

Highway Response

Ref: 25/0152

Date: 05/01/26

PROPOSAL: RESERVED MATTERS APPLICATION RELATING TO LAYOUT, SCALE, APPEARANCE, ACCESS AND LANDSCAPING FOR RESIDENTIAL DEVELOPMENT AT PHASE 4E/4G PURSUANT TO OUTLINE PLANNING PERMISSION 06/0471 FOR A MIXED USE REGENERATION OF THE FORMER LLANWERN STEELWORKS AND PARTIAL DISCHARGE OF CONDITIONS 01 (RESERVED MATTERS), 06 (RECREATIONAL AREAS), 08 (MATERIALS), 09 (DETAILS OF HARD LANDSCAPED ACCESS), 10 (BOUNDARY TREATMENTS), 11 (MANAGEMENT STRATEGY FOR MAINTENANCE OF OPEN SPACE), 12 (OFF STREET PARKING AND CYCLE PARKING), 15 (EMERGENCY ACCESS), 16 (DETAILS OF ROADS/CYCLEWAYS/FOOTWAYS), 18 (ESTATE ROADS), 22 (STREET LIGHTING AND CAR PARKING AREAS), 24 (SITE LEVELS), 33 & 34 (FOUL AND SURFACE WATER DRAINAGE), 39 (SUSTAINABILITY STATEMENT) AND 43 (FIRE FIGHTING ACCESS)

SITE: Glan Llyn Development Site Phase 4E/4G Queensway Llanwern Newport South Wales

Case Officer: Geraint Roberts

Highway Officer: Kevin Jackson

Following receipt of additional information, amended plans and rebuttal (targeted consultation response dated 16/01/26), we would update our comments as follows.

Highway recommendation:

Objection on grounds relating to highway safety and sustainability policies.

Highway Comments:

For ease of reference the following comments consider each drawing separately. All impacts would however have cumulative effects. Where no updated drawing has been found the comments remain as previously issued.

Vehicle Tracking 24519-C-008E -additional tracking drawing 24519-C-029-O

The additional tracking uses a 9.4m HGV. The maximum size is 12m, but it is customary to use 10m as the only vehicles commonly visiting residential areas longer than this are RCV and removals vans. It is accepted that the largest common vehicles are panel vans up to 8m (Amazon, Tesco etc.). Above this access should be possible, but not necessarily easy for furniture or other bulky items.

As a general comment the assessments are mostly based on driving into cul-de-sacs and reversing out which is not appropriate but can be accepted as showing the correct manoeuvre could also be done.

Examples of issues highlighted by the additional assessments are referenced by the inset numbers on the drawing and include:

- In all cases where vehicles can enter from either side only the right turn in has been assessed, being the least onerous. Examples include all drives accessed from the distributor road, notably P12, 13 & 19. To access in forward gear left in manoeuvres would require HGVs to cross to the other side as they approach. This can cause confusion and lots of additional conflicts.
- P12, 13, 18 & 19 all require amendments to the plans which do not appear to have been carried through to the planning drawing (others not checked). Some of these fall outside of the red line.
- P12 shows HGVs reversing into the distributor road and colliding with boundaries. (MfS states that reversing should be straight- see below). HGV drivers should know better but may enter without realising there was no turning area and then have to do this. In reality most HGV drivers would stop the traffic in both directions on the distributor road and reverse in. Whilst this may be safer it is still not acceptable.
- Similarly, with P19, HGVs would likely access from the distributor (left in) and manoeuvre adjacent to the junction, potentially impacting the distributor as well as the minor road.
- All of the manoeuvres require there to be no on street parking, which is unlikely. P18 even uses private parking spaces and is another example where HGVs would reverse as far as they can and stop. They would not enter and leave in forward gear.

In conclusion the assessments show that even vehicles significantly below the maximum length will not be able to access many properties safely and lawfully.

In response to the specific points made in the rebuttal we would add:

- It should be noted that the need for turning heads applies to all commonly anticipated vehicles and is not specifically for HGVs. That said reversing is more problematic for HGVs/commercial vehicles as they are longer and have greater blind spots.
- Some of the guidance referenced does however relate to HGVs, but what is expected in a residential setting is mainly to cater for domestic vehicles and vans. The largest vehicles are expected to struggle at times on minor residential roads. They should be fully catered for on and adjacent to the distributor roads.
- To assist the applicant in consideration of turning heads and manoeuvring requirements, we would refer them to Sections 6.8.2 and 6.8.8 of MfS excerpts reproduced below for convenience.

“6.8.2 Well-connected street networks have significant advantages for service vehicles. A shorter route can be used to cover a given area, and reversing may be avoided altogether. They also minimise land-take by avoiding the need for wasteful turning areas at the ends of cul-de-sacs.

*6.8.3 However, some sites cannot facilitate such ease of movement (e.g. linear sites and those with difficult topography), and use cul-de-sacs to make the best use of the land available. **For cul-de-sacs longer than 20 m, a turning area should be provided to cater for vehicles that will regularly need to enter the street.** (our emphasis)*

6.8.8 Reversing causes a disproportionately large number of moving vehicle accidents in the waste/recycling industry. Injuries to collection workers or members of the public by moving collection vehicles are invariably severe or fatal. BS 5906: 2005 recommends a maximum reversing distance of 12 m. Longer distances can be considered, but any reversing routes should be straight and free from obstacles or visual obstructions”.

We would suggest that the site is in fact a large practically blank canvass and not incapable of providing a well-connected network and the cul-de-sacs are largely related to commercial interest. For the avoidance of doubt, Highways do not take issue with cul-de-sacs with appropriate designs including a pragmatic approach to parking and practical servicing. Common vehicles should be able to turn easily, uncommon ones may struggle, reversing (within reason) or making multipoint manoeuvres.

Any references to waste management are applicable to other HGV /large van movements, except that common RCVs are 11.6m long and visit more frequently than any other vehicles of this size. Furthermore, if collection areas are proposed they do not need to access every house directly.

Whilst it specifically references waste management, we would also suggest the applicant should be familiar with “Making Space for Waste”. The issues around HGV movements apply to all commercial vehicles and it cites British Standards of 12m for reversing.

https://cdn.ps.emap.com/wpcontent/uploads/sites/2/2010/07/ADEPTMakingspaceforwaste_000.pdf

(If further reading is desired, the Highway code also considers reversing but does not set out all of the relevant laws (refer to Highways Act 1980). The HSE’s and the RHA’s websites deal mainly with reversing in goods yards but make the risks clear (and obviously the dangers are greater in public areas.)

The All Wales guidance does allow slightly longer cul-de-sacs (subject to conditions) but is clear that these are accessed from residential roads, not from the distributor road. (Reference “Fig1 Hierarchy of residential roads”).

The applicant suggests that deliveries could be made from the main road for some areas. Firstly, the distributor road has not been designed to an appropriate standard for this. As a bus route it should be in excess of 6m wide. Common standards are 6.3 to 6.7m wide and All Wales requires 6.5m. So, the road is already constrained and commercial vehicles would have the same problems as buses and they impact each other.

Secondly the position of the cul-de-sacs means that HGVs would be obstructing bends and junctions. They would obstruct visibility for the main carriageway as well as the cul-de-sacs they’re visiting and adjacent minor arms. Whilst stopping on the distributor could be acceptable on straight links away from bends and corners and will occur for some houses, we cannot support this in these particular locations.

Thirdly the practicalities of delivering furniture or white goods, or building materials would rule out remote parking for the larger vehicles. When possible, it would also result in greater dwell times.

It is difficult to understand why the applicant considers commercial vehicles would not visit these streets. Surely homeowners’ buy things. Most commonly furniture, white goods and supermarket deliveries, but less frequently many other things. Home delivery is getting increasingly common for all types of goods.

Previous comments.

- Vehicles indicated include a 12m refuse collection vehicle.
- The analysis takes no note of the assumed parking on street, which will probably make some areas impossible.
- Inaccessible private drives also include various dwellings accessed directly from the distributor road and these do not have turning heads. This results in a need for all commercial vehicles (not just HGVs) to reverse in/out from the distributor road which is not acceptable.

Pump Tracking 24519-C-021-D (No amended layout)

- The tracking is not considered helpful as it is less onerous than other assessments.
- As previously advised fire safety/access is covered adequately by building regulations and emergency services consultations. It is not of itself a highway issue that would prevent determination.

Private Parking Tracking Plan 24519-C-022-H (updated site layout)

- The key point is that it is not acceptable for the parking courts/drives to impact the distributor road. The frequency is not the issue, only the avoidable risk of collisions.
- All links should have demonstrably adequate width for two way traffic, visibility and no causes for sudden stopping or reversing adjacent to highway.
- The relevant standards are those relating to safety. Notwithstanding that they are shared/private they are still publicly accessed and therefore raise legitimate concerns, especially those that have knock on effect to adopted highways.
- The standards within MfS and All Wales guidance are still relevant and allow for “placemaking”. MfS places a lot of emphasis on place and function.
- The only real difference in terms of being adopted or not is maintenance issues and costs, which are not being considered here.
- It is perfectly possible to have character and still be practical and safe. We do not consider it is appropriate to condition the use of appropriate materials and layout to protect the public. Not least because this is a reserved matters application and must consider those very points (“*APPEARANCE, ACCESS AND LANDSCAPING*”). Once approved it would not be possible to change them without impacting other elements.
- The standards referred to are requirements of All Wales and MfS they are not related to adoption considerations for the street, but their potential to impact on adjacent adopted roads is relevant. They are considered as minima in terms of providing safe and practical layouts.
- The allocation of spaces for 128/129 is not a significant issue, but placing parking out of view is not supported as it has all the disadvantages of rear courtyard parking if on a lesser scale.
- Reversing prevents “good visibility” and requires higher skill levels, that’s why we try to minimise it. Even shared surfaces are required (by All Wales) to provide for vulnerable users. In fact it actually stipulates greater space requirements. The issues are only caused by the use of rear court yards which cannot be supported anyway as experience shows they are not used and inconsiderate and unsafe parking follows.
- For perspective, the assessment uses a 4.9m car when the average is 4.4m, popular vehicles such as SUVs are around 4.7m and the largest are over 5m. Which provides for a robust assessment vehicle.
- Improved tracking submission is noted.
- Parking for 146, 167/8 results is of concern as they are adjacent to an under-croft access and local distributor road. In addition, there is only one space for 146 and 147/8 have remote rear courtyard parking. There will be issues with conflicts, visibility and on street parking as a result.
- 136 manoeuvres are not shown and would logically reverse into the area leading into rear access for 126/7 and potentially others resulting in excessive reversing and potential conflict with pedestrians.
- The spaces for 154 obstruct access to the rear of 152/3 this results in an acceptable detour without a continuous path for bins/cycle storage etc.. Bins and bikes have to squeeze past parking for 150 and the trees in the area compound the issues.
- The cumulative impacts of difficult access, remote spaces and lack of spaces and lack of safe/convenient pedestrian routes raises a likelihood of parking /stopping and reversing on the distributor road bend adjacent to the access points and results in objections on highway safety grounds.
- Another rear courtyard for 16/26 with inappropriate access, excessive reversing, inappropriate location for bins (no provision for collection) and cycles and long pedestrian routes for the houses. Again, changes to facilitate bin collection should not be the subject of conditions. Finer details can be agreed later, but the basic detail must be agreed at this point. This includes locations, access routes and sizes.
- All car park accesses serving more than two properties should be designed as a cul de sac with radius kerbs, tactile paving and a minimum of 4.5m carriageway plus a pedestrian route to avoid prejudice to any future s38 agreements for the roads they access or accessed from. This is needed for pedestrian/disabled awareness, not just to tick a s38 box.

Visibility Splays – Planning 24519-C-018-G-Updated site layout

- Forward visibility does not appear to have been measured at 1m from the kerb as required (not all vehicles are cars) but is generally within highway. Opposite to unit 153 is not drawn correctly and does not make it clear what is achieved. This needs clarification/correction.
- Street 2 shows forward visibility that is likely to be obstructed by trees, which will also obstruct the available carriageway so should be relocated. Tree numbers are not a concern for highways, but they must be located away from visibility splays and manoeuvring areas to avoid impacts.
- No forward visibility is achieved for street 3 and lane 3. These are drawn through a building on one side and private curtilage on the other. Clear priorities have now been established here for junction visibility.
- Splays should be added for the access junctions and the turning head/private drive T junctions. Accesses adjacent to 156 and 146 are still not shown. Adjacent to 179 is only drawn to one side. (Not necessarily an issue but missing information).
- Between 153 and 141 the splay relies on private plots. The “alternative splay line” is not helpful or appropriate.
- Splays must be within adopted highway.
- Between units 8 and 9 the visibility is also not achieved within highway.
- Visibility is key to safety and must be provided.

LAP Proposals Drawings 1562A10-LLA-ZZ-00-DR-L-0401 No new plan found – original comments below

- Area 6 shows gates opening outwards. These should all open inwards, not over or towards highway/footway. We note that the rebuttal states they won't, so this is just a reminder to update the plans.

Cycle Route Plan - Planning 24519-C-020-D – Site layout amended

- The plans showed no detail of how the development provides connection between shared and on road routes. The amended plan does at least indicate where connections are intended.
- We note confirmation that where cycles are intended to share space, the route will be 3m wide and have appropriate tactiles and signs.
- Signs and tactile paving must direct cycles back into carriageway where appropriate and warn other users when they are present in pedestrian areas. This hasn't been shown. Of particular concern is the route through lane 2/ street 1. This should not be a shared use. This road is suitable for cycling on carriageway and the footway is not wide enough to be shared.
- Further detail was needed at this stage to demonstrate there is sufficient space provided and boundary treatments are appropriate. Finer detail can be conditioned when it is shown that sufficient space is dedicated.

Street Lighting Layout – Planning 24519 – C - 025- B no amended plan found -original comments below

- The plans now show lighting for private parking areas, where pedestrian movement will occur (and anti-social behaviour is likely) and lighting should be provided, although it may not be adopted.
- Street lighting details must be agreed through the s38 process which requires a lot more detailed assessment by lighting professionals and so cannot sensibly be approved before the site has reached technical approval stage.
- Highway would be content to condition a detailed lighting scheme for the unadopted areas.

Planning Layout R9138-SMH-25-00-DR – 0008 P02 No updated plan found- previous comments as below.

- Too many units are served by a single access point (junction road 1 / road 5 and eastern section main access) so developers should provide loops, emergency access or a (convoluted) link between the two accesses to resolve.
- The access points from Main Rd are not positioned or orientated in a safe way but are understood to be existing. As neither are appropriate, it may be better to serve even numbers of units from each. The southern access is arguable worse and serves most units.
- Whilst there is no prescribed limit and it is a matter for professional judgement; good practice suggests that the issue should be avoided where possible and numbers served by an individual access kept to a minimum.
- Anything over 100 units raises concerns which could be addressed as the site is not constrained in this respect. As a minimum, redundancy or loops could easily address the issue.
- All frontages must have footway/pedestrian provision, and these should generally be 2m wide. Some of these are not an appropriate width (eg around unit 69/70 and 78/79 and 36 to 43 etc appears to 1m which will be obstructed by parked cars). In other areas there is no provision at all eg adjacent to 140/141. This is a narrow bend, and pedestrians should have a safe route here, not mix with traffic.
- Shared surfaces must have additional width to provide for pedestrians and take account of parking and disabled users. (All Wales standard).
- Private drives should not serve more than 5 units maximum.
- No information has been provided to demonstrate electric vehicle charging and the use communal parking courts makes this difficult for large numbers of residents to ever achieve. Whilst a condition can be applied it should be noted that experience shows it may be difficult to discharge.
- No information has been provided for bus stop locations which must be accommodated along the frontage of this site and require additional foot/cycleway depth. As the road is already permitted/built any additional space is a

consideration for this development which will be served by said bus stops. We do not consider there is sufficient space as the foot/cycleway is already set at minimum requirements without bus stops and quality bus stops have significant size requirements.

- The layout shows a number of build outs that would be problematic in terms of maintenance and adoption. In addition, they are located adjacent to bends so do not have appropriate forward visibility and raise a safety issue and objection.
- Courtyard parking is not supported but examples where there is no pedestrian access/protection or adequate width for two-way movements with pedestrians raise further objections. (adjacent to 141 /153 and 22/8 etc.)

Parking LLAN/PCP/001 rev- No amended plan found -original comments below

- Several corner units have pedestrian access on or near radius kerbs and therefore drivers will park on bends and corners.
- All roads need to be a minimum of 5.5m wide to provide for on street parking. Where vehicles are reversing into the road the manoeuvring space must be considered as well as the space taken by parked cars. Eg street 3 etc.
- Private drives need provision for visitor parking. Terms like Home zone do not influence driver behaviour or the physical space requirements. It should be noted that All Wales actually prescribes wider roads where shared use is proposed.
- The layout appears does not indicate visitor parking, but this would impact access for larger vehicles as well as visibility splays, so raising safety issues.
- Most main road units have rear parking. This is of a poor standard and (in terms of space and security) so will not be used as intended and parking will obstruct Main Road, which is a local distributor and bus route, so needs to be wider if it is to accommodate parking.
- Parking ratios for individual units have not been considered in detail at this stage.
- Cycle storage is indicated for most units but not all. Eg 171 and 182
- Extensive dropped kerbs are used to provide long stretches of parking. This is prejudicial to certain disabled users and reduces on street parking, so cannot be supported.
- We note that the applicant disagrees with this statement, but do not consider it to be appropriate or balanced. For clarity “extensive” is used to mean more than a double drive. It cannot be supported given its impacts on parking and inclusivity policies.
- Parking is provided on the inside of bends where it is unlikely there will be sufficient visibility. Eg 108/109.

The application includes the requested discharge of various conditions, but as the layout is not acceptable and needs amendments, to garner Highways’ support it would not be appropriate to discharge any of the conditions. Furthermore, insufficient information appears to have been provided to satisfy some of the conditions.

In summary, Highways do not consider the arguments put forward to be sufficient to address the issues satisfactorily. We would maintain a number of objections relating to highway safety, sustainability and design standards.