MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO::	Nick Atkinson
Our Ref:	ET/DC/MZ/P/2024/1387	**Your Ref:**	P/2024/1387
Date:	02/12/2024		

TOWN AND COUNTRY PLANNING ACT 1990

PROPOSAL: CAIS AMLINELLOL AR GYFER CODI 33 ANNEDD (CADW YMDDANGOSIAD, TIRLUNIO A GRADDFA) / OUTLINE APPLICATION FOR ERECTION OF 33 DWELLINGS (APPEARANCE, LANDSCAPING AND SCALE RESERVED)

LOCATION: LAND AT BETHANIA ROAD, BETHANIA ROAD, ACREFAIR, WREXHAM

I refer to your consultation / email dated 17/09/2024 in respect of the above.

It is the LHA's understanding that the proposals are for outline permission for the erection of 33 dwellings with appearance, landscaping and scale reserved. As such the LHA's comments will focus on the proposed access arrangements, however the LHA will also make advisory recommendations in relation to layout and parking provision.

Trip Generation

The applicants transport consultant Paragon has put together a Transport Statement to detail and provide information in relation to the highways implications of the proposals. It appears that the TS was drafted in 2021 for a previous application on the site and as such the TRICS data as part of the submission is a little dated. The TRICS good practice guide states that surveys should have been taken during the last 8 years, whereas many were undertaken prior to 2016. Furthermore there is a survey undertaken in Ireland that should have been omitted from the data.

Nevertheless, it is considered that the trip rates and generation associated with the development is relatively modest and the previous assessment of 17 two-way trips in the peak hours is likely to be reasonable on the basis of a site with upto 33 number dwellings.

Access Arrangements

Bethania Road is narrow in nature and has extensive lengths without footways which makes journeys on foot less safe. It currently has a speed limit of 20mph which means that visibility splays of 2.4m x 25m are required at all access points to ensure that adequate visibility is maintained to ensure highway safety is not compromised. The submitted revised site plan indicates two access points off Bethania Road, a main access point to a new access road that is proposed to be 5.5m wide with 2 x 2m wide footways and an access to three dwelling houses located further east of the main access at the extreme east of the site. Whilst the LHA has scaled off the plan and can confirm

the required visibility splay is available for the main access road and looks to be contained. There is insufficient information within the submission in regards to the easternmost access point. The LHA requests that the applicant provides additional information to demonstrate that the provision of 2.4m x 25m visibility splays are available from the access with nothing higher than 0.6m within the splay. Visibility splays must be provided within land that the applicant controls or within the public highway.

The submitted plan does not have a scale detailed, can the applicant ensure that all submitted plans are provided with a scale in future. The submitted plan appears to be 1:200 and therefore it appears that a 2m wide footway is proposed along the site frontage, dropped kerbs and tactile paving should also be provided across the proposed new site access junction, these works should form part of a Section 278 agreement.

No surface water from the applicant's site should be allowed to drain onto the public highway and therefore the provision of an aco drain may be appropriate on the shared private drive proposed.

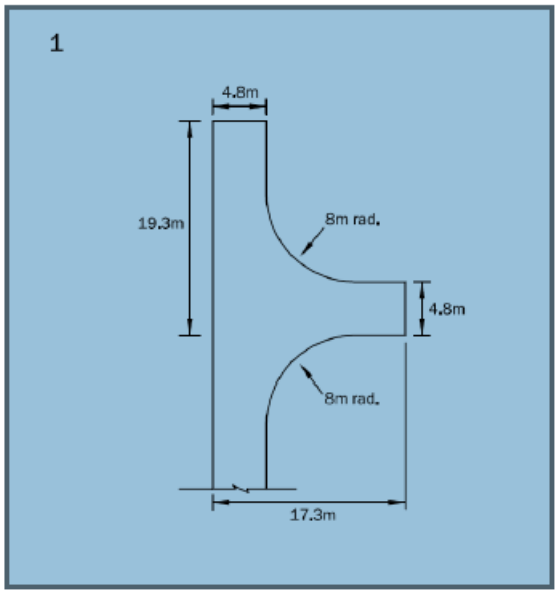
The first 5m minimum of the shared private driveway should be hard paved, to avoid gravel or loose chippings from spreading onto the Public Highway or footways within the vicinity of the site.

New access road and turning head

It is noted that a new access road is proposed to be installed as part of the proposals, the proposed highway is stated to be 5.5m wide and with 2 x 2m wide footways, which is acceptable in principle. In order for the access road to be adopted it will need to be designed to Highway adoptable standards with adequate drainage, kerbing and surfacing with street lights that meet the Councils specification for adoptable highways. The WCBC active travel officer would recommend the installation of dutch kerbs to ensure that transitions between full height and dropped kerbs are swift.

Swept paths should be submitted within the reserved matters application to ensure that the Councils waste management vehicle can turn within the site.

The minimum turning head required by the Council is shown in the drawing below. The indicative plan appears to comply with these requirements.



Active Travel

Bethania Road forms part of a planned Wrexham Active Travel Network route Wrex-Cefn-SUP0012. It is planned to upgrade the route to provide improved facilities for pedestrians and cyclists. The form this will take is unsure at the moment, however, it may be that Bethania Road becomes one way, and a contra-flow cycle is installed alongside improved pedestrian paths.

Therefore the LHA would request that should the LPA be minded to grant the application, that a Section 106 contribution towards these future works should be provided by the developer.

Furthermore, the provision of a shared cycle / footway of 3m width on Bethania Road along the site frontage would be welcomed to ensure that adequate facilities are provided along the site frontage.

Whilst the addition of a link to Footpath 71 in the Highways Technical Note is a valuable addition for walking, it is considered that the route as it is, may not be an attractive prospect due to the route through woodland and potentially uneven surfaces, the improvement of this route would provide valuable access to the public transport stops on Llangollen Road. It is noted within the Highway Technical note that a pedestrian link from the development to Llangollen Road is proposed utilising the existing public right of way. The applicant has stated that this would be at least 2m wide and would contain a hardened and sealed surface within the limits of the development site. Whilst the LHA welcomes this access route further information is required in regards to the levels and gradient of the proposed route, the accessibility of the route should be considered carefully. It also is not clear if the proposed element of footway is within the site edged red. The applicant has stated that they proposed to improve the existing footpath 71 and that the level of improvements would be agreed with the Councils PROW officer and would include an improved compacted stone surface and low-level lighting if considered to be appropriate by the Council. The LHA would welcome the lighting of both elements of the pedestrian route proposed. The proposals should be secured by S106 agreement and the LPA should ensure the footway link proposals are within the site edged red.

It is noted that the pedestrian link shown from the site in Appendix A of the Highways Note is not shown on the indicative site layout plan submitted, the applicant should provide this link to the PROW and ensure that the driveways for plots 23 and 24 only reverse over the centre area of the turning head, to ensure they do not have to reverse over extensive lengths of footway.

Whilst the existing infrastructure on Bethania Road for pedestrians and cycling is limited, it must be noted that there was a previous appeal on the site and the inspector ruled that whilst the lack of a continuous footway could discourage residents from walking to nearby facilities, that they witnessed pedestrians seeking refuge on paved areas outside the flow of traffic successfully and did not uphold the dismissal on pedestrian safety grounds.

Construction

A condition for a construction management plan (CMTP) should be secured to ensure that roads in the vicinity of the site are kept clean of construction materials, mud and detritus and that adequate provisions are made for staff parking /travel arrangements to ensure that construction on the site doesn't cause overflow parking on Bethania Road to the detriment of highway safety and accessibility.

Site Layout

Whilst these matters are only indicative at this stage and further details will be submitted at reserved matters stage, the LHA would recommend that the parking standards set out in LPG16 are meant to discourage any overflow parking from resulting on Bethania Road. The submitted design provides 2 car parking spaces per 3 or 4 bedroom dwelling, and there is concern that in this location and with the design proposed that this could result in overflow or obstructive parking on pavements and roads within the site and on Bethania Road which could restrict access for refuse and emergency vehicles.

Swept paths for a large car would be required for the private drive proposed off Bethania Road and an adequate turning head should be provided within the private drive.

The LHA would also recommend against long lengths of dropped kerb which provides little scope for parking on street within the proposed access road.

Pedestrian paths should be considered carefully and should not be blocked by parking spaces or parked cars. Refuse stores and cycle parking should also be considered carefully. The terraced houses proposed don't all appear to have rear access to their gardens to provide access for cycle parking and bin storage which needs to be addressed.

The shadows on the drawing make it very difficult to review from a highways perspective and therefore the LHA recommends at reserved matters stage that a drawing without shadows is provided.

LPG16 states that for 3 or 4 bedroom dwellinghouses 3 car parking spaces should be provided per unit and that driveways should be wide enough to allow pedestrian access alongside parked cars (including wheelchair access). Garages will not be counted as contributing towards on-site parking provision. The applicant states they are proposing two car parking spaces per each dwelling but that doesn't appear to be the case based on the drawing submitted, Plots 8-11 do not have parking provided at the stated 2 per dwelling.

Electric vehicle charging points would be welcomed for all dwellings.

Sufficient space to provide at least 2 secure cycle parking spaces per dwelling should be provided, if no garages are provided an accessible route should be provided to the rear garden of each dwelling for cycle storage.

The LHA would state that despite the layout of the site not forming part of the consideration of this application that the site appears very cramped and accessibility would be improved by reducing the number of units on site and increasing the available space for residents parking on plot and on street for visitor parking. The LHA feels it is imperative to ensure that the development does not create overflow parking on Bethania Road that could compromise highway and pedestrian safety.

Conclusion

Whilst there are no objections in principle to the development, the provision of a revised access arrangement / visibility splays is required for the private driveway accessing plots 1-3. Visibility splays of 2.4m x 25m are required in either direction to the nearside kerbline on land under the applicants control or on the public highway.

Clarification and further details are required in relation to pedestrian access to the site linking to the Public Right of Way, this path needs to be shown on the submitted plans and needs to be within the site edged red.



on behalf of Chief Officer, Environment & Technical

Supplementary Notes

The applicant's attention should be drawn to item nos. 1, 2, 3, 4 & 5 of the supplementary notes.

Appendix

Highways Development Control Standard Advisory Note

In the interests of maintaining highway safety, and to avoid obstruction of the public highway (in contravention of the Highways Act), The Applicant is advised to coordinate with the highway

authority at highwayroadworks@wrexham.gov.uk in advance of commencement of the development/works with respect to:

1. *Skip, scaffolding, hoarding or A frame/signage (Permit required for these items, if on the public highway);*
2. *Use of a parking space for a set down/delivery area;*
3. *Record a dilapidation survey of the adjacent carriageway prior to commencement (to avoid being ask to repair damage by the Applicant whilst carrying out their works);*
4. *If any lane closure or obstruction of the highway is required for a crane or similar;*
5. *Protection against dust and debris blowing onto the public highway*
6. *Construction traffic parking locally avoiding nuisance to others;*
7. *If the Applicant's scope of work includes new apparatus in the highway, such as new mains services then a Section 50 licence will be required. Insurances and demonstration of competency to carry out works in the public highway will be required.*
8. *Lowering of kerbs or minor pavement alterations require Section 184 agreement. Insurances and demonstration of competency to carry out works in the public highway will be required.*
9. *A section 278 agreement works agreement is required for more significant alterations to the existing highway*
10. *Any temporary works affecting traffic lights, [pedestrian/cycle road crossings, or bus stops require pre-planning and permits;*
11. *For applications with a private driveway (either existing or proposed) connecting onto the public highway, the following conditions of approval apply:*

    - *No surface water from the applicants site should be allowed to drain onto the public highway,*
    - *The first 5m* minimum (for residential property) should be hard paved, avoiding gravel or loose chippings form spreading.*
    - *No gate should be built in a location where it would result in a car obstructing the highway whilst being unlocked, and it should not swing out and over a pavement or any other part of the highway.*

    **The hard paved length and set back if required is subject to the applicants proposed vehicular length*

The applicants should allow a minimum of 4 weeks' notice for any of the above standard requirements, and 6-8 weeks for lane closures & road closures (lead times may change without notice subject to workload and complexity). Any works involving Trunk roads should be coordinated separately and directly with the North & Mid Wales trunk Road Agency. For larger sites with a significant impact upon the highway, a Construction Traffic Management Plan will be required.