst still providing adequate space for delivery or refuse collection vehicles to turn within the site.
- 5 The proposed entrance to the car park area from Bridge Street adjacent to the Grade 2 listed Burton Building is too close to the signal controlled junction with Brook Street for the amount of traffic that would be generated by the development, and is located at the point where Bridge Street divides into two separate lanes - into Brook Street and into St Giles Way. This is one of the busiest entrances into Wrexham Town Centre. Further, any vehicles driving from Brook Street and wishing to turn into the site could find their route blocked by vehicles driving down the hill towards the town centre, so the street could become gridlocked.
- 6 Facilities for Waste and Recycling collection for the 28 flats is shown at the rear of the property, accessed from the car park area. Whilst the refuse vehicle would enter the car park to empty the containers off-street, turn within the site and return in a forward direction back onto Bridge Street, it is not clear from the submitted plans whether such movements would be possible without affecting the free flow of traffic in both directions on Bridge Street. The arrangements for the 10 flats in Central Buildings are not acceptable. Their refuse and recycling bins would be stored in the alleyway leading to Voodoo Moon, and this would require refuse vehicles to park on Bridge Street, immediately before the traffic lights, blocking the turn into Brook Street.

Application P/2010/1052 for the conversion of Central Buildings into student accommodation was refused by the Planning Committee in June 2011 - "The development would create additional parking problems to the detriment of highway safety" - and the Appeal by the applicants was dismissed by the Planning Inspectorate in October 2011.

The document submitted by the applicant is misleading, in that it refers to the 10 flats in Central Buildings, with 19 car spaces behind, then elsewhere in the document refers to the 28 flats in the new building - with 19 car spaces behind. These are the same 19 spaces - serving the total of 38 apartments. There is no doubt that this severe shortfall would create additional problems for residents in the nearby residential areas. Experience from other

developments in and around the town centre where there has been inadequate car parking provision shows that those residents leave their vehicles in these residential areas, where there is already insufficient car parking space for all the residents that live in those localities.

Many of these points have been raised in the Highways response. In the absence of any of the revised information requested by Highways, I believe that this application has to be refused for the following reasons:

- 1 The proposed development is grossly over-intensive. The site cannot support 28 new units in addition to the 10 proposed in Central Buildings.
- 2 There is insufficient car parking. There has to be a minimum one car parking spaces per bed space. Given that there is not space for 38 properly specified parking spaces, the total number of units has to be limited to the number of safe spaces that can be provided within the site.
- 3 Unacceptable impact on Highway safety at a busy junction on one of the busiest entrance routes into the Town Centre.
- 4 Inadequate arrangements for collecting waste/recyclables, especially for the Central Buildings apartments.
- 5 Lack of privacy for those ground floor tenants facing Bridge Street, whose only windows would face directly onto the busy street.

Many thanks,

Alun

R./ Alun Jenkins,  
Councillor Offa Ward