

From: [REDACTED]
To: [Wales](#)
Subject: FW: H6955/A/16/3160172-Planning Inspectorate
Date: 23 November 2016 20:36:18

TOWN & COUNTRY PLANNING ACT 1990
SECTION 78 APPEAL
Conversion from Residential (C3) to (C4) House in Multiple Occupation
at 62 Alexandra Road, Wrexham
Planning Reference:P/2016/0754
PINS REF:3160172

Dear Sir/ Madam,

It goes without saying that profit driven private rented sector landlords, who specialise in the HMO sector, will always attempt to maximise their profit margin by attempting to use low cost terraced accommodation (which is relatively plentiful in Wrexham) for occupancy by the maximum numbers of adults whilst meeting the minimum housing standards legislation demands.

The rent for a typical 3 bedroom terraced property in Wrexham is circa £600pm, whereas a similar property can raise £1387pm if occupied by four adults (£80pw x 52wks x 4 adults / 12 months). Whilst the landlord will incur overheads for running a HMO, such as rates, heating & lighting, licensing fees etc there is clearly a greater profit margin to be made.

Landlords of such properties can also issue HMO agreements with their tenants on a license basis, which permit tenants to be evicted at the whim of the landlord and at short notice.

As such HMO's do little to provide secure tenancy or a peaceful environment if three or more unrelated individuals are expected to live in the confines of a terraced property.

I am saddened to recently learn there is no obligation placed on HMO Landlords to sound-proof their business property so as to best protect the neighbours quality of life. Whilst there are no guarantees that a family occupied terrace house would not cause a noise nuisance, I would suggest the probability of such an outcome is multiplied by HMO occupants.

Whilst Wrexham has a modestly sized University, which generates demand for a number of HMO's, I would argue that the majority of HMO's in Wrexham town-centre wards are not occupied by students or young professional people but by males who are on low income or Job Seekers Allowance.

Whilst I would not wish to label all HMO occupants as being in this socio-economic group the reality is many are. As such if they have a drug/alcohol issue then their behaviour is understandably alien (eg nocturnal) to the lives of traditional occupants of terraced property. As such a child's bedroom can be expected to share a party wall with a bed-sit occupied by a single male who will generate noise levels in excess of what could be expected to be generated by a traditional occupant.

To quantify the drug/alcohol issue in Wrexham I can confirm that a Wrexham town-centre Tier 2 support agency for individuals with alcohol/ drug dependency issues has recently informed me that they have made contact with in excess of 450 individuals. The recently completed local Welsh Government homeless count highlighted approximately fifty individuals living on the street or in Hostels, so I would maintain that the difference in numbers is made of individuals living in alternative accommodation ie HMO's.

At a Victoria Road Residents Group meeting (which cover Alexandra Road dwellings) held two years ago, which was attended by the then North Wales Police and Crime Commissioner Winston Rodderick QC, residents were left in no uncertain terms that the PCC's priority was to catch the "large fish" rather than spending police resources dealing with the reported occurrence of daily drug dealing on the streets, in full view of residents.

I would therefore argue that the proliferation of HMO's in a community will do little to bond that community. For this reason some residents are calling it a day and are moving out.

In this case I would argue that planning regulations ought to be used to define the trigger point on HMO concentration in this case and for you to uphold WCBC's planning committee's decision to refuse planning consent.

For the record I am not against all HMO applications and each needs to be judged on its own merit. If a HMO application for instance relates to a detached property and offers accommodation which avoids over-crowding thereby placing the tenants interests at the fore, then such applications ought to be looked at more favourably.

Yours faithfully
Cllr Phil Wynn
Brynyffynnon WCBC town-centre ward

Home address - 6, Court Road, Wrexham, LL 13 7RH

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