

MEMORANDUM



From:	Chief Officer, Environment & Technical Regulatory	To:	Chief Officer Planning &
Our Ref:	ET/DC/MZ/P/2023/0186	Your Ref:	P/2023/0186
Date:	31/07/2024		

**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.*

The same revisions two Vehicle Tracking drawings (Ref: PSH06-013-C-Vehicle Tracking (Refuse).pdf and Ref: PSH06-015-B-Vehicle Tracking (Pump Station).pdf) have been provided as were reviewed for the June response. **This issue has not been addressed.**

- *Confirmation of refuse collection arrangements for Plots 11-16 and 43-45 with additional vehicle tracking, if necessary.*

The same revisions two Vehicle Tracking drawings (Ref: PSH06-013-C-Vehicle Tracking (Refuse).pdf and Ref: PSH06-015-B-Vehicle Tracking (Pump Station).pdf) have been provided as were reviewed for the June response. Swept paths indicate the vehicle bodies swinging over the footway which isn't acceptable. The southernmost area of the site is not shown on the plan either. **This issue has not been addressed.**

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

The same revisions two Vehicle Tracking drawings (Ref: PSH06-013-C-Vehicle Tracking (Refuse).pdf and Ref: PSH06-015-B-Vehicle Tracking (Pump Station).pdf) have been provided as were reviewed for the June response. Swept paths indicate the vehicle bodies swinging over the footway which isn't acceptable and do not show routing through the full site. **This issue has not been addressed.**

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

Revised site layout plan (Ref@1522-sit-P01 rev N) shows updated plot numbers so what were Plots 17-21 on rev E are now Plots 18-22 on rev N. It is noted that although the layout of parking and footways/paths has been revised the footway width does not appear to have been widened. Also, the footpath between plots 18 and 19 (previously 17 and 18) has been mostly removed. On rev N plots 18 – 21 have reduced access (no footways/paths) to what was

previously proposed. Plots 41 and 42 on rev E are Plots 42 and 43 on rev N. There does not appear to be any footway widening. Footway widths of 2m are required where there are residential units on the frontage on all roads that the developer wishes to be adopted. **This issue has not been addressed.**

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

It is not clear if 0.6m service strips have been provided. **This issue has not been addressed.**

- *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.*

It is noted that the 'focal point' has been removed (in rev N) and amendments have been made to Plot 34 (Plot 22 in rev E) including a boundary wall. As per Manual for Streets standard the boundary wall should not exceed 0.6m in height to ensure small children can be seen by drivers. **Clarification is required for the proposed wall heights.**

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

Revised visibility splays have not been 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 not been provided. **This issue has not been addressed.**

- *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 E and rev N 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. **This issue has not been addressed.**

Further to the above:

- Long lengths of dropped kerbs alienate the frontage for overflow or visitor car parking
- The visibility from the driveway for Unit 1 is not acceptable due to the location of the high level fence for No 2 Clerc-Y-Mendy which will restrict visibility from the drive onto St Mary's Avenue
- There are concerns over driveway alignments, driveways should be accessed at 90 degrees to the footway to ensure adequate visibility is provided. This isn't the case for the driveways for units 4, 5, 6, 33, 7, 8, 9, 10, 23.
- There are no indications of refuse storage within each plot, there is a concern that the bins may block footways or parking spaces due to the lack of access to the rear gardens, also clarification of bin collection arrangements required for Plots 44-46. WCBC may decline to access private roads and vehicles will not reverse further than 12m and there is a maximum distance of 15m for operatives or residents to walk moving bins.
- Swept paths of a 7m long (medium sized) delivery vehicle should be provided in the

turning head proposed outside unit 46.

- Parking provision for units 35-37 falls short of the WCBC 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.
- The access to plot 23 is not acceptable, its exceptionally narrow and accesses at an oblique angle restricting visibility on safety grounds
- The parking space allocated to plot 22 closest to plot 23 is not acceptable as it results in reversing over the length of the existing footway, and this footway is required to be 2m wide to meet adoptable standards where there is residential frontage access
- The same issue for the eastern most parking space for plot 24, results in reversing extensively over the footway, where the building line of plot 24 restricts visibility which compounds the safety issue
- The same issue for the driveway for unit 41
- The same issue for the driveway for unit 42
- As stated previously the footway widths are not acceptable, and there is no footway in front of plots 18 and 19, this is not acceptable on pedestrian safety grounds.
- A service strip is not acceptable where there is residential frontage access, a 2m footway is required in front of units 25 to 29.
- 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 footway is required to be 2m in front of units 42 and 43
- The refuse arrangements for units 44-46 are required to be clarified to comply with WCBC standards, is this proposed to stay a private drive? There is no footway, no service strip and no street lighting.
- There is still no clarification on a ped/cycle link through to Clerc-Y-Mendy
- Swept path of a large car turning and exiting plot 34 in forward gear is required.
- Pedestrian access for units 35 to 37 need amendment as there is no clear pedestrian access if cars are parked on the spaces shown.
- The footprint of plot 3 blocks visibility from the drive as there is no set back from the footway.
- There are concerns regarding visibility from plot 10's car parking space, can the applicant clarify if that is fencing shown around the space.
- The footways for units 20-21 are not adequate as if cars are parked in the spaces there isn't a clear route through.

In its current form the proposals are not acceptable on highway and pedestrian safety grounds. Many of the issues listed above have been raised previously by the LHA, but not addressed. Therefore the LHA would like to be clear that the issues need to be addressed to meet WCBC standards and for the safe operation of the highway for all users of the proposed site.

A large, bold, handwritten signature in black ink, appearing to be a stylized representation of the letters 'R' and 'M'.

Chief Officer, Environment & Technical