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Response to Newport City Council Highway Comments: 17-21 Wharf Road, Newport NP19 8ET

Item	Details
Application	Change of use from existing/former windscreen centre to international convenience store (Use Class A1).
Highway reference	RECON 26/0237, Highway Officer comments dated 22 May 2026.
Purpose of note	To address the maintained Highway objection and explain how the amended layout, visibility plan, operational controls, parking evidence and corrected trip generation assessment respond to each comment.
Documents reviewed	Transport Statement; Highway Response; revised proposed plan 2025.513_PL02 Rev A; visibility drawing VS-01 Rev A; Retail Statement Addendum; Appendix 2 property particulars/sequential review.

Executive Summary

This Technical Note has been prepared in response to Newport City Council's maintained Highway objection. The earlier draft response was criticised because it identified matters that could be provided, but did not take them forward through amended plan evidence. The applicant has now provided revised drawing information, including proposed plan 2025.513_PL02 Rev A and visibility drawing VS-01 Rev A, and this note updates the transport case accordingly.

The corrected trip generation assessment uses the full 285sqm gross floor area (GFA), rather than the 133sqm sales area. On that basis, the proposed store is forecast to generate approximately 38 two-way vehicle movements in the AM peak hour and 47 two-way vehicle movements in the PM peak hour. This is treated as the gross assessment for the purposes of access and local street operation. Even on that basis, the level of movement remains modest in absolute terms.

The existing parking survey dataset can reasonably be retained. The survey was undertaken using a recognised parking beat methodology within a 200m walking distance, at representative daytime and early evening periods, and it recorded observed parking stress rather than relying on theoretical assumptions. The Highway Authority's comments relate principally to interpretation of the dataset and the extent of reliance placed on individual streets, rather than the validity of the observations themselves. No technical reason has been identified that would render the survey observations unusable.

The revised layout now shows customer car parking, an EV charging point, customer cycle parking, staff cycle storage, a bin store, a defined pedestrian route and a store delivery point. The revised visibility drawing demonstrates a 2m x 2m pedestrian visibility splay and vehicle visibility of 2.4m x 43m east and 2.4m x 30m west, with boundary walls within the visibility splay limited to a maximum height of 600mm. These details directly respond to the comments that safe access and pedestrian visibility had not previously been demonstrated.

The proposal would bring a vacant/underused commercial building back into active use, provide a specialist local convenience amenity, reduce the need for some residents to travel further afield for culturally appropriate staple goods, and support activity close to Maindee District Centre. The alternatives are materially less beneficial: the building may remain vacant, may revert to a vehicle-related commercial use, or alternative premises may fail the operational requirements identified in the sequential review.

Response Matrix

Highway Issue	Response Now Provided	Conclusion
Floorspace and trip generation	The assessment has been corrected to 285sqm GFA. The 133sqm sales area remains relevant to trading format and customer-facing activity, but no longer forms the sole trip generation basis.	Corrected gross forecast is approximately 38 AM and 47 PM two-way vehicle trips. This remains modest and is assessed robustly for Archibald Street.
Pass-by/diverted trips and routing	Pass-by/diverted trips are considered as a wider network adjustment, not as the only access test. The local access assessment treats the gross vehicle forecast as the robust position.	The scheme is not reliant on perfect even distribution or on all movements being removed from Archibald Street.
Parking survey methodology	The existing dataset is retained. A 200m beat is a reasonable urban overspill catchment and the observations remain valid. The survey already excluded unsuitable/severed streets where appropriate.	No new survey is required. Any further discrete-gap review would be an interpretive addendum using the same dataset/photographs.
On-site layout	Drawing 2025.513_PL02 Rev A now shows customer car parking, EV charging, cycle parking, staff cycle storage, bin store, pedestrian route and delivery point.	The plan now provides the basic operational information requested by Highways.
Access and visibility	Drawing VS-01 Rev A shows 2m x 2m pedestrian visibility, 2.4m x 43m east visibility and 2.4m x 30m west visibility, with boundary walls within the splay no higher than 600mm.	Pedestrian visibility and errant-vehicle visibility have now been addressed.
Servicing	Servicing will take place outside public opening hours, by LGV only, with no HGV deliveries. Deliveries will be managed by booking/supplier instructions and staff supervision.	The revised plan identifies the delivery point and servicing can be secured through a Servicing Management Plan condition.
Cycle parking and EV	The revised layout shows customer cycle parking, internal staff cycle storage and EV charging.	The drawing demonstrates that space exists for the facilities previously described.
Policy and sustainability	The site is in a dense urban area, close to Maindee District Centre, bus services, footways and local residents. The store provides a needed local and specialist convenience offer.	The proposal accords with the sustainable transport hierarchy and supports reuse of a vacant commercial building.

1. Introduction

This Technical Note has been prepared by Nene Valley Transport Planning Consultants Ltd in response to the maintained Highway objection issued by Newport City Council in respect of the proposed change of use of 17-21 Wharf Road, Newport NP19 8ET from an existing/former windscreen centre to an international convenience store.

The Highway Authority's latest response does not state that the principle of reuse is unacceptable. The central criticism is that the earlier submission did not demonstrate, through plans and technical detail, that the constrained site could safely accommodate access, parking, servicing, cycle parking, EV provision and visibility. This note therefore focuses on the evidence now provided and the operational controls that can be secured.

The proposed store would operate as a small-scale international/Turkish-focused convenience store. It is not a large foodstore, discount supermarket or out-of-centre destination retail format. It would provide everyday staple goods, including culturally appropriate products, within a dense urban catchment close to Maindee District Centre.

2. Policy and Decision-Making Context

The application should be considered against Planning Policy Wales Edition 12, Future Wales, TAN 18: Transport, TAN 4: Retail and Commercial Development, the Newport Local Development Plan 2011-2026 and the relevant Newport supplementary planning guidance.

Planning Policy Wales places walking and cycling, then public transport, above private motor vehicle trips within the sustainable transport hierarchy. TAN 18 requires a proportionate assessment of transport effects, with parking and access considered in light of local circumstances, urban form, public transport accessibility and the availability of safe parking opportunities.

Newport LDP Policy SP1 supports sustainable development, while Policy GP4 requires appropriate access for pedestrians, cyclists and public transport, appropriate parking and cycle storage, and development that would not be detrimental to highway safety, highway capacity or pedestrian safety. Policy T4 requires appropriate parking provision. These policies require an evidence-led judgement, not a rigid suburban parking response where that would conflict with sustainable transport and placemaking objectives.

The proposal is also consistent with the local plan objective of reusing urban land and buildings. The site is an existing commercial building with a lawful commercial history, established accesses and a location within the urban area. The proposal would support local activity and reduce the vacancy-related harm associated with a derelict/underused building.

3. Existing Site Context and Lawful Fallback

The site is not a previously inactive residential plot. It is an existing commercial building formerly used as a windscreen/vehicle repair centre. The site benefits from established access arrangements from Wharf Road and Archibald Street and has historically generated customer, staff, servicing and vehicle-related movements.

That lawful fallback is material. A vehicle repair/windscreen operation could reintroduce vehicle movements, customer drop-off/pick-up activity, parts deliveries and staff parking demand. The proposal therefore changes the nature of commercial activity at the site rather than introducing activity into an otherwise quiet residential street for the first time.

The proposed use is preferable to the vehicle repair fallback in several transport respects. It is not vehicle-repair based, does not require customer vehicles to be worked on or stored, does not rely on vehicle parts deliveries, and can be operated through small-format retail management, defined customer parking, cycle parking, EV provision and controlled servicing.

4. Corrected Trip Generation Assessment

The Highway Authority is correct that the proposed trip generation assessment should be based on the 285sqm GFA. The 133sqm sales area remains relevant to the trading character of the store, customer-facing activity and comparison with a mainstream foodstore, but the corrected TRICS assessment below adopts 285sqm GFA for the purposes of highway review.

Peak Hour	In	Out	Two-way	Comment
08:00-09:00	19	19	38	Corrected gross TRICS-based forecast using 285sqm GFA.
17:00-18:00	23	24	47	Corrected gross TRICS-based forecast using 285sqm GFA.

The PM peak hour is the higher forecast period, with approximately 47 two-way movements. This equates to less than one two-way movement per minute across the hour. It is accepted that trips will not distribute perfectly evenly, and the access assessment should therefore consider the local street impact robustly. However, the absolute scale of movement remains modest for a commercial site within an urban area and would not be expected to give rise to a material network capacity impact.

For the purposes of local access, parking and Archibald Street operation, the gross vehicle forecast should be treated as the robust assessment position. This addresses the Highway Authority's point that the development is not accessed directly from the major road and that Archibald Street and adjacent minor streets will experience the access movements.

5. Pass-by, Diverted and Linked Trips

Convenience retail developments generate a proportion of pass-by, diverted and linked trips because some customers are already travelling through the area or are visiting other nearby shops and services. The submitted TS referenced TRICS Research Report 14/1 and research by Ghezawi et al. identifying an average pass-by proportion of approximately 72% for convenience store sites.

In response to the Highway Authority's comments, this adjustment is not used to avoid assessing the local access impact. Instead, it is used only to understand the likely level of genuinely new traffic on the wider network. The gross 285sqm forecast remains the basis for considering the operation of Archibald Street and the site access.

Peak Hour	Gross Two-way Trips	Estimated New Trips After 72% Adjustment	Use in Assessment
08:00-09:00	38	11	Wider network context only; gross trips retained for access assessment.
17:00-18:00	47	13	Wider network context only; gross trips retained for access assessment.

The site's relationship with Maindee District Centre is also relevant. The Retail Statement Addendum explains that the site is approximately 60m from the Maindee District Centre boundary and that linked trips may include customers walking from the District Centre, visiting the proposed store as part of a wider Maindee trip, or parking once within the wider area and visiting multiple shops and services on foot. This supports the conclusion that not every customer trip will be a wholly new car-borne movement.

Notwithstanding the above, the applicant accepts that all vehicle trips using the rear customer parking area will route via Archibald Street. The assessment therefore does not depend on pass-by/diverted trips to demonstrate the safe operation of the site access.

6. Parking Survey Dataset and Methodology

The applicant seeks to retain the existing parking survey dataset. This is considered reasonable and defensible. The Highway Authority has raised comments about methodology and interpretation, but those comments do not invalidate the observed parking data itself.

The existing survey was undertaken within a 200m walking distance using a recognised parking beat approach. It recorded observed on-street parking conditions during three periods: 10:00-11:00, 15:00-16:00 and 18:00-19:00. These periods are relevant to the proposed use because they capture typical daytime trading conditions and an early evening period when residential parking accumulation is more pronounced.

Survey Period	Recorded Parking Stress	Relevance
10:00-11:00	75.34%	Representative daytime trading period below the commonly referenced 85% high-stress threshold.
15:00-16:00	69.86%	Representative daytime trading period with material spare capacity observed.
18:00-19:00	87.67%	Robust early evening residential accumulation period; not the principal daytime commercial parking profile.

A 200m catchment does not assume that every retail customer will choose to park 200m away. It simply defines a reasonable urban walking area within which any residual overspill parking effect can be assessed. Customers will naturally prefer the nearest available space, including the on-site customer parking shown on the revised layout. The survey catchment is therefore a stress-testing tool, not a behavioural assumption.

The Highway Authority refers to the need for routes to be driveable and not convoluted. The survey approach already recognised local severance and constraints by excluding unsuitable or severed areas where appropriate, including streets requiring crossing of Wharf Road or constrained cul-de-sac arrangements. Where the Highway Authority considers that an individual length should be treated cautiously, that can be addressed by interpretation of the dataset rather than by commissioning an entirely new survey.

The Highway Authority also refers to discrete gaps. That is a refinement to the way capacity is presented, not a reason to reject the survey observations. The survey photographs and mapped observations can be used, if required, to provide a discrete-gap schedule from the same dataset. No additional site survey is necessary unless there is evidence that the original survey day was abnormal, affected by temporary restrictions, or otherwise unrepresentative. No such evidence has been identified.

In planning terms, the key question is whether the development would result in unacceptable parking stress or unsafe parking practices. The two daytime survey periods most aligned with the likely core trading profile were below 85% stress. The higher early evening period reflects background residential accumulation and represents a robust test. The proposed use also includes on-site customer parking, cycle parking, walk-in trade, linked trips and short-stay convenience shopping, all of which reduce the likelihood of sustained parking accumulation.

7. Revised Layout, Parking, Cycle Parking and EV Provision

The revised proposed plan, drawing 2025.513_PL02 Rev A, provides the plan-based detail requested by the Highway Authority. It shows the supermarket sales area at ground floor, ancillary storage/staff/office accommodation at first floor, customer car parking, an EV charging point, customer cycle parking at the frontage, internal staff cycle storage, a bin store, a defined pedestrian route and a store delivery point.

The revised layout is materially clearer than the previous submission because it identifies how the constrained site is to operate. Public customer parking is identified on the plan, while cycle parking is separated between customer cycle parking at the frontage and staff bike storage within the building. This responds directly to the Highway Authority's concern that it was not sufficient merely to state that facilities would be provided.

The provision of EV charging on the customer parking area supports Newport's parking and low-emission vehicle objectives. The exact charging specification can reasonably be secured by condition, as the revised layout demonstrates that the space exists and that EV provision would not compromise the operation of the site.

The site is constrained and it is not realistic or policy-compliant to require a suburban-format parking layout. Over-provision of car parking would either be physically impossible or would compromise pedestrian safety, cycle parking, servicing and placemaking. A balanced layout with defined customer parking, cycle parking, EV provision and a pedestrian route is therefore preferable in highway and policy terms.

8. Access, Visibility and Pedestrian Safety

Visibility drawing VS-01 Rev A directly addresses the Highway Authority's access and visibility comments. The drawing shows a 2m x 2m triangular pedestrian visibility splay at the proposed access, with all boundary walls within the visibility splay limited to a maximum height of 600mm.

The drawing also shows an x-distance of 2.4m, a y-distance of 43m to the east and a y-distance of 30m to the west. The drawing notes a road speed limit of 30mph and states that it has been designed in accordance with Manual for Streets standards. The plan identifies the one-way direction of travel and shows visibility in both directions, thereby addressing the Highway Authority's request that the banned direction should still be shown for errant vehicles.

The inclusion of pedestrian visibility is particularly important because the Highway Authority identified pedestrians as the most vulnerable users. The amended visibility plan now demonstrates how emerging drivers and pedestrians can see one another at the access interface, with the necessary boundary height control shown on the drawing.

The submitted TS also records that no personal injury collisions were identified within the study area during the reviewed five-year period, including Wharf Road, Archibald Street and surrounding junctions. While this does not remove the need for safe design, it provides useful context: there is no recorded collision pattern at the site accesses that would indicate an existing highway safety problem likely to be exacerbated by the proposal.

9. Servicing and Refuse Strategy

Servicing has been revised and clarified in operational terms. Deliveries will take place outside public opening hours, by light goods vehicle only. No HGV deliveries will take place. The revised layout identifies the store delivery point, and the bin store is shown within the site.

The Highway Authority has stated that a simple condition prohibiting HGVs may not be sufficient where a retailer does not operate its own national fleet. The applicant therefore proposes a Servicing Management Plan rather than relying solely on a vehicle-size condition. The plan would require supplier instructions, delivery booking, delivery time controls, staff supervision and a clear no-HGV rule.

Servicing Control	Proposed Commitment
Delivery hours	Deliveries to take place outside public opening hours, avoiding customer peak periods and avoiding conflict with customer parking.
Vehicle type	LGV-only servicing. No rigid HGV, articulated HGV or large supermarket delivery vehicle to serve the site.
Supplier management	Supplier instructions and delivery booking to specify maximum vehicle size and delivery point before orders are accepted.
On-site management	Staff to supervise deliveries and ensure the delivery area is kept clear during delivery periods.
Customer conflict	Deliveries outside opening hours remove the risk of service vehicles reversing amongst customers.
Refuse	Bins to be stored within the identified bin store and presented/collected in accordance with agreed waste management arrangements.
Enforcement	Servicing Management Plan to be secured by pre-occupation condition and retained for the lifetime of the use.

This strategy is proportionate to the nature of the store. The proposed use is a small specialist convenience store rather than a large national supermarket. Its operation can be organised around small, frequent or consolidated LGV deliveries, with stock stored in the ground and first-floor storage areas shown on the layout. There is no operational requirement for HGV servicing.

The previously submitted TS referred to swept path analysis for a 4.6 tonne light van with an overall length of 5.885m and kerb-to-kerb turning radius of 6.0m. The revised layout now identifies the delivery point. If the Highway Authority requires the swept path to be reissued over drawing 2025.513_PL02 Rev A, this would be a drawing presentation matter and would not alter the operational commitment to LGV-only, out-of-hours servicing.

10. Sustainable Transport and Local Amenity Benefits

The proposal is located in a dense urban area close to Maindee District Centre, Chepstow Road and Wharf Road. The Retail Statement Addendum identifies the site as approximately 60m from the Maindee District Centre boundary. The site therefore has a direct, walkable relationship with existing shops and services.

The TS identifies continuous pedestrian infrastructure on Wharf Road and Archibald Street, nearby crossing facilities and bus stops within the 400m guideline walking distance. Local bus services include routes 5, 6, 73, 74/74A/74C and X60, providing connections to Newport City Centre, Ringland, Chepstow, Underwood, Portskewett, Rogiet, Monmouth and intermediate stops. Newport Railway Station is approximately 2km west of the site and is accessible by foot, cycle, bus and car.

The proposed store would provide a much-needed local amenity. The Retail Statement Addendum explains that the store would provide Turkish, Middle Eastern, Mediterranean, Balkan/Eastern European and wider international convenience goods, including staple products such as bread, dairy, fresh/frozen meat, fresh produce, rice, pulses, oils, canned/jarred goods and household top-up items. Many of these products would be culturally specific, halal, imported or otherwise not widely available in mainstream convenience stores.

This matters in transport terms. By improving local access to specialist staple goods, the development can reduce the need for some residents to travel further afield for culturally appropriate food shopping. It also supports linked trips with Maindee District Centre and helps maintain active, walkable local service provision.

11. Alternatives and Planning Balance

The alternative to the proposed development is not a neutral position. The principal alternatives are:

- the building remains vacant or underused, with no local amenity benefit and continued risk of vacancy-related decline;
- the site reverts to its former/lawful vehicle-related commercial use, with customer vehicle drop-off/pick-up activity, parts deliveries and vehicle repair movements;
- the site is used for a lower-activity storage or similar use, which may reduce public trips but would not deliver the same local retail, regeneration or active frontage benefits;
- the applicant relocates to an alternative property, although the sequential review shows that realistic alternatives do not meet the operational requirements of the proposal.

Appendix 2 of the retail evidence reviewed 29 potential alternative properties. The majority failed the initial filtering exercise due to location, floorspace or site characteristics. Two sites passed the first stage but failed the second stage: a 197sqm Corporation Road property and 264 Chepstow Road.

The Corporation Road property comprised 197sqm GIA including retail floorspace at ground floor and residential accommodation above. The available realistic net sales area was identified as below 100sqm, even allowing flexibility, and the property was not served by dedicated parking or loading/unloading provision. The 264 Chepstow Road property comprised 113sqm GIA, again with residential accommodation at first floor, with a realistic sales area below 60sqm and no dedicated parking/loading provision. Both were therefore discounted.

The sequential evidence therefore supports the conclusion that there is no obvious alternative site that would deliver the same local amenity, floorspace, storage, visibility and operational characteristics with materially better highway outcomes. The proposed site already has commercial access arrangements and a commercial fallback, and the revised layout provides a controlled operational strategy.

In the overall planning balance, the proposal would reuse an existing building, provide a local and specialist convenience amenity, improve activity and passive surveillance, support the Maindee area and provide opportunities for walking, cycling and linked trips. Those benefits should be weighed against the modest scale of traffic generation and the now-demonstrated access, visibility, parking, cycle, EV and servicing arrangements.

12. Suggested Planning Conditions

If the Local Planning Authority is minded to approve the development, the following matters could reasonably be secured by condition:

- The development shall be carried out in accordance with the approved site layout, including customer parking, cycle parking, EV provision, bin store, delivery point and pedestrian route.
- Prior to first occupation, the cycle parking, EV charging/passive EV infrastructure and bin storage shown on the approved layout shall be installed and thereafter retained.
- Prior to first occupation, the visibility splays shown on drawing VS-01 Rev A shall be implemented and thereafter kept clear of obstruction, with boundary treatment within the visibility splay maintained at no more than 600mm in height.
- Prior to first occupation, a Servicing Management Plan shall be submitted to and approved by the Local Planning Authority. The development shall thereafter operate in accordance with the approved plan.
- No HGV deliveries shall take place at the site. Servicing shall be by LGV only and shall take place outside public opening hours unless otherwise agreed in writing by the Local Planning Authority.
- Prior to first occupation, details of customer parking signage and delivery management signage shall be submitted and approved.

13. Conclusion

The Highway Authority's latest comments are understood. The applicant has therefore updated the transport response to correct the trip generation assessment to 285sqm GFA and to rely on the revised layout and visibility drawings now provided.

The corrected trip generation forecast remains modest in absolute terms. The gross assessment is retained for Archibald Street and access operation, while pass-by, diverted and linked trips are considered only as wider network context. This is a robust approach that directly addresses the Highway Authority's concern regarding access from minor residential streets.

The existing parking survey dataset should be retained. It provides observed evidence from representative periods and demonstrates that daytime parking stress is below the commonly referenced high-stress threshold during the periods most closely aligned with the proposed store's core trading profile. Any further discrete-gap presentation can be derived from the existing observations and photographs without requiring a new survey.

The revised layout now demonstrates the facilities that were previously only described: customer car parking, EV charging, cycle parking, staff cycle storage, bin storage, pedestrian route and delivery point. The revised visibility drawing demonstrates pedestrian visibility and vehicle visibility in both directions, with boundary treatment controls. Servicing can be controlled by an enforceable Servicing Management Plan requiring out-of-hours, LGV-only deliveries and no HGV activity.

The proposal would bring a vacant/underused commercial building back into productive use and deliver a needed local convenience amenity with a specialist international food offer. When assessed against Planning Policy Wales, TAN 18, TAN 4 and Newport LDP Policies SP1, GP4 and T4, the development is acceptable in transport terms. It is therefore respectfully requested that the Highway objection be withdrawn, subject to the suggested conditions set out above.