

TOWN AND COUNTRY PLANNING ACT 1992

APPEAL AT:

**Central Buildings and adjoining land,
Brook Street, Wrexham LL13 7LH**

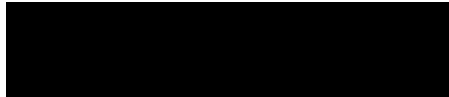
PLANNING REF: P/2018/0915

PINS REF: H6955/A/21/3277038

Start Date: 18/06/2021.

**Statement from R. Alun Jenkins,
Councillor representing Offa Ward on Wrexham County Borough Council
1, Maes Glas, Court Road, Wrexham. LL13 7SN
Telephone: Wrexham 352879**

e-mail addresses:



Planning Application P/2018/0915 for *“Residential development comprising conversion of first and second floors of Central Buildings to provide 10 no. apartments with related alterations at ground floor level and erection of 28 no. apartments on adjacent land with associated parking, Central Buildings and adjoining land, Brook Street, Wrexham”*, was submitted on the 30th October 2018.

The Site Plans submitted with the Application shows both parts of the development in Brook Street. For accuracy, the proposed 10 flats in Central Buildings are in Brook Street, but the proposed 24 new build apartments on the adjoining site are in Bridge Street.

Whilst the conversion of the upper floors of Central Buildings and the redevelopment of the adjoining site which has remained unused for some time since the demolition of the former DIY store are to be welcomed, the submitted plans show an over-intensive use of a very limited site, with inadequate parking provision, accessed from Bridge Street, one of the busiest routes in and out of the Town Centre, and with a new access point located little more than 50 metres from the busy signalised junction with Brook Street and St Giles Way which will cause greater danger in an already congested area.

On 21st November 2018, I submitted a detailed objection to the proposals to the Planning Department - copy attached - which gives a more detailed explanation of these concerns. The Highways Planning Control Manager also submitted a detailed four page objection to the submitted plans - copy attached. This expressed his concerns about the inadequacy of the proposed car parking, with only 19 car parking spaces being provided for the 28 new build apartments. In addition, the ten new apartments in Central Buildings would have no parking provision, so would have to share the 19 spaces. The total of 38 apartments for the two parts of the development would need 58 parking spaces in order to meet the maximum requirements of PGN 16 on Parking Standards.

Furthermore, he points out that in order to achieve the 19 spaces, the clearance between spaces is sub-standard. To be safe, and to allow adequate space between parking spaces, and for large servicing vehicles that will have to access the site, and be able to turn to leave in a forward direction back onto Bridge Street, it is quite clear that the site is not large enough for even 19 spaces. To meet the requirements of PGN 16, there is probably space for a maximum of 12 or 13 parking spaces.

The Highways Planning Manager questions how the agents would decide which of the 38 apartments would be allocated one of the 19 parking spaces. He comments that:

This part of Wrexham Town Centre already suffers from significant on-street parking problems . . . It is considered that without adequate parking provision, the proposed development will exacerbate the existing problems"

Other recent developments in the area have achieved one parking space for each residential unit, with additional parking for visitors and servicing. This is surely the minimum that needs to be provided for any redevelopment of this site.

Previous refusal in 2010.

In 2010/11, Planning Application P/2010/1052 (submitted 23rd December 2010) to provide 22 student units in the upper floors of Central Buildings was refused by Planning Committee on the 6th June, 2011 - for the following reason:

The development would create additional parking problems at the junction of Brook Street, Bridge Street and St Giles Way to the detriment of highway safety and contrary to policies GDP1 (d) and T8 of the Wrexham Unitary Development Plan.

The applicants appealed to the Planning Inspectorate, who upheld the decision taken by Wrexham Council, and dismissed the appeal (11th October 2011) - 3 documents attached

The current proposal to create 10 apartments on the first and second floors of Central Buildings would again effectively be provided with no parking spaces. This element of the application could therefore be refused permission for the same reasons as confirmed by the Inspector in the 2011 appeal.

Amended plans, January 2020

Amended plans were submitted in January 2020. These made minor changes to the sizes of the apartments in Central Buildings, but none of the concerns regarding unsafe access to the site, inadequate parking and servicing arrangements, refuse and recycling facilities, and cycle storage facilities were addressed in these amendments

On 20th January, I submitted a further objection to the application, in which I amplified my concerns, and restated my 2018 objections - copy attached. I also pointed out further inaccuracies in the documents submitted with the application.

Natural Resources Wales objection, 2020

On 17th October 2020, Natural Resources Wales submitted an objection to the application, as the application site falls within a C2 zone as defined within TAN 15 - is within the flood plain of the river Gwenfro:

In accordance with TAN15 A3.10, we object to the proposed development as submitted as it has failed to demonstrate that the consequences of flooding can be acceptably managed over the development lifetime. We therefore recommend that the application be refused.

Planning Committee July 27th., 2020 and January 4th., 2021.

Planning Committee considered the application at its meeting on July 27th., 2020. The recommendation was that the application should be refused, because *"The site lies partially in zone C" and as a result the development is at unacceptable risk of flooding, thus being in conflict with advice in Tan 15: Development and Flood Risk and policy EC12 of the Wrexham Unitary Development Plan"*. Committee decided **to defer** consideration of the application, to allow further consideration of the impact of the C2 area designation on preventing development of the wider Pentrefelin, Brook

Street and St Giles way corridor and the southern edge of the Town Centre. This could involve The Council, NRW, Welsh Government and the local land and property owners in the area affected.

Because of pressure from the developers, the application was brought back to Committee on the 4th January 2021, even though Covid had prevented any further discussions, and the decision was taken to refuse the application for the reasons recommended in the July 27th 2020 report.

It is this decision that is now the subject of this appeal.

Brook Street / Bridge Street Renewal Area, 2004

In July 2004, the Council adopted a Planning Brief for this area, which had 4 key objectives:-

- i) Guide change by providing a framework within which appropriate development can be brought forward.
- ii) Promote sustainable development.
- iii) Promote high quality of design of buildings and places.
- iv) Highlight the need for a comprehensive approach to integration of the regeneration area, and the need for landowners to work together to achieve the objectives of the strategy.

With the complications of C2 Zone flood risk, the need for land owners to work together to bring about comprehensive redevelopment of the Brook Street and Bridge Street area rather than to try to develop land along historic footprints is now greater than ever. Safer access to all the land behind the Brook Street frontages from Bridge Street through to Lea Road could be achieved by such comprehensive working together, which would achieve greater and more acceptable development, and could also overcome the difficulties of the C2 status for this wider area.

Summary

The application has to be refused for the flood risk reasons, but apart from these reasons, all the original objections to the application still apply. These can be summarised as follows:

- 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 The dangerously placed entrance would have an unacceptable impact on Highway safety at a busy junction on one of the busiest entrance routes into the Town Centre.
- 4 There are inadequate arrangements for collecting waste/recyclables, especially for the Central Buildings apartments., and for the storage of bicycles.
- 5 There would also be lack of privacy for those ground floor tenants facing Bridge Street, whose only windows would face directly onto the busy street.

I trust that you will consider these submissions, and will be able to REFUSE planning permission not only for the flood risk reasons, but for all the other reasons too.

Many thanks,

R. Alun Jenkins, Councillor Offa Ward.

July 14th., 2021.