



**Bob Dewey
PLANNING**

GROUND OFS OF APPEAL

PROPOSED CONVERSION OF DWELLING INTO FIVE BEDROOM HOUSE IN MULTIPLE OCCUPATION at 33, PARK STREET, WREXHAM

Planning Policy:

The development plan is the Wrexham Unitary Development Plan adopted in 2005. The replacement LDP has now been submitted to Welsh Government for consideration by an Inspector.

The Council has also adopted Local Planning Guidance 5 which relates to proposals for “conversion of dwellings to houses in multiple occupation.

Reasons for refusal:

The Council says:

“1. The proposed development does not make adequate provision for the parking of vehicles clear of the adjoining carriageway and will therefore increase problems of on street parking in the vicinity. It is therefore contrary to policy T8 of the Wrexham UDP

2. The amenity area is considered substandard and does not provide sufficient space for the storage, drying areas or recreational space for future occupants. To allow the development would therefore be contrary to policy H4 (c) of the adopted Wrexham Unitary Development Plan,”

SUPPORTING INFORMATION:

The Council’s refusal reasons are based solely upon a short debate in the Planning Committee meeting held on 7 January 2019.

It does not accord with the professional recommendation made by the Council’s Planning Officers.

There are two reasons for refusal:

- 1 relates to inadequate car parking
- 2 relates to lack of amenity space

PARKING

The Council revised its car parking standards in 2018. The Guidance is set out in LPG 5 and 16.

LPG 16 deals with car parking for HMOs and now sets the MAXIMUM standard. For 1 - 6 bedroom HMOs it is 1 space per bedroom up to maximum of 4 spaces

The revision was subject to public consultation with the bulk of the reported concerns related to the impact of concentration of HMOs in an area. It is not clear how the question of car parking arose nor on what basis the standard was changed.

The Council's officers had undertaken a survey of parking demand from existing HMOs in Wrexham. That survey is included in this report. The applicant's agent undertook a very similar exercise which showed a very similar pattern.

The surveys both show that the actual demand is typically in the range 10% to 12%.

Thus. In practice, the requirement would be 0.6 spaces for 5 beds and 0.96 for a full 8 bedded unit.

Based upon the existing use as a 3 / 4 bed house, the parking standard would be 3 spaces.

It is self-evident that the existing houses have inadequate parking – the road is barely wide enough for parking along one side and it is presumed that some residents use the small public car park located on the Park Street/Rhosddu Road corner. Given the severe lack of parking for some 27 house along the most restricted part of the road, it is not unreasonable to think that some residents may not own cars. Certainly, any occupier of this proposed accommodation would be ill advised to take up residence if she/he owns a car.

The recently published Planning Policy Wales 10 repeatedly emphasises the desire to Welsh Government to reduce the reliance of people on private car ownership. Some extracts are appended to this statement. The draft Local Development Plan (now awaiting consideration by a Local Planning Inquiry inspector firmly supports this approach: (see draft policy T1

Proposals for new development will be supported where they:

- i. Facilitate increased journeys by more sustainable modes of travel first by walking and cycling, then by public transport and finally by private motor vehicle;

This site must be seen in the context of the immediate locality which has:

Wrexham Town centre and bus station 800 m

University .1200m

Railway Station 1400 m

Rhosddu Rd bus stop 125m

Chester Rd bus stop 400m

Rhosddu bus service – 3 busses per hour 6 am to 11 pm

Chester Rd - 5 busses per hour to Chester 5.45 am – 11 pm

AMENITY SPACE

The existing use as a single dwelling has below the 50 sq m normally thought to be adequate for private open space. Several of the adjoining properties have built extensions which reduce their open space further. Nevertheless, the residents appear not to have a problem with this smaller provision.

This is a densely developed urban area where the full provision is unlikely to be feasible. There are large public open spaces some 400 m away on either side of Rhosddu Road with plenty of sitting out areas. There are allotments adjacent to Chester Road.

The plans clearly demonstrate that there is adequate bin space and cycle parking.

The Council's guidance note clearly says

“where existing dwellings are to be converted to HMOs falling within use class C4 then it is likely that they will already have a curtilage that will adequately fulfil this function.”

CONCLUSION

The Council's planning officer recommended approval and at the meeting advised the committee that the proposal met the requirements of their policy. He told them that the rear yard was 'OK' for the bins and amenities. In his view, “...a 5 bed unit would not generally require more (parking) than the existing and in many cases probably less...”

This is a proposal to bring a property into a viable use and provide much needed accommodation for people who want to live close to Wrexham Town centre. The site is therefore extremely sustainable with the centre easily walkable. The bus station is on this side of the centre and there are footpath links to the railway station. There are areas of green open space on both sides of Rhosddu Road close to the site.

No objective evidence has been put forward as to why the use would cause any harm to the amenities of the area. It fully supports WG's objective of reducing the need for private car usage.

The inspector is requested to grant permission.

Robert A Dewey BA(hons) MBA MRTPI
Bobdeweyplanning

January 14 2019 rev 1

Planning Policy Wales

Edition 10 | December 2018

4.1 Transport^{16 17}

4.1.1 The planning system should enable people to access jobs and services through shorter, more efficient and sustainable journeys, by walking, cycling and public transport. By influencing the location, scale, density, mix of uses and design of new development, the planning system can improve choice in transport and secure accessibility in a way which supports sustainable development, increases physical activity, improves health and helps to tackle the causes of climate change and airborne pollution by:

Enabling More Sustainable Travel Choices – measures to increase walking, cycling and public transport, reduce dependency on the car for daily travel;

4.1.8 The Welsh Government is committed to reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. Delivering this objective will make an important contribution to decarbonisation, improving air quality, increasing physical activity, improving the health of the nation and realising the goals of the Well-being of Future Generations Act.

4.1.9 The planning system has a key role to play in reducing the need to travel and supporting sustainable transport, by facilitating developments which:

are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car

4.1.30 Planning authorities must support active travel by ensuring new development is fully accessible by walking and cycling. The aim should be to create walkable neighbourhoods, where a range of facilities are within walking distance of most residents, and the streets are safe, comfortable and enjoyable to walk and cycle.

4.1.31 Planning authorities must ensure new housing, jobs, shopping, leisure and services are highly accessible by walking and cycling. The design of development proposals should, in accordance with the sustainable transport hierarchy, start with identifying the shortest, most attractive walking and cycling connections and then addressing the other transport needs. Further guidance on this is contained within Manual for Streets and the Active Travel Design Guidance.

4.1.51 A design-led approach to the provision of car parking should be taken, which ensures an appropriate level of car parking is integrated in a way which does not dominate the development. Parking provision should be informed by the local context, including public transport accessibility, urban design principles and the objective of reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. Planning authorities must support schemes which keep parking levels down, especially off-street parking, when well designed.

APPENDIX

RELEVANT EXTRACTS FROM POLICIES

Wrexham Unitary Development Plan policies

Parking

Policy T8 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

Policy H4 The sub-division of existing dwellings will only be permitted where:-

- a)** sub-division is possible without major alterations, extensions, or additional new buildings which would significantly alter the character of the original dwelling; and
 - b)** proposals accord with Policy GDP1;
- and
- c)** adequate private open space is available.
 - d)** the proposal would not result in the over-concentration of Houses in Multiple Occupation to the detriment of crime levels, the social fabric of the area, and the amenity of existing residents.

New homes can also be created from the conversion of redundant buildings and the sub-division of larger residences. There is a significant number of vacant and underused properties in the County Borough. Conversion and sub-division has contributed an annual average of 42 new homes over the last nine years to satisfy an increasing demand for smaller accommodation. Conversion may provide much needed smaller accommodation more quickly and cheaply than would the provision of new homes and, at the same time, ensure a satisfactory re-use of existing resources and supplement conservation policies. Similarly, the sympathetic conversion of redundant non-residential buildings to housing accommodation will be encouraged, providing that basic design standards can be achieved and it can be proven that the agricultural use has ceased and alternative non-residential uses have proved inappropriate. In this way buildings of historic or architectural interest, often set in landscaped grounds of considerable interest, can be saved thereby also helping to achieve the Plan's environmental strategy. Any conversion in the countryside must be sympathetically designed in order to safeguard the existing settlement pattern and the local historic, wildlife and landscape character, and conditions may be attached to restrict permitted development rights. Policy H4 only applies to proposals which require planning permission for the sub-division of existing dwellings. Planning controls only cover certain types of "Houses in Multiple Occupation", and the policy does not therefore apply to all HMO developments. Planning permission for the conversion of a non-residential property in the countryside will not be granted unless the building is of domestic scale and constructed of permanent materials, such as stone, brick, slate or tiles.

Wrexham Local Development Plan

2013 - 2028

Deposit Plan (March 2018)

Policy T1: Managing Transport Impacts

Proposals for new development will be supported where they:

- i. Facilitate increased journeys by more sustainable modes of travel first by walking and cycling, then by public transport and finally by private motor vehicle;

Survey undertaken by appellant's agent autumn 2016.

Licenced HMO's in Wrexham			318
HMO's out of town			33
HMO's in town			285
QTY in town HMO's car parking info gathered			92
			32%
Bedrooms			516
Student Houses			47
No of Students			246
Cars			29
Car Ownership %			12%
Non Student Houses			45
Tenants			270
Cars			27
Car Ownership %			10%

There are 318 HMO Properties in Wrexham and the outlying area.

COUNCIL SURVEY

Appendix 4: Parking Survey Parking Survey (Emails sent 27 April and 8 May 2018)

HMO Size	0 cars	1 car	2 cars	3 cars	4 cars	5 cars	Motor cycles
3 bedroom		5		1		1	
4 bedroom		17		4		1	
5 bedroom			12		13		
6 bedroom	5	7	5		3	1	4
7 bedroom			1		2		
8 bedroom				2			
9 bedroom				1			
14 bedroom				1			
21 bedroom				1			
Total	41	29	7	3	2	1	4
<3 tenants				3			
3 tenants		5		1		1	
4 tenants		17		3		1	
5 tenants	9		15	2	1		1
6 tenants	4	5	4		2	1	2
7 tenants			2		1		
8 tenants			1		2		
9 tenants			1		1		
11 tenants				1			
17 tenants				1			
Total	40	29	8	3	2	1	4

Highest Number of Cars for C4 HMO: 4 cars – one 6 bedroom property with 6 tenants.
Maximum C4 demand – 1 space every 1.5 bedroom/bed space