

## Highway Response

Ref: 24/0782

Recon

Date: 07/02/25

**PROPOSAL:** RESERVED MATTERS (CONDITION 01) FOR PROPOSED RETAIL STORE, NURSERY (D1) AND 3NO. COMMERCIAL UNITS AND ASSOCIATED WORKS IN LOCAL CENTRE AND PARTIAL DISCHARGE OF CONDITIONS 07 (LANDSCAPING), 08 (MATERIALS/FINISHES TO EXTERNAL SURFACES), 9 MATERIALS/FINISHES FOR HARD LANDSCAPED AREAS), 10 (BOUNDARY TREATMENTS), 12 (PARKING), 15 (EMERGENCY ACCESS), 16 (ROADS, CYCLEWAYS AND FOOTWAYS), 17 (GREEN TRAVEL STRATEGY), 19 (NOISE ASSESSMENT), 22 (LIGHTING), 23 (ECOLOGICAL MANAGEMENT PLAN), 24 (SITE LEVELS), 27 (GROUND CONDITIONS), 28 (VERIFICATION REPORT), 32 (PILING WORKS), 33 (SURFACE WATER), 34 (FOUL AND SURFACE WATER DRAINAGE AND STORAGE) AND 39 (CARBON REDUCTION STRATEGY) RELATING TO OUTLINE PLANNING PERMISSION 06/0471 FOR REDEVELOPMENT OF SITE TO CREATE A MIXED USE URBAN EXTENSION

**SITE:** Land West Of 1 Kings Wall Drive Newport South Wales

Case Officer: Geraint Roberts

Highway Officer: Kevin Jackson

Following receipt of a Transport Note 03 (referred to as the TN below) we would update our comments as follows.

### Highway recommendation:

Objections relating to servicing, parking and cycle parking policies resulting in highway safety concerns.

### Highway Comments:

The TN provides a rebuttal to our previous comments (08/11/24). The paragraph numbers below match those of the table within the TN for ease of reference.

### Accessibility/Sustainability

1. The TN refers us back to the original TN 01. Whilst this does refer to the infrastructure for cycles and some proposed bus stops it does not address the issue raised. There is an inner ring road (including Bessemer Dr) which is all to be served by buses.

The responses do not consider the buses that are anticipated to pass closest to the site and which are likely to serve the closest and most likely catchment area. Instead, they refer to services to areas that are not part of their catchment.

As previously advised, the services proposed for Bessemer Drive / Main Street should also be considered for more local patrons, residing on the extensive and adjacent residential estates. We would expect to see a commitment to a stop adjacent to this site, albeit reliant on another stage to come forward to complete the link, this would be within highway and should be conditioned/ provided via s106.

2. Additional routes and measures are noted and welcomed. However, the plan does not appear to show any linkage to the south/ south -west.

In addition, the route from Bessemer past the commercial units/cycle parking raises concerns. The desire line crosses the service access, where vehicles will be reversing, and the entire route is poor in terms of alignment and width. We would however anticipate significant pedestrian movements along this route.

The detail of this route still has not been provided, but visibility, gradients Across the service access), lack of definition etc. are all likely to contribute to objections.

3. Refer to 2 above, the plan has been superseded, and this stop is not the most relevant to the likely catchment area.
4. The proposed cycle parking is only suitable for visitors (short stay). Enclosed and secure provision is needed for all employment uses. If it is sufficiently secure and well located/has good surveillance it could be shared. Cycle parking will only be used if it is fit for purpose and the intention is to encourage cycling as per policy. The cycle proposals are therefore still not considered adequate.
5. As a minimum we would expect all commercial development to have 5% active EVC. They should not be reliant on other businesses.

6. The TN contains a section on Travel Planning; however, it does not give sufficient commitment to specific and meaningful measures or targets. It is also undermined by the lack of connectivity described above and the excess parking described below. T

The Active Travel Team should be consulted on this topic, but we would maintain that the plan is not sufficiently resourced or committed.

7. Whilst the application of GEA is technically in line with policy, it is not considered conducive to sustainability principles to have a step change in provision for a marginal increase in the floor area. The SPG allows for a 20% increase on smaller stores without additional parking and notes that a 33% increase in GFA only produces a 10% increase in transactions. The dogmatic application of standards that have what are really arbitrary cut off standards is clearly not appropriate.

The Appeal case referenced does not influence our approach here, as it is clear from the Inspector's comments that the site is poorly served in terms of active travel or public transport (para 21), so is already reliant on car use foremost of its trade. In addition, the Inspector states (At para22):

*"A few extra spaces here would be largely immaterial to most people's journey planning."*

The matter at hand is not accurately described as "a few extra spaces". A difference of 1:14 (=146) Vs 1:40 (=51) results in an additional 95 spaces and alternative modes are available and would be discouraged.

A number between 51 and 146 could be agreed, subject to some rationale, but there is no justification for the proposed number. The rebuttal seems to suggest that the methodology used was not robust enough and that we should provide for seasonal peaks. These are not accepted principles. Car parks would be empty most of the year if this was adopted practice and the traffic impacts would also be unrepresentative, and that approach would demand over engineered solutions.

We note that the proposed number is less than the 1:14 ratio would allow so assume that the applicant recognises that this is not an appropriate standard.

We could agree to provision of more than the peak accumulation to ensure circulation etc. but an anticipated peak of 63 would represent 85% of the total provision. A maximum parking provision of say 75 spaces, not 107, could be agreed. The proposals represent approximately 30% over provision.

It should also be noted that provision for commercial vehicles is also required, but these would not be appropriate within a public car park. This should be addressed. Whilst we accept that stores of this type are likely to have good management of goods in, there are likely to be overlapping fresh goods deliveries. We would also note that the planning permission would allow any operator not just this one.

8. The minibus parking is noted, but the conflicts with a key pedestrian desire line (and other parking) raises concerns.

No information has been provided to inform the parking numbers for the nursery. Without this information we would not be able to support the nursery.

9. Dimensions noted but 5.2m length is large for cars, but small for commercial vehicles. Popular vans such as sprinters range from 5.267 to 7.367m. None of these would be able to use the spaces. Operators often use larger vans than these. Overhanging vehicles would impact on circulation and servicing. We would not therefore accept 5.2m as a practical size for commercial vehicles. We would expect something in the order of 7.5m for small units like these.

In addition, for ease of reference and avoidance of doubt we would request that the dimensions of non-standard bays are annotated on a plan. This would avoid any need for further reference to the Masterplan.

10. RCVs are generally agile vehicles, with multi-axle steering. The maximum size of rigid vehicle that should be tested is 12m long. In addition, there is no control over the suppliers to these units and no justification for ruling out articulated vehicles up to 16.5m. Whilst these may/may not be common they should be tested to ensure they can pass through without incident or reversing, not least because the car park is for public use and pedestrians will be present.

The swept paths show that even the relatively agile and smaller RCV cannot negotiate the car park without reversing on/adjacent to a pedestrian desire line. We would also be concerned that the driver would not realise that they needed to follow the route taken and could easily get stuck in the car park. The swept paths therefore raise further objections on grounds of safety.

11. The rebuttal does not address the issues raised. The swept path clearly shows that the HGVs will conflict with pedestrians approaching from the north or nursery. The masterplan makes reference to servicing through the car park but explicitly states that deliveries would be "*subject to a management strategy to ensure that deliveries do not conflict with pedestrian and car traffic*" (section 8).

We consider the proposals conflict with cars and pedestrians and maintain the objection.

12. Procedures noted and no further comment.

13. We would not oppose out of hours servicing but would query if it is practical for all deliveries and seasonal demands. If this is proposed as a solution, we would need to ensure no deliveries from one hour before opening until one hour after opening and no waiting on site during the prohibited hours.

In conclusion we would maintain objections to the proposals on grounds of safety, sustainability and parking policies. For the same reasons we would object to any discharge of the following conditions.

Conditions 07 (landscaping), 9 materials/finishes for hard landscaped areas), 10 (boundary treatments), 12 (parking), 15 (emergency access), 16 (roads, cycleways and footways), 17 (green travel strategy) as these would be impacted by the necessary amendments to the proposals.