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PLANNING

38-41 High Street, Wrexham
DESIGN, ACCESS AND PLANNING STATEMENT
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Design, Access and Planning Statement



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1. Introduction

- 1.1 This Design, Access and Planning Statement has been prepared in support of an application for listed consent for the conversion of part of 38-41 High Street, Wrexham, which are Grade II listed buildings, into 23 residential apartments. The associated historic impact assessment considers the historic context of the building, and the potential impact of the alterations on this.
- 1.2 The Town and County Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 requires a pre-application consultation to be undertaken for development comprising “major development”. The definition of “major development” is set out in the Town and Country Planning Act 1990 (as amended) and is as follows:

“major development” means development involving any one or more of the following—

- (a) the winning and working of minerals or the use of land for mineral-working deposits;
- (b) waste development;
- (c) the provision of dwellinghouses where—
 - (i) the number of dwellinghouses to be provided is 10 or more; or
 - (ii) the development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (c)(i);
- (d) the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; or
- (e) development carried out on a site having an area of 1 hectare or more;

The definition of a “dwellinghouse” is set out in the Town and County Planning (Development Management Procedure) (Wales) Order 2012 and is as follows:

“dwellinghouse” (“*tŷ annedd*”) does not include a building containing one or more flats, or a flat contained within such a building;

As a consequence, the flats that are proposed do not comprise ‘dwellinghouses’ and it is therefore considered that the proposal does not result in the requirement to undertake a formal pre-application consultation process.

- 1.3 The property was originally separate buildings and forms a key part of Wrexham High Street. It lies adjacent to the historic Grade I listed St Giles Church which dates back to the 16th Century.

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- 1.4 There are a number of other listed buildings in the vicinity of the site and the site lies within the Wrexham Conservation Area. The ground floor of the application site has recently received planning and listed building consent for an A3 restaurant use. The ground floor of numbers 38 and 39 were historically used for retail uses while the ground floor of 40 – 41 was the bank.
- 1.5 This statement details the site's main characteristics, the proposals, relevant planning policies and the application's main considerations. It should be read in conjunction with the accompanying Heritage Impact Assessment (HIA).

2. The site and context

- 2.1 The site, 38-41 High Street is, as the address implies, within the town centre of Wrexham and is situated on the south side of the street. The building fronts onto the High Street where it is a prominent building, with the rear opening onto Temple Row and facing towards the historic church.

Figure 2.1 Aerial photograph showing the location of the site



Figure 2.2 Frontage of 38-41 High Street



38-39 High Street



40-41 High Street

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- 2.2 Whilst both properties are three storeys, they are different in height and scale, with 40-41 High Street being the more prominent and taller building. 38-39 High Street has had retail uses on the ground floor for many years with offices above, whilst 40-41 High Street was used as a bank until relatively recently.
- 2.3 As stated in the list description, and supported by the historic deeds for the properties, numbers 38-39 were built as a single house but later subdivided into two and is thought to date back to the 18th Century, which is confirmed by documents from 1793 where the building is already in existence. The full list descriptions can be found in the appendix of the Heritage Impact Assessment. The current building at 40-41 High Street is thought to be rebuilt on the site of an earlier building and date from the 19th Century, although internal timber framing does indicate that the original 18th Century building could have been altered rather than completely replaced. As stated in the list description, the buildings form part of a wider important group of buildings on the High Street.
- 2.4 Numbers 38 / 39 were first listed in 1980 and numbers 40 / 41 in 1994 and as a consequence, some inappropriate works, mostly internal, had been carried out prior to the buildings being afforded the protection listing provides.
- 2.5 The use of numbers 40-41 as a bank previously is evident from the ground floor front façade and permission has been granted for the conversion of the ground floor into a restaurant.
- 2.6 As stated above, the site comprises listed buildings within the Wrexham Conservation Area. It is also within the non-shopping key town centre area as set out in policy S3 of the adopted Wrexham Unitary Development Plan (UDP).
- 2.7 Recent relevant planning history for the buildings is as follows:

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Table 2.1 Relevant Planning History

Reference	Proposal	Date of permission
P/2012/0623	38-39 High Street Advertisement consent for the installation of 2 no. non illuminated fascia signs (retrospective)	01/10/12
P/2012/624	38-39 High Street Listed building consent for the installation of 2 no. non illuminated fascia signs and re-painting of shop front (retrospective)	10/10/12
P/2019/0330	38-41 High Street Change of use of ground floor to A3 use (partly retrospective)	02/01/20
P/2019/0488	38-41 High Street Change of use of ground floor to A3 use (partly retrospective)	02/01/20

- 2.8 The accompanying HIA contains further information in relation to the architecture, history of the site, the relevant heritage assets and the potential impact on these.

3. The proposed development

- 3.1 The proposed development relates to the conversion of the first and second floors of 38-41 High Street into 23 open market apartments in total. The internal layout of both properties has previously been considerably altered over the years to accommodate the office uses. The apartments will contain a bedroom and en-suite together with kitchen facilities.
- 3.2 Access to the first and second floors from the ground floor will be using the existing staircases and entrances. There were previously offices on the upper floors of both buildings and in 38-39 there is currently a large room to the front and two smaller rooms to the rear, along with the staircase / landing area. It is proposed to subdivide the front room into three units, and to provide two in the rear wing using the existing rooms, although reconfiguring the existing walls to some degree as can be seen on the plans. There is a similar arrangement to the second floor i.e. three units to the front and two at the rear. The proposal therefore provides five apartments on both the first and second floors, making a total of 10 for 38-39 High Street.

Figure 3.1 Photograph of first floor front room 38-38 High Street



Figure 3.2 Photograph of staircase in 38-39 High Street



Figure 3.3 Photographs of second floor 38-41 High Street



- 3.3 As can be seen from the photographs above, little of the historic detailing and features remain, other than the evidence of some timber joists and other key timber work.
- 3.4 40-41 High Street would provide six apartments on the first floor, along with the plant room, and a further seven on the second floor, along with laundry facilities.
- 3.5 Given the alterations that have taken place over the years, the proposals do not impact on historic features of any significance. Further details can be found in the accompanying HIA.
- 3.6 Given the nature of the site and the town centre location, there is no external amenity space provided or capable of being provided, although the site does lie adjacent to the

grounds of the Church which are accessible to the public. Similarly, there is no on-site parking provided but the site is in a sustainable town centre location with good access to public transport, facilities and jobs.

- 3.7 In the past some of the windows have been replaced with later inappropriate new window openings i.e. for the toilets, and it is therefore proposed as part of the works to replace these with more appropriate windows that are in keeping with the listed status of the buildings. All other existing windows are to be retained, repaired and have secondary glazing installed.

Use

- 3.8 As set out above, the proposed use involves a change from predominantly office space to residential accommodation in the form of apartments.

Amount and scale

- 3.9 The site is situated in a town centre location close to many facilities and services, with a restaurant on the ground floor. Whilst there are 23 one-bedroom apartments proposed, the open plan nature of the upper floors of the building that are a result of previous alterations lends itself to being easily divided. The apartments vary in size to take into account the layout of the building and the fenestration.
- 3.10 It is generally accepted that town centre locations are appropriate locations for apartments due to the nature of the built development and the overall density of development, making the best use of land and resources. The site comprises large three storey buildings which are easily capable of accommodating the proposed new use.

Appearance

- 3.11 Few changes are proposed to the exterior of the building, other than for example, a reconfiguration of the external pipework and the replacement of some windows with appropriate and more historically accurate replacements.

Layout and access

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- 3.12 The site comprises the building with little external outside space, with the entrance to the proposed development being onto the High Street and these provide the required access into the building. No parking is proposed on the site.
- 3.13 Internally the apartments are laid out in a way which makes best use of the space and existing layout and ensures that all apartments are well lit by natural light.

4. Policy context

- 4.1 National and local planning policy guidance considered relevant to the principle of this development is set out in this section.

National planning policy and guidance

- 4.2 The proposal relates to the conversion of existing listed buildings to residential apartments. Relevant national planning policy is set out in:
- Planning Policy Wales (PPW) Edition 10 (2018);
 - Technical Advice Note (TAN) 12 Design; and
 - Technical Advice Note (TAN) 24 The Historic Environment.
- 4.3 There is also guidance set out in a number of Cadw documents outlined in the accompanying HIA.

Planning Policy Wales Edition 10, 2018

- 4.4 This sets out the national planning framework for Wales and paragraphs 6.1 to 6.1.32 relate to the historic environment, setting out the Welsh Government's objectives in relation to this. It also sets out the Welsh Government's objectives and approach to new housing provision. The principles of sustainable development underpin the policy context within PPW and the guidance requires proposals to improve the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) and the Well-being of Future Generations (Wales) Act 2015. Place making, sustainability and accessibility are central to the guidance in PPW, as is creating vibrant town centres. Creating new residential units in a town centre location is a key element of this and will help to improve the potential for these elements in Wrexham town centre.

Technical Advice Note 12 Design

- 4.5 This sets out the Welsh Government's guidance on ensuring good design which is sustainable and includes ensuring that the character and layout is appropriate for the context of the development.

Technical Advice Note 24 The Historic Environment

- 4.6 The purpose of this Technical Advice Note is to provide guidance on how the planning system considers the historic environment during development plan preparation and decision making on planning applications that impact on the historic environment. It provides specific guidance on how the various aspects of the historic environment should be considered during this process.

Local planning policy and guidance

- 4.7 The adopted development plan consists of the Wrexham Unitary Development Plan (UDP) 1996-2011, which was adopted on 14th February 2005. Its replacement, the Wrexham Local Development Plan (LDP) has been through the examination process but the Inspector's report has not yet been received and for development management purposes, the adopted development plan remains the UDP. Table 4.1 below provides a summary of local planning policy which is of relevance to the proposed development.

Table 4.1 Summary of local planning policy and guidance

Policy	Summary of proposal
Strategic Policy PS1	This generally directs development to defined settlement limits.
Strategic Policy PS2	Development must not materially detrimentally affect countryside, landscape / townscape character, open space or the quality of the natural environment.
GDP1 Development Objectives	All new development should: a) Ensure that built development in its scale, design and layout, and in its use of materials and landscaping, accords with the character of the site and makes a positive contribution to the appearance of the nearby locality. b) Take account of personal and community safety and security in the design and layout of development and public / private spaces. c) Make the best use of design techniques, siting and orientation in order to conserve energy and water resources. d) Ensure safe and convenient pedestrian and vehicular access to and from development sites, both on site and in the nearby locality. e) Ensure that built development is located where it has convenient access to public transport facilities, and is well related to pedestrian and cycle routes wherever possible. f) Ensure the safety and amenity of the public and safeguard the environment from the adverse effects of pollution of water, land or air, hazards from industry and quarrying, and associated noise, odour or vibration arising from development. g) Secure public services (e.g. gas, water, electricity) to development at minimum public cost. h) Safeguard sites and areas of nature conservation and wildlife interest, and to provide new habitats where there is an unavoidable loss of existing habitats and areas of wildlife interest.

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	i) Ensure that development does not result in, or is subject to, flooding, soil erosion, landslides or contamination, either on or off the site. j) Have regard to the need to safeguard those areas that possess a strong Welsh cultural and/or linguistic identity from development that could harm this identity. k) Secure the development of sustainable communities, through the promotion of the economic, social and environmental well-being of the area.
EC7 Conservation Areas	Within, and in close proximity to, conservation areas, the priority will be to preserve and/ or enhance those buildings, structures, streets, trees, open spaces, archaeological remains, views, and other elements which contribute to the unique character of the area. New buildings and alterations or additions to existing buildings in conservation areas, whether listed as of special architectural or historic interest or not, must reflect the design and character of the area as a whole and the form, scale, detailing and materials of existing buildings.
EC9 Listed buildings of Special Architectural or Historic Interest	Alterations or additions to, and development or redevelopment within the curtilage of, buildings or structures listed as of special architectural or historic interest must respect the setting and character of the listed buildings or structures.
EC11 Archaeology	Development which would adversely affect the site or setting of a Scheduled Ancient Monument or archaeological site of national significance will not be permitted. Development that directly affects non-scheduled sites of archaeological importance will only be permitted if an archaeological investigation has been carried out to determine the nature, extent and significance of the remains, and this investigation indicates that in-situ preservation is not justified, and a programme of excavation and recording has been agreed. Development will also be carefully controlled to ensure that the setting of non-scheduled sites of archaeological importance is not harmed where appropriate.
H2 Residential Development (of unannotated land) within Settlements	Residential development on unannotated land within settlement limits will be permitted subject to compliance with Policy GDP1.
H7 Affordable Housing	Where there is a proven lack of affordable housing to meet local needs, the Council will negotiate with developers to provide an element of affordable housing in new proposals of 25 or more homes. The initial benefit of discounted prices will be retained for subsequent and future occupants through the scheme's management by a suitable local housing body with the aid of legal agreements.
T8 Parking	Development granted planning permission will be required to provide vehicle parking spaces either on site or nearby, in accordance with the Council's current parking standards. Special regard will be paid to the following factors, as appropriate:- a) the availability of public transport nearby, b) proximity to public car parking, c) proximity to local services and facilities, d) road safety hazards and amenity considerations arising from on-street parking in the vicinity of the site. Where implementation difficulties arise in making parking provision on-site or nearby, the Council will require a developer to make financial contributions for measures to assist public transport, or walking and cycling as appropriate.

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- 4.8 The relevant policies for this application that are within the deposit LDP are broadly similar in their overall approach to those set out in the adopted UDP in terms of the location and type of development proposed.
- 4.9 There are also a number of relevant local planning guidance notes including:
- LPGN04 Conservation Areas;
 - LPGN06 Access to and use of buildings;
 - LPGN16 Parking standards; and
 - LPGN21 Space around dwellings.

5. Main considerations

5.1 The main considerations in relation to this application are as follows:

- Principle of development
- General and residential amenity
- Access and parking;
- Waste and recycling; and
- Historic Environment.

5.2 These are discussed in turn below.

Principle of development

5.3 38-41 High Street is situated in the settlement limits of Wrexham where there is a general presumption of appropriate development being acceptable. National and local planning policy encourages the sustainable use of land and where appropriate, an increase in density.

5.4 Policy H2 of the Wrexham UDP relates to unallocated sites for residential development that are within the settlement limits and states that proposals should be in line with the general policy GDP1. The proposal is considered to be in line with policy GDP1 as it is in line with the relevant criteria. It is also in line with PPW as it makes the best use of resources by finding a new use for an existing building which is in a sustainable town centre location, and which provides a high density development that creates essential housing provision. The creation of new housing accommodation can help to bring new life and vitality into town centres and to support town centre businesses, which is a key priority of many areas. As in this instance, many business uses previously found on the high street have ceased and new uses are having to be found for town centre properties.

5.5 One of the key elements of PPW is the maximisation of well-being and creating sustainable places through placemaking. One of the key principles is creating and sustaining communities and in respect of this PPW says that the planning system must work in an integrated way to maximise its contribution to well-being. It also advises that 'it can achieve this by creating well-designed places and cohesive rural and urban communities which can be sustained by ensuring the appropriate balance of uses and density, making places where people want to be and interact with others. Our communities need the right mix of good quality / well designed homes, jobs, services,

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infrastructure and facilities so that people feel content with their everyday lives'. This emphasises the need to have a town centre that provides a mix of uses, including residential uses. It also states in paragraph 4.2.22 that higher densities must be encouraged on sites in town centres and other sites which have good walking, cycling and public transport links.

- 5.6 In addition to this, paragraph 4.3.33 states that 'Vibrant and viable centres are distinguished by a diversity of activity and uses which should contribute towards a centre's well-being and success, whilst also reducing the need to travel'. The proposal is therefore considered to be in line with the key principles of PPW.
- 5.7 The housing to be provided will assist in providing accommodation for those who can either not afford larger and more expensive accommodation, as many are priced out of the current market. And it will provide this in a location where a car is not required as occupants will be able to walk to work or use public transport which will reduce reliance on the use of private cars.
- 5.8 Policy H7 of the UDP relates to affordable housing and requires an element to be provided for new proposals of 25 or more homes. As the proposal is for 23 apartments, the threshold for providing affordable housing is not reached and therefore no contribution is required.
- 5.9 Whilst the 5 year housing land requirements set out in Technical Advice Note 1 have been removed at present, it is noted that there is a current lack of housing supply in Wrexham. In addition to this, the Wrexham Local Housing Strategy shows that there is a high demand for one and four bedroomed properties (page 29), with this proposal providing a much needed contribution to the number of one bedroomed properties in a sustainable town centre location.

General and residential amenity

- 5.10 The apartments will be located in the town centre and above a restaurant however in order to ensure any potential issues in relation to noise are overcome, sound proofing will be installed between the apartments and the ground floor use, as well as between the individual apartments. In terms of external noise, secondary glazing is to be

installed and it is acknowledged that can provide better sound insulation than double glazing.

- 5.11 Being located in the town centre the apartments do not have any outdoor amenity space, as is usual with this type of development in town centres.

Access and parking

- 5.12 Access to the apartments is via the entrance shown on the accompanying plans and is directly from the High Street and these provide the required access standards.
- 5.13 No parking is provided with the scheme as it is not possible to provide on-site parking. It is noted that the High Street comprises a bus lane, traffic lane and short stay parking. The site is situated in a town centre location close to main facilities and services, and close to good public transport links. The proposed use replaces the previous office uses and therefore does not result in significant new parking requirements. Wrexham County Borough Council does not have minimum parking standards and Local Planning Guidance Note 16 Parking Standards states that for changes of use of existing buildings / sites, proposals will be judged on their own merits.
- 5.14 Given the highly sustainable and central location of the site, it is considered appropriate that no on-site parking is provided as outlined above. In addition to this, there are existing traffic regulation orders in place in this area which will mean that there will be little risk of on-street parking issues arising.

Waste and recycling

- 5.15 In terms of waste bins and recycling, a waste management study was undertaken by Gaskells who worked out the average waste that would be created from 23 studio apartments. Following on from this, there is an internal bin store within the lobby area capable of storing the required waste and recycling bins i.e. 3 x 240l recycling bins and one large 1100 litre eco bin which will be emptied 3 times per week. This is sufficient to service the identified need all the apartments and the cost would be covered by the landlord. No bins are to be stored outside and on collection days the bins will be collected at the front on High Street and returned to the bin store afterwards.

Figure 5.1 Ground floor plan showing bin store



Historic environment

- 5.16 As stated above, 38-41 High Street are listed buildings located within a conservation area. As such the site is historically sensitive, in terms of both the internal and external works. The upper floors of the buildings have previously undergone significant internal alterations that have removed most original features and the original layout of the buildings. As a consequence, the proposals do not impact significantly on the plan form or result in the loss of features. Any features that do remain are to be retained. Externally, few changes are proposed other than the removal of later window alterations and replacement/reinstatement of a small number of other windows as outlined in the accompanying HIA. Therefore, it is not considered that there will be a detrimental impact on either the conservation area, the listed building itself or nearby historic assets.

Other design considerations

Materials

- 5.17 There will be minimal alterations to the exterior of the buildings as part of this proposal. Those that are proposed relate predominantly to window and door openings, and all

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changes will be of appropriate designs and materials as set out in detail in the accompanying HIA.

- 5.18 Internally the changes relate to a building that has already undergone significant alterations and few original features, and therefore materials, remain. It is therefore proposed to use modern materials to sub divide the layout and this will also help to differentiate between the old and the new. There are some requirements that arise from the building control aspect in terms of sound, fire etc and these include, for example, the incorporation of secondary glazing which improves noise transmission and also reduces heat loss whilst retaining the original fabric of the building.
- 5.19 As internally no historic doors remain and there are only modern doors, the installation of fire doors in order to achieve the required fire escape times does not necessitate the removal or alteration of historic doors.

Environmental sustainability

- 5.20 The proposal involves the re-use of an existing historic building and is in this respect sustainable as it does not involve the erection of a new building with the resources that this would require. As the property is listed, the opportunities to improve environmental sustainability are limited as they could affect the historic character of the building which would not be appropriate or acceptable. However the introduction of secondary glazing will be beneficial, as will the incorporation of appropriate roof insulation.

6. Conclusion

- 6.1 The proposed creation of apartments at 38-41 High Street Wrexham is intended to provide much needed residential accommodation in a highly sustainable location. Section 5 above outlines the national policy principles and guidance, as well as the local policies, as shown the proposal is in line with these, in particular placemaking and the principles of sustainable development. The proposal also provides a new use for listed buildings which will help to ensure that they are maintained and preserved for future generations. For the reasons set out above, the proposals are considered to be in line with the relevant policies and guidance, local and national, and are in line with the current accepted conservation principles.
- 6.2 Therefore, as demonstrated in this statement and the accompanying Heritage Impact Assessment, and given the previous alterations internally, it is considered that the proposals do not result in an unacceptable detrimental impact on the listed buildings.
- 6.3 It is therefore considered that the proposals are appropriate in planning terms.

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