



Oaklands
Bath Road
Wrexham
LL147PN

14 February 2017

The Planning Inspectorate
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ



Dear Sir/Madam,

Appeal Reference: APP/H6955/A/17/3166742

LPA Reference: P/2016/0783

Property address: 86 Erddig Road, Wrexham, LL13 7DP

We shall confine our comments to the appellants' agent statement accompanying the appeal. The agent's individual assertions in that statement are in *italics*.

1. The site

'the streets are of restricted widths...traffic flows limited to access to properties....not generally used as distributor roads.'

It is true that the streets are extremely narrow, but the comment on traffic flows is pure supposition. Only a resident can make an informed statement about traffic flows and one resident is able to do precisely that.

Firstly, you need to be aware that 86 Erddig Road stands in the middle of a triangular area, with 3 schools located at each corner: Saint Joseph's Secondary School is 180 metres away to the south, and St Giles Primary School is the same distance away to the north east. Victoria Primary School is approximately 250 metres away to the north west. (Please refer to the enclosed map).

Footage from a resident's CCTV cameras has recorded average traffic flows of 60-70 vehicles on Erddig and Bath roads between 8am and 9am, and 75% of this traffic occurs in the half hour period prior to school registration at 9am. When pupils exit the schools at 3-15pm, an average of between 55 and 60 vehicles use the same roads during a half hour period to 3-45pm. During the same periods in the morning and afternoon, the roads are used extensively by pupil and parent pedestrians making their way to, and from these schools.

Erddig Road and Bath Road are perceived as fairly quiet through routes for pupils and parents on foot, and by car owners as 'short cuts' to the schools and other areas because of traffic congestion on the A5152 (Ruabon Road) into the town centre, and on the

B5100 (Fairy Road) at a specific traffic roundabout 'pinch-point' where the B5100 meets the A5152.

St Giles School has limited parking for vehicles outside the school gates, and many parents have discovered they can use Bath Road and Erddig Road to access Fairfield Street, where they can easily park and walk less than 50 metres to St Giles school entrance on Poplar Road (the map refers).

The speed limit is 30 mph on all the roads concerned, but this limit is frequently exceeded on Erddig Road and Bath Road. There are no traffic calming measures on any of the roads.

2. Conservation Area

'The proposal is intended to increase the viability....could harm the Conservation Area.'

The appellants did not buy 86 Erddig Road because they wanted to live in a unique Wrexham conservation area, but because they sought to obtain a generous return on their investment in a rental property. There are currently 3 HMO's – which are quasi-businesses, - within 30 metres of each other in this beautiful conservation area. 86 Erddig Road was a family property before the appellants purchased it, and there is no reason why it should not be again. It would certainly accommodate 2 luxury apartments.

Investment in property - other than for owner-occupancy - is speculative, and carries with it certain risks for the landlords in terms of tenant occupancy levels, which are crucial to profit levels in these property businesses. It is surely not the function of planning to mitigate those financial risks by allowing new development that has a material impact on residents' amenity, simply to improve the financial viability of a particular property. 'Viable' is a term not normally relevant in connection with a family home.

3. Assessment

- a) *'The property has no off-street parking spaces....would not allow sufficient space to park outside the property.'*

Many of the nearby properties - in Erddig Road to the north of the Bath Road/Sontley Road junction - are indeed not able to park outside their property, but home owners choose to live here because of the unique attractiveness of the conservation area and in the knowledge that they **should** be able to find a parking space lower down Erddig Road and in Bath Road. This was certainly the case before 3 former family homes were converted to HMO's. Family homes rarely own more than 2 cars and many have only 1 vehicle.

Being able to park your vehicle close to your home after visiting the supermarket on a rain-soaked winter evening is THE most important amenity to local residents.

The parking congestion is most acute in the evenings and at weekends, when home owners often struggle to find a space. This becomes extremely problematic for visiting friends and family.

Prior to the appellants purchasing the property, it was a 1 car family home. With the student condition imposed, there were never more than 2 cars that belonged to the student occupants. If the conditions are lifted, it is perfectly feasible that 8 non-student occupants could each own a car. **And the appellants also own an HMO (Carlton Villas) licenced for tenants (not students), 20 metres away on Sontley Road.**

- b) *'Whereas there is no evidence...any survey of the actual situation, the appellant has done.'*

The appellants' 'survey' is statistically flawed and the main conclusion drawn is therefore incorrect.

The appellants contend that 12 % of student occupants in HMO's own a car. A 2014 student lifestyle tracker report commissioned by the National Union of Students Services and Endsleigh Insurance found that slightly less than 25% have their own car. This percentage figure is borne out by the students formerly occupying the appellants' property: we have never seen more than 2 cars parked outside during the time it has been occupied by students.

The appellants' figures on student car ownership are therefore **understated**, but with the true figure lying between 12% or 25%, it proves that the conditions imposed by the Borough Council were specifically, and reasonably imposed, to limit occupant car ownership in the interests of highway safety due to lack of off-street parking.

The appellants' second contention, that non-student car ownership is 10% of rented property occupants, is disproved by the current **non-student** occupants of the appellants' property. There are 4 vehicles parked on Erddig and Bath Road that belong to tenants of 86 Erddig Road, and the current occupancy level is unknown.

- c) *'...public transport is available nearby.....walking distance of the town centre would encourage reduced reliance on the car.'*

All the reasons given by the appellants' agent for discouraging car use are applicable to non-car owners and **students in particular**, and that further endorses the conditions imposed. Wrexham is the home of Glyndwr University, which actively encourages its students to leave the car at home and use public transport wherever possible. All UK universities are aware of the ecological impact of allowing students to bring their own cars, as they obviously don't want to encourage an increase in traffic and pollution levels in their area. Not only does this have a negative effect on the environment, but it also creates a bad perception of the institution and angers local communities because of the excessive number of vehicles.

The planning committee councillors were well aware that Glyndwr University discourages students to bring their cars with them. This fact, coupled with the knowledge of low car ownership among the general student population, is absolute justification for the condition imposed. It also explains why in a student-only occupied property (Condition 2 of the planning permission), the 4 parking spaces are more than adequate.

4. Other Comments

'There is a strong demand for non-students...more varied...surely enhance its suitability for fitting in with the community.'

This statement is perfectly true and no local resident would take issue with it, but it is the unintended consequences of this strong demand that are having an adverse impact on the residents' local amenity and well-being.

The Wrexham Local Development Plan 2013-2028 records that there has been a substantial change in the demographic profile in the town between 2003 and 2013. Migration from the A8 countries admitted to the EU in 2004 has been the main driver of population growth in Wrexham, and will continue to be so for the next 10 years. Projected migration to Wrexham in that period is 950 per year.

Prior to these rapid and substantial changes in the demographic, many rented houses were typically occupied either by students, or mainly by young lower-income single people, including vulnerable and disadvantaged people, many of whom could not afford to run a car. This profile has changed markedly in the past 10 years, and accounts for a substantial growth in HMO's, which are seen by investors to have a higher income-generating potential than ordinary buy-to-let properties

The salient point is: much of this population increase is **employment-led.**

Mr Howell acts in a professional capacity for several migrants from Eastern Europe. They are hard-workers and are here to better themselves. They add value to the local community and economy of the area. But without exception they live in rented accommodation and are all car owners, either because they are local taxi or van delivery drivers, or because they have employment on the local industrial estate, or in factories and businesses on the outskirts of the town.

They are fiercely independent, and bus and train routes are of no consequence to them. Many live in the area and do indeed find it an advantage to be able to walk into town and centres of local entertainment, **but they leave their cars parked outside their rental accommodation.**

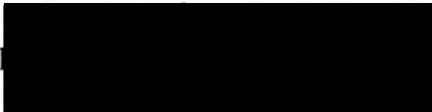
A short walk in any direction from Erddig and Bath Roads will reveal many roads clogged with cars: a direct consequence of the proliferation in numbers of HMO's in the area that **are not limited to student occupation only.**

We trust you will agree that there is no substitute for representations from local residents, who have first hand, day to day knowledge of the area, and are best placed to provide evidence of a development's potential adverse impact on the amenity and well-being of the community.

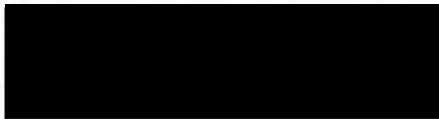
We hope that your site visit and resident's written representations will convince you to refuse the appeal.

Yours faithfully,

Mr P. R. Howell



Mrs B. J. Howell





Fairy Road Conservation Area

Designated: 29/08/75

Amended: 01/12/97

Article 4 (2) Direction Designated: 07/05/98

Character Assessment Adopted: 07/09/98

Scale 1:5000

24 February 2010

