

MEMORANDUM



From:	Chief Officer, Environment & Technical Regulatory	To:	Chief Officer Planning &
Our Ref:	ET/DC/MZ/P/2023/0186 Revision 2	Your Ref:	P/2023/0186
Date:	30/01/2025		

**Land Off, St Mary's Avenue, Overton, Wrexham, LL13 0ES
Erection of 45 Dwellings, Associated Access, Landscaping and Supporting Infrastructure**

Further to your additional information submitted in respect of the above application, please see comments as follows: -

The LHA's previous comments set out the requirements for:

- *Turning movements for a refuse vehicle at the internal junction within the site.*

Updated swept paths have been provided across the site, however, for the northern area of the site (not serviced by the welsh water tanker) it would be helpful to see a swept path for a 12m rigid fire tender, apologies for this, the size of this vehicle has only recently come to light.

- *Confirmation of refuse collection arrangements for Plots 11-16 and 43-46 with additional vehicle tracking, if necessary.*

There is concern that the BCP may block visibility from the parking spaces which align next to them in regards to Plots 11-16 and the southernmost bin collection point for plots 45 and 46 seems to be in excess of the standards quoted and the arrangement of the private drive would not seem to lend itself to a refuse vehicle reversing and therefore the design should be amended to be within the remits already quoted, refuse operatives and residents should not need to move a bin more than 15m.

- *Revised vehicle tracking for a 12.25m tanker associated with access to/from the pumping station and modification to the proposed access.*

Revised swept paths have been provided showing that the vehicle can access and service the south of the site acceptably without swinging over the footways, however, so many tracks are overlaid it is difficult to see individual movements, the LHA requests these are provided individually. Whilst it is appreciated that such servicing should be a rare occurrence in extreme conditions, there is concern that should there be any on-street parking along the access route that this vehicle needs to pass by, access may not be possible. There is concern on the access road closest to the site access that lower levels of parking per plot might encourage on-street parking and this is a concern. Swept paths should be provided from School Lane towards and into the site also.

- *Revised plans to include wider footways to the exterior of Plots 17-21 and Plots 41 and 42.*

The footways have been improved across the site and these amendments are welcome.

- *Revised plans to indicate 0.6m service strips where no footway is provided.*

Service strips have been clarified and are mainly located south of unit 33 and run in a southerly direction. A footway is provided to unit 33 and dropped kerbs and tactile paving are provided within the vicinity of the junction to improve access.

- *Confirmation of proposed street lighting*

There has been no street lighting information provided. **This issue has not been addressed.**

- *Clarification of 'focal point' and internal site junction denoted by hatching in drawing PSH06-BET-B-013-C. Clarification on interaction between the focal point feature and the driveway to Plot 33.*

In Revision Q of the drawing clarification has been provided that walls will be no higher than 0.6m.

- *Revised visibility splays accounting for the proposed landscape layout and siting of trees.*

Revised visibility splays have been provided.

- *Revised plans showing the proposed pedestrian link to Public Footpath 17 from the northern boundary of the site and alignment of Public Footpath 18 in relation to the development site.*

Revised plans showing this have been provided. **There are issues with the parking for unit 29 in the vicinity of the site, which require amendment. The LHA would ask the applicant to consider if a turning head is required at this point and if the removal of such would provide more space to realign the footway link.**

- *Justification for the parking shortfall associated with 3-bedroom properties with only two spaces and measures to manage potential overspill parking.*

Whilst some of the house types have changed between rev N and rev Q which means that some of the parking requirements have been fulfilled plots 35-37 are 1 car parking space short of what would be required each. **Whilst two visitor parking spaces are shown, this issue has not fully been addressed and the long lengths of dropped kerbs are not acceptable on pedestrian safety grounds.**

Further to the above, there have been extensive changes to the layout and therefore the LHA can comment as follows:

- Long lengths of dropped kerbs alienate the frontage for overflow or visitor car parking and compromise pedestrian safety. There are numerous examples of 3-4 car parking spaces in a row with a footway behind them, this restricts pedestrian visibility which should be provided for every driveway parking space of 2m x 2m, Manual for Streets states nothing higher than 0.6m incase there is a child passing, each car is higher than 0.6m.
Amendments are required for plots: 20,21,22, 8, 29, 6, 5, 4, 1, 2, 3, 37, 36, 35.
- In the LHA's opinion there are too many parking spaces, driveways and conflict points located within close proximity, priority along these frontages would be with drivers and not pedestrians which does not accord with The Wales Transport Strategy 2021, Manual For Streets or the Active Travel Act Guidance 2021.
- There are concerns over driveway alignments, driveways should be accessed at 90

degrees to the footway to ensure adequate visibility is provided. This still isn't the case for the driveways for units 4, 34, 27, 29, 9, 8, 7, 33, 35, 36,

- Parking provision for units 35-37 falls short of the WCBC standards which states that three car parking spaces should be provided for each three bedroom dwelling, therefore this has the potential to cause overflow parking on the busiest stretch of the site access road. This is a concern as parking onstreet in this area could restrict access to welsh water tankers or emergency vehicles or impede access to driveways.
- WCBC does not accept garages as parking spaces
- Driveway dimensions are required to be 5m wide for double driveways, and 10m length for tandem parking (1 car behind another) or 15m length for three cars (1 behind another). Driveways should also be 0.5m longer if a garage requires to be accessed. The driveway dimensions are short of these standards across the site.
- The refuse arrangements for units 44-46 have been amended, however, still don't comply with WCBC standards, the applicant has clarified that the road is proposed to stay a private drive, but the arrangement is unlikely to be serviced by a refuse vehicle due to the tight arrangement and swept paths demonstrating such have not been provided.
- There is still no clarification on a ped/cycle link through to Clerc-Y-Mendy
- The dropped kerbs for plot 5 are next to the pedestrian dropped kerbs and tactile paving which is dangerous, as is the driveway for plot 33 and the alignment takes drivers back into the path of the pedestrian crossing which isn't acceptable.
- The parking spaces for plot 14 are set outside of the plot, and accessed from the end of the cul-de-sac, it would be difficult to police these parking spaces as they are designed as being publicly accessible. Also three car parking spaces at this location are not acceptable, as it results in reversing over extensive lengths of footway rather than just simply crossing a dropped kerb. These need to be reconsidered, only two car parking spaces in a central arrangement would be accessible from such an arrangement.
- The LHA would question the provision of dropped kerbs and tactile paving in front of plots 25 and 19, the provision of a full width footway across the private car park access would be preferable, as it reduces conflict points. Dropped kerbs and tactile paving arrangements in close proximity to driveways are not recommended.
- There is still concern over the building line of plot 3, a footway has been added but it's not wide enough to make an impact and improve pedestrian visibility, 2m x 2m is required.
- Parking arrangements for plots 1-6, 35-37, 8, 29, 20-22, 24 need an overhaul on pedestrian safety grounds, no pedestrian visibility is available due to extensive lengths of dropped kerbs and long rows of parked vehicles
- Ped paths in front of rows of parking are substandard at just 1m wide, this could create accessibility issues for those visiting units 20-22, 11-15, 35-37.
- Where ped paths are taken from driveways, driveway widths should be 3.1m wide to accommodate this
- The building line of plot 24 overhangs the footway on its south west corner and needs setting back
- An aisle width of 6m is required between the drives for plots 44-46 or the driveways need to be widened to ensure vehicles can start to turn within their space. Swept paths for a large car should be demonstrated.
- The swept path for the 7.5t vehicle on the private drive at the south of the site is acceptable.

In its current form the proposals are not acceptable on highway and pedestrian safety grounds.

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

on behalf of Chief Officer, Environment & Technical