

COMMENTS IN RESPECT OF FURTHER CONSULTATION RESPONSES (Rev 2)

CRIME PREVENTION OFFICER

(i) Site layout

All vehicle parking bays are within curtilage and/or overlooked.

Agreed – no amendment necessary.

However I have concerns in respect of the link to Riverside Walk as this connection undermines the defensible space of the development and should be designed out. Such links on other developments have caused issues.

Given the concerns of the crime prevention officer, the link to the Riverside Walk has been removed (see revised drawing no. LANDSCAPE2A(REV2)).

Pedestrian routes must be designed to ensure that they are visually open, direct, overlooked and lit. This link is not. Routes should also not be segregated from one another or provide access to rear gardens as such paths have been proven to generate crime. Paths ideally should be 3 metres wide.

The cycle access link to the bridge has been widened to 3000mm, thus satisfying these concerns.

I also have concerns in respect of the public open space areas between plots 9 and 10 and at the rear of plots 22-25.

I am concerned that the area between plots 9 and 10 as this area is directly adjacent to the properties and will result in all probability cause annoyance for the residents of the homes adjacent to this area. In addition this space provides access to the rear gardens of these properties.

In respect of the space to the rear of plots 22-25 this gives easy access for criminals to the rear gardens of these plots.

Both open space areas should be designed out. If they are to remain they must be planted with thorny plants or bushes to stop would be criminals gaining access to these areas.

Whilst these comments are noted, it is felt that small areas of open space are still required and to this end, a revised drawing shows an area of public open space adjacent to plot 21. The former open space area between plots 9 and 10 has effectively been removed, whilst that between plots 22 and 25 has been redesigned as pedestrian access to the archaeological area of interest. In addition, and in order to compensate for this public open space reduction, the three areas identified for online attenuation will have open space functions.

Entry onto the estate must be restricted to the designated routes.

There is only 1 no. principal road access to the development, together with the cycle/walkway linking to the Amman Valley Walk.

(ii) Lighting

Lighting on the estate must meet the British Standard 5489:2013.

Agreed – included in ‘Post-Construction Crime Prevention Measures’ in revised Construction Method Statement (CMS 2nd Revision).

(iii) Boundary identification

Defensible space using symbolic barriers e.g. pillars, rumble strip, or a change of road surface, i.e. colour or texture, must be built into the design to encourage a feeling of territoriality amongst users especially at the entrance to the development.

Changes of road surface can only be agreed with the Highway Authority. For adoption purposes the road surfacing has to be of a certain type and standard.

There must be a change of surface, i.e. colour or texture, to identify public areas from private or semi-private areas e.g. the footpaths from the driveways/front gardens.

Agreed – this is already the case.

Preferably front boundaries would be identified by low walls and gates.

Not possible as front boundaries are often utilised for car parking spaces.

(iv) Landscaping and planting

Overgrown shrubs and other thick barriers that are in close proximity to public areas must be avoided and clear sightlines must be maintained over long distances. Windows and doors must not be obscured by landscaping features and trees in public areas must not have any foliage below 2 metres from the ground.

Agreed – adequate sight lines already exist.

Trees and other landscaping features must not be positioned where they could create hiding/entrapment spaces, obscure signage and lighting or provide a potential climbing aid into properties.

Agreed – this has already been taken into account in the submitted design.

There must be clear lines of sight across the development and clear unobstructed views of the parking bays from the properties.

Agreed – this is already the case with all parking bays and their respective dwellings.

(v) Public open spaces

These areas should be located where they are afforded good natural surveillance from residents to provide protection for the young children using the areas. Also this would reduce the risk for the areas being targeted for anti-social behaviour when not in use.

Agreed – all areas of open space are subject of natural surveillance from nearby dwellings..

Ideally the areas would be protected by railings/fencing to prevent vehicular entry and they should be locked out of hours.

It would be difficult to try and prevent entry into these open space areas. If residents are excluded from these areas it will remove residents' rights to enjoy the area at all times (dog walking, jogging, etc.).

Any planting must be of the low level type, i.e. plants or bushes must only grow to a maximum height of 1 metre and trees should have no branches below 2 metres from the ground to afford maximum surveillance of the spaces.

Agreed – this is a matter for the longer term maintenance of the site's 'plant' resource.

They should not be located where they provide access to the rear of properties or be located between and directly adjacent to properties where they could cause issues for residents in properties adjacent.

Agreed – this has already been taken into account.

(vi) Vehicle parking

Vehicle parking should be within curtilage and must be overlooked preferably by rooms in the properties ideally, that are usually occupied e.g. living rooms, kitchens.

Agreed – this is already the case.

During the hours of darkness, the bays must be well illuminated, and they must enjoy good natural surveillance from the properties with unobstructed views.

A street lighting plan will secure adequate illumination and will be drawn up in consultation with the Highway Authority.

(vii) Garage security

All garage doors should meet the standard PAS 24 2016 or equivalent. There should be no windows fitted in garages and garages should have an alarm fitted that meets the relevant British Standard.

Agreed.

(viii) Side and rear boundaries

The walls/fencing/railings and gates preventing access to the rear and sides of the properties should be robust, at least 1.8 metres high (2 metres high if the side or rear gardens are adjacent to open land or a footpath). To prevent it being climbed the perimeter security must be of a suitable design.

Agreed – 1.8 m high fences are incorporated in the scheme.

Gates must be lockable both sides with a key, the same height as the adjacent wall/fencing and sited at, or as near to, the front building line of the properties as possible.

Agreed.

Rear and side gardens must be secure areas.

Agreed – all rear and side gardens are enclosed by timber fencing.

(ix) Garden sheds

Garden sheds should be sited away from the rear fencing or walls to prevent assisting people in climbing over them.

Not a matter that can be realistically controlled. The developer will however release advisory information to prospective property purchasers.

(x) Bin stores

Bins must be kept in secure areas.

Agreed – all bins stored within enclosed rear gardens.

(xi) Bicycle stores

Bike stores must be secure, lit and overlooked by the properties (please visit www.securedbydesign.com for more information).

Agreed.

(xii) Security lighting

Security lighting should be installed controlled preferably by photo electric cells or time switches or alternatively PIR detectors. The lighting should protect the rears and sides of the homes, the parking bays and the driveways.

Agreed – appropriate security lighting will be incorporated into design. Added to 'Post-Construction Crime Prevention Measures' in revised Construction Method Statement (CMS 2nd Revision).

Callers at the external doors of the properties must be lit during the hours of darkness by appropriate lighting.

Agreed – appropriate security lighting will be incorporated into design. Added to 'Post-Construction Crime Prevention Measures' in revised Construction Method Statement (CMS 2nd Revision).

(xiii) Drainpipes

If the drainpipes of the properties are not within the fabric of the buildings they must be designed so that they do not offer an assist to climbing.

Noted - to be considered at construction stage.

(xiv) Blank walls

Windowless elevations or blank walls adjacent to space to which the public have access, should be avoided and provide at least one window to a habitable room wherever possible. Where blank flanking walls are unavoidable, a 1 metre 'buffer zone' must be created.

Agreed – where feasible, but where not, security cameras to be introduced. Added to 'Post-Construction Crime Prevention Measures' in revised Construction Method Statement (CMS 2nd Revision).

(xv) Public utilities

If smart meters are not installed, meter boxes must be fixed to, or as near to, the front building lines of the properties as possible.

Agreed – meter boxes to be fitted at front of dwellings. Added to 'Post-Construction Crime Prevention Measures' in revised Construction Method Statement (CMS 2nd Revision).

(xvi) Access control

Access into apartment blocks should be controlled if there are 4 or more apartments using one communal entrance. Entry should be controlled by access control with audio and visual verification fitted.

Apartment blocks are not proposed for this site.

(xvii) Door security

All external doors in the properties must meet the standard PAS 24 2016 or equivalent and should be third party tested and certificated. The entrance doors into the apartment blocks must also meet the same standards.

Agreed – however apartment blocks are not proposed for this site.

The individual apartment external doors must also meet the standard PAS 24 2016 or equivalent and also should be third party tested and certificated.

Agreed – however apartment blocks are not proposed for this site.

Doors that are described as fire doors, or where fire performance is declared or implied, are required to have third-party certification for both security and fire performance. Fire doors must have no external furniture fitted.

Agreed – this is a matter for Building Regulations.

Glass in door panels or adjacent to door panels must be laminated.

Agreed – this is a matter for Building Regulations.

Doors in recesses of more than 600mm must be avoided.

No recessed doors are proposed for this site.

(xviii) Window security

All vulnerable windows fitted, e.g. ground floor windows, windows above flat roofs, must meet the PAS 24 2016 or equivalent and should be third party tested and certificated. They should also have key operated window locks fitted.

Agreed - added to 'Post-Construction Crime Prevention Measures' in revised Construction Method Statement (CMS 2nd Revision).

(xix) Intruder alarm system

A 13 amp fused spur should be installed in each individual property. Ideally all properties would have an intruder alarm fitted up to the relevant British Standard.

The necessary electrical wiring layout will be designed to allow the fitting of intruder alarms by each future household. Added to 'Post-Construction Crime Prevention Measures' in revised Construction Method Statement (CMS 2nd Revision).

(xx) Identification of properties

Property numbers and street names must be clearly displayed.

Property numbers and street names will be determined in conjunction with the Local Authority/Post Office/Community Council.

TREE OFFICER

Regarding the revised landscaping proposals for the above site as shown on drawing number LANDSCAPE 2A(REV) Rev.1 all the relevant information regarding tree selection, planting and post planting maintenance have been included.

Noted.

My only note of caution is the planting of the Laburnum T7. A very attractive tree but it does produce poisonous seed that young children could be tempted to eat.

Agreed – *Betula pendula* to be planted instead (drawing no. LANDSCAPE2A(REV2) amended).

The tree assessment for the site is shown on drawing number TREE01A. I agree with this assessment and the proposed works.

Noted.

NRW

Raises no objection to the discharge of condition 20 but offer the following comments:

Noted.

Having reviewed the Construction Method Statement prepared by JCR Planning, 1st revision December 2021, they are satisfied our concerns raised in our letter 8 July have been addressed.

Noted.

Advisory

It is possible that surface water contaminated with silt could drain from the development into the river during periods of heavy or prolonged rainfall. It is unclear how much of a riparian corridor will be retained and whether it will be undisturbed, therefore we recommend the installation of silt netting along the top edge of this zone along the entire boundary of the site with the river.

Silt netting and other measures will be introduced to mitigate any silt contamination.

We would highlight that some of the measures proposed may not be feasible i.e. water produced by jet washing will not be discharged to the river nor foul sewer it will be retained on site and possibly be reused.

Noted.

DWR CYMRU/WELSH WATER

Offer no further comments.

Noted.

BIODIVERSITY

Advises that the landscaping proposals are acceptable from a biodiversity point of view, no further comments to make.

Noted.

PUBLIC RIGHTS OF WAY OFFICER

Advises that the Public Right of Way shall be protected at all times and any damage caused to the Right of Way shall be rectified to the satisfaction of this authority. No alteration or change of condition to the PROW is to be undertaken without further consultation with the Countryside Team.

Agreed and noted.

HIGHWAYS OFFICER

Raised the following concerns:

Active travel needs to be considered, there is an existing cycleway which the site is proposing to link with however no provision has been made for a cycleway through the development itself. This has not been addressed, have the liaised with our Active Travel Department? As mentioned they have they have not made any allowances for an Active Travel route through the development – this could be accommodated by widening the footway to 3m on one side.

As requested, one of the footways through the site has been widened to 3 metres (see drawing nos. LANDSCAPE2A(REV2) and GENPL2A(REV2)).

In respect of a provision of a cycleway link from the development to the existing footbridge, the plan provided does not annotate the existing footbridge. In the interest of clarity the footbridge must be annotated on the plan to ensure the proposed link is located in the correct place, furthermore the width of the link shall be 3m wide and surfaced in a bitumen bound material with adequate drainage. This has now been annotated on the plan we will however need to see full construction details for this.

Full construction details of the path will be in accordance with the Highway Authority's standard requirements and which can be dealt with by way of condition. Given that there may be a requirement to use permeable surfacing, the final decision will need to be based on SAB details, which will in turn be approved by the Highway Authority.

The highway layout does not comply with NPCBC 'Design for the Layout of Roads whereby the highway should be designed to a 20mph limit.

A number of traffic calming measures have been introduced and included within the revised site plan. Full details will be agreed as part of S38/278 procedures.

a. *There are unrestraint straight lengths of highway which lend itself to increased vehicle speeds. Vertical deflections are not a suitable mode of reducing speed within a residential development, the highway needs to be designed to a 20mph. Horizontal methods in the form of narrowing's or build outs are required.*

Three horizontal build outs are now proposed as a means of traffic calming. A vertical deflection strip is also suggested but this can be changed to a horizontal build out if still deemed necessary. All traffic calming measures have been incorporated within the scheme and will form part of the highway adoption procedures.

b. *The traverse length of the turning head is overly long and will result in an unacceptable reversing distance for vehicles including refuse and recycling vehicles. Acceptable*

Noted.

c. *Forward visibility sight lines of 33m around plots 17 and 35 need to be annotated on the plan within which nothing over 600mm in height shall be erected or allowed to grow, these areas are normally adopted by the Local Authority. Not annotated on the plan*

Now annotated on submitted drawing revisions.

d. *Gradients of the highway and driveways have not been provided. There is now a note on the plan which states that 'GRADIENT OF ALL DRIVEWAYS WILL BE CONSTRUCTED TO*

"FALL" TOWARDS HIGHWAY FOR DRAINAGE PURPOSES' this is not acceptable for surface water to flow out onto the highway.

Amended – surface water will not flow onto the highway.

e. The proposed carriageway construction is not in accordance with NPTCBC 'Specification for the Constriction of Roads for Adoption' **Not addressed**

The submitted drawings have been amended to take into account NPTCBC's road adoption specification.

f. The proposed footway around the turning head located by the open space (opposite plot 22) is not acceptable as it does not provide a full 2m footway around the whole turning facility, pedestrians will be forced to step into the carriageway. This is essential here due to its proximity to the open space area.

The submitted drawings have been amended.

4. Driveway dimensions are incorrect and should be as follows:

Single driveway 6m in length by 3.6m wide

Double driveway (tandem) 10.8m in length by 3.6m wide

Triple driveway (tandem) 15m in length by 3.6m wide

Double driveway (side by side) 6m in length by 6.2m wide

Triple driveway (side by side) 6m in length by 8.8m wide

Above is acceptable

Noted.

5. Access to driveways are not permitted from the kerb radii's – plot 17 and 25 **Parking for Plot 17 has been revised however it is still not acceptable due to its proposed location which results in vehicles having to traverse along the footway to access the spaces.**

This is also the case for the parking for plot 22

The amended layout confirms that no vehicles will traverse along the footway.

6. The details provided for the discharge of Condition 20 – Construction Method Statement are acceptable

Noted.

DRAINAGE OFFICER

SAB approval will be required prior to any work commencing. To commence work is a breach of SAB approval required under Paragraph 7 (1) Schedule 3 of the Flood and Water Management Act 2010 whereby legal action will be taken by the Authority under The Sustainable Drainage (Enforcement) (Wales) Order 2018. Guidance and applications can be found on www.npt.gov.uk/sab

Work will not be commenced until SAB approval has been secured.

Should any springs or ground water seepage be encountered the on site works in that area shall cease until a scheme for collection and disposal of the water has been submitted to and approved in writing by the Local Planning Authority. No ground water shall ever be discharged into the proposed drainage scheme.

Agreed.

There must be no interference, alteration or diversion of any ditch, watercourse, stream or culvert crossing or bordering the site, without prior consultation and agreement with the Authority.

Agreed.

Unless otherwise agreed in writing by the Local Planning Authority, foul water and surface water discharges shall be drained separately from the site.

Agreed.

No surface water or Land drainage run-off shall be allowed to connect, either directly or indirectly, to the public sewerage system unless otherwise approved in writing by the Local Planning Authority.

Agreed.

Adequate provision shall be made for the drainage of the site, to ensure that the drainage of any adjoining land is not interrupted or otherwise adversely effected by the development during the lifetime of construction.

Agreed.

ENVIRONMENTAL HEALTH OFFICER

Comments still awaited.

Noted.

PLANNING OFFICER

With regards to the layout I have concerns that the proposed boundary treatment extends beyond the front elevation of the properties on Plots 1,9,10,18,21,22,26 and 28 which is unacceptable on visual amenity grounds and would request that both the layout and landscaping plans are amended to show its removal together with the amendments required as result of the responses received above.

Agreed – boundary treatments for those affected properties highlighted have been amended (see drawing no. LANDSCAPE2A(REV2)).