

MEMORANDUM



From:	Chief Officer, Environment & Technical	To:	Chief Officer Economy & Planning
		FAO::	Sharon Holman
Our Ref:	ET/DC/DB/P/2023/0186 Revision 5	Your Ref:	P/2023/0186
Date:	02/03/2026 further to response 03/11/2025		

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

Following review of the additional information provided, the Local Highway Authority (LHA) offers the following observations relating to Rev T of the site plan and swept path analyses provided:

1. Pumping Station Access and Tanker Movements

Swept paths for the tanker accessing the pumping station remain tight, especially around bends and junctions. If on-street parking occurs, there is a significant risk that the tanker, required for both routine maintenance and emergency response, may not be able to access the pumping station.

No mitigation has been offered to address this concern, however the LHA expand on this in item 2 below. Whilst this route can be protected with double yellow lines, having the resources to enforce is a challenge, and it is always a last resort in residential estates, when there is an opportunity to design out concerns.

2. Parking Provision

Three-bed dwellings are provided with two spaces. LPG16 refers to a maximum of 3 spaces (excluding the garage) for 3 and 4 bedroom dwellings. It is accepted that 2 spaces (excluding garage) is commonplace for 3 bedroomed dwellings in sustainable locations around the county. However, given the above concern and the fact that a 3 bedroom house can accommodate 4 or 5 people and easily 3 adults each with cars or vans, the LHA remains concerned that any on-street

parking along the access route to and from the pump station could obstruct tanker (and refuse vehicle) movements.

The LHA will accept linear arrangements of three parking spaces in this instance and request the applicant includes for 3 spaces plus garage for all the 3 bedroomed dwellings along the site road to and from the pump station to mitigate risk as a minimum. It is acknowledged that the Roe V2 and Wit housetypes are 3 bed dwellings, and 3 spaces have been provided.

3. Plot Numbering

Plot 35 is duplicated and should be corrected to reference plots 37 and 38 and refer to the bedroom numbers please.

4. Shared Access for Plots 11–18

The applicant is asked to justify the retention of the shared access without a turning area and clarify the proposed refuse collection arrangements. Refuse collection points must be located within 12m of the adoptable highway, and the LHA is not obliged to service unadopted shared drives.

5. Other comments:

Plot 35 is still duplicated in error, and the LHA request it be updated

Can the applicant provide justification for retaining the shared access to plots 11-18 without turning and advise on refuse collection points.

Bin collection points are required near to the edge of the adoptable highway, within 12m deemed to be the maximum distance a refuse wagon will reverse to collect. The LHA are not obliged to access unadopted shared drives.

The road widening strips suggested as rumble strips are acceptable as tarmacked surfaces matching the road itself, without any delineation in a quiet estate road.

3rd November 2025 Highways Response 4:

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

Further to previous LHA comments and receipt of updated plans, the LHA note continued concern regarding the following aspects:

- 1. Potential conflict between roadside parking and tanker access to the Welsh Water adopted pump station. This is of particular concern outside plots 1-4 and 34-38 (Note typo error on plot numbering between plots 34 and 40). Whilst the frequency of tanker trips may be low over time, the importance of access could be of critical importance in the case of any failure in the sewage treatment pumps. Avoiding roadside parking obstructing access on the route to and from is therefore very important. On reviewing the 12.2m tanker swept paths provided, parked vehicles along the site entrance on the bends could cause a critical obstruction. **Can the applicant demonstrate how this concern can be mitigated?***
- 2. Inadequate turning head to the adoptable highway outside plot 19. The swept path provided shows overrun onto the footpath.*
- 3. Lack of turning for a 7m delivery van within the private shared driveway serving plots*

11 to 18 inclusive

4. **The rumble strip feature indicated outside plots 7 and 27 driveways is not necessary?**
5. **Does the pump station proposed comply with Welsh Water adoption standards, with a one way access?**
6. The LHA are concerned at the provision of 1nr space only for flats, where 2 adults with cars may live, particularly located in a confined turning head. This is considered an under provision by the LHA in this instance. As noted previously, parking below the maximum for 3 bed dwellings along the tanker route, or in the turning head, are also of concern for reasons noted above.
7. Please clarify the detailing of the apparent overrun areas. Will these be in contrasting colouring/surface, but capable of withstanding HGV loading. **(As above)**
8. In addition to drive parking spaces, adequate width for wheelchair/pram access should be provided alongside the parking space. **(Please demonstrate this has been considered in all parking spaces)**

For reference, the following was LHA's response 3, retained for checking and confirmation of response please from the applicant, noting the change of staff vetting the scheme within the LHA. Generally, the provision of refuse collection points is noted and accepted.

Response 3:

- 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, however it is noted that lighting is usually catered for within a section 278/38 application.

- 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:

- 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 some 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.
- 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.

Summary:

In its current form there are queries still outstanding relating to highway matters, that need to be addressed.

RWE Edwards

Contracts & Engineering Manager

on behalf of Chief Officer, Environment & Technical