PLANNING STATEMENT

36 Brook Street, Wrexham

Change of Use from Three-Bedroom Dwellinghouse (Use Class C3) to Three-Bedroom House in Multiple Occupation (Use Class C4) with Maximum Occupancy of Four Persons

1. Introduction

This Planning Statement has been prepared in support of an application for the change of use of the upper floors at 36 Brook Street, Wrexham from an existing three-bedroom dwellinghouse (Use Class C3) to a three-bedroom House in Multiple Occupation (Use Class C4).

The proposed HMO will comprise three letting bedrooms and will accommodate a maximum of four residents.

The proposal relates solely to the change of use of the existing residential accommodation. No extensions, external alterations, structural works or increases in floorspace are proposed.

The maximum occupancy level of four persons ensures that the development does not result in a material intensification of residential use when compared with the existing lawful use of the property as a three-bedroom dwellinghouse.

This statement assesses the proposal against the relevant policies of the Wrexham Unitary Development Plan, namely Policies H4, GDP1, EC6 and T8, together with Local Planning Guidance Note 5: Houses in Multiple Occupation.

2. Site and Surroundings

The application property is located at 36 Brook Street, Wrexham, within an established urban and town-centre location.

The property forms part of an existing building with residential accommodation at upper-floor level. The surrounding area is characterised by a mixture of residential, commercial, retail and service uses.

The site is within walking distance of local shops, services, public transport facilities, employment opportunities and public open spaces.

3. Principle of Development

The proposal retains the existing residential use of the upper-floor accommodation and provides an alternative form of housing within the existing building.

The development does not result in the loss of residential accommodation. Instead, it provides a small-scale HMO within an established and sustainable urban location.

The proposal makes efficient use of existing residential accommodation, avoids the need for new built development and contributes towards local housing choice.

The principle of the development is therefore considered acceptable, subject to detailed assessment against the relevant UDP policies and LPGN 5.

4. Policy H4 – Subdivision of Dwellings

Policy H4 states that the subdivision of existing dwellings will only be permitted where the subdivision can be achieved without major alterations, extensions or additional buildings that would significantly alter the character of the original dwelling; where the proposal accords with Policy GDP1; where adequate private open space is available; and where the proposal would not result in an over-concentration of Houses in Multiple Occupation to the detriment of crime levels, the social fabric of the area or the amenity of existing residents.

The proposal accords with Policy H4 for the following reasons.

Firstly, the proposal does not involve any major alterations, extensions or additional buildings. The external appearance and built form of the property will remain unchanged.

Secondly, the proposal accords with Policy GDP1, as set out later in this statement.

Thirdly, the proposal relates to an existing upper-floor town-centre dwelling. The existing property does not benefit from private outdoor amenity space and the proposal does not worsen the existing situation. The site is located within a highly accessible town-centre location where occupants have convenient access to public open space, services and facilities.

Fourthly, the proposal would not result in an unacceptable concentration of HMOs. A review of available HMO licensing information has been undertaken and the proposal is not considered to give rise to an over-concentration of HMOs within the locality.

The development is therefore considered to accord with Policy H4.

5. Policy GDP1 – Development Objectives

Policy GDP1 requires new development to be appropriate in terms of scale, design, layout, access, amenity, safety, environmental impact and relationship to public transport, pedestrian and cycle routes.

The proposal is compliant with Policy GDP1 for the following reasons:

- No external alterations are proposed.
- The scale, form and appearance of the existing building will remain unchanged.
- The proposal retains a residential use within an existing residential unit.
- The development does not increase the number of bedrooms.
- The development does not increase the residential floorspace.
- Occupancy will be limited to a maximum of four residents.
- The proposal will not cause unacceptable noise, disturbance, loss of privacy, overlooking or overbearing impact.
- The site is located in a highly accessible town-centre location with convenient access to local services, public transport, pedestrian routes and cycling opportunities.
- Refuse and recycling storage will be provided to the rear of the building and identified on the accompanying block plan.
- The proposal represents the efficient re-use of an existing building and supports sustainable development.

The proposal is therefore considered compliant with Policy GDP1.

6. Policy EC6 – Biodiversity Conservation

Policy EC6 relates to biodiversity conservation and seeks to ensure that development does not cause unacceptable harm to sites or features of biodiversity interest. It also supports measures that improve biodiversity value and enhance nature conservation interest.

The application relates solely to the change of use of existing residential accommodation. No external works, extensions, demolition, vegetation clearance, tree removal, ground disturbance or changes to the site footprint are proposed.

The proposal will therefore have no adverse impact upon existing biodiversity interests.

A separate Green Infrastructure Statement and Net Biodiversity Benefit scheme will be submitted in support of the application. This will include proportionate biodiversity enhancement measures comprising one bird nesting box and one bat box, to be installed on the building and retained for the lifetime of the development.

The proposal is therefore considered acceptable having regard to Policy EC6.

7. LPGN 5 – Houses in Multiple Occupation

Local Planning Guidance Note 5 sets out how the Council assesses proposals for Houses in Multiple Occupation. It is a material consideration in the determination of planning applications and provides guidance on HMO concentration, amenity, parking, outdoor space, bin storage and licensing matters.

7.1 HMO Type and Occupancy

The proposed development is a small HMO within Use Class C4.

The property will comprise three letting bedrooms and will accommodate a maximum of four residents.

The maximum occupancy of four persons will be secured through the submitted application details and can be controlled by planning condition if considered necessary by the Local Planning Authority.

The proposal therefore represents a small-scale HMO and not a large Sui Generis HMO.

7.2 Occupancy and Residential Intensity

The existing lawful use of the property is a three-bedroom dwellinghouse.

The proposal does not increase the number of bedrooms, does not increase the amount of residential floorspace and does not involve any extension or physical enlargement of the building.

The proposed HMO will be restricted to a maximum occupancy of four persons. This ensures that the level of occupation remains comparable to that of the existing three-bedroom dwellinghouse.

The development therefore represents a change in the nature of occupation rather than a material intensification of residential use.

7.3 Concentration of HMOs

LPGN 5 seeks to avoid over-concentrations of HMOs. It indicates that proposals should not normally result in the number of residential buildings in use as HMOs exceeding 10% within a 50-metre radius of the application site. It also normally requires a gap of at least two dwellings or other buildings not in HMO use between a proposed HMO and any existing HMO.

A review of available HMO licensing information has been undertaken.

Based on the available information, the proposal would not result in an unacceptable concentration of HMOs within the surrounding area. The development would therefore maintain a balanced and sustainable local community and would not harm the social fabric of the area.

The proposal is therefore considered compliant with the concentration objectives of LPGN 5.

7.4 Extensions and Alterations

No extensions or external alterations are proposed.

The character and appearance of the building and the wider street scene will remain unchanged.

The proposal therefore raises no adverse design, visual amenity, daylight, privacy or overbearing impacts.

7.5 Residential Amenity

The property is already in residential use.

Given the modest scale of the proposed HMO and the restriction to a maximum occupancy of four residents, the development is not expected to generate any significant increase in activity, noise, disturbance, vehicle movements or waste generation beyond that associated with the existing lawful residential use.

The proposal will therefore preserve the amenity of neighbouring occupiers.

7.6 Private Amenity Space

The property occupies upper-floor accommodation within Wrexham Town Centre and does not currently benefit from dedicated private outdoor amenity space.

The proposal does not alter the existing situation and does not reduce any existing amenity provision.

The application site is located within a sustainable town-centre location with convenient access to public open spaces, services, shops, employment opportunities and public transport facilities.

Given the existing nature of the property, the absence of external alterations, the small scale of the HMO and the maximum occupancy restriction of four persons, the proposal is considered acceptable in this regard.

7.7 Bin Storage and Waste Management

A dedicated refuse and recycling storage area is available to the rear of the building.

The proposed bin storage area will be identified on the accompanying block plan.

Refuse and recycling will be stored within suitable containers in accordance with Wrexham County Borough Council requirements. The storage area will be available to all residents and managed through the tenancy and property management arrangements.

Waste will be presented for collection in accordance with the Council's normal kerbside collection arrangements.

The proposal therefore provides suitable refuse and recycling storage in accordance with LPGN 5.

7.8 HMO Licensing

The applicant acknowledges that HMO licensing requirements are separate from planning permission.

Where required, the property will be subject to the appropriate HMO licensing regime, including requirements relating to management, safety, physical standards and maximum occupancy.

8. Policy T8 – Parking

Policy T8 requires development to provide vehicle parking either on site or nearby in accordance with the Council's current parking standards. Regard is to be given to the availability of public transport, proximity to public parking, proximity to local services and facilities, and any road safety or amenity issues arising from on-street parking.

The application site is located within Wrexham Town Centre, where there is excellent access to shops, services, employment opportunities and public transport.

The proposal does not increase the number of bedrooms and occupancy will be restricted to a maximum of four residents. As such, the development is not expected to generate a material increase in parking demand when compared with the existing lawful use as a three-bedroom dwellinghouse.

The proposal does not create any new access or highway safety issue.

Given the sustainable town-centre location, the availability of nearby services and transport options, and the absence of any material intensification of residential use, the proposal is considered acceptable having regard to Policy T8.

9. Phosphate Neutrality

The application relates to the change of use of an existing three-bedroom dwellinghouse to a three-bedroom House in Multiple Occupation.

The proposal does not increase the number of bedrooms, residential floorspace or overnight accommodation available at the site.

Occupancy of the HMO will be limited to a maximum of four residents.

As the proposal does not materially increase the residential capacity of the property, it would not be expected to generate a material increase in foul water discharge when compared with the existing lawful use.

Accordingly, the development would not give rise to any additional phosphate loading within the River Dee Special Area of Conservation catchment and is therefore considered phosphate neutral.

10. Conclusion

The proposal seeks planning permission for the change of use of an existing three-bedroom dwellinghouse to a three-bedroom House in Multiple Occupation accommodating a maximum of four residents.

The development represents a small-scale and sustainable re-use of existing residential accommodation within a highly accessible town-centre location.

The proposal:

- Retains residential use of the property;
- Provides a small HMO within Use Class C4;
- Limits occupancy to a maximum of four residents;
- Does not increase the number of bedrooms;
- Does not increase residential floorspace;
- Does not involve any external alterations or extensions;
- Does not result in a material intensification of residential use;
- Does not result in an unacceptable concentration of HMOs;
- Preserves neighbouring residential amenity;
- Provides appropriate refuse and recycling storage arrangements;
- Is acceptable in parking and accessibility terms;
- Causes no harm to biodiversity interests;
- Will be supported by proportionate biodiversity enhancements; and
- Is phosphate neutral.

Accordingly, the proposal accords with Policies H4, GDP1, EC6 and T8 of the Wrexham Unitary Development Plan, together with Local Planning Guidance Note 5: Houses in Multiple Occupation, and should therefore be approved.