

# MEMORANDUM



---

**From:** Chief Officer, Environment & Technical

**To:** Chief Officer Economy & Planning

**FAO::** Matthew Phillips

**Our Ref:** ET/DC/MZ/P/2023/0186 Revision 3

**Your Ref:** P/2023/0186

**Date:** 08/04/2025

---

**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:

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

There is concern that the southernmost bin collection point for plots 45 and 46 seems to be in excess of the standards quoted and therefore it would be essential for a refuse vehicle to reverse into the access road, but no swept path has been provided to demonstrate an 11.2m length refuse vehicle can access and egress acceptably. As stated previously 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.

- *Confirmation of proposed street lighting*

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

- *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. The parking arrangements for unit 29 have been amended to an acceptable arrangement and the turning head at this point removed and the footway link realigned.

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

A full review of the latest submission has been undertaken and there are 15 number dwellings that are 3 bedroom but have been provided with two car parking spaces which falls under the maximum standard of 3 car parking spaces. Therefore there is potential that these dwellings could generate a demand for on-street parking.

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 visibility of pedestrians / 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. These remain a concern at plot 2/3, 4, 36/37, & 6.
- 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.
- The latest proposals have increased the level of parking for some units but many plots are numbered incorrectly with 35. There is a reduced shortfall from the parking standards and therefore less potential to cause overflow parking on the busiest stretch of the site access road. However, the LHA would still prefer to see the arrangements with three car parking spaces in a row reduced down to a maximum of two in a row consecutively within the site.
- 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 refuse arrangements for units 44-46 have been amended, however, no swept paths have been provided to demonstrate the new arrangement works for refuse vehicles. Swept paths should be provided.
- There is still no clarification on a ped/cycle link through to Clerc-Y-Mendy, the applicant is requested to clarify the ownership of the land to provide a steer as to whether this can be delivered or not.
- 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.
- Clarification is required over the cycle parking provision/stores for the 1 bedroom units

- that do not have private gardens (plots 10-13)
- The LHA would recommend the removal of the raised plateau outside plot 27.
  - There are two areas at bends in the road (outside unit 1 and unit 6) where there appears to be a set back of the footway, can the applicant clarify if these are proposed 'overrun areas' or if they are proposed to be kerbed and surfaced.

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.

on behalf of Chief Officer, Environment & Technical